

# Herefordshire Travellers' Sites DPD

## Comments in plan order

Paragraph	Policy	Id	Representation
General comment		1007	2045

Name

Organisation:

RepresentationType:

isPositivelyPrepared  isJustified  isEffective  isConsistentNP  isLegallyCompliant

SoundnessReasons

I can confirm that the City Council does not wish to make any comments at this stage.

ChangesNecessary

Paragraph	Policy	Id	Representation
<b>General comment</b>		<b>1004</b>	<b>2026</b>

Name  E A O'Sullivan

Organisation:  PRuB

RepresentationType:

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

#### SoundnessReasons

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

ChangesNecessary

Paragraph	Policy	Id	Representation
<b>General Comment</b>		<b>1018</b>	<b>2078</b>

Name  D Thompson

Organisation:  Hereford Enterprize Zone

RepresentationType:

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

#### SoundnessReasons

We have provided general comments on Policy TS5, Orchard Caravan Park on Watery Lane from a development and operational standpoint with the extension site being within the Enterprise Zone boundary. These comments are made from purely a Hereford Enterprise Zone perspective. We have declined to provide comments on the soundness of this policy or the other policies referenced in this consultation.

ChangesNecessary

Paragraph	Policy	Id	Representation
<b>General comment</b>		<b>1019</b>	<b>2079</b>

Name

Organisation:

RepresentationType:

[isPositivelyPrepared](#) [isJustified](#) [isEffective](#) [isConsistentNP](#) [isLegallyCompliant](#)

#### SoundnessReasons

The Parish Council is against any further development of traveller sites in the Bosbury and Coddington Parishes - both Council and privately owned – existing or new – as the area has more than its fair share already

[ChangesNecessary](#)

Paragraph	Policy	Id	Representation
<b>General Comment</b>		<b>1003</b>	<b>2025</b>

Name

Organisation:

RepresentationType:

[isPositivelyPrepared](#) [isJustified](#) [isEffective](#) [isConsistentNP](#) [isLegallyCompliant](#)

#### SoundnessReasons

We note that none of the proposed sites for permanent or temporary pitches are in close proximity to the administrative boundary of Malvern Hills District. The SWC have no in principle objections to the proposed sites. Obviously, if new potential sites for either permanent or transit pitches are proposed in the process of preparing the Travellers' Sites DPD then we would wish to have an opportunity to make representations. We acknowledge and appreciate that Herefordshire Council has engaged constructively with the SWC as part of the Council's Duty to Cooperate. Further, the SWC are committed to further discussions as both Site Allocations DPDs progress in order to comply with on-going requirements associated with the Duty to Co-operate and as part of the Memorandum of Understanding arrangements between Malvern Hills District Council and Herefordshire Council.

[ChangesNecessary](#)

Paragraph	Policy	Id	Representation
<b>General comment</b>		<b>1002</b>	<b>2016</b>

Name  Steve Davis

Organisation:

RepresentationType:  Support

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

#### SoundnessReasons

I am generally happy with the proposed plan and pleased to see that several of the points raised in the consultation have been addressed.

ChangesNecessary

Paragraph	Policy	Id	Representation
<b>General comment</b>		<b>1012</b>	<b>2059</b>

Name  J  Farrar

Organisation:  Leominster Civic Society

RepresentationType:

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

#### SoundnessReasons

Thank you for your invitation to comment on the Travellers Sites Development Plan. However, we must state that this sort of consultation is close to utterly useless for people who are not conversant with the minutiae of the subject. There are four technical documents, often cross-referencing other documents. To expect lay people to wade through all of this is unrealistic. The whole exercise seems to be designed to ensure ordinary people do not interfere with the machinations of Herefordshire Council.

ChangesNecessary

Paragraph	Policy	Id	Representation
<b>General comment</b>		<b>1011</b>	<b>2057</b>

Name

Organisation:

RepresentationType:

isPositivelyPrepared  isJustified  isEffective  isConsistentNP  isLegallyCompliant

#### SoundnessReasons

Ledbury Town Council supports the pre-submission draft and considers it to be an excellent document.

ChangesNecessary

Paragraph	Policy	Id	Representation
<b>General comment</b>		<b>1009</b>	<b>2055</b>

Name

Organisation:

RepresentationType:

isPositivelyPrepared  isJustified  isEffective  isConsistentNP  isLegallyCompliant

#### SoundnessReasons

Are there any other monitoring objectives included except the one cited in paragraph 7.1? Using only this indicator, it will not be possible to assess if all the policies/ clauses of the policies have been effective.

We will be happy to advise further on the comments we have made above and how the Plan can progress, once we have received the additional information we have requested.

ChangesNecessary

Paragraph	Policy	Id	Representation
<b>General comment</b>		<b>1022</b>	<b>2089</b>

Name  Giles Boardman

Organisation:

RepresentationType:

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

#### SoundnessReasons

All these positive changes to increase the number of sites will obviously cost. Could the cost of the toilet/ utility room building be reduced buy buying a standard off the shelf building. This could be constructed in a factory and placed on to a prepared site and connected. This reduction in unit costs would mean more sites could be opened per year.

#### ChangesNecessary

Paragraph	Policy	Id	Representation
General comment		1014	2064

Name

Organisation:

RepresentationType:

isPositivelyPrepared  isJustified  isEffective  isConsistentNP  isLegallyCompliant

#### SoundnessReasons

I also attended the information evening held at Leominster Library on 23rd November 2017. I believe that the local people of Leominster were not given an opportunity to attend as all the details of this meeting held within the Library, were not on public display. Library staff had little knowledge of a meeting taking place. To my knowledge flyers were not attached to main parish notice boards informing people of the consultation. Surely this cannot account as a public consultation when the public have no knowledge of what is happening in their own town.

The two Planning Officers in attendance could not give any details of the site location, other than pointing to a plan within the Consultation Document. They were unaware of the two residential properties and a Nursing Home in close proximity to this proposed site. I was extremely disappointed that these senior officers had not done their homework on the area in question. Previous to this meeting, I had invited the Senior Planning Officer to the site, to no avail.

I do not believe that there has been effective joint working with the local community and businesses in delivering this plan.

This area of Leominster, known as Leominster Out parish doesn't form part of a local or town parish so therefore local councillors are not concerned in representing local parishioners living and working in the area. Many Leominster businesses are in shock that they have not been informed of current developments. All hoping that Herefordshire Council would use common sense and logic against Government policy in sustaining business and trade in Leominster. It will be too late for all of us when this policy is reviewed in five years time.

#### ChangesNecessary

Paragraph	Policy	Id	Representation
General comment		1008	2047

Name

Organisation:

RepresentationType:

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

### SoundnessReasons

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.

ChangesNecessary

Paragraph	Policy	Id	Representation
<b>General comment</b>		<b>1013</b>	<b>2060</b>

Name

Organisation:

RepresentationType:

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

#### SoundnessReasons

The Coal Authority records indicate that there is coal mining legacy within the Herefordshire area which includes 29 mine entries and likely unrecorded coal workings at shallow depth. I have reviewed the document and the sites proposed for allocation and can confirm that there are no recorded shallow coal mining features on any of the sites identified. We therefore have no specific comments to make.

ChangesNecessary

Paragraph	Policy	Id	Representation
General comment		1005	2042

Name

Organisation:

RepresentationType:

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

No No No No

#### SoundnessReasons

1/ My name is Peter Baines. I have been involved with the issue of Gypsy and Traveller sites in Herefordshire since January 1977. I have campaigned consistently with others for the Local Authority to build sites and recently I have assisted local Travellers to make planning applications and contest appeals. I am aware of most of the sites in the Herefordshire GTAA(2017) list in paragraph 4.5. ch 82 had been built at the time of the separation of the Counties in 1998, a 10 pitch site was in the pipe line (with 100% government grant agreed) and there had been some initial work towards another 10 pitch site.

#### Background

2/ In the days of Hereford and Worcester Council (1988, a Judicial Review application was brought in which the Council was found to be in breach of its duty under the Caravan Sites Act 1968 by not having produced sites in its area. From this point onwards things improved greatly; accommodation needs were assessed and with 100% government grant, a sites programme was inaugurated. The target number of residential pitches for the County was 230 residential pitches with 102 in Herefordshire. At the inception of Herefordshire Council 82 pitches had been built..

3/ Unfortunately in the early days negative attitudes persisted , a 10 pitch site with planning permission and 100% government grant agreed, was abandoned and the 16 pitch emergency site at Madley was closed. Further challenges arose to the management of sites which the Council's approach was unequal to with the result that pitches were damaged and whole sites closed. The number of official pitches in the County from the 82 inherited, to (at one time) only 36 pitches. The situation has recovered slowly to the 53 pitches we have at present (but still not much more than half the need assessed in the 1980's).

4/This is the backdrop to the present DPD proposals. Living on sites had become unpopular and many families opted for social housing as a more stable option. However sites are clearly a preferred choice for many in line with the European Court's finding that Caravan living is an essential part of the community's ethnic identity. It is a tribute to the current Council management, that sites are again full and with long waiting lists for pitches (now believed to be over 40 families).

5/ So the current proposal for an additional 9 pitches is to be welcomed as any increase is good news, and another step towards the number of pitches inherited from the predecessor authority.

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 born 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 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.

[ChangesNecessary](#)

Paragraph	Policy	Id	Representation
General Comment		1014	2155

Name

Organisation:

RepresentationType:

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

#### SoundnessReasons

Positively prepared – The plan with reference to PolicyH4-Traveller sites in promoting peaceful and integrated co-existence between the site and the local community has not been thought through. I have owned the ground adjacent to this site since 2000 and keep animals there as part of my farming business. During this time I have been a guardian of this proposed site, in making the entrance secure with a chain and lock to prevent unauthorised encampment. The local town council hold the keys and the local police have knowledge of this.

