

Partial Review of the South East Plan – Provision for Gypsies and Travellers

Meeting	Members Steering Group
Date	11 September 2007
Report title	Consultation response
Report by	Officers Advisory Group
Purpose	Following the recent consultations, to seek Members' agreement on the final advice that should be submitted to SEERA on the overall need for, and distribution of, permanent pitches

1. The Members Steering Group is recommended to:

- i. note the feedback received on the joint authorities' draft proposals for permanent pitch provision, 2006-2016;
- ii. agree, having taken account of all the comments received, that no changes should be made to the joint authorities' original proposals for additional permanent pitches; and
- iii. send this report to SEERA to ensure the Assembly is aware of the serious concerns expressed by local Gypsies and Travellers and their representatives and some of the underlying reasons for this.

1 Supporting information

- 1.1 At its last meeting on 5 July 2007 members agreed proposals for consulting on the joint authorities' draft proposals for the future provision of additional permanent residential pitches. It was also agreed that the County Council co-ordinate consultations in East Sussex, with the City Council playing the same role in Brighton & Hove.
- 1.2 Members supported officers' recommendations that an overall total of 47 permanent pitches should be provided across the whole area between 2006 and 2011, and that no further provision is likely to be required in the following five years to 2016. Members also agreed a needs-based option and a more sustainable alternative for distributing the overall requirement to 2011 as detailed below.

Consultation proposals for permanent pitch provision, 2006-2011

	Number of permanent pitches required, 2006-11	
	Option A The needs-based distribution	Option B A more sustainable distribution
Eastbourne	1	1
Hastings	3	1
Lewes	10	9
Rother	3	7
Wealden	16	18
Brighton & Hove	14	11
East Sussex	33	36
Total requirement	47	47

2 Consultation programme and response

- 2.1 Our consultations were held over a six-week period from 16 July to 26 August 2007. Details of the consultation proposals were either posted or e-mailed to around 60 local stakeholders (listed in Appendix A). Comprehensive information was also published on the County and City Councils' websites, and stakeholders were able to submit their comments electronically.
- 2.2 To facilitate more direct feedback from key stakeholders, consultation meetings were arranged in East Sussex with representatives of the Showmen's Guild and the county/district associations of local councils. A further pre-meeting was held with local Gypsies and Travellers and their representatives to discuss the joint authorities draft proposals more informally before the special East Sussex Traveller Forum on 9 August that was arranged specifically for this consultation process. In Brighton & Hove, informal interviews/discussions were also carried out with individual Gypsy and Traveller families based, or stopping, in and around the city.
- 3.3 To ensure members are fully aware of the views expressed, a summary of all the responses received are given in Appendix B, together with the local authorities' proposed response. This includes key points raised at the meetings with key stakeholders referred to above. Following the discussions and decisions taken at this meeting, replies will also be sent to stakeholders that have submitted written comments.

3 Key issues raised by the consultations

- 3.1 It is clear that some sections of the travelling community are very unhappy with the authorities' joint proposals, with local Gypsies and Travellers and their representatives expressing strong criticisms. In particular, the extent of need for future permanent pitch provision is believed to have been seriously under-estimated because the underlying Gypsy and Traveller Accommodation Assessment (GTAA) is regarded as being fundamentally flawed. The suggested shortcomings of the GTAA are considered to be related to insufficient engagement of Travellers in the process.
- 3.2 More detailed issues relating to specific elements of the needs model have also been raised – for example, in relation to traveller households in bricks and mortar housing, vacancy rates, concealed households and future household formation. Draft responses to all of the detailed points raised in the consultations are set out in Appendix B.
- 3.3 More generally, it is not claimed in responding to such criticism, that the GTAA for this area (or any other area) is flawless. Indeed, the survey was one of the first to be conducted and pre-dated the publication of official guidance. However, it is also clear from the independent audit being carried out by Pat Niner for SEERA that each GTAA has its own particular strengths and weaknesses, and that we do now have for the first time much more objective and consistent assessments of the need for additional pitch provision across the whole region.
- 3.4 Contrary to some claims, Travellers were directly involved in the assessment process, both as members of the steering group for the GTAA and through regular updates at the Traveller Forum. Some local travellers also assisted in introducing interviewers to Gypsy and Traveller households that were being asked to participate in the representative sample survey.
- 3.5 We have also reviewed and refined the findings of our GTAA in accordance with the requirements of SEERA's brief and the detailed advice set out in the DCLG's guidance (that was drafted by Pat Niner and her team). In carrying out this detailed benchmarking exercise, we have drawn on the survey results, the twice-yearly official Caravan Counts,

site waiting lists, local monitoring records and Government advice to improve and refine the GTAA's original needs assessment.

