

## Partial Review of the South East Plan



## Meeting the Accommodation Needs of Gypsies and Travellers – July 2007





## Executive summary

The South East England Regional Assembly (SEERA) is reviewing the South East Plan and is looking to local authorities to provide advice on the accommodation needs of Gypsies and Travellers in their area. East Sussex County Council, the borough and district councils in East Sussex and Brighton & Hove City Council have agreed to work together in advising SEERA.

Before finalising our joint advice, we are seeking the views of local stakeholders on our draft proposals. These consultations are being organised separately in East Sussex and Brighton & Hove because the Traveller population is generally quite different in each area.

The main aim of our work is to advise the Assembly on how many extra caravan pitches are needed over the ten-year period from 2006 to 2016. The revised South East Plan will include binding targets on the number of permanent pitches that councils must plan to meet through their local development frameworks. Having received our advice, SEERA will organise a further round of wider public consultations on its emerging proposals next May.

Generally, while the extent to which they travel varies, there are too few sites available to meet Gypsies' and Travellers' accommodation needs. This shortage of sites leads to Travellers living on unauthorised sites<sup>1</sup> which can exacerbate tensions with the settled community.

The *East Sussex Traveller Strategy*, which was adopted last year, aims to promote community cohesion and to protect the rights and needs of both the settled and travelling communities. The strategy acknowledges that Gypsies and Travellers have a right to a nomadic life style, to equal access to services (such as education, health and accommodation) and to protection from discrimination and harassment.

In East Sussex and Brighton & Hove, there is a modest but unmet need for additional permanent residential and transit pitches. The nature and extent of these needs was fully assessed for the first time in the Gypsy and Traveller Accommodation Assessment (GTAA) that was carried out by consultants in 2005 and published as the *East Sussex and Brighton & Hove Gypsy and Traveller Study*.

In advising the Assembly, SEERA wants authorities to distinguish between the need for permanent residential pitches and the demand for transit provision.

As far as permanent sites are concerned, we have been asked to advise the Assembly on the total number of pitches needed over the two five-year periods, 2006-11 and 2011-16. We have also been asked to provide two spatial (district-level) distributions of this overall requirement, with:

- the first distribution (Option A) reflecting needs where they arise; and
- the second distribution (Option B) representing a more sustainable distribution that reflects a wider range of social, economic and environmental issues.

In addition, SEERA has requested more qualitative advice on the demand for transit provision and how this might be affected by any increase in permanent pitches.

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<sup>1</sup> This includes unauthorised developments on land which Gypsies and Travellers own but for which they don't have the required planning permission, as well as unauthorised encampments.

In considering needs, our starting point has been the detailed needs model set out in our GTAA. We have reviewed this assessment in accordance with the detailed benchmarking criteria set out in more recent Government advice on *Preparing Regional Spatial Strategy reviews on Gypsies and Travellers*. The conclusions of our own benchmarking exercise have subsequently been confirmed by a similar independent audit that SEERA has commissioned of all GTAA's in the region.

The needs model presented in our Traveller Study did not distinguish between the needs for permanent and transit pitches. Adjusting for this is the single most important change we have needed to make in order to separate out requirements for additional permanent pitches. Discounting for transit needs in this way accounts for all of the apparent reduction in requirements - from a total of 80 pitches of all types, to a total of 47 extra permanent pitches that are needed over the next five years.

The two draft distributions of this total requirement for permanent pitches are given below.

	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
<b>Total requirement</b>	<b>47</b>	<b>47</b>

The effect of seeking a more sustainable distribution would be to transfer some provision to the more rural areas of Rother and Wealden and away from Brighton and Hove. However, the two distributions are strikingly similar (even though the options have been developed quite differently), and while Option B implies a shift of around 6 percentage points away from Brighton & Hove, these difference are fairly small in absolute terms.

Our assessment of longer-term needs suggests that no more extra pitches will be required in the subsequent five-year period to 2016. Once the existing backlog of unmet needs has been met, vacancies on existing sites should be sufficient to cover any newly-arising needs from household growth and transfers from housing.

Consultations in East Sussex are being co-ordinated by the County Council and we would welcome feedback by 26 August on our joint proposals for the level and distribution of permanent pitch provision.

We are required to provide our joint advice to SEERA by 15 October 2007. The Assembly will then develop its own 'preferred options' and co-ordinate much more extensive public consultations on these options in May next year, before submitting its final draft proposals to Government.

