# Lewes District Council

# Local Plan Part 2 Background Paper

# Gypsy and Traveller

**November 2018**

Lewes District Council

## Contents

## 1. Purpose of Background Paper

1.1 A number of background papers have been produced during the process of preparing the Lewes District Local Plan Part 2. The purpose of these papers is to provide further information relating to either certain policy areas or procedures undertaken in developing Local Plan Part 2. This background paper focusses on the proposed allocation of a permanent Gypsy and Traveller site.

## 2. Introduction

2.1 Core Policy 3 (CP3) of Local Plan Part 1: Joint Core Strategy (JCS) provides a framework for the provision of Gypsy and Traveller accommodation within Lewes district, including the area within the South Downs National Park (SDNP), in line with national planning policy[1].

2.2 Core Policy 3 identifies the number of permanent pitches required across the district for the period 2014 and 2030, as well as its distribution between the areas outside and inside the SDNP. It requires the total provision of 13 net additional permanent pitches; five outside and eight inside the SDNP respectively. The South Downs National Park Authority (SDNPA) has identified two sites for a total of five permanent pitches within their Submission Local Plan. Core Policy 3 contains a set of criteria to guide allocations and/ or consider planning applications against for Gypsy and Traveller pitches. The full wording of Core Policy 3 is set out in appendix A.

2.3 The level of need for permanent pitches was established through the 2016 East Sussex and the South Downs National Park Authority Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA)[2]. The GTAA also assessed the need for additional transit pitches within East Sussex concluding a provisional need for eight additional pitches. Draft Policy GT01 within the emerging Local Plan Part 2 identifies a site for five permanent pitches. A transit site, Bridies Tan, already exists within Lewes District, therefore the preferred approach would be to identify any additional transit site(s) within the eastern part of the County to provide continual network of short-term accommodation.

[1] Planning Policy for Traveller Sites, Department for Communities and Local Government, August 2015.
[2] Undertaken by the Sustainable Housing & Urban Studies Unit and University of Salford.

## 3. Site Search

3.1 An extensive site search was undertaken to inform the JCS with the intention of strategic provision for the district through an allocation in the higher level plan. This included writing to proponents of land from the Strategic Housing Land Availability Assessment (SHLAA) that had been filtered for potential housing due to their proximity to a development boundary (more than 500m). Consent was sought to formally assess land for Gypsy and Traveller use. The 2011 and 2012 Gypsy and Traveller Site Assessments[3] did not result in an allocation due to a range of issues with the potential sites, notably highways constraints and land availability prevented sites progressing. Bridies Tan was also later considered to establish if additional pitches, for permanent use, could be accommodated, however the site's location between the A27 and existing business units do not allow for any expansion. Furthermore, the site is a valuable asset in redirecting unauthorised encampments which local authorities within the County would not want to see compromised.

3.2 It therefore fell to Core Policy 3 of the JCS to set the requirement for pitch provision for each Local Planning Authority, Lewes District Council (LDC) and the SDNPA, and establish criteria against which a future allocation or planning application would be assessed.

3.3 The Regulation 18 Consultation Draft Local Plan Part 2 made clear the requirement for the Local Plan Part 2 to deliver a suitable site for five permanent pitches outside the SDNP. The Council's SHLAA had not yielded any new options for consideration at that time, therefore as part of the public consultation on the Consultation Draft Local Plan Part 2 between November 2017 and January 2018 the Council ran a 'call for sites' for potential land available to be assessed for Gypsy and Traveller sites. The Council received three representations on the Consultation Draft Local Plan Part 2 concerning provision of pitches, but no potential sites were submitted. Concurrently at this stage the Council began to reassess the options for the delivery of a site, including any of its own landholdings and land that had been put to the council as potential affordable housing rural exception sites.

Proposed Gypsy and Traveller site

3.4 Internal communications, regarding land put to the Council for affordable housing consideration, resulted in the discussion of a site known to Planning Policy from the 2012 Site Assessment. The site as submitted to the SHLAA, at 4.4ha, is far greater in size than the requirement for five pitches would

[3] Site assessment document can be found on Background Reports webpage (https://www.lewes-eastbourne.gov.uk/planning-policy/lewes-background-reports/)

need. The whole site was assessed for this use through the 2012 Site Assessment for the full district requirement (13 pitches) to inform the JCS. The assessment considered two access points, one from St Helena Lane and one from where the Public Right of Way intersects Station Road. Highways comments concluded that access at these points could not be achieved and the site was not considered further at that time.

3.5 Understanding that this land was still available in principle for this type of development the Council reviewed its potential for Gypsy and Traveller use, focussing on a much smaller area of the larger field. A location plan and aerial photo of the site, as well as photos of an example permanent pitch, are provided in appendix B. The 2018 assessment considers just 0.69ha in the southeast corner, where there is now an agricultural access onto Station Road associated with the use of an agricultural barn that has planning permission for construction, but is not built.

3.6 As part of the review and assessment of the proposed site the Council sought fresh advice from East Sussex County Council, including highways, landscape, flooding and ecology. The Council also commissioned a speed survey in 2018 to inform the suitability and potential deliverability of an allocation on this land see appendices C & D.

3.7 To assist ESCC in providing the Council with in-principle comments, an indicative layout of the site was provided. An existing local permanent Gypsy and Traveller site was used to create the indicative layout, see appendix E.