I have had to deal with the Travelling Community when they choose to demonstrate antisocial behaviour in fly-tipping, dumping personnel waste and fly-grazing with horses. In fact the evidence is clear to see at this time of year when the leaves are off the trees. Wooden fencing has been sawn off at ground level at the entrance of the cycle path so the Travellers could drive a 4x4 vehicle along the path. This is not acceptable when employees and family visiting loved ones use this route to walk to West Eaton Nursing Home. Also there seems little regard given to the families living in the houses at Midsummer.

All these incidents have been raised and recorded with the local police, environmental health and the RSPCA.

The levels of rural crime against businesses has risen within the area. The NFU continue to lobby the local police and crime commissioners to give rural crime a higher priority leading to enforcement. Leominster has always depended on a thriving farming community.

Furthermore the proposed site is the result of surplus ground from a compulsory purchase agreement when the A49 was constructed. The road was completed in 1988 and Herefordshire Council have chosen not to maintain, let or sell the ground for a period of twenty seven years. Thus resulting in lost revenue.

#### ChangesNecessary

Paragraph	Policy	Id	Representation
General Comment		1024	2103

Name

Organisation:

RepresentationType:

isPositivelyPrepared  isJustified  isEffective  isConsistentNP  isLegallyCompliant

#### SoundnessReasons

With regard to this consultation exercise I personally had been unaware of the the previous public consultations referred to, as I suspect have many others who may have a particular interest in Gypsy and Traveller issues. It is possible that these groups or individuals do not readily access the forms of media communication that the authorities use, I came across this consultation only through a random visit to the Herefordshire Council website, something I rarely do because I find little there which is either involving or of particular interest to me.

ChangesNecessary

Paragraph	Policy	Id	Representation
General Comment		1026	2115

Name

Organisation:

RepresentationType:

isPositivelyPrepared  isJustified  isEffective  isConsistentNP  isLegallyCompliant

#### SoundnessReasons

We have a growing population of Gypsies and Travellers in Herefordshire. It is important, from the perspective of the health and wellbeing of children and families, to encourage the development of sufficient culturally/practically suitable accommodation to meet demand. Transit provision is absolutely necessary to alleviate the community tensions caused by unauthorised encampments and to ensure decent temporary accommodation for vulnerable children and adults.

ChangesNecessary

Paragraph	Policy	Id	Representation
General Comment		1030	2121

Name  Zena Greene

Organisation:

RepresentationType:

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

#### SoundnessReasons

I have lived in Ross-On-Wye most of my life and know the town well , with this in mind  
(COMMENT REDACTED)

I worry a great deal that a town site would bring trouble. However not  
tarring everyone with the same brush is also important.

A site that would cause little distress as possible to homeowners is the only solution. Therefore a site  
near the cattle market, down near baileys diy . The owner of Labels will have to serve Ross like the rest  
of us and accept that down there is the best place for a discreet site that's out of the way but close to  
town.

There could also be a site behind tudorville or out between the Vine tree pub and Walford. Any closer  
to town than these sites and you risk ruining it.

Look to Monmouth for ideas , they seem to have got it right and have a thriving high street and pretty  
town .

#### ChangesNecessary

Paragraph	Policy	Id	Representation
<b>General Comment</b>		<b>1031</b>	<b>2122</b>

Name  Paul Harris

Organisation:

RepresentationType:

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

#### SoundnessReasons

Just one question. I have worked hard all my life. I HAVE PAID TAX, All my life. I am even paying tax on my pension for which I already paid tax for every week I working. Will the travellers pay towards the sites. Or will my pension tax be used to pay for them? We live near a site that was built for said travellers. The site had to be closed because it was not used for its purpose. Is this another waste of money project.

ChangesNecessary

Paragraph	Policy	Id	Representation
<b>General comment</b>		<b>1032</b>	<b>2123</b>

Name  Hannah Lorna Bevins

Organisation:  Amec Foster Wheeler on behalf of National Grid

RepresentationType:

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

#### SoundnessReasons

We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.

ChangesNecessary

Paragraph	Policy	Id	Representation
<b>General Comment</b>		<b>1028</b>	<b>2118</b>

Name  Ian Goddard

Organisation:  Aymestrey Parish Council

RepresentationType:  Objection

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

No

SoundnessReasons

Concern re positive preparation.

I do not know why the site between Mortimer's Cross and Shobdon has been omitted from the list of sites.

ChangesNecessary

I only wish to bring to attention that the site at Mortimer's Cross has been omitted

Paragraph	Policy	Id	Representation
<b>General comment</b>		<b>1033</b>	<b>2124</b>

Name  Emma Smith

Organisation:  CQC

RepresentationType:

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

SoundnessReasons

As the independent regulator of Health and Social Care in England, we would be unable to express any opinions regarding the consultation outlined below.

ChangesNecessary



Paragraph	Policy	Id	Representation
<b>General Comment</b>		<b>1029</b>	<b>2120</b>

Name  Anne Adams

Organisation:

RepresentationType:

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

SoundnessReasons

I was unable to come to the Library on Thursday, but the plan seemed much the same. I do not know anything about the sites outside Leominster.

ChangesNecessary

Paragraph	Policy	Id	Representation
<b>2.6</b>		<b>1004</b>	<b>2027</b>

Name  E A O'Sullivan

Organisation:  PRuB

RepresentationType:

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

SoundnessReasons

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.

ChangesNecessary

Paragraph	Policy	Id	Representation
2.7		1004	2028

Name  E A O'Sullivan

Organisation: PRuB

RepresentationType:

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

#### SoundnessReasons

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.

#### ChangesNecessary

Paragraph	Policy	Id	Representation
<b>2.9</b>		<b>1004</b>	<b>2029</b>

Name  E A O'Sullivan

Organisation:  PRuB

RepresentationType:

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

#### SoundnessReasons

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'.

ChangesNecessary

Paragraph	Policy	Id	Representation
<b>2.11</b>		<b>1052</b>	<b>2153</b>

Name  A  Jones

Organisation:  Shropshire County Council

RepresentationType:

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

#### SoundnessReasons

We welcome and agree with the statement in paragraph 2.11 of the document that Herefordshire is meeting its own needs and has not been asked to assist in meeting Shropshire need, this being informed by discussions to consider mutual issues & joint opportunities. The recently published Shropshire GTAA evidences that the main in migration to Shropshire comes broadly from the West Midlands region of which Herefordshire is part.

ChangesNecessary

Paragraph	Policy	Id	Representation
<b>3.3</b>		<b>1004</b>	<b>2030</b>

Name  E A O'Sullivan

Organisation:  PRuB

RepresentationType:

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

#### SoundnessReasons

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'.

#### ChangesNecessary

Paragraph	Policy	Id	Representation
<b>4.7</b>		<b>1004</b>	<b>2031</b>

Name  E A O'Sullivan

Organisation:  PRuB

RepresentationType:

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

#### SoundnessReasons

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.

#### ChangesNecessary

Paragraph	Policy	Id	Representation
<b>4.12</b>		<b>1004</b>	<b>2032</b>

Name  E A O'Sullivan

Organisation:  PRuB

RepresentationType:

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

#### SoundnessReasons

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?

ChangesNecessary

Paragraph	Policy	Id	Representation
<b>5.1</b>	<b>Policy TS1</b>	<b>1004</b>	<b>2033</b>

Name  E A O'Sullivan

Organisation:  PRuB

RepresentationType:

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

#### SoundnessReasons

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'

ChangesNecessary

Paragraph	Policy	Id	Representation
	<b>Policy TS1</b>	<b>1026</b>	<b>2107</b>

Name

Organisation:

RepresentationType:

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

Yes

SoundnessReasons

ChangesNecessary

Paragraph	Policy	Id	Representation
	<b>Policy TS1</b>	<b>1027</b>	<b>2116</b>

Name

Organisation:

RepresentationType:

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

Yes

SoundnessReasons

ChangesNecessary

**Paragraph**

**Policy**

**Id**

**Representation**

**Policy TS1**

**1003**

**2018**

Name  David Clarke

Organisation:  South Worcestershire Councils

RepresentationType:  Support

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

SoundnessReasons

ChangesNecessary

<b>Paragraph</b>	<b>Policy</b>	<b>Id</b>	<b>Representation</b>
	<b>Policy TS1</b>	<b>1006</b>	<b>2043</b>

Name

Organisation:

RepresentationType:

isPositivelyPrepared   isJustified   isEffective   isConsistentNP   isLegallyCompliant  
    No     No

**SoundnessReasons**

Draft Policy TS1 criterion 4 Draft Policy TS1 in the emerging Traveller Sites Development Plan Document (DPD) states: "Proposals for new residential Traveller pitches and sites will be supported where they conform to Policy H4 of the Core Strategy and achieve the following: ...4. any unacceptable adverse impact on landscape or local nature conservation designations, ecology, biodiversity or heritage assets can be satisfactorily mitigated." Bourne Leisure considers that Draft Policy TS1 criterion 4 does not meet either the "justified" or the "effective" tests of soundness.

The criterion does not meet the "justified" test of soundness because its wording is unclear and it does not represent the most appropriate strategy when considered against reasonable alternatives.

Firstly, as drafted, Policy TS1 criterion 4 implies that proposals for new traveller pitches and sites will be supported if any unacceptable adverse impacts on landscape or local nature conservation designations, ecology, biodiversity or heritage assets "can be" satisfactorily mitigated, rather than requiring that any unacceptable impact is actually satisfactorily mitigated.

Secondly, the draft policy does not provide adequate protection against unacceptable adverse impacts for the duration of the development post-permission implementation and could be viewed as only providing protection prior to/ on the grant of planning permission.

