

Herefordshire Local Plan Travellers' Sites Development Plan Document

Consultation Statement

November 2017



Travellers' Sites DPD Preferred Options Consultation Statement

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1.0 Introduction

1.1 The purpose of this document is to explain how the council has complied with its Statement of Community Involvement and Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 in the arrangement of this consultation.

1.2 This statement sets out the methods Herefordshire Council has used to engage with both stakeholders and the community in the preparation of the Travellers' Sites Development Plan Document between 25 July and 19 September 2016.

1.3 It details the following information for consultation on the Preferred Options stage of the Development Plan Document, which when adopted will become part of the Herefordshire Local Plan.

- Which bodies and persons were invited to make representations
- How those bodies and persons were invited to make representations
- How information was made available to be viewed
- A summary of the main issues raised through representations
- How those issues have been addressed in the Development Plan Document

1.4 The following table shows the different stages of preparation and consultation so far for the Travellers' Sites Development Plan Document.

Date	Stage
18 June to 23 July 2014	Sustainability Appraisal Scoping Report – 5 week consultation
August to October 2014	Call for Sites
21 August to 2 October 2014	Issues and Options Paper – 6 week consultation
17 December 2015 to 14 February 2016	Call for Sites
25 July to 19 September 2016	<ul style="list-style-type: none">• Preferred Options Paper – 8 week consultation.• Sustainability Appraisal and Habitats Regulation Assessment – 8 week consultation• Further Call for Sites

2.0 Preparation of the Preferred Options Document

- 2.1 The Preferred Options Consultation Document is a stage in the preparation of the Travellers Sites Development Plan Document (DPD) The DPD will form part of the Herefordshire Local Plan. The purpose of the consultation was to:
- explain the background to why we need to find space for more pitches and plots for travellers;
 - set out where new authorised traveller sites may be located in the County;
 - invite comments on the suitability of these sites and
 - invite suggestions as to what issues should be covered by new policies.
- 2.2 The preferred options consultation document has been prepared in the context of the National Planning Policy Framework (2012) and the Planning Policy for Traveller Sites (August 2015). It is informed by the Herefordshire Gypsy and Traveller Accommodation Assessment (November 2015) which forms part of the evidence base and was prepared by an independent consultation
- 2.3 The findings of the Issues and Options Consultation that took place in 2014 also informed the preparation of the preferred options document.

3.0 Consultation Methodology

- 3.1 The council has an extensive consultation database which includes individual residents, developers, businesses based across the county, parish councils, community and voluntary groups, infrastructure providers, neighbouring authorities, government agencies and elected members.
- 3.2 Consultation with stakeholders, the local settled community and the local Gypsy and Traveller community is an essential part of the plan making process. The council has used a range of methods to engage with all potentially interested parties, in order to ensure that all have the opportunity to make a representation.
- 3.3 The purpose of the consultation was to invite views on the proposed new and extended sites detailed in the draft document, the Gypsy and Traveller accommodation assessment that sets out the number of pitches required, the use of transit pitches, as well as the Sustainability Appraisal and Habitat Regulations Assessment Reports.
- 3.4 Stakeholders and local community members have been informed by email, in writing or face-to-face about ways to get involved in the consultation. A variety of methods to respond were given, both on and offline in order to reach the broadest audience possible.
- 3.5 The following approaches have been undertaken:

- Direct mailing and emailing to interested contacts on the database.
- Circulation of hard copy information to Gypsy and Traveller communities living on both local authority sites and private sites via Council Officers including face-to-face discussion
- Information made available at libraries and information centres across Herefordshire.
- Press releases sent to media across Herefordshire
- Posters displayed on parish notice boards across the county
- Social Media
- Cabinet Members' newsletter
- The Council's website
- Drop-in sessions at key destinations
- Work with Herefordshire Traveller Support to raise awareness amongst the community.

4.0 The Consultation

- 4.1 The Council published the draft Travellers' Sites Development Plan Document for consultation from 25 July to 19 September 2016.
- 4.2 The document set out the preferred options for sites to help meet the need for Gypsy and Traveller residential and temporary pitches and Travelling Showpeople plots. The specific requirements have been identified through research commissioned by the council to produce the Gypsy and Traveller Accommodation Assessment. The total pitch and plot numbers in the report are intended to meet the need up until 2031. However the identified sites included in the consultation document refer specifically to the first 5 years of the plan period.
- 4.3 Six hundred and twenty seven letters and one thousand and ninety four emails were sent to Herefordshire Parish Councils, specified consultees, all those who had registered interest earlier in the preparation of the document, stakeholders, neighbouring authorities, prescribed bodies agents and land owners notifying them of the details and inviting them to take part in the consultation.

- 4.4 An overview of specified consultees and organisations written to can be found in Appendix 1 of this document.
- 4.5 The correspondence sent included an overview of the purpose of the final policy document, details of where to find all the gathered evidence and background information and how to make a representation either online or on a printed paper copy.
- 4.6 The following documentation was made available to download on the dedicated webpage www.herefordshire.gov.uk/traveller-sites-consultation and in hard copy at all eleven libraries and information centres across the county.
- Preferred Options Development Plan Document
 - Sustainability Appraisal Report
 - Habitat Regulations Assessment Report
 - Frequently Asked Questions sheet
 - Questionnaire
 - Diversity Monitoring questionnaire
 - Call for Sites Submission form
- 4.7 The questionnaire made reference to the main individual aspects of the draft document, asking a specific question in relation to each, as well as inviting further comment.
- 4.8 Each site listed had a question relating to its suitability and if not deemed suitable by the consultee, it included an invitation to make an alternative suggestion with reference to the call for sites form.
- 4.9 The Council website featured the consultation in the 'New and Featured' pages section on the homepage. As well as this, the consultation was also publicised through the Council Facebook page and Twitter feed, with regular updates and reminders about where to find more information and invitations to come along to the drop-in sessions.

4.10 The following table details each method used to distribute information:

Method	Date
<p>Email</p> <p>Specified statutory consultees, Gypsy and Traveller support groups, previous Gypsy and Traveller contacts, parish council clerks & neighbouring authorities</p> <p>It was recognised that not all parish councils would meet within the consultation period. Therefore representations received from parishes following the close of the consultation were accepted.</p>	<p>Notification of consultation</p> <p>Sent Friday 22 July</p> <p>Reminder sent part way through consultation</p>
<p>Letter</p> <p>As above to contacts that have not provided an email address.</p> <p>Members of Parliament</p>	<p>Notification of consultation</p> <p>Sent Friday 22 July</p>
<p>Facebook</p>	<p>Notification of consultation start posted on page with direct link to web page followed by regular updates throughout</p>
<p>Twitter</p>	<p>Notification of consultation start on page with direct link to web page followed by regular updates throughout</p>
<p>Press release announcing the consultation start and finish dates as well as a brief explanation about the document and information on where to find out more</p>	<p>Sent 21 July to:</p> <ul style="list-style-type: none"> • Major County media • Travellers Times • Friends, Families & Travellers • The Traveller Movement • Traveller Space
<p>Website</p>	<p>Featured on HCC newsreel throughout consultation with direct link to consultation page</p>
<p>Radio</p>	<p>Press release sent to local stations</p>
<p>Council Members' Newsletter</p>	<p>Information sent for inclusion in weekly newsletter. Sent Friday 22 July (Featured in newsletter Wednesdays 27 July)</p>
<p>Councillors for parishes with a site identified in their administrative area</p>	<p>Sent personal email with detailed information sent Friday 22 July</p>
<p>Work with Herefordshire Traveller Support to raise awareness amongst community</p>	<p>Notification and key information sent prior to consultation start Friday 22 July</p>
<p>Paper copies made available at information points / libraries across the county</p>	<p>Posted to each with instructions Friday 22 July. Followed up to ensure information was on display and address any queries from staff.</p>

