

Developing a more sustainable distribution of future pitch provision

1 Introduction

This document sets out the approach we have used in developing Option B - A Sustainable Distribution of Permanent Caravan Pitches for Gypsies and Travellers within East Sussex and Brighton & Hove.

It forms part of ongoing work to prepare advice to the South East England Regional Assembly (SEERA) in relation to its Partial Review of the South East Plan for the provision of Caravan Pitches for Gypsies and Travellers across the region. This Review will ultimately set down the number of additional residential caravan pitches that each local planning authority is to provide for in its Local Development Framework.

This paper explains:

- the context for the approach to the distribution;
- a full description of criteria employed in the methodology; and
- the figures used in each step of the statistical assessment.

In seeking to balance the needs and preferences of the Gypsy community with social, economic and environmental considerations, Option B constitutes the alternative more sustainable distribution to the needs based distribution, Option A.

In particular, the Regional Assembly sees 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.”*

2 Context

This option has been developed having full regard to advice in the recent Government Research Paper, *Preparing Regional Spatial Strategy reviews on Gypsies and Travellers (DCLG, March 2007)*, as well as to Circular 1/2006, the SEERA brief and other relevant guidance.

The key reference sources for preparing this advice are:

- *East Sussex and Brighton & Hove Gypsy and Traveller Study*, David Coultie Associates, 2005.
- ODPM Circular 1/2006 *Planning for Gypsy and Traveller Caravan Sites*, February 2006.
- *Brief for Submission of Advice by Local Authorities*, SEERA, December 2006.
- Briefing Note on *District Level Pitch Requirement Distribution and Options*, SEERA, March 2007.
- *Preparing Regional Spatial Strategy reviews on Gypsies and Travellers by regional planning bodies*, DCLG, March 2007.
- *Partial Review of the Draft South East Plan – Provision for Gypsy and Traveller Caravan Sites: Consultation Draft Sustainability Appraisal Scoping Report*, SEERA September 2006.

Circular 1/2006 states that sites in rural areas may be dealt with as “exceptions”. In Areas of Natural Beauty (AONBs) and other areas with national environmental designations, sites would be acceptable where they do not compromise the objectives of designation (paragraph 52). Rural settings are otherwise acceptable in principle, while sites on the edges of urban areas, where there are realistic alternatives to the car to access local services, are suggested (paragraph 54). Further sustainability criteria are included at paragraphs 64-66. It also looks to utilise the potential of surplus public land and encourages co-operation between adjoining LPAs, especially in areas where there are strict planning constraints (paragraph 35). The need for additional sites, as measured by the level of unauthorised pitches and via the Gypsy and Traveller Accommodation Assessment (GTAA), is clearly a prime consideration.

The CLG Research Paper focuses on assessing residential (as opposed to transit) pitch requirements. Its approach is essentially two-stage. It involves firstly identifying need where it arises (which is set out in the Option A distribution) and then considering the principles that influence a strategic view of needs across the region.

Step 6 in the DCLG Paper is the stage at which pitch allocation options are assessed. It stresses that there is no “technical” answer, but seeks to achieve “a sustainable outcome which balances the needs of all communities within general planning principles” (page 47).

It identifies five planning principles relevant to pitch distribution as follows.

- 1 Sustainability - This focuses on meeting the needs and realistic aspirations of Gypsies and Travellers. It also indicates that land suitable for residential use should also be suitable for Gypsy and Traveller sites and “land shortages” should not automatically rule out provision in local authorities if the other criteria can be met.
- 2 Equity and choice - This recognises that existing sites generate additional needs (such as through family growth and visitors) but seeks to avoid existing site locations determining future locations. It advocates a wider choice of authorised sites by size and tenure in a way that respects the diverse requirements of different groups.
- 3 Social inclusion - This highlights the need to foster social inclusion through positive search criteria such as access to employment, health and education services.
- 4 Environmental protection - Similar considerations should apply as for other residential accommodation, whilst respecting cultural needs. It highlights that some environmental factors act as constraints on development such as those with positive environmental designations and areas of flood risk.
- 5 Flexibility - This argues for a pragmatic and flexible approach and emphasises the need for monitoring and review.

A series of questions are also included to help consider pitch allocations between Local Planning Authorities in a systematic manner.

SEERA’s Consultation Draft Sustainability Appraisal Scoping Report is also relevant in that it is the first stage in preparing a Sustainability Appraisal (SA) for the Partial Review that will be undertaken by SEERA subsequent to receiving advice from Local Authorities across the region.