# Partial Review of the South East Plan

## Meeting the Accommodation Needs of Gypsies and Travellers

### 1 Introduction

The South East England Regional Assembly (SEERA) is reviewing the South East Plan to include policies on meeting the accommodation needs of Gypsies and Travellers. This meets SEERA's commitment in its draft South East Plan to develop regional policy on this issue as a priority. Establishing an overview of needs across the region and identifying the number of pitches required in each local authority area will also meet the requirements of Government policy in Circular 1/2006 on *Planning for Gypsy and Traveller Caravan Sites*.

Once finalised, the South East Plan will become the new Regional Spatial Strategy (RSS) for the South East. It will guide development over the next 20 years to 2026, setting out strategic planning policies to influence and direct the preparation of local development frameworks throughout the region.

### Consulting on the options

SEERA has asked local authorities to work together in providing information and advice to help it develop policies for meeting the needs of Travellers for caravan sites. Although it has also requested some other information, the main aim of the work is to advise the Assembly on needs for extra caravan pitches over the ten-year period from 2006 to 2016.

East Sussex County Council, the borough and district councils in East Sussex and Brighton & Hove City Council have agreed to work together in providing joint advice to SEERA. We have produced this paper to enable residents and other local stakeholders to comment on our draft proposals before finalising our advice to the Assembly. Although there is no formal requirement to consult at this early stage, informing and seeking inputs from local stakeholders helps to raise awareness and meets the commitment in our Traveller Strategy to develop policies in an open manner.

Consultations are being organised separately in East Sussex and Brighton & Hove. This is largely because the Traveller population varies between the two areas, with the needs of traditional Gypsies predominating in East Sussex. Consultations in East Sussex are being co-ordinated by the County Council.

Feedback is invited by 26 August on the local authorities' joint proposals for the overall level and distribution of permanent pitch provision. Comments should be sent to:

Accommodation Review for Gypsies and Travellers  
Transport and Environment Department  
East Sussex County Council  
County Hall, St Anne's Crescent  
LEWES, BN7 1UE

Comments can also be sent by e-mail to: [TravellerReview@eastsussex.gov.uk](mailto:TravellerReview@eastsussex.gov.uk)

Unfortunately, the tight timetable is necessary to give the our Members Steering Group sufficient opportunity to consider all the responses received at its next meeting on 11 September – when it will need to agree our final joint advice to the Assembly (which has to be submitted by 15 October).<sup>2</sup>

We are also arranging a number of face-to-face meetings to discuss our draft proposals with certain key stakeholders (including Gypsies and Travellers and representatives of travelling show people) that have a more direct interest in the process. The proposals will also be discussed at the next meeting of the East Sussex Traveller Forum on 9 August.

Before finalising its own review proposals and submitting these to Government, SEERA is intending to organise extensive public consultations on its 'preferred options' throughout the region over a 12-week period from May 2008.

Once binding targets for future pitch provision have been set in the revised South East Plan, local planning authorities will also need to consult widely on any Traveller site allocations that they might need to bring forward in preparing their local development framework.

## **Further information**

This consultation document summarises the work we have carried out. Technical papers giving more detail about how we have developed our consultation proposals for the level and distribution of permanent pitches can be downloaded from the County Council's website at [www.eastsussex.gov.uk/environment/southeastplan/travellers/default.htm](http://www.eastsussex.gov.uk/environment/southeastplan/travellers/default.htm)

## **The East Sussex Traveller Strategy**

All Travellers may be nomadic but the extent to which they travel varies. Although most families are now settled in housing or on long-term residential caravan sites, many still travel for at least part of the year for work or for family occasions. Generally, however, there are too few sites available to meet their accommodation needs.

Caravan sites require planning permission and, to gain approval, proposals for such sites must be consistent with local planning policies. Partly due to the shortage of authorised sites, some Travellers live on unauthorised developments where they own the land but do not have the necessary planning permission.

A significant number of Travellers have no permanent base and move constantly, often against their will. The shortage of available pitches is one of the most important problems they face and is the reason why some have to stay on the move. This part of the Traveller community has the poorest health and educational outcomes of any minority group and can often be the target of local hostility and misrepresentation.

Tensions are most likely to arise in association with unauthorised camping. Negative perceptions are not helped by a small minority of Travellers who may commit anti-social acts, and widespread prejudice against Gypsies is reinforced by media coverage that is largely negative and often sensationalist.