Method	Date
Face to face discussion with Traveller community on local authority sites	Carried out by Community Wellbeing and licensing officers throughout consultation
Drop in sessions at key destinations	Holmer Church Parish Hall – 5 Sept Larruperz Centre, Ross on Wye – 8 Sept Leominster Community Centre – 12 Sept

As well as on the Herefordshire Council website and social media, the consultation was featured by Hereford Times, Ledbury Reporter and Ross Gazette, Worcester News, The CLA, Friends, Families and Travellers, and Travellers' Times.

In addition to these events a parish council drop in session was held on February 6 2017 to provide further information to parish councils on the proposals.

5.0 Responses to the Consultation

5.1 One hundred and forty three responses were received, of which one hundred and five were via the consultation page online. Among the contributors were:

- Local Ward Members
- Parish and Town Councils and Councillors
- Neighbouring Authorities
- National Federation of Gypsy Liaison Groups
- Preservation of Rural Beauty
- NLP Planning
- Hereford Enterprise Zone
- Network Rail
- Leominster Civic Society
- Mercia Waste Management
- Welsh Water
- Historic England
- Bourne Leisure
- Petition of 94 small businesses on Southern Ave, Leominster
- Various local business owners
- Individual residents

6.0 Summary of changes made to the DPD following consultation

6.1 A summary of the responses can be found in Appendix 5. The responses included recurring themes which were used in response to more than one of the questions. Not all of the representations were directly related to land use planning issues e.g. frequent comments were made that respondents could

not understand the need to provide any pitches or the preference to live on pitches rather than in houses. The following paragraphs set out how other representations have been taken into account based on key themes and individual site by site basis. Not all the sites that were included in the preferred options have been taken forward into the pre-submission draft, mainly because of the reduced need for new pitches identified in the GTAA 2017 update. The sites that have been included each have a related policy which addresses key comments raised during the consultation stage. Furthermore the two general policies relating to Traveller Pitches and Traveling show people plots have incorporated the findings of both the public consultation and the sustainability appraisal.

6.2 *The number of pitches required for residential and temporary stopping places and the number required for Travelling Showpeople*

6.3 There was disagreement with the conclusions of the GTAA. Of those that disagreed, the majority thought the figures were too high; although some objectors felt that they were not high enough and therefore did not cater for the needs of the county's traveller community.

6.4 The Council commissioned an update to the GTAA in July 2017 in order to provide a more up to date evidence base for the preparation of the plan. This updated GTAA provided a revised evidence base on which the pre-submission document is based. This update has considered two types of need in relation to the PPTS definition and that relating to cultural /ethnic need. This addresses those representations that questioned the validity of the GTAA in relation to the publication of the revised Planning Policy for Traveller Sites in August 2015.

6.5 *Temporary Stopping Places*

6.6 The principle of providing a temporary stop over place has been retained in the pre-submission plan although it now includes one site for this purpose. There was support for this type of provision from a number of respondents; in particular West Mercia Police have reiterated the need for this to enable them to exercise their powers to address the issue. It is considered that such a site will be for the benefit of both travellers and the local community. The majority who were not in favour were concerned about the management and policing of the temporary sites. Additionally some were against such provision because of past experiences following encampments. It is believed that by providing a site with adequate sanitation and waste disposal facilitates that this will help address some of the issues raised by respondents. It was suggested by one respondent that a transit site with permanent facilities should be provided instead of a temporary stopping place. Consideration has previously been given to this but the multi-agency Herefordshire Gypsy Roma

Traveller Strategy Group favoured the latter approach and there was no new evidence to change that approach.

6.7 *Length of stay on Temporary Stopping Place*

6.8 A question was asked about how long individual groups of travellers should be allowed to stay on these sites. There was a mixed response to this with some respondents stating that it should be shorter and others stating that a month would be a reasonable time. It is considered that a good approach to this is to decide on a case by case basis as part of the management of the site using examples of good practice from elsewhere in the country, in particular the negotiated stopping approach adopted in Leeds.

6.9 *Suggestions received of other sites for temporary stopping places:*

- Bringsty Common - However no specific site was identified. It is large area and it is not clear from the limited information what is being suggested. Being Common Land there are a number of restrictions that would apply to prevent such use
- Council car parks; these are often where the unauthorised encampments take place and it is not considered to be a suitable dual use. The council is not aware of any surplus car parks for this use.
- Junction of the A49 and the Monmouth road below the Kingsthorpe bus shelter This is an area of common land in private ownership
- Land adjacent to a site in Much Birch along A49. It is assumed that the respondent is referring to an existing private residential site in the area described. The adjoining land is in private ownership and has not been submitted as part of the call for sites proposal
- Suggest a purpose built site within the construction of the new relief road. The route of the Hereford relief road is not defined and therefore it would not be possible to include such an option at this stage.
- The old warehouse site past the cattle market by Labels roundabout. There are no available sites in this location.

6.10 *The identification of Travelling Show people sites.*

6.11 There was a mixed response to this. Many felt that there was no need for such sites. However the 2015 and 2017 GTAs identify a requirement up to 2031. Two sites were suggested as having potential for this purpose as follows:

- Land at Jays Green / Old Council Yard – This is no longer in ownership of the council and is not available for this use.

6.12 Following consultation the Council has engaged with representatives of the regional office of the Showmans Guild. An agreed way forward in the absence of allocated sites was to include an enabling policy for such sites to come forward based on the Guild's model planning policy.

6.13 *Temporary Stopping Place Broadmeadow Yard, Ross-on-Wye.*

6.14 There were a number of site specific comments about this site e.g. being too central, impact on highways, local businesses and tourism. There was further technical work to be carried out on some of these issues. However concerns about the impact of sharing the access with local businesses meant that this site was not been taken forward into the pre-submission draft.

6.15 *Temporary Stopping Place A49, Leominster*

6.16 There were a number of objections received to this site including the principle of providing such a site at a gateway location, impact on businesses and highways. Many concerns were raised that the site would not be properly managed and this would have detrimental outcomes. The Council believes that many of these concerns can be addressed by the provision of an authorised site itself and the management strategy for it which is being developed by the Licencing Team. Policy TS3 sets out a number of policy criteria which address the issues raised.