Its principal value is in identifying the sustainability issues in the Integrated Regional Framework (IRF) relevant to gypsies and travellers. Key issues are regarded as failure to deliver adequate sites, their very poor health and education status, and a need to build inclusive communities.

There are few regional datasets for gypsies and travellers, but the Scoping Report highlights the implications of various ‘Key Sustainability Issues’. These cover:

- enhancing the provision of adequate sites
- enhancing the health status of gypsies and travellers
- enhancing the education status of gypsies and travellers
- contributing to the creation of strong and stable communities

These issues are translated into questions in the Sustainability Appraisal Framework. While no indicators are identified, they have helped in determining criteria for use in developing Option B.

3 Methodology and criteria

In order to jointly fulfil the SEERA Brief for an Option B distribution the methodology devised started with consideration of the DCLG Research Paper and embraces the range of considerations in other guidance (notably Circular 1/07). It is formulated in a way that is both comprehensive and reflects the availability of relevant information. Essentially the method seeks a distribution expressed as percentages that balances the needs and preferences of the Gypsy and Traveller community with the relative opportunities and constraints for meeting them. The criteria and measures used are set out in Table 1 below.

To maintain a consistency with the DCLG Paper, the set of questions and sub-questions it contains, together with responses, are set out at Appendix 1.

The methodology is based on assessing the relative capacities of each area rather than absolute capacities. This provides an element of equity between Authorities and will also be robust for any variations in the total number of additional pitches to be provided.

Table 1 – Assessment Framework

| CRITERIA | MEASURE | KEY PRINCIPLE |
|--|--|---|
| Stage 1 Needs and Preferences | | |
| Distribution of needs and aspirations | Travellers ideal site locations Distribution of authorised pitches Distribution of unauthorised caravans | 1 Sustainability 2 Equity and choice |
| Stage 2 Opportunities and Constraints | | |
| Land Capacity | Undeveloped land area Less extent of: | 1 Sustainability 2 Equity and choice |
| Absolute Constraints | a) Flood risk areas b) SSSIs | 4 Environmental protection |
| | Feasibly developable land area, modified by accessibility to: | |

| | | |
|---|--|----------------------------|
| Accessible land | a) Schools b) Further Education c) General Practitioners d) Main employment centres | 3 Social Inclusion |
| | Developable and accessible land area adjusted to reflect extent and nature of AONBs: | |
| Relative Constraints | a) Sussex Downs b) High Weald | 4 Environmental protection |
| Stage 3 Sustainable Distribution | | |
| Balance of needs and preferences with opportunities and constraints | | |

In developing this framework in practice some of the criteria in the DCLG paper and Circular 1/06 have been simplified or excluded. The reasons for this are set out below.

- Any measure related to the distribution of future housing (referred to in the DCLG Paper under “Sustainability”) would not recognise that typically most growth in this area is in the existing urban areas, much of which would be brownfield, higher density development, possibly as flats, which is considered to have little bearing on gypsy site provision. No specific measure was therefore included, but the point is reflected in the measure of undeveloped land area in each area.
- In respect of unused public land (mentioned in Circular 1/2006) the amount of land identified on the Public Land Register was considered, but is small and is not considered significant in establishing a distribution - it may be more relevant as a means of delivery in specific cases. Hence, it has been excluded from this assessment.
- Issues of equity and choice in site provision relate as much to site tenure and site size as to geographical distribution. The geographic dimension is reflected in the land area basis for assessing relative opportunities and constraints. However, size and tenure are issues that can be considered at the end as an aspect of delivery.
- The DCLG Paper’s principle of flexibility is regarded as an operational principle which applies to the whole exercise and cannot be individually or specifically reflected in the assessment framework.

Overall, the approach seeks to be “sustainable” in that balances the distribution of needs and preferences for sites across the study area (stage 1) with opportunities (in terms of access to key services) and environmental constraints for meeting it in each authority’s area (stage 2). It is brought together in stage 3 to give the sustainable Option B distribution.

