

**Herefordshire Traveller Sites Development Plan Document - Representations received during Additional Sites Consultation.**

<b>Summary of representations: Oakfields, Nash End Lane Bosbury.</b>	<b>Respondents</b>	<b>Herefordshire Council Officer Response</b>
The Planning Application P183661 is for 1 Residential Site and 5 Transit Pitches NOT 4 additional residential pitches What is a transit pitch? Concerns that these could be long term	1019, 1058	It is noted that the current planning application for this site is not for the same number and type of pitches proposed as part of the additional sites consultation. Planning policy comments have been made to this effect on the application.
Condition on existing planning application that no more than 2 pitches allowed on the site.	1019, 1058, 1061	Noted. However, it is possible to apply to vary a condition or to make a new application.
Only 1 pitch in place – application for second pitch lapsed.	1061, 1084	The original application has commenced.
The increase of four families is out of proportion to the number of people living in this small community	1061,1084	Policy H4 states in criterion 6 “in rural areas, the size of the site does not dominate nearby settled communities”. There will still be a greater amount of other housing in the immediate area with the additional four pitches.
There is already a large concentration of Traveller sites in the parish area	1019, 1084	The Council has explored opportunities for new sites across the County. It has carried out a number of call for sites processes but the Council has received very few site suggestions in response to these.
Concerns about highway issues / junction with the B road	1053, 1061, 1082, 1084	Noted. No highways objections have been raised but a detailed access and speed assessment will be required as part of any planning application.
Concerns about impact of new development on infrastructure, schools and GP’s etc.	1019, 1053, 1061, 1082,	It is likely that this relatively small scale of additional development will place undue pressure on existing services and infrastructure.
The site will be visible from the lane	1082	The existing site is well-screened. Policies of the Core Strategy and the Travellers Sites Development Plan will require that any new traveller development is accompanied by a suitable landscaping / screening plan.

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The proposed location is close to (several hundred metres) and is visible to a significant number of Grade II listed buildings, and this further development will have a significant negative effect on the County's historic and environmental heritage.	1061	The County Conservation Officer has been consulted on this matter and has raised no concerns about the proposed extension in relation to the listed buildings in the vicinity.
The public need assurances that the cost of providing the proposed site and its ongoing maintenance will be funded by travellers.	1062	This will be a privately developed site.
Logical to expand existing sites	1075 1088 1089	Noted
Development of site is consistent with the Development plan. (The documents relating to the planning application number P183661/F were also submitted. <a href="https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=183661&amp;search=oakfield">https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=183661&amp;search=oakfield</a>	1090	Noted.
With regard to this site, it does not appear that the significance of the Grade II listed buildings within the vicinity will be affected. Again we assume your heritage colleagues have been approached for their local opinion?	1009	The County Conservation Officer has been consulted on this matter and has raised no concerns about the proposed extension in relation to the listed buildings in the vicinity.
No known sites of geological interest and therefore happy with the proposal.	1670	Noted
Concern of expansion would exacerbate issues at the local authority Tinkers Corner Site.	1019	There is no reason to believe that the expansion at this site will have a negative impact on the local authority managed site at Tinker's Corner.
Should be no issue in connecting the four additional pitches to the water supply. Severn Trent regarding sewage.	1001	Noted
In favour of proposals for four extra pitches.	1115	Noted.
This consultation will not be closed until after the above planning has been determined. This is ingenuous.	1058	The application has been submitted independently of this consultation. The application has not yet been determined.

Summary of representations : Land at Madley	Respondents	Herefordshire Council Officer Response
Generally unsuitable location	1063 1066 1078 1089	Noted. However policy H4 and RA3 of the Core Strategy allow development outside of settlements. The responses below provide more detail on the Council's view of the suitability of the location.
The site is remote, located several miles from major roads, which surely cannot be appropriate for a travelling community. Unsuitable access.	1074, 1053, 1004, 1089	Policy H4 and RA3 of the Core Strategy allow development outside of settlements. By virtue of this fact, some of the sites will not be adjacent to settlements. Policy H4 of the Core Strategy requires sites to have reasonable access to services and facilities, including health and schools. It is considered that this location meets that criteria being approximately 2.4 km to Madley, and 2km to Kingstone. There is an existing access that served the emergency stopping place that will be suitable for the proposed use.
<p>The site is located close to industrial premises and an auction site, so will suffer from noise pollution and traffic nuisance. A bund will not adequately address these issues.</p> <p>Concern about fire risk</p>	<p>1089, 1072, 1063, 1066, 1078</p> <p>1068</p>	<p>We have consulted with the Environmental Health Officers who have provided the following advice in relation to these issues:</p> <p>The site is in reasonably close proximity to the Stoney Street poultry site. Planning permission has recently be granted for this site for the demolition of older poultry units and their replacement (and also an expansion) with more modern poultry units. The odour assessments undertaken in connection with this application find that once the development takes place, the proposed Travellers' site will be exposed to odour at well below the Environment Agency benchmark standard of 3ouE/m3 and in the event of this development not proceeding the current poultry site is only just over this benchmark standard, so on grounds of odour I would have no objection.</p> <p>The proposal is immediately to the north of the Madley Industrial Estate and there are currently 3 large buildings designated as B2 General Industrial use. These have the</p>