Draft Policy TS1 criterion 4 does not meet the "effective" test of soundness because it does not support the deliverability of Policy E4 – Tourism within the Herefordshire Core Strategy (adopted October 2015). The adopted Core Strategy states at Policy E4 – Tourism: "Herefordshire will be promoted as a destination for quality leisure visits and sustainable tourism by utilising, conserving and enhancing the county's unique environmental and heritage assets and by recognising the intrinsic character and beauty of the countryside."

Bourne Leisure is concerned that Draft Policy TS1 criterion 4 is inconsistent with this development plan policy, as it does not ensure protection for the county's natural and heritage assets and therefore does not support the deliverability of Policy E4. The Company therefore considers that Draft Policy TS1 criterion 4 should be amended as outlined within Section B5 below.

Draft Policy TS1 criterion 10 Draft Policy TS1 states at criterion 10: "...10. that any commercial activity that is proposed on the site is of a type that is appropriate to the location and does not impact on the amenity of any local residents." Bourne Leisure considers that Draft Policy TS1 criterion 10 does not meet either the "justified" or the "effective" tests of soundness.

The criterion does not meet the "justified" test of soundness because it does not represent the most



appropriate strategy when considered against reasonable alternatives. As drafted, the criterion only provides protection against any adverse impacts of commercial activity for the amenity of local residents and not for other nearby land users. Bourne Leisure considers that it is important that protection is provided for other land uses, and particularly for holiday accommodation.

Tourism provides significant benefits for the local economy by attracting visitor expenditure, creating jobs and attracting investment. If visitors are deterred from visiting an area as a result of adverse impacts that have arisen from inappropriate commercial activity, these economic benefits from the tourist sector would be reduced.

Draft Policy TS1 criterion 10 does not meet the “effective” test of soundness because it does not provide protection for the amenity of those visiting the area and therefore does not support the deliverability of Policy E4 – Tourism within the Herefordshire Core Strategy (adopted October 2015). Policy E4 seeks to promote Herefordshire as a destination for sustainable tourism and to support the tourism industry.

However, Bourne Leisure considers that the proposed wording of Draft Policy TS2 criterion 5, which applies to plots for travelling show people, is more appropriately worded, as it recognises the need to assess the impacts of commercial activity on all neighbouring land users. This criterion states: “The commercial activity of the site should not impact on the amenity of local residents and other land users. Planning conditions may be considered to reduce the impact from noise to nearby residential properties or businesses.”

#### Changes Necessary

Draft Policy TS1 criterion 4 Bourne Leisure considers that Draft Policy TS1 criterion 4 should be amended as follows: “Proposals for new residential Traveller pitches and sites will be supported where they conform to Policy H4 of the Core Strategy and achieve the following:  
...4. any unacceptable adverse impact on landscape or local nature conservation designations, ecology, biodiversity or heritage assets can be satisfactorily mitigated and that mitigation maintained for the duration of the permission.”

Draft Policy TS1 criterion 10 Bourne Leisure considers that Draft Policy TS1 criterion 10 should be amended as follows: “Proposals for new residential Traveller pitches and sites will be supported where they conform to Policy H4 of the Core Strategy and achieve the following:

...10. that any commercial activity that is proposed on the site is of a type that is appropriate to the location and does not impact on the amenity of any local residents or other land users. Planning conditions may be considered to reduce the impact from noise to nearby residential properties or businesses.” Bourne Leisure considers that these proposed amendments would make the draft policy sound.

<b>Paragraph</b>	<b>Policy</b>	<b>Id</b>	<b>Representation</b>
	<b>Policy TS1</b>	<b>1014</b>	<b>2061</b>

Name

Organisation:

RepresentationType:

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

SoundnessReasons

The Policy TS1 gives an open door for Travellers to keep their animals and provide grazing areas. This has already had an impact on other land users in being unable to gain access to their own land. Animal welfare issues should be called into question here as well as strict monitoring of the movement of animals. The policy also promotes a mixed business and residential accommodation for the lifestyle of the Travellers. As the proposal is for a temporary site, written apparently from a model used in Leeds. I have evidence that temporary Traveller Sites in Lincolnshire and Northamptonshire have turned into dumping grounds for waste, metal scrap and tyres. Therefore becoming uninhabitable.

ChangesNecessary

<b>Paragraph</b>	<b>Policy</b>	<b>Id</b>	<b>Representation</b>
	<b>Policy TS1</b>	<b>1044</b>	<b>2145</b>

Name

Organisation:

RepresentationType:

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

SoundnessReasons

ChangesNecessary

None

<b>Paragraph</b>	<b>Policy</b>	<b>Id</b>	<b>Representation</b>
	<b>Policy TS1</b>	<b>1009</b>	<b>2052</b>

Name  Kezia Taylerson

Organisation:  Historic England

RepresentationType:  Objection

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

SoundnessReasons

We welcome the reference in Policy TS1 Residential Travellers Pitches and Sites to overcoming any potential mitigation measures for heritage assets. We welcome the inclusion of the term ‘heritage asset’ in the policy as this covers designated and non-designated heritage assets. We would welcome the inclusion of a clause that seeks to protect heritage assets in the first instance, then that looks for mitigation measures to avoid impact and also seeks opportunities for enhancement, in line with the National Planning Policy Framework (NPPF).

ChangesNecessary

<b>Paragraph</b>	<b>Policy</b>	<b>Id</b>	<b>Representation</b>
	<b>Policy TS1</b>	<b>1034</b>	<b>2125</b>

Name  David Hunter-Miller

Organisation:  Brockhampton Group Parish Council

RepresentationType:  Objection

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

No

SoundnessReasons

Brockhampton Group Parish Council considered this document at their meeting 22/11/17. In respect of the Openfields Caravan Site (Linton), it was felt that the plot was already sufficiently large in relation to both the size of the parish and the needs of the current occupiers of the site. Concern was also raised regarding the previous poor management of the site; closer supervision is requested in future to ensure the satisfactory integration of new families with the community.

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS1**                      **1036**                      **2134**

Name

Organisation:

RepresentationType:

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant  
No

SoundnessReasons

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS1**                      **1039**                      **2136**

Name

Organisation:

RepresentationType:

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

Travellers should not have any sites made available to them. At least one of these sites would threaten my safety and peace of mind.

ChangesNecessary

Abandon it.

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
   **Policy TS1**                      **1005**                      **2035**

Name

Organisation:

RepresentationType:

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

Do not support. Most of these requirements would be incorporated in any planning application anyway - foul and surface water drainage, safe access, play areas, landscaping etc. 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.

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

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
   **Policy TS1**                      **1015**                      **2156**

Name

Organisation:

RepresentationType:

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

I have set out my concerns in my earlier responses

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS1**                      **1040**                      **2144**

Name

Organisation:

RepresentationType:

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

Yes

SoundnessReasons

ChangesNecessary

I would ask for more policing policy input. That there is a recognised and long term youth policing issue in Bromyard and this could lead to rivalry issues (gangs)

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS1**                      **1002**                      **2009**

Name

Organisation:

RepresentationType:

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS1**                      **1016**                      **2073**

Name

Organisation:

RepresentationType:

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

Yes

SoundnessReasons

Positively Prepared

ChangesNecessary

**Paragraph****Policy****Id****Representation****Policy TS1****1024****2101**Name  Organisation: RepresentationType: 

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

Yes

**SoundnessReasons**

More caring and sympathetic provision, however I am not a professional and do not feel that I have the skill or ability to revise adequately the wording.

I have little to add concerning the changes or additions to the other sites due to my lack of familiarity or knowledge concerning them although I would suggest that after looking at the associated documents there seems to be little or no recognition of the value and importance of such sites as The Yoke Farm etc. The encouragement of such small independent private sites with less emphasis on hard standing, hard structure amenity blocks and the like would have less environmental, visual and financial impact upon the local community. I believe that the rigid application of standard 'site requirements' in these cases mitigates against flexibility of site provision with particular emphasis on new, private or self build, low impact, need-responsive, low cost developments.

In favour of adequate and sensible provision. Criticism is more with the apparent narrowness of the recommended types of site in that there appears to be no mention of more informal possibilities which have often had much success for those who have resorted to them, also believe it is important that the application and interpretation of existing guidelines should be flexibly and imaginatively interpreted. TS 1 does not go far enough or in quite the right direction but I think we should all be grateful for any increase or improvement in site provision.

**ChangesNecessary**



**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS1**                      **1020**                      **2080**

Name

Organisation:

RepresentationType:

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

The document is probably useful to professionals in this subject but close to incomprehensible to the general public

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS1**                      **1023**                      **2090**

Name

Organisation:

RepresentationType:

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

No opinion

ChangesNecessary

<b>Paragraph</b>	<b>Policy</b>	<b>Id</b>	<b>Representation</b>
	<b>Policy TS1</b>	<b>1025</b>	<b>2104</b>

Name

Organisation:

RepresentationType:

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

Yes

SoundnessReasons

Over many years their presence at the site behind the Linton Industrial site has caused trouble to the locals , the light industry at the site and the supporting services--medical, police, nurses. The parish Co. have always pointed this out and been ignored. (REDACTED COMMENT)

Better to site social housing there. No security fences have ever held the travellers back from onslaught onto the pit, the refuse area , and hutted industry.

ChangesNecessary

<b>Paragraph</b>	<b>Policy</b>	<b>Id</b>	<b>Representation</b>
	<b>Policy TS1</b>	<b>1001</b>	<b>2001</b>

Name

Organisation:

RepresentationType:

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

SoundnessReasons

We are supportive of the aims, objectives and policies of the Development Plan Document (DPD) and particularly welcome the inclusion of Policy TS1, specifically criteria 9 which gives the assurance that there are suitable arrangements in place with regard to surface and foul water disposal.

