

Herefordshire Traveller Sites Development Plan Document Proposed Additional Modifications

May 2019

Additional Modifications

This schedule includes a list of proposed additional modifications to the Herefordshire Travellers Sites Development Plan Document (DPD). These do not relate to the soundness of the plan, unlike the main modifications, and are therefore not subject to consultation. **This schedule is published for information purposes only.**

This schedule includes modifications that have arisen from the hearing sessions that took place on 22nd May 2018 and 18th March 2019. It also includes additional modifications that were included in the Schedule of Suggested Minor Changes that was submitted to the Secretary of State in February 2018 (where these have not been superseded).

1. The suggested additional modifications are listed in the order they appear in the pre-submission version of the plan.
2. For each amendment, information on the proposed change and the reason for the change is given. Where new text is proposed it has been underlined. Where it is proposed to delete wording from policies or text this is shown as crossed out.
3. Each additional modification has been given a reference number beginning 'AM'
4. Some further additional modifications may be made by the Council as necessary before adoption of the Traveller Sites DPD.
5. The main and additional modifications have been incorporated into a track change version of the Traveller Sites DPD for reference purposes

All the documentation is available at:

https://www.herefordshire.gov.uk/info/200185/local_plan/796/travellers_sites_document_examination/1

Additional Modification number	DPD Paragraph	Proposed modification	Reason
AM1	Paragraph 1.1	The council is preparing a number of planning documents known as the Local plan to guide development and change in the county over the next 20 years. When the Travellers Sites Development Plan is adopted it will be part of the Herefordshire Local Plan 2011—2031. <u>This adopted Travellers Sites Development Plan Document (DPD) forms part of the Herefordshire Local Plan. The policies of the DPD should be considered in conjunction with the policies of the Core Strategy.”</u>	To update the plan for adoption and to clarify the relationship with the Core Strategy.
AM2	Paragraph 1.2	The current stage in the process of preparing the Travellers Sites Development Plan Document is the publication of a Pre-Submission Publication version. Following this, the Development Plan document will then be submitted to Secretary of State for Department of Communities and Local Government for examination. When adopted the development plan document will be used for development control purposes to determine applications for new Gypsy and Traveller pitches.	This paragraph is no longer required in the adopted DPD.
AM3	Paragraph 2.1	Delete additional full stop at end of paragraph.	Correct typographical error.
AM4	Section 3 Previous consultation stages	Previous Consultation Stages Issues and Options 3.1 — An issues and options Paper was published for consultation in August 2014. This document focused on how any need for Traveller accommodation in Herefordshire should be met, by identifying the possible ways in which sites for permanent and transit pitches and plots for Travelling Showpeople could come forward. It looked at the best approach or “options” for how sites and broad locations of search can be identified to meet existing and any future need. However it did not look at individual sites. The responses received to this consultation are set out in the Issues and Options Results Report September 2015.	Deleted as not necessary to include detail about the plan making process in the adopted plan.
AM5	Paragraph 3.2	Gypsy and Traveller Accommodation Needs Assessment (GTAA) 2015 The council appointed independent consultants to assess how many pitches will be needed in the county up to 2031. The findings of this assessment were consulted on in February/March 2015 and changes were made with an updated version issued in	Paragraph deleted as now unnecessary given the changes made to the GTAA figures as a result of discussions at the first hearing session and also in view

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		November 2015. (An update to the GTAA was carried out in July 2017. Comments on this will be sought as part of the pre-submission publication.)	of references to GTAA in paragraph 4.2
AM6	Paragraph 3.3	<p>Preferred Options Document 2016</p> <p>3.3 — A preferred options document was published for consultation between July and September 2016. It identified 8 sites for consideration for traveller accommodation. The responses to this can be found on the Councils website</p>	Deleted as not necessary to include detail about former stages of the plan.
AM7	Paragraphs 3.4 – 3.7	<p><u>Sustainability Appraisal (SA) is a systematic process that must be carried out during the preparation of a Local Plan. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. The process assesses the impact of the DPD on the environment, people and the economy. It incorporates the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the ‘Strategic Environmental Assessment Regulations’, which implement the requirements of the European Directive 2001 /42/ EC (the ‘Strategic Environmental Assessment Directive’) on the assessment of the effects of certain plans and programmes on the environment. Sustainability appraisal ensures that potential environmental effects are given full consideration alongside social and economic issues. This DPD has been assessed against various sustainability criteria at the different stages of plan preparation and the results can be found in the Sustainability Appraisal.</u></p> <p><u>The DPD has also been subject to Habitats Regulations Assessment (HRA) screening to assess whether there would be likely significant effects on sites of international importance for wildlife (European designated sites). Where a land use plan is likely to have a significant effect on such sites, an appropriate assessment must be carried out of the implications in respect of their conservation objectives. The screening exercise has considered potential effects on European sites within and around Herefordshire. Overall, it was concluded that no likely significant effects will occur</u></p>	Insert new paragraphs to explain context of SA/ HRA and update. Remove detail about the various processes during the plan preparation.