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		<p>potential to cause amenity issues for the proposed occupants of the site as the industrial estate is unlikely to have restrictive conditions applied in terms of issues such as hours of operation and so on. At my visit there was minimal noise from the two units to the east but the western site (Gelpack) had noise emanating from roof high level of three distinctive types. So I do have reservations about the proposal in question.</p> <p>However, the site of the proposal has in the past been used for a number of years as a temporary Travellers site and our department has not received any complaints on grounds of noise. As the front or southern part of the proposal is less than 40m away from the front of some of the industrial building I would not recommend that this part of the site be used for permanent Travellers pitches. Further back towards the rear, noise will be attenuated by distance and it is possible that an additional physical bund could be supplied on the southern part of the proposal which could also attenuate noise further.</p> <p>In terms of fire risk the site layout will follow standards relating to spacing between caravans and between boundary of the site.</p>
There is no other traveller community in the area, so site users will be isolated from the larger traveller community	1089	Noted but do not consider this to be a relevant planning consideration.
Concerned about impact on local services (GP Surgery, schools, and police.	1074,1053, 1054, 1059, 1079, 1089, 1004, 1007, 1008, 1100, 1102	It is unlikely that this relatively small scale of additional development will place undue pressure on existing services and infrastructure.
The site does not comply with policy H4 (in particular points 1, 3, 4, 5) and therefore fails to comply with policy RA3	1089	The Council considers that this site does meet the requirements of policy H4 in particular:

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		<ul style="list-style-type: none"> <li>- It does afford reasonable access to services and facilities;</li> <li>- There is no evidence that a residential site at this location could not co-exist with the local community;</li> <li>- Given the location of the site there is no reason why mixed business/residential accommodation could not be provided;</li> <li>- It is unlikely that this relatively small scale of additional development will place undue pressure on existing services and infrastructure.</li> </ul>
Site does not comply with NDP policies.	1074	This site is within Madley Parish Council area. A neighbourhood plan is being produced but has not yet reached Regulation 14 stage. The provision of Travellers pitches is considered to be a strategic matter which is the subject of a county wide Traveller Sites Development Plan rather than being addressed by individual neighbourhood plans.
The site will generate yet more traffic on very busy and dangerous local narrow lanes and roads. Minor road prone to flooding Reference to Gelpack application (140928) and required traffic management plan.	1074, 1054, 1059, 1067, 1068, 1079, 1089, 1032, 1004, 1007, 1008	No highways objections have been raised but a detailed access and speed assessment will be required as part of any planning application. Previous records of surface water in the area did not indicate any flooding issues in the vicinity. Reference to Gelpack application not considered relevant.
Demographic of village under threat from this development and other development taking place in the area.	1075	Noted.

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<p>Concern about the impact on wildlife in the area particularly in relation to Great crested newts and bat colonies. Colony of bats now in area.</p>	<p>1007, 1054, 1059, 1064, 1079, 1085, 1091, 1007, 1008, 1102</p>	<p>We have consulted with the County Ecologist on this matter who has advised that an Extended Phase 1 ecological survey including consideration for use by reptiles, amphibians and bats (including foraging and commuting (all recorded in the locality) will be required as part of the planning application process. The report should clearly identify and provide robust risk avoidance measures and working methods for general ecology and any species-specific mitigation identified by the survey. Any requirements for protected species licences must be clearly detailed.</p>
<p>Numerous references to previous use of the site as an emergency stopping place including:</p> <ul style="list-style-type: none"> <li>• Unsuccessful and under used.</li> <li>• Council sold it</li> <li>• Historic problems with drainage</li> <li>• No integration with local community</li> <li>• Travellers did not wish to be at Madley because of the location and substandard facilities.</li> <li>• Different traveller groups forced together</li> <li>• Antisocial behaviour and alleged associated increases in crime.</li> </ul>	<p>1063, 1066, 1074, 1078, 1054, 1055, 1059, 1064, 1068, 1079, 1091, 1096, 1097, 1093, 1098, 1100, 1101, 1077</p>	<p>The proposed use is different from the previous use in that it will be a permanent residential site rather than for temporary stays. Evidence is that residential sites, including private sites, elsewhere in the county are carefully managed and well maintained.</p> <p>Previously the site did not prove suitable as an emergency stopping place primarily as it not in close proximity to the major traveller transit routes in the county. However it is now being proposed as a residential base for travellers and the proximity to major routes is not such a significant issue.</p> <p>There are numerous references to incidents that occurred in the locality at the time when the site was occupied. We are not in a position to verify these claims but it is not considered reasonable to assume that the same will occur again on the basis that the site will be occupied by travellers. As stated above it should be noted that there are many traveller sites in the County where there are no such issues arising.</p>

