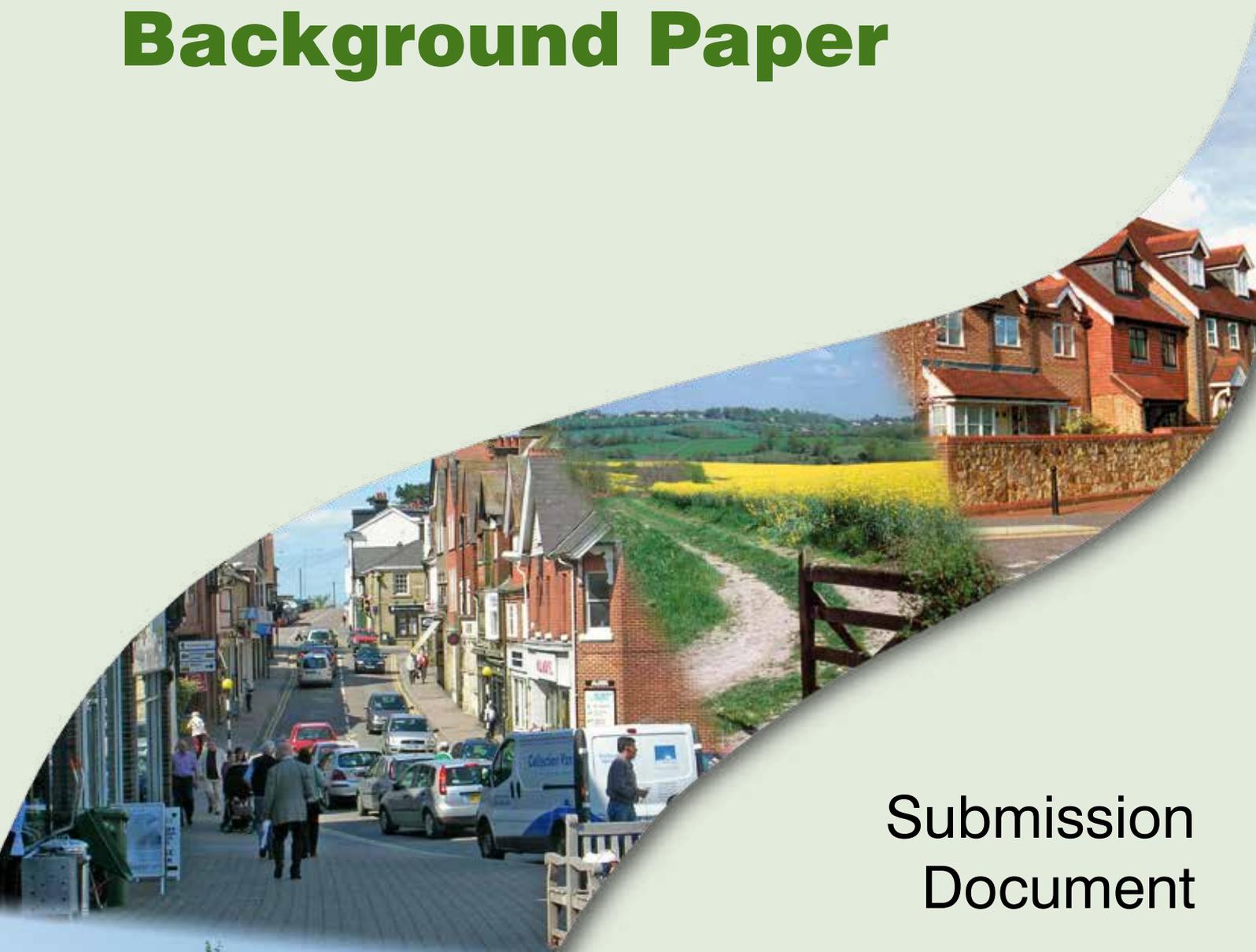
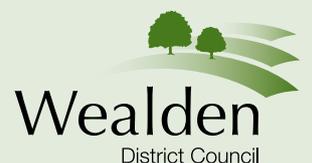


Wealden Local Plan

Gypsy and Travellers Background Paper



Submission
Document



January 2019

How to Contact Us

Planning Policy

Wealden District Council

Council Offices, Vicarage Lane, Hailsham, East Sussex BN27 2AX

Telephone 01892 602008

E-mail: ldf@wealden.gov.uk

Website: www.wealden.gov.uk

Office hours Monday, Tuesday, Thursday, Friday 8.30am to 5.00pm and Wednesday 9.00am to 5.00pm

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Contents

1 Background

1.1 The Council has prepared a series of Background Papers to accompany the Wealden Local Plan. The papers cover a range of issues and provide technical and detailed information, derived from a number of our specialist studies, or summaries of relevant work undertaken which inform the strategy and policies of the Wealden Local Plan.

1.2 This Background Paper provides information on how relevant policy, guidance and evidence have been used to inform the Wealden Local Plan's objectives and policies in relation to provision for Gypsies and Travellers and Travelling Showpeople. This Background Paper examines the issues and responsibilities relating to planning for the accommodation needs of Gypsies and Travellers and Travelling Showpeople. This includes, in particular, determining the appropriate number of Gypsy and Traveller pitches and plots for Travelling Showpeople and how we plan to meet this. This Background Paper also examines how we have identified appropriate sites to meet the identified need.

1.3 The format of this Background Paper is set out as follows:

- Section 3 sets out in detail the national and local context for providing accommodation for Gypsy and Traveller site provision, which includes the definitions of who constitutes a Gypsy, Traveller or Travelling Showperson;
- Section 4 outlines the studies that have been undertaken to assess the needs within the District for Gypsy, Travellers and Travelling Showpeople;
- Section 5 sets out the results of the studies in relation to Travelling Showpeople;
- Section 6 sets out the results in relation to Gypsy and Travellers; and
- Sections 7 and 8 set out the background to the policy development for the Wealden Local Plan including the outcome of the Issues, Options and Recommendations Consultation, the proposed policy and preferred locations for the provision for Gypsy and Traveller Accommodation in the Submission Wealden Local Plan.

1 Background

2 Introduction

2.1 The Council has a statutory duty to plan for the housing needs of all its residents within the District, which includes the Gypsy, Traveller and the Travelling Showpeople community. In response to this requirement, the Council has made provisions to meet locally identified need in the plan making process.