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		<p><u>as a result of the inclusion of the allocated additional sites in the Travellers' Sites DPD.</u></p> <p>The Habitats Regulations Assessment and the Sustainability Appraisal (SA) of the preferred options DPD can be viewed at: https://www.herefordshire.gov.uk/planning-and-building-control/planning-policy/Travellers-sites-document.</p> <p>3.5 — These appraised the sites included in the Preferred Options DPD and the findings and recommendations have been incorporated into this pre-submission publication. A further HRA and SA will be carried out on the pre-submission draft</p> <p>3.6 — The preferred options HRA concluded that the European sites are some distance away from the proposed Travellers' sites and are unlikely to be affected by the proposals, due to their scale. The only European site in close proximity to any of the proposed sites is the River Wye SAC and the HRA did identify that four of the sites are close enough to the SAC that recreational activities could increase physical disturbance/damage, or erosion/trampling. However, it concluded that in all cases, the scale of development is very small and unlikely to result in significant effects. It also stated that mitigation for this possible risk could be found in Core Strategy policies. For example Policy H4 specifies that sufficient on-site play areas should be provided on Traveller Sites. Additionally Core Strategy policies OS1-OS3, relate to open space, sport and recreation provision. Policies TS1 and TS2 of this DPD include a requirement for play areas and this will help to address the concerns raised in the HRA.</p> <p>3.7 — The SA identified a range of possible effects resulting from the development of the sites included in the Preferred Options document. It concluded that in general, the three preferred sites that are located close to the main towns of Herefordshire are likely to have the most positive effects on the SA objectives because they should</p>	

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		offer good access to job opportunities, services and facilities and public transport links. As with all of the preferred sites, the three sites closest to the main towns of Herefordshire could still have negative effects on other SA objectives, particularly those relating to the environmental topics. It advised that careful consideration therefore needs to be given to the ways that these effects could be mitigated and that close attention should be paid to mitigating the significant negative effects identified for each site. Not all of the sites that were included in the preferred options are included in the pre-submission draft.	
AM8	Paragraph 4.1	In total there are 129 133 authorised pitches across the county.	To update text to take into account new planning permissions granted since the publication of the pre-submission draft and to be consistent with the revised table 5.3 of the GTAA.
AM9	Paragraph 4.2	Local authorities are required to assess the accommodation needs of Gypsies and Travellers either living in, or resorting to their area. <u>The Gypsy and Traveller Accommodation Assessment (GTAA) is the key evidence base for the requirement for new pitches. Various updates of the GTAA were produced as part of the plan making process and final amendments were made in light of the outcome of the hearing sessions.</u> Herefordshire Council appointed independent consultants ARC4 to carry out a Gypsy and Traveller Accommodation Needs Assessment. An initial report setting out Arc4's findings was published in February 2015. This was made available for public consultation until mid-March 2015 and in May 2015 the responses to queries raised during that consultation were published. The queries related to the methodology used for working out the figures particularly in relation to how 'turnover' of pitches had been applied. Turnover relates to the effect of a pitch being vacated by one resident and then becoming available for another occupant. As a result of these concerns an update was carried out with the final version published in November 2015. A further update was carried out in the summer of 2017.	To amend text to provide update information regarding the GTAA and also to remove text about the detail of the various stages of the plan.

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AM10	5.1	In paragraph 5.1 amend typographical error as follows: “.....conjunction with Core Strategiesy policies.....”	To correct error.
AM11	Paragraph 7.3	The Gypsy and Traveller Accommodation Assessment will be review every five years requirement for pitches will be assessed on a regular basis. All of the data collected as described above will feed into this five yearly review. The accommodation requirements for Travellers not meeting the PPTS definition will be assessed as part of the Core Strategy Review.	To update to explain that the accommodation need of travellers not meeting the PPTS definition will be addressed.