

#26

COMPLETE

Answers Entered Manually

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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**

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

Q4 Do you consider that your comment for Policy TS1 is a representation of: **Respondent skipped this question**

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. **Respondent skipped this question**

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.) **Respondent skipped this question**

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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

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Q11 Policy TS3 - 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.:
With regard to the site adjacent to the roundabout on the A49 in Leominster our Flood Map for Planning does show that the site partially falls within Flood Zone 3, the high risk Zone. The modelling technique used to inform the Flood Map at this location is Jflow (generalised modelling). However, as stated in Paragraph 6.3 of the submitted plan, detailed modelling of the Arrow and Lugg confirms that the site lies within Flood Zone 1, the low risk Zone. Whilst the recent modelling needs to be refined before it is included within the Flood Map it provides the confidence that the site can be utilised as a temporary stopping places for up to five pitches.

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

Respondent skipped this question

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.)

Respondent skipped this question

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Q15 Policy TS4 - 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.:
See final comment re site flood zones

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

Respondent skipped this question

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.)

Respondent skipped this question

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Q19 Policy TS5 - 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.:
See final comment re site flood zones

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

Respondent skipped this question

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.)

Respondent skipped this question

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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.:
See final comment re site flood zones

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

Respondent skipped this question

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.)

Respondent skipped this question

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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.:
See final comment re site flood zones

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

Respondent skipped this question

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.) **Respondent skipped this question**

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

Q32 Do you consider your comment about GTAA to be a representation of: **Respondent skipped this question**

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.) **Respondent skipped this question**

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

Flood Risk: When considering the allocation of sites, in the first instance reference should be made to our Flood Map for Planning (Rivers and Sea) which provides an indication of fluvial flood risk. In line with National Planning Policy and, specifically, the Sequential Test (see paragraphs 100 – 104 of the National Planning Policy Framework (NPPF)), we would expect all built development to be located within Flood Zone 1, the low risk Zone, in the first instance.

Matters relating to flood risk are of particular importance for gypsy and travellers sites, permanent or transit, as flooding can present problems and greater risk for developments such as caravans and mobile homes. The National Planning Practice Guidance (NPPG) sets out the vulnerability of different uses (paragraph 066 reference ID: 7-066-20140306 of the flood risk section) and non-permanent caravans etc. are considered 'More Vulnerable', as opposed to 'Highly Vulnerable' (Caravans, mobile homes and park homes intended for permanent residential use').

Planning Policy for Traveller Sites: The recently produced DCLG policy on traveller sites (August 2015) seems to offer greater clarity on the above and, in Policy B - Part g, states that Local Planning Authorities should ensure that their policies 'do not locate sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans'. In the absence of definite steer in the NPPG this Policy would indicate that, when considering sites for allocation within your DPD, sites within Flood Zone 3 should be discounted. Sites within Flood Zone 2 may be considered (subject to suitable warning and evacuation measures), using the Sequential Approach, if it has been demonstrated that there

are no suitable sites available at a lower risk of flooding i.e. Flood Zone 1.

Strategic Flood Risk Assessment (SFRA): As stated above a robust evidence base is required to inform local plans and make planning decisions, in this instance the allocation and assessment of gypsy and traveller sites. As part of the recently adopted Herefordshire Council Core Strategy updates were made to the Strategic Flood Risk Assessment (SFRA). The updated evidence base did not extend to Rural Parishes and other DPD allocations such as the Gypsy and Traveller document but rather focused on major housing allocations in Hereford City and the market towns. It is therefore important that your plan offers robust confirmation that development is not impacted by flooding or increases flooding to third parties. It is understood that your Council are intending to undertake a SFRA update, and have requested flood model data from the Environment Agency, and you should consider how this update can be fed into the assessment of your DPD site allocations.

Notwithstanding the above we have previously provided comments on site allocations to be considered within the DPD. This has informed the current submission, screening out a number of sites impacted by fluvial flooding, with all five remaining sites located within Flood Zone 1, the low risk Zone.