2.2 The Council jointly commissioned a Gypsy and Traveller Accommodation Assessment (GTAA) which was published in January 2015. This GTAA identified the housing need for Gypsy, Traveller and Travelling Showpeople. In October 2015, the Council published the Wealden Local Plan Issues, Options and Recommendations Consultation paper which included options for policies relating to Gypsy, Traveller and Travelling Showpeople. These options related to housing provision options and housing location options. This document was subject to a six week consultation period between October 2015 and December 2015 supported by a Sustainability Appraisal (October 2015).

2.3 A further Gypsy and Traveller Accommodation Assessment (GTAA) was commissioned taking into account a revised definition of Gypsy and Travellers, which was published in November 2016. This provided a robust revised assessment of current and future needs for permanent Gypsy and Traveller accommodation in Wealden for the period 2016-2038. This evidence together with the consultation responses from the Issues, Options and Recommendations consultation and an assessment of land availability have been used to inform the Wealden Local Plan.

2 Introduction

3 Policy context

3.1 The Housing Act 2004⁽¹⁾ placed a duty on local authorities to produce assessments of accommodation need for Gypsies, Travellers and Travelling Showpeople (GTTS) and outlines how their needs can be met as part of the wider assessment of housing needs.

3.2 In March 2012, the Government published Planning Policy for Traveller Sites (PPTS)⁽²⁾ which sets out the primary guidance and requirements for local planning authorities on how to plan for Gypsies and Travellers. It is stated that the PPTS is to be read in conjunction with the National Planning Policy Framework (NPPF) which was also published in March 2012. The PPTS policy document has since been updated in August 2015, and the Government's overarching aim is stated in Paragraph 3: “...to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.”

3.3 To help achieve this, Paragraph 4 in the PPTS sets out a series of aims in respect of traveller sites:

- *Local planning authorities should make their own assessment of need for the purposes of planning*
- *To ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites*
- *To encourage local planning authorities to plan for sites over a reasonable timescale.*
- *That plan-making and decision-taking should protect Green Belt from inappropriate development*
- *To promote more private Traveller site provision while recognising that there will always be those Travellers who cannot provide their own sites*
- *That plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective*
- *For local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies*
- *To increase the number of Traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply*
- *To reduce tensions between settled and Traveller communities in plan-making and planning decisions*
- *To enable provision of suitable accommodation from which Travellers can access education, health, welfare and employment infrastructure*
- *For local planning authorities to have due regard to the protection of local amenity and local environment*

3.4 In practice, Paragraph 9 in the PPTS states that:

“Local planning authorities should set pitch targets for Gypsies and Travellers...and plot targets for Travelling Showpeople...which address the likely permanent and

1 <https://www.legislation.gov.uk/ukpga/2004/34/section/225>

2 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/457420/Final_planning_and_travellers_policy.pdf

transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities”

3.5 In addition, Paragraph 10 in the PPTS goes on to state that in producing their Local Plan, local planning authorities should:

- *Identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years’ worth of sites against their locally set targets*
- *Identify a supply of specific, developable sites, or broad locations for growth, for years 6-10 and, where possible, for years 11-15*
- *Consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a duty to cooperate on planning issues that cross administrative boundaries)*
- *Relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population’s size and density*
- *Protect local amenity and environment*

3.6 However, where there is no identified need for Gypsy and Traveller sites, Paragraph 11 in the PPTS notes that: *“criteria-based policies should be included to provide a basis for decisions in case applications nevertheless come forward. Criteria-based policies should be fair and should facilitate the traditional and nomadic life of Travellers, while respecting the interests of the settled community”*

3.7 The current ‘planning’ definition for a Gypsy, Traveller or Travelling Showperson is set out in Annex 1 of the PPTS and WDC has therefore used these definitions for the purposes of this document.

‘Gypsy and Traveller’ means: Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependants’ educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

In determining whether persons are “gypsies and travellers” for the purposes of this planning policy, consideration should be given to the following issues amongst other relevant matters:

- a. *whether they previously led a nomadic habit of life;*
- b. *the reasons for ceasing their nomadic habit of life; and*
- c. *whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.*

3.8 Travelling Showpeople are defined as Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes people who, on the grounds of their families or dependent’s more localised pattern of trading, educational or health needs or old age, have ceased to travel

temporarily, but excludes Gypsies and Travellers. Although their work is of a mobile nature, showpeople nevertheless require secure, permanent bases for the storage and repair of their equipment and to live when not on the road. In recent years many showpeople have had to leave traditional sites, which have been displaced by other forms of development. Many showpeople are members of the Showmen's Guild of Great Britain and are required by the Guild to follow a strict code of practice regulating the use of their sites. Membership of the Guild provides showpeople with exemption from the site licensing requirements of the Caravan Sites and Control of Development Act 1960 when they are travelling for the purpose of their business, or where they only occupy quarters for a period between the beginning of October and the following March. Annex 1 of the PPTS sets out the definition of Travelling Showpeople.

Travelling showpeople' means:

Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above.

3 Policy context

4 Studies Undertaken

4.1 In December 2013 South Downs National Park Authority in consultation with Brighton and Hove City Council and East Sussex Council's (Eastbourne, Hastings, Lewes, Rother and Wealden) commissioned consultants to produce an objective assessment of Gypsy, Traveller and Travelling Showpeople accommodation need for each authority for the period 2013/14 to 2027/28. The assessment analysed the need as at February 2014 and was published in January 2015.

4.2 This report was published prior to the publication of the national guidance published in August 2015 which amended the definition of which individuals and families should be categorised as being Gypsy and Travellers along with a list of issues that should be considered in making this categorisation in specific cases. After the publication of the new national guidance discussions took place with each authority subject to the 2015 study relating to progressing the study to include the new definitions and the impact this would have on future provision. It was agreed that Wealden District Council would progress this work independently from each other authority given the stage of each authority in their local plan making.

4.3 A Gypsy and Traveller Accommodation Assessment (GTAA) was subsequently published in November 2016 and provides an assessment of the current and future needs for permanent Gypsy and Traveller accommodation in Wealden. The study focusses on the number of additional pitches required between 2016 and 2038 to ensure the pitch demand for the District is met. A summary of the assessment is outlined in section 6 below.

4.4 In view of the conclusions outlined in the 2014 report in relation to Travelling Showpeople, the 2016 GTAA did not undertake additional work in relation to this group. The results of the 2014 report relating to Travelling Showpeople are outlined in section 5 below.

4 Studies Undertaken

5 Results on Travelling Showpeople

5.1 The 2016 Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment set out an overview of Travelling Showpeople in each authority area. The results for Wealden District are set out in the table below.

