

# **Traveller Sites Allocations Development Plan Document**

**Consultation Draft – August 2014**



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This document is formatted for double sided printing



## Introduction and background

Gypsies are believed to have arrived in the UK over 500 years ago. The Gypsy and Traveller community is very diverse and hard to define in simple terms. The main cultural groups include Romany Gypsies, Irish Travellers and New Age Travellers. Traditionally, Gypsies and Travellers made a living travelling around the country for employment, often seeking seasonal work opportunities. However as traditional stopping places have been lost, the travelling lifestyle has become increasingly difficult. Nationally around two thirds of Gypsies and Travellers now live in bricks and mortar housing with those actively travelling decreasing.

Gypsies and Travellers are an often marginalised group that suffer a high level of inequality, particularly around issues such as life expectancy, health and education and are a group at high risk of facing discrimination and racial hatred. Mid Sussex District Council is committed to developing sustainable communities that are safe, healthy and inclusive and to provide the amount and type of housing that meets the needs of all sectors of the community<sup>1</sup>, including Gypsies and Travellers. The *Traveller Sites Allocations Document* has been written in the context of delivering the *Vision for Mid Sussex*<sup>2</sup> and the priority themes that support this.

An assessment of the accommodation needs of Gypsies and Travellers and Travelling Showpeople has been made through the *Mid Sussex Gypsy and Traveller Accommodation Assessment*. This sets out that the required site provision for Gypsies and Travellers required for Mid Sussex (outside of the South Downs National Park<sup>3</sup>) for the period up to 2031 is 34 pitches, with no identified requirement for Travelling Showpeople.

Providing sufficient, suitable permanent accommodation for the district's Gypsy and Traveller community will not only meet identified needs, but also contribute towards a better quality of life, promoting the opportunity for better integration and co-existence with the settled community and help to reduce unauthorised encampments that can cause distress to both of these communities and are costly in terms of enforcement action, clean-up costs and preventative measures.

The *Traveller Sites Allocations Document* is required to address the need for permanent Traveller sites in Mid Sussex. This Document represents a positive, plan-led approach to meeting the existing and future need for Traveller accommodation in the district for the period up to 2031. This Consultation Report contains two draft policies. The first, (TSAD 1) proposes to safeguard existing authorised Traveller sites with permanent planning permissions to ensure that identified needs are not made worse by the loss of these sites to alternative uses, without a suitable replacement being made. The second draft policy (TSAD 2) proposes a number of potential locations that could be allocated as permanent Gypsy and Traveller sites within the district. These sites have been identified through the *Mid Sussex Gypsy, Traveller and Travelling Showpeople Sites Study*.

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<sup>1</sup> Mid Sussex District Council Housing Strategy for Mid Sussex 2009-2014 (including the Refreshed Housing Strategy 2012-2014) and Gypsy and Traveller Strategy 2009-2012)

<sup>2</sup> The vision for the District is set out in the Mid Sussex Sustainable Communities Strategy – available at [www.midsussex.gov.uk](http://www.midsussex.gov.uk)

<sup>3</sup> It should be noted that this document is only covers the area of Mid Sussex outside of the South Downs National Park, as Mid Sussex District Council is not the local planning authority for this area.



## Consultation

This document seeks your views<sup>4</sup> on the draft policies and proposed sites to meet the need for permanent Gypsies and Traveller accommodation.

This document will be reviewed in light of the responses received, so it does not represent final Council policy. The final decision on the policies and the sites that will be proposed for allocation when the document is submitted to the Secretary of State, will be made by elected Councillors, based on evidence that will include representations made to the public consultation, and further evidence collected during public consultation. The process will also include the assessment of any reasonable alternative sites submitted during public consultation and any further potential sites identified since the publication of the *Draft Traveller Sites Study*. Before any site is allocated, the document is also required to be formally assessed at an independent examination.

### How to make comments and submit site information

Public consultation on the *Traveller Sites Allocations Document – Consultation Draft* and its accompanying *Sustainability Appraisal Report* and Habitats Regulations Assessment Screening Report will run for six weeks from 8<sup>th</sup> August until 19<sup>th</sup> September 2014.

We would like as many people as possible to have their say about any aspect of this document; however, views are particularly sought on a series of short questions set out in this document, which are reproduced in the Council's consultation response form. Please do not feel obliged to answer every question asked, as your input is valued no matter how many questions you answer.

All the documents are available on-line at [www.midsussex.gov.uk/8686.htm](http://www.midsussex.gov.uk/8686.htm), and along with the response form, are available to view at all Town and Parish Council offices, public libraries and help-points in Mid Sussex and at the District Council offices main reception. Address details of where the documentation can be viewed are set out in Appendix A.

Where possible, responses should be made on-line at [www.midsussex.gov.uk/8686.htm](http://www.midsussex.gov.uk/8686.htm) otherwise comments can be made on the response form, or by email to [LDFconsultation@midsussex.gov.uk](mailto:LDFconsultation@midsussex.gov.uk) or by post to:

Planning Policy and Economic Development  
Mid Sussex District Council  
Oaklands Road  
Haywards Heath  
RH16 1SS

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<sup>4</sup> Under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012

As the document seeks to allocate sites, it is also open for those who wish to promote a site for consideration, either now or in the future, to submit their site. Potential sites must be accompanied by a site map clearly showing the boundaries of the site and supported by evidence of the suitability, availability and deliverability<sup>5</sup> of the site for such use. These can be submitted online at [www.midsussex.gov.uk/8686.htm](http://www.midsussex.gov.uk/8686.htm) or by post or email using the above contact details.