We would however recommend the addition of the following wording to ensure a suitable water supply can be provided without detriment to existing customers: 9) Suitable arrangements for clean water supply, foul sewage disposal and surface water drainage, and where opportunities for Sustainable Drainage Systems particularly for permeable surfaces are maximised.

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS1**                      **1022**                      **2081**

Name  Giles Boardman

Organisation:

RepresentationType:  Support

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

Yes

SoundnessReasons

Positively prepared

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS1**                      **1017**                      **2074**

Name  P  Cooke

Organisation:

RepresentationType:  Support

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

Consistent with national policy

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS2**                      **1003**                      **2019**

Name  David Clarke

Organisation:  South Worcestershire Councils

RepresentationType:  Support

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS2**                      **1023**                      **2091**

Name  Paul Halford

Organisation:

RepresentationType:

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

No opinion

ChangesNecessary

Paragraph	Policy	Id	Representation
	Policy TS2	1022	2082

Name  Giles Boardman

Organisation:

RepresentationType:  Support

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

Yes

SoundnessReasons

Justified

I believe that it is important that all children should have access to schools. So TS2 with the "Live Work" site allows this.

ChangesNecessary

<b>Paragraph</b>	<b>Policy</b>	<b>Id</b>	<b>Representation</b>
	<b>Policy TS2</b>	<b>1006</b>	<b>2044</b>

Name

Organisation:

RepresentationType:

isPositivelyPrepared	isJustified	isEffective	isConsistentNP	isLegallyCompliant
	No	No		

**SoundnessReasons**

Draft Policy TS2 criterion 5 Draft Policy TS2 criterion 5 states: “The commercial activity of the site should not impact on the amenity of local residents and other land users. Planning conditions may be considered to reduce the impact from noise to nearby residential properties or businesses.” Bourne Leisure endorses the principle of this criterion, which recognises the need to protect against adverse impacts of commercial activity on the amenity of any land users, not just local residents.

However, the Company considers that it should be strengthened to state that commercial activity must not impact on the amenity of local residents or other land users. As drafted, Bourne Leisure considers that this Draft Policy TS2 criterion 5 does not meet the “justified” or the “effective” test of soundness. This draft criterion does not meet the “justified” test because it does not represent the most appropriate strategy when considered against reasonable alternatives.

Tourism provides significant benefits for the local economy by attracting visitor expenditure, creating jobs and attracting investment. If visitors are deterred from visiting an area these economic benefits would be reduced. It is therefore important that adequate protection is provided for guests at holiday accommodation venues.

Draft Policy TS2 criterion 5 does not meet the “effective” test of soundness because it does not support the deliverability of Policy E4 – Tourism within the Herefordshire Core Strategy (adopted October 2015). Policy E4 – Tourism states: “Herefordshire will be promoted as a destination for quality leisure visits and sustainable tourism by utilising, conserving and enhancing the county’s unique environmental and heritage assets and by recognising the intrinsic character and beauty of the countryside.” If the amenity of holiday accommodation destinations is not adequately protected, Bourne Leisure is concerned that Policy E4 within the adopted Core Strategy will not be deliverable. Proposed amended wording for this criterion is set out in Section B5 below.

Draft Policy TS2 – proposed additional criterion Draft Policy TS2 in the emerging Traveller Sites DPD states that planning applications for new plots for travelling show people will be encouraged to meet the identified need where they fulfil certain defined criteria. However, these criteria do not include protection against any unacceptable adverse impacts on landscape or local nature conservation designations, ecology, biodiversity or heritage assets. Bourne Leisure considers that Draft Policy TS2 does not meet either the “justified” or the “effective” test of soundness.

This draft policy does not meet the “justified” test of soundness because it does not represent the most appropriate strategy when considered against reasonable alternatives. In particular, Bourne Leisure would like to draw the local planning authority’s attention to the need to protect the natural environment and heritage assets within Herefordshire from any adverse impacts of development. The

natural environment and heritage assets have a key role to play in supporting the tourism industry in Herefordshire. If visitors are deterred from visiting an area, the local economic benefits stemming from the tourist industry will be reduced.

Draft Policy TS2 does not meet the “effective” test of soundness because it does not support the deliverability of Policy E4 – Tourism within the Herefordshire Core Strategy (adopted October 2015). Policy E4 seeks to promote Herefordshire as a destination for sustainable tourism and to support the tourism industry by “utilising, conserving and enhancing the county’s unique environmental and heritage assets and by recognising the intrinsic character and beauty of the countryside”. If the county’s environmental and heritage assets are not appropriately protected, this could have an impact on the deliverability of Policy E4, and consequently, the growth of the tourism sector within the local economy.

Bourne Leisure therefore considers that Draft Policy TS2 should include a criterion stating that proposals for travelling show people plots will be supported only if any unacceptable adverse impacts on landscape or local nature conservation designations, ecology, biodiversity or heritage assets are satisfactorily mitigated. This would align with the approach taken by the Local Planning Authority in Draft Policy TS1. Proposed wording for this criterion is set out in Section B5 below, based upon Bourne Leisure’s suggested amended wording of Draft Policy TS1 criterion 4.

ChangesNecessary

Draft Policy TS2 criterion 5 Bourne Leisure considers that Draft Policy TS2 criterion 5 should be amended as follows in order to make it sound: “The commercial activity of the site should must not impact on the amenity of local residents and other land users. Planning conditions may be considered to reduce the impact from noise to nearby residential properties or businesses.” Draft Policy TS2 – proposed additional criterion Bourne Leisure considers that the following criterion should be added to Draft Policy TS2 in order to make it sound: “any unacceptable adverse impact on landscape or local nature conservation designations, ecology, biodiversity or heritage assets is satisfactorily mitigated for the duration of the permission.”

Paragraph	Policy	Id	Representation
	<b>Policy TS2</b>	<b>1025</b>	<b>2105</b>
Name	<input type="text" value="D"/>	<input type="text" value="Gamgee Boddington"/>	
Organisation:	<input type="text"/>		
RepresentationType:	<input type="text" value="Support"/>		
isPositivelyPrepared	isJustified	isEffective	isConsistentNP
	isLegallyCompliant	Yes	
SoundnessReasons	No comment		
ChangesNecessary			

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS2**                      **1039**                      **2137**

Name  Jane Talbot

Organisation:

RepresentationType:

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

This is being deliberately difficult to object to the whole scheme.

ChangesNecessary

Abandon it.

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS2**                      **1002**                      **2010**

Name  Steve Davis

Organisation:

RepresentationType:

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

ChangesNecessary



Paragraph	Policy	Id	Representation
	<b>Policy TS2</b>	<b>1001</b>	<b>2002</b>

Name  Ryan Norman

Organisation:  Welsh Water

RepresentationType:  Support

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

#### SoundnessReasons

With regard to Policy TS2, we would recommend the replication of the above criteria 9 for the same reason as previously stated.

#### ChangesNecessary

Paragraph	Policy	Id	Representation
	<b>Policy TS2</b>	<b>1044</b>	<b>2146</b>

Name  Anonymous

Organisation:

RepresentationType:  Support

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

Yes

#### SoundnessReasons

#### ChangesNecessary

Paragraph	Policy	Id	Representation
	<b>Policy TS2</b>	<b>1015</b>	<b>2066</b>

Name  Luke Clements

Organisation:

RepresentationType:  Objection

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

SoundnessReasons

I have set out my concerns in my earlier responses

ChangesNecessary

I have set out my concerns in my earlier responses

Paragraph	Policy	Id	Representation
	<b>Policy TS2</b>	<b>1026</b>	<b>2108</b>

Name  B  Straker

Organisation:

RepresentationType:  Support

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

Yes

SoundnessReasons

ChangesNecessary

<b>Paragraph</b>	<b>Policy</b>	<b>Id</b>	<b>Representation</b>
<b>5.2</b>	<b>Policy TS2</b>	<b>1004</b>	<b>2034</b>

Name  E A O'Sullivan

Organisation:  PRuB

RepresentationType:

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

SoundnessReasons

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.

ChangesNecessary

<b>Paragraph</b>	<b>Policy</b>	<b>Id</b>	<b>Representation</b>
	<b>Policy TS2</b>	<b>1034</b>	<b>2126</b>

Name  David Hunter-Miller

Organisation:  Brockhampton Group Parish Council

RepresentationType:  Support

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

Yes

SoundnessReasons

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS2**                      **1017**                      **2075**

Name

Organisation:

RepresentationType:

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS2**                      **1027**                      **2117**

Name

Organisation:

RepresentationType:

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

Would welcome notification of sites selected for Travelling showpeople.

ChangesNecessary

Paragraph	Policy	Id	Representation
	Policy TS3	1014	2062

Name

Organisation:

RepresentationType:

isPositivelyPrepared  isJustified  isEffective  isConsistentNP  isLegallyCompliant

#### SoundnessReasons

Policy TS3 sets out the site proposals as a stopping place for five pitches. The intention is for the area to be used on a short stay basis only, of up to fourteen days and not to be occupied all year. However this statement is contradicted in being open to negotiation on a case by case basis. The site therefore has the potential of eventually becoming a permanent site by default.

I would welcome further information and sight of a detailed budget plan from Hereford Council in allocating the necessary funds to carry out the construction work, drainage systems and fencing necessary. Plus the management costs in maintaining the site. How staff will monitor residents and vehicles in adhering to the fourteen day period. Plus operating a system in obtaining rent due from any occupied pitches.

#### ChangesNecessary

Paragraph	Policy	Id	Representation
	<b>Policy TS3</b>	<b>1005</b>	<b>2036</b>

Name

Organisation:

RepresentationType:

isPositivelyPrepared  isJustified  isEffective  isConsistentNP  isLegallyCompliant

#### SoundnessReasons

Do not support. This will give 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. 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 to Leominster.