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<sup>2</sup> The joint advice that our Members Steering Group agrees should be given to SEERA will then need to be formally ratified by each local authority before the submission date of 15 October.

It was in this context that the county and district/borough councils recently adopted the *East Sussex Traveller Strategy* to promote community cohesion and to protect the rights and needs of both the settled and travelling communities. The strategy was developed with input from Sussex Police, local health trusts, voluntary organisations and travellers themselves.

The strategy acknowledges that Gypsies and Travellers are ethnic groups recognised by the Race Relations Amendment Act. They have a right to a nomadic life style, to equal access to services (such as education, health and accommodation) and to protection from discrimination and harassment. In identifying many of the issues faced by Travellers, it also outlines an action plan for agencies to work together to meet their needs.

Further information about Travellers and the *East Sussex Traveller Strategy* is available on the County Council's website at [www.eastsussex.gov.uk/community/travellers/default.htm](http://www.eastsussex.gov.uk/community/travellers/default.htm)

## **2 Planning for the needs of Gypsies and Travellers**

The 2004 Housing Act and Circular 1/2006 have put in place a meaningful framework for addressing Travellers' accommodation needs. In developing their housing strategies, local authorities are now required to assess the accommodation needs of Gypsies and Travellers; and, in preparing their local development frameworks, they must allocate sufficient land for the caravan sites and pitches that are needed in their area. Providing these extra sites should remove one major cause of friction between the two communities – unauthorised developments and unauthorised encampments.

The new process requires:

- local authorities to assess the need for Gypsy and Traveller accommodation at the same time as they assess general housing requirements in their area;
- councils to then develop a strategy for addressing the needs identified in their GTAA, through public or private provision;
- SEERA to set out in the South East Plan (the RSS) how many pitches are required across the region and how many must be provided in each local authority area; and
- local authorities to identify and allocate sufficient sites in their local development frameworks to meet the target requirements established in the RSS.

### **SEERA's brief**

Circular 1/2006 requires regional planning bodies like SEERA to work closely with the local authorities in their region to determine the number of pitches required in each area.

SEERA has produced a *Brief for Submission of Advice by Local Authorities* on the level of provision required for permanent and transit caravan sites to meet both the current needs of Gypsies and Travellers (including any existing backlog of unmet need) and any further needs arising over the period to 2016. This brief can also be viewed on the County Council's website.

SEERA has emphasised that local authorities' advice must be underpinned by a robust evidence base in the form of a Gypsy and Traveller Accommodation Assessment (GTAA). The GTAA for this area was carried out for the local authorities by David Couttie Associates. It has been published as the *East Sussex and Brighton & Hove Gypsy and Traveller Study – Final Report 2005* and is also available on our website. It was commissioned in advance of Government advice and, like many others, does not identify requirements at district level. SEERA's brief recognises that some authorities will therefore need to interpret the findings of their accommodation needs assessment in order to advise on district-level provisions.

SEERA's brief also emphasises that authorities should distinguish between the need for permanent residential and transit pitches. However, it accepts that it may not always be possible to give estimates of transit needs for individual authorities or wider GTAA areas. The Assembly is therefore looking for more qualitative advice on the demand for transit provision and how this might be affected by a future increase in the number of permanent residential pitches. We are still working on developing this advice on additional transit needs in this area.

### **Developing options for future provision**

The Assembly has requested that the local authorities work in partnership to provide two spatial (i.e. district-level) distributions for a single proposed level of permanent pitch provision in our area:

**Option A** – should give a distribution which reflects needs where they arise (as identified through the GTAA and other evidence).

**Option B** – should give a more sustainable distribution that takes account of a wider range of social, economic and environmental considerations.

We have established a Members Steering Group to guide our work in developing joint advice to SEERA. This group includes an elected member from each of the local authorities and representatives from Sussex Police and the Sussex Association of Local Councils (SALC).

Officers from all the local authorities have been working together to identify the overall number of permanent residential caravan pitches that are needed in this area and the two spatial options for distributing this total provision between districts.

### **Existing provision**

There are currently five public sector Traveller sites in the county. These are owned and managed by East Sussex County Council and provide a total of 26 pitches for permanent residential use and 10 transit pitches for more temporary needs (including emergency stopping places). Details of these sites are given below.

