Dear Lynette Benton,

**Planning Policy for Traveller Sites**

Thank you for your letter of 21st May in which our Inspector has asked for our comments (South Downs National park Authority and Wealden District Council) on the implications for the joint submitted Core Strategy in respect of the above aspects of national policy.

The Inspector has highlighted in his letter to us Policy B (Para 9) of the new national policy and specifically that “in producing their Local Plans Authorities should identify a (5 yr) supply of deliverable sites. Whilst we have not in our Core Strategy, because we were in no position to do so, been able to show a 5yr deliverable supply set against locally derived targets we consider that our criteria based Policy can be used to meet these shorter term needs and that development of a sites allocations DPD will meet them in the medium to longer term. This subsequent DPD will show that supply of deliverable sites and, as part of our Local Plan, will therefore meet the new requirement of the national policy. Paragraph 7.18 of our submitted Core Strategy confirms this approach.

In responding to the Inspector’s request we also have set out our detailed comments in respect of the CLG document “Planning policy for traveller sites” which came into effect on the 27th March 2012.

Within this document the Government’s stated aim in relation to planning for traveller sites is:

“to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic life of travellers whilst respecting the interests of the settled community”

For ease of reference we have set out our detailed response by cross referring to the specific policies that appear in this document.
Policy A: Use of evidence to plan positively and manage development

Our Core Strategy has used evidence from a joint / countywide gypsy and traveller accommodation assessment (GTAA) to inform our plan. This work was subsequently validated and further refined following input from the Pat Niner studies at Warwick University who are acknowledged specialist advisors in respect of provision for gypsy and travellers. We were subsequently invited and also offered our comments to the panel of Inspectors appointed to look at the partial review of the South East Plan in respect of gypsy and traveller issues. The panel also invited views from the gypsy and traveller community.

Our Core Strategy has also incorporated the very latest evidence of needs arising from that partially completed review (panel’s conclusions) in seeking to accommodate the slightly increased numbers of need identified for Wealden District, incorporating part of the South Downs National Park. The submission Core Strategy therefore identifies and positively plans to provide a further 23 pitches to meet the identified needs over the period 2006-2016. We confirm, at paragraph 7.18 of the Core Strategy, that this will be done through our sites allocations DPD. We also confirm in seeking to plan positively to meet future needs that a partial review of the Strategy and a further GTAA will be required to inform needs beyond 2016. In this respect one of the Inspectors proposed main modifications following conclusion of the substantive hearing sessions of our core strategy is confirming the need for a review in 2015. This is when we envisage such work taking place, namely as part of that review and through an updated GTAA and a look at identified needs beyond 2016.

Policy B: Planning for Traveller Sites (pars 7-11)

We set out at Policy WCS10 of the core strategy what we expect the local plan will deliver and have conducted our GTAA on a countywide basis (and indeed accepted the slightly increased figures of need arising from the partial review). We have explained in Policy WCS11 how we will identify and assess suitable sites and the consideration of planning applications. This includes a criteria based approach – again developed countywide and following consultation with representatives of the gypsy and traveller community. This identifies how these criteria will guide land supply allocations, ensure sustainable sites, and how these should relate to areas of designated landscape and existing residential settlements.

Policy C: sites in rural areas and the countryside (para 12)

Our proposed submitted Policy (WCS11) criterion/bullet points 3 and 4 address this requirement of Policy C.

Policy D: Rural exception sites (para 13)

This is a new area of Policy advice from CLG but can be addressed through the sites allocations DPD with regard to looking at provision for gypsies and travellers.

Policy E: Traveller Sites in Green belt (paras 14-15)

There is no designated Green Belt land within the area of our Core Strategy.

Policy F: Mixed planning use Traveller Sites (paras 16-18)

Mixed use sites are not precluded from policy WCS11 and will also be considered as part of the Sites Allocations DPD process. It is noted that the government’s policy is that mixed use should not be permitted on rural exceptions sites.
Policy G: Major development projects (para 19)

We do not have any major development proposal within the Core strategy which requires the relocation of a traveller site.

Regarding the queries posed in the Inspector’s letter we have set down clear reference to needs, the mechanism (sites allocations DPD and criteria based Policies) for meeting those needs – either through site allocations or through assessment of proposals received. These criteria and methodology were developed following widespread consultation including specifically with representatives of the gypsy and traveller community. Our supply of deliverable sites is therefore set out as being part of our Local Plan process.

We acknowledge in the submission Core strategy that a further needs assessment will be needed to review needs beyond 2016 and consider that this forms a legitimate part of the Inspector’s proposed review of the strategy in 2015. In the interim and as encouraged to do so by Government we have been prioritising production of the Core Strategy and Strategic Sites DPD. Neither of these DPDs would be appropriate for allocating small sites for traveller sites however our Policy WCS10 and policy WCS11 indicate how we will assess proposals that come forward in the interim.

The sites allocations document will seek to do positively plan for years 6-10 of the strategy and beyond if that should prove possible. This DPD is due for examination in 2014 and will further help meet the aim of the NPPF (paragraph 4) in planning for sites over a reasonable timescale. As the NPPF was published post submission of our Strategy the new requirement of LPA’s and enshrined in that document to show a supply of deliverable sites to meet a 5 year supply assessed against locally set targets was neither feasible or indeed able to be forecast as any requirement of the LPAs. Our adopted methodology and criteria will however enable needs to be met where sites coming forward are consistent with those policies and pending preparation of the sites allocations document.

The acknowledged need for an additional 23 pitches to 2016 would amount to a numerically modest target annually (c 3 pitches) which it is considered can be met with sites coming forward through the application process and where there is, within the core strategy, clear guidance on positive criteria to lead to a successful application.

We would therefore conclude that the joint Core Strategy is in general, conformity with the NPPF as it relates to the positive planning for gypsy and traveller sites. Our strategy has been developed and the policies in contains are in accordance with this advice, including through consultation with gypsy and traveller representatives and via production of subsequent DPDs.

Yours sincerely,

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