

# Herefordshire Local Plan

# Travellers' Sites Document



# Consultation Statement

# Part 1

November 2014

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## 1 Introduction

This statement outlines the methods of consultation and engagement undertaken between August and October 2014 on the Travellers' Sites Document, part of the Local Plan for Herefordshire. This period included a specific "Issues and Options Paper" consultation. For detailed analysis of the comments received to the consultation a separate report will be produced entitled 'Travellers Sites Document - Issues and Options Results Report'.

The consultation and engagement has followed the methods outlined within the adopted Herefordshire Statement of Community Involvement (SCI March 2007); a copy of the SCI can be found on the Council's website [www.herefordshire.gov.uk/localplan](http://www.herefordshire.gov.uk/localplan). The production of the document has also followed the regulations set out in the Town and County Planning (Local Planning) (England) Regulations 2012 which sets out how development plan documents should be prepared.

## 2 Preparing the Issues and Options Paper

The first stage in preparing the Travellers' Sites Document to accompany the emerging Herefordshire Local Plan Core Strategy was the preparation of a Sustainability Appraisal Scoping Report. This was consulted upon for the statutory 5 week period in compliance with the regulations<sup>1</sup>. This set the context and the objectives, the scope and the baseline of the appraisal process.

The comments received from the above scoping exercise as well as earlier consultations (namely on emerging Policy H4 of the Local Plan Core Strategy) and the existing evidence base (including Gypsy and Travellers Accommodation Assessments) were reviewed to establish the key issues and possible options and then devise the questions for the Travellers' Sites Document Issues and Options Paper. Issues concerning the accommodation needs of Travellers were set out in section 2, and then various options concerning the location, size and tenure of new sites for Travellers' accommodation (including Gypsies and Travellers and Travelling Showpeople) were set out in sections 5-7. Finally, possible questions to be considered as part of an Equalities Impact Assessment were set out in section 9. Full and up to date information on the evidence base supporting this topic is available on the council's website- see the "evidence base" section on the local plan page.

An internal Gypsy and Travellers Accommodation Assessment Working Group and the Gypsy and Traveller Strategy Group, made up of internal and external members were invited to give specialist advice and comments to the issues and options paper via meetings and e-mail.

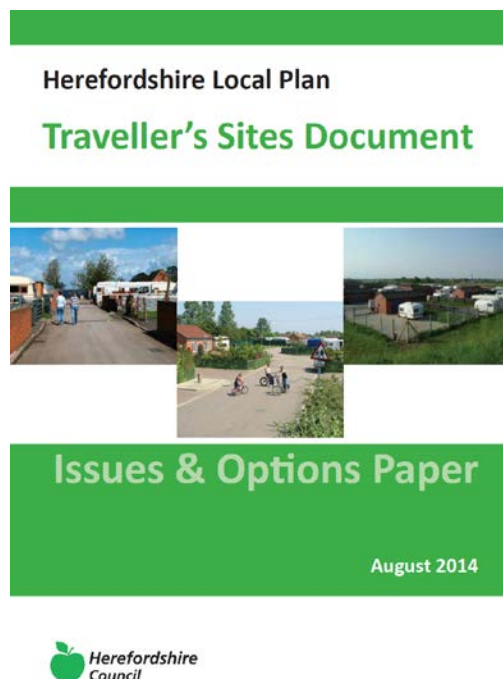
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<sup>1</sup> The Environmental Assessment of Plans and Programmes Regulations 2004

A Sustainability Appraisal (SA) report has been prepared for the issues and options stage of the Travellers' Sites Document. The SA is available online on the local plan website. A Habitat Regulations Assessment (HRA) Screening Report will also be prepared in consultation with a number of key bodies as site development proposals progress.

The Travellers' Sites Document Issues and Options Paper was reported to Cabinet Member on 13 August 2014 and approved for consultation. See Figure 1.

**Figure 1–Travellers' Sites Document Issues and Options Paper Front Cover**



### **3 How we consulted on the Travellers' Sites Document**

A total of 218 parish councils, interested parties, relevant organisations and individuals who had previously expressed an interest in the subject of Travellers' accommodation as part of the development of the Core Strategy were sent a prior notification letter which explained that the consultation on the Travellers' Sites Document was to take place, in accordance with Regulation 18 (1) (a) of the Town and Country Planning (Local Planning) (England) Regulations 2012. This was sent out at the beginning of August 2014 – see Appendix 1.