### Current provision for Gypsies and Travellers on public sector sites

Location	District	Type of site	Pitches	Caravan capacity
Southerham	Lewes	Transit	10	10
Robertsbridge	Rother	Permanent	7	7
Hailsham	Wealden	Permanent	5	5
Maresfield	Wealden	Permanent	8	16
Polegate	Wealden	Permanent	6	12
<b>Total transit</b>			<b>10</b>	<b>10</b>
<b>Total permanent</b>			<b>26</b>	<b>40</b>

In addition to these local authority sites, there are another six, small, privately-owned, permanent sites in Wealden with planning permission for a total of 15 caravans.

In Brighton & Hove, there is one authorised transit site at Horsdean. This has a capacity for 46 caravans on 23 pitches and is currently being refurbished.

### **3 Assessing the need for permanent pitches**

SEERA are seeking advice on the total number of permanent pitches that are needed in this area for two five-year periods, 2006-11 and 2011-16. This section looks at requirements in the first five years from 2006; longer-term needs after 2011 are considered in Section 7.

Our starting point for providing this advice is the GTAA carried out for this area in 2005 by David Coultie Associates (DCA). Section 5 of DCA's report presents a 'needs accommodation model' that estimates the overall requirement for additional pitches over the first five-year period from 2006-2011. That assessment also draws on the twice-yearly caravan counts that local authorities report to the Department for Communities and Local Government (DCLG) as well as on the findings of the special survey DCA carried out for our accommodation assessment.

More recently, the Government has published further advice on *Preparing Regional Spatial Strategy reviews on Gypsies and Travellers*. This includes a series of 'benchmarking' questions to help regional planning bodies evaluate the different GTAAs that have been carried out in their region.

To try and achieve a consistent approach, SEERA has asked the local authorities to critically review the findings of their own accommodation assessment, using this official checklist of questions. As a further check, the Assembly has also commissioned consultants to carry out an independent benchmarking exercise looking at all the GTAAs undertaken in the South East. This further audit is being led by Pat Niner from the Centre for Urban and Regional Studies, applying the same benchmarking criteria that her team developed for the Government's guidance.

## **Discounting for transit needs**

In advising SEERA, local authorities have been asked to clearly distinguish between needs for permanent pitches and transit provision. As far as permanent requirements are concerned, we have been asked to advise on the total number of pitches required and how these should be distributed between districts. For transit needs, SEERA has requested a more qualitative assessment of the demand for transit provision and how this might change in future as a result of more permanent pitches becoming available.

DCA's detailed needs model (presented on page 77 of their final report) does not distinguish between the needs for permanent and transit pitches. Adjusting for this has required the local authorities to look more closely at the allowances we should make for any needs associated with unauthorised camping. While DCA's assessment assumes that all Gypsies and Travellers on unauthorised encampment require some type of provision, only a proportion of these households are likely to need a permanent pitch. For other households on such encampments, who may just be passing through the area or only visiting for a relatively short-time, additional transit provision might be more appropriate.

DCA's original assessment indicated a requirement for an extra 54 pitches in total to meet all needs associated with the levels of unauthorised camping evident in July 2005. Having looked at this in more detail, the local authorities consider that 20 pitches out of this total are required by Traveller households needing a permanent residential site in East Sussex and Brighton & Hove.

In East Sussex, monitoring information suggests that 12 households living on unauthorised encampments in the county need permanent pitches. This represents around 70% of the total number of 17 households that it is estimated were on unauthorised encampments in East Sussex at the time of the assessment.

In Brighton & Hove, the City Council believes that monitoring records and local information regarding unauthorised encampments indicate a need to accommodate 8 households on permanent pitches.

## **Adjusting our original needs assessment**

In looking at further needs for permanent caravan pitches, we need to take account of the following key issues:

- the existing backlog of unmet need for pitches;
- newly-arising needs for further pitch provision over the next five years; and
- the flow of existing pitches that might become vacant to help meet such needs.

This is the approach set out in detail on page 77 of DCA's final report and summarised on page 81. It suggests an overall requirement to provide an extra 80 pitches (2006-11) but, as highlighted above, this total does not distinguish between the needs for permanent and transit pitches.

As well as discounting transit needs, we have made a number of other detailed changes to DCA's original assessment. These other adjustments are in keeping with the results of our detailed benchmarking exercise which has itself been validated by Pat Niner's further, more recent audit for SEERA.