***Consideration of Land south of The Plough in line with Core Policy 3 – Gypsy and Traveller Accommodation***

| Core Policy 3 Criterion | Commentary |
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| Site size and capacity | The site is approximately 0.69ha with a capacity for 5 permanent pitches. |
| Flooding (CP3 1) | National Planning Policy for Traveller Sites (PPTS) states that Gypsy and Traveller sites should not be located in areas at high risk of flooding. This is reinforced within Core Policy 3. The Environment Agency classifies caravans, mobile homes and park homes intended for permanent residential use as highly vulnerable. The proposed site is within flood risk zone 1 – low probability of flooding from river or sea. For the majority of the site there is a very low flood risk from surface water. Along the southern boundary of the proposed site there is a low flood risk associated with the stream.<br><br>ESCC, as the local lead flood authority, provided a Flood Risk and Drainage Report for the proposed site highlighting any risk of flooding (fluvial, coastal, surface and groundwater), relevant |

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| | watercourses and drainage assets, as well as water quality aspects. The Report confirms that part of the site is at flood risk from surface water but not fluvial/ coastal or groundwater. It reports no incidents of flooding on or immediately adjacent to the proposed site since 2010.<br><br>As such, ESCC advised that "*The proposed site layout and levels should consider surface water flood risk to ensure that flood risk is not created on or off-site*."<br><br>*See appendix E – flood risk extract from 2018 ESCC Flood Risk and Drainage Risk Report* |
| Land contamination (CP3 1) | The proposed site is adjacent to a former brickworks site. Historic maps indicate the first presence of the brickworks around the start of the 19th Century. The brickworks use appeared to stay within a relatively contained area (south of the stream which borders the proposed site). From the late 1950s the brickworks site had permitted agricultural use (poultry farm). The site has now been in mixed industrial use for about 18 years.<br><br>Whilst the proposed site does not have the above same historic uses and therefore the contamination risk is low, due to its proximity it is considered that a cautious approach is taken and investigations into potential contamination undertaken as part of the planning application stage. |
| Existing nearby uses (CP3 1) | PPTS states that proper consideration should be given to the health and well-being of any travellers on site or on others as a result of new development, in terms of the local environmental quality (such as noise and air quality). The proposed site is located adjacent to the Old Brickworks industrial estate and a residential property. The light industrial estate accommodates several local businesses. Approximately 30m to the east (measured from the nearest point of the proposed site's boundary to the middle of the property), are two residential properties. The Plough pub is approximately 200m to the north and further residential properties are located approximately 275m to the north west of the proposed site.<br><br>It is not considered that these existing uses will cause undue harm, in terms of effects of noise or air quality, on the residents of the proposed site. It is also not considered that the proposed development will have an unreasonable impact, in terms of noise and air quality, on existing nearby residents or businesses, or on the enjoyment of the wider area by the local community. The site is proposed as a permanent Gypsy and Traveller site, rather than a transit site which are normally associated with higher levels of vehicular movements due to their nature as time limited accommodation.<br><br>The proposed site is currently naturally screened to the south and east by trees and hedges, the retention of which will help mitigate some potential increases in noise from the proposed development on existing residents and businesses, and vice versa. |

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| Accessibility to settlements with services and facilities (CP3 2) | PPTS requires the consideration of access to health and educational facilities whilst avoiding undue pressure on local infrastructure and services. The proposed site lies within Plumpton parish. The settlement of Plumpton Green is the largest settlement within the parish and classified as a service village within the district's settlement hierarchy. This recognises that Plumpton Green has a basic level of services and facilities where day to day needs can be met.<br><br>Plumpton Green has a primary school, local convenience shop with Post Office, train station with services to Haywards Heath and Lewes, and bus services (although limited) to Haywards Heath and Lewes. The majority of these facilities are located in the southern part of the settlement between 1.5km and 1.9km south of the proposed site. The nearest bus stop is approximately 150m north of the proposed site. The District Council's 2017 Infrastructure Delivery Plan (IDP) does not identify capacity concerns at either of the nearest primary schools (Plumpton and Wivelsfield). ESCC's Education Commissioning Plan (2017-2021) identifies an increasing demand for secondary school places at Chailey, but note that the demand is unlikely to exceed their published admission numbers.<br><br>A doctor's surgery and secondary school are also located approximately 2.5km away at South Chailey. No capacity concerns are identified, within the IDP, at the nearest GP surgery at South Chailey.<br><br>The location of the proposed site is supported by the ESCC Traveller Team, considering that there is "sufficient access to local amenities including schools and health". |
| Local historical, environmental and landscape designations (CP3 3) | CP3 seeks to protect the special features of national historic, environmental and historic designations. The proposed site is not within, or adjacent to, a local or national environmental or landscape designation, such as a National Park, Sites of Special Scientific Interest (SSSI), Local Wildlife Site or Local Green Space.<br><br>The ESCC County Archaeologist confirmed that the proposed site is not within an Archaeological Notification Area and no designated heritage assets or finds are recorded on the immediate site. However, there is evidence of historical use in the wider area and therefore further assessment will be needed as part of a future development proposal. |
| Vehicular and pedestrian access (CP3 4) | The proposed site has an existing access point associated with previous planning applications LW/08/0165 (erection of a barn) and LW/08/0807 (retrospective planning permission for access tract), although it has become overgrown. It is proposed that, with the required improvements, this will form the access point for vehicles and pedestrians. The highway authority provided comments on the access and potential layout of the proposed site.<br><br>At the junction with Station Road the national speed limit |