The consultation on the actual issues and options paper then took place from 21 August until 2 October 2014, with the same 218 interested parties being sent letters. Although the 2 October 2014 was publicised for responses, comments were received and taken into account after this date – see Appendix 2.

### **3.1 Questionnaire**

The invitation letter to make representations on the Travellers' Sites Document was sent out for the start date of the consultation – 21 August 2014 in accordance with Regulation 18 (1) (b) of the above regulations, 2012. Adjoining authorities and other organisations were sent a specific consultation letter asking about engagement in the “duty to co-operate” process – see Appendix 3. The specific consultation bodies, including English Heritage, Natural England and the Environment Agency and other interested parties were sent a letter regarding representations on the Sustainability Appraisal produced alongside the Travellers' Sites Document in accordance with the Environmental Regulations, 2004 –see Appendix 4. Packs of documents including a series of questions, response forms and sustainability appraisals were distributed to all the libraries within the county and the Council's Info centres. The Travellers' Sites Document, response form and Sustainability Appraisal were also made available online to download.

A total of 31 completed response forms, letters and e-mails were received; the majority from members of the public and parish councils. A copy of the response form is reproduced in Appendix 5.

### **3.2 Drop-in event**

A drop-in event was organised for interested parties at Holmer Church Parish Centre on Tuesday 9th September 2014 between 2pm and 4pm. The drop in event was advertised in the original consultation letter and posters were distributed to existing Traveller sites by the Council's Traveller Liaison Officer and sent to the Travellers Support Group representative for distribution. At the event interested parties were invited to view the issues and options documents, give some initial views on the issues and options and ask planning officers any questions.

## **4 How we publicised**

In line with the adopted SCI, a number of community involvement methods were used to help reach as wide an audience as possible.

### **4.1 Website**

The Council's website contains pages devoted to the Local Plan and the Core Strategy ([www.herefordshire.gov.uk/localplan](http://www.herefordshire.gov.uk/localplan)). These pages are regularly updated and contained the Travellers' Sites Issues and Options Paper, response form and sustainability appraisal. Links to the Travellers' Sites Document were included on the Council's Local Plan landing page to enable maximum exposure of the web pages relating to the document. The web address has been printed on all written material and in press releases.

During the time period of the consultation on issues and options, there were 494 hits on the Travellers' Sites Document webpage and 338 of these were unique visits.

#### 4.2 Posters

Posters were produced to advertise the consultation and particularly the drop in event in September. The majority of these were distributed to existing Traveller sites with the intention that they encouraged attendance at the drop-in event. Some were sent to the Hereford Traveller Support Group representative to distribute, with their agreement. A copy of the poster is shown in Figure 2.

Figure 2 – Image of drop-in event poster



**Come to a drop in event at Holmer Church Parish Centre on Tuesday 9<sup>th</sup> September 2014 between 2pm and 4pm.**

The Travellers' Sites Document sets out issues and options for looking at meeting the accommodation needs of Gypsies, Travellers and Travelling Showpeople in the county - now and into the future. It will form part of the Local Plan for Herefordshire.

**A round of consultation on this document is taking place between Thursday 21st August and Thursday 2nd October 2014.**



Information on how to comment is available at [www.herefordshire.gov.uk/local-plan](http://www.herefordshire.gov.uk/local-plan) and you can view the document online or at Customer Service Centres and Libraries during normal opening hours.


You can ring us on 01432 383034 to obtain a copy.

Or email: [ldf@herefordshire.gov.uk](mailto:ldf@herefordshire.gov.uk).

### 4.3 Adverts – Hereford Times

An advert was produced for the Hereford Times, which appeared within the 21 August 2014 edition. This helped to advertise the consultation and the drop-in event to a wider audience than just the letters mail-out. The advert is shown in Figure 3.

Figure 3 – Hereford Times advert



**TRAVELLERS' SITES  
DOCUMENT CONSULTATION  
TO START ON AUGUST 21st 2014**

Herefordshire Local Plan  
**Traveller's Sites Document**

Issues & Options Paper  
August 2014

**The Travellers' Sites Document sets out issues and options for looking at meeting the accommodation needs of Gypsies, Travellers and Travelling Showpeople in the county - now and into the future. It will form part of the Local Plan for Herefordshire. A round of consultation on this document is taking place between Thursday 21st August and Thursday 2nd October 2014.**

Information on how to comment is available at [www.herefordshire.gov.uk/local-plan](http://www.herefordshire.gov.uk/local-plan) and you can view the document online or at Customer Service Centres and Libraries during normal opening hours. You can ring us on 01432 383034 to obtain a copy, email [ldf@herefordshire.gov.uk](mailto:ldf@herefordshire.gov.uk) or come to a drop in event at Holmer Church Parish Centre on Tuesday 9th September 2014 between 2pm and 4pm.

