

THE CRANBROOK PLAN

Examination
Gypsy and Traveller Provision
Question AQ22-26

September 2020

JBB8781
The Cranbrook Plan

30 September 2020

1.1 AQ22. Does the additional gypsy and traveller evidence paper provide reassurance that the selection of sites at Treasbeare and Cobden's are:- appropriate allocations; justified by available evidence when considering reasonable alternatives and in accordance with national policy?

- 1.1.1 In Persimmon Homes South West (PHSW) January 2020 Matter 2 Statement, the point was made that the Sustainability Appraisal (SA) did not appraise any alternative pitch provision in terms of numbers of pitches against the preferred sites, or of any alternative sites, as a basis for preferring the proposed allocation of 10 pitches at Cobden (and 5 at Treasbeare). There was also no supporting site-specific selection evidence sitting outside the SA and so it is unclear how the SA, or site selection process, had informed the final choice of pitches assigned to Cobden in relation to its site and number of pitches proposed.
- 1.1.2 Additionally, it was unclear as to the evidential basis for why the Bluehayes site should be relocated from the Preferred Options version of the Cranbrook Plan whilst the Cobden site should remain broadly 'in-situ', nor why 10 pitches are appropriate in Cobden and not elsewhere in the Cranbrook area in other potential locations that are or will be accessible to local facilities and services. Specifically, criticism was made of the 'Alternatives' section within the SA [Cran 57] (Table 6.11 – page 89) which merely looked at typologies of sites (in terms of size) and an unspecified off-site location.
- 1.1.3 The Council's response has been PSD27. Paragraph 5.2 states: *Following on from discussions at the Cranbrook Plan hearing sessions the SA has been updated to more fully address consideration of sites for accommodation of gypsies and travellers. Appendix 2 to this paper explains the scoring system used in the SA work and Appendix 3 forms a proposed update to the SA.*
- 1.1.4 Para 6.1 to 6.8 provides some reasoning from the Council for the allocation of GTS provision at Cobdens and Treasbeare. Whilst this text is limited and highly subjective, it does at least provide some narrative which was missing from the previous work on GTS site selection. Similarly, the plan on page 38 now provides an indication of the locations which the Council has assessed.
- 1.1.5 Whilst some allocation areas on this plan have been subdivided, there appears however, to have been limited attempt to assess potential locations within certain other areas (A1/B1/B2 etc), based on the tables supporting the selected sites, found at pages 39-67. This provides the Council's SA assessments against each of the SA Objectives and supporting commentary. What would have been helpful and is common-place for SA's when looking at alternatives, is for a summary table which provides summaries of all of the Council's assessments alongside each other, so readers of the SA are able to easily understand why one site is preferred against another. It is regrettable this hasn't been done.
- 1.1.6 For the benefit of the examination process, RPS has therefore, prepared a summary of findings on the SA undertaken for individual site options based on a straightforward ranking to allow sites to be compared against one another. This is appended to this statement (**Appendix A**).
- 1.1.7 The summary at **Appendix A** indicates within the Cobdens Expansion Policy CB4 area and based on the Council's assessment that the Council's preferred location, Area K is comparable to the other Cobdens locations assessed and on that basis and the support of the assessment at para 6.1 to 6.8, the Council's explanation for favouring Area K is understood and therefore provides justification for its favoured location.

- 1.1.8 However, **Appendix A** clearly shows that the favoured GTS Allocation at Cobdens location (K) performs no better or in some instances worse as a suitable GTS when considered against the Council's assessment of 18 other sites and locations across the Cranbrook Plan area. This would appear to indicate the GTS allocations do not follow the evidence.
- 1.1.9 The supporting commentary in PSD27 under each of the site appraisals indicate a large number of potential GTS sites being discounted as being 'too small' to be selected. RPS has considered the validity of this claim and sets out a summary table (**Appendix B** to this statement) which lists those sites quoted in the updated SA (PSD27) as being 'too small' or where site size is a factor in justifying their exclusion. However, as can be seen all these sites are in excess of 0.5 hectares, some significantly, which the Council's own evidence (PSD27 page 35) indicates is an 'appropriate minimum size' for sites able to accommodate 10 pitches. It is clear therefore that sites of 0.5 hectares or more should not be considered too small and should therefore not be excluded for that reason.
- 1.1.10 It is also important to highlight that, in many cases, the Council cites the lack of willingness of a landowner to bring forward sites for gypsy and traveller development because of their apparent small size which therefore justifies their exclusion. Such reasons are quoted for all the sites listed in Appendix B. However, irrespective of site size there is no mention in the updated commentary on suitability regarding the landowner preferences for the preferred sites as is the case for all the other excluded sites. On this basis, there is clear lack of consistency in the Council's approach across the sites in terms of the justification for choosing at Area K ahead of other alternatives.
- 1.1.11 Consequently, there still appears to be a lack of evidence within the SA process which clearly explains the reasons for selecting the preferred site(s), when considered against reasonable alternatives. Consequently, RPS does not consider the chosen allocations (in particular Area K) to be appropriate based on the findings of the updated SA exercise when compared to other reasonable alternatives.