**Please send your responses to us by 19<sup>th</sup> September 2014.** This will enable us to consider your responses in shaping the *Traveller Sites Allocations Document*. All comments received will be public information.

**Mid Sussex District Council will only consider comments by respondents who provide their names and address. Offensive or racist comments will not be accepted and may be reported to the appropriate authorities.**

To find out more about the *Traveller Sites Allocations Document* you can visit our website or call the Planning Policy Team on (01444) 477053. Please contact us if you have particular access needs or require help in completing the comments form.

Further detail of the consultation process is set out in the accompanying *Community Involvement Plan* available at [www.midsussex.gov.uk/8686.htm](http://www.midsussex.gov.uk/8686.htm) and at all the consultation drop in points detailed in Appendix A.

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<sup>5</sup> See *Planning policy for traveller sites*(DCLG) - [www.gov.uk/government/publications/planning-policy-for-traveller-sites](http://www.gov.uk/government/publications/planning-policy-for-traveller-sites)



## Planning for future needs

The Government's aim for fair and equal treatment of Gypsies, Travellers and Travelling Showpeople is reflected in national planning policy, *Planning Policy for Traveller Sites (2012)*. This should be read in conjunction with the *National Planning Policy Framework* and *National Planning Policy Guidance*, and must be taken into account as a material consideration by local planning authorities when preparing their development plans and making planning decisions for Traveller sites.

For the purposes of the planning system<sup>6</sup>:

'Gypsies and Travellers' means:

*"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 or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such."*

'Travelling Showpeople' means:

*"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 or permanently, but excludes Gypsies and Travellers as defined above."*

The *Policy* aims to achieve equal treatment for Gypsies, Travellers and Travelling Showpeople in a way that facilitates their traditional and nomadic way of life, while respecting the interests of the settled community and contributing to the achievement of sustainable development.

The *Policy* requires local planning authorities to establish needs and to identify specific 'deliverable' sites sufficient to provide five years' worth of supply against a locally set target, and a 15 year supply of such sites where possible. This requirement is similar to the National Planning Policy Framework approach to the provision of bricks and mortar housing, where the lack of such a supply "*should be a significant material consideration in any subsequent planning decision when considering applications for the grant of temporary planning permission*".

The emerging *District Plan* will include a criteria based policy for determining planning applications on Gypsy and Traveller sites, and to guide the allocation of new sites; and extensions to existing sites. The policy will also set out a target for the number of permanent pitches to be met through the *Traveller Sites Allocations Document*.

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<sup>6</sup> See *Planning policy for traveller sites(DCLG)* - [www.gov.uk/government/publications/planning-policy-for-traveller-sites](http://www.gov.uk/government/publications/planning-policy-for-traveller-sites)

## Understanding the district's needs

Romany Gypsies and Irish Travellers are covered by the protected characteristic of race for the Equality Act 2010. Local authorities have a duty under the Equality Act to actively seek to eliminate unlawful discrimination, advance equality of opportunity and promote good race relations. The Council has a statutory duty<sup>7</sup> to undertake regular assessments of the accommodation needs of Gypsies and Travellers either living in, or resorting to their area; and to include the needs of Gypsies and Travellers in its housing strategies.

An assessment of the accommodation needs of Gypsies, Travellers and Travelling Showpeople has been made through the *Mid Sussex Gypsy and Traveller Accommodation Assessment (GTAA)*<sup>8</sup>. This is calculated by comparing the current supply of pitches available for occupation against the current and future needs of the households. The GTAA calculates the district's needs for years 2013 to 2031 (outside of the South Downs National Park) as 34 Gypsy and Traveller pitches with no identified requirement for Travelling Showpeople.

Much of the requirement for Gypsy and Traveller sites, particularly within the next five years, is to address the backlog of needs for households on the waiting list for public sites (a net total of 8 pitches). In addition, there are 2 households (occupying a total of 2 pitches) who will see their temporary planning permissions expire within this time period. The remaining requirement is from household growth caused by existing on-site households; and accounting for growth from households currently on the waiting list (24 pitches).

Table 1 – Total required pitches 2013-2031

Time period	Number of pitches
2013 – 2017	15 pitches
2018 – 2022	6 pitches
2023 – 2027	7 pitches
2028 – 2031	6 pitches
<b>Total</b>	<b>34 pitches</b>

### What is a pitch?

Gypsy and Traveller sites are made up of a number of pitches and associated facilities. There is no national definition of what size a pitch should be but national guidance states that *“an average family pitch must be capable of accommodating an amenity building, a large trailer and touring caravan...drying space for clothes, a lockable shed...parking space for two vehicles and a small garden”*. On average, sites usually contain approximately 1.7 caravans per pitch.