However, the adjustment made to only include requirements for permanent pitches is by far the most significant of all the changes made. Discounting for transit needs in this way 'reduces' the overall needs estimate by 34 pitches – from an original total of 80 pitches (of all types) to an adjusted requirement for a further 46 permanent residential pitches.

In contrast, the other changes that we believe should be made to DCA's assessment effectively cancel each other out – so that their overall net impact is to increase the total requirement for permanent pitches by just one, from 46 to 47 pitches. These other adjustments are necessary to avoid:

- over-estimating the likely future supply from existing pitches becoming vacant;
- over-estimating future levels of household formation; and
- some double-counting between different elements of the needs model.

### **Our revised needs assessment**

A more detailed account of our approach to determining the overall need for permanent pitches (and the Option A 'need-based' distribution of this total) is given in a background paper, *Towards a baseline distribution of future pitch provision*, that is available on the County Council's website. This paper includes information on all the changes we have made to DCA's needs assessment. It also presents (in two annexes) the conclusions of the joint authorities' own benchmarking exercise and the results of Pat Niner's similar independent audit of our GTAA for SEERA.

Our revised assessment suggests the need to provide another 47 permanent pitches in East Sussex and Brighton & Hove as detailed in the table below.

#### Total requirements for permanent pitches, 2006-2011

<b>Need/supply</b>	<b>Number of pitches</b>
Households seeking to transfer from dwellings to permanent caravan sites	5
Households on unauthorised encampments (that need a permanent pitch)	20
Households on unauthorised developments (that are not expected to gain planning permission)	8
Concealed households	12
Existing backlog of unmet needs in 2006 (sub-total)	45
Newly arising needs from family formation, 2006-11	12
<b>Gross need for permanent pitches, 2006-2011</b>	<b>57</b>
Expected vacancies on existing sites, 2006-2011	10
<b>Net need for additional permanent pitches, 2006-2011</b>	<b>47</b>

## 4 Option A – a needs-based distribution of the overall requirement for permanent pitches

### Distributing the baseline requirement for 2006-2011

In many cases, the same information that has been used to inform our assessment of the backlog of existing needs for permanent pitches can be used to disaggregate figures for the whole area to each local planning authority. Where this is not possible, we have used other sources – including Travellers’ own stated preferences for where they would most like to live as the basis for distributing our adjusted figures. These preferences come from DCA’s survey and are summarised in Table 5.2 on page 81 of our GTAA.

Because Pat Niner, in her assessment for SEERA highlighted a number of problems with DCA’s estimate of household growth to 2011, we have needed to take a different approach in looking at newly-arising needs from further family formation over this period. This has meant assuming an annual household growth rate of 3% per year (as suggested by Government guidance) and applying this to our adjusted district estimates of all Gypsy and Traveller households needing permanent accommodation at the 2006 base date.

All the information we have used to disaggregate requirements between areas is summarised in the following table.

#### Information sources for disaggregating our needs assessment for permanent pitches

<b>Need/supply</b>	<b>Basis for disaggregation</b>
Households seeking to transfer from dwellings to permanent caravan sites	Distribution of Gypsies’ and Travellers’ own stated preferences for where they would like to live (Table 5.2. of the GTAA).
Concealed households	
Households on unauthorised encampments (that need a permanent pitch)	City Council identified the requirement for Brighton & Hove. East Sussex total distributed in accordance with the July 2005 Caravan Counts.
Households on unauthorised developments (that are not expected to gain planning permission)	The actual location of these developments (in Lewes and Wealden).
Newly arising needs from family formation, 2006-11	Calculated on the basis of an assumed 3% annual growth rate in households on permanent pitches.
Expected vacancies on existing sites, 2006-2011	The distribution of the existing supply of permanent pitches (in Rother and Wealden).

The different elements of our disaggregated needs model are brought together in the table on the next page to present Option A – the final needs-based distribution of permanent pitches required by 2011.