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

- 1.2.1 PSD27 (para 2.3) notes that as part of the Cranbrook related work, conversations with the gypsy and traveller community reported that finding suitable accommodation had worsened in recent years. This evidence should be published in full for the purposes of the Examination but has not been. It indicates from this that as at January 2020 there is a necessity to allocate 28 permanent pitches in East Devon to meet the outstanding identified need, 16 of which are needed immediately. There is also a Devon-wide need to find 4-5 emergency stopping places/transit sites, although it is not proposed that this demand be met at Cranbrook. Given the statement in PSD27 on need, PHSW would expect the detail underpinning this statement to be made clear. This is not the case, so there appears limited justification for the overall scale of need identified.
- 1.2.2 Similarly, the provision of 10 pitches out of a total of 15 across Cranbrook is disproportionately provided for at Cobden's expansion area (CB4). It is noted that the adopted EDLP identified the need for 30 pitches at Cranbrook up to 2031 (in Strategy 12) but this policy is proposed to be superseded and did not, in any case, specify precise allocations or locations within the Cranbrook development.
- 1.2.3 Given that the Council now intends to allocate four separate expansion areas through the Plan, rather than rely solely on the two strategic allocations originally allocated in the adopted EDLP, PHSW cannot see any credible reason as to why Cobden Expansion Area (CB4) should be

targeted, disproportionately, by taking two-thirds of the total provision, for three broad reasons. Firstly, in this regard, PHSW draw the Inspector's attention to paragraph S37 of the Devon Partnership Gypsy and Travellers Needs Assessment (2015), which states that, "...According to the survey undertaken with Gypsies and Travellers in the study area the preferred size for permanent/residential sites is for small, family sized sites. The stakeholder meetings undertaken as part of the GTAA confirmed that smaller sites are preferred..." (emphasis added).

- 1.2.4 Secondly, consistent with our response to question AQ22, reference is made in the updated SA to the Gypsy and Traveller Site Design and Layout SPD (under 'Key Considerations in respect to sites for gypsy and traveller accommodation' on page 35, point d.) which clearly identifies sites of 0.5 hectares being adequate to meet the need for 10 pitches.
- 1.2.5 And thirdly, the commentary (at point g.) goes on to make reference to gypsy and traveller community preferences with respect to location but provides no additional update on preferences in terms of the size of site preferred by the travelling community to meet specific family-sized needs.
- 1.2.6 Consequently, PHSW considers that the identification of Area K for gypsy and traveller accommodation is contrary to the Council's own guidance as well as the expressed wishes of the local traveller community themselves on site size. On this basis, it remains unclear as to the justification for allocating just two sites; one for 5 pitches and the other (at Cobden) for 10 pitches, as opposed to other smaller sites of similar size, as being the most appropriate means to address local need for additional pitches in Cranbrook.

1.3 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]

- 1.3.1 Whilst it is noted that this question has been posed only to the Council.
- 1.3.2 PHSW simply wish to make it clear that it is in no way seeking to make the case that GTS provision, should not occur at Cranbrook, it is however, making the case that the Councils own evidence does not justify the preferred locations.

Policies map

AQ25. Fig1 in the Land Budget Technical Note indicates additional SANGS land shown pink but makes other alterations including the omission of the sports pitches it also incorporates white land between the additional SANGS allocation and that formerly indicated for sports pitches and similarly land around the allocation for the Gypsy and Traveller allocation. Please clarify the anomalies. [Council]