<sup>7</sup> Under section 225 of the Housing Act 2004

<sup>8</sup> This is a joint commission between Mid Sussex District Council and the South Downs National Park Authority undertaken by consultants Opinion Research Services/ Peter Brett Associates. It was published in 2013 and updated in 2014. It forms part of the evidence base for the Mid Sussex Local Development Framework and for the South Downs National Park Authority Local Plan.

## How sites have been identified

In order to identify potential sites the Council undertook a *Traveller Sites Study* to look at all reasonable options for development as Gypsy and Traveller accommodation.

162 sites were assessed for their potential and likely timescale for development. In the main, these were known sites, already within the Council's *Housing Supply Document*. The process included a 'call for sites' and a request to all the district's Town and Parish Councils to submit sites within their areas that might be suitable.

Each site has been assessed using a two stage approach in accordance with the methodology<sup>9</sup> set out in Appendix B. Stage 1 assessment removed those sites subject to clear availability, policy or physical constraints. Stage 2 assessed the remaining sites in more detail. The optimum recommended size of a Gypsy and Traveller site is 10–12 pitches and the capacity of larger areas of land was assessed accordingly.

Following assessment 6 potential sites met the criteria and were shortlisted for consideration at Stage 2. The vast majority of sites were ruled out on the grounds of availability whilst suitable road access and initial viability assessments were the other main factors. This serves to highlight the difficulty in identifying feasible development options for such use, particularly against the backdrop of competing high value uses such as residential housing development. As a result, difficult decisions have to be taken in order to meet the identified need and to adopt a proactive approach to provision.

Two shortlisted locations have been identified as suitable for allocation as permanent Gypsy and Traveller accommodation. The locations are *Land to the north and northwest of Burgess Hill (two sites of 12 pitches each as part of the Northern Arc mixed use strategic allocation)*; and *Land at Imberhorne Lane Nurseries, Imberhorne Lane, East Grinstead (one site of 12 pitches)*. These two locations could deliver a total of up to 36 pitches and adequately meet the total identified need as set out in the 2014 GTAA Update as well as facilitating a five-year supply of pitches.

The *Mid Sussex Traveller Sites Study* is available to view at [www.midsussex.gov.uk/8686.htm](http://www.midsussex.gov.uk/8686.htm) and at all the consultation drop-in points detailed in Appendix A.

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<sup>9</sup> The methodology was agreed by the Traveller Policy Member Working Group and reported to the Scrutiny Committee for Planning and Economic Development 14 January 2014

## Habitats Regulations

All the shortlisted sites considered at Stage 2 of the Mid Sussex Traveller Sites Study have been assessed by an accompanying *Habitats Regulations Assessment Screening Report* to evaluate whether there are any likely significant effects on European-designated nature conservation sites within relative proximity.

The *Screening Report* concludes there would be no likely significant effects on the Ashdown Forest Special Protection Area and Special Area of Conservation<sup>10</sup> from the majority of the shortlisted sites. Sites within the '7km zone of influence' may have a likely significant effect and need to be assessed further through an appropriate assessment. Based on the approach currently applied to new bricks and mortar housing, it is considered that such development will be required to provide or contribute towards mitigation measures. The *Habitats Regulations Assessment Screening Report* is available to view at [www.midsussex.gov.uk/8686.htm](http://www.midsussex.gov.uk/8686.htm) and at all consultation drop-in points detailed in Appendix A.

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<sup>10</sup> Special Area of Conservation (SAC) for species, plants and habitats (designated under the Habitats Directive) and Special Protection Area (SPA) for bird species (classified under the Birds Directive).

## Overall strategy and policies

This Document proposes two draft policies: *Policy TSAD 1 – Safeguarding Existing Authorised Traveller Sites* and *Policy TSAD 2 – Traveller Site Allocations*.

The draft policies should be read in conjunction with the Council's proposed approach of a criteria based policy within the emerging District Plan for the provision of permanent Gypsy, Traveller and Travelling Showpeople sites. The policy will set a target for the number of permanent pitches to be met through the Traveller Sites Allocations Document and the criteria for determining applications for new Gypsy and Traveller and Travelling Showpeople sites; and extensions to existing sites. This will provide a basis for decisions to determine applications for such use should they come forward. The proposed wording of the draft policy is set out in Figure 1.

Figure 1 – Proposed draft policy for emerging District Plan

***The Mid Sussex Gypsy and Traveller and Travelling Showpeople Assessment (2013 and 2014 update) identifies the need for permanent pitches and plots for the period up to 2031 as 34 additional permanent Gypsy and Traveller pitches with no identified need for Travelling Showpeople.***

***The Council will progress a site allocations Development Plan Document to allocate a sufficient provision of Gypsy and Traveller sites to meet identified needs within an appropriate timescale.***

***New Gypsy, Traveller and Travelling Showpeople sites, and extensions to existing sites, including transit sites, will be permitted provided:***

- ***The site or extension satisfies a clear local need, as evidenced by the Gypsy and Traveller Accommodation Assessment or the best available evidence;***
- ***The site is reasonably accessible to schools, shops, health and other local services and community facilities;***
- ***The development is located and designed to/ or capable of being designed to the recognised best practice standards to ensure good quality living accommodation for residents and that the local environment (noise and air quality) of the site would not have a detrimental impact on the health and well-being of the travellers;***
- ***The sites are compatible with neighbouring land uses, and minimise impact on adjacent uses and built form and landscape character;***
- ***In rural and semi-rural areas sites should not dominate the nearest settled community.***
- ***Any site within the 7km zone of influence around Ashdown Forest, will require an appropriate assessment under the Habitats Regulations to be undertaken and appropriate mitigation provided as required.***