- 3.6 The GTAA could and will no doubt be improved upon when it is carried out again. As well as benefiting from our recent experience, this future review will be able to assess the impact of additional pitch provision to 2011 and also identify any newly-arising needs.
- 3.7 Although some rather anecdotal information has been submitted by Travellers and their representatives in support of their concerns, no hard evidence has been presented that would suggest any changes should be made at this stage to the authorities' consultation proposals for additional permanent pitches. However, we believe that much of the anger evident in many Travellers' views is less to do with the levels of provision the joint authorities are advocating and much more to do with the serious frustration that the travelling community feels about the lack of progress local planning authorities appear to be making in bringing forward new caravan sites.
- 3.8 Government policy clearly encourages authorities to bring forward sites in advance of the statutory development plan process where a clear need exists. The East Sussex and Brighton & Hove authorities have identified a need to provide an additional 47 pitches by 2011, much of which relates to a pressing backlog of existing, unmet need. Final targets for provision are unlikely to get established in the revised South East Plan before 2010 and, as another report to this meeting on implementation and delivery issues makes clear, the Core Strategies (let alone Site Allocation DPDs) of Local Development Frameworks across our area are very unlikely to be adopted much before that. Clearly, if the need for permanent pitches that we have identified as being required between 2006 and 2011 are actually going to become available within this period then work to identify suitable sites should now proceed with a sense of urgency.

4 Rounding the provision figures

- 4.1 It is suggested in Government guidance that it might be best to round proposed provision figures to the nearest 5 pitches. However, while this may be sensible in areas with relatively high needs, we do not believe it would be appropriate for our area as this would result in quite large adjustments to our need estimates for some districts. It would also lead to different totals for Option A (which would get rounded up to 50 pitches) and Option B (which would get rounded down to 45 pitches).

5 Conclusions

- 5.1 The consultation process generated a limited but informative response and appears to have been successful in engaging the Gypsy and Traveller community in East Sussex and Brighton & Hove. Although some Travellers and their representatives have expressed quite strong opposition to our draft figures for permanent pitch provision, no evidence has been received that should prompt any revision to the authorities' consultation proposals. However, there is an increasingly urgent requirement for local planning authorities to bring forward appropriate sites as soon as possible to address the clear needs that have been identified.
- 5.2 Members are therefore advised to confirm that no change should be made to our joint consultation proposals and to commend these figures to their own authority for formal endorsement. It is also recommended that, in supplying these figures to SEERA, they should not be rounded.

Appendix A – Local stakeholders consulted on the local authorities’ draft proposals for permanent pitches

1066 Housing Association	Shelter Housing Advice Centre
Action in Rural Sussex	Showmen’s Guild of Great Britain
Age Concern	Sompriti
Brighton & Hove Primary Care Trust	South Downs Housing Association
Campaign to Protect Rural England	SEEDA
Care for the Carers	Southern Housing Group
Commission for Racial Equality	Strategic Health Authority
Country Land and Business Association	Surrey County Council
Downland Affinity HG	Sussex Association of Local Councils
East Sussex Disability Association	Sussex Enterprise
East Sussex Downs & Weald PCT	Sussex Learning & Skills Council
East Sussex Economic Partnership	Sussex Police
East Sussex Economic Partnership	Sussex Traveller Action Group
East Sussex Fire and Rescue Service	Sussex Wildlife Trust
East Sussex Learning Partnership	Town & Country Housing Group
East Sussex MPs	Traveller representatives
East Sussex Traveller Forum	Warden Housing Association
English Heritage	Wealden Association of Local Councils
English Partnerships	West Sussex County Council
Environment Agency	
Federation of Small Businesses	
Federation of Sussex Amenity Societies	
Friends, Families and Travellers	
Government Office for the South East	
Hastings and Rother PCT	
Housing Corporation	
Kent County Council	
Lewes Association of Local Councils	
Moat Housing	
National Farmers’ Union – East Sussex	
National Trust – Southern Region	
Natural England	
Orbit Housing Association	
Raglan Housing Association	
Rother Association of Local Councils	
Rother Homes	

Appendix B – Summary of Responses to East Sussex and Brighton & Hove Consultations on Meeting the Accommodation Needs of Gypsies and Travellers (Partial Review of South East Plan).