#### ChangesNecessary

A site in the south of the county as well as one in the north would have been an acceptable compromise.

Paragraph	Policy	Id	Representation
	<b>Policy TS3</b>	<b>1050</b>	<b>2099</b>

Name

Organisation:

RepresentationType:

isPositivelyPrepared  isJustified  isEffective  isConsistentNP  isLegallyCompliant

#### SoundnessReasons

I feel a temporary stopping site in Leominster policy number TS3 is a waste of funding as there is a need for more permanent plots. Leominster transit site will not last and cost council money. Building a permanent site would lessen need for plots as a lot of travellers have no permanent plots.

#### ChangesNecessary

Paragraph	Policy	Id	Representation
	<b>Policy TS3</b>	<b>1008</b>	<b>2046</b>

Name

Organisation:

RepresentationType:

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

#### SoundnessReasons

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.

#### ChangesNecessary

Paragraph	Policy	Id	Representation
	<b>Policy TS3</b>	<b>1039</b>	<b>2138</b>

Name

Organisation:

RepresentationType:

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

#### SoundnessReasons

As above

#### ChangesNecessary

Abandon it.

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS3**                      **1034**                      **2127**

Name  David Hunter-Miller

Organisation:  Brockhampton Group Parish Council

RepresentationType:  Support

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant  
Yes

SoundnessReasons

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS3**                      **1023**                      **2092**

Name  Paul Halford

Organisation:

RepresentationType:  Objection

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

This site is close to a major highway roundabout and it appears access will be from the A49. It is not clear whether such access is possible within the normal safety requirements for highway access and therefore whether the proposal is deliverable.

ChangesNecessary



Paragraph	Policy	Id	Representation
	<b>Policy TS3</b>	<b>1038</b>	<b>2135</b>

Name  Philip Brown

Organisation:  Humber, Ford & Stoke Prior Group Parish Council

RepresentationType:  Objection

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

#### SoundnessReasons

The Council considers that the policy is not sound, as it does not sufficiently take into account the objections raised by the Council in September 2016 namely: concerns over access, the site being in a flood-zone, possible damage to the habitat, especially the River Lugg SSSI, and the visual impact on one of the main approaches to Leominster. These are matters of national and local planning policy which would indicate that this is not a suitable site for a temporary stopping place.

#### ChangesNecessary

The proposed site should be re-considered against the objections and the national and local policies concerning these matters.

Paragraph	Policy	Id	Representation
	<b>Policy TS3</b>	<b>1049</b>	<b>2097</b>

Name  Charlotte Lock

Organisation:

RepresentationType:  Objection

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

#### SoundnessReasons

I feel a temporary stopping site in Leominster policy number TS3 is a waste of funding as there is a need for more permanent plots. Leominster transit site will not last and cost council money. Building a permanent site would lessen need for plots as a lot of travellers have no permanent plot.

#### ChangesNecessary

Paragraph	Policy	Id	Representation
	<b>Policy TS3</b>	<b>1010</b>	<b>2056</b>

Name

Organisation:

RepresentationType:

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

Yes

SoundnessReasons

ChangesNecessary

Paragraph	Policy	Id	Representation
	<b>Policy TS3</b>	<b>1012</b>	<b>2058</b>

Name

Organisation:

RepresentationType:

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

SoundnessReasons

- 1) The site is part of the traditional Lammas Meadows and should be retained as part of Leominster's heritage.
- 2) There are 5 pitches. Anyone observing travellers coming into the town will have been aware that there are almost always more than 5 units. It is unrealistic to assume that 5 will go to the temporary site and the others elsewhere.
- 3) Facilities will be provided when the travellers arrive. How is this to be operated? It is highly unlikely that the travellers will book ahead so nothing will be there when they arrive.
- 4) The site is outside the town and there is no public transport to the town's facilities.
- 5) Access to the site is within yards of the A44/A49 roundabout. Vehicles will come off the roundabout and find large caravans exiting the site in their path.
- 6) The site has been recently used for fly-tipping. The rubbish is seldom cleared. Making it even more accessible invites even more fly-tipping.

ChangesNecessary

Paragraph	Policy	Id	Representation
	<b>Policy TS3</b>	<b>1044</b>	<b>2147</b>

Name  Anonymous

Organisation:

RepresentationType:  Support

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

Yes

SoundnessReasons

ChangesNecessary

None

Paragraph	Policy	Id	Representation
	<b>Policy TS3</b>	<b>1001</b>	<b>2003</b>

Name  Ryan Norman

Organisation:  Welsh Water

RepresentationType:  Support

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

SoundnessReasons

Policy TS3 – Temporary Stopping Place of 5 pitches We note that this policy indicates that temporary sanitation facilities will be provided on occupation of the site and removed at the end of the stay. Should a temporary connection be required to Welsh Water’s sewerage or water supply networks then we will provide comments as and when consulted as part of the planning application and connections processes. At the northern end of the site there is a 6” distribution water main for which protection measures will be required in the form of an easement width or diversion.

ChangesNecessary

Paragraph	Policy	Id	Representation
	<b>Policy TS3</b>	<b>1015</b>	<b>2067</b>

Name  Luke Clements

Organisation:

RepresentationType:  Objection

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

SoundnessReasons

I have set out my concerns in my earlier responses

ChangesNecessary

I have set out my concerns in my earlier responses

Paragraph	Policy	Id	Representation
	<b>Policy TS3</b>	<b>1026</b>	<b>2109</b>

Name  B  Straker

Organisation:

RepresentationType:  Support

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

Yes

SoundnessReasons

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
   **Policy TS3**                      **1017**                      **2076**

Name

Organisation:

RepresentationType:

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
   **Policy TS3**                      **1029**                      **2119**

Name

Organisation:

RepresentationType:

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

I saw this plan some time ago when it was on display at the Community Centre in Leominster, and basically agreed with it, though being so near the railway and the A49 it could be dangerous for children.

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS3**                      **1003**                      **2020**

Name  David Clarke

Organisation:  South Worcestershire Councils

RepresentationType:  Support

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS3**                      **1002**                      **2011**

Name  Steve Davis

Organisation:

RepresentationType:  Support

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
   **Policy TS3**                      **1022**                      **2083**

Name  Giles Boardman

Organisation:

RepresentationType:  Support

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

Yes

SoundnessReasons

Positively Prepared.

The site on the A49 gives good accessibility but will be noisy. I'm sure there would be a need for further temporary stopping sites in the south of the county.

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
   **Policy TS3**                      **1025**                      **2106**

Name  D Gamgee Boddington

Organisation:

RepresentationType:  Support

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

Yes

SoundnessReasons

ChangesNecessary

**Paragraph****Policy****Id****Representation****Policy TS3****1024****2102**Name  Organisation: RepresentationType: 

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

**SoundnessReasons**

Comments regarding TS3 are certainly in support but also perhaps requesting that more emphasis is given to security. Taking measures to reduce the fears of objectors concerning potential criminal or anti-social acts has been given enough attention. In other areas the security of those who would use the proposed site will be given more than adequate attention

Historic legislation has made it extremely difficult, if not impossible, for Travellers to live 'on the road' legally, and therefore in order for their culture to survive they have frequently been forced to operate with scant regard for the rules and regulations set up by a settled community that neither understands nor is prepared to accept them. The provision of new legal and practical temporary stopping places, now that the use of those that were traditionally used has been made a criminal act, is an absolute and long overlooked necessity by those that make and enforce current legislation.

In the present cultural climate it should be of advantage to the local settled community as well as the itinerant or nomadic one if the Travellers who are still managing to travel in spite of legal restrictions are not forced to resort to inconvenient and inappropriate stopping places in order to accommodate their reasonable needs. This is something that has been an expense and problem for all sections of the community who have been affected by it. It is clear that this site (TS3) comes close to satisfying the relevant parts of the Council's document 'Policy H4 Traveller Sites' also specifically 'H4.22'.

It should be possible with intelligent and sympathetic design to make the site safe and secure for those that use it and also to allay the inevitable fears of those who have commercial interests in the nearby industrial estates. The fact that the local police station is situated close by is one factor which should offer some reassurance to those who fear possible criminal activity but this proximity alone should not be relied upon. If there is expected to be an increased vulnerability to possible criminal or anti-social acts caused through the area's exposure to more people passing through, then the council should consider what other steps need to be taken for reassurance concerning the safety of people and property in the area and budget for this also. I am rather surprised that there does not appear to be a recognized need for another site in the south of the county too.

**ChangesNecessary**



**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS4**                      **1005**                      **2037**

Name

Organisation:

RepresentationType:

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS4**                      **1044**                      **2148**

Name

Organisation:

RepresentationType:

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

Yes

SoundnessReasons

ChangesNecessary

None

Paragraph	Policy	Id	Representation
	Policy TS4	1034	2128

Name  David Hunter-Miller

Organisation:  Brockhampton Group Parish Council

RepresentationType:  Support

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

Yes

SoundnessReasons

ChangesNecessary

**Paragraph****Policy****Id****Representation****Policy TS4****1048****2095**

Name

Organisation:

RepresentationType:

isPositivelyPrepared

isJustified

isEffective

isConsistentNP

isLegallyCompliant

**SoundnessReasons**

I propose that the extra pitch that is being planned to be made at Romany Close is not enough the area where they plan to make it is good. The time people have been waiting there should be more made. I stress that there isn't much room at Romany Close for extra pitches but there is people desperately waiting for the pitches. I would also like to know the permanent start and end of when the pitch gets made.

Also two pitches being made at Watery Lane should be for people who don't have pitches that are homeless not for residents on there. Also once the pitches gets made could they just get on and make them as we are deperate. And at the moment my concern is extra pitches being made at Romany Close and Watery Lane. Full stop there is not enough pitches being made.