***The provision of permanent Gypsy and Traveller sites will be monitored to ensure a suitable supply of such sites is provided at the appropriate time.***

## Draft Policy TSAD 1 - Safeguarding Existing Authorised Traveller Sites

The first draft policy seeks to protect existing Gypsy and Traveller sites from being developed for alternative uses whilst there is a need for such sites, as currently demonstrated by the *Gypsy and Traveller Accommodation Assessment (2013 and 2014 update)*.

The draft policy proposes that sites that have permanent planning permission for Gypsy and Traveller or Travelling Showpeople use, or are granted such permission in the future, will be safeguarded to ensure that the permitted use as a Gypsy and Traveller site is not lost to an alternative use, unless an alternative, replacement site has been identified and developed to provide facilities of an equivalent or improved standard (including its location), whilst there remains a need for such sites.

### Draft Policy TSAD 1 – Safeguarding Existing Authorised Traveller Sites

Existing Traveller sites will be safeguarded for Gypsy and Traveller<sup>11</sup> use:

- Fairplace Hill Caravan Site, Burgess Hill
- Bedelands Caravan Site, Burgess Hill
- Horsgate Caravan Site, Cuckfield
- Walstead Caravan Site, near Lindfield
- Highfields, near Warninglid
- Pitts Head (Woodside Park), near Warninglid
- Marigold Farm Caravan Site, near Ansty

Planning permission will not be granted for an alternative use on a safeguarded site unless an alternative, replacement site has been identified and developed to provide facilities of an equivalent or improved standard (including its location) whilst there remains a need for such sites as evidenced by the Gypsy and Traveller Accommodation Assessment or the best available evidence.

Any new Gypsy and Traveller or Travelling Showpeople sites granted unrestricted, permanent planning permission and implemented shall also be safeguarded for Gypsies, Travellers or Travelling Showpeople<sup>12</sup> use.

**Question 1:** *The above policy proposes to safeguard existing Gypsy and Traveller sites from being developed to alternative uses, whilst there remains a need for such sites, unless a suitable, alternative site has been identified and developed. Do you agree that this is the correct approach to protecting the existing supply of Gypsy and Traveller sites?*

<sup>11</sup> As set out in Paragraph 1 of Annex 1 to the Planning policy for traveller sites (DCLG), or subsequent document. See [www.gov.uk/government/publications/planning-policy-for-traveller-sites](http://www.gov.uk/government/publications/planning-policy-for-traveller-sites)

<sup>12</sup> As set out in Paragraphs 1 and 2 of Annex 1 to the Planning policy for traveller sites (DCLG) , or subsequent document.

## **Draft Policy TSAD 2 - Proposed allocations for Traveller sites**

The second draft policy seeks to allocate sites that are suitable, available and achievable for development as permanent Gypsy and Traveller accommodation, in accordance with national guidance<sup>13</sup>.

For the purposes of public consultation, the policy identifies two locations, consisting of three sites capable of accommodating up to 36 pitches for development. A summary of the methodology employed to identify these sites through the *Mid Sussex Traveller Sites Study* is provided in Appendix B.

All of the proposed sites identified in this document are subject to Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA) and Habitats Regulations Assessment. The relevant documentation for these are published alongside this document for public consultation as set out in the consultation section.

### **Draft Policy TSAD 2 – Traveller Site Allocations**

**To fulfil the identified need for 34 Gypsy and Traveller pitches between now and 2031, as evidenced by the Mid Sussex Gypsy and Traveller Accommodation Assessment (2014 update), the following locations have been identified for potential development for permanent Gypsy and Traveller use<sup>14</sup>, to be solely occupied by Gypsies and Travellers.**

- a) Land to the north and northwest of Burgess Hill (as part of the Northern Arc mixed use strategic allocation) (two sites of 12 pitches)**
- b) Land at Imberhorne Lane Nurseries, Imberhorne Lane, East Grinstead (one site of 12 pitches)**

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<sup>13</sup> See Paragraph 9 – Planning policy for traveller sites (DCLG) - [www.gov.uk/government/publications/planning-policy-for-traveller-sites](http://www.gov.uk/government/publications/planning-policy-for-traveller-sites)

<sup>14</sup> As set out in Paragraph 1 of Annex 1 to the Planning policy for traveller sites (or subsequent document)

## Proposed Sites

A summary of each of the locations proposed as potentially suitable for site allocation is set out in this section. Further details of each site are set out in the *Mid Sussex Gypsy, Traveller and Travelling Showpeople Sites Study*, available to view at [www.midsussex.gov.uk/8686.htm](http://www.midsussex.gov.uk/8686.htm) and at all consultation drop-in points detailed in Appendix A.