## 5 Profile of respondents

The adopted SCI highlights a number of 'groups at risk of exclusion' from the planning process including Gypsies and Travellers. The Understanding Herefordshire report (2014) highlights that the proportion of residents within the county from ethnic minority groups is very low by national and regional comparisons. Although, it is difficult to specifically target individuals, many



groups / associations are included on the Core Strategy database relating to Gypsies and Travellers and will have received letters about the Travellers' Sites Document consultation. A poster advertising the consultation and drop-in event was also distributed to Traveller sites.

Of the 31 responses to the issues and options paper received:

- 2 were from adjoining authorities regarding the duty to co-operate
- 5 were from specific consultation bodies
- 2 were in response to the sustainability appraisal and
- 21 were received from parish councils and members of the public
- 1 response was received from the Traveller Support Group

## **6 Analysis of comments on the Travellers' Sites Document Issues and Options Paper and "call for sites" and drop-in event**

31 separate response forms/letters and emails were received to the questions raised in the consultation documents. A summary of the responses can be seen in a separate report called the 'Travellers' Sites Document Issues and Options Paper Results Report'. As part of this a spreadsheet will be produced for each of the questions within the questionnaire forming part of the Travellers' Sites Document highlighting responses, those given by specific consultees and those relating to the sustainability appraisal. The results report will be made available on the website.

Two responses were received to the "call for sites" request which was carried out as part of the issues and options consultation. These will be assessed as part of the site selection process which forms the next stage in the preparation of the Travellers' Sites Document.

The drop-in event, although not as well attended as hoped, resulted in some useful discussions between Herefordshire Council officers and members of the Traveller community. The general themes raised in these discussions will be reported on in the above results paper and be posted on the website.

## **7 What happens next?**

The results report will contain a column regarding how the consultation and engagement comments have influenced the development of the Travellers' Sites Document. This will be completed once the results of the latest update to the Gypsy and Traveller Accommodation Assessment (GTAA) (which is currently being undertaken by consultants) to identify need for new sites is known, as this will directly affect the progress of the Travellers' Sites Document.



It is also intended to hold a Members Workshop on the issue of finding sites for the Traveller community once the results of the GTAA evidence base are known, to further explore the issues and processes involved.

Actual site identification and selection to meet any identified need for the next 15 years (in accordance with national policy advice set out in “Planning Policy for Travellers Sites”) will then be carried out and any proposed sites presented in a Travellers’ Sites Document – Preferred Options Paper for further consultation and sustainability appraisal.

For up to date information on the progress of the Travellers’ Sites Document, please refer to the Council’s website at [www.herefordshire.gov.uk/localplan](http://www.herefordshire.gov.uk/localplan).

Prepared by: Jane Reeves  
Date: November 2014

## **Appendix 1 – Prior notification of intention to consult letter**

**Economy, communities  
and corporate**

**G Hughes**

Our Ref: LDF/Gypsies and Travellers/DPD

Please ask for: Jane Reeves

Direct Line / Extension: (01432) 383034

E-mail: [ldf@herefordshire.gov.uk](mailto:ldf@herefordshire.gov.uk)

Date as postmark

Dear Sir/Madam

### **Travellers' sites document – issues and options paper**

A Travellers' Sites Document – Issues and Options Paper is currently being produced and will be consulted upon shortly. A link to the website where you can obtain more information is set out below:

<https://www.herefordshire.gov.uk/local-plan>

The Travellers' Sites Document together with the emerging Core Strategy and other development plan documents will comprise the new style Local Plan for the county. The main purpose of the Travellers' Sites Document is to make site allocations/identify broad locations for search for accommodation for Gypsies, Travellers and Travelling Showpeople. The document is required in order to implement emerging Core Strategy Policy H4 and to meet national policy set out in "Planning Policy for Traveller Sites", March 2012 which requires planning authorities to provide for a deliverable 5 year supply of sites for the accommodation needs of Travellers and further sites/locations for beyond that time. The first stage in preparation of this document is to look at the "key issues" affecting the accommodation needs of the Traveller community and consider "options" of how sites can be identified. The Travellers' Sites Document – Issues and Options Paper will not identify specific sites at this stage.