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| | applies. A speed gun speed survey and full seven day speed survey were undertaken by ESCC in August and September 2018 respectively at the proposed point of access. The data gathered from the full speed survey showed that the average 85th percentile speed was 45mph southbound and 44mph northbound. These results require sightlines of 120m from a setback of 2.4m and are considered achievable. Management of the hedgerow will be needed to secure sightlines. Improvements to achieve widths will also be needed. Notwithstanding the results of the speed survey, the District Council are aware that Plumpton Parish Council has a longstanding aspiration to have the speed limit reduced in the approach to the village. The District Council with ESCC will consider whether this can be realised as part of any future proposal.<br><br>With regards to the provision of pedestrian access the highway authority consider that footway connections to the bus stop to the north would be beneficial to a future proposal. This would benefit the proposed site as well as employees at The Old Brickworks who use the local bus service. |
| Infrastructure (CP3 2 & 5) | PPTS requires consideration of access to health and educational facilities whilst avoiding undue pressure on local infrastructure and services.<br><br>The size of the proposed site allows for the provision of five permanent pitches, each capable of accommodation a static caravan, a touring caravan, a vehicle and amenity block. The indicative layout shows how this can be achieved, as well as accommodating some amenity space.<br><br>As noted above, the proposed site is not within flood risk zone 2 or 3. However, there is a stream that runs along the southern boundary of the proposed site which poses a low risk to some limited surface water flood risk. It is considered that this can be mitigated through the layout of any final scheme and surface drainage strategy to minimise the risk to the proposed site and not exacerbate the existing flooding situation.<br><br>Connections to water and electricity are not a constraint to the delivery of the proposed site. There is no sewerage or gas connection in the nearby area. The development would therefore need to provide onsite disposal of foul water. Heat and power needs will be provided by electricity. |
| Residential amenity (CP3 6) | PPTS states that policies should promote peaceful and integrated co-existence between the site and the local community. CP3 promotes this through ensuring that consideration is given to the privacy of residents of and adjacent to the proposed site.<br><br>An established hedgerow and line of mature trees along the eastern and southern boundaries of the proposed site, respectively, offer some existing natural landscape screening. To the north and west the site is otherwise relatively open, although the topography of the proposed site and wider field |

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| | provides an opportunity to create natural screening, in the form of bunding, using earth relocated from levelling the site, and a clear development boundary. This would help provide privacy for both future and existing adjacent residents of the proposed site, as well as form a defined landscape buffer and boundary to avoid potential encroachment of the site into the adjacent field.<br><br>The above approach, in terms of layout, scale and landscaping is supported by the comments received from the County Landscape Architect and Traveller Team. The Traveller Team considers that "The site does not "impose" on the local community and with sufficient screening this should not be a problem for the site residents or local community." and that the indicative layout "works well for access of emergency vehicles, but also giving residents space and an equal share of the site pitch space.". The highway authority also indicates that the indicative layout provides sufficient turning space for refuse collection. |

* The settlement hierarchy is taken from the 2012 Rural Settlement Study.

## 4. Delivery

4.1 The Council is investigating the grant funding available from central government to assist in the delivery of this site. The costs of delivery are not known; although comparator costs for recent site refurbishments are available all have had abnormal costs that make direct comparison difficult. It is likely that separate bids will be required for the land purchase costs and build costs. A meeting with Homes England is being organised to better understand the bidding structure and opportunities for the delivery of such a site and land use. It is not immediately clear how this land use with a low and protracted rate of return would be delivered without substantial assistance from central government.

4.2 Indicative designs for the layout of the site have been based upon other sites within East Sussex and consultation with site management team in East Sussex as to which design seemed to work best. It will be for the detailed application stage to formally establish how the site will be laid out. There will be an adequate landscape bund to the north of the site to keep the site enclosed and minimise landscape impact views from the north.

4.3 The required visibility splays can be achieved for the existing access onto Station Road to be utilised, however some minor works to the hedgerow may be required and routine maintenance will be necessary.

4.4 If the development is delivered as a public site then it is anticipated that ESCC, in their existing role as manager of other public sites within the County, would manage the proposed site. ESCC manage closely the licence-holders and deal swiftly with any breaches. Any potential site tenant will be vetted and occupation will be licence agreement only.

4.5 Delivery of the site would benefit from a footpath to the bus stop further along Station Road and from reduced speed limit along Station Road, which currently has national speed limits. These items would add considerable costs to the delivery of the project, however and therefore ongoing discussions with ESCC will be required to understand the feasibility of these items.

## 5. Plumpton Neighbourhood Plan

5.1 The Plumpton Neighbourhood Plan (PNP) was subject to a successful referendum on 8th March 2018 and was 'made' by Lewes District Council (LDC) on 2nd May 2018. The PNP seeks to retain the character of the Parish and strengthen its relationship with the landscape setting and strong sense of community by improving public access, open spaces and community facilities through planning policies and designations/allocations. It provides for a modest growth in housing numbers on specific sites around Plumpton Green, which slightly exceeds the number set by the Lewes District Local Plan Part 1: Joint Core Strategy 2010-2030 (JCS) which was adopted in May 2016.

5.2 The PNP does not identify a site for Gypsies and Travellers. However, it is not a requirement for Neighbourhood Plans specifically to do so. *Core Policy 3 – Gypsy and Traveller Accommodation* of the JCS states that where Gypsy and Traveller Accommodation is not identified through Neighbourhood Plans, the *Lewes District Local Plan Part 2: Site Allocations and Development Management Policies* (LPP2) will allocate specific sites for the purpose.

5.3 The site proposed as a Gypsy and Traveller accommodation site under Policy GT01 for five permanent pitches in the Pre-Submission version of the LPP2 had not been considered as a potential development site for allocation in the PNP, nor has it been designated as a Local Green Space by it.