Table 1 Travelling Showpeople need

District	No. of yards	No. of plots	Name of yard	No. changed over last 5 years	Anticipated increase over the next 5 years
Wealden	1	6	Gracelands	No	No

5.2 The pitch at Gracelands is the only Travelling Showpeople yard in Wealden. This yard is long established, with planning consent recorded at 1976 and extended in 1990. Consultation with the Showman's Guild of Great Britain indicated that they were not aware of accommodation need in the study area and that the two counties with the most need in the South East are Essex and Kent. The report confirmed that given the small number of Travelling Showpeople in the study area there is a nil need for additional yard based accommodation from Travelling Showpeople households in the District.

5.3 Based on these results, it was considered that further work was not required to assess future need in the District and that there is no requirement in the Local Plan to allocate sites for Travelling Showpeople. However a criteria based policy has been included in the Wealden Local Plan in order to satisfy any need if it arises in the short term in accordance with the PPTS. This is outlined in section 6 below.

5 Results on Travelling Showpeople

6 Results on Gypsy and Travellers

6.1 A summary of the results of the Gypsy and Traveller Accommodation Assessment (GTAA) November 2017 report is outlined below.

Current Pitch Provision

6.2 With regard to permanent Gypsy and Traveller sites in Wealden, the GTAA identified there are currently 3 public sites with a total of 25 pitches as set out in Table 2 below.

Table 2 Existing Pitch Provision in Wealden District

Category	Sites/ Yards	Pitches/Plots
Public Sites (Council)	3	25
Private Sites (with permanent planning permission)	11	23
Private Sites (with temporary planning permission)	2	2
Unauthorised Sites (without planning permission)	2	2
Public Sites (Council)	Pitches/Plots	
Bridge Caravan Park - Uckfield	10	
Polly Arch Caravan Site - Polegate	6	
Swan Barn Caravan Site - Hailsham	9	
Private Sites (with permanent planning permission)		
Fir Tree View - Halland	2	
Five Badgers - Hadlow Down	2	
Greenhedges - Mark Cross	4	
Little Arce - Mark Cross	1	
Little Oaks - Mayfield	5	
Milton Field - Polegate	2	
The Plot - Five Ashes	3	
The Stables - Frant	1	
The Triangle - Crowborough	1	
Water Treatment Works - Buxted	1	

Whitegates - Hailsham	1
Private Sites (with temporary planning permission)	
Leelands - Wadhurst	1
Little Rose - Cross in Hand	1
Unauthorised Sites (without planning permission)	
Land Adjacent to Five Badgers	1
The Chalet - Cowden	1

Current Need

6.3 As part of the assessment, household surveys were undertaken to ascertain the current pitch demand in the District using the Gypsy and Traveller definition as revised in the Planning Policy for Traveller Sites (PPTS). Surveys were undertaken with Gypsies and Travellers living on public, private, temporary and unauthorised sites in addition to those residing in bricks and mortar⁽³⁾. In total, 35 site based households were contactable during the survey period and 6 out of 99 households living in bricks and mortar were available. From this, it was concluded that 15 existing households living on site meet the revised PPTS definition of a Gypsy and Traveller household, whilst only 4 living in bricks and mortar meet the revised definition, giving a total of 19 known Gypsy and Traveller households in the District.

6.4 Table 3 shows the number of Gypsies and Travellers in the District who meet and do not meet the revised definition of a Gypsy and Traveller by site type. The unknown column refers to Gypsies and Travellers who were not contactable during the survey period and as a result, it could not be ascertained whether these households meet the definition of Gypsies and Travellers. Therefore they could not be included in the future provision calculations as it was not felt appropriate to make assumptions on their accommodation needs.

Table 3 Number of Gypsies and Travellers in Wealden District who meet the revised definition of a Gypsy and Traveller, by site type

Site Type	Meets New Definition	Does Not Meet New Definition	Unknown
Public Sites	1	12	11
Private Sites	12	7	1
Temporary Sites	1	0	1
Unauthorised Sites	1	1	0

3 Bricks and mortar is defined in this assessment as mainstream housing

Bricks and Mortar	4	2	93
Total	19	22	106

6.5 Table 4 identifies the total current supply and need in the District.

Table 4 Total current supply and need of Gypsy and Traveller pitches

Supply of pitches	Pitches
Available vacant public and private pitches	1
Unimplemented pitches on new sites	0
Vacated by households moving to bricks and mortar	0
Out-migration	0
Total Current Supply	1
Current Need	Pitches
Households on unauthorised developments	1
Households on unauthorised encampments	0
Concealed households/doubling up/over crowding	2
Five year need from older teenage children	4
Movement from bricks and mortar	3
Households on waiting list for public sites	0
Total Current Needs	10

6.6 The total current need in the District is 10 Gypsy and Traveller pitches and the total current supply is 1 pitch. Therefore the **total current net need** for Gypsy and Traveller pitches in the District is **9 pitches**.

Net New Household Formation

6.7 The GTAA subsequently looked to forecast the total future pitch need. To do this the assessment used a household base number of 24 pitches, made up of:

- 15 occupied pitches (public, private, temporary and unauthorised);
- 3 households preferring to move from bricks and mortar to a pitch;
- 2 'doubled-up' households; and
- 4 teenage children in need of a pitch of their own in the next five years.

6.8 The assessment then looked to use a growth rate, or new household formation rate, which was 3% per annum nationally (based on earlier guidance) to extrapolate the pitch base number. However, this was assessed to be an unrealistic growth rate when compared to the growth rate of the settled community and when the age structure of the Gypsy and Traveller community was analysed. Taking this into account, the assessment concluded that a growth rate, or new household formation rate, of 1.75% was a more realistic figure to use.

Future Need

6.9 Extrapolation of the household base number of 24 pitches, using a growth rate of 1.75% per annum concluded that 11 new pitches would be needed over the GTAA period (2016-2038). Table 4 identifies the future need for Gypsy and Traveller pitches in the Wealden District.

Table 5 Total additional future pitches needed 2016-2038

Future Need	Pitches
Currently on sites with temporary planning permission	1
In-migration	0
Net new household formation	11
Total future need	12

6.10 The total future need for Gypsy and Traveller pitches in the District is **12 new pitches**, made up of 11 pitches due to net new household formation and 1 pitch which is currently on a site with temporary planning permission.

6.11 Consequently, adding the total current net need (9 pitches) to the total future need (12 pitches) gives a demand of **21 additional pitches** over the GTAA period (2016-2038). Table 6 below demonstrates how the additional pitch need for Gypsies and Travellers will be demanded over the GTAA period and is based upon the growth rate used for the extrapolation to assess the future pitch need.