Stage 1 - an assessment of the distribution of needs and preferences – is taken as an average of:

- the distribution across the study area of the ideal site locations expressed by the Gypsies and Travellers from Table 5.2 of the GTAA;
- the relative distribution of authorised pitches at July 2006; and
- the distribution of caravans on unauthorised encampments at July 2006

Stage 2 is made up of several steps:

- The total undeveloped land (in hectares) in each authority’s area, reflecting their crude relative capacity to accommodate new development, is calculated. (This

assumes that suitable sites, normally brownfield, within existing urban areas are not likely to be found for Gypsies and Travellers.)

- This area is then reduced by subtracting the area covered by what are regarded as the absolute environmental constraints of flood risk and SSSIs.
- The “feasibly developable” land area for each authority derived from the above steps is then modified by an accessibility factor. This factor is calculated from the percentage of each Authority’s area that is accessible (within 20-30 minute travel times) to schools, Further Education establishments and GP services. The accessibility to main employment areas was assessed but not found to differentiate between the local authority areas and has been excluded from the assessment. The measure used is an average of the percentages of land in each area that is accessible to each of the three other factors.
- This accessibility factor is then applied to the undeveloped land area not covered by absolute constraints to give a relative measure of the feasibly developable and accessible land across the study area.
- The resultant area is reduced to take account of the constraint presented by AONB designations. This is based on the extent of AONB coverage in each area, but weighted to acknowledge that the open Sussex Downs landscape is potentially more vulnerable to impact from development than the High Weald.
- The resultant land areas (in hectares) are then converted into a percentage distribution across the study area as a modified measure of relative potential development opportunity.

Stage 3 is the final stage which combines the results of stages one and two to produce a balance between realistic demand expectations and relative sustainable opportunities to meet them. This is done by simply averaging the outcomes of the two stages.

4 Sustainable distribution

Summary of Option B distribution

The result of the work on developing the Option B sustainable distribution is set out in the table below. It expresses the distribution as a percentage for each of the local authority areas across the study area which can be used to distribute any overall number of permanent pitches between all the local authority areas in the study area.

The distribution percentages have been applied to the baseline total of 47 permanent pitches that has been derived from the work in developing the Option A distribution and this is also set out in the table below.

| | Option B distribution | Implied pitch numbers |
|-----------------|------------------------------|------------------------------|
| Eastbourne | 2% | 1 |
| Hastings | 3% | 1 |
| Lewes | 18% | 9 |
| Rother | 15% | 7 |
| Wealden | 38% | 18 |
| Brighton & Hove | 24% | 11 |
| East Sussex | 76% | 36 |
| TOTAL | 100% | 47 |

The following table brings together the results of all the separate stages of the method used to develop this Option B sustainable distribution following the assessment framework established above.

The section that follows this table explains the detailed statistical assessments undertaken.

Detailed results of each stage in developing the sustainable distribution

| | Brighton & Hove | Eastb'ne | Hastings | Lewes | Rother | Wealden |
|---|-----------------|--------------|-------------|---------------|---------------|---------------|
| Stage 1 - Needs and preferences | | | | | | |
| Ideal site locations | 20.8% | 5.7% | 8.5% | 6.5% | 16.0% | 42.5% |
| Authorised pitch locations | 33.3% | 0% | 0% | 14.5% | 10.1% | 42.0% |
| Unauthorised caravans | 61% | 0% | 1% | 29% | 0% | 9% |
| Average of each of the 3 indicators of demand | 38.4% | 1.9% | 3.2% | 16.7% | 8.7% | 31.2% |
| Stage 2 - Opportunities and Constraints (Capacity - hectares) | | | | | | |
| Total area | 8,538 | 4,553 | 3,083 | 29,439 | 51,828 | 83,631 |
| Undeveloped area Less absolute constraints: | 4,853 | 2,723 | 1,420 | 26,403 | 46,516 | 76,501 |
| a) Flood risk areas | 164 | 1,301 | 239 | 3,159 | 9,848 | 7,797 |
| b) SSSIs | 139 | 371 | 300 | 1,868 | 4,616 | 8,233 |
| Feasibly developable land | 4,550 | 1,051 | 881 | 21,376 | 32,052 | 60,471 |
| Accessible land | | | | | | |
| Percentage of Authority accessible to: | | | | | | |
| a) Primary & Secondary School | 75% | 75% | 85% | 40% | 35% | 35% |
| b) Further Education | 75% | 75% | 85% | 25% | 15% | 15% |
| c) General Practitioners | 75% | 75% | 85% | 40% | 30% | 30% |
| Average accessibility as % of area | 75% | 75% | 85% | 35% | 27% | 27% |
| Developable and accessible land (hectares) | 3,412 | 788 | 749 | 7,481 | 8,654 | 16,327 |
| AONB weighting | | | | | | |
| a) Sussex Downs | -33% | -27% | | -33% | | -7% |
| b) High Weald | | | -7% | | -30% | -20% |
| AONB weighting factor | 0.6666 | 0.73 | 0.93 | 0.6666 | 0.70 | 0.73 |
| AONB modified measure of developable and accessible land (hectares) | 2,275 | 575 | 697 | 4,987 | 6,058 | 11,919 |
| Distribution of Opportunities and Constraints | 9% | 2% | 3% | 19% | 22% | 45% |
| Stage 3 - Sustainable Distribution | | | | | | |
| Average of needs & preferences and opportunities & constraints | 24% | 2% | 3% | 18% | 15% | 38% |