5.4 The most notable policies within the PNP against which this proposed allocation needs to be considered in relation to its consistency are:

- Policy 1: Spatial Plan for the parish
- Policy 2: New-build environment and design
- Policy 3: Landscape and biodiversity
- Policy 4: Sustainable drainage and wastewater management

- Policy 6: Local employment

**Policies of the Plumpton Neighbourhood Plan**

Policy 1: Spatial Plan for the Parish

5.5 This policy states that new development proposals within the planning boundary will be supported provided other requirements of the Neighbourhood Plan are met. This policy also states that development resulting in the coalescence of the distinct identities of neighbouring settlements or an alteration of the spatial character of the landscape (notably from the SDNP) will not be supported.

5.6 It is noted that the site subject to Policy GT01 lies outside of the existing planning boundary. However, the proposed site lies adjacent to the Old Brickworks on the west side of Station Road and opposite a farm and small number of residential properties on the east side of the road. The proposed site occupies a corner of a much larger field; this being the case, the visual impact of low density development such as this is unlikely to result in a significant wider visual impact when viewed from numerous locations due to the combination of being located close to clusters of existing buildings and limited road frontage.

5.7 Notwithstanding this, criterion c) of Policy GT01 requires that:
*Development should use the natural topography in screening the site from wider, sensitive landscape views and designed to minimise the perception of urbanisation in this location, particularly with regards to hardstanding and amenity buildings;*

5.8 It is considered, therefore, that emerging Policy GT01 makes adequate provision for the requirements set in Policy 1 of the Plumpton Neighbourhood Plan, despite the location of the site being outside of the existing planning boundary.

Policy 2: New-build environment and design

5.9 The key requirement of this policy is that new development should reflect its setting and be appropriate in its location. There are a number of criteria with which development proposals should comply.

5.10 There is nothing within the text of emerging Policy GT01 which would directly contradict this Neighbourhood Plan policy, but proposals for the development of the site would need to comply with this policy as much as any other new development within the parish.

Policy 3: Landscape and biodiversity

5.11 Criterion c) of emerging Policy GT01 requires that development utilises the topography of the site to naturally screen the site from wider sensitive landscape views and to minimise the perception of urbanisation. Criterion e) requires that an ecological impact assessment is carried out and that, "development allows for the protection of biodiversity and enhancement where possible". Policy 3 requires that new development should be informed by the "landscape character of the area" as well as being informed by the contribution of trees and hedges, provision for wildlife and the retention/ enhancement of green corridors, ponds and other wildlife features.

5.12 Although emerging Policy GT01 is does not provide the detail that Policy 3 does in terms of landscape and biodiversity provision, it does set a high standard for the development of the site in its criteria (e.g. its requirement for an ecological impact assessment). Bearing this in mind, emerging Policy GT01 is considered to be consistent with the aims of Neighbourhood Plan Policy 3 in both protecting the character of the area as well as the biodiversity/wildlife provision.

Policy 4: Sustainable drainage and wastewater management

5.13 The aim of Policy 4 of the Plumpton Neighbourhood Plan is to encourage the inclusion of appropriate sustainable drainage and wastewater management provision within new developments.

5.14 Policy GT01 seeks to ensure an appropriate flood risk assessment and surface water drainage strategy /mitigation forms part of development on the site via requirements set out in criterion f). As such, the policies are compatible in their application.

Policy 6: Local employment

5.15 This policy seeks to support employment provision within the Parish and encourage growth, where appropriate.

5.16 The proposed site for Policy GT01 lies adjacent to a site, known as the Old Brickworks, which provides employment in the Parish. The wider area is peppered with large and low density residential properties amongst fields. This site is not recognised specifically within any policies of the Development Plan, but insofar as the PNP is concerned, the loss of employment or business uses within the Parish would be resisted as per the requirements of Policy 6.

5.17 It is not considered that the allocation of a Gypsy and Traveller site immediately to the north of the Old Brickworks would in any way materially compromise the functioning of the existing or any future businesses. The Old Brickworks is currently bounded to the south by residential properties and obliquely north east on the other side of Station Road. As such, it is considered that the immediate area surrounding the Old Brickworks is compatible with residential use, such as a permanent Gypsy and Traveller site and this allocation would not negatively impact the employment uses, nor is it likely to affect their expansion in the future.

**General consistency between Policy GT01 and the PNP**

5.18 The PNP does not prevent the delivery of sustainable development, nor does it place onerous requirements on developers. It is a Neighbourhood Plan which responds sensitively to the location of Plumpton Parish and seeks to support development which respects the area and responds to the local community.

5.19 It is not considered that anything within the PNP contravenes any EU obligation or the Convention Rights (within the meaning of the Human Rights Act 1998). As such, it is a document which abides by Article 14 (*Prohibition of discrimination*) of the Convention Rights and its policies make no assumptions regarding the race, national or social origin etc. of individuals who live or work or will live or work within the Parish in the future.

5.20 Policy GT01 seeks to develop and support mixed and sustainable communities and as such also responds to the Convention Rights (within the meaning of the Human Rights Act 1998). This being the case, it is considered that in general the allocation does not conflict with the vision or aims of the PNP.

5.21 Overall, the allocation made by the emerging LPP2 Policy GT01 and its specific criteria are considered to be consistent with the JCS, the PNP and its policies in general.

5.22 It is noted that the proposed site is outside of the settlement boundary. Notwithstanding this, the PNP does not prohibit development outside the planning boundary, where it is appropriate, as it is a Neighbourhood Plan which contributes to the achievement of sustainable development. Nevertheless, despite being outside of the settlement boundary, the site does not have a substantial road-frontage and as such, would not result in the appearance of “ribbon development” or contribute to the coalescence of

clusters of existing development along Station Road. The criteria of Policy GT01 seek to ensure that the development of the site does not result in a development which appears inappropriate as it requires mitigation measures and thoughtful use of the topography of the site to provide screening for occupiers as well as protecting nearby sensitive views.