6.17 The Council has liaised with the Environment Agency regarding flooding who have confirmed with them that detailed modelling shows that the area is in fact outside flood zones 2 and 3.

6.18 The use of nearby laybys was suggested as an alternative to this site. However discussions with the Highways Agency confirmed that this is not a viable alternative. The Council is continuing to work with the Highways agency concerning the access to the site off the A49.

6.19 Network rails specified requirements for fencing residential development next to the operational railway and this has been incorporated into policy TS3.

6.20 *Land adjacent to Whitfield Coppice Trumpet.*

6.21 This site was included in the preferred options plan as having potential for residential pitches. There were a number of objections to this site based on a number of concerns as outlined in the summary. Following consultation a number of technical pieces of work were carried out to address some of these issues in relation to flood risk, contaminated land and highways issues. There

were still unresolved issues in relation to highway safety and given the revised figures in the GTAA 2017 update the site has not been taken forward to the pre-submission publication stage.

6.22 Extension of Orchard Caravan Park at Watery Lane, Lower Bullingham.

6.23 Overall there was more support than objection for the additional two pitches at this site. A concern was expressed that the site would become overcrowded but as this is an extension to the site rather than an intensification this is not considered to be the case. Concern was raised about the safety of pedestrian access to and within the site. However there is an existing pedestrian and cycling link between Watery Lane and Twyford Road which links to Straight Mile where there is a bus stop. This route is identified in the Rotherwas Travel Plan 2014 as having potential for improvement and there are also plans for this link to form part of the bus route to serve the new housing allocated in Policy H6 of the Core Strategy at Lower Bullingham.

6.24 Land near Sutton St Nicholas

6.25 There were a number of objections to the proposal for this site as outlined in appendix 5. Many of these related to its open countryside location which is in principle acceptable within the criteria of Policy RA3. Further technical work was carried out in relation to highways (speed assessment) and flood risk. However given the revised figures in the GTAA 2017 update the site has not been taken forward to the pre-submission publication stage as it was considered preferable to make more efficient use of land by meeting the reduced requirement through site extensions and intensifications.

6.26 Extension to the Local Authority site at Pembridge.

6.27 Overall there was more support for this proposal than objection. There were representations raised concerning the management of the site which are being addressed by the Council's Travellers team. There were concerns about the safety of children in relation to the adequacy of the sewage treatment works. However this has been assessed and is considered to be in good working order. The parish council requested that the Council reconsider an extension to the east of the existing site rather than to the south. This representation together with findings of the flood risk assessment of the area to the south resulted in the identification of an extension to the east of the existing site in the pre-submission document.

6.28 Openfields Caravan Site, Bromyard.

6.29 Overall there was more support for this proposal than objection. Some of the objections relate to management issues which are being addressed through a multi-agency working group and are considered to have improved. The

redevelopment of the two pitches would prevent that land being used for inappropriate uses. Concerns were raised about the impact on the extension of a heritage asset. However given that this is an intensification within existing site boundaries and there is no direct visibility this is not considered to be an issue.

6.30 Romany Way Caravan Site, Grafton.

6.31 Overall there was more support for this proposal than objection. Concern was expressed that the additional pitch would make the site too cramped. However the suggestion for an additional pitch was made by the residents themselves. The location of the additional pitch has moved to the former warden's office to allow the retention of the existing play area.

6.32 **Other Issues raised:** In addition to the site specific comments that were raised comments were invited on what issues policies in the DPD should refer to. Policies TS1 and TS2 have been drafted with reference to the representations received to cover environmental protection issues and the requirements for sites in terms of amenity and facilities. The following paragraphs summarise some of the additional points that have not already been covered above.

6.33 **Longer term supply of sites:** A number of representations were made about this but given the findings of the revised GTAA there is not currently a need to identify sites beyond the five year supply.

6.34 **Funding and delivery:** The funding of the new sites was questioned. Although the financing of the proposals is not a matter for consideration for the Travellers' Sites DPD, detailed financial implications are being assessed separately for consideration in the Council's capital programme process. Confirmation has now been received from the Homes and Community Agency that match funding is potentially available to apply for from the Shared Ownership and Affordable Homes Programme 2016 – 2021. •

6.35 **Sites in the AONB** Representation from the AONB unit stated that there should be specific reference to no adverse impacts in the AONB. The site in Ross on wye is not included in the pre-submission website. None of the other sites are located within an AONB. Should any applications come forward for sites within the AONB they will be considered against Policy LD1 of the Herefordshire Core Strategy. The AONB units will be consulted in such cases.

6.36 **Historic environment** – It was suggested that policy guidelines are amended to ensure the historic environment is properly considered. Whilst reference to

the historic environment has been included the Sustainability Appraisal has identified a further need to strengthen this policy.

7.0 Appendices

Appendix 1 – Consultees

The Town and Country Planning (Local Planning) (England) Regulations 2012 set out those bodies that the Council must consult with when preparing plan documents and planning applications.

Organisations and Groups targeted include central, regional and local Government organisations, adjoining local authorities, statutory bodies such as Highways England and utility companies, community, voluntary, resident and interested groups, members of the public, Parish/Town Councils, local businesses, developers and agents.

Appendix 2 – Letter

Travellers Sites Development Plan Document Preferred Options – Public Consultation

Herefordshire Council is preparing a Travellers Sites Development Plan Document which when adopted will form part of the Herefordshire Local Plan. This Plan will identify sites to provide for the assessed accommodation needs of Gypsies, Travellers and Travelling Showpeople.

Public consultation on this document starts on Monday 25 July and finishes on Monday 19 September 2016.

The Consultation document puts forward a number of possible sites. This allows the opportunity for open debate about the most suitable locations for this purpose. No final decisions on which locations will be used have been taken. This is your opportunity to let us know your views on the sites as well as suggesting other possible sites.

The Preferred Options Document, accompanying documents and on-line questionnaire are available at www.herefordshire.gov.uk/planning-and-building-control/planning-policy/travellers-sites-document

Hard copies of the documents are also available to view at libraries and customer service centres across Herefordshire. Paper copies of response forms are also available at these locations.

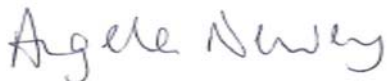
A number of drop-in events will be held in early September. Details of times and venues will be posted on our website.

The council is also inviting suggestions of other sites to be put forward for consideration to fulfil projected requirements for 2020 onwards and a form for this purpose is available on the website.

Please send your comments to us by 19 September 2016 by completing the online or paper questionnaire. However if you prefer you can email your comments to ldf@herefordshire.gov.uk or send them by post to Planning Policy Team, Herefordshire Council, Blueschool House, Hereford HR1 2LX

For more information please go to: www.herefordshire.gov.uk/planning-and-building-control/planning-policy/travellers-sites-document or contact 01432 260137/383357

Yours sincerely



Angela Newey
Senior Planning Officer
01432 383637

Appendix 3 – Response Questionnaire

Traveller Sites Document – Preferred Options Public Consultation 25 July – 19 Sept 2016

Please return your completed form by 5pm on Monday 19th September 2016

By email ldf@herefordshire.gov.uk

Or post Forward Planning
PO Box 230
Blueschool House
Hereford
HR1 2ZB

Responses will be published following the close of consultation.

