# <u>Summary of responses received on Traveller Sites Development Plan</u> Document - Preferred Options consultation July 25<sup>th</sup> to 19<sup>th</sup> September 2016

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

Yes 30

No 50

#### Not sure 33

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

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

Yes 28

No 60

Not sure 23

- The majority of respondents answered 'no' (60) that they did not agree with the need to find 18 pitches arising from families living in houses.
- Of those who explained their reasons for answering 'no' in relation to overall provision, 41 believed the figure was too high and 8 considered the figure too low.

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

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

Yes 62

No 50

- The majority of respondents were in favour of temporary facilities provision. Those who answered 'yes' believed that it assists those who are passing through the area therefore preventing encampments in unauthorised locations such as council car parks and open space.
- Without the provision of a transit site or temporary stopping place the police have no legal power to remove travellers from unauthorised encampments other than via the S69 of the Criminal Justice and Public Order Act which is only invoked in aggravated trespass circumstances.
- Provision of a transit site/ temporary stopping places would enable the police to legally direct an authorised encampment to other preferred location. This will reduce community tension and financial burdens on landowners, policy monitoring, associated crime, loss of trade and clean-up costs.
- The majority who answered no were concerned about the management and policing of the temporary sites.
- Those who answered 'no' were also against such provision because of past experiences following encampments.
- Some respondents mentioned a lack of respect for settled people because of the attitudes of some Travellers and their treatment of sites and local people.
- Those against temporary provision believe that if Travellers choose this way of life then it should be their responsibility to pay for such sites as well as clean-up costs as Council budgets are very stretched with bigger priorities.
- The majority of respondents believe that Travellers do not pay any contribution towards temporary stop sites.

• May be an increased demand for temporary agricultural workers as a result of Brexit.

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

Yes 65

No 43

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

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

Yes 13

No 87

- Although 13 respondents answered yes, there were only two general areas suggested:
  - Bringsty Common no specific area identified
  - Council car parks

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

Yes 24

No 80

Not sure 2

Commercial caravan/camping parks could be used by travellers at commercial rates

- Several areas should be identified to give local resident tax payers a choice, this way the decision is not forced on people.
- This should not be the duty of councils and local tax payers
- Travelling Show people are capable of finding their own sites and have existing adequate provision.
- Travellers should pay for their accommodation.
- Differentiate between Travellers and Travelling Show People.
- A number of suitable sites can effectively accommodate both travellers and travelling show people.
- If there is no additional demand over what is already provided, there is no need for extra plots.
- A need in the South West (of the County).
- Travelling show people usually stay on the site of the show. When the show has
  finished they move on. During the 'off' season people usually return to their point of
  origin.
- Travelling Show People find it very difficult to find suitable sites.
- Travelling Show people numbers are declining.
- No specific research has been done to suggest a need.
- Sites are dumping grounds causing rat infestation.
- The Show people sites in Ross should be checked to see if any land is available in that part of town.
- It is the Council's duty as this is a very hard land use to meet and it is very difficult for show people to find sites. If the need is low that is no reason to ignore. That is a self-perpetuating situation. There is a suppressed need for more pitches across the country and probably in Hereford and strongly suspect many have been forced to relocate to where there are pitches. Aware of huge problems in Gloucester/ Tewkesbury for show persons finding sites (e.g. Gotherington group). This should be addressed. Many live in overcrowded conditions and need the Council to help improve their situation rather than ignore it. Show Persons deserve better than this.

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

Yes 7

No 85

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

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

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

Yes 35 No 49

- Broadmeadow appears to be in an industrial estate and is therefore unsuitable for families
- Concern about proximity to nearby caravan park. May cause confusion and illegal encampments on the caravan site.
- Concern that will discourage tourists affecting town's economy.
- Inadequate size for the number of Travellers that come to Ross judging from recent experiences in 2016.
- Showpeople may own alternative sites that could be used
- Risk of litter in the culvert may cause flooding
- Not a suitable site if horses are involved.
- A temporary stopping place in the town centre is unsuitable for Travellers. A better site is located away from other uses in a more isolated location. Stopping place better along a primary road network or main route of travel.
- Consider nearby heritage assets

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

Yes 50

No 31

### Additional petition with 94 signatures against the site from local businesses

- A busy area, with lots of traffic. Not safe for children.
- Might be better as a site for storage of showground equipment
- Site subject to flooding
- Good location on the strategic highway network. Good access to a range of services and facilities. Travellers already use the general area.
- Concerned about the site becoming a permanent site instead of its intended temporary use.
- Will not be possible to address flood issues through SUDS and in winter conditions would be unacceptable for residents.
- Concerns over access in proximity to the A49.

- Large gas and water main under site with associated easement which would preclude development.
- Better alternative would be to consider use of laybys close to this site which would provide a better, safer environment for occupants and provide better value for money
- Noise and pollution issues so close to a main road
- Historic Lammas meadows nearby.
- Risk of contamination to River Lugg (SSSI)
- Gateway site into Leominster, not good for tourism
- Too close to the industrial estate which would deter businesses locating there
- The site proposal is not in accordance with paragraph 58 of the NPPF where safe environments preventing crime should be promoted. It is unlikely that the design of the proposed site could promote community safety and/or social cohesion.
- Concern over environmental impact on river and escalation of current theft/poaching issues
- Consider nearby heritage assets
- Good location on the strategic highway network. Good access to a range of services and facilities. Travellers already use the general area.
- Any traveller site is deemed the same as any residential development next to the
  operational railway should the Council choose to develop a site next to the operational
  railway they must provide a suitable trespass proof steel palisade fence of a minimum
  1.8m in height to mitigate any risks that the development might import.
- Inadequate consultation.
- Sensitive green belt site in the wrong location and difficult to control increases in the number of caravans in the future.
- Concern over flood risk, increase in insurance premiums, property value decrease, management of site and personal safety
- The abuse and disrespect for the site is still an issue.