5.23 It is concluded, therefore that there are no direct inconsistencies between the PNP and emerging Policy GT01.

## 6. Summary

6.1 The Council is required, through Local Plan Part 2, or neighbourhood plans, to deliver the policies of the adopted Local Plan Part 1: Joint Core Strategy. Core Policy 3 (CP3) (*Gypsy and Traveller Accommodation*) clearly identifies a need for the provision of five net additional permanent pitches, outside the South Downs National Park. No 'made' (adopted) or emerging neighbourhood plans have sought to allocate sites for Gypsy and Traveller permanent pitches. Local Plan Part 2 therefore proposes Draft Policy GT01 to ensure the delivery of CP3.

6.2 The Council carried out an extensive search for potential suitable sites for Gypsy and Traveller use. The proposed GT01 site allocation has been assessed against specific criteria set out in Government's 2015 Planning Policy for traveller sites and CP3. Draft Policy GT01 is considered consistent with national policy, the Joint Core Strategy and Plumpton Neighbourhood Plan, and considered 'sound' in line with the National Planning Policy Framework.

## Appendices

### APPENDIX A – Core Policy 3: Gypsy and Traveller Accommodation

**Core Policy 3 – Gypsy and Traveller Accommodation**

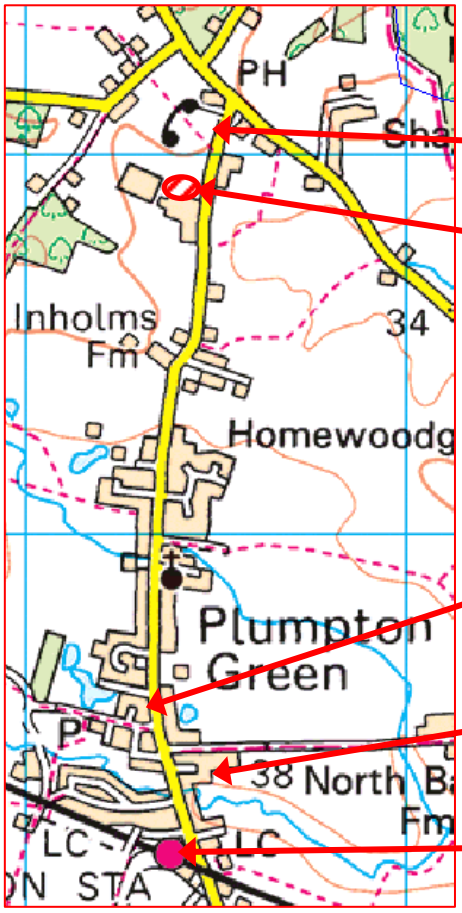
**Provision will be made for a net total of 13 additional permanent pitches for Gypsies and Travellers to serve the needs for the period 2014 to 2030. Of these 5 pitches will serve the needs of the area outside the National Park and 8 will serve the needs within the National Park area of the district. The local planning authority will allocate specific, deliverable sites through the Local Plan Part 2 and the SDNPA Local Plan, unless allocated through Neighbourhood Plans. These allocations will be informed by appropriate Site Assessment work and take into account any planning permissions granted for permanent use in the interim.**

**In guiding the allocation of permanent Gypsy and Traveller sites and/or considering planning applications for sites for Gypsies and Travellers and Travelling Showpeople, proposals will be supported where the following criteria have been met and they are in conformity with other relevant district wide policies:**

1. **Avoid locating sites in areas at high risk of flooding or significantly contaminated land, or adjacent to existing uses incompatible with residential uses, such as waste tips and wastewater facilities;**
2. **The site is well related to, or has reasonable access to settlements with existing services and facilities such as schools, health services and shops;**
3. **The proposal does not compromise the special features of national historical, environmental or landscape designations such as the South Downs National Park, Lewes Downs and Castle Hill Special Areas of Conservation (SAC) and Sites of Special Scientific Interest (SSSI);**
4. **There is safe and convenient vehicular access to the road network**
5. **There is capacity to provide appropriate on-site physical and social infrastructure such as water, power, drainage, parking and amenity space; and**
6. **Adequate levels of privacy for residents on and adjacent to the site are provided through planning considerations such as site layout, scale and landscaping.**

**Proposals for sites for Travelling Showpeople should also include adequate space for storage and/or keeping and exercising any animals associated with Travelling Showpeople's needs.**

## APPENDIX B – Location Plan of GT01 and photos




Bus stop

Proposed GT01 site

Local convenience store/ PO, approx. 1.49km from site

Primary school, approx. 1.75km from site

Plumpton Railway Station, approx. 1.89km from site

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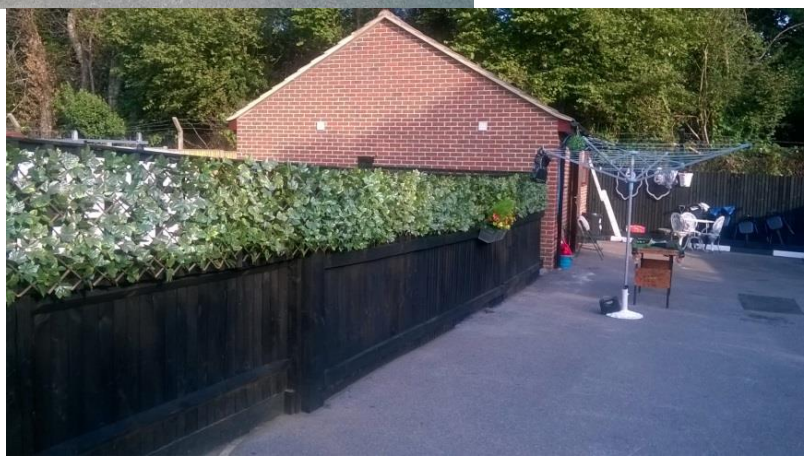
Aerial view of GT01


