

Date: 2 August 2018
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Lewes District Council
Via email

Dear Head of Planning

Gypsy and Traveller Pitch Provision - Duty to Cooperate request

This letter represents a Duty to Cooperate request to assess the extent to which the unmet need within the Brighton & Hove's City Plan area may be accommodated within authorities' administrative areas.

Brighton & Hove City Council is currently producing the [City Plan Part Two](#), and a draft Plan is currently subject to a public consultation until 13th September 2018.

[City Plan Part One](#) was previously adopted by the Council in March 2016. Policy CP22 of Brighton & Hove City Council (BHCC)'s City Plan Part One relates to Traveller Accommodation. The policy sets out that the council will seek to deliver 18 permanent pitches to meet assessed requirements to 2019. This figure was established through the Partial Review of the South East Plan process (2007 – 2010) which indicated a need for 16 pitches to be provided in Brighton & Hove by 2016, and extrapolated to 18 by 2019 using a 3% per annum pitch need growth rate. The 12 pitches at Horsdean contribute towards this need. The policy also states the council will review needs to cover the remaining plan period to 2030, and includes criteria by which any planning application would be judged.

The City Council undertook a joint Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment with the South Downs National Park Authority (SDNPA), which was published in November 2014. The primary purpose of that report was to provide an updated evidence base and to inform the future development of planning policies through Local Plans. The assessment analysed need for further traveller pitches as it stood in February 2014 in addition to those provided at Horsdean, and presented the projection of requirements for the following five year planning periods:

	Brighton & Hove LPA Area	SDNP LPA area of Brighton & Hove	Travelling Showpeople Need
Residential need 2013/14 – 2017/18 (pitches)	15	8	0
Residential need 2018/19 – 2022/23 (pitches)	2	2	0
Residential need 2023/24 – 2027/28 (pitches)	2	2	0
Residential need 2013/14 – 2027/28 (pitches)	19	13	0

Table 1: Assessed need for new residential pitches in the area over the period to 2027/28

To seek to address the requirement for new permanent pitches, the City Council has undertaken a joint site search exercise with the South Downs National Park Authority in an attempt to identify sites within the administrative area of Brighton & Hove, including part of the National Park, which could be suitable for allocation in CPP2. This exercise did not identify any suitable and available sites. The process undertaken is set out in two background documents which are available on the City Plan Part Two webpage¹.

The Council remains supportive of proposals for new pitches coming forward and any planning applications for such development will be judged against the criteria in City Plan Part One Policy CP22. Moving forward, the Council is keen to progress discussions on this issue at a sub-regional level through the development of Local Strategic Statement 3.

However, as gypsy and traveller pitches represents a strategic unmet need which the City Council is unable to accommodate within its own boundaries, this letter represents a Duty to Cooperate request to assess the extent to which the unmet need within the City Plan area may be accommodated within other authorities' administrative areas.

Please may I have a response from your authority by Friday, 31st August setting out whether your authority is able to assist in meeting Brighton & Hove's unmet need. If your authority is not able to assist please also provide links to supporting evidence to justify this position.

If this is not possible or if you have any issues that you would like to discuss please contact Steve Tremlett, Principal Planning Officer on (01273) 292108 or steve.tremlett@brighton-hove.gov.uk who would be pleased to discuss any issues you have with this request.

Yours sincerely

Liz Hobden
Head of Planning

¹ <https://www.brighton-hove.gov.uk/content/planning/planning-policy/city-plan-part-two-background-studies-topic-papers>