Respondent	Issue	Summary of content	Councils' response
Brighton & Hove PCT	General	Welcome the scoping of accommodation needs and options for future allocation of appropriate sites.	Support noted.
	Distribution	Option B has greatest potential to address specific health needs and enable services to engage with Gypsies and Travellers. GTAA report does not distinguish between the health needs of people living in permanent and transit sites making it difficult to comment on options A and B from a public health perspective.	Comments noted.
	Health Impact Assessment	Would advise a Health Impact Assessment of the Options Statement at GTAA area or South East level.	Will query whether this is to be undertaken by SEERA at the Preferred Options stage (May – August 2008).
	Site location	Location of permanent and transit sites should be informed by access to facilities (education, health, work and other community facilities) particularly a General Practice, midwifery, health adviser and dentistry services. Additional issues such as health impact of the physical location of sites should also be addressed in the context of the LDF core strategy.	These factors will be fully taken into account when site identification is carried out in each area as part of the LDF process. Detailed criteria for assessing the suitability of sites for Gypsies and Travellers will be included in each Core Strategy.
Sussex Traveller Action Group (STAG)	Number of pitches	Overall number of pitches required is too low. Is the level of need related to waiting lists for existing pitches?	Level of need is based on the findings from our the Gypsy and Traveller Accommodation Assessment (GTAA). This includes survey responses from Gypsies & Travellers and data from twice-yearly caravan counts reported to DCLG. An allowance is also made for households on site waiting lists. All local authorities' GTAA results have been independently benchmarked by consultants appointed by SEERA. The results have been adjusted in accordance with this to produce our overall permanent pitch requirement. Full details of this process can be found in the consultation document and supporting technical papers.

	Distribution	Figure of 14 pitches (option A) for Brighton & Hove seems high compared to other areas Does Lewes have sufficient pitches for expansion of families?	The pitch allocations under Option A are directly derived from evidence of local needs. Household formation (at an assumed rate of 3% per year) has been factored into the assessment for all districts.
	Methodology	Expected vacancy rate seems too high. Number of concealed households probably too low. Have New Travellers been adequately involved in the research?	Vacancy rates reflect actual experience within the study area. An allowance for the needs of concealed households is also included, based on the findings of our GTAA research outlined above. However, all aspects of the needs assessment will be subject to ongoing monitoring and review once new provision has been established. New Travellers were included in the representative GTAA survey sample.
	Site location	How will sites be identified? Will Green Belt land be considered for small sites?	Site will be identified through the local authorities' LDF process in accordance with the strategic criteria set out in the revised South East Plan. Site identification may, and should, proceed before the formal adoption of development plan documents where the need is urgent, as endorsed in CLG Circular 1/2006. The need to safeguard nationally designated areas such as AONBs and National Parks, land will be taken into consideration when identifying sites, in the same way as it is for the settled community. There is no Green Belt within the East Sussex and Brighton & Hove Study Area.
	Groups of Travellers	Will Brighton & Hove pitches be for New Travellers or Traditional Travellers?	No decision has yet been made on who will be allocated pitches on new sites. All Gypsies and Travellers will be treated equally in terms of meeting site allocation criteria.
	Implementation and timescales	What provision for Gypsy & Traveller accommodation needs will be made before new pitches are available? Will pitch provision be brought forward in advance of the planned timetable?	Until additional pitches are available, unauthorised encampments will be dealt with in accordance with local authorities' Traveller Strategies and agreed protocols and procedures. Where needs are urgent, the local authorities should bring forward proposals for appropriate provision ahead of LDF timetable.

<p>Friends, Families and Travellers</p>	<p>Methodology</p>	<p>Strongly object to draft proposals as basic data used for analysis of need is flawed. Not confident in robustness of original GTAA.</p> <p>SEERA should test the robustness of GTAA's by commissioning an independent examination of the data using the local knowledge of Gypsy & Traveller groups/ individuals (who do not consider that the process has been participative).</p> <p>Variations between targets agreed for different areas are too big to be accounted for through differing situations.</p>	<p>The GTAA is statistically robust at sub-regional level (i.e. for the Study area).</p> <p>Local Gypsies and Travellers were closely involved in the development of the survey from its outset and also by virtue of their responses to the survey questionnaire itself. Traveller representatives participated in the Steering Group for the GTAA and there were regular discussions about its progress at the East Sussex Traveller Forum.</p> <p>SEERA have undertaken an independent benchmarking exercise, using DCLG's consultant, Pat Niner (From the Centre for Urban and Regional Studies at the University of Birmingham). This has been undertaken to ensure a consistency of approach across the region and clearly supports the conclusions we reached in our own earlier benchmarking exercise.</p> <p>There is very wide variation in levels of need and demand for sites across the region (and beyond) and this will be reflected in the respective needs assessments for different areas.</p>
	<p>Gypsies and Travellers in housing</p>	<p>Report does not sufficiently reflect the number of Gypsies and Travellers who are unhappy living in housing and would like to live on sites. The level of need for this group has been underestimated in East Sussex.</p> <p>The GTAA needs assessment accounts for households moving from sites into housing but not vice versa.</p>	<p>Around half of the survey sample was made up of respondents in bricks and mortar housing, and an allowance has been made in our needs assessment for housed Gypsies and Travellers wishing to move to permanent sites. This reflects our survey finding regarding the number of such households who have registered their need on a site waiting list.</p> <p>If any further evidence is available regarding the needs of particular families in housing who need permanent site accommodation, then it would be helpful if this could be provided and the households concerned be encouraged to make their needs known to the local authorities.</p>