*Satellite image from Google*

Photos of a local example permanent pitch



*Photos provided by ESCC*

## APPENDIX C – Correspondence on proposed GT01 allocation

**Gypsy and Traveller Team Manager, ESCC, August 2018**

Hi Natalie,

Further to our conversation earlier today and our previous meeting. I have read through the Core Strategy and Core Policy 3 and believe the proposal meets the criteria. The site is ideally situated in a semi-rural area which is attractive to Gypsies and Travellers. This site will also give sufficient access to local amenities including schools and health. Please note also that although there is not pedestrian access to and from the site this is not a barrier to the proposals. We have a similar situation in Hailsham where our Swan Barn Site does not have pedestrian access. The road is national speed limit, although we have in the past requested this is reduced for noise and safety of children that may wander on to the road. The pitches would need to be considered to be a safe distance from the road, which Option 1 would satisfy. Also pitches are fenced and gates on our permanent site and I would expect this to be similar if this proposal was to go ahead.

The site does not "impose" on the local community and with sufficient screening this should not be a problem for the site residents or local community. The plans attached (especially option 1) which is based on our Polly Arch existing site would be a suitable option moving forward. This layout works well for access of emergency vehicles, but also giving residents space and an equal share of the site pitch space.

There is a need in Lewes DC for the creation of an additional 5 pitches. We have a number of applications for all of our sites and an increasing number of homeless Travellers that are looking for permanent pitches across the county

I agree with the proposals put forward and am willing to assist further if required

Kind Regards

**Jim Alexander**
Team Manager
Gypsy and Traveller Team, Communities, Economy and Transport Department

**County Landscape Architect, ESCC – July 2018**

Dear Natalie,

The key landscape considerations will be to:

1. Retain and protect the existing hedge along the road side and the mature oak trees along the southern boundary.
2. Provide an adequate planted buffer between the site and the road.
3. To provide a planted buffer to the countryside to the north and west of the site. If the site is levelled so that there is a slope down from the rest of the field this would help to screen the site from the wider countryside and the bank could be planted with trees and understorey shrubs. This may require more land take than shown in order to grade out the bank to a gentle slope so that it appears natural and not over engineered.

The Indicative option 5 would provide a central focal space which the plots face into and from a design point of view is the most logical. The development would need to be pulled back from the road in order to provide an enhanced buffer and protect the hedge. The access road would need to be away from the root protection area of the oak trees on the

southern boundary.

I hope this is helpful call me on 07786171433 if you have any questions.

Ginny

**Virginia Pullan**
County Landscape Architect
Environment Team, Communities, Economy and Transport

**Principal Officer, Transport Development Control, ESCC**

**July 2018**

Hi Natalie,

I understand the access has recently been reconstructed, but Google maps is not updated, can you confirm I'm correct? I don't have time to go and see this access on site, unfortunately. I do recall looking at this access a couple of years ago (Willow farm) and recommending the boundary hedge is either set back further into the site to secure the driver site lines looking north based on the 85% actual speeds.

From a highway perspective, the sites with sufficient turning provision for refuse collection are the preferred options (1 & 5). The layouts should be supported with a swept path plan.

The proposed 5-6 units are considered as housing units and in planning terms would need to have travel choice. There are bus stops to the north, but no footways to reach them. The services available are very limited; less frequent than 1 bus per hour.

I hope that this helps. Do not hesitate to ask if there are any other highway issues.

**Ms Kal Kamboh**
Principal Officer
Transport Development Control

**August 2018**

Hi Natalie,
I took a trip out today with the speed gun and sat at the access for 45 minutes 10.15-11am approximately. 56 vehicles were recorded with highest speed 46 mph and lowest at 18 mph. The average was 32 mph and 85$^{th}$ %ile works out at around 40 mph. Obviously this is a very small sample and there would certainly be a margin of error if compared with a 7 day survey, and weather conditions being a little wet, may have reduced speeds slightly.
However, if these were close to reflective of a larger survey sample we would be seeking 120m in each direction from 2.4m set back point. Shown on a plan there is a small hatched area I've marked which would be outside the site and currently obstructs visibility.

I trust this helps, let me know if you wish to discuss further.

Regards

**Ms Kal Kamboh**
Principal Officer
Transport Development Control

**September 2018**

Hi Natalie,
I think a means to connect would be beneficial and I've suggested on the attached plan (I picked one of the layouts you'd previously sent, without prejudice) an internal link to the PROW and a footway to the bus stop. Due to the rural location, I envisage that urban features are unlikely to be supported so have attempted to minimise impact.
Does this help?
Regards

**Ms Kal Kamboh**
Principal Officer
Transport Development Control

**September 2018**

Hi Natalie,
Thanks for sending over the data results for this site.
For 85th percentile speeds of 44mph, I would be seeking sightline distances of 120m from a setback point of 2.4m. Sightlines should be achievable over land either in the applicant's control or over land that is highway. I believe you have a plan showing the extent of highway. The sightlines should be measured to a point 1m from the nearside edge of the carriageway.