Table 6 Additional need for 'travelling' households in Wealden District by five year periods

Years	0-5	6-10	11-15	16-20	21-22	
	2016 - 2021	2021 - 2026	2026 - 2031	2031 - 2036	2036 - 2038	Total
Number of pitches	12	2	3	3	1	21

6.12 The Gypsy and Traveller Accommodation Assessment identified the need for an additional 21 pitches within the Wealden District between 2016 and 2038. On an annualised

basis (using the local plan period between 2013 and 2038) the amount required is 18 pitches. If the GTAA methodology is used then this would result in the front loading of delivery as outlined in Table 7 below which shows that the delivery of one pitch would be earlier than required based on the local plan period.

Table 7 Additional Need for 'Travelling' Households in Wealden by 5 Year Periods

0-5	6-10	11-15	16-20	21-22	Total
2016-21	2021-26	2026-31	2031-36	2036-38	
12	3	3	2	1	21

6.13 Transit accommodation was assessed in the 2015 GTAA which identified only one transit site in study area at Bridies Tan, Lewes. In relation to Wealden District there was no identified need for transit sites/ unauthorised encampments between 2013/14 and 2017/18. Based on this evidence this type of allocation is not required in the Local Plan.

6 Results on Gypsy and Travellers

7 Gypsy and Traveller policy development

Wealden Local Plan Issues, Options and Recommendations consultation document – October 2015

7.1 The Wealden Local Plan Issues, Options and Recommendations consultation document was published for consultation for a period of six weeks between October 2015 and December 2015. This was the first stage of the preparation of the new Wealden Local Plan.

7.2 Section 10 of the document relates to Gypsy and Traveller housing provision within the District. The section outlines the identified need within the District which was set at an additional 53 pitches between 2013/14 and 2032/33. The Issues, Options and Recommendations document was published in October 2015, prior to the 2016 Gypsy and Traveller Accommodation Assessment taking place. Therefore the figures in the Issues, Options and Recommendations document were based upon a previous Gypsy and Traveller Accommodation Assessment (published January 2015) that did not incorporate the changes made to the PPTS in August 2015, particularly the definitions of Gypsies and Travellers. As a result, the number of pitches were an overestimate of need, taking into account changes in definition.

7.3 The Issues, Options and Recommendations document outlined two possible options with regard to the provision of Gypsy and Traveller housing which are set out below.

7.4 Option 11 – Gypsy and Traveller Housing Provision Options

1. *Seek to exceed the permanent pitch requirements for Gypsy and Travellers (i.e. allocate land which will be suitable for more than 53 pitches).*
2. *Seek to meet the permanent pitch requirements for Gypsy and Travellers (i.e. allocate land which will be suitable for 53 pitches).*
3. *Seek to locate a transit site within Wealden District.*
4. *Seek to locate an emergency stopping place within Wealden District.*

7.5 Option 11 is concerned with the type of pitch allocated and discusses the possibility of allocating each type of site. Points 1 and 2 both refer to permanent pitches. Point 1 seeks to exceed the allocation requirements whereas point 2 seeks to exactly meet the allocation requirements. Points 3 and 4 seek to allocate a transit site and an emergency stopping place within the District, respectively. However, it is noted that the GTAA did not identify a requirement for either of the site types outlined in points 3 and 4.

7.6 In addition to the number of pitches, options were put forward in relation to location of development in Option 12 – Gypsy and Traveller Housing Location Options. These options included:

1. *To retain the criteria contained within the Core Strategy.*

2. *To change the criteria within the Core Strategy.*
3. *To use the criteria within the Core Strategy to assess the suitability of sites.*
4. *To vary the criteria in the Core Strategy for transit or emergency stopping places, to allow flexibility regarding possibly removing the need to be within close proximity to settlements/ public transport.*
5. *To consider a requirement for sites to be provided for in future strategic development sites over a certain size.*
6. *To consider the impacts of allowing sites with temporary planning permission to be made permanent, allowing existing sites which currently don't have consent or extending existing sites."*

7.7 Option 12 relates to both the criteria contained within the Core Strategy⁽⁴⁾, as well as the site size and the status of the planning consent. Points 1-4 referred to the criteria contained within the Core Strategy and offered options to retain or change the criteria or use the criteria to make informed decisions. The criteria relating to Gypsies and Travellers within the 2013 Core Strategy reflects the National Gypsy and Traveller policies with regards to the positioning of sites close to local services, facilities and infrastructure and respecting the neighbouring settled community. Point 5 considered the option to require future strategic development sites over a certain size to include provisions for Gypsy and Traveller sites and point 6 put forward the concept of temporary planning permission permanent or using existing sites through either extension or regularisation.

7.8 The two options explore a number of pathways available and from these the Preferred Option for Testing was created. The Preferred Option for Testing contains a mixture of both Options 11 and 12. In addition, some options have been combined where appropriate.

7.9 Preferred Option for Testing 7 relates to Gypsy and Traveller housing provision and states:

1. *"To seek to meet at least the pitch provision requirement and consider any opportunities to exceed.*
2. *To retain the criteria contained within the Core Strategy.*
3. *To use the criteria within the Core Strategy to assess sites, but also consider opportunities to require provision on strategic development sites.*
4. *Consider the impacts of allowing sites with temporary planning permission to be made permanent, allowing existing sites which currently don't have consent or extending existing sites."*

4 Core Strategy Local Plan, Wealden District Council, adopted February 2013, page 63

7.10 The use of the criteria within the Core Strategy is also referred to in preferred option 3. This option looked to assess sites using the criteria within the Core Strategy in addition to seeking development opportunities on strategic development sites. Unlike point 5 of option 12, the preferred option for testing did not give a minimum size for the strategic site and it also did not enforce the provision requirement, rather it suggested it. Finally, the preferred option for testing sought to consider allowing existing Gypsy and Traveller sites with temporary planning permission to be granted permanent planning permission. In addition, it sought to consider using existing sites as a basis by either granting consent to those that do not currently have it or extending existing sites.