## Option A – The needs-based distribution of permanent pitches, 2006-11

	Estimated needs arising from:				Expected vacancies, 2006-11	Option A
	Unauthorised encampments	Unauthorised developments	Concealed households & transfers from housing	Family formation, 2006-11		
Eastbourne	0	0	1	0	0	1
Hastings	2	0	1	0	0	3
Lewes	6	2	1	1	0	10
Rother	0	0	3	2	-2	3
Wealden	4	6	7	7	-8	16
Brighton & Hove	8	0	4	2	0	14
East Sussex	12	8	13	10	-10	33
<b>GTA A area</b>	<b>20</b>	<b>8</b>	<b>17</b>	<b>12</b>	<b>-10</b>	<b>47</b>

## **5 Option B – a more sustainable distribution of the overall requirement for permanent pitches**

### **Distributing the baseline requirement for 2006-2011**

In providing a second possible distribution of the overall requirement for permanent pitches, Option B is meant to represent a more sustainable approach that balances the needs-led approach by considering a wider range of social, economic and environmental concerns. SEERA characterise Option B as a distribution:

*which seeks to protect and enhance the natural environment, including its biodiversity and landscape character whilst making best use of previously developed land and existing or planned infrastructure provision; and facilitates access to employment opportunities and local services to support social inclusion.*

Again, in developing this second option, our method is consistent with Government's recent advice on *Preparing Regional Spatial Strategy reviews on Gypsies and Travellers*, as well as with SEERA's brief and other relevant guidance.

The Government guidance stresses that there is no right 'technical' answer, but that the pitch distribution should seek to achieve *a sustainable outcome which balances the needs of all communities within general planning principles*. Consistent with that requirement, our approach to developing Option B incorporates relevant planning considerations while also taking account of the needs, demands and preferences of the Gypsy and Traveller community.

We believe our approach results in a sustainable distribution because it balances:

- a) the distribution of needs and preferences for sites across our area; with
- b) with opportunities (particularly in terms of access to education and health services) and environmental constraints on meeting requirements in each authority's area.

A more detailed account of our approach which is summarised below is given in a background paper on *Developing a more sustainable distribution of future pitch provision* that is available on the County Council's website.

Work on developing Option B has been carried out independently of parallel work looking at Option A. The Option B distribution has also been developed in terms of the percentage shares of the overall requirement that should be provided in each local planning authority. In this way, it could be applied to any overall target for permanent pitch provision in the GTAA area.

## Assessing needs and preferences

As a first step we have looked at the current distribution of needs and preferences for sites provision based on:

- preferences for ideal site locations as expressed by Gypsies and Travellers in the GTAA (Table 5.2, page 81);
- the distribution of authorised pitches in July 2006; and
- the location of caravans on unauthorised sites in July 2006.

Each of the figures has been expressed as a percentage, with an average of the three figures being calculated to provide one overall relative indicator of needs and preferences for each area.

### Estimating relative needs and preferences for permanent pitches

	Brighton & Hove	Eastbourne	Hastings	Lewes	Rother	Wealden
Ideal site locations	20.8%	5.7%	8.5%	6.5%	16.0%	42.5%
Authorised pitches	33.3%	0%	0%	14.5%	10.1%	42.0%
Unauthorised caravans	61%	0%	1%	29%	0%	9%
<b>Average indicator</b>	<b>38%</b>	<b>2%</b>	<b>3%</b>	<b>17%</b>	<b>9%</b>	<b>31%</b>

## Assessing opportunities and constraints

The next step involves assessing land potentially available for the development of new caravan sites by:

- estimating the total amount of undeveloped land in each authority's area;
- subtracting from this total the area covered by absolute environmental constraints (which we consider to be land at flood risk and Sites of Special Scientific Interest);
- to give the total amount of land it might be feasible to develop.

The potential suitability of this land for development has next been assessed by reference to maps that show which areas are easily accessible to schools, colleges and GP services. In developing this 'accessibility factor', we also looked at access to employment

but found no significant differences here between districts. These maps can also be viewed on the County Council's website.

To summarise the percentage of accessible land in each district, we have calculated the average of the percentage figures that measure the amount of land in each area which falls within the defined 'isochrone' (accessible area) for each of the three factors.

Applying these accessibility factors to our estimates of the amount of undeveloped land in each area that is not covered by absolute environmental constraints results in another measure which shows how much accessible land is potentially available for development in each area.

However, one further adjustment is needed to reflect the incidence of land which falls within Areas of Outstanding Natural Beauty (AONB). As Circular 1/2006 makes clear, while AONB designation does represent a constraint, it should not be viewed as an absolute constraint.