It is intended that the document will be subject to a consultation period of 6 weeks starting towards the end of August 2014. You will be notified of the start date and documents to look at in due course. Following this consultation the representations received will need to be considered and any proposed sites incorporated into a "Preferred Options" stage. This will then form the basis for submission to the Secretary of State later next year.

Yours faithfully,

**Kevin Singleton**

Strategic Planning Manager

## Appendix 2 – General consultation letter

**Economy, communities  
and corporate  
G Hughes**

Our Ref: LDF/Gypsies and Travellers/DPD

Please ask for: Jane Reeves

Direct Line / Extension: (01432) 383034

E-mail: [ldf@herefordshire.gov.uk](mailto:ldf@herefordshire.gov.uk)

Date as postmark

Dear Sir/Madam

### **Travellers' sites document – issues and options paper**

Herefordshire Council is consulting upon a Travellers' Sites Document – issues and options stage. For the purposes of this document, Travellers are defined as Gypsies, Travellers and Travelling Showpeople. **The consultation will run from 21<sup>st</sup> August to 2 October 2014.** We are consulting on possible options of where to look for sites to meet Travellers' accommodation needs and detailed aspects of issues such as site size and tenure. No specific sites are considered at this stage. On adoption, the document will form part of the emerging Local Plan for Herefordshire. We welcome your views on this document.

There are 3 ways to comment on the document:

- 1) The preferred method is to make comments by filling in the questionnaire on the council's website [www.herefordshire.gov.uk/planning-and-building-control/planning-policy/travellers-sites-document](http://www.herefordshire.gov.uk/planning-and-building-control/planning-policy/travellers-sites-document) saving it as a word document and returning it to [ldf@herefordshire.gov.uk](mailto:ldf@herefordshire.gov.uk). This method is more environmentally friendly and allows us to analyse responses faster.
- 2) You can make comments in hard copy. The questionnaire can be printed from the website and then completed by hand and returned (no stamp required) to: Travellers' Sites Document, Strategic Planning, Herefordshire Council, PO Box 230, Blueschool House, Hereford, HR1 2ZB. Alternatively, if you would like a copy of the questionnaire, please call us on 01432 383034.
- 3) If you do not wish to complete the questionnaire and wish to write a letter, please always make sure you state which specific part/option of the Travellers' Sites Document your comment relates to. This will assist us in analysing your comments.

You can find out more information on the council's website at [www.herefordshire.gov.uk/localplan](http://www.herefordshire.gov.uk/localplan) or at any info centre or library in the county. After the consultation, the council will consider all the comments received before producing

a preferred options stage of the document. Please call the strategic planning team on 01432 383034 if you have any queries.

Yours faithfully

**Kevin Singleton**

**Strategic Planning Manager**

## Appendix 3 – Duty to co-operate letter

Economy, Communities and Corporate Directorate  
Geoff Hughes (Director)

Our Ref: Travellers' Sites Document

Please ask for: Jane Reeves

Direct line: (01432) 383034

E-mail: [ldf@herefordshire.gov.uk](mailto:ldf@herefordshire.gov.uk)

Date as Postmark

Dear Sir/Madam

### **Travellers' sites document – issues and options paper: “duty to co-operate**

Herefordshire Council is consulting upon a Travellers' Sites Document – issues and options stage. For the purposes of this document, Travellers are defined as Gypsies, Travellers and Travelling Showpeople. **The consultation will run from 21<sup>st</sup> August to 2 October 2014.** We are consulting on possible options of where to look for sites to meet Travellers' accommodation needs and detailed aspects of issues such as site size and tenure. No specific sites are considered at this stage. On adoption, the document will form part of the emerging Local Plan for Herefordshire. We welcome your views on this document as an adjoining authority.

As part of the “duty to cooperate” in meeting S33A of the 2004 Planning and Compulsory Purchase Act (as amended), we would particularly like to have your comments on the following issues:

1. particular reference to any cross boundary movements/issues you are aware of affecting the Traveller community which could affect transit site provision;
2. please can you confirm at what stage your own authority is at in meeting the national policy requirements set out in Planning Policy for Travellers, 2012 and confirm that you are intending to meet your authorities' Traveller accommodation need within your own administrative boundaries; and
3. whether you would like to take part in further discussions with Herefordshire Council on this topic either as a specific issue group, or as part of a wider cross boundary issues forum.