5 Statistical assessments

The sections that follow set out the detailed assessments that have been undertaken for each stage of the methodology.

Stage 1 - Gypsy and Traveller needs and preferences

Gypsy and Travellers' Ideal Locations

On the face of it, Table 5.2 of the GTAA is presented as the district distribution of preferred locations for permanent sites expressed by the Gypsies and Travellers, and is reproduced below.

| | Per cent |
|-----------------|----------|
| Brighton & Hove | 20.8% |
| Eastbourne | 5.7% |
| Hastings | 8.5% |
| Lewes | 6.5% |
| Rother | 16.0% |
| Wealden | 42.5% |
| Total | 100% |

However, reference to the question [29] clearly reveals no distinction between permanent sites and transit sites was sought. Furthermore, paragraph 5.3.12 makes it clear that this distribution is based on all respondents "*regardless of their current accommodation arrangements*" and states the table has not been weighted to take account of their relative accommodation needs. It is no more than a composite of results from Tables 3.59 and 4.52 expressing the views of ideal site locations in the study area (by District) of those on authorised and unauthorised sites and those in permanent housing. It is also noted that this table reflects the views of all expressing a view and is not necessarily reflect the views of gypsies in permanent accommodation who stated an intention to move.

However, the GTAA does not provide any sound basis for proposing a variation. Therefore, while having some reservations, as an input to the broader sustainability assessment, Table 5.2 is used to reflect "ideal site" preferences.

Distribution of Authorised Pitches

It is recognised that demand is generated in part from existing families and therefore consideration is given to the current distribution of authorised pitches. The current distribution of total authorised pitches across the Study Area is shown below in summary and more fully in Appendix 2.

| Authorised pitches* | July 2006 | Per cent |
|---------------------|-----------|----------|
| Brighton & Hove | 23 | 33.3% |
| Eastbourne | 0 | 0% |
| Hastings | 0 | 0% |
| Lewes | 10 | 14.5% |
| Rother | 7 | 10.1% |
| Wealden | 29 | 42.0% |
| Total | 69 | 99.9% |

* The number of pitches is taken from the DCLG Caravan Count records Table 1 for private sites and Table 2 for public sites

Distribution of Unauthorised Pitches

Unauthorised encampments can be viewed as a demonstrable expression of demand and is therefore considered alongside the availability of authorised pitches.

.As is shown below, the proportion of caravans on unauthorised sites is much higher in Brighton and Hove, suggesting a strong level of attraction to a constrained area that offers nevertheless fewer potential site options than the county. This supports the opinions reported in the DCA study.

The level of unauthorised sites is also high in Lewes, suggesting an unsatisfied level of attraction, despite it being a less attractive location reported in the DCA study. (This is true of Hastings, but there is only one caravan)

| Unauthorised pitches (caravans) by Area | July 2006 | Per cent | % of all pitches in LA area |
|--|------------------|-----------------|------------------------------------|
| Brighton & Hove | 47 | 61% | 77% |
| Eastbourne | 0 | 0% | n/a |
| Hastings | 1 | 1% | 100% |
| Lewes | 22 | 29% | 76% |
| Rother | 0 | 0% | 0% |
| Wealden | 7 | 9% | 18% |
| Total | 77 | 100% | 55% |

It is considered that all of the above demand factors (ideal site preferences; authorised pitches at July 2006; and unauthorised caravans at the July 2006 count) are relevant to estimating the needs and realistic aspirations of Gypsies and Travellers. In the absence of any accepted basis for weighting them, a simple average is taken. This results in the following distribution as the outcome of Stage 1.