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		<p>Planning conditions can be applied as necessary to ensure drainage issues are addressed.</p> <p>Details of how surface water run-off will be managed will be required to ensure no increased discharge from site will occur and how potential pollution/contamination from vehicles, roadway and drives will be managed.</p>
<p>Practical maximum limited capacity is 13. 20 pitches were not constructed.</p>	<p>1068</p>	<p>Noted. The proposal is for 10 pitches.</p>
<p>The public need assurances that the cost of providing the site and its ongoing maintenance will be funded by travellers. Who is funding? Herefordshire Council should not waste money</p>	<p>1059, 1062, 1007,1008,1100</p>	<p>The site is now privately owned and will be privately funded.</p>
<p>This is an area which contains sensitive communications systems, these could be compromised</p>	<p>1053</p>	<p>It is assumed that there are security systems in place as standard.</p>
<p>Concerned at misuse of site leading to issues</p>	<p>1102</p>	<p>Noted</p>
<p>Area changed and grown since last used as traveller site</p>	<p>1089</p>	<p>Noted, however it is still considered an appropriate reuse of the site.</p>
<p>Land at Stoney Street near Madley falls within the River Wye Special Area of Conservation (SAC) Catchment area. We note the HRA provided for this consultation does not consider impacts on water quality and quantity. Although these issues were considered in previous consultations by your authority on traveller sites put forward to undertake your HRA, it is not clear whether the addition of these two sites put forward can lead your authority to determine there will be no Likely Significant Effect on the River Wye SAC as a result of the potential increase in phosphate levels. A Nutrient Management Plan has been devised for the River Wye SAC Catchment, the ability of the Nutrient Management Plan to achieve the conservation objective for phosphates for the River Wye SAC during the plan period 2027 is based on levels of development not exceeding what is set out in the Herefordshire Core Strategy. If levels of</p>	<p>1081</p>	<p><b>Please note that this response has been prepared by Land Use Consultants.</b></p> <p>Land at Stoney Street, near Madley (for up to 10 pitches) Of the seven sites (28 pitches) proposed for allocation in the Travellers' Sites DPD, the HRA (November 2017) and HRA Addendum (October 2018) identified that four sites (15 pitches) will have no likely significant effects on any European Sites. Three sites (13 pitches) were identified in the HRA (November 2017) and HRA Addendum (October 2018) as having potential to affect the River Wye SAC – Romany Close, Grafton; Extension to Orchard Caravan Park, Watery Lane, Lower Bullingham; and Land at Stoney Street, Madley. Water quality and quantity effects were not assessed within the Travellers' Sites DPD or the Herefordshire Local Plan Core Strategy HRA Report under policy H4: Traveller Sites but were</p>