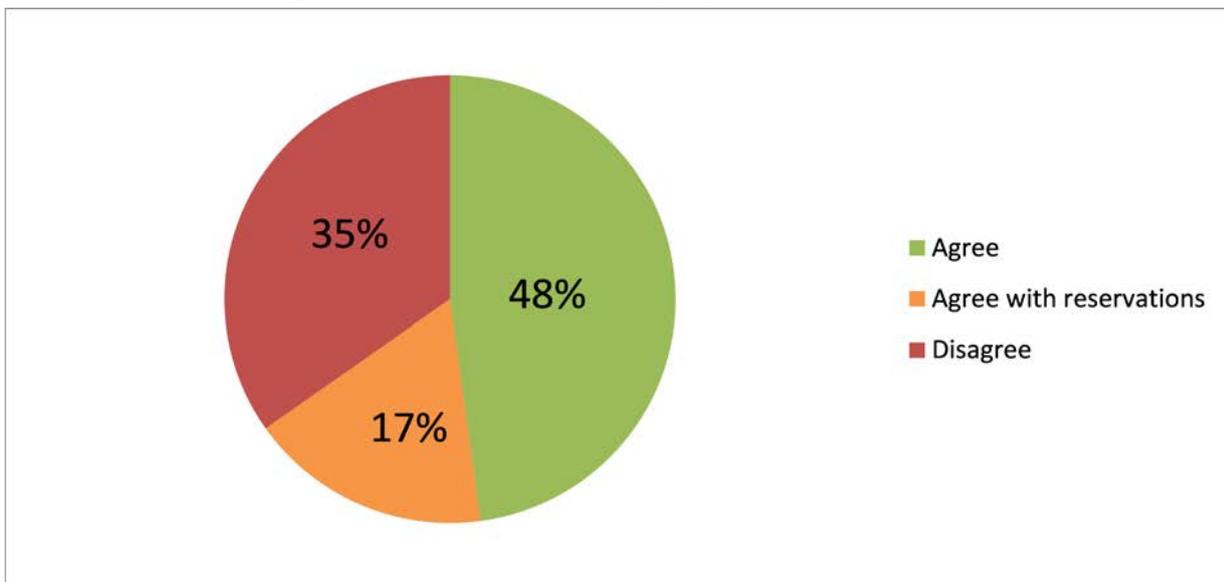
Consultation

7.11 Consultation on the Wealden District Council Issues, Options and Recommendations document began on 19th October 2015 and ran until 14th December 2015. Question six was in relation to the Gypsy and Traveller housing provision. It stated:

“Do you agree or disagree with the preferred option for testing for Gypsy and Traveller housing provision?”

7.12 23 responses were received in relation to this question. Figure 1 shows the proportion of people who gave each response type.

Figure 1: Graph representing the percentage of respondents who agree, agree with reservations or disagree with the consultation proposals

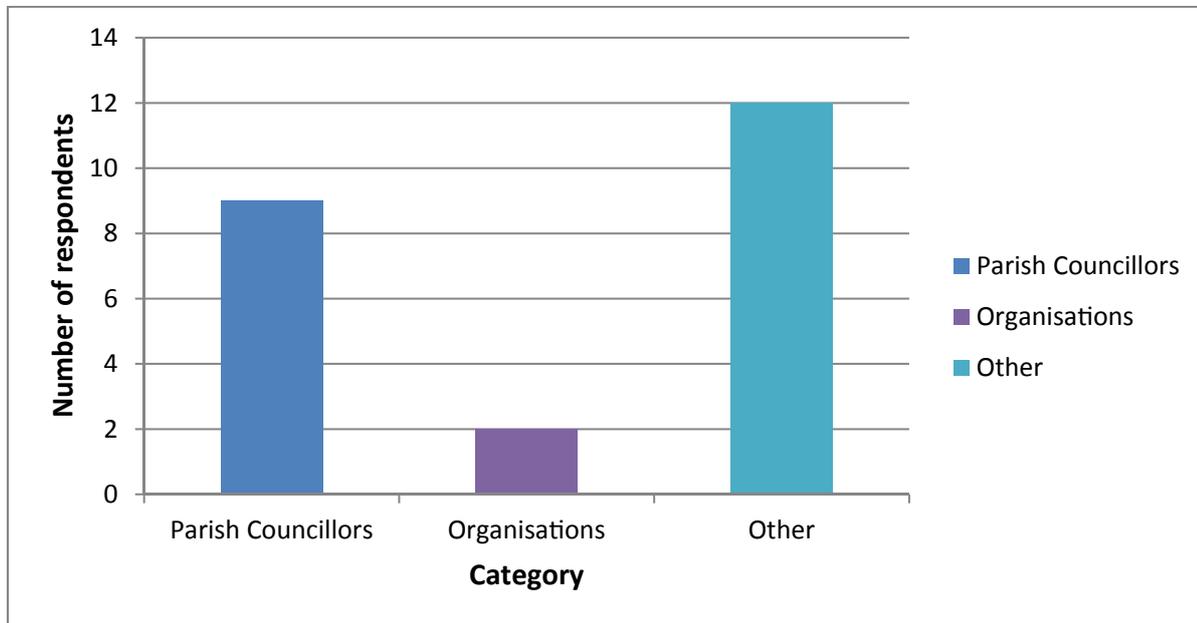


7.13 Of the responses, 11 (48%) agreed with Preferred Option for Testing 7, 4 (17%) agreed with reservations and 8 (35%) disagreed with it. Overall, 65% of respondents agreed, wholly or partially, with Preferred Option for Testing 7.

7.14 The responses to the consultation came from a variety of people including: District residents, Parish Councillors and company representatives. These respondents have

been split into three categories and Figure 2 shows the number of responses received from each category.

Figure 2: Number of responses from each category type



7.15 Of the responses, 9 (39%) came from Parish Councillors, 2 (9%) came from organisations and 12 (52%) came from others, including those who reside in the District.

Summary of Consultation Comments

7.16 The majority of comments received from the consultation were in relation to the four proposed strategies contained within Preferred Option for Testing 7.

7.17 The main concern raised regarding the first point in Preferred Option for Testing 7 was the lack of evidence for the additional pitch requirement. The first point seeks to at least meet the pitch provision requirement, which is set in Issue 8 of the Issues, Options and Recommendations at 53 additional pitches, but respondents felt that the evidence for this additional requirement was not made clear.

7.18 Some concerns were raised in relation to the second proposed strategy contained within Preferred Option for Testing 7. One respondent who disagreed with the proposals felt that they did not articulate how development for Gypsies and Travellers would have a positive impact on the area. Other respondents were concerned about the impact on the High Weald Area of Outstanding Natural Beauty (AONB) and the location of development in relation to flooding and infrastructure. All of these are referred to in the criteria regarding Gypsies and Travellers contained within the Core Strategy Local Plan.