| | Brighton & Hove | Eastb'ne | Hastings | Lewes | Rother | Wealden |
|--|----------------------------|-----------------|-----------------|--------------|---------------|----------------|
| Stage 1 - Needs and preferences | | | | | | |
| 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% |
| Average of the above | 38% | 2% | 3% | 17% | 9% | 31% |

Stage 2 - Opportunities and Constraints

In considering where to start with the distribution of opportunities and constraints, regard was had to the issue of equity and choice. It is believed that the ability to accommodate pitches is most realistically and fairly related to physical area, than to population, for example. Also by using land area as a starting point we can use measures of other opportunities and constraints that reflect the relative potential of each area.

Land Capacity and Absolute Constraints

The second stage starts with a consideration of the total undeveloped land (in hectares) in each authority's area, reflecting their crude relative capacity to accommodate greenfield development. This was refined by looking at only at the amount of undeveloped land in each local authority area. This recognises that sites within existing urban areas are normally brownfield and assumes sites suitable for Gypsies and Travellers are not likely to be found there.

This recognises the built-up nature of the coastal, urban authorities. Hence, a geographically equitable distribution component would be:

| | Area (hectares) | Per cent undeveloped |
|-----------------|----------------------------|---------------------------------|
| Brighton & Hove | 8,473 | 56.8% |
| Eastbourne | 4,596 | 59.8% |
| Hastings | 2,972 | 46.1% |
| Lewes | 29,200 | 89.7% |
| Rother | 51,815 | 89.8% |
| Wealden | 83,659 | 91.5% |
| Total | 180,715 | |

Of course, this does not reflect accessibility or environmental factors which are discussed in subsequent sections.

In each area, the amount of undeveloped land is then reduced by subtracting the area covered by what are regarded as the absolute environmental constraints of flood risk areas and Sites of Special Scientific Interest (SSSIs). (The incidence of AONB is regarded as a relative constraint and is applied later in the assessment process.)

Circular 1/2006 (paragraph 64e) recognises the vulnerability of caravans in flood risk areas and advises that locating such sites in flood plains is inappropriate. SSSIs are similarly regarded as sites where development should not take place if other opportunities exist. In this respect caravan sites are treated the same as for any other development for this environmental constraint (Circular 1/2006 Annex C paragraph 5). This information has been supplied by the Sussex Biodiversity Record Centre.

| | Brighton & Hove | Eastb'ne | Hastings | Lewes | Rother | Wealden |
|--|--------------------------------|-----------------|-----------------|---------------|---------------|----------------|
| Undeveloped area | | | | | | |
| Less absolute constraints: | 4,853 | 2,723 | 1,420 | 26,403 | 46,516 | 76,501 |
| a) Flood risk areas | 164 | 1,301 | 239 | 3,159 | 9,848 | 7,797 |
| b) SSSIs | 139 | 371 | 300 | 1,868 | 4,616 | 8,233 |
| Feasibly developable land area (undeveloped land less absolute constraints) | 4,550 | 1,051 | 881 | 21,376 | 32,052 | 60,471 |

Accessible Land - Social Inclusion

The criteria relating to social inclusion issues focus on the key sustainability issues identified in the DCLG guidance documents, namely access to employment, education and health facilities.

The criteria utilise the maps prepared for the County Council by consultants as part of the Accessibility Planning project which form part of the work underpinning the Local Transport Plan (LTP2).

The respective accessibility criteria and isochrones used are:

- | | | |
|-----|---|------------|
| (a) | access to school (primary/secondary) by bus and walking – | 20 minutes |
| (b) | access to further education by bus and walking – | 30 minutes |
| (c) | access to GP surgeries by bus and walking – | 20 minutes |
| (d) | access to main employment centres by car – | 20 minutes |

The percentage of each local authority area within the respective isochrone has been manually calculated from the accessibility maps.

As regards access to employment centres (d), it is found that there is generally good access to towns providing a range of employment opportunities in that all parts of each Authority meet the criterion. Hence, it is not applied in the assessment.

In terms of access to education, primary education is regarded a critical in terms of encouraging school attendance, while access to further education is important in terms of increasing vocational educational attainment.

Schools are well distributed throughout the Area, reflecting the settlement pattern. However, there is an inevitably lower level of accessibility in some rural areas. This effect is greater for further education.