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<p>development exceed those allocated within the Core Strategy then the Nutrient Management Plan cannot be relied upon alone by your authority as the competent body to come to a finding of no likely significant effect. Therefore, the HRA should confirm that the additional site at Madley can be accommodated within the available headroom/phosphate allowance.</p>		<p>assessed for Core Strategy policy SS2: Delivering New Homes which proposes the delivery of a minimum of 16,500 homes. The proposed allocation of 13 pitches which is assumed to equate to approximately 13 households is not significant enough to alter the effects identified for policy SS2 or the ability of the Nutrient Management Plan, which is based on levels of development outlined in the Core Strategy, to achieve the conservation objectives for phosphates for the River Wye SAC.</p> <p>Furthermore there are sufficient policy safeguards included within the Travellers' Sites DPD and Core Strategy to avoid or mitigate a likely significant effect on water quality or quantity at the River Wye SAC. Policy TS1 – Residential Traveller Pitches and Sites requires proposals to outline suitable arrangements for foul sewerage disposal and surface water drainage. Core Strategy policy SD4 – Wastewater treatment and river water quality states that development should not undermine the achievement of water quality targets for rivers within the county, in particular through the treatment of wastewater. In the first instance, developments should seek to connect to the existing mains wastewater infrastructure network. This is the case for the sites at Romany Close and Extension to Orchard Park. It states that planning permission will only be granted where it can be demonstrated that there will be no adverse effect on the integrity of the SAC in view of the site's conservation objectives; and, where the nutrient levels set for conservation objectives are already exceeded, new development should not compromise the ability to reduce levels to those which are defined as favourable for the site. Where connection to the wastewater infrastructure network is not practicable, which is the case for Land at Stoney Street, Madley, proposals for septic tanks should be</p>

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		<p>accompanied by information to demonstrate that there will be no likely significant effect on water quality of the River Wye SAC; and where there will be a likely significant effect upon a SAC river, information to enable the Council to ascertain that the development will have no adverse effect on the integrity of the SAC must accompany the proposal. Furthermore, the Government's general binding rules require septic tanks to be domestic in nature and not to cause pollution.</p> <p>Therefore, the scale and extent of the proposed developments are not likely to be significant, and sufficient policy safeguards are included within the Core Strategy and Travellers' Sites DPD to avoid a likely significant effect on water quality or quantity at the River Wye SAC.</p>
<p>Stoney Street is of course a 'Roman Road' and the proposed site is immediately adjacent. However as the land has already been disturbed there is unlikely to be any surviving archaeological interest. Nevertheless you may wish to liaise with your heritage colleague(s) to consider their opinion from the local perspective.</p>	1009	<p>The County Archaeologist has advised that the site has been dug up before and is almost entirely hardstanding upon which the development would sit. The archaeological implications are therefore considered minimal, the close proximity of the Roman road notwithstanding.</p>
<p>Herefordshire Council control this site and should therefore be more likely to know if it is able to absorb the extra pitches. They have a monitoring system in place.</p>	1061 1084	<p>This site is no longer in the ownership of the Council.</p>
<p>The Parish Councils only concern would be appropriate monitoring and policing of the site to ensure the safety of the local community and businesses located close to the site.</p>	1010	<p>Noted.</p>
<p>Larger plots larger sheds disabled facilities bigger baths 2 toilet plots for large family bigger entrance barrier is absolutely crucial so bigger and longer 2 bed homes can fit on</p>	1076	<p>Noted. The size of plots and structures will be determined at the planning application stage.</p>
<p>There are no problems envisaged in providing a clean water supply to the site, with an existing 6" distribution water main located in Stone Street. There are no public sewers within</p>	1001	<p>Noted</p>

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proximity of the site, therefore if the site wishes to connect to the public sewerage network then significant off-site sewers will be required at the developers' expense.		
Site should be used for industry.	1072	Noted. Although planning permission was granted planning permission for business use in March 2015 (P140928/N).

<b>Other Comments</b>	<b>Respondents</b>	<b>Officer Response</b>
While we welcome this opportunity to give our views, the topic this Supplementary Planning Document covers is unlikely to have major effects on the natural environment, but may nonetheless have some effects. We therefore do not wish to provide specific comments, but advise the you to consider the following issues: Green Infrastructure, Biodiversity Enhancement, Landscape Enhancement, Other design considerations, Strategic Environmental Assessment/Habitats Regulations Assessment (Please refer to full response for full version).	1081	Policies TS1 and TS2 of the Travellers Sites Documents address these issues.
Both sites lie outside the River Lugg Internal Drainage Board's operational area and consequently our interests are not affected by the proposals.	1116	Noted
The SWC have no in principle objections to the two proposed sites for additional pitches at Bosbury and Madley. Obviously, if new potential sites for either permanent or transit pitches are proposed in the process of preparing the Travellers' Sites DPD then we would wish to have an opportunity to make representations.	1003	Noted
We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation	1080	Noted
Thank you for your consultation on the additional sites. The Canal & River Trust has no comments to make.	1095	Noted