7.19 Three concerns were voiced for the third proposed strategy in the preferred option for testing. All were in relation to the possibility of Gypsy and Traveller sites being located on strategic sites. Respondents felt that this would not be welcomed by housing developers due to financial issues, and that new Gypsy and Traveller development on strategic sites would be in close proximity to residents not from the Gypsy and Traveller community.

They suggested that this may be an issue due to the Gypsy and Traveller community having different needs to the settled community.

7.20 The fourth proposal in the preferred option for testing had the most concerns raised against it of all the proposals. Four respondents felt that allowing temporary planning permission to be made permanent was unfair as this would not be allowed for other developments and that if the temporary site was suitable for permanent occupation, permanent planning permission would have been granted initially.

8 Submission Wealden Local Plan

8.1 The Wealden Local Plan outlines the growth and change that will take place within Wealden District between 2013 and 2028, providing both Strategic and Local policies for development and change.

8.2 In order to identify potential sites for allocation for Gypsy, Traveller or Travelling Showpeople provision, the Council as part of its work on the Strategic Housing and Economic Land Availability Assessment (SHELAA) undertook a Call for Sites exercise in 2015. This included the option for sites to be submitted for Gypsy and Traveller use. No sites were submitted as part of this process or between the end of the Call for Sites period and the present time.

8.3 In developing the Local Plan consideration was made to allocating Gypsy and Traveller sites as part of larger housing and mixed use allocations within the Local Plan. Comments received during consultation indicated that in doing so, sites may become unviable and therefore undeliverable as a whole. In addition, there were concerns about a policy simply making temporary consents permanent.

8.4 As a result of the consultation and the absence of sites being brought forward in the SHELAA. The Council also examined its own land holdings as part of this process. Two possible sites were identified; Land at Station Road, Hailsham and Land at Lynholm Road, Polegate.

8.5 Paragraph 13 of the PPTS states that local planning authorities should ensure that sites should be sustainable economically, socially and environmentally. Policies should:

8.6 Paragraph 13 of the PPTS states that local planning authorities should ensure that sites should be sustainable economically, socially and environmentally. Policies should;

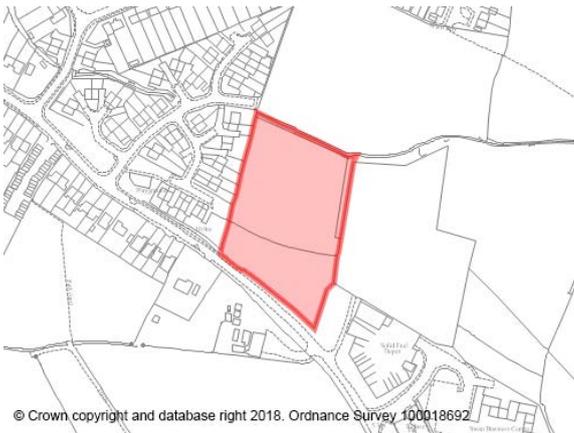
- a. *promote peaceful and integrated co-existence between the site and the local community;*
- b. *promote, in collaboration with commissioners of health services, access to appropriate health services;*
- c. *ensure that children can attend school on a regular basis;*
- d. *provide a settled base that reduces both the need for long-distance travelling and possible environmental damage caused by unauthorised encampment;*
- e. *provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well-being of any travellers that may locate there or on others as a result of new development;*
- f. *avoid placing undue pressure on local infrastructure and services;*

- g. do not locate sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans; and
- h. reflect the extent to which traditional lifestyles (whereby some travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability.

8.7 In addition when assessing the suitability of sites in rural or semi rural settings, paragraph 14 of the PPTS states that the scale of such sites does not dominate the nearest settled community.

8.8 Both identified sites were assessed against the criteria set out in paragraphs 13 and 14 of the PPTS which is set out in Table 8 and 9 below.

Table 8 Land at Station Road, Hailsham

<p>Site Map</p>	
<p>Site location and size</p>	<p>The site is located to the north of Station Road on the edge of residential development on the south eastern edge of Hailsham. The site is approximately 1.06 ha and consists of a small area of woodland and scrub.</p>
<p>Neighbouring Uses</p>	<p>The site is bordered by Station Road to the south and the housing of Butts Field to the west. A small waterway lined with mature trees (mostly oaks) runs along the north boundary of the site, beyond which is a similar area of shrub and woodland. To the east of the site the landscape has a more open character.</p>
<p>Proximity to services and facilities</p>	<p>Hailsham is classified as a 'Town' in the settlement hierarchy which is a district centre for the purposes of retail with good local facilities to meet the day to day needs of residents. It is therefore classed as a sustainable location. The site is approximately 1km from the centre of the Hailsham.</p>

Access	A new vehicular access would be required from Station Road. Station Road in this location changes from a 30mph speed limit to 60mph. Therefore, consideration would be required of the potential to extend the reduced speed limit or other traffic calming measures to enable a safe access to be created to the site. Pedestrian access to the site would also be required to be extended along Station Road as it currently ends at the south western edge of the site.
Environmental considerations	The area contains a mixture of semi-industrial usages, housing, young woodland and pasture, being connected to the surrounding countryside through a network of hedgerows. The site is almost completely enclosed with mature trees, woodland and shrubs on all boundaries. The central part of the western boundary, where the site backs on to the gardens in Butts Field, has fewer mature trees and therefore there are clear views into the central part of the site. The central part of the eastern boundary has fewer mature trees and gaps in the hedgerow allow views in from the adjacent site. The site has a coherent green infrastructure network comprised of hedgerows and belts of scrubby woodland, and also a watercourse which flows from Hailsham south-east towards the Pevensy Levels. These effectively link the site with the wider countryside despite a variety of local land uses including housing, a sewage treatment plant and various light industrial premises. The watercourse running adjacent and through the site on the northern boundary is an important feature within the landscape and contributes to the character and sense of place.
Compliance with para 13 and 14 of the PPTS	The site is located on the edge of the existing residential area of Hailsham therefore this will promote an integrated co-existence between the site and the local community. There are health and education facilities within Hailsham which will provide access to appropriate health services and enables regular school attendance (Primary and Secondary). The site can be accessed from Station Road which is a main arterial road through Hailsham. Allocating this site would not cause additional pressure on local infrastructure and services as this has been accounted for in the overall housing figures for Hailsham in the Local Plan through the Infrastructure Delivery Plan. The site is not located within the floodplain and development would not affect local environmental quality. The site is of sufficient size to provide several pitches, which would provide a settled base for residents that would in turn reduce the need for long distance travelling and possible environmental damage caused by unauthorised encampments. The site would enable residents to live and work from the same location which reflects traditional lifestyles and the site is not of such a scale which would dominate the nearest settlement (Hailsham).