	Site management records	DCLG guidance states that site management records should be taken into account to assess need. Don't understand why numbers on East Sussex site waiting lists are confidential. Pitch turnover rates on permanent sites should also be examined.	Pitch turnover on permanent sites has been taken account of in the assessment of likely vacancies arising from existing sites. Confidential (personal) data from site waiting lists has also been used to estimate the needs of housed Gypsy and Traveller households that may need permanent pitch provision.
	Private Gypsy and Traveller sites	Many private sites in East Sussex only have temporary planning permission. They should be excluded from the calculations or granted permanent planning permission. Consultation document is unclear whether or not the private sites mentioned in Wealden have permanent planning permission.	Our assessment has included an allowance for the needs of households living on unauthorised (private) developments – i.e. those without planning permission. Applications for planning permission must be considered on a case-by-case basis in accordance with the development plan. The South East Plan will establish minimum requirements for future provision. Local planning authorities could make additional provision to meet modest needs that might possibly arise should any temporary permissions not be renewed or granted full permission.
	Pitch numbers	Proposed figure of 80 pitches in GTAA underestimates actual need. Pitches required for unauthorised campers severely underestimated.	The benchmarking exercises (undertaken by the local authorities and independently by SEERA) indicate that the overall level of need identified through the GTAA was robust. However, the total requirement for 80 pitches needs discounting to only include needs for permanent residential pitches (please refer to the consultation document and background technical papers for more detailed information). Caravan Count data for July 2005 and local monitoring records have been used to assess the need for permanent pitches arising from unauthorised encampments. The local authorities are confident in the accuracy of this information.

	Emergency stopping places and transit sites	<p>Short term/emergency stopping places should not be overlooked and are an important part of any strategy to address need. Current travelling patterns are heavily influenced by lack of sites and stopping places and the impact of permanent or transit provision is unpredictable. Flexible plans that can adapt to changing circumstances are needed.</p> <p>A variety of provision is required to meet need including permanent, transit and informal network of stopping places.</p>	<p>In Brighton & Hove, the City Council does facilitate the use of emergency stopping places (on 'tolerated' sites), particularly in response to health/welfare assessments where these indicate a need for temporary accommodation that could not otherwise be met.</p> <p>It is agreed that a variety of provision is required to meet the accommodation needs of Gypsies and Travellers. Ongoing monitoring will be required to assess the impacts of new provision and identify and potential newly-arising needs.</p>
	Implementation and timescales	<p>There is no evidence that steps are being taken to bring forward sites in advance of this timetable as outlined in circular 1/2006.</p> <p>Concerned about lack of political leadership shown by local authorities and good intentions not being backed up by action.</p> <p>Would like penalties to make sure local authorities fulfil their requirements to provide sites and incentives to bring these forward sooner.</p>	<p>The need and scope for bringing forward proposals for appropriate site provision ahead of SEERA and LDF timetables to meet urgent requirements will be considered by the local authorities.</p>
	Distribution	<p>Option A – influenced by current distribution rather than where Gypsies and Travellers choose to live (even expressed preferences will be influenced by previous experience of evictions/toleration).</p> <p>Option B – unconvinced that factors included in this distribution can be balanced in any meaningful way.</p>	<p>SEERA acknowledge that the methodology advised for assessing Option A is likely to reflect the current distributions of provision.</p> <p>Option B offers the opportunity to consider an alternative distribution which reflects both expressed choices/preferences and a wider range of considerations (such as accessibility to services and environmental constraints etc).</p> <p>No alternative proposals for distributing requirements have been received.</p>
	Right to a nomadic lifestyle	<p>Discourse is centred around provision as a means of greater enforcement against unauthorised encampments rather than meeting Gypsy and Traveller needs.</p> <p>Concerned that the concept of nomadism is not just afforded 'lip service' but enabled to coexist within society.</p>	<p>The local authorities' aims are to assess and to plan to meet the needs of Gypsies and Travellers for site accommodation in our area. Providing a variety of pitch provision across our area in accordance with these assessments should meet the needs of Gypsies and Travellers and also reduce the incidence of unauthorised encampments.</p>