Please note that any information you provide will be held and used in accordance with the Data Protection Act 1998 for the purposes set out above. It will not be shared with any third parties. Any comments provided may be included in an anonymous form in any published results.

Any views considered to be racist and/or personally abusive will be disregarded.

If you require further information or assistance, please contact the Planning Policy Team. Tel: 01432 260137

(Please refer to section 6 of the Development Plan Document, when answering the following questions)

Do you agree with the number of pitches required for residential and temporary stopping places and the number required for Travelling Showpeople?

- Yes
- No
- Not sure

If no, please explain.....

.....

Do you agree that we need to find sites for the 18 pitches arising from families living in houses, given the revised definition of Travellers in the Government Planning Guidance for Travellers?

- Yes
- No
- Not sure

If no, please explain.....

Do you agree with the plan to provide stop over places with temporary facilities?

Yes

No

If no, please explain.....

.....

Do you agree that the time spent on these sites should be limited to 14 days?

Yes

No

If no, please explain.....

.....

Can you suggest any other sites that are available and suitable for temporary stopping use?

Yes:

(If you have more detail, please complete the site submission form)

No

Given the low number of required plots for Travelling Show people, do you think there is a need for extra plots to be identified in the plan?

Yes

No

If no, please explain.....

.....

Can you suggest any suitable sites which are likely to be available for this use?

Yes:

(If you have more detail, please complete the site submission form)

No

(Please refer to section 8 of the Development Plan Document, where there are location plans, when answering the following questions)

Site number 1

Do you agree that land adjacent to Broadmeadow Yard, Ross on Wye could be a suitable location for a temporary stopping place?

- Yes
No

If no, please explain.....
.....

Site number 2

Do you agree that land at A49 roundabout near Leominster could be a suitable location for a temporary stopping place?

- Yes
No

If no, please explain.....
.....

Do you have any suggestions of other sites for use as temporary stopping places?

Yes:
(If you have more detail, please complete the site submission form)

- No

Site number 3

Do you agree that land adjacent to Whitfield Coppice, Trumpet could be a suitable site for a residential traveller site?

- Yes
No

If no, please explain.....
.....

Site number 4

Do you agree that an extension to Orchard Caravan Park at Watery Lane, Lower Bullingham could be a suitable option for two residential pitches?

- Yes
No

If no, please explain.....
.....

Site number 5

Do you agree that land near Sutton St Nicholas could be a suitable site for a residential traveller site?

- Yes
- No

If no, please explain.....

Site number 6

Do you agree that an extension to the local authority site at Pembridge could be suitable for more residential pitches?

- Yes
- No

If no, please explain.....

Site number 7

Do you agree that two additional residential pitches on Openfields Caravan Site, Bromyard is a suitable option?

- Yes
- No

If no, please explain.....

Site number 8

Do you agree that an additional residential pitch on Romany Way Caravan Site, Grafton is a suitable option?

- Yes
- No

If no, please explain.....

Do you have any suggestions of alternative or additional sites to help meet the need for pitches and plots in Herefordshire?

Yes:
 (If you have more detail, please complete the site submission form)

- No

Should any of these sites be considered as affordable Traveller sites?

- Yes
- No

If no, please explain.....

.....

(Please refer to sections 9 and 10 of the Development Plan Document when answering the following questions.)

Do you agree with the approach to the longer term supply of sites?

- Yes
- No

If no, please explain.....

.....

(Please refer to section 11 of the Development Plan Document when answering the following questions)

Do you agree with the issues identified for consideration in section 11.2?

- Yes
- No

If no, please explain.....

.....

Are there any other issues that should be included in the policy?

Yes

.....

No

Are there any other policies that should be included in the document?

Yes

.....

No

Do you have any comments on the Sustainability Appraisal (SA) and/ or the Habitats Regulations Assessment (HRA)?

Yes

.....

No

Do you have any other comments on the consultation document that are not covered by these questions?

Yes

.....

.....

No

Please use additional sheets of paper if you need extra space for comment on any of the questions.

We are also inviting people to provide suggestions of additional sites that may not already have been considered.

If you would like to suggest a site, please use the site submission form or for more information please go to:

www.herefordshire.gov.uk/planning-and-building-control/planning-policy/travellers-sites-document

Please complete your contact details.

Name:

Address:

.....

.....Postcode.....

Tel No:

Email:

How did you hear about the consultation?

Email

Letter

Newspaper If so which one?

Council website

Social Media

Other

If social media or other please specify:

In order to help us ensure that our services are accessible to all, we would appreciate it if you could take the time to complete the separate equality and diversity monitoring form.

It will only be used for the purpose of statistical monitoring, treated as confidential and **not** used to identify you.

Would you like to continue receiving information about forthcoming policy preparation and consultation?

Yes

No

www.herefordshire.gov.uk/traveller-sites-consultation

News release

PR xxx/16

Xx July 2016

Authorised Travellers' sites public consultation launches

Herefordshire Council has launched a public consultation on potential new sites and site extensions for Gypsies, Travellers and Travelling Show People, as part of the preparation of the Herefordshire Local Plan Traveller Site policy.

Research carried out to assess current and future accommodation requirements of Gypsies, Travellers and Travelling Show People has identified a need for additional authorised and transit pitches. As a result, action is being taken to address the shortfall of available sites for those needing a base in Herefordshire as well as those travelling across the county.

Detailed studies have identified the level of need in our district as being 19 permanent pitches, 5 for Travelling Show People and 3 temporary stopping pitches in the first five years of the plan.

The locations under consideration, following the 'call for sites' that ran from December 2015 to February 2016, are:

- Ross on Wye
- Leominster
- Lower Bullingham
- Bromyard
- Trumpet/Pixley
- Pembridge
- Sutton St Nicholas
- Grafton

The establishment of transit pitches will enable the movement of Travellers through the county to be managed more harmoniously, providing greater certainty for Travellers and local residents.

The council is still inviting land to be put forward for consideration of possible new sites as further sites will be required for 2020 onwards.

The consultation runs from Monday 25 July to Monday 19 September 2016 and can be found at www.herefordshire.gov.uk/traveller-sites-consultation

Hard copies can also be viewed at information points such as libraries and customer service centres across Herefordshire.

The consultation featured in various newspapers in hard copy and on websites:

The screenshot shows the homepage of 'The Ross Gazette'. The main article is titled 'Land near Broadmeadow Yard in Ross-on-Wye identified as potential site for Travellers'. The article text states: 'An area of land, adjacent to Broadmeadow Yard in Ross-on-Wye, has been identified by Herefordshire Council as a potential stopping place for Travellers. It has been suggested that the use of this site, which would be located in close proximity to Morrisons supermarket, would be a temporary stopping place for members'. A map titled 'Land adjacent to Broadmeadow Yard, Ross on Wye, Herefordshire' shows the location. A social media widget for Samsung Mobile is visible on the right, and a weather/traffic widget is at the top right.