I think there should be more sites put in Hereford then family wouldn't move further afield.

(COMMENT REDACTED)

I don't think the

pitches are enough. We got family living in Brecon who have had more plots been made for there family who have kids all in 1-2 years.

**ChangesNecessary**

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
   **Policy TS4**                      **1026**                      **2110**

Name

Organisation:

RepresentationType:

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
   **Policy TS4**                      **1047**                      **2094**

Name

Organisation:

RepresentationType:

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

I Charlotte Butler think they should make more plots on Romany Close because people like myself who have lived in Hereford all my life who is in desperate need because of people with children. I strongly think that they should spend the money on making plots on Romany Close because there are 2 good places the picnic area and the office. Then spending the money on transit pictures in Leominster and I also think if they are considering on making more pitches people that has lived in Hereford all there life should be more considered than outsiders and more for people who have got kids who have lived in Hereford all their life.

ChangesNecessary

Paragraph	Policy	Id	Representation
	<b>Policy TS4</b>	<b>1001</b>	<b>2004</b>

Name  Ryan Norman

Organisation:  Welsh Water

RepresentationType:  Support

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

#### SoundnessReasons

Policy TS4 – Romany Way , Grafton Given that this pitch is proposed on an existing local authority site, there are no problems envisaged in providing a clean water supply though we will provide further comment as and when consulted at planning application stage. Should the pitch propose to connect to the public sewerage network, there is a public sewer to the north west of the site though some level of offsite works may be required in order to provide the connection.

#### ChangesNecessary

Paragraph	Policy	Id	Representation
	<b>Policy TS4</b>	<b>1015</b>	<b>2068</b>

Name  Luke Clements

Organisation:

RepresentationType:  Objection

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

#### SoundnessReasons

I have set out my concerns in my earlier responses

#### ChangesNecessary

I have set out my concerns in my earlier responses

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS4**                      **1046**                      **2093**

Name  Residents of Romany Close

Organisation:

RepresentationType:

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

I am in Favour of another plot being built, but we do need more parking spaces and the road way widening because there has been several incidents where people has had there wing mirrors taken off. Because there isn't enough room for parking for residents & visitors. Some vehicles have to reverse out of the site into the roadway & park outside on the roadway & it obstructs the ambulance depot because we haven't got any turning points.

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS4**                      **1022**                      **2084**

Name  Giles Boardman

Organisation:

RepresentationType:  Support

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

Yes

SoundnessReasons

Positively prepared

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS4**                      **1003**                      **2021**

Name  David Clarke

Organisation:  South Worcestershire Councils

RepresentationType:  Support

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS4**                      **1008**                      **2048**

Name  G Irwin

Organisation:  Environment Agency

RepresentationType:

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

See general comment from EA re site flood zones

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS4**                      **1039**                      **2139**

Name  Jane Talbot

Organisation:

RepresentationType:

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

The proposals are unsound.

ChangesNecessary

Abandon this scheme.

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS4**                      **1002**                      **2012**

Name  Steve Davis

Organisation:

RepresentationType:

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

ChangesNecessary



Paragraph	Policy	Id	Representation
	Policy TS5	1051	2100

Name

Organisation:

RepresentationType:

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

Yes

SoundnessReasons

Justified

ChangesNecessary

I believe more sites are required due to younger families coming through. I don't believe that a temporary site would help because it brings the wrong people to the area and makes life harder for the local people. (COMMENT REDACTED)

I also believe that more families now want their own sites which they have control over, instead of going onto larger sites which don't always work due to more than one family being on them.

Paragraph	Policy	Id	Representation
	Policy TS5	1050	2098

Name  Rachel Smith

Organisation:

RepresentationType:

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

#### SoundnessReasons

Improvements and extensions to sites throughout Herefordshire are of my view a good idea.

However I feel a temporary stopping site in Leominster policy number TS3 is a waste of funding as there is a need for more permanent plots. 2 and 3 plot extensions are just not enough as sites are already holding 2 families per plot. The barriers on sites are not wide enough as a wide range of traveller families are now residing in mobile homes. There are no play areas/parks on site for children which there should be a safe area for child play.

I reside on (COMMENT REDACTED) which have the smallest kitchens on any site. These need to be updated as they can not hold a washing machine and dryer together. Upgraded sites now have new buildings/porta cabins enough space to hold all white goods and sitting area. Toilets are outside. There is young children, very elderly people and disabled people. In new day rooms toilets should be inside them as bad weather can be dangerous and dark nights. All facilities should be in comfort. You can not use a shower, disability needs can not be met with the size of buildings and there is no water pressure for shower. (COMMENT REDACTED) Fence along side road is a hazard as there is no barrier and structure. Dust that comes from lorries is causing asthma to get worse. Tarmac on plots are now wearing away which is causing potholes, again dangerous. Pictures have been provided to support our application. There is a need for more plots and upgraded sites.

Phillip Hammond says the government will build 300,000 new homes a year to tackle the housing crisis until 2020 with affordable housing. Travellers who reside on sites should be given the opportunity to buy plot. Again Leominster transit site will not last and cost council money. Building a permanent site would lessen need for plots as a lot of travellers have no permanent plots. Please take this into consideration as I know majority of travellers throughout Herefordshire feel the same.  
(COMMENT REDACTED)

#### ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS5**                      **1001**                      **2005**

Name  Ryan Norman

Organisation:  Welsh Water

RepresentationType:  Support

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

Policy TS5 – Watery Lane, Lower Bullingham There are no public sewers or water mains within proximity of this site, therefore if the additional two pitches wish to connect to the public supply then off-site mains/sewers will be required at developers’ expense. We will provide further comments as and when consulted at planning application stage.

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS5**                      **1026**                      **2111**

Name  B  Straker

Organisation:

RepresentationType:  Support

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

Yes

SoundnessReasons

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
   **Policy TS5**                      **1034**                      **2129**

Name  David Hunter-Miller

Organisation:  Brockhampton Group Parish Council

RepresentationType:  Support

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant  
Yes

SoundnessReasons

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
   **Policy TS5**                      **1044**                      **2149**

Name  Anonymous

Organisation:

RepresentationType:  Support

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant  
Yes

SoundnessReasons

ChangesNecessary

None

Paragraph	Policy	Id	Representation
	Policy TS5	1039	2140

Name  Jane Talbot

Organisation:

RepresentationType:  Objection

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

SoundnessReasons

As above

ChangesNecessary

As above

Paragraph	Policy	Id	Representation
	Policy TS5	1018	2077

Name  D Thompson

Organisation:  Hereford Enterprize Zone

RepresentationType:  Support

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

SoundnessReasons

The Hereford Enterprise Zone recognises the need identified within Herefordshire to provide additional space for the travelling community and we have no objection in principle to the proposed addition of two new pitches to the Orchard Caravan Park on Watery Lane. We would reiterate comments submitted in the initial consultation in 2016 on the need to involve the Enterprise Zone in a joined up approach regarding the new access into the extension site and would again 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.

ChangesNecessary

Paragraph	Policy	Id	Representation
	Policy TS5	1015	2069

Name  Luke Clements

Organisation:

RepresentationType:  Objection

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

SoundnessReasons

I have set out my concerns in my earlier responses

ChangesNecessary

I have set out my concerns in my earlier responses

Paragraph	Policy	Id	Representation
	Policy TS5	1049	2096

Name  Charlotte Lock

Organisation:

RepresentationType:  Support

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

#### SoundnessReasons

Improvements and extensions to sites throughout Herefordshire are of my view a good idea.

However I feel a temporary stopping site in Leominster policy number TS3 is a waste of funding as there is a need for more permanent plots. 2 and 3 plot extensions are just not enough as sites are already holding 2 families per plot. The barriers on sites are not wide enough as a wide range of traveller families are now residing in mobile homes.

There are no play areas/parks on site for children which there should be a safe area for child play. (COMMENT REDACTED) which have the smallest kitchens on any site. These need to be updated as they can not hold a washing machine and dryer together. Upgraded sites now have new buildings/porta cabins enough space to hold all white goods and sitting area. Toilets are outside. There is young children, very elderly people and disabled people who struggle in cold dark nights. Toilets should be in new day rooms. All facilities should be in comfort. You can not use a shower, disability needs can not be met with the size of buildings and there is no water pressure for shower. (COMMENT REDACTED) Fence alongside the road is a hazard as there is no barrier and structure. Dust that comes from lorries is causing asthma to get worse. Tarmac on plots are now wearing away which is causing holes on plots, again dangerous. Pictures have been provided to support application. There is a need for more plots and upgraded sites.

Phillip Hammond says the government will build 300,000 new homes a year to tackle the housing crisis until 2020 with affordable housing. Traveller reside on sites should be given the opportunity to buy plots. Again Leominster transit site will not last and cost council money. Building a permanent site would lessen need for plots as a lot of travellers have no permanent plot. Please take this into consideration as I no majority of travellers feel the same.

#### ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS5**                      **1048**                      **2157**

Name  Shirley and Jimmy Butler

Organisation:

RepresentationType:

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

Also two pitches being made at Watery Lane should be for people who don't have pitches that are homeless not for residents on there. Also once the pitches gets made could they just get on and make them as we are depserate. And at the moment my concern is extra pitches being made at Romany Close and Watery Lane. Full stop there is not enough pitches being made.