Gypsies and Travellers in East Sussex – views expressed at a special consultation meeting with representatives before the East Sussex Traveller Forum on 9 August	Pitch numbers	The group has no confidence in the figures produced. The final and overall requirement of 47 extra pitches 2006-11 is not sufficient for the local requirement. This was unanimously agreed.	The requirement for permanent pitches is derived from the GTAA findings. The benchmarking exercises subsequently undertaken by the local authorities and independently by SEERA indicate that the overall level of need identified through the GTAA was robust. However, the total requirement for 80 pitches had to be adjusted to only include the need for permanent residential pitches.
	GTAA	The group has no confidence in the Accommodation Needs Assessment carried out by David Couttie Associates. There is no confidence in the methodology, largely because there was not enough involvement from the Traveller community.	The benchmarking exercises carried out by the local authorities and independently by SEERA indicate that the overall level of need identified through the GTAA was robust. The Traveller community has been involved in the whole process through participation in the steering group for the GTAA, as respondents to the survey and through regular updates and discussion at the Traveller Forum (and associated pre-meetings).
	Future needs	Not enough consideration has been given to the younger generation and their future accommodation needs – especially since Gypsies tend to have larger than average families.	The needs assessment includes a specific allowance for the current unmet needs of concealed households (mainly younger adults who are currently frustrated in their desire to establish their own separate household). It has been assumed in line with official guidance that the number of Traveller households in this area will grow at a rate of 3% per year.
	Further research	A further assessment from the travelling community is required. It is believed that only Travellers are in a position to track down, interview, and communicate with other Travellers. This piece of research would require funding.	This is not believed to be necessary. However, the continuing input and involvement of Travellers through the Traveller Forum will be very valuable in learning lessons from the current process and improving the GTAA when it is reviewed and updated.
	Needs of Travellers in housing	One local family has around 50 grandchildren, most of whom are unhappily housed because there is not sufficient local site accommodation. Members of this family might choose to go back onto a site if this option were open to them. Travellers' health care needs suffer in conventional housing, especially with regards to their mental health.	Our assessment does include a modest allowance for households to move back onto permanent sites from housing. However, the site waiting list and feedback from the district councils do not indicate a more significant problem. However, the Traveller Officer Group will continue to monitor the situation and respond to any issues or needs that do become apparent.

	Planning permissions	Questions were asked about why the planning process is so long and hard, and why it is that only temporary permission is invariably granted. This places families in limbo because they cannot access local services until full planning permission is granted.	It is difficult to generalise because temporary planning permissions may be granted for different reasons for different sites/situations. Generally, full planning permission will only be granted if the proposal conforms with relevant local planning policies. These policies should be much clearer and be expressed more positively in future as a result of this current exercise.
	Unauthorised developments	Urgent consideration should be given to existing unauthorised developments on traveller-owned land. Planning permission should be granted on these sites as soon as possible, thereby reducing the level of need for extra public provision.	Applications for planning permission must be assessed against the relevant policies in the development plan and site ownership is not a relevant consideration. However, it is accepted that local planning authorities should now act with a sense of urgency in identifying and bringing forward suitable sites for extra permanent pitches.
Showmen's Guild of Great Britain	Travelling showpeople	<p>There are currently four family groups of Travelling Showpeople in East Sussex – at Eastbourne, Lower Dicker, Hailsham and Bexhill. These groups have adequate housing and storage accommodation at present and are not seeking any more space.</p> <p>There is, therefore, no demand for additional yards in this area. However, LDFs should include appropriate criteria for judging such applications.</p>	Comments noted and supported.
Rother Association of Local Councils	General	The subject has been thoroughly examined and anyone who can take the time to read the evidence will be convinced of the conclusions. However, the problem will ultimately be in convincing the general public of the need to provide new sites particularly when they have either no, or a bad, experience of existing sites.	Comments noted.
	Need for accurate information	There may be reluctance in rural areas of Rother for further sites particularly as the needs based distribution has been rounded up for the sustainable option. It will therefore be important for straight facts to be widely published in order to prevent misinformation and scare stories to blight the process.	Comments noted.

