

#29

COMPLETE

Answers Entered Manually

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Page 1

Q1 Personal Details

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Q2 If you do not wish to be on our database or receive any further information, please tick the box **Respondent skipped this question**

Page 2

Q3 Policy TS1 - Do you consider this part of the document is sound, based on the following issues?:

If you have not ticked any of the above, please give your reasons below with regard to the test of soundness.:
Achieving planning consent for Traveller sites is difficult enough anyway and a long list of requirements does not really help. It smacks of bullying. It also misses the key ingredient which is distinctiveness. It is this quality which makes the travelling community interesting to the artists and photographers etc. These details are best left to quiet discussions with Planning Officers so that applications can buy in to the process and the reasoning behind it.

Q4 Do you consider that your comment for Policy TS1 is a representation of: **Objection**

Q5 Please set out what change(s) you would consider necessary to make policy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(PS I think there is a misprint in paragraph 10 – SuDS drainage systems are generally for impermeable surfaces)

Q6 How do you wish your representation on this issue to be dealt with at the examination hearing?(Please note: The Inspector will determine the most appropriate procedure to adopt, to hear those who have indicated that they wish to participate at the hearing part of the examination.)

**Attending
the examination**

Page 3

Q7 Policy TS2 - Do you consider this part of the document to be sound, based on the following issues:

Respondent skipped this question

Q8 Do you consider that your comment for Policy TS2 is a representation of:

Respondent skipped this question

Q9 Please set out what change(s) you would consider necessary to make policy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Respondent skipped this question

Q10 How do you wish your representation on this issue to be dealt with at the examination hearing?(Please note: The Inspector will determine the most appropriate procedure to adopt, to hear those who have indicated that they wish to participate at the hearing part of the examination.)

Respondent skipped this question

Page 4

Q11 Policy TS3 - Do you consider this part of the document to be sound, based on the following issues:

Respondent skipped this question

Q12 Do you consider that your comment for Policy TS3 is a representation of:

Support

Q13 Please set out what change(s) you would consider necessary to make policy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Respondent skipped this question

Q14 How do you wish your representation on this issue to be dealt with at the examination hearing?(Please note: The Inspector will determine the most appropriate procedure to adopt, to hear those who have indicated that they wish to participate at the hearing part of the examination.)

Attending the examination

Page 5

Q15 Policy TS4 - Do you consider this part of the document to be sound, based on the following issues:

Respondent skipped this question

Q16 Do you consider your comment for Policy TS4 is representation of:

Support

Q17 Please set out what change(s) you would consider necessary to make policy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Respondent skipped this question

Q18 How do you wish your representation on this issue to be dealt with at the examination hearing?(Please note: The Inspector will determine the most appropriate procedure to adopt, to hear those who have indicated that they wish to participate at the hearing part of the examination.)

Attend the examination

Page 6

Q19 Policy TS5 - Do you consider this part of the document to be sound, based on the following issues:

Respondent skipped this question

Q20 Do you consider your comment for Policy TS5 to be a representation of:

Support

Q21 Please set out what change(s) you would consider necessary to make policy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Respondent skipped this question

Q22 How do you wish your representation on this issue to be dealt with at the examination hearing?(Please note: The Inspector will determine the most appropriate procedure to adopt, to hear those who have indicated that they wish to participate at the hearing part of the examination.)

Attend the examination

Page 7

Q23 Policy TS6 - Do you consider this part of the document to be sound, based on the following issues:

If you have not ticked any of the above, please give your reasons with regard to tests of soundness.:
support with reservations – an isolated site – difficult to manage at the present size – additional management capacity may be required.

Q24 Do you consider your comment for Policy TS6 to be a representation of:

Support

Q25 Please set out what change(s) you would consider necessary to make policy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Respondent skipped this question

Q26 How do you wish your representation on this issue to be dealt with at the examination hearing?(Please note: The Inspector will determine the most appropriate procedure to adopt, to hear those who have indicated that they wish to participate at the hearing part of the examination.)

Attend the examination

Page 8

Q27 Policy TS7 - Do you consider this part of the document to be sound, based on the following issues:

If you have not ticked any of the above, please give your reasons with regard to tests of soundness.:
This will give the police additional powers under the CJPOA to direct Travellers to the site. If the Plan had included a similar site in Ross it would have been supported . It is not reasonable for Travellers working in the Ross area to have to travel from Leominster – a site in the south of the County as well as one in the north would have been an acceptable compromise.

Q28 Do you consider your comment for Policy TS7 to be a representation of:

Objection

Q29 Please set out what change(s) you would consider necessary to make policy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Respondent skipped this question

Q30 How do you wish your representation on this issue to be dealt with at the examination hearing?(Please note: The Inspector will determine the most appropriate procedure to adopt, to hear those who have indicated that they wish to participate at the hearing part of the examination.)