I trust that helps

**Ms Kal Kamboh**
Principal Officer
Transport Development Control

**County Archaeologist, ESCC – June 2018**

Dear Natalie

Land at The Plough, Plumpton Green
The site does not contain any designated heritage assets and there are none in the immediate vicinity.
The site is not within an Archaeological Notification Area and there are no recorded archaeological finds from within its boundary. However this may reflect a lack of past archaeological research in this area. In the wider landscape we have evidence for landuse, settlement and activity from at least the Roman period onwards.
The site therefore has an undefined archaeological potential and in line with section 128 of the NPPF should be subject to fieldwork assessment prior to a planning decision being made.
- Amber

Kind regards

**Greg Chuter MA, MCIFA**
County Archaeologist
Environment Advice Team,
Communities Economy and Transport

## County Ecologist, ESCC – June 2018

Dear Natalie

I have the following comments.

**Plumpton**

- The site is not covered by any designations for its nature conservation interest, but there is a designated Wildlife Verge on St Helena Lane (opposite side of the road). The verge is designated for its unimproved neutral grassland. This may have an impact on works to improve visibility for access. There should be no encroachment into the verge.
- There are local records of notable and protected species, most notably a bat roost at St Helena Farm plus notable invertebrates and vascular plants from the site and surrounding area.
- Any development would need to be informed by an Ecological Impact Assessment with appropriate mitigation, compensation and enhancement agreed.
- Overall RAG assessment AMBER.

Kind regards

Kate

**Dr Kate Cole MCIEEM**
County Ecologist
Environment Team

## Rights of Way & Countryside, ESCC – June 2018

Dear Natalie,

Thanks for your email below, which Chris has forwarded to my Team for comment.

As you've noted, the Plumpton site has a public footpath running through it (see the attached Plan 1.)

In regards to that proposal, we would see a diversion order under Section 257 of the Town and Country Planning Act as necessary and would expect the Planning Authority to make and process that order. We would also emphasise the need for early discussions with my Rights of Way concerning the footpath if these plans are taken forward.

If you have any questions, please let me know.

Best regards,

Andy

**Andy Le Gresley**
Team Manager
Rights of Way & Countryside

**APPENDIX D – 2018 Speed Survey data**

eastsussex.gov.uk

East Sussex County Council

# Transport Monitoring Team

## Speed Survey for Natalie Carpenter Lewes District and Eastbourne Borough Councils September 2018

For further information regarding the commissioning of all types of transport surveys please contact:

Penelope Bentley – Transport Monitoring Team Manager

Transport Monitoring Team,
East Sussex County Council,
Communities, Economy & Transport Department, County Hall,
St. Anne's Crescent, Lewes, East Sussex, BN7 1UE

Tel: 01273 482248
Email: penelope.bentley@eastsussex.gov.uk

**Area Surveyed:**

Our ref: A5501

Grid Ref: 536502.117930

**Monitoring Period: 11to 19 September 2018**

**Methodology:**

The survey was carried out using a Speed Detection Radar (SDR), attached to a post at the location.

**Results:**
The volume and speed of traffic were recorded and the results are displayed as summaries.

The average 85th percentile speed over twenty four hours was recorded as:

| | | |
|---|---|---|
| A5501 | southbound | 45 miles per hour |
| | northbound | 44 miles per hour |

*The 85th percentile speed is the speed at, or below, which 85 percent of the traffic is travelling, or viewed another way, the speed that only 15 percent of drivers exceed.*

---

The average speed over twenty four hours was recorded as:

| | | |
|---|---|---|
| A5501 | southtbound | 36 miles per hour |
| | northbound | 37 miles per hour |

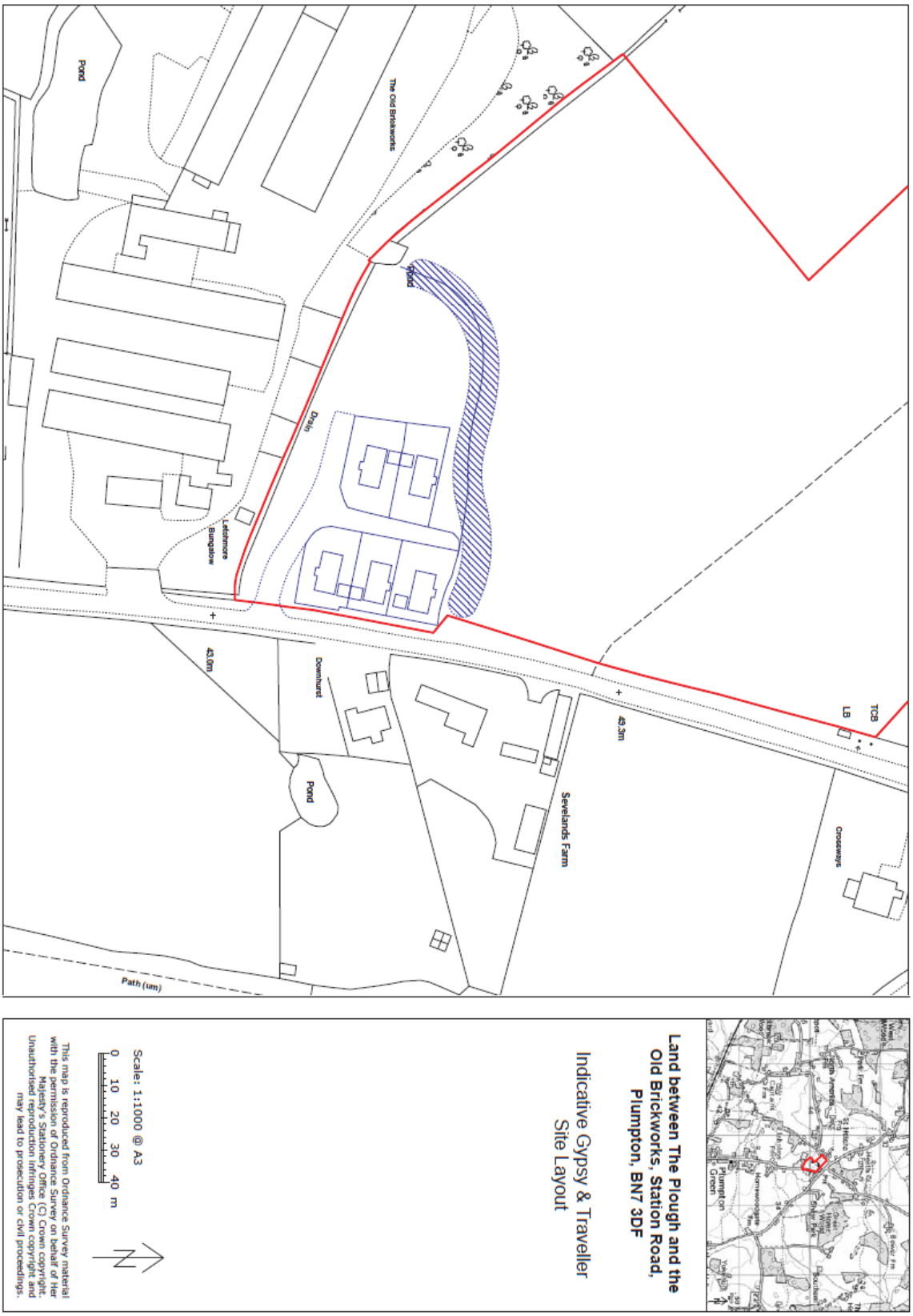
*The average speed is the speed at, or below, which 50 percent of the traffic is travelling, or viewed another way, the speed that only 50 percent of drivers exceed.*