**Question 2:** *Do you have any evidence or information about any of the proposed sites which will help Mid Sussex District Council to determine whether they are suitable for permanent Gypsy and Traveller accommodation?*

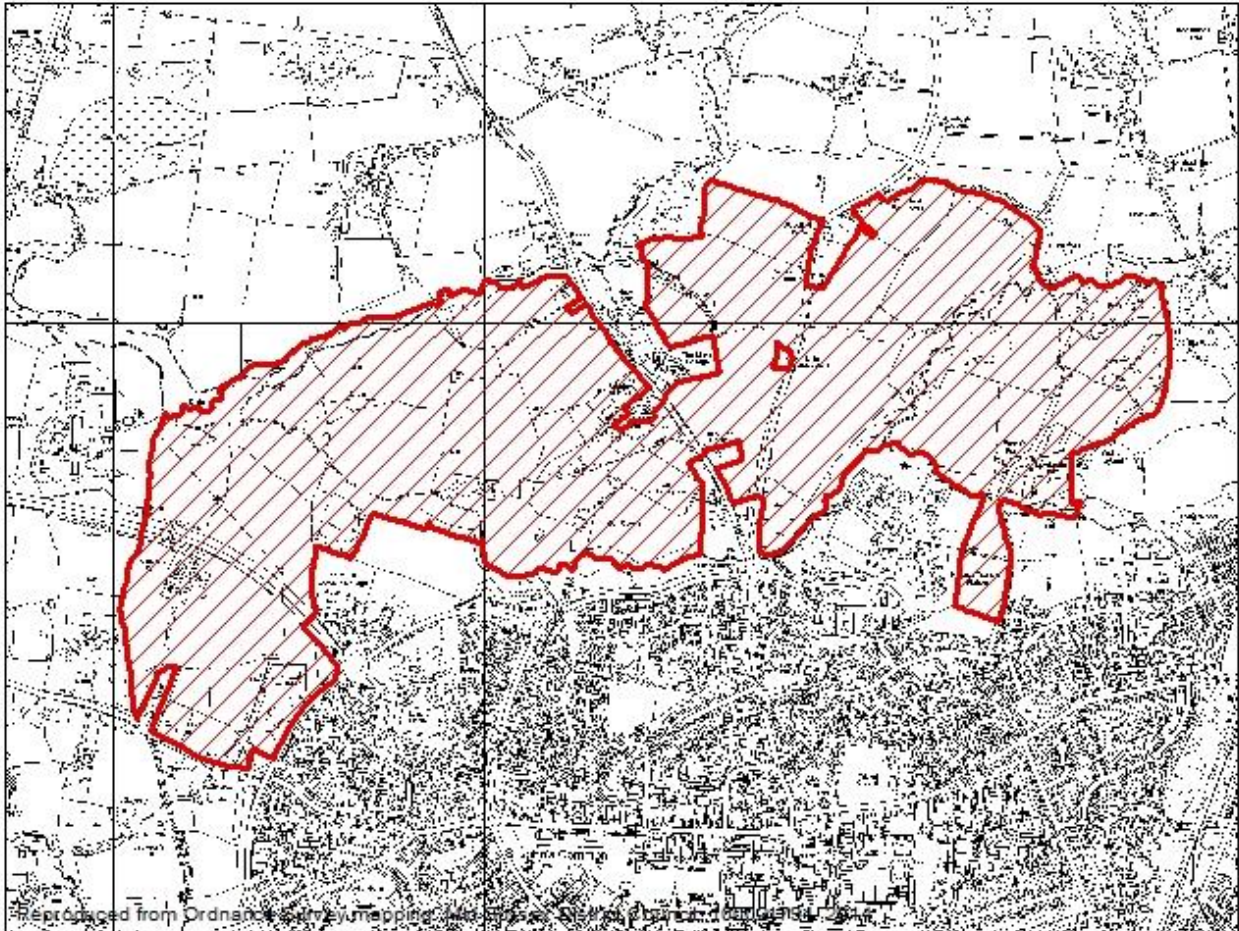
**Question 3:** *Do you have evidence or information about any alternative sites that the Council could consider assessing for permanent Gypsy and Traveller accommodation?*

*Alternative site information can be submitted online at [www.midsussex.gov.uk/8686.htm](http://www.midsussex.gov.uk/8686.htm), or by post or email using the contact details in the Consultation section of this document. Please provide a map clearly showing the boundaries of the site and any available information to demonstrate the suitability of the site.*



## Land to the north and northwest of Burgess Hill (as part of the Northern Arc mixed use strategic allocation)

This location (consisting of two sites – each of 12 pitches), will form part of the mixed-use strategic allocation being sought through the emerging *District Plan*. The actual location of any Gypsy and Traveller allocation is to be determined.