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS5**                      **1005**                      **2038**

Name  P Baines

Organisation:  Herefordshire Travellers Support Group

RepresentationType:  Support

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

ChangesNecessary



**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS5**                      **1022**                      **2085**

Name  Giles Boardman

Organisation:

RepresentationType:  Support

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

Yes

SoundnessReasons

Positively prepared

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS5**                      **1002**                      **2013**

Name  Steve Davis

Organisation:

RepresentationType:  Support

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS5**                      **1008**                      **2049**

Name

Organisation:

RepresentationType:

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

See general comment from EA re site flood zones

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS5**                      **1003**                      **2022**

Name

Organisation:

RepresentationType:

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS6**                      **1022**                      **2086**

Name  Giles Boardman

Organisation:

RepresentationType:  Support

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

Yes

SoundnessReasons

Positively prepared

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS6**                      **1005**                      **2039**

Name  P Baines

Organisation:  Herefordshire Travellers Support Group

RepresentationType:  Support

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS6**                      **1002**                      **2014**

Name  Steve Davis

Organisation:

RepresentationType:

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS6**                      **1034**                      **2130**

Name  David Hunter-Miller

Organisation:

RepresentationType:

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

Lack of support to existing traveller families which have failed to satisfactorily integrate with the community

ChangesNecessary

Brockhampton Group Parish Council considered this document at their meeting 22/11/17. In respect of the Openfields Caravan Site (Linton), it was felt that the plot was already sufficiently large in relation to both the size of the parish and the needs of the current occupiers of the site. Concern was also raised regarding the previous poor management of the site; closer supervision is requested in future to ensure the satisfactory integration of new families with the community.

<b>Paragraph</b>	<b>Policy</b>	<b>Id</b>	<b>Representation</b>
	<b>Policy TS6</b>	<b>1001</b>	<b>2006</b>

Name

Organisation:

RepresentationType:

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

SoundnessReasons

Policy TS6 – Openfields caravan site, Bromyard Given that the additional two pitches are on an existing local authority sites, there are no problems envisaged in providing a clean water supply though we will provide further comment as and when consulted at planning application stage. Should the pitches propose to connect to the public sewerage network, the nearest public sewer is located in the A44, therefore off-site sewers will be required at developers’ expense.

ChangesNecessary

<b>Paragraph</b>	<b>Policy</b>	<b>Id</b>	<b>Representation</b>
	<b>Policy TS6</b>	<b>1026</b>	<b>2112</b>

Name

Organisation:

RepresentationType:

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

Yes

SoundnessReasons

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
   **Policy TS6**                      **1015**                      **2070**

Name  Luke Clements

Organisation:

RepresentationType:

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

I have set out my concerns in my earlier responses

ChangesNecessary

I have set out my concerns in my earlier responses

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
   **Policy TS6**                      **1003**                      **2023**

Name  David Clarke

Organisation:

RepresentationType:

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
   **Policy TS6**                      **1039**                      **2141**

Name  Jane Talbot

Organisation:

RepresentationType:

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

Really?

ChangesNecessary

As above

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
   **Policy TS6**                      **1044**                      **2150**

Name  Anonymous

Organisation:

RepresentationType:

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

Yes

SoundnessReasons

ChangesNecessary

None

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
   **Policy TS6**                      **1009**                      **2053**

Name  Kezia Taylerson

Organisation:  Historic England

RepresentationType:

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

We note the reference within paragraph 6.22 (relating to Policy TS6) to a potential negative effect for a Grade II heritage asset, identified within the SA. Setting impacts are not only limited to visual setting issues (See Good Practice Advice Note 3: The Setting of Heritage Assets on Historic England’s website) and it is possible that harm could arise, even where there is no visual connection between a development site and a heritage asset. We would require sight of the heritage assessment for this site, in order to make a judgement as to whether we consider that harm is likely or what mitigation measures could be appropriate. We note the potential landscaping measure identified but are not clear how relevant this is if there is no visibility between the development site and the heritage asset? Are other mitigation measures more appropriate?

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
   **Policy TS6**                      **1008**                      **2050**

Name  G     Irwin

Organisation:  Environment Agency

RepresentationType:

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

See general comment from EA re site flood zones

ChangesNecessary



Paragraph	Policy	Id	Representation
	<b>Policy TS7</b>	<b>1001</b>	<b>2007</b>

Name  Ryan Norman

Organisation:  Welsh Water

RepresentationType:  Support

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

#### SoundnessReasons

Policy TS7 – Pembridge Caravan Site Given that the additional four pitches are on an existing local authority site, there are no problems envisaged in providing a clean water supply though we will provide comments as and when consulted at planning application stage. There are no public sewers within proximity of the site, therefore if site proposes to connect to the nearest public sewerage network then significant off-site sewers will be required at great expense to the developer.

#### ChangesNecessary

Paragraph	Policy	Id	Representation
	<b>Policy TS7</b>	<b>1015</b>	<b>2071</b>

Name  Luke Clements

Organisation:

RepresentationType:  Objection

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

#### SoundnessReasons

I have set out my concerns in my earlier responses

#### ChangesNecessary

I have set out my concerns in my earlier responses

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS7**                      **1026**                      **2113**

Name

Organisation:

RepresentationType:

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

Yes

SoundnessReasons

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS7**                      **1005**                      **2040**

Name

Organisation:

RepresentationType:

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

An isolated site - difficult to manage at present size - additional management capacity may be required.

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS7**                      **1003**                      **2024**

Name  David Clarke

Organisation:  South Worcestershire Councils

RepresentationType:  Support

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS7**                      **1022**                      **2087**

Name  Giles Boardman

Organisation:

RepresentationType:  Support

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

Positively prepared

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
   **Policy TS7**                      **1039**                      **2142**

Name  Jane Talbot

Organisation:

RepresentationType:

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

This survey is a joke

ChangesNecessary

Abandon

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
   **Policy TS7**                      **1009**                      **2054**

Name  Kezia Taylerson

Organisation:

RepresentationType:

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

Paragraph 6.25 (relating to Policy TS7) identifies that there may be adverse effects for heritage assets in the vicinity. Paragraph 6.27 identifies that there are designated heritage assets, of the highest importance, that could be effected by the proposed development. We would require more information on how this development could impact on the setting of these heritage assets and what mitigation measures may therefore be appropriate. It may be that design considerations should be included within the Plan, to ensure that any potential harm can be overcome, when any future planning applications are received by the Council.

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS7**                      **1044**                      **2151**

Name  Anonymous

Organisation:

RepresentationType:  Support

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

Yes

SoundnessReasons

ChangesNecessary

None

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
**Policy TS7**                      **1035**                      **2133**

Name  Rebecca Bissell

Organisation:  Pembridge Parish Council

RepresentationType:  Support

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

Yes

SoundnessReasons

Hereford Council has amended the plan to build behind the current site instead of along the roadway as requested, the litter is currently being managed well and it is hoped will continue. There should be no access from the rear on the Kingspan road from the site.

ChangesNecessary

<b>Paragraph</b>	<b>Policy</b>	<b>Id</b>	<b>Representation</b>
	<b>Policy TS7</b>	<b>1008</b>	<b>2051</b>

Name

Organisation:

RepresentationType:

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

SoundnessReasons

See general comment from EA re site flood zones

ChangesNecessary

<b>Paragraph</b>	<b>Policy</b>	<b>Id</b>	<b>Representation</b>
	<b>Policy TS7</b>	<b>1034</b>	<b>2131</b>

Name

Organisation:

RepresentationType:

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

Yes

SoundnessReasons

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
   **Policy TS7**                      **1002**                      **2015**

Name  Steve Davis

Organisation:

RepresentationType:  Support

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

ChangesNecessary

**Paragraph****Policy****Id****Representation****GTAA****1015****2065**Name  Luke ClementsOrganisation: RepresentationType:  Objection

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

No No No No

**SoundnessReasons**

Specifically I have serious reservations about whether the Council's Travellers' Sites Document satisfy the requirements of 'soundness'. In relation to the necessary criteria my view is as follows:

1. Is the plan positively prepared?' No. The plan does not address the real need 'now' for accommodation. It uses a discredited technique - ie setting the turnover of pitches against the need for them. Those leaving a particular pitch do not evaporate: they travel (generally within the local authority area), circulate and return.
2. Is the plan justified? No. The plan fails to assess the real demand: the actual demand in Herefordshire. I understand that there are about 40 or more Gypsies and Travellers on the waiting list for pitches and that about nine families are 'doubling up' on relative's pitches.
3. Is the plan effective – ie is it deliverable? This strikes me as highly dubious. I have noted above the failure of Herefordshire Council to produce any additional sites since it came into being. I understand that it can cost upwards of £80,000 of public money to provide an individual pitch. In a time of politically imposed austerity I consider it unlikely that this level of funding will become available. On this analysis, therefore, the plan will not be effective: it will not 'deliver'.
4. Is it consistent with government policy? No. The government's stated ambition is 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'. This is not an effective strategy, for the reasons stated above.

I am particularly concerned that the nine pitches that are proposed are for future need. This means that there is a failure to address the existing need – ie the severe shortage of sites that Gypsies and Travellers in Herefordshire are currently in desperate need of. It is clear that the current plan is seeking to exploit the revised definition of a Gypsy and Traveller. This is a troubling, unnecessary and a high risk strategy. What should be done is to assess the demand without seeking to subtract from the calculation people who may not meet the new definition. These people have accommodation needs regardless of this policy alteration. It is high risk because it is possible that the courts will find that this definition offends fundamental principles of Equality Law. In that case the council will have embarked (unnecessarily) on a revised strategy that will have to be fundamentally revised.

Even putting to one side the council's reliance on the revised definition, as noted above, it is entirely inappropriate to offset against the identified need for six new pitches per year, those Gypsies and Travelling People who are vacating pitches. This not only presupposes that such families 'evaporate' for 'count' purposes but it also disenfranchises the children of these families – for whom there appear to me to be no provision in the calculations – and ignores the fact that many such families are already doubling up on exiting local authority pitches.

**ChangesNecessary**



I do not regard it as my role to explain how the policy can be made 'legally compliant or sound'. This is the role of the council. My role is to explain why it fails in this respect. To set out my full views, I make the following comments.