East Sussex County Council's Transport Monitoring Team carries out a range of transport surveys including:

- Manual Volumetric Counts
- Automatic Volumetric Counts
- Journey Time Surveys
- Radar Speed Surveys
- Bus Time Surveys
- Speed Gun Surveys
- Pedestrian Counts
- Roadside Census Interviews
- Passenger Counts
- Cycle Surveys
- Parking Surveys
- Video Surveys

Historical data is available from numerous sites across East Sussex.

## APPENDIX E - Indicative layout of proposed GT01 site allocation



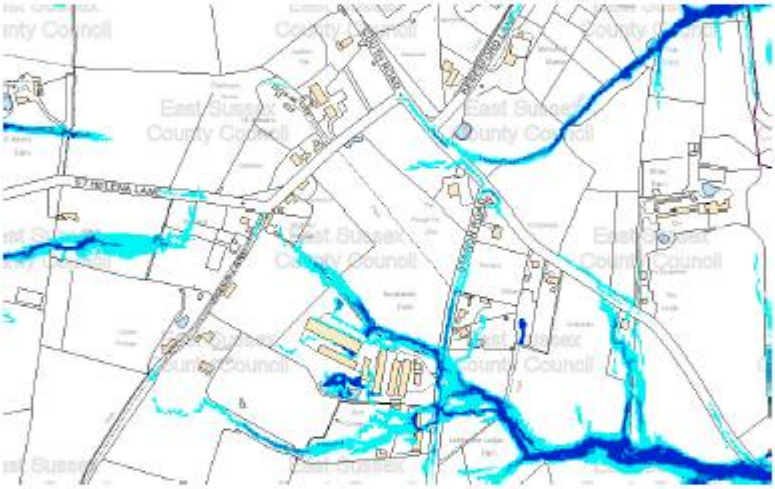
## APPENDIX F - Extract from ESCC's flood risk and drainage report

Surface Water Flood Risk

The Environment Agency's surface water flood mapping shows the predicted surface water flood risk at the development site, and the table below gives the corresponding maximum flood depth:

**Table 1: Surface Water Flood Depths**

| Flood Event | Maximum Depth |
|---|---|
| 3.33% AEP (1 in 30 year) | 0.20 |
| 1% AEP (1 in 100 year) | 0.25 |
| 0.1% AEP (1 in 1000 year) | 0.53 |



3.33% AEP Extent | 1% AEP Extent | 0.1% AEP Extent



**Figure 2: Surface Water Flood Risk**

There is a major overland flowpath at this site; however this is likely to be associated with the ordinary watercourse. The proposed site layout and levels should consider surface water flood risk to ensure that flood risk is not created on or off-site.

Further information can be viewed online on at the Environment Agency's pages on the GOV.UK website.

## APPENDIX G – Glossary

| Term | Definition |
|---|---|
| **Gypsy and Traveller** | "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." *(as defined in Annex 1 of 2015 Planning policy for traveller sites, DCLG[4])* |
| **Permanent site** | Where caravans can be located all year round, as opposed to transit sites where caravans can be stationed on pitches for up to 3 months, or other specified length of time. Pitches can be provided, and managed, by local authorities or privately owned. |
| **Pitch** | Defined area of land on a site/ development general home to one licensee household. Can vary in size but should be able to accommodate one static caravan, one touring caravan and one vehicle. |
| **Transit site** | Where caravans can be stationed for a fixed period of time, usually up to 3 months unless otherwise agreed with the relevant management company. |
| **Travelling Showpeople** | 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. *(as defined in Annex 1 of 2015 Planning policy for traveller sites, DCLG)* |
| **Unauthorised Encampment** | Residing in caravans/ trailers on private/ public land without the landowner's permission. |

[4] 2016 GTAA was prepared under the previous definition which included Gypsies, Travellers and Travelling Showpeople that have ceased to travel *permanently,* as well as temporarily.