	Future consultations	I understand that consultation will be brought to a local level and Rother Association of Local Councils will be committed to enabling a smooth process as far as it is able during the consultation period in May - July 2008 and other more local consultations.	Support appreciated.
Commission for Racial Equality	Monitoring	Monitoring arrangement need to be in place to determine whether the assumption about longer-term needs (after 2011) will remain valid in future years and to consider how they would meet any additional need identified.	Agreed. It is expected that the GTAA will be reviewed in the next few years and that this will provide a clear opportunity to reassess any local needs for further provision, including in the period 2011-2016.
	Pitch numbers	Concerned that the baseline data for this assessment are flawed and severely underestimate the number of sites needed to provide adequate and fair accommodation for Gypsies and Travellers.	The requirement for permanent pitches is derived from the GTAA findings. The benchmarking exercises subsequently undertaken by the local authorities and independently by SEERA indicate that the overall level of need identified through the GTAA was robust. However, the total requirement for 80 pitches had to be adjusted to only include the need for permanent residential pitches.
	Urgent need	Circular 1/2006 states that local authorities should bring forward sites provision in advance of the strategic planning process where there is an unmet need. We believe that there is such a need in this area and would like to know why the local authorities have decided not to act on this part of the Circular.	Agreed. There are clearly unmet needs for permanent pitches in this area. Having identified these requirements, the local planning authorities do accept that they need to act with a sense of urgency in bringing forward suitable sites.
	Updating the assessment	Some years have passed since the GTAA was done. What consideration has been given to the growth need that may or may not have arisen since 2005?	The GTAA assessed the overall extent of need for the whole five-year period from 2006-2011. In our subsequent work, we also considered whether any additional permanent pitches might also be required over the following five years from 2011.
	Influence on need	Furthermore, has the Local Authority taken into account that their calculation of the need for both permanent and transit sites is hugely influenced by the lack of sites available rather than the wishes of Gypsies and Travellers to stop where they wish.	We understand the point. However, the GTAA did seek to find out about Gypsies' and Travellers' own wishes for where they would most like to stay. Option B – the more sustainable distribution – does take explicit account of these preferences and desires.

	Engagement with Gypsies and Travellers	We again would encourage the local authority to review its engagement strategy. This may include providing a detailed description of how this assessment was carried out and allowing this methodology to be scrutinised by local stakeholders.	Gypsies and Travellers have been engaged in the whole process through participation in the Steering Group for the GTAA, discussions at the Traveller Forum (and associated pre-meetings) and as respondents to the survey. Detailed information about the assessment has been published (on the County Council's website) and will be sent to anyone on request.
	Distinguishing permanent and transit needs	We are concerned that, having failed to make the distinction between the need for permanent and transit sites in the initial research, subsequent assessments of the split may not be accurate. Estimating the split wrongly in either direction will clearly have negative consequences and we believe it is critical that the method used to distinguish between permanent and transit sites is made public, to allow stakeholders to analyse the method for its accuracy.	As our consultation document makes clear, this issue arises in relation to unauthorised encampments. The County and City Councils used their ongoing, detailed monitoring records on unauthorised camping to estimate the number of Gypsy and Traveller families/households involved that would appear to have a need for a permanent residential pitch in this area.
	Promoting good race relations	Local authorities should be careful and vigilant about placing too much emphasis on the need for sites, as a way to use their enforcement powers against unauthorised encampments. This might have implications for their Race Equality Duty to promote good race relations between people of different ethnic groups.	Comments noted.
Sussex Association of Local Councils, and the Lewes and Wealden Associations of Local Councils	Pitch numbers	Concern was expressed that the Lewes figures may be excessive. There was also a feeling that the document was not really clear enough up about the pitch numbers being additional provision that is required over and above that already available.	Comments noted. A full account of how the proposals have been derived is set out in the consultation document and the two supporting technical papers.
		There is some concern that needs might have been underestimated because there are thought to be unauthorised developments in Wealden that did not feature in the earlier information on existing sites provided to SEERA.	Needs relating to unauthorised developments have been taken into account in the needs model.

		<p>This exercise is long overdue and there is concern that the district councils have not yet begun to make additional provision, particularly in the light of losing planning appeals on unauthorised developments due the current lack of adequate permanent provision. Suitable sites should be identified now.</p>	<p>Agreed. Having clearly identified the requirement for extra permanent pitches, the local planning authorities do acknowledge the need to act with a sense of urgency in bringing suitable sites forward for development.</p>
		<p>The difficulties of making necessary provision and of overcoming local concerns and prejudice are understood. However, members have been elected to make tough decisions and that existing problems and conflicts will never be solved whilst there is inadequate provision.</p>	<p>Comments noted.</p>
<p>East Sussex Fire and Rescue Service</p>	<p>General</p>	<p>Historically, the number of fires involving gypsy and traveller (mobile) homes has not been identified as a regularly recurring problem, nor are the frequencies of such fires high (in the order of one per year over the last ten years). As a result, ESFRS is not able to determine a preference of Options based on risk. The Fire Service is considering new work to engage with Gypsies and Traveller communities in respect of wider fire prevention issues and welcome any contact with those communities that this work on accommodation needs may result in.</p>	<p>Comments noted.</p>
<p>Brighton and Hove Environmental Action Group (BHEAG)</p>	<p>Site provision</p>	<p>Understand and support the need for transit sites and would therefore support 11 (or 14) additional transit pitches.</p> <p>Do not understand or support the need for permanent sites. Ask for rationale to be provided for this.</p>	<p>The pitch requirement figures of 14 and 11 (for Brighton & Hove) relate to the need for permanent provision not transit provision.</p> <p>Whilst Gypsies & Travellers have an historic and ethnic history of travelling there is a clear need expressed by travelling communities for permanent provision where they can spend a large part of the year, enabling them to better access services such as education and health. Government now require all local authorities to address this need.</p>