For schools in the rural Authorities, Lewes has 40% accessibility, Rother and Wealden have 35%. The comparable figures for further education are 25% for Lewes, and 15% for Rother and Wealden.

The urban Authorities in East Sussex have similar accessibility for both, at Hastings 85% and Eastbourne 75%.

GPs are more concentrated in to the towns and service centre villages. Hence, access is notably lower in the more rural areas. Lewes is somewhat better served (40%) compared to Rother and Wealden, while the urban areas have similar proportions within the threshold as for education.

As the accessibility work was undertaken for East Sussex it does cover Brighton & Hove, but for all criteria it is assumed that Brighton & Hove has a similar scale of accessibility to each facility as Eastbourne and this is reflected in the results.

The accessibility factors for each facility were then averaged to give a combined accessibility rating. The resulting percentage was then applied to the feasibly developable areas resulting from the previous step.

The outcomes of the accessibility assessment are set out below:

| | Brighton & Hove | Eastb'ne | Hastings | Lewes | Rother | Wealden |
|--|-----------------|------------|------------|--------------|--------------|---------------|
| Accessible land | | | | | | |
| Percentage of area accessible to: | | | | | | |
| a) Primary & Secondary School | 75% | 75% | 85% | 40% | 35% | 35% |
| b) Further Education | 75% | 75% | 85% | 25% | 15% | 15% |
| c) General Practitioners | 75% | 75% | 85% | 40% | 30% | 30% |
| Average accessibility as % of area | 75% | 75% | 85% | 35% | 27% | 27% |
| Feasibly developable and accessible land (hectares) | 3,412 | 788 | 749 | 7,481 | 8,654 | 16,327 |

Relative Constraints - AONBs

There are two AONBs in the Study Area, the Sussex Downs and the High Weald and they cover extensive areas in the study area. Government policy and advice in Circular 1/2006 recognises that AONB designation does represent a constraint, but also that this should not be viewed as an absolute constraint. Development is not automatically ruled out in AONBs, but care has to be taken in planning decisions to avoid development that compromises their natural beauty objectives. This principle applies equally to Gypsy and Traveller sites as it does to any other kind of development.

In taking account of the AONBs, therefore, a factor is derived to reflect the extent of AONB coverage in each area, but weighted to acknowledge that the open Sussex Downs landscape is potentially more vulnerable to impact from development than the High Weald. The factor is derived from the percentage of each area that is covered by each AONB. At the top of each range shown in the table below, the AONB percentages are broadly reduced by one third for the Sussex Downs and by two-thirds for the High Weald, reflecting their differing vulnerability. For Wealden, the results from the two AONBs were combined into a single factor.

The derivation of these weightings is shown below. Whichever band the percentage of an area's AONB coverage falls into, the percentage is reduced as follows:

| | |
|---|--|
| <p>Depending on the proportion of each area covered by the <u>Sussex Downs AONB</u>, the estimate of feasibly developable and accessible land is reduced by one of the following factors:</p> <p>0 – 10% reduce by 7% 11 – 20% reduce by 13% 21 – 30% reduce by 20% 31 – 40% reduce by 27% 41 – 50% reduce by 33%</p> | <p>Depending on the proportion of each area covered by the <u>High Weald AONB</u>, the estimate of feasibly developable and accessible land is reduced by one of the following factors:</p> <p>0 – 10% reduce by 3% 11 – 20% reduce by 7% 21 – 30% reduce by 10% 31 – 40% reduce by 13% 41 – 50% reduce by 17% 51 – 60% reduce by 20% 61 – 70% reduce by 23% 71 – 80% reduce by 27% 81 – 90% reduce by 30%</p> |
|---|--|

These modified percentages were then converted into AONB weighting factors which were then applied to the results from earlier steps (combining the relative measures of undeveloped land, unconstrained land and accessible areas).