Recommendation	Subject to satisfactory vehicular access being identified, the site is considered suitable for up to 18 pitches. The site is owned by Wealden District Council therefore it is a Council decision to deliver this level of pitches on the site.
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Table 9 Land at Lynholm Road, Polegate

Site Map	
Site location and size	The site is located to the rear of residential properties along Lynholm Road on the south eastern edge of Polegate. The site is approximately 0.18 ha and consists of a small area of scrubland.
Neighbouring Uses	The site borders residential development to the south-east of Polegate and is enclosed on three sides by high hedgerows and trees. An elevated railway track runs just south of the site. Adjacent residential development to the north is screened from view by a wooded edge, whilst the eastern edge of the site opens out into an area of open hardstanding that is used as a scrapyard. An existing Gypsy and Traveller site is located to the east of the site.
Proximity to services and facilities	Polegate is a town in the District which has good local facilities to meet the day to day needs of residents. It also has good transport links to the A22 and A27 and has a train station connecting the settlement to Eastbourne. It is therefore classed as a sustainable location. The site is approximately 2km from the centre of the Polegate and Polegate train station.
Access	There is an existing vehicular access from Lynholm Road under the railway bridge to the now disused water treatment works. Access would be required from this access road to the site.
Environmental considerations	The site is small and located adjacent to the existing development edge. If development came forward on this site it would be unlikely to result in significant landscape or visual effects, subject to it being of a suitable scale and design with appropriate landscape measures. Views are restricted in all directions by tall shrubs and tree scrubs, except towards the east where residential development is clearly visible, along with a restricted view of the wider landscape beyond. The area is secluded and has an urban-fringe character.

Compliance with para 13 and 14 of the PPTS	The site is located on the edge of the existing residential area of Polegate and this will therefore promote an integrated co-existence between the site and the local community. There are health and education facilities within Polegate which will provide access to appropriate health services and enables regular school attendance (primary and secondary). The site can be accessed from Lynholm Road which connects to Pevensey Road which runs through Polegate from east to west connecting to the A27. Allocating this site would not cause additional pressure on local infrastructure and services as this has been accounted for in the overall housing figures for Polegate in the Local Plan through the Infrastructure Delivery Plan. The site is not located within the floodplain and development would not affect local environmental quality. The site, although small, would provide a small number of pitches close to an existing Gypsy and Traveller site which would provide a settled base for residents, reducing the need for long distance travelling and possible environmental damage caused by unauthorised encampments. The site would enable residents to live and work from the same location which reflects traditional lifestyles and the site is not of such a scale which would dominate the nearest settlement (Polegate), even when considered in combination with the existing authorised site in this location
Recommendation	Subject to satisfactory vehicular access being identified the site is considered suitable for up to 3 pitches.

8.9 Table 6 above identifies between 2016 and 2031 18 additional permanent pitches are required in the District. To allow for flexibility to meet this requirement some 21 pitches have been allocated on the two sites identified in Tables 8 and 9 within the Wealden Local Plan to ensure that the requirement within the plan period is met and delivered. The allocation policies within the Wealden Local Plan are outlined below.

8.10 Policy SWGA24 – Allocation Hailsham South East 3C, Land at Station Road, Hailsham is allocated for the development of up to 18 Gypsy and Traveller pitches.

8.11 A planning application has been submitted by Wealden District Council for 18 pitches on this site (WD/2018/2384/DC) on 6th November 2018. The application proposes vehicular access from Station Road and an extension of the existing footway along the site frontage. ESCC Highways Authority have considered drafts of the planning proposal and have indicated that they have no adverse comments on the application and would seek conditions together with controls via a s278 Highway Act 1980 with regard to access construction and footway works together with a possible Traffic Regulation Order to extend the 30 mph beyond the site.

8.12 Policy SWGA38 – Allocation Polegate 2, Land at Lynholm Road, Polegate is allocated for development of up to 3 Gypsy and Traveller pitches.

8.13 In conformity with national policy the Council has included a criteria based policy for Gypsy and Traveller and Travelling Showpeople. Policy HG5 sets out criteria for determining applications relating to Gypsies, Travellers and Travelling Showpeople.

8.14 This policy is an adaptation of that contained within Policy WCS11 of the adopted Core Strategy which was subject to consideration by the appointed planning Inspector. As part of the examination proposed modifications were made by the inspector including amending the Gypsy and Traveller and Travelling Showpeople provision criteria to comply with national guidance regarding landscape and biodiversity protection and to clarify the position regarding impact upon residential amenity. These elements were included in the adopted policy.

8.15 However since the publication of the Core Strategy the policy has been changed to remove elements of the criteria as they are taken into account in other policies within the Wealden Local Plan. The following accounts for the changes have been made to the Core Strategy policy:

- Policy AF1 sets out that development identified within the plan may only be delivered when suitable mitigation measures for the Ashdown Forest Special Area of Conservation, Lewes Downs Special Area of Conservation and Pevensey Levels Special Area of Conservation and Ramsar Site are identified and a delivery mechanism created by the Local Planning Authority is in place in accordance with Policy AF2.
- Policy EA5 sets out the policy for protection of the High Weald Area of Outstanding Natural Beauty.
- Policy EA5 sets out the policy for the protection of the setting of the South Downs National Park.
- Policy NE4 sets out the policy for development within identified flood risk areas.

Policy HG1: The Travelling Community- Provision for Gypsies, Travellers and Travelling Showpeople

Proposals for new permanent sites for Gypsies, Travellers and for Travelling Showpeople will be supported where all of the following criteria are met:

- a. The need for provision within the District can be established;
- b. The site is well related to existing settlements identified within the settlement hierarchy. Sites should either be within or close to such settlements or close to major roads and/or public transport affording good access to local services;
- c. Safe and convenient vehicular access is demonstrated, be suitable in terms of landscape impact and be in a location where the necessary infrastructure already exists or can reasonably be provided;
- d. Achieve a reasonable level of visual and acoustic privacy;

- e. Will provide an acceptable level of amenity for the proposed residents and will not have an unacceptable level of impact on the residential amenity of neighbouring dwellings; and
- f. Avoids locations that are adjacent to incompatible uses such as a refuse tip, sewage treatment works or significantly contaminated land.