I strongly support the need for a significant increase in the number of pitches for Gypsies and Travellers to be provided for in the Travellers Sites Development Plan. For the reasons detailed below, I express severe reservations about the 'soundness' of the Travellers' Sites Document and in consequence the proposed Development Plan Document.

As the outline notes, there has been a travelling community in Herefordshire for the last 500 years. Herefordshire has one of the highest per capital populations of Gypsies and Travellers for any council area in the UK and this has immensely enriched the character and culture of our community. Gypsies and Travellers have (among many other unique contributions) played a crucial role in sustaining the seasonal needs of our agricultural economy.

Since the 1940s successive planning policies have made it increasingly difficult for Gypsies and Travellers to follow their traditional way of life and they consistently have failed to ensure that there is an adequate supply of planning permissions to make this possible. This state of affairs has been exacerbated by consistent underestimates of the demand for land on which Gypsies and Travellers can legally pitch their caravans in Herefordshire.

The result of this inadequate supply, combined with the criminalisation of camping on land without planning permission, has been that many Gypsies and Travellers have had little or no choice but to move into housing – a trend particularly marked since the 1990's. I believe that many Gypsies and Travellers in this position in Herefordshire have never relinquished their wish to resume their traditional way of life and that the 'counts' recorded in your Travellers' Sites Document do not fully take this factor into account.

Not all Gypsies and Travellers have the financial resources or the stamina to acquire land and then to pursue private planning applications (which are invariably opposed by the Council) and so there is a clear need for a significant supply of land to be made available for council provided sites. This does not appear, in my opinion, to have been adequately addressed in the Travellers' Sites Document.

I believe that when Herefordshire Council came into being it inherited 82 council pitches and that today this number has dwindled to 53. I also note that during its existence Herefordshire Council has not created a single new site. On this basis I express considerable concern about the allocation figures and the commitment of this council to address this need. It is, in terms of overall planning demand, a small challenge – but it concerns one of the most marginalised and 'discriminated against' of communities and is one that deserves very particular attention in the proposed Local Plan.

Specifically I have serious reservations about whether the Council's Travellers' Sites Document satisfy the requirements of 'soundness'.

In relation to the necessary criteria my view is as follows:

1. Is the plan positively prepared? No. The plan does not address the real need 'now' for accommodation. It uses a discredited technique - ie setting the turnover of pitches against the need for them. Those leaving a particular pitch do not evaporate: they travel (generally within the local authority area), circulate and return.

2. Is the plan justified? No. The plan fails to assess the real demand: the actual demand in Herefordshire. I understand that there are about 40 or more Gypsies and Travellers on the waiting list for pitches and that about nine families are 'doubling up' on relative's pitches.

3. Is the plan effective – ie is it deliverable? This strikes me as highly dubious. I have noted above the failure of Herefordshire Council to produce any additional sites since it came into being. I understand that it can cost upwards of £80,000 of public money to provide an individual pitch. In a time of

politically imposed austerity I consider it unlikely that this level of funding will become available. On this analysis, therefore, the plan will not be effective: it will not 'deliver'.

4. Is it consistent with government policy? No. The government's stated ambition is 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'. This is not an effective strategy, for the reasons stated above.

I am particularly concerned that the nine pitches that are proposed are for future need. This means that there is a failure to address the existing need – ie the severe shortage of sites that Gypsies and Travellers in Herefordshire are currently in desperate need of. It is clear that the current plan is seeking to exploit the revised definition of a Gypsy and Traveller. This is a troubling, unnecessary and a high risk strategy. What should be done is to assess the demand without seeking to subtract from the calculation people who may not meet the new definition. These people have accommodation needs regardless of this policy alteration. It is high risk because it is possible that the courts will find that this definition offends fundamental principles of Equality Law.

In that case the council will have embarked (unnecessarily) on a revised strategy that will have to be fundamentally revised. Even putting to one side the council's reliance on the revised definition, as noted above, it is entirely inappropriate to offset against the identified need for six new pitches per year, those Gypsies and Travelling People who are vacating pitches. This not only presupposes that such families 'evaporate' for 'count' purposes but it also disenfranchises the children of these families – for whom there appear to me to be no provision in the calculations – and ignores the fact that many such families are already doubling up on exiting local authority pitches.

Paragraph	Policy	Id	Representation
	<b>GTAA</b>	<b>1034</b>	<b>2132</b>

Name  David Hunter-Miller

Organisation:  Brockhampton Group Parish Council

RepresentationType:  Support

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

Yes

SoundnessReasons

ChangesNecessary

**Paragraph**

**Policy**

**Id**

**Representation**

**GTAA**

**1044**

**2152**

Name

Anonymous

Organisation:

RepresentationType:

Support

isPositivelyPrepared

isJustified

isEffective

isConsistentNP

isLegallyCompliant

Yes

SoundnessReasons

ChangesNecessary

None

Paragraph	Policy	Id	Representation
	GTAA	1052	2154

Name

Organisation:

RepresentationType:

isPositivelyPrepared  isJustified  isEffective  isConsistentNP  isLegallyCompliant

#### SoundnessReasons

Paragraph 4.2 Consistency of approach to methodology and the assessment of traveller accommodation requirements assists the consideration of boundary issues and the broader understanding Traveller community needs and provision. The use of similar methodology for assessment of accommodation need also helps to provide clarity for comparison purposes. The Shropshire GTAA, also prepared by Arc4, also takes into account turnover of pitches in calculating need for new pitches, this approach being accepted as reasonable by the Inspector in the examination of the existing Local Plan ( SAMDev Plan ) which was adopted in 2015. The updated Shropshire GTAA (2017 has been published on the Council's website as part of the evidence base for the review of the Shropshire Local Plan covering the time period to 2036. This GTAA has re-examined pitch supply and the role of turnover and, has responded to evidence of unusually high turnover on one site, by excluding this turnover as atypical and thereby moderating the turnover figure. This is felt to be a reasonable approach, which together with ignoring potential turnover on private sites for which no data is held, does not overestimate the likely contribution of turnover and accords with the spirit of the SAMDev Plan Inspector's previous conclusions. Table 1, paras 4.8 – 4.11 There is some mismatch in time periods quoted for the local plan period with both 2030/31 & 2031/32 specified. Paragraph 4.12. It is questioned whether there is a typo at the end of line 3 which excludes the word year and the following comments are made on the basis that the paragraph refers to the five year requirement. Additional provision of pitches which improve the qualitative offer and diversity of pitches available is welcomed. It is noted that the 5 year supply figure of 5/6 pitches relates to a residual figure (for the Plan period 2011 -2031), rather than the immediate 5 year period (2017-22) identified in the GTAA. It is understood that Herefordshire Council have applied their own calculation of need in order to take into account residual requirements from the start of the Plan period (2011). However, it is not clear from the explanation set out in the DPD how the 5 year supply requirement, which differs from the gross figure for 5 year pitch need identified in the GTAA, is derived and it may be helpful to have more detail in this respect to aid general understanding of the approach. It should be noted that this is different to the situation in Shropshire where the GTAA base date and Plan review period are aligned at 2016 and the role of turnover has been previously accepted at Plan Examination.

#### ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
   **GTAA**                      **1002**                      **2017**

Name  Steve Davis

Organisation:

RepresentationType:  Support

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
   **GTAA**                      **1022**                      **2088**

Name  Giles Boardman

Organisation:

RepresentationType:  Support

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

Yes

SoundnessReasons

Positively prepared

ChangesNecessary

Paragraph	Policy	Id	Representation
	<b>GTAA</b>	<b>1015</b>	<b>2072</b>

Name  Luke Clements

Organisation:

RepresentationType:  Objection

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

SoundnessReasons

I have set out my concerns in my earlier responses

ChangesNecessary

I have set out my concerns in my earlier responses

Paragraph	Policy	Id	Representation
	<b>GTAA</b>	<b>1039</b>	<b>2143</b>

Name  Jane Talbot

Organisation:

RepresentationType:  Objection

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

SoundnessReasons

As before

ChangesNecessary

I object to the scheme of proposed traveler's sites.

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
   **GTAA**                      **1001**                      **2008**

Name  Ryan Norman

Organisation:  Welsh Water

RepresentationType:  Support

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

ChangesNecessary

**Paragraph**                      **Policy**                      **Id**                      **Representation**  
   **GTAA**                      **1014**                      **2063**

Name  A  Cooke

Organisation:

RepresentationType:  Objection

isPositivelyPrepared    isJustified    isEffective    isConsistentNP    isLegallyCompliant

SoundnessReasons

In using the evidence from the GTAA, Gypsy and Traveller Accommodation Assessment stating that there is a requirement for different types of pitches. I understand this, however over the years we have seen the permanent sites at Red Hill in Hereford and Madley close. Plus the Pembridge site has been closed and refurbished many times. It seems that Herefordshire Council have contributed to this need.

ChangesNecessary

Paragraph	Policy	Id	Representation
	<b>GTAA</b>	<b>1005</b>	<b>2041</b>

Name

Organisation:

RepresentationType:

isPositivelyPrepared isJustified isEffective isConsistentNP isLegallyCompliant

#### SoundnessReasons

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.

Conclusion: 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 (1005)

ChangesNecessary

Paragraph	Policy	Id	Representation
	GTAA	1026	2114
Name	<input type="text" value="B Straker"/>		
Organisation:	<input type="text"/>		
RepresentationType:	<input type="text" value="Support"/>		
isPositivelyPrepared	isJustified	isEffective	isConsistentNP
	isLegallyCompliant	Yes	
SoundnessReasons	I am concerned by a very low assessment of accommodation need. However, I would not want to see the process hindered by re-assessment at this stage.		
ChangesNecessary			