This collage contains several items:

- Cannabis possession:** An article about Michael James Harwood, 38, of Pigs Alley, Ross-on-Wye, who pleaded guilty to possession of cannabis at Hereford Magistrate's Court on July 21st.
- Failure to keep a dog under proper control:** An article about Sean Joseph Murphy, 30, who was charged with failing to comply with a previous order, made on January 20th, 2014, to keep a dog under proper control.
- Man pleads guilty to exposing genitals:** An article about David Hopkins, age 74, who was conditionally discharged, and fined, after pleading guilty to exposing his genitals between October 10th, 2015 and March 29th, 2015.
- Land in Ross could be a new site for Travellers:** A central article detailing the council's identification of a potential site near Broadmeadow Yard. It mentions that the site is in flood zone 3 and that a further assessment will be carried out. It also notes that the council is considering other sites around the county.
- Advertisements:** Advertisements for 'Your local print shop...', 'Architectural Plans Printed or Copied in house', 'Croft Court' (01989 600443), and 'Quality Flooring' (Ross On Wye Flooring) are included.

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CONCERNS have been raised about a proposed travellers site in **Ross-on-Wye**, which councillors said is too near the town centre.

At the monthly Ross-on-Wye Town Council meeting, councillors said they did not support the proposed site for travellers on land next to Broadmeadow Yard in Ross, next to Morrisons.

The site has been put forward as part of the preferred options in a travellers consultation being run by **Herefordshire Council**.

Cllr Richard Mayo said the county has legally got to find room for travellers but added:

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Public consultation launched on potential pitches for gypsies, travellers and travelling show people in Herefordshire



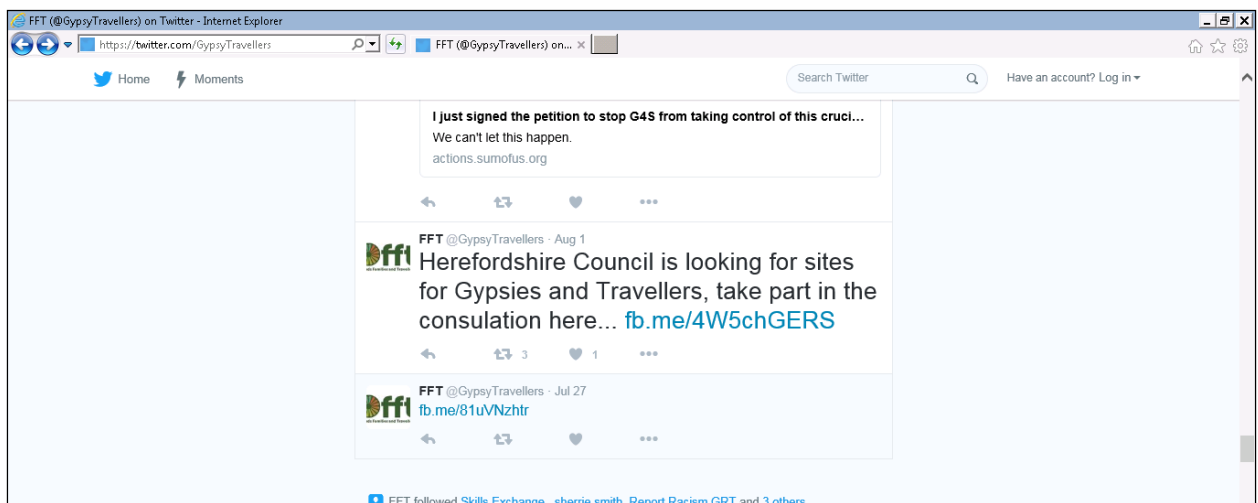
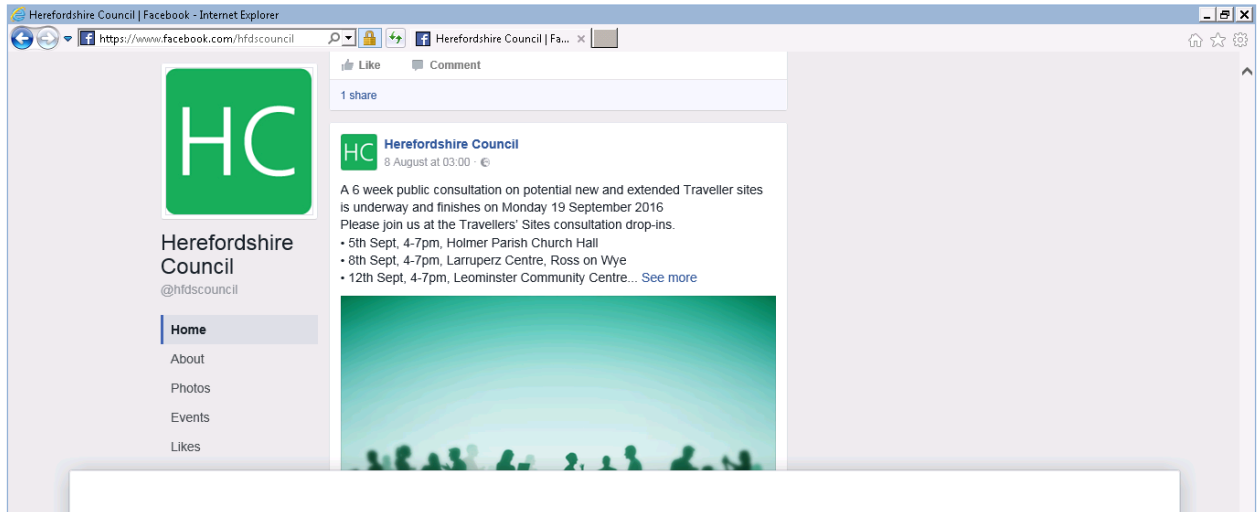
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It also featured on Herefordshire County Council social media regularly throughout the consultation, as well as 'Friends, Families and Travellers', Hereford Voice and Ross Gazette Facebook and Twitter pages.



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 Information about the travellers sites development plan document (DPD) consultation for the Local Plan
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[NEWS] Ross is being considered by Herefordshire Council for a new site for Travellers.



A potential Ross-on-Wye site for Travellers, Gypsies and Travelling Show People
 Ross-on-Wye is one of the areas being considered by Herefordshire County Council for a new site for Travellers.
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Appendix 5 – Summary of responses received on Traveller Sites Development Plan Document - Preferred Options consultation July 25th to 19th September 2016

Q.1 Do you agree with the number of pitches required for residential and temporary stopping places and the number required for Travelling Showpeople?

Yes 30

No 50

Not sure 33

- The majority of respondents answered 'no' that they did not agree with the figure.
- Of those who explained their reasons for answering 'no' in relation to overall provision, 11 believed the figure was too high and 4 considered the figure too low.
- There were concerns raised in relation to the number of sites proposed in the evidence base due to assumptions used to establish the need instead of interviewing Travellers.
- Empty pitches on existing sites indicates that the need for new pitches is not justified.
- Potential for turnover to be greater than assumed thereby increasing the supply of sites and consequently reducing the need for new pitches.
- The revised definition of travellers in the PPTS has not been taken into account in the GTAA.
- The GTAA is unreliable and conflicting.
- The rationale for turnover is unclear.
- Other frequently mentioned issues included; objection to taxpayers' money used to fund the sites as well as having to deal with the litter left and clean-up costs for the council.