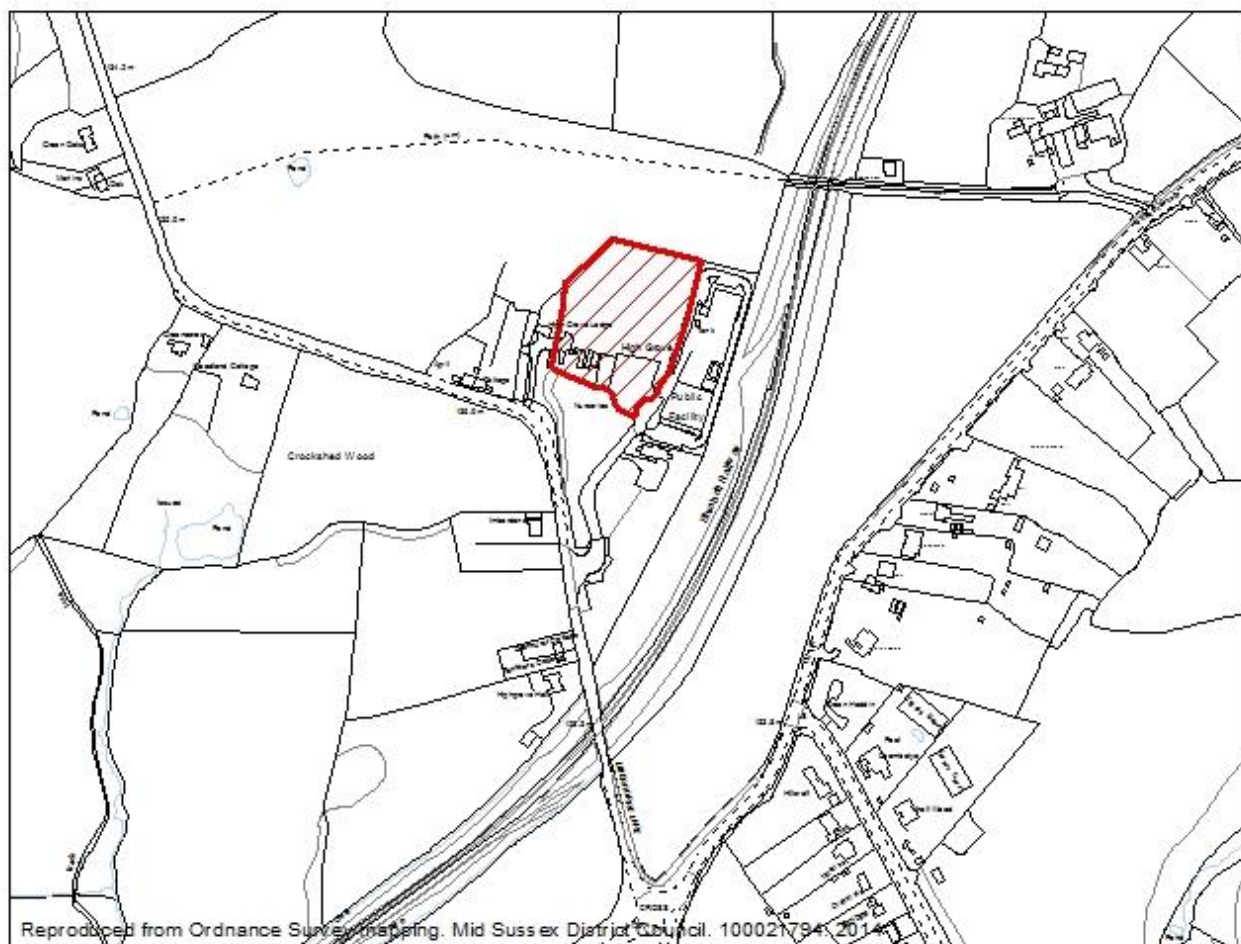
- This location (consisting of two individual sites – each of 12 pitches), will form part of the mixed-use strategic allocation being sought through the emerging District Plan.
- The location of the sites will be determined through the detailed master planning of the site but given the area of the allocation extends to some 220 hectares there is sufficient flexibility to locate the sites in suitable locations in close proximity to existing or planned services, facilities and public transport routes, with provision of good road access and accounting for appropriate ground conditions, neighbouring land uses and the landscape.
- This option performs well in the Sustainability Appraisal.
- It is considered that at least one of the sites can be delivered within five years

**Question 4:** *Do you agree with the Council's above assessment of opportunities and constraints on Land to the north and northwest of Burgess Hill?*

**Question 5:** *Do you agree that part of the strategic development, Land to the north and northwest of Burgess Hill (2 sites of 12 pitches each), should be allocated for permanent Gypsy and Traveller accommodation?*

## Land at Imberhorne Lane Nurseries, Imberhorne Lane, East Grinstead

The site is located to the south west of East Grinstead. The site is in use as a commercial plant nursery and is owned freehold by Mid Sussex District Council and leased to the current occupier. Mid Sussex District Council intends to make the site available for development as permanent Gypsy and Traveller accommodation for development within the next five years.



- If the site is allocated, in order for the site to be made available, the Council will need to serve a notice to quit to the current tenants. The notice can only be served at the time of an approved planning application which is required in order to develop the site, and would need to give a time period of 12 months' notice.
- The site is physically suitable for such use. It is relatively flat, well enclosed from the wider landscape and has good road access.
- The site is of a sufficient size to accommodate up to 12 pitches and facilitate a design that meets current best practice. There is adequate space for a good provision of measures to strengthen the site boundaries; to mitigate against any visual impact on neighbouring

properties and on the landscape; and to visually, acoustically and physically separate the site from the adjacent waste transfer station.

