

STAGE 2 – QUESTIONS GYPSY AND TRAVELLER PROVISION

AQ22. Does the additional gypsy and traveller evidence paper provide reassurance that the selection of sites at Treasbeare and Cobden's are:-

- **appropriate allocations;**

With regard to paragraph 6.4, the Council have concluded that the two sites allocated for Gypsy and Travellers are well sited in respect of noise avoidance by quoting:

'though the more easterly site, at Cobdens, will potentially need setting back from London Road to ensure adverse noise impacts are not experienced from the adjacent road...The physical site size allocated at Cobdens is, however, such that this not considered to be a major problem'.

How can the Council be sure that the noise levels from London Road will be acceptable? Have they had a noise assessment commissioned? Furthermore, no regard has been given to the amenity of my clients properties both at Little Cobden and Bodley Bridge directly adjacent; what about the potential adverse noise impacts that will be experienced by these longstanding residential properties? What assessments have the Council undertaken to ensure established residents will not be impacted by 10 concentrated Gypsy and Traveller pitches all in one location?

One of the Council's justifications for the proposed CB4 Gypsy and Traveller site is that they consider it will be less prominent in landscape terms in this location which already has a high landscape sensitivity compared to 'bricks and mortar housing'. In the sustainability appraisal they go on to say that:

'Gypsies and Travellers may need to move larger vehicles on and off site, often for business purposes on a regular basis'.

Regardless of the existing landscaping that is in place, the CB4 Gypsy and Traveller site would define the entrance to the town and therefore would result in the site being the first form of development any passers-by would see when they enter the town of Cranbrook from this end of the old A30 (London Road). The urban gateway into a town is an important entrance feature and should be given due consideration as such. Locating the CB4 Gypsy and Traveller site at the far eastern end of the Cranbrook Plan Area/allocations boundary goes against good urban design principles and would not provide an attractive gateway into the new Cranbrook Town for people approaching east to west from the old A30 (now London Road). Furthermore, the large vehicles, caravans and ancillary equipment that comes with Gypsy and Traveller sites would have an adverse landscape impact on the attractive open landscape in this location.

- **justified by available evidence when considering reasonable alternatives and**

The Council still quote the Gypsy and Traveller accommodation needs study (GTAA) which was completed in 2015 albeit this is now circa 6 years old. In paragraph 2.3 the Council state that:

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'as part of the Cranbrook related work, conversations with the gypsy and traveller community reported that finding suitable accommodation has worsened in recent years and at January 2020 there is a necessity to allocate 28 permanent pitches in East Devon'.

As alluded to in our initial representations, EDDC set out that the accommodation need from 2014 to 2019 was based on survey responses and it is now unclear where they have derived the need for 28 permanent pitches from as of January 2020? They said in the previous GTAA that:

'the need identified is likely higher than the actual need on the ground and that the real need in East Devon is unknown in the absence of records of unauthorised encampments or a G&T forum'.

The latter is a contradiction as now it is said that the Council undertook a consultation with Gypsy and Travellers as part of the Preferred Approach consultation but having reviewed the summary of discussions it is unclear how the need for 28 pitches has been derived.

As stated in paragraph 2.3, there is now:

'a necessity to allocate 28 permanent pitches in East Devon to meet the outstanding identified need, 16 of which are needed immediately'.

To allocate 15 of these district wide pitches in the Cobdens Expansion Area seems disproportionate as essentially CB4 will be taking 54% of the District's overall need in one go. Has the expansion of existing Gypsy and Traveller Sites outside of the Cranbrook Plan area been assessed alongside the release of brownfield land before Greenfield land? It doesn't appear so from the updated SA and this is further discussed below.

It is acknowledged at paragraph 3.7 that the developer consortium for the current build out of the town signed a statement of common ground with East Devon to:

'include a site or sites suitable for 30 gypsy pitches within the expanded area of Cranbrook'.

The proposed CB4 Gypsy and Traveller site is actually located on the eastern extremity of the Cranbrook Plan Area and its allocation boundary. Furthermore, part of the site actually falls outside of the proposed 'CB8 Built up Area Boundary' and therefore shows no thought to prospective integration within the Cobden Expansion Area and therefore in its current location will be out on a limb compared to the 5 pitches to be located in CB3.

With regard to paragraph 4.3 of the supplementary evidence paper, what is:

'the current scale of the resultant settled community in Cranbrook'?

This is paragraph is a bit vague as the GTAA previously quoted that the:

'real need in East Devon is unknown'.

What has changed between the 2015 work and January 2020 for the Council to be adamant that the *'identified need of 28 pitches'* is in fact a reality?

Review of the SA update in respect of policy for gypsies and travellers

Having undertaken a review of the sites assessed in the SA and the Council's updated commentary in respect of the sustainability and scope for accommodating a Gypsy and Traveller site, it is clear there are other sites suitable alongside the Council's chosen 'Site K'.

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We question the robustness of the 'SA appraisal of Alternative Site Development Options' (section 10) as it is not clear why Site K (CB4) has been chosen as the preferable site for Gypsy and Traveller's over and above sites A1, B3, C, G, M, N and T (south west corner only) which were also, in principle, all deemed suitable sites and scored positively in terms of site suitability. However, in all cases the Council's fundamental reason for dismissing them was because they are:

'small sites where it is unlikely that a landowner would wish to bring the site forward for gypsy and traveller use and they are more likely, instead, to hold out for bricks and mortar residential values'. This reason for discounting the sites is purely speculative and therefore considered biased because no evidence that any landowner discussions have taken place has been referred to or presented by the Council as part of the sequential assessment.

- **in accordance with National Policy?**

We maintain that the proposed 10 pitches within Cobden CB4 does not accord with the NPPF. As previously stated the NPPF acknowledges that policies should *'optimise the potential of sites to accommodate development'* and therefore in this context a review of the functioning of existing gypsy and traveller sites should be undertaken before allocating new, edge-of-settlement sites that encroach into the open countryside. As part of the sequential exercise, brownfield sites should have been considered before the release of any greenfield land.

AQ23. Does the final report [PSD27] justify the level of provision (15 pitches) across the two sites at Cranbrook?

The Council state in paragraph 4.3 that:

'the provision of 15 pitches at Cranbrook will meet just over half of the identified need of 28 pitches and fulfil almost all of the immediate need for 16 pitches in East Devon'.

There is no explanation within the updated SA how the figure of 16 has been derived and therefore is not adequately explained.

AQ24. Can EDDC clarify the significance of the agreement with East Devon New Community Partners in respect of Gypsy and Traveller allocations at Treasbeare and Cobden's. [Council]

No comment