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Mrs Jean Radley Programme

Tel No. 01323 415121

To: Val Tupling and Iona Cameron, Eastbourne Borough Council, (Planning Policy Team)

30th July, 2012

Dear Val/Iona

## **Traveller Sites**

The Council has provided additional information to support the Core Strategy approach to providing traveller sites. This includes the latest Appendix 2 to document CS52 (B) which was submitted on 18 June. I have carefully considered all this information, together with all the supporting documentation and discussion of this matter at the examination hearings.

The latest GTAA showed a very low need for gypsy and traveller accommodation in Eastbourne to 2016. Nevertheless even this modest need is not addressed in a positive way in the CS. Looking beyond 2016, the Council has confirmed that it is seeking to collaborate with neighbouring local planning authorities to set targets and address need in the second half of the CS plan period. However there is no indication that this work is ongoing, with the latest minutes of a cross boundary meeting on this matter dated September 2010.

Document CS52 (B) summarises the work that has been carried out to assess potential sites. It highlights the difficulty of identifying suitable pitches in Eastbourne, with the highest scoring site lying outside the scope of the CS in the South Downs National Park. This only serves to emphasise the need for a positive approach to plan for gypsy and traveller accommodation.

Submission document L18, setting out the Council's response to "Planning policy for traveller sites," acknowledges that the CS makes no specific provision for travellers apart from the criteria based Policy D6. This policy does not represent "positive planning" nor does it meet the requirements of Planning policy for traveller

sites, which requires Local Plans to identify specific deliverable sites for five years worth of sites and specific developable sites for years six to ten and where possible years 11 - 15.

I recognise that Planning policy for traveller sites was published after the CS was submitted for examination and that the CS was prepared in the context of now superseded policies in Circulars 01/2006 and 04/2007. However to ensure soundness the CS should demonstrate that there is a real prospect of meeting the need for traveller accommodation during the plan period. The following options could be considered:

- 1. Provide firm evidence that the need will be met by others. This would require a commitment from a neighbouring authority or authorities in the East Sussex area.
- 2. Identify a site/sites to meet the need up to 2026

  This would require an assessment of the need from 2016 –
  2026 and allocation of an appropriate site, such as one of the sites identified in the SHLAA.
- 3. Delegate identification of a site/ sites to a separate DPD. As the LDS does not include a Site Allocations DPD this would need to be a new DPD, added to the LDS.
- 4. Re draft Policy D6 to encourage proposals for sites for traveller accommodation.

Any of the above solutions would require a main modification to be put forward, which would need to be the subject of consultation. Please would you inform me of how you wish to take this matter forward?

Your	s since	rely,
Sue	Turner	

Inspector