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

Yes 6

No 83

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

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

Yes 43

#### No 34

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

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

Yes 52

#### No 24

• Extending an existing site seems a more cost effective solution

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

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

Yes 30

No 60

- The location of the site will encourage unsustainable car travel to the village and to access other facilities in Hereford.
- Unsafe routes to school along the Ridgeway and school lacks capacity for new pupils.
- The Rhea is affected by flooding from the river Lugg which would rule out access to the village from the southern part of the site. It is unlit and therefore would restrict use after dark.
- Significant harm to the character and appearance of the surrounding landscape with an urbanising impact.
- Contrary to national, county and local neighbourhood plan policies.
- Any planting screening could compromise the landscape character.
- Impact on local residents.
- The proposal cannot be justified as an' exception' as this can only be applied to planning applications.
- Loss of greenfield land which is not an effective use of land.
- The site lies within a minerals safeguarding area
- An isolated site outside in the countryside not in line with policy

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

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

Yes 54

No 30

- Extending a site that already exists would be more cost effective
- Extension to the site should considered on the north east instead of along the road
- Travellers dislike the site because of its location and poor state. Extending it would not improve it but create further problems
- Unsafe for children
- Already a local authority owned and managed site. Extension to the south could share existing access. Site served by public bus service.

- The current plots are empty which leaves to questions of need in the rural location
- There is no additional facilities are no additional facilities for families and it is a dangerous place for children who tend to spend a lot of time outside.
- It would affect tourism
- Consider nearby heritage assets

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

#### Yes 54

#### No 25

- Established sites would cost less and seem an obvious solution
- Local authority owned and managed sites .Efficient use of land.
- Minimal landscape impact as within existing boundaries of existing site. Good road access
- Site should have no more than 5 plots for better management of anti-social behaviour
- The site requires better management otherwise it should not be extended.
- The site has had 8 new pitches recently and needs time to bed in before expansion
- There continues to be significant issues with unlicensed vehicles, fly tipping, unlicensed waste transportation and obstruction of the estate road.
- Question how would improvements be funded
- Consider nearby heritage assets

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

#### Yes 58

#### No 20

- Romany close is extremely cramped. This site would work well as a transit site only
- Local authority owned and managed sites.
- Efficient use of land. Minimal landscape impact as within existing boundaries of existing site.
- Good road access.
- Away from major housing areas
- Concern about expansion and Traveller community cohesion
- Consider nearby heritage assets

 Question whether there should be two extra pitches on the existing site to minimise the risk of unauthorised settlements.

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

Yes 7

86

No

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

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

Yes 37

No 49

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

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

Yes 45

No 33

- Unfair that taxpayers will be paying for this accommodation
- Discourage the Traveller lifestyle and there is no need for permanent sites
- The Core Strategy policy is adequate on design and paragraph 11.2 only repeats the PPTS requirements
- Careful design will help to minimise the impact
- Sites in the AONB should have specific reference to no adverse impacts in the AONB.
- H4 provides sufficient design guidance no additional guidance is required.

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

Yes 24

No 50

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

• The layout of sites and design of buildings is crucial in minimising impact on local surroundings. Sites should be developed using design criteria which could be spelt out in detailed guidance to assist in making planning applications.

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

Yes 16

No 57

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

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

Yes 5

No 68

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

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

Yes 24

63

No

- Make the information on the consultation more accessible
- Council funds are stretched enough without having to fund Traveller sites
- Consider areas along the Hereford relief road for potential sites
- Mistrust of Travellers due to previous negative experiences with theft and littering
- Should not have ruled out Mid-Summer Orchard Ridgehill without considering a different layout which could have addressed the visual impact
- Maps on the website are difficult to read
- Focus on enlarging existing sites and not creating new ones
- Concern about agricultural pollution or proximity of livestock on residents of traveller sites
- Having a large site would be easier to plan for rather than a number of smaller sites
- The Old Grafton Depot on the A49 South of Hereford Land adjacent to the M50 opposite Ross Golf Club
- The number of sites proposed is inadequate
- Possibly with a little ingenuity, planning and acquiring of modest amounts of adjoining land they could be made ideal for use as temporary, if not permanent sites
- Should consult specifically with Travellers
- Traveller sites are better situated close to the urban areas due to the proximity of facilities. Priority of services and costs to rate payers to be considered.
- The council's proposed site design policy is appropriate in seeking to protect privacy and residential amenity for neighbouring land uses.
- Support the Councils intended county wide plan led approach to identifying traveller sites, so that these sites can be appropriately assessed at a strategic level.
- It is concerning that the distribution of sites is predominantly in the south of the county
- Any new travellers' sites that may fall within the AONB, including the travellers' windfall sites, respect the status of this designated area. Any such applications within the AONB should be granted only if there are no adverse impacts on the landscape character and other special qualities of the AONB, including tranquillity. The proposals should be consulted with the AONB Unit and considered in accordance with the Malvern Hills AONB Management Plan 2014-19, Landscape Strategy and Guidelines, Guidance on Building Design and other associated guidance.
- No information given about the cost of site provision.

- Concern about the relationship between Traveller DPD and NDPs
- Proportional to housing for general occupation each traveller household takes up more space.
- There should be some recognition of competition for resources and indication of alternative strategies for meeting actual need e.g. use of emergency housing.
- There seems to be an imbalance in the distribution of sites and more may need to be provided in the south of the county.
- Need to ensure appropriate provision for disabled/older travellers.