- The site is considered deliverable within five years as it would not require extensive works to develop
- The site is allocated for industrial/ commercial use in the Mid Sussex Local Plan (2004) although this policy is not proposed to be saved upon adoption of the District Plan.
- The site performs reasonably well in the Sustainability Appraisal.
- It is considered that issues of concern to the health and safety, including noise, of future occupiers of the site from the adjacent waste transfer station should not rule it out of consideration at this early stage of the process. This is a modern facility for residents to take their waste and recycling to that also provides a relatively small waste transfer facility that services three refuse vehicles. Waste coming into the site is transferred into articulated lorries and this is taken away to landfill or for further treatment at alternative locations.
- Given the level of testing and the results of monitoring for land contamination that has been undertaken on adjacent land; and that there is no objective evidence available that demonstrates that the potential site is contaminated, it is considered unlikely that there are issues of contamination sufficient enough to warrant ruling the site out of consideration at this early stage in the process. Further work on this issue can be undertaken later in the process
- The site is outside of the ideal distances to local services to be considered fully accessible on foot although public transport is available relatively nearby. The site is also fairly disconnected from the built up area of East Grinstead. Work is underway to explore the facilitation of an extension and upgrade to the existing footpath network that would better connect the site and the surrounding area with the town and significantly reduce the distance to local services and public transport. The proposed route would also negate the need for pedestrian use of the access road by future occupiers of the site
- Given the site's location within the 7km zone of influence around Ashdown Forest, an appropriate assessment under the Habitats Regulations will need to be undertaken and appropriate mitigation provided as required.

**Question 6:** *Do you agree with the Council's above assessment of opportunities and constraints on Land at Imberhorne Lane Nurseries, Imberhorne Lane, East Grinstead?*

**Question 7:** *Do you agree that Land at Imberhorne Lane Nurseries, Imberhorne Lane, East Grinstead (1 site of 12 pitches) should be allocated as a permanent Gypsy and Traveller site?*

## Monitoring and Review

Monitoring is an essential process to ensure the *Traveller Sites Allocations Document* is delivering sufficient sites in a timely manner to meet the identified needs of Gypsies and Travellers.

The monitoring schedule sets out a range of indicators based on those used for the *Traveller Sites Allocations Document Sustainability Appraisal* to maintain close links between the two documents.

The indicators are reported through the Council’s monitoring report. If it appears that policies are not being effective or no longer appropriate in the light of more recent national policies or local circumstances, then action will be taken to review the policy or policies concerned.

**Table 2 – Monitoring Schedule**

<b>Policy</b>	<b>Indicator</b>	<b>Target</b>	<b>Implementation</b>	<b>Source</b>
<b>TSAD1:</b> Safeguarding Existing Authorised Traveller Sites	Net supply of pitches/ plots	In accordance with TSAD 1 (no net loss of pitches/ plots – whilst there remains a need for such sites)	Local Authority	Mid Sussex District Council Monitoring
<b>TSAD 2:</b> Traveller Site Allocations	New additional pitches/ plots delivered	In accordance with TSAD 2 against timescale set out in <i>Table 1 - Total required pitches 2013-2031 - by time period</i>	Local Authority, Developers	Mid Sussex District Council Monitoring



## Appendix A – Places where documents can be inspected

- **All Town and Parish Council offices**
- **Mid Sussex District Council offices**
  - Mid Sussex District Council, Oaklands, Oaklands Road, Haywards Heath, West Sussex, RH16 1SS (01444 477053)
- **All Libraries in Mid Sussex**
  - [Burgess Hill Library](#), The Martlets, Burgess Hill, RH15 9NN (01444 255452)
  - [East Grinstead Library](#), 32-40 West Street, East Grinstead, RH19 4SR (01342 410050)
  - [Hassocks Library](#), Stafford House, Keymer Road, Hassocks, BN6 8QJ (01273 842779)
  - [Haywards Heath Library](#), 34 Boltro Road, Haywards Heath, RH16 1BN (01444 255444)
  - [Hurstpierpoint Library](#), Trinity Road, Hurstpierpoint, Hassocks, BN6 9UY (01273 832609)
  - West Sussex County Council Mobile Library
- **All Help Points in Mid Sussex**
  - Burgess Hill Help Point, Burgess Hill Town Council Offices, 96 Church Walk, Burgess Hill, West Sussex, RH15 9AS (01444 247726)
  - East Grinstead Help Point, Public Library West Street, East Grinstead, West Sussex, RH19 4SR (01342 300780)
  - Haywards Heath Help Point, Oaklands, Oaklands Road, Haywards Heath, West Sussex RH16 1SS (01444 458166)

## Appendix B – Summary of methodology for identifying and assessing potential Gypsy and Traveller Sites

The *Mid Sussex Gypsy, Traveller and Travelling Showpeople Sites Study* is available to view at [www.midsussex.gov.uk/8686.htm](http://www.midsussex.gov.uk/8686.htm) and at all consultation drop-in points detailed in Appendix A.

The Government's *Planning policy for traveller sites* sets out three key criteria for determining appropriate *deliverable* sites through the planning system.

To be considered **deliverable** (capable of delivery within five years), sites should:

- Be **available** now or there should be a reasonable prospect that the site is available at the point envisaged;
- Offer a **suitable** location for development; and
- Be **achievable** within five years including being viable.