To take account of the two AONBs, we have calculated a further factor to reduce our estimate of the developable and accessible land that is potentially available in each area for new Gypsy and Traveller sites. While these factors reflect the extent of AONB coverage in each area, they have also been weighted to reflect the fact that the open landscape of the Sussex Downs is potentially more vulnerable to harmful impacts from development than the High Weald.

Applying this further AONB factor to our estimates of developable and accessible land results in a final estimate of the total land that is potentially available in each area to meet the needs of Gypsies and Travellers for additional permanent pitches. These figures are then converted into percentages to give our final measures of the relative opportunities for potential development.

Each step in this process is summarised in the table below.

[Estimating relative opportunities for and constraints on providing new caravan sites](#)

	Brighton & Hove	Eastbourne	Hastings	Lewes	Rother	Wealden
Land it might be feasible to develop	4,550 hectares	1,051 hectares	881 hectares	21,376 hectares	32,052 hectares	60,471 hectares
Accessibility factor	75%	75%	85%	35%	27%	27%
Developable and accessible land	3,412 hectares	788 hectares	749 hectares	7,481 hectares	8,654 hectares	16,327 hectares
AONB factor	0.6667	0.73	0.93	0.6667	0.70	0.73
Land potentially available for development	2,275 hectares	575 hectares	697 hectares	4,987 hectares	6,058 hectares	11,919 hectares
<b>Relative distribution</b>	<b>9%</b>	<b>2%</b>	<b>3%</b>	<b>19%</b>	<b>23%</b>	<b>45%</b>

## Balancing needs and preferences with opportunities and constraints

The final stage of our approach to developing Option B is to balance our two distinct assessments of needs/preferences and opportunities/constraints. Again, for transparency, we have opted for the simple method of averaging out the two distributions to give a more balanced, sustainable distribution.

### Option B – the relative distribution of future requirements

	Brighton & Hove	Eastbourne	Hastings	Lewes	Rother	Wealden
<b>Option B (percentage distribution)</b>	<b>24%</b>	<b>2%</b>	<b>3%</b>	<b>18%</b>	<b>15%</b>	<b>38%</b>

### Translating Option B into pitch requirements

To provide SEERA with the second distribution of permanent pitches, we have to translate Option B into pitch numbers by applying the percentage figures for each area to the overall requirement for 47 pitches (as shown in the following table).

### Option B – A more sustainable distribution of permanent pitches, 2006-2011

	Option B	
	Percentage distribution	Number of pitches
Eastbourne	2%	1
Hastings	3%	1
Lewes	18%	9
Rother	15%	7
Wealden	38%	18
Brighton & Hove	24%	11
East Sussex	76%	36
GTA A area	100%	47

## 6 Summarising the options

As shown in the table below which compares Options A and B, the effect of seeking a more sustainable distribution would be to transfer some provision to the more rural areas of Rother and Wealden and away from Brighton and Hove.

However, perhaps the most striking aspect of the distributions is their marked similarity, even though the two options have been derived from quite different models. While Option B does imply a shift of around 6 percentage points away from Brighton & Hove and to East Sussex (compared to the needs-based distribution), in terms of absolute numbers these differences are quite small.

## Options A and B – draft provision figures, 2006-2011

	Number of permanent pitches		Distribution of pitches	
	Option A	Option B	Option A	Option B
Eastbourne	1	1	2%	2%
Hastings	3	1	6%	3%
Lewes	10	9	21%	18%
Rother	3	7	6%	15%
Wealden	16	18	34%	38%
Brighton & Hove	14	11	30%	24%
East Sussex	33	36	70%	76%
GTAAs area	47	47	100%	100%

Taking each area in turn, it appears that:

- Although Eastbourne has no existing provision, it also has virtually no pressure for sites and very little potential because of its enclosure by the South Downs and extensive areas of flood risk.
- Hastings also has no existing sites and, like Eastbourne, relatively little available land. There is, however, some evidence of a regular demand for a few pitches.
- There is little difference in the two options for Lewes where relatively high levels of unauthorised camping may be met by permanent pitch provision to complement the district's existing transit site.
- Rother has the greatest AONB coverage and no recorded pressure from unauthorised sites. However, some provision is a reasonable reflection of the level of stated preferences from the travelling community and the possibility of small-scale opportunities.
- While Wealden is the largest district in East Sussex, it is also partly affected by both AONBs. It also has the largest travelling population on both authorised and unauthorised pitches and is regarded as the most desirable location by many Gypsies. It is, therefore, understandable that both options afford the district the highest proportion of pitches.
- Brighton and Hove has a sizeable number of pitches on one authorised transit site and the largest number of caravans on unauthorised sites. It is also tightly constrained by the Sussex Downs AONB. While the seasonal nature of unauthorised encampments identifies a need for transit pitches, the lower share of permanent provision suggested by Option B would seem to reasonably reflect the city's capacity and Travellers' stated preferences.

