

#30

COMPLETE

Answers Entered Manually

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Page 1

Q1 Personal Details

Name: **Mrs E A O'Sullivan**
Address: **PRuB**
Postcode:

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?: **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**

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:

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

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:

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

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:

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

Page 7

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

Respondent skipped this question

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

Page 8

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

Respondent skipped this question

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?

Travellers' Sites DPD Pre-Submission Draft Consultation

Thank you for consulting PRuB on this paper. Overall we believe the policies have come a long way and together mostly reflect a usable document. However, there are some issues that need attention and your Survey Monkey proforma for comment does not provide scope for this so we make our points as follows:- In General We are pleased that the emphasis has now been placed on traveller sites being associated with the larger settlements in recognition of their large scale impact on the smaller settlements of the county. There are a number of typos and mis phrasing in the report that need correction and these should be addressed before submission. We leave it to the drafters to pick up in their review.

Paragraph 2.6 1.makes reference to 'reasonable access' seemingly dropping the principle of sustainability. As sustainability is well defined in planning guidance it would be sensible to stick with that term rather than use the term 'reasonable' which is open to challenge given the scope for different interpretations. 3. The phrasing of – 'peaceful and integrated co-existence between sites and the local community' should better refer to 'the sites' occupants and the local community'. 7. The meaning of 'such sites can be retained for that purpose in perpetuity' is unclear. Does this mean that access to services can be maintained in perpetuity – ie the site will remain sustainable forever? If the phrasing is obscure then it gives scope for different interpretations and therefore challenge at Appeal. Further clarification is needed. Also there seems to be a degree of tautology between the phrasing in 2.7

'The accommodation assessment does not identify a specific need for affordable provision but Policy RA3 of the Core Strategy sets out the circumstances when residential development will, in principle, be acceptable outside the County's settlements. This includes Gypsy and Traveller sites where proposals for sites meet the criteria of Policy H4' and under the following RA3 at 7. ' is a site providing for needs of gypsies or other travellers in accordance with Policy H4.'

If all this is taken in the round with the points made above it appears that such tautology indicates that travellers sites in open countryside are permitted because they provide accommodation for travellers - clearly a self fulfilling arrangement that seems to override other considerations. It is essential that this be changed as it appears to give the green light for traveller sites anywhere in the open countryside subject only to reasonable access to services in perpetuity. This is particularly worrying when considered in conjunction with paragraph 4.13 which acknowledges that as an exception there may be demand for private sites for personal use outside the Local Authority provision to meet need.

Paragraph 2.9 is not clear. Does this mean that only one site will be provided? On the assumption that this is the case, the final sentence of this paragraph would better read:-

'This objective is fully met by the adoption of the site on the A49 roundabout in Leominster as the sole transit site/temporary stopping place in Herefordshire as proposed in section 6.0'.

Paragraph 3.3 in the published comment on the last consultation paper, in question 10 on 'other sites suggested' there is reference to a suggested transit site at Jays Green Linton. This is not suitable for a transit site as it is already in permanent occupation by travellers who own and run the site. It is too close to the M50 to be only a county transit site and would become a regional transit site facility for stopover on long distance travelling. The M50 Junction3 exit/entrance is unsuitable for increased regular use by large vehicles and caravans accessing the nearby entrance to the Jays Green site.

For the sake of clarity we suggest the sentence in this paragraph beginning 'It identified 8 sites.... should read:-

It identified 8 sites for consideration for traveller accommodation but only those sites listed in section 6.0 of this document have been assessed as suitable by HC'.

Paragraph 4.7 What is the PPTS? Is it the Government's Planning Policy for Traveller Sites? If so this should be spelt out and the definition should be repeated here.

Paragraph 4.12 There is something wrong with the drafting. Does 'Therefore the five requirement is between 5 and 6 pitches.' mean five year requirement?

Paragraph 5.1 suggests there are several 'Core Strategies' – this is presumably a typo and should read:- 'strategy's'.

The list of mitigating factors suggests that locations which adversely impact nature conservation and landscape are acceptable. This does not seem right as such sites should be regarded as unsuitable. This section needs redrafting to better reflect the conservation policies in the Core Strategy.

We suggest replacing the word 'mitigate' with 'avoid' so the sentence would read :-

'This policy seeks to ensure the delivery of high quality sites that will contribute to a good quality of life for the residents and avoid any potential negative impacts of the development of new pitches'

Paragraph 5.2 is unintelligible – something has gone wrong with the drafting.

Please keep us informed of developments so that we can track progress and monitor any further changes before a final document is agreed as part of the adopted Plan.