8.16 In the case of sites for Travelling Showpeople site suitability assessment will also take account of the nature and scale of the Showpeople's business in terms of the land required for storage and/or the exercising of animals. Proposals for extensions to existing sites will generally be supported subject to compliance with environmental and highway safety policies in this plan,

9 Conclusions

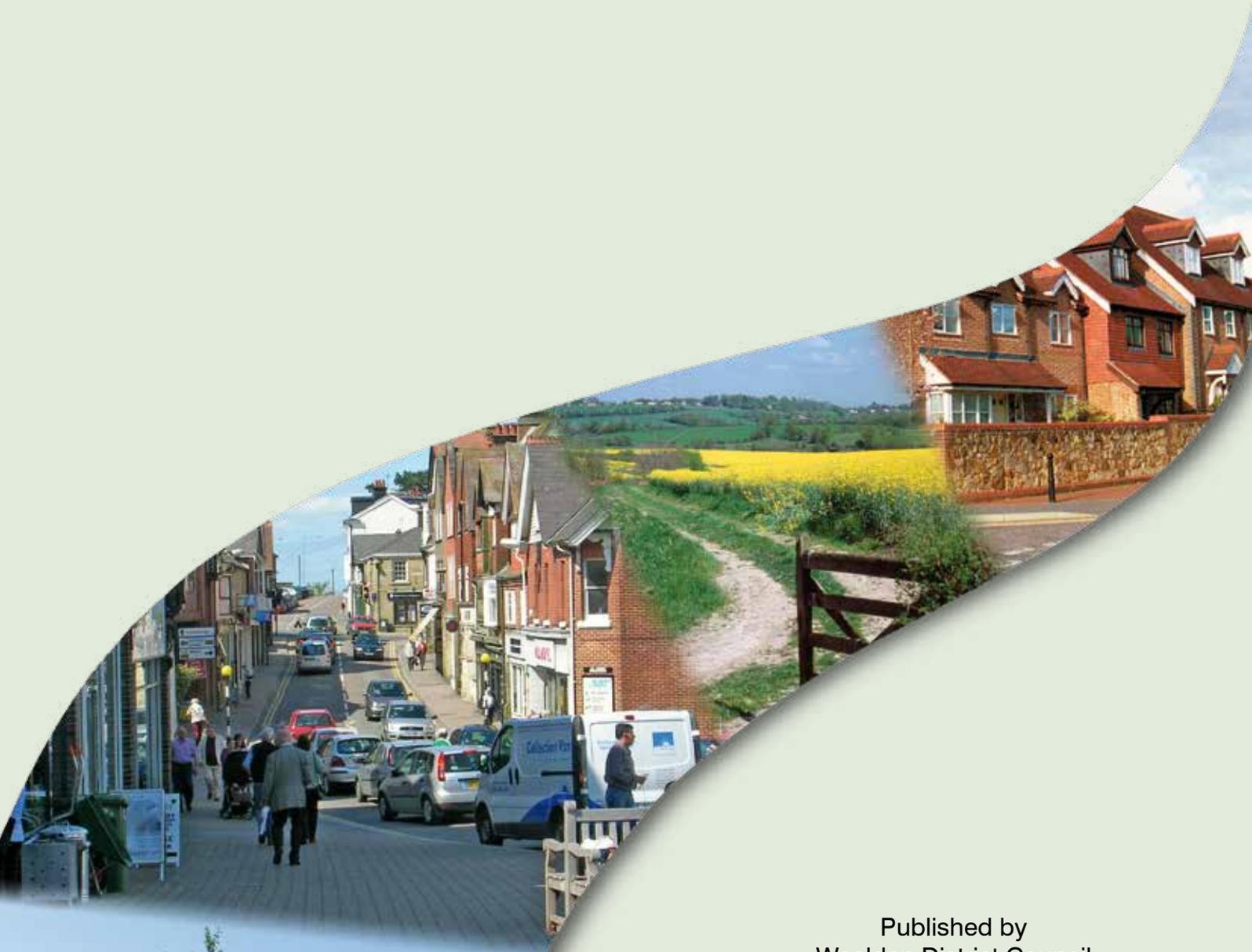
9.1 The evidence base comprises of a county wide study undertaken in 2015 with the South Downs National Park Authority, Brighton and Hove City Council and the five East Sussex authorities and a second study undertaken in 2016 relating to Wealden District and a new definitions. The bespoke Wealden study used the same methodology as the 2015 study with the exception of the changes to the definitions in line with national guidance and undertaken in agreement with the other parties of the 2015 study due to the differences in the local plan timescales of each individual authority.

9.2 The evidence base identified that there is a need within the District for permanent Gypsy and Traveller pitches, which the Wealden Local Plan seeks to meet through allocating 21 pitches on two sites: Land at Station Road, Hailsham (18 pitches); and Land at Lynholm Road, Polegate (3 pitches). A planning application has been submitted for the site at Station Road, Hailsham for 18 pitches and, subject to the access ownership being resolved, an application for 3 pitches on the Lynholm Road, Polegate site is expected in 2019.

9.3 There is no need identified for other types of pitches or plots for Travelling Showpeople however a criteria based policy for assessing proposals for Gypsy, Traveller and Travelling Showpeople proposals is contained within the Wealden Local Plan (Policy HG6). This has been developed from Policy WCS11 of the adopted Core Strategy Local Plan to take into account the fact that land has been allocated in the Wealden Local Plan and other policies contained within the Wealden Local Plan provide protection in relation to environmental matters and flood risk.

9.4 The development of the policies relating to Gypsy, Traveller and Travelling Showpeople have been subject to Sustainability Appraisal in 2015 as part of the Wealden Local Plan Issues, Options and Recommendations consultation and in March 2017 and August 2018 in relation to the Proposed Submission Wealden Local Plan. The March 2017 Sustainability Appraisal assessed Policy WLP2 and Policy HG5 and concluded that these policies should be selected from the options set out in the Issues, Options and Recommendations consultation document having an overall positive impact on the sustainability objectives. The August 2018 Sustainability Appraisal which looks at changes to the Wealden Local Plan from the version published in March 2017 concluded that the recommendations from the March 2017 Sustainability Appraisal are unchanged as there has been no material changes to any of the policies relating to Gypsy, Traveller and Travelling Showpeople in the Wealden Local Plan. It is therefore considered that the polices in the Wealden Local Plan have an overall positive effect on the sustainability objectives.

9 Conclusions



Published by
Wealden District Council
Council Offices
Vicarage Lane
Hailsham
East Sussex BN27 2AX
Tel: 01323 443322
Fax: 01323 443333
e-mail: ldf@wealden.gov.uk
Website: www.wealden.gov.uk