Another factor that is not yet well reflected by either option concerns equity and choice. Government guidance suggests consideration should also be given to the range of accommodation options, with specific reference to tenure and mix of urban and rural locations.

Although existing provision is heavily skewed towards public sector sites, the GTAAs found that around half of Gypsies and Travellers living on sites would ideally like to live on a private site owned by themselves or another member of their family.

At present, neither of the borough councils in East Sussex (Eastbourne and Hastings) have a site, and there may be a case for some provision in either (or both) these areas to provide a better choice of urban and rural locations across the area.

Government advice suggests that proposed provision figures should be rounded to the nearest five pitches, and comments would be welcomed on whether this would be appropriate for our area.

## **7 Longer-term requirements to 2016**

SEERA have also requested advice on the need for permanent pitch provision for the further five-year period to 2016. If the existing backlog of unmet needs has been met by 2011, additional provision for the period from 2011-16 should only be required to cater for:

- further transfers of households moving from bricks and mortar housing to permanent sites; and
- future family formation amongst households on permanent sites.

As far as transfers from housing are concerned, we believe it is reasonable to make the same assumption for the five years after 2011 as for the preceding period – that there will be a demand for an extra five permanent pitches as a result of such transfers.

In estimating future family formation, the same approach has also been taken as for the earlier five-year period - applying the 3% annual household growth rate to the total number of Traveller households that we anticipate will be living on permanent pitches in this area by 2011. This would result in an additional 13 households and, together with transfers from housing, suggests a gross requirement for an extra 18 permanent pitches, 2011-16.

However, as for the earlier period, we also need to discount from this gross figure a reasonable allowance for pitches within the existing permanent stock at 2011 that are likely to become vacant (and available to meet newly-arising needs) over the next five years.

For the previous period (and based on the survey results and past experience), we estimated that 2 pitches out of the 35 permanent pitches available in 2006 would become vacant each year. This equates to a vacancy rate of just under 6%.

By 2011, we can expect the existing stock to have increased to a total of 82 permanent pitches, with 47 extra pitches having been provided as a result of this process. Applying this same vacancy rate to our anticipated stock of 82 permanent pitches in 2011 suggests that nearly 5 pitches could be expected to become available each year to meet longer-term demands. Over the 5 years to 2016, this would mean some 23 pitches becoming vacant – thereby obviating any need for any additional pitch provision beyond 2011.

## **8 Future process and timetable**

The local authorities are required to provide their joint advice to the Regional Assembly by 15 October 2007.

Although we have been asked to advise SEERA on two distributions of the overall requirement for permanent pitch provision, we are not required to indicate a preference for one of the distributions. As well as auditing our technical work and the approach we have taken to developing our advice, SEERA will carry out a sustainability appraisal of the advice it receives and aims to draft its own 'preferred options' document by the end of this year.

The Assembly also intends to hold a 12-week public consultation on its preferred options in May – July 2008, before finalising its proposals and submitting its draft Partial Review document to Government at the end of next year. The Government will then need to hold a further round of statutory consultations and organise a subsequent 'Examination in Public' of key issues requiring further discussion before it can publish final policies for Gypsies and Travellers in the revised South East Plan.

The necessary stages and length of the statutory planning process mean it will be late-2009 before future pitch requirements for each area become enshrined in the approved Regional Spatial Strategy. However, there is no reason why local planning authorities should wait so long before bringing forward and consulting on proposals for permanent and transit site provision to meet the identified needs of Gypsies and Travellers in their area.

In preparing their local development frameworks, local planning authorities should be developing the criteria they will include in their core strategies for the location of Gypsy and Traveller sites. They should use these criteria to guide site allocations in development plan documents and in determining planning applications for caravan sites.

Work has already started on developing consistent location criteria to help guide site allocations for our area and this will form part of the final advice we submit to SEERA in October. Also, as an added incentive for councils to identify and allocate the necessary sites, 100% capital funding is currently available from Government for local authorities that build new sites.