You can find out more information on the council's website at [www.herefordshire.gov.uk/localplan](http://www.herefordshire.gov.uk/localplan). After the consultation, the council will consider all the comments received before producing a preferred options stage of the document. Please call Jane Reeves in the strategic planning team on 01432 383034 if you have any queries.

Yours faithfully

**KEVIN SINGLETON**

**TEAM LEADER – STRATEGIC PLANNING**

## **Appendix 4 – Sustainability appraisal consultation letter**

**Economy, Communities and Corporate Directorate**  
Geoff Hughes (Director)

Our Ref: Travellers' Sites Document

Please ask for: Jane Reeves

Direct line: (01432) 383034

E-mail: [ldf@herefordshire.gov.uk](mailto:ldf@herefordshire.gov.uk)

Date as Postmark

Dear Sir/Madam

### **Sustainability Appraisal of the Travellers' Sites Document – Issues and Options Paper**

Herefordshire Council are working towards preparing a new development plan document relating to meeting the accommodation needs of Travellers in the county – a Travellers' Sites Document. In accordance with national and European legislation, a Sustainability Appraisal (SA) has been prepared to accompany the first issues and options stage consultation document.

Attached is a copy of the SA report and you are invited to comment on this document by 25<sup>th</sup> September 2014.

If you have any questions regarding the contents of the documents please do not hesitate to contact me.

Yours faithfully

**KEVIN SINGLETON**  
**TEAM LEADER – STRATEGIC PLANNING**

## Appendix 5 – Response Form

### Response Form for Travellers' Sites Document - Issues and Options Paper

#### Section 2

- 1) Are there any other key issues affecting accommodation for Travellers that should be addressed in the Travellers' Sites Document?

#### Section 5

- 2) Of the permanent residential pitch options outlined which one would be the best approach or could a combination of options be used?

- 3) Are there any other realistic and reasonable ways in which future permanent residential pitch requirements may be met? If so, please expand.



- 4) How should formal transit provision be provided for in Herefordshire?
- a) one or two single sites close to a main settlement or
  - b) numerous smaller stopping places along well used main routes or
  - c) additional space for temporary accommodation for people visiting site residents at new permanent Travellers sites identified through the Travellers' Sites Document.

- 5) Are there any other "approach" options for transit site provision?

- 6) Is there a need to provide additional capacity for Travelling Showpeople in the county?

- 7) Can you suggest any sites that you consider suitable for use as Traveller pitches (please refer to the criteria in emerging Core Strategy Policy H4 in Appendix 2 of the Travellers' Sites Document – Issues and Options Paper).

If so, please detail briefly in the box below and submit fuller details using the “call for sites” form reproduced at Appendix 3 of the Travellers' Sites Document and on the website.

- 8) Should council-owned land be considered in any site search?

## Section 6

- 9) In terms of the optimum size of new Travellers' sites, should the council:
- a) look to allocate larger permanent sites of say not more than 10 pitches? Or
  - b) do you consider that all permanent residential sites should generally be small e.g. not more than 1 or 2 pitches?

- 10) Which option for providing for Travellers' affordable accommodation needs do you consider is the best approach?

**Section 7**

- 11) Do you think all the detailed policy considerations relating to Travellers' sites development listed in section 7 are the right ones?

- 12) Are there any other considerations that need to be identified in section 7?

**Section 8**

- 13) In relation to delivery, should the council or a registered provider be responsible for acquiring and managing the required level of pitch provision themselves and if so, how should this be funded?

- 14) To what extent is it reasonable and appropriate to rely on Travellers delivering the required level of pitch provision through acquiring their own private sites through the planning system?

- 15) How realistic is it to expect the development industry to provide sites as part of larger residential developments? How should we define “larger” in terms of defining a threshold to when such a policy would apply?

## Section 9

- 16) Have we identified the main equality issues in the proposed Equalities Impact Assessment outlined above?

- 17) Do you have any other suggestions to produce a robust Equalities Impact Assessment or to assist in monitoring the outcome of the Travellers’ Sites Document e.g. data sources?

**Contact details for acknowledgement**

Name

Organisation

Address

E-mail address

LDF Number

(if known)

**Thank you for completing this questionnaire. Please return to:**

**Strategic Planning**

**Blueschool House**

**Blueschool Street**

**Hereford**

**HR1 2ZB**

Or by email to: [ldf@herefordshire.gov.uk](mailto:ldf@herefordshire.gov.uk)

**The closing date for the consultation is midnight on 2 October 2014.**