

Jean Radley  
Programme Officer  
Eastbourne Core Strategy – Examination  
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Eastbourne  
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4 May 2012

Dear Jean,

**Eastbourne Borough Council Response to issues raised in the Government's document 'Planning for traveller Sites'.**

The Council has considered the contents of the Governments 'Planning policy for traveller sites' and has assessed the Eastbourne Core Strategy in relation to it. The policy document contains nine policies which Local Planning authorities are required to take into account in the preparation of development plans and in making planning decisions. The following paragraphs summarise the policies and assesses how these relate to the Eastbourne Core Strategy and the evidence base upon which the Core Strategy is based.

The policy document states that it should be read in conjunction with the National Planning Policy Framework and much of that document where it relates to development principles will also be relevant to policy for gypsy and travellers.

**Planning Policy for traveller sites**

**Policy A: Using evidence to plan positively and manage development**

Paragraph 6. in summary this requires that in assembling the evidence base, local planning authorities should pay particular attention to early and effective community engagement – with both the settled and traveller communities. LPAs should co-operate with travellers, their representatives and relevant interest groups to prepare and maintain an up to date understanding of the likely permanent and transit needs of their areas over the lifespan of the development plan. LPAs should use a robust evidence base to establish accommodation needs to inform local plans and make planning decisions.

### **Eastbourne Core Strategy.**

- In drawing up Policy D6 and the accompanying text the Council has had regard to the background evidence provided for the single issue review of the South East Plan. This review was carried out following the issue by the Government of new guidance requiring Regional Spatial Strategies to address the accommodation needs of gypsies, travellers and travelling showpeople. The evidence prepared for the partial review included a Gypsy and traveller Accommodation Assessment (GTAA) carried out jointly with all East Sussex local authorities, in 2006. The conclusions of the GTAA showed a very low level of need for pitches in Eastbourne for the period to 2016. Although the SE Plan review process was not concluded following the government decision to revoke regional planning strategies, the unfinished SE Plan Panel report generally supported the findings of the GTAA. In Eastbourne without any regional distribution, this showed the likely need for permanent pitches to be between 1 and 3.
- EBC together with other East Sussex Local Planning Authorities, participates in the preparation of the multi agency 'East Sussex Traveller Strategy'. This aims to work in partnership to strike a balance between the needs of the settled and Gypsy and traveller communities. It contains an 'Action Plan' which *inter alia* sets targets for meeting the accommodation needs of gypsies and travellers in each of the constituent local authority areas. Target B1 is to 'meet the requirements for the provision as identified through the local Core Strategies'.
- As there are currently no official traveller sites in Eastbourne, evidence of need is collected thorough the social housing waiting list and the incidence of illegal encampments.

Information on illegal encampments over the last five years shows:

- 7.5.08 Fishermans Green – moved on by Police
- 3.6.10 Shinewater Field - Direction Notices served by EBC
- 19.8.10 Old Sita Site, Pevensey Bay Road, 1 Caravan - Direction Notice served by EBC
- 1.6.11 Five Acre Field - Direction Notices served by EBC

When council environmental officers visit a site to carry out welfare checks they always advise occupants of the site at Bridies Tan. Once Direction Notices are served these include maps and directions to Bridies Tan.

- The GTAA carried for the review of the South East Plan covers the period to 2016. The Council has acknowledged in paragraph 4.6.2 of the Core Strategy (Submission Document CS1) that there is a need to undertake a review of needs beyond 2016.
- The Council continues to work with the other East Sussex local planning authorities on a strategy for providing transit pitches – for Eastbourne this will use evidence of the use of the transit site at Bridies Tan in on the A27. There are 9 pitches on this site.

**Policy B: Planning for traveller sites**

Paragraphs 7 - 11 require local planning authorities to identify and update annually specific deliverable sites sufficient for five years, broad locations for years six to ten, and, where possible for years 11 – 15. Policies should seek to promote peaceful and integrated co-existence.

**Eastbourne Core Strategy**

- Policy D6 states that the Council will make appropriate provision to meet local needs. It has not been possible for specific sites to be identified in the Core Strategy but the Council intends to continue to work towards this goal. Due to the considerable environmental constraints to identifying sites to meet general development needs in Eastbourne the assessment work carried out by consultants Parker Dann failed to identify a suitable site.
- That there is a need in Eastbourne (although very low) is recognised and the monitoring framework in Appendix B of the core Strategy identifies the provision of pitches as a target with the number of pitches permitted and delivered included as an indicator of the delivery of Policy D6.
- The low level of need in the period to 2016 poses an issue in relation to the provision of infrastructure to service a site for only a few pitches. It would be more viable to provide for a larger number of pitches which would meet a longer term need, if this is shown by a review of needs, but this risks the site remaining largely empty for much of the time if provided early, which is a poor use of land in Eastbourne where there is a need to husband land resources carefully.
- Policy D6 is a criteria based policy which complies with paragraph 10 of the national policy document. It can be used both for the provision of local authority sites and the consideration of private planning applications, thereby enabling private pitch proposals to come forward in the absence of a official site.

- The last bullet point of Policy D6 requires regard to be had to the impact on the residential amenity of the settled community of any proposal for a traveller site, thereby seeking to reduce the potential for conflict between the two communities.

**Policy C: Sites in rural areas and the countryside, Policy D: Rural exception sites and Policy E: Traveller sites in Green Belt**

Eastbourne is an urban authority and does not contain any Green Belt and these policies are therefore not applicable.

**Policy F: Mixed planning use traveller sites**

Paragraphs 16 to 18 require local planning authorities to consider traveller sites where mixed residential and business use would be suitable.

**Eastbourne Core Strategy**

- Whilst there is no specific identification for traveller sites, Policy D6 does not preclude a mixed use site and there is therefore no conflict with the policy document.

**Policy G: Major development projects**

Paragraph 19 requires the local planning authority to seek to identify alternative provision if a traveller site is affected by a major development project.

**Eastbourne Core Strategy**

- There are currently no traveller sites within Eastbourne and therefore none which would be affected by any of major development proposals. There is no conflict between Policy D6 and the policy document.

**Policy H: Determining planning applications for traveller sites**

Paragraphs 20 – 26 set out the matters which local planning authorities should consider when determining planning applications. Paragraph 22 requires local planning authorities to have regard to the existing level of local provision and need for sites.

**Eastbourne Core Strategy**

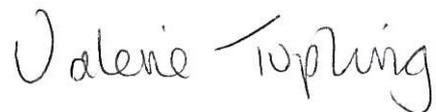
- Policy D6 is a criteria based policy which can be used in assessing planning applications for traveller sites. If a planning application is made the Council accepts that the lack of official sites will be a material consideration.

**Policy I: Implementation**

Paragraphs 27 – 29 set out how the new national policy will be applied. It relates mainly to the policy concerning applications for temporary planning permission. There is no conflict between these paragraphs and the Core Strategy.

In conclusion the Council considers whilst there is no specific provision for travellers in the Core Strategy, it has demonstrated a commitment to implementing the new national policies through further work on traveller needs, monitoring of current indicators of need, and by the inclusion of a criteria based policy which could allow private planning applications for traveller pitches to come forward.

**Yours sincerely**

A handwritten signature in black ink that reads "Valerie Tupling". The signature is written in a cursive, flowing style.

**Valerie Tupling  
Planning Policy Manager (Job Share)  
Eastbourne Borough Council**