Q.2. Do you agree that we need to find sites for 18 pitches arising from families living in houses, given the revised definition of Travellers in the Government Planning Guidance for Travellers?

Yes 28

No 60

Not sure 23

- The majority of respondents answered 'no' (60) that they did not agree with the need to find 18 pitches arising from families living in houses.

- Of those who explained their reasons for answering 'no' in relation to overall provision, 41 believed the figure was too high and 8 considered the figure too low.
- The evidence used to reach this figure was questioned by nine respondents as no interviews were carried out locally.
- Many respondents found it difficult to comprehend why Travellers living in dwelling houses would prefer a pitch as they believe that housing is a better option.
- The Council's focus should be on housing the homeless.
- The Council should have regard to the national definitions of travellers in the PPTS
- Other frequently mentioned issues included; objection to taxpayers money being used to fund pitches for Travellers living in houses as there are more significant budget pressures on the Council.
- Some also felt that Travellers were getting special treatment because of their lifestyle.

Q.3. Do you agree with the plan to provide stop over places with temporary facilities?

Yes 62

No 50

- The majority of respondents were in favour of temporary facilities provision. Those who answered 'yes' believed that it assists those who are passing through the area therefore preventing encampments in unauthorised locations such as council car parks and open space.
- Without the provision of a transit site or temporary stopping place the police have no legal power to remove travellers from unauthorised encampments other than via the S69 of the Criminal Justice and Public Order Act which is only invoked in aggravated trespass circumstances.
- Provision of a transit site/ temporary stopping places would enable the police to legally direct an authorised encampment to other preferred location. This will reduce community tension and financial burdens on landowners, policy monitoring, associated crime, loss of trade and clean-up costs.
- The majority who answered no were concerned about the management and policing of the temporary sites.
- Those who answered 'no' were also against such provision because of past experiences following encampments.

- Some respondents mentioned a lack of respect for settled people because of the attitudes of some Travellers and their treatment of sites and local people.
- Those against temporary provision believe that if Travellers choose this way of life then it should be their responsibility to pay for such sites as well as clean-up costs as Council budgets are very stretched with bigger priorities.
- The majority of respondents believe that Travellers do not pay any contribution towards temporary stop sites.
- May be an increased demand for temporary agricultural workers as a result of Brexit.

Q.4. Do you agree that the time spent on these sites should be limited to 14 days?

Yes 65

No 43

- The majority of respondents (65) were in favour of maximum stay of 14 days on temporary sites. 43 respondents did not agree with this limit and 34 provided no answer.
- Those who answered 'yes' highlighted issues with enforcing this maximum stay.
- There were some suggested circumstances where this may need to be lengthened because of bereavement or illness within the family using a transit site.
- Some of those who answered 'no' (43) explained that 14 days is not long enough. The time limit could be increased to allow take up of temporary work subject to good behaviour.
- Others felt that 14 days is too long to be considered a stopover. Some respondents were against this provision because it encourages this lifestyle too much which affects the children's potential. Some respondents felt that Travellers should utilise commercial sites for stopovers just like the settled community do.

Q.5. Can you suggest any other sites that are available and suitable for temporary stopping use?
(See also question 7)

Yes 13

No 87

- Although 13 respondents answered yes, there were only two general areas suggested:

- o Bringsty Common – no specific area identified
- o Council car parks

Q.6. Given the low number of required plots for Travelling Show people, do you think there is a need for extra plots to be identified in the Plan?

Yes 24

No 80

Not sure 2

- Commercial caravan/camping parks could be used by travellers at commercial rates
- Several areas should be identified to give local resident tax payers a choice, this way the decision is not forced on people.
- This should not be the duty of councils and local tax payers
- Travelling Show people are capable of finding their own sites and have existing adequate provision.
- Travellers should pay for their accommodation.
- Differentiate between Travellers and Travelling Show People.
- A number of suitable sites can effectively accommodate both travellers and travelling show people.
- If there is no additional demand over what is already provided, there is no need for extra plots.
- A need in the South West (of the County).
- Travelling show people usually stay on the site of the show. When the show has finished they move on. During the 'off' season people usually return to their point of origin.
- Travelling Show People find it very difficult to find suitable sites.
- Travelling Show people numbers are declining.
- No specific research has been done to suggest a need.
- Sites are dumping grounds causing rat infestation.
- The Show people sites in Ross should be checked to see if any land is available in that part of town.

- It is the Council's duty as this is a very hard land use to meet and it is very difficult for show people to find sites. If the need is low that is no reason to ignore. That is a self-perpetuating situation. There is a suppressed need for more pitches across the country and probably in Hereford and strongly suspect many have been forced to relocate to where there are pitches. Aware of huge problems in Gloucester/ Tewkesbury for show persons finding sites (e.g. Gotherington group). This should be addressed. Many live in overcrowded conditions and need the Council to help improve their situation rather than ignore it. Show Persons deserve better than this.

Q.7. Can you suggest any suitable sites which are likely to be available for this use (ie for Travelling Show People)? (See also question 5)

Yes 7

No 85

- Jays Green adj M50
- Old Council Yard (no further information given)

(Although 7 respondents said yes there were only two suggestions of sites)

Question 8 Site 1. Broadmeadow Yard, Ross-on-Wye. Do you agree that land adjacent to Broadmeadow Yard, Ross-on-Wye could be a suitable location for a temporary stopping place?

Yes 35

No 49

- Broadmeadow appears to be in an industrial estate and is therefore unsuitable for families
- Concern about proximity to nearby caravan park. May cause confusion and illegal encampments on the caravan site.
- Concern that will discourage tourists affecting town's economy.
- Inadequate size for the number of Travellers that come to Ross judging from recent experiences in 2016.
- Showpeople may own alternative sites that could be used
- Risk of litter in the culvert may cause flooding
- Not a suitable site if horses are involved.

- A temporary stopping place in the town centre is unsuitable for Travellers. A better site is located away from other uses in a more isolated location. Stopping place better along a primary road network or main route of travel.
- Consider nearby heritage assets

Question 9 - Site 2. A49 roundabout near Leominster. Do you agree that land adjacent to A49 roundabout near Leominster, could be a suitable location for a temporary stopping place?