Other Comments	Respondents	Officer Response
Although there does not seem to be a heritage assessment accompanying the consultation, having undertaken a desk based assessment it appears, in my opinion, there would be a negligible impact from a heritage perspective.	1009	Noted. As stated before both archaeology and conservation officers have been consulted on the proposals and have raised no concerns in relation to the proposals.
Given the close links within the traveller community, it seems more appropriate to enlarge existing traveller sites in Herefordshire, rather than create new ones in unsuitable locations. Sites should be located near the M50 or major A roads, not in remote localities where narrow country lanes are the only means of access.	1089	The Council has explored opportunities for both extension of, and intensification within existing sites and has already identified additional pitches in this way in the DPD. However the examination process has identified a need for additional pitches to those already identified. The requirement to be located near major routes is a more relevant consideration for temporary stopping places / transit sites.
The Council would like to formally note the consultation on the additional sites. As the proposals are outside the parish it was not considered this was anything the Council wanted to offer feedback on.	1117	Noted
Grafton site needs play area for children. Parking zones bigger entrance as can only fit a 30x10 mobile and larger families need bigger homes and longer double units I've been asking for many years for this to be fixed	1076	Noted – the Grafton site is not part of this consultation and the proposals for the additional pitch are still included within the plan.
Aymestrey Parish Council wishes to point out that neither the traveller site at Shobdon Rock, nor a single caravan pitch behind Mortimer's Cross Pub which was listed in Herefordshire Council's Gypsy and Travellers' Accommodation Assessment, have been included in the Development Plan Document.	1056	These sites are included with the GTAA and therefore have been counted in the number of pitches as existing sites. As no changes to them are proposed in this consultation they do not need to be included in the consultation document.
The whole traveller site location should be revisited, as this suggestion seems to be no more than a convenient regurgitation of the previous unsuccessful use.	1072	Noted. The Council has explored opportunities for both extension of, and intensification within existing sites and has already identified additional pitches in this way in the DPD. However the examination process has identified a need for additional pitches to those already identified
The Parish of Bosbury and Coddington is approximately 1.1% of the total area of Herefordshire, and already has over 10% of the County's traveller pitches. This density of pitches is obviously	1061	The Council has explored opportunities for new sites across the County. It has carried out a number of call for sites

<b>Other Comments</b>	<b>Respondents</b>	<b>Officer Response</b>
disproportionate and there can be no justification for any further pitches here. Several areas of the County currently have no pitches and these regions should be considered as priority areas for the development of new sites. Why should this small area of the County have its resources and infrastructure so burdened whilst other areas remain free from paying their fair share of the costs of accommodating the County's travellers?		processes but the Council has received very few site suggestions in response to these.
I am very keen to see a good quality transit site just off the A49 near Leominster. This site is on a well used route and it is essential that Herefordshire Council has a good and practical transfer site when the need arises.	1115	Noted
I have reviewed the additional sites and can confirm that they do not fall within the defined Development High Risk Area and we therefore have no specific comments to make.	1013	Noted
No comments on the additional sites.	1008	Noted.

<b>Comments in relation to the SA &amp; HRA</b>	<b>Respondents</b>	<b>Response provided from Land Use Consultants</b>
The assessment appraisal has education and lack of public transport as only a minor negative surely these are greater than that. Climate Change 16.1 How can this be neutral if there at least four more families the effect on the Greenhouse emissions are bound to go up effecting this community surely a negative for this site.	1061 1084	In order to ensure consistency in the appraisal of the site options, the effects identified were based on a detailed set of assumptions that were development and applied to the site options at Preferred Options stage and Pre-Submission Draft stage. The appraisal attempted to differentiate between the most significant effects and other more minor effects, however, the dividing line in making a decision about the significance is often quite small. Also, scores are relative to the scale of proposals under consideration. <ul style="list-style-type: none"> <li>An uncertain minor negative effect rather than a significant negative effect was identified for SA objective 8:</li> </ul>

		<p>Education as the site is not within 800m (reasonable walking distance) of either a primary or secondary school, however, there may be potential for the site to be served by school transport.</p> <ul style="list-style-type: none"> <li>• A minor negative effect was identified for SA objective 4: Reduce road traffic as the site is not within or adjoining either Hereford, Leominster, Ledbury, Ross-on-Wye, and is not at a settlement served by public transport.</li> <li>• The negligible effect identified for SA objective 16: Climate Change relates to levels of greenhouse gas emissions from built development which will be influenced not by location but by design and onsite practices. Proximity to public transport is considered under SA objective 4: Reduce road traffic.</li> </ul>
Employment – No traveller relevant jobs on site	1068	There are no jobs that are specific to travellers. The reference to this possibility is made in the same way as it would be when bricks and mortar housing is proposed in proximity to land uses that could potentially provide job opportunities for the local residents.