	Methodology	<p>Would like confirmation that the GTAA consultants used July 2005 caravan counts. If this is the case the figures are much inflated by higher number of unauthorised encampments in 2005.</p> <p>Dramatic increase in unauthorised encampments in Brighton & Hove from November 2004, mainly from Irish Travellers. Believe this was an 'orchestrated campaign' to inflate numbers prior to SEERA consultation.</p>	<p>The GTAA assessment is largely based on a representative sample survey of local Gypsies & Travellers. Caravan Count data for July 2005 was used initially to estimate overall needs on unauthorised encampments. However, local monitoring records have been used to translate that initial estimate into an allowance for related permanent (rather than transit) provision.</p> <p>All local authorities' GTAA results have been benchmarked to ensure robustness and consistency across areas, and the results have been adjusted in accordance with this to produce the overall pitch requirement. More details on this process can be found in the consultation document and background papers.</p>
	Consultation	There has been no resident consultation or updates on progress until now.	This is the very first stage of the process to establish pitch requirements for individual local authorities. There will be a full public consultation exercise on SEERA's preferred options regarding pitch requirements (which will be developed using our advice) in May – August 2008.
	Consultation document	<p>Not balanced in terms of insufficient recognition of the rights of the settled community and the unacceptability of unauthorised encampments.</p> <p>Use of term 'unauthorised encampment' downgrades the 'offence'. Inflammatory language?</p>	<p>It is recognised that some unauthorised encampments can impede local people's access to facilities and may sometimes be associated with antisocial behaviour. The local authorities seek to take swift action in accordance with established protocols where this is the case. We also recognise the rights of the settled community as well as Gypsies & Travellers and the need for sensitivity in balancing these rights and needs, especially where tensions occur. Making proper pitch provision on authorised sites across East Sussex and Brighton & Hove should, however, substantially reduce the source for such tensions.</p> <p>'Unauthorised encampment' is a recognised term used by central government and local authorities.</p>

Brighton and Hove Environmental Action Group (BHEAG)	Further response following clarification and additional information from BHCC	<p>Do not believe that sufficient evidence or data is available to make the case for a need for additional permanent sites.</p> <p>Permanent site provision in the UK should not be addressed until after data is available from the 2011 Census.</p> <p>Support the transit site at Horsdean and two further emergency stopping places for health and welfare needs.</p>	<p>Although many Gypsies and Travellers do live on permanent local authority or privately owned sites or are accommodated in housing, a significant number have no permanent base. Some of those in housing would prefer to live on a site.</p> <p>There has been a lack of reliable data for Gypsies and Travellers. However, the requirement to carry out accommodation assessments for Gypsies and Travellers (i.e. the GTAA that our advice to SEERA is based upon) is a step towards addressing this by carrying out research to quantify the level of need and to provide better qualitative information regarding the accommodation needs of Gypsies and Travellers.</p> <p>It is unlikely that the next census will provide any more accurate data for Travellers who do not have a permanent home and would unnecessarily delay an already lengthy process.</p>
SEEDA	General	No comments to make at this time.	Noted.
Brighton & Hove Green Party		Permanent and temporary sites should be provided in Brighton & Hove and East Sussex to meet Gypsies & Travellers needs and save money spent on enforcement in relation to unauthorised encampments.	The local authorities agree with this statement.
	Pitch numbers	Figure of 80 additional transit and permanent pitches is a gross underestimate of need	<p>The benchmarking exercises (undertaken by the local authorities and independently by SEERA) indicate that the overall level of need identified through the GTAA was robust (although the total requirement for 80 pitches needed discounting to only include needs for permanent residential pitches).</p> <p>The local authorities believe their assessment to be sound and based on the most reliable, hard information available. Ongoing monitoring will be undertaken, however, to assess the impact of additional provision and to identify any evidence of newly-arising needs.</p>