Yes 50

No 31

Additional petition with 94 signatures against the site from local businesses

- A busy area, with lots of traffic. Not safe for children.
- Might be better as a site for storage of showground equipment
- Site subject to flooding
- Good location on the strategic highway network. Good access to a range of services and facilities. Travellers already use the general area.
- Concerned about the site becoming a permanent site instead of its intended temporary use.
- Will not be possible to address flood issues through SUDS and in winter conditions would be unacceptable for residents.
- Concerns over access in proximity to the A49.
- Large gas and water main under site with associated easement which would preclude development.
- Better alternative would be to consider use of laybys close to this site which would provide a better, safer environment for occupants and provide better value for money
- Noise and pollution issues so close to a main road
- Historic Lammas meadows nearby.
- Risk of contamination to River Lugg (SSSI)
- Gateway site into Leominster, not good for tourism
- Too close to the industrial estate which would deter businesses locating there

- The site proposal is not in accordance with paragraph 58 of the NPPF where safe environments preventing crime should be promoted. It is unlikely that the design of the proposed site could promote community safety and/or social cohesion.
- Concern over environmental impact on river and escalation of current theft/poaching issues
- Consider nearby heritage assets
- Good location on the strategic highway network. Good access to a range of services and facilities. Travellers already use the general area.
- Any traveller site is deemed the same as any residential development next to the operational railway should the Council choose to develop a site next to the operational railway they must provide a suitable trespass proof steel palisade fence of a minimum 1.8m in height to mitigate any risks that the development might import.
- Inadequate consultation.
- Sensitive green belt site in the wrong location and difficult to control increases in the number of caravans in the future.
- Concern over flood risk, increase in insurance premiums, property value decrease, management of site and personal safety
- The abuse and disrespect for the site is still an issue.

Question 10 - Do you have any suggestions of other sites for use as temporary stopping places?

Yes 6

No 83

- Jays Green Linton
- Suggest a purpose built site within the construction of the new relief road
- The old warehouse site past the cattle market by Labels roundabout
- Primary routes unsuitable due to traffic pollution. Risk of national and regional use at cost to Herefordshire residents.

Question 11 Site 3. Whitfield Coppice Trumpet. Do you agree that Whitfield Coppice Trumpet, could be a suitable site for a residential traveller site?

Yes 43

No 34

- Concern about the delivery of the site as it is not Council owned
- The proposal does not meet criteria 1, 2, 5, 6 of policy H4
- The site would dominate the residential properties around Trumpet crossroads.
- Remote from services and settlements.
- Current ground contamination.
- Previous application refused on highway safety grounds.
- Risk of significant negative impact on Special Wildlife Site and ancient semi natural woodland.
- Concern about local businesses being affected.
- No existing infrastructure for mains water, gas and sewerage.
- The need to maintain and enhance the rural and historic environment and biodiversity of the area is imperative.
- Not safe for children.
- Will put pressure on public services when the residents will not be paying taxes at same levels as residents.
- Local economy cannot support this provision.
- It has grazing land available for horses which is good for Travellers
- Not near other dwellings, good use of waste land.
- Not a brown field site, why should travellers be allowed open farmland?
- Should not mix Travellers with settled people
- The speed limit should be extended beyond the site entrance
- Consider nearby heritage assets

Question 12 - Site 4. Orchard Caravan Park at Watery Lane, Lower Bullingham. Do you agree that Orchard Caravan Park at Watery Lane, Lower Bullingham, could be a suitable option for two residential pitches?

Yes 52

No 24

- Extending an existing site seems a more cost effective solution
- Good local vehicle network.
- Already a local authority owned and managed site
- Two further plots would make it cramped and overcrowded with no local facilities with no room for any other community facilities like play area
- Pedestrian access to and within the site is dangerous
- Concern about how existing residents will accept more on the site.
- Question how provision of extra pitches would be funded.
- Acknowledge that the study has identified the opportunity for a joined up approach regarding the new access into the extension site and employment site and would emphasise the vital importance of this as to not compromise the future viability of, and ability to gain access to, the Enterprise Zone employment site to the south in any way.
- Need to ensure that the future viability of, and ability to gain access to, the Enterprise Zone employment site to the south is not compromised in any way.
- Consider nearby heritage assets
- There is no respect for site filth and debris left behind for the cost of local government

Question 13 Site 5. Land near Sutton St Nicholas. Do you agree that Land near Sutton St Nicholas, could be a suitable option for five residential pitches?

Yes 30

No 60

- The location of the site will encourage unsustainable car travel to the village and to access other facilities in Hereford.
- Unsafe routes to school along the Ridgeway and school lacks capacity for new pupils.
- The Rhea is affected by flooding from the river Lugg which would rule out access to the village from the southern part of the site. It is unlit and therefore would restrict use after dark.
- Significant harm to the character and appearance of the surrounding landscape with an urbanising impact.
- Contrary to national, county and local neighbourhood plan policies.
- Any planting screening could compromise the landscape character.

- Impact on local residents.
- The proposal cannot be justified as an 'exception' as this can only be applied to planning applications.
- Loss of greenfield land which is not an effective use of land.
- The site lies within a minerals safeguarding area
- An isolated site outside in the countryside not in line with policy
- Concern about utility provision and cost of site set up
- Conflicts with the recently submitted NDP
- Concern about accommodation of school places at the Sutton St Nicholas Primary
- Lack of a local medical facility
- No footpaths or nearby public transport encouraging car use. Proposed access is hazardous to all. Farm vehicles and HGV use.
- The lane is at risk of flooding annually leading to cut off. Possible water table issues/flooding impact on drainage issues.
- Threat of Legal action from our Insurance companies for the Tort of Nuisance if development takes place.
- The land is high quality agricultural land not suitable for residential development
- Inadequate local village facilities and services to justify locating a site nearby
- Significant impact on users of the public footpath.
- Risk of loss of the PROW
- Concern whether the council has acquired this land intending it for Traveller use without consultation
- Light pollution in this area would be unacceptable
- There is a badger set onsite.
- Consider nearby heritage assets
- The public right of way adjacent to the site will have to be closed. The danger to Sutton People and especially their children because dogs and rats etc. would make it unsafe.
- Site not required in order to meet the assessed need.

Question 14 Site 6. Extension to the Local Authority site at Pembridge. Do you agree that an extension to the Local Authority site at Pembridge could be suitable for more residential pitches?

Yes 54

No 30

- Extending a site that already exists would be more cost effective
- Extension to the site should be considered on the north east instead of along the road
- Travellers dislike the site because of its location and poor state. Extending it would not improve it but create further problems
- Unsafe for children
- Already a local authority owned and managed site. Extension to the south could share existing access. Site served by public bus service.
- The current plots are empty which leads to questions of need in the rural location
- There are no additional facilities for families and it is a dangerous place for children who tend to spend a lot of time outside.
- It would affect tourism
- Consider nearby heritage assets

Question 15 - Site 7 Openfields Caravan Site, Bromyard. Do you agree that two additional residential pitches on Openfields Caravan Site, Bromyard is a suitable option?

Yes 54

No 25

- Established sites would cost less and seem an obvious solution
- Local authority owned and managed sites .Efficient use of land.
- Minimal landscape impact as within existing boundaries of existing site. Good road access
- Site should have no more than 5 plots for better management of anti-social behaviour
- The site requires better management otherwise it should not be extended.
- The site has had 8 new pitches recently and needs time to bed in before expansion

- There continues to be significant issues with unlicensed vehicles, fly tipping, unlicensed waste transportation and obstruction of the estate road.
- Question how would improvements be funded
- Consider nearby heritage assets

Question 16 Site 8. Romany Way Caravan Site, Grafton. Do you agree that an additional pitch on Romany Way Caravan Site, Grafton is a suitable option?