To be considered **developable**, sites should be in a suitable location and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.

The assessment criteria should therefore draw out whether a site is available, suitable and achievable for permanent Gypsy and Traveller accommodation, within a specific time period. Criteria should also be fair and facilitate the traditional and nomadic life of Gypsies and Travellers while respecting the interests of the settled community and not be unduly restrictive.

### Identifying sites

Potential sites were established from a review of:

- Existing sites including unauthorised sites and those subject to temporary permission;
- Potential for expansion of existing authorised sites;
- Land within public ownership including Mid Sussex District Council owned land;
- Land identified in the Housing Land Supply document as having potential for development including contacting known landowners; and
- Land identified through a public 'call for sites'.

### Site assessment

For the purposes of site assessment, broad site assessment criteria (see Table A) were applied at two stages.

**Table A - Broad site assessment criteria**

<b>Availability</b>	<ul style="list-style-type: none"><li>• Landowner willing to allow land to be used for Traveller accommodation</li><li>• No overriding issues such as multiple ownership or legal constraints</li></ul>
<b>Suitability</b>	
Policy constraints	<ul style="list-style-type: none"><li>• Site is not within and/ or compromises the objectives of an international, national or local environmental designation.</li><li>• Site is not within alternative development plan designations</li><li>• Site is not an open space identified as having 'high value' in the MSDC <i>PPG17 Open Space Assessment</i></li></ul>
Physical problems or limitations	<ul style="list-style-type: none"><li>• Site is not at high risk of flooding that cannot be mitigated</li><li>• Site is not on unstable, contaminated or steep land</li><li>• Site has safe road access</li><li>• Site is reasonably located to local services and facilities</li></ul>
Potential impacts	<ul style="list-style-type: none"><li>• Site would not have adverse impact on character of landscape or built environment including archaeological remains</li><li>• Site is not subject to unacceptable noise levels or would subject neighbouring land uses to unacceptable noise levels</li><li>• Site would not dominate the nearest settled community</li></ul>
<b>Achievability</b>	<ul style="list-style-type: none"><li>• The cost of the site coming forward is not set to an unacceptable level by any constraints or impacts identified</li></ul>

### **Stage 1 assessment**

Stage 1 assessment was based on the broad assessment criteria set out in Table A and utilised a 'traffic light' indicator system. Sites that are unavailable or subject to absolute policy or physical constraint are flagged as 'red' and eliminated from further assessment. Where criteria have the potential to be satisfied, this is shown as 'yellow' and where criteria is satisfied, this is shown as 'green'.

Availability is a key consideration to demonstrate site deliverability. To establish this on potentially suitable sites, contact was made with landowners and land agents. Sites rejected on availability grounds will be reassessed in the future should their status change.

Sites suitable for further consideration are subject to a more detailed Stage 2 assessment including a further assessment of suitability, an estimate of potential capacity and potential mode of delivery.

**Table 2 - Stage 1 assessment criteria**

Criteria	Red	Yellow	Green
<b>Availability</b>			
Position of landowner/s	Site not available now or in future for Traveller accommodation	Unknown availability warranting further investigation	Site being actively promoted for Traveller accommodation
<b>Suitability</b>			
Environmental designations	Site is within Site of Special Scientific Interest (SSSI), Site of Nature Conservation Importance (SNCI), Local Nature Reserve (LNR), Ancient Woodland (or significant proportion of site within 15 metre buffer zone) or within 400m buffer of a Special Area of Conservation/ Special Protection Area.	Site is in close proximity to a SSSI, SNCI or a LNR, Ancient Woodland or within 7km buffer of a Special Area of Conservation/ Special Protection Area.	Site is not within or in close proximity to any international, national or local designations or within any identified buffers.
Alternative designation	Site is identified for an alternative use in development plan. Site identified as having 'high value' in the MSDC <i>PPG17 Open Space Assessment</i> .	Site is identified for alternative use in development plan but potential justification for alternative use.	Site is not identified for alternative uses.
Flood zone	Significant area of site within Strategic Flood Risk Assessment (SFRA) Zone 3.	Significant area of site within SFRA Zone 2.	Site is not affected by identified areas of flooding or is in SFRA Zone 1
Road access	Road access clearly unavailable or affected by severe limitations.	Potential exists to gain safe road access.	Safe road access already exists.
Archaeology and the built environment	The site is covered by or adjacent to a Scheduled Monument. Clear unacceptable impact on listed building or conservation area with little prospect of mitigation.	Site could have potential impact on Scheduled Monument, listed building or Conservation Area.	Site is not within or close to any known Scheduled Monument or built environment designations.
<b>Achievability</b>			
Site viable to develop	Cost of site coming forward would clearly make site unviable.	Cost of site potentially unviable – warrants further investigation.	Site considered viable.

**Stage 2 assessment**

Shortlisted sites suitable for further consideration were then subject to more detailed assessment based on the broad site assessment criteria that included:

- Physical constraints including site topography and site conditions, access to the site and accessibility to existing services and facilities and neighbouring land uses;
- Potential impacts including landscape impact and built development; and
- Review of any achievability issues; and
- Assessment of potential capacity