	Methodology	Call for SEERA to commission independent scrutiny of the data collected, and how it was collected and how assessed.	Independent benchmarking has been undertaken by SEERA using the DCLG's research consultant, Pat Niner (from the Centre for Urban and Regional Studies at the University of Birmingham). This has confirmed the conclusions reached by our own benchmarking exercise.
	Choice	Gypsies and Travellers should be able to choose to settle on a permanent site, but should also be able to continue their nomadic lifestyle through the provision of temporary sites and stopping places.	Agree. The current exercise is designed to help achieve this, and these objectives will be reflected in the local authorities' advice to SEERA.
	Implementation	Sites should have good facilities and be managed to a high standard. (France and Germany may be able to provide good examples of best practice for this.) Government should ensure local authorities provide sites and not simply identify them in the LDF. This should be backed up by central Government funding.	DCLG have produced draft guidance for the design and management of sites and any new sites will be developed in line with national and regional guidance. Proposals for site provision in Development Plan Documents will be tested to ensure that they are capable of being implemented. There is currently Government funding for the building and refurbishment of sites although the continuation of this funding in the future has not been confirmed.
	Others issues	Have called for the Travellers Strategy to be updated. Bins should be provided on informal sites. There should be Gypsy and Traveller awareness training for Councillors and schools, and 'green' education campaigns for Gypsies and Travellers.	The current administration in Brighton & Hove have requested this and officers will be taking it forward. Domestic bins and waste collection services are usually provided on encampments. Other suggestions have been noted.
Sussex Police	Pitch numbers	Confident that the calculations will have arrived at a suitable number of permanent pitches. No comment on the proposed number. Concerned that additional permanent sites will not resolve the issue of unauthorised camping.	The local authorities recognise that an adequate network of transit sites across the country is also needed to meet the travelling needs of Gypsies and Travellers. However, the provision of additional permanent sites across the country will help to meet the accommodation needs of many Gypsies and Travellers who currently have no permanent base and also help reduce the incidence of unauthorised camping.

Irish Travellers - married couple (Brighton & Hove)	Pitch numbers	Brighton & Hove needs about 10 pitches as this is approximately the number of travellers who are based in the city all year round. Up to 14 pitches would be good but only if split over two sites. 47 additional permanent pitches across the GTAA area sounds about right.	Support and comments noted.
	Distribution of pitches	It is not fair that some districts have a very low number of pitches, especially ones with a relatively high population and these places should have more pitches.	Comments noted. The issue of 'fairness' in terms of all local authorities sharing the responsibility for making adequate site provision is reflected in current government guidance and SEERA have also acknowledged this. Districts with a relatively low requirement may, at the Preferred Options stage, be asked to take some provision from those local authorities with very high requirements. At the same time, it would be very wasteful of resources to provide extra pitches in areas where Gypsies and Travellers do not want to live.
	Transit sites	The provision of a permanent site in Brighton & Hove is likely to reduce the demand for transit. Ideally, transit sites should be small but there should be one in every area.	Comments noted.
	Implementation	Sites should not be any bigger than 8-10 pitches. Location is important and Travellers do not want to live in unsuitable places such as next to a rubbish tip.	Comments noted. We will also be providing advice to SEERA on the strategic criteria that should guide the location of suitable sites.
English Traveller Woman (Brighton & Hove)	Pitch numbers	Lots of additional pitches are needed in the area but not too many on one site (no more than about 12) 47 additional permanent pitches across the GTAA area seems to be about the right level. If more permanent sites were available, less Travellers would come into the city	Comments noted.
English Traveller Woman (Brighton & Hove)	Pitch numbers	Not sure how many permanent pitches are needed in Brighton & Hove but would expect it to be more than 14, possibly about 20. However, if more sites are provided everywhere, this is less predictable. Lots of Travellers like living in Brighton & Hove and would like to stay here.	The pitch allocation for Brighton & Hove is based on local monitoring evidence of Gypsy and Traveller households based locally. This will continue to be monitored. Other comments noted.

Traveller Woman (Brighton & Hove)	Pitch numbers	11-14 permanent pitches in Brighton & Hove spread over two sites sounds like the right amount. There are about 14/15 families based permanently in and around Brighton & Hove. Wouldn't recommend more than 14 pitches as would want them to be available to Travellers who live and are known locally	Support and comments noted.
	Transit sites	If more permanent sites are built the need for transit will probably be reduced. Should keep Horsdean available for people who are passing through the city and this will probably be enough to meet transit need.	Comments noted.
Irish Traveller Woman (Brighton & Hove)	Pitch numbers	47 additional permanent pitches does not seem to be enough and a lot more are needed. 11-14 pitches in Brighton & Hove is not enough either.	The local authorities' assessment of need across the GTAA area is based upon local knowledge and evidence of need and also informed by the survey data collected through the GTAA. The pitch allocation for Brighton & Hove is based on local monitoring evidence of Gypsy and Traveller households based locally.
	Distribution	Seems to be a fair distribution as there are more Travellers in Brighton & Hove.	Comments noted.
	Housing	There are lots of Travellers living in housing who would rather be able to live on a site. As Traveller's children who live in housing grow up a lot of them may choose to pursue a travelling lifestyle.	Comments noted.
	Transit sites	More transit site provision across the area will be needed in addition to additional permanent pitches.	Comments noted. There is likely to be a further exercise to determine transit needs across the region in SEERA's next review of the South East Plan.
	Implementation	Sites should be near to schools, shops and other facilities.	Comments noted – these considerations will be very important in assessing potentially suitable sites.