Attend the examination

Q31 GTAA - Do you consider this document to be sound, based on the following issues:

If you have not ticked any of the above, please give your reasons with regard to tests of soundness.:

Looking at the current DPD and the GTAA that supports it, it is disappointing that the latter seems to start from the presumption that figures of the need for additional pitches should be forced down as far as possible. In the first place it gives the impression that providing for this community is an unpleasant obligation which every device should be used to minimise. This seems likely to encourage the existing levels of prejudice and intolerance towards Travellers in the wider community. In my opinion the opposite is true; sites are a useful way of addressing the needs of an unusual and valuable minority in a period when the traditional lifestyle is being assaulted from numerous directions: i/ Pressure from draconian legislation in the Criminal Justice and Public Order Act, ii/ the physical removal of 'stopping places' through dumping, ditching etc. iii/loss of seasonal work etc. has created a situation where the Travelling life has almost lost its rationale. Sites therefore, are a way of addressing some of the Community's distinctive needs (living in caravans, living with family groups, being able to move away when necessary etc.) while providing a degree of stability for access to education, health, work etc. They also help to reduce the perceived scourge of illegal encampment, while incidentally freeing up houses for those who need and want them. The difficulties with the management of sites in the past, is not entirely surprising given the huge transition in way of life that they represent. The signs currently are that sites are settling down, and residents becoming more positive. Clearly though, we do need more of them. So the main criticism of the current GTAA is the use of the phenomenon of Turnover to suggest there is no current need for additional pitches in the area – the need assessed as 6 additional pitches a year will be met by Turnover (people quitting sites and moving on.) However with 40 families apparently on the current waiting list for pitches, this proposition seems far fetched indeed. The use of turnover

has been widely criticised; if people are leaving sites where are they going to? – they are not disappearing into thin air – does someone moving necessarily create a net vacancy?, what about people entering the County etc? The technique was examined carefully by a panel of Planning Inspectors in the Unfinished Partial South East Review with a recommendation that it should not be used. With all this uncertainty it is a pity that, when the 6 families who left Herefordshire sites in the last two years were known, no one seems to have looked at the reasons for them leaving, where they went to, are they coming back? etc. This sort of detail might have given us a much clearer understanding of the factors involved. Turnover carries with it the idea that a vacancy on one site is suitable for anyone who needs it. In reality the careful choice of residents is a crucial part of good site management. There are serious tensions within the Travelling community which good site management is sensitive to. In the past there have been examples in this area where insensitive allocation of pitches has led to whole sites being vacated and left virtually empty. Furthermore there is an equality issue – as one Council Officer has put it, 'It should be recognised, in the same way that the 'choice based lettings' mechanism for allocating affordable housing has been adopted, G + T families can't be expected to occupy vacant pitches if they are not in a location where they want to live, for example, close to family or support networks, and there should be some element of 'choice' in where they choose to settle.' While pitches should be occupied, there still needs to be some elasticity in the system. The idea that Turnover of 6 pitches a year (based on only 2 years evidence and with no further detail) can address continuing assessed need is fanciful. The other aspect that seem to be missing is a proper assessment of the needs of housed Travellers of which Herefordshire (as recognised in the 2007 GTAA) has a high proportion. Many were written to for the 2015 GTAA and at least 9 signed consent forms to be interviewed but it seems none were. Instead an allowance of 14 additional pitches was added to the need column in 2015. In the 2017 update, on the basis of information from the Register of applications for pitches a figure of 20 was added . However as none were interviewed , we can have little understanding of whether these were new families, suppressed households or what. The figure for Applicants for pitches is now said to stand at over 40, which is sufficiently startling to warrant investigation. The need calculations may already be out of date.

Q32 Do you consider your comment about GTAA to be a representation of: **Objection**

Q33 Please set out what change(s) you would consider necessary to make the document legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording. Please be as precise as possible.

Respondent skipped this question

Q34 How do you wish your representation on this issue to be dealt with at the examination hearing?(Please note: The Inspector will determine the most appropriate procedure to adopt, to hear those who have indicated that they wish to participate at the hearing part of the examination.)

Attend the examination

Q35 Are there any other comments you wish to make with regard to the Travellers' Sites document?

It is a pity that in its DPD the Council has not been a bit bolder. The government document Circular 1/2006 asked Councils to 'make land available' for Traveller sites. Unfortunately this never happened. However individuals have been able to acquire land and such private sites have been the only way that the number of authorised pitches in the area has increased in recent years. Generally speaking they have been very successful and the overwhelming majority are pleasant well-kept places. They are popular, sustainable and the costs of development are not borne by the tax payer. Undoubtedly they are the preferred choice of many Travellers. The problem is finding affordable land. The land that was put forward in the preferred options paper, at Sutton St. Nicholas, already had planning permission (though lapsed) and had been accepted by the government as suitable for 100% grant funding. It would have been/could still be suitable for small private sites and with that background would have had a fair chance of getting planning permission. I realise that there was local opposition but that, sadly, will mostly be the case.

It has been argued that the Herefordshire DPD is not sound. It has not been positively prepared because the concept of Turnover of pitches is a crude mathematical way to force down the figure for those needing site accommodation, and is only hazily related to the reality on the ground. If and when the new pitches are provided the number will still be well below what was assessed as being needed for the County in the 1980's

It is not justified because there are draconian powers to prevent or penalise roadside camping – which was the traditional lifestyle of a distinctive minority and there needs to be some elasticity in the system to allow the community to adjust to this change.

It is not effective as it is not deliverable. The cost of the extensions to the existing sites will be in the range of £70,000-£80,000 per pitch of which with luck the government may pay half.. The DPD was approved before the costings were calculated and before site work was undertaken. In a time of severe challenges to Council spending priorities, it is most unlikely that there would be a budget for this. The existing sites were all 100% government funded and even the refurbishment of Grafton was, I understand, 75% government money. If the Homes England application fails there is even less likelihood that the pitches will be developed. The Council should have explored further cheaper options like supported private provision.

It is not consistent with government policy. The government says its' overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional nomadic way of life of travellers while respecting the interests of the settled community', and to ensure Local Authorities ...develop fair and effective strategies to meet need through its identification of land for sites'

It does not facilitate the traditional nomadic way of life because families will not be able to leave their pitches because they may not be able to find an alternative because the need is not being adequately addressed.