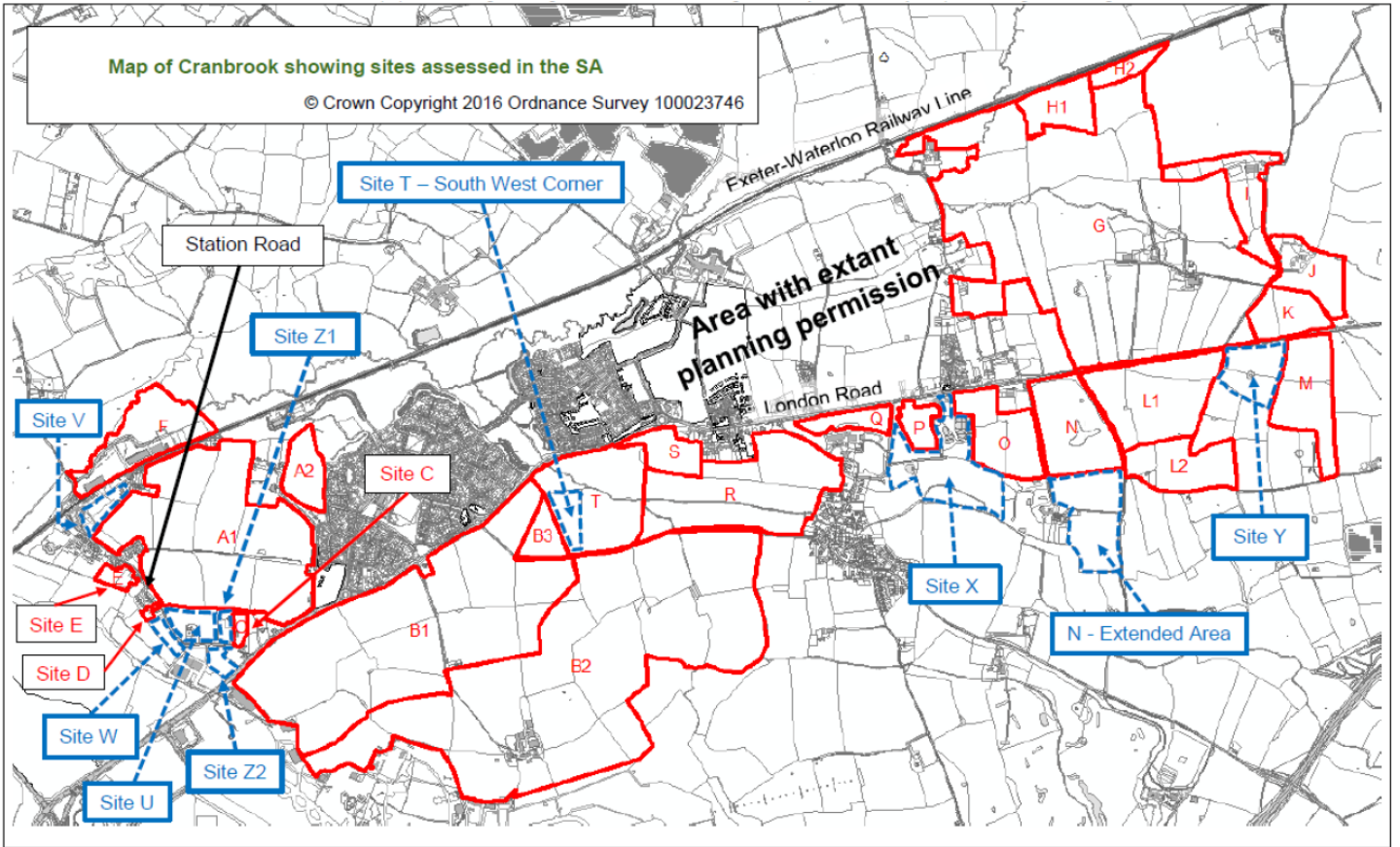
- 1.4 **AQ26. I note that the land assessed in the parcel plan for Bluehayes and Treasbeare do not fully reflect the submitted policies map. Could the Council clarify which is the current position? [Council]**

Appendix A

Cranbrook Plan - Summary of SA findings (in response to PSD27) - Ranking

Site Ref	Number of Scores Assigned to Each Measure						Net score
	(+ / +)	(+)	0	(-)	(- -)	(? -)	Rank
C	2	8	7	3	0	0	7
L1	0	8	11	1	0	0	7
O	0	8	11	1	0	0	7
V	0	8	11	1	0	0	7
Y	0	8	11	1	0	0	7
B2 only	6	4	6	3	0	1	6
B3	6	4	6	3	0	1	6
I	0	8	10	2	0	0	6
L2	0	8	10	2	0	0	6
M	0	8	10	2	0	0	6
N	0	8	10	2	0	0	6
N (ext.)	0	8	10	1	1	0	6
P	0	8	10	2	0	0	6
A1	6	4	5	2	1	2	5
B1 only	6	4	5	2	1	2	5
G	6	4	5	2	1	2	5
H1	0	7	11	1	0	1	5
J	0	8	9	2	0	1	5
K	0	8	9	2	0	1	5
U	2	5	11	2	0	0	5
Z1	2	5	11	2	0	0	5
D	2	5	10	3	0	0	4
E	2	5	10	3	0	0	4
H2	0	7	10	2	1	0	4
Q	0	7	10	2	1	0	4
R	0	7	10	1	2	0	4
S	0	7	10	1	1	1	4
T (swc)	0	6	12	1	0	1	4
W	2	5	10	3	0	0	4
X	0	7	10	2	1	0	4
Z2	2	5	10	3	0	0	4
T (no swc)	0	6	10	1	2	1	2
B1+B2	4	4	5	3	3	1	1
F	0	3	10	6	1	0	-4

NB: Sites in **bold** are the proposed allocations (Area K and T)



Appendix B

Cranbrook Plan – Sites excluded for reasons of Size (ha)

Site ref	Site Size (ha)	Site >0.5ha?
C	0.6	Y
E	0.9	Y
F	5.6	Y
I	6.4	Y
J	5.2	Y
N	9.1	Y
O	7.1	Y
Q	2.3	Y
S	>0.5	Y
U	1.7	Y
W	0.7	Y
X	9	Y
Y	4.5	Y
Z1	0.8	Y
Z2	0.9	Y