Yes 58

No 20

- Romany close is extremely cramped. This site would work well as a transit site only
- Local authority owned and managed sites.
- Efficient use of land. Minimal landscape impact as within existing boundaries of existing site.
- Good road access.
- Away from major housing areas
- Concern about expansion and Traveller community cohesion
- Consider nearby heritage assets
- Question whether there should be two extra pitches on the existing site to minimise the risk of unauthorised settlements.

Question 17 Any suggestions of alternative or additional sites to help meet the need for pitches and plots in Herefordshire?

Yes 7

No 86

No suggestion of sites made despite 7 respondents answering 'yes'

Question 19 Do you agree with the approach to the longer term supply of sites?

Yes 37

No 49

- If Councils are paying upfront for these sites there should be charges for those using the sites.
- A further review of the evidence is needed in the future. Until that happens any long term consideration of site supply is a waste of time and can only lead to unnecessary effort and expense
- Not enough choice Not enough certainty
- Unresolved issues with sites put forward
- Cannot rely on windfall sites due to problems with local opposition
- Need greater certainty which will only be achieved through allocations
- Travellers should accept that living in a house is acceptable and no need for pitches
- Policy should discourage the Traveller lifestyle. Children need to be settled as they are at a disadvantage when travelling.
- Identify the sites now rather than having to do it again in a few years' time
- Some long term provision is required
- Sites could be designed into the Hereford Bypass route
- Revise GTAA report because of traveller definition
- Research is not Herefordshire specific and unproven demand.
- Information should be Herefordshire specific and existing sites need to be fully used before extensions are considered
- Restricting sites to the locations suggested in policy SS2 is too restrictive and will unreasonably prevent the delivery of acceptable sites elsewhere. Policy H4 already provides sufficient guidance on site location.

Question 20 - Do you agree with the issues identified for consideration in section 11.2?

Yes 45

No 33

- Unfair that taxpayers will be paying for this accommodation
- Discourage the Traveller lifestyle and there is no need for permanent sites

- The Core Strategy policy is adequate on design and paragraph 11.2 only repeats the PPTS requirements
- Careful design will help to minimise the impact
- Sites in the AONB should have specific reference to no adverse impacts in the AONB.
- H4 provides sufficient design guidance – no additional guidance is required.

Question 21 - Are there any other issues that should be included in the policy?

Yes 24

No 50

- Question the procedure for removal of sites that are not favoured by the local community.
- Question how monies will be recovered for illegal encampment and clean-up costs
- Brownfield sites only
- Compensation for businesses blighted by their presence
- Locations must have regard for the relevant Neighbourhood Plan
- Regular waste/bin collections to ensure the local community are not subjected to untidy and unhealthy waste.
- Travellers causing trouble should be expelled from sites. Ste out standards of behaviour on sites
- Council should review its land bank for potential sites
- Consider impacts on local services
- Lack of understanding amongst people about Traveller culture but Travellers must understand settled community
- Concern about having large numbers of travellers on a site as it causes problems
- With pressure on other service areas is it necessary to meet 100% of the need.
- The layout of sites and design of buildings is crucial in minimising impact on local surroundings. Sites should be developed using design criteria which could be spelt out in detailed guidance to assist in making planning applications.

Question 22 -Are there any other policies that should be included in the document?

Yes 16

No 57

- The availability of local services (e.g., education, doctors etc.) need to be considered.
- Consideration of the NDP
- Proper transit provision should be provided.
- Council should set out a financial policy on how it will fund development of Traveller sites.
More transparency on the Council's purchase of land to meet site need
- The Council needs a well-informed trained person to work within the Council who is able to liaise with the Travelling community.
- Should be a time limit on stopovers. Why permanent sites.
- Suggest policy guidelines are amended to ensure the historic environment is properly considered. Historic England suggest the first bullet point should read: 'Good quality of design to respect the setting of the site, including any potential impacts on designated and undesignated heritage assets'

Question 23 Do you have any comments on the Sustainability Appraisal (SA) and/or the Habitats Regulation Assessment (HRA)?

Yes 5

No 68

- Objectives 1,4 and 16 need revision to fully reflect the impacts highlighted
- The Sustainability Appraisal has most of the appraisals of the objectives set out as being able to have a score, because they cannot be measured without assumptions. If the council has no idea of what the provision is likely to be, how can it commit local public spending to this, comparing it to the known issues in other areas in public spending which are already an issue and are measurable
- Agricultural land change of use will have a negative impact.
- Note the SA report identifies that all 8 of the shortlisted sites will have some kind of impact on nearby heritage assets. All suggested sites will need detailed assessment as recommended.

Question 24 Do you have any other comments on the consultation document that are not covered by these questions?

Yes 24

No 63

- Make the information on the consultation more accessible
- Council funds are stretched enough without having to fund Traveller sites
- Consider areas along the Hereford relief road for potential sites
- Mistrust of Travellers due to previous negative experiences with theft and littering
- Should not have ruled out Mid-Summer Orchard Ridgehill without considering a different layout which could have addressed the visual impact
- Maps on the website are difficult to read
- Focus on enlarging existing sites and not creating new ones
- Concern about agricultural pollution or proximity of livestock on residents of traveller sites
- Having a large site would be easier to plan for rather than a number of smaller sites
- The Old Grafton Depot on the A49 South of Hereford Land adjacent to the M50 opposite Ross Golf Club
- The number of sites proposed is inadequate
- Possibly with a little ingenuity, planning and acquiring of modest amounts of adjoining land they could be made ideal for use as temporary, if not permanent sites
- Should consult specifically with Travellers
- Traveller sites are better situated close to the urban areas due to the proximity of facilities. Priority of services and costs to rate payers to be considered.
- The council's proposed site design policy is appropriate in seeking to protect privacy and residential amenity for neighbouring land uses.
- Support the Councils intended county wide plan led approach to identifying traveller sites, so that these sites can be appropriately assessed at a strategic level.
- It is concerning that the distribution of sites is predominantly in the south of the county

- Any new travellers' sites that may fall within the AONB, including the travellers' windfall sites, respect the status of this designated area. Any such applications within the AONB should be granted only if there are no adverse impacts on the landscape character and other special qualities of the AONB, including tranquillity. The proposals should be consulted with the AONB Unit and considered in accordance with the Malvern Hills AONB Management Plan 2014-19, Landscape Strategy and Guidelines, Guidance on Building Design and other associated guidance.
- No information given about the cost of site provision.
- Concern about the relationship between Traveller DPD and NDPs
- Proportional to housing for general occupation each traveller household takes up more space.
- There should be some recognition of competition for resources and indication of alternative strategies for meeting actual need e.g. use of emergency housing.
- There seems to be an imbalance in the distribution of sites and more may need to be provided in the south of the county.
- Need to ensure appropriate provision for disabled/older travellers.