The resultant land areas (in hectares) are then converted into a percentage distribution across the study area as a modified measure of relative potential development opportunity. The net effect of these processes shows the relative potential of each local authority area across the study area.

| Relative constraints | Brighton & Hove | Eastb'ne | Hastings | Lewes | Rother | Wealden |
|---|----------------------------|-----------------|-----------------|---------------|---------------|----------------|
| Feasibly developable and accessible land area | 3,412 | 788 | 749 | 7,481 | 8,654 | 16,327 |
| Percentage of each area covered by: | | | | | | |
| a) Sussex Downs | 41.4% | 39.7% | 0% | 46.8% | 0% | 7.2% |
| b) High Weald | 0% | 0% | 17.6% | 0% | 82.6% | 53.4% |
| Weighted AONB reduction: | | | | | | |
| a) Sussex Downs | -33% | -27% | 0 | -33% | 0 | -7% |
| b) High Weald | 0 | 0 | -7% | 0 | -30% | -20% |
| AONB weighting factor | 0.6666 | 0.73 | 0.93 | 0.6666 | 0.70 | 0.73 |
| AONB modified measure of developable and accessible land (hectares) | 2,275 | 575 | 697 | 4,987 | 6,058 | 11,919 |
| Relative distribution | 9% | 2% | 3% | 19% | 22% | 45% |

Stage 3 - The Sustainable Distribution

The final stage is combining the results of stages 1 and 2. This is done by taking a simple average of the percentage distributions of needs and preferences and the opportunities and constraints.

| | Brighton & Hove | Eastb'ne | Hastings | Lewes | Rother | Wealden |
|--|-----------------|-----------|-----------|------------|------------|------------|
| Outcome of Stage 1: Needs and preferences | 38% | 2% | 3% | 17% | 9% | 31% |
| Outcome of Stage 2: Opportunities and constraints | 9% | 2% | 3% | 19% | 22% | 45 |
| Outcome of Stage 3: Sustainable distribution (Average of stages 1 & 2) | 24% | 2% | 3% | 18% | 15% | 38% |

Hence, the final sustainable distribution from stage 3 therefore is:

| | |
|----------------------------|-------------|
| Brighton & Hove | 24% |
| Eastbourne | 2% |
| Hastings | 3% |
| Lewes | 18% |
| Rother | 15% |
| Wealden | 38% |
| East Sussex | 76% |
| GTAA area | 100% |

It is appreciated that there are limitations to the method used in deriving this distribution.

- a) Each constraint factor measured in isolation and the method is not responsive to the fact that some land is covered by more than one constraint.
- b) Accessibility factors are estimates taken from accessibility maps rather than accurate measurements and those for Brighton & Hove are estimated (to be the same as for Eastbourne) as the original work did not extend into the city.
- c) So far, no consideration is given to equity and choice issues relating to the type of site provision in terms of tenure and size.
- d) It is not very sensitive to the relationship between the provision of permanent pitches and transit pitches

As regards (a) and (b) above, it may be possible to seek a more accurate measurement of these factors. Specifically in relation to the overlap of designations, this perhaps has the greatest effect in Eastbourne which would tend to reduce figures due to the extent of the town that is within flood risk areas. However, to some degree these limitations impacts on all areas. Site size and tenure (c) are discussed separately below and are considered issues that more appropriately affect delivery rather than distribution of sites. It is emphasised that this is a methodology that the Officers Advisory Group has had to develop in the absence of any detailed guidance by SEERA. However, while it does have limitations, we are confident that the full range of factors highlighted in guidance has been given full consideration. It has also been developed specifically to take account of prevailing local issues and circumstances.

Furthermore, as recognised in the DCLG Paper, this is not a precise technical exercise. Rather, the test should be whether the results are meaningful. In this context we are confident that the results produce a fair and rounded overall distribution of permanent residential caravan pitches.

6 Site size and type

Site size and tenure are important aspects of equity and choice. Guidance argues against large monolithic sites and the requirements of the Gypsy and Traveller community should be respected. It did not prove possible to readily build these criteria into the statistical assessment and, as mentioned above, they may in any case be better handled as an aspect of delivery. Therefore it is regarded as information that should inform the nature of sites that potentially can be applied to the distribution of sites.

The analysis of these factors is set out below and the information is taken primarily from the GTAA.

Site size

Generally, there is a strong preference for permanent sites to be small [Tables 3.57 and 4.50].

Of those currently living on sites:

- 26% preferred sites of 1-5 pitches;
- 58% preferred sites in the 6-10 pitch range; and
- 10% preferred sites in the 11-15 pitch range.

Of those currently living in permanent housing:

- 36% preferred sites of 1-5 pitches;
- 55% preferred sites in the 6-10 pitch range; and
- 2% preferred sites in the 11-15 pitch range.

Site type

An overwhelming preference for permanent sites, rather than transit, was expressed by both those living on sites (40% of whom were on unauthorised sites) and those living in permanent housing [Tables 3.58 and 4.51].

Site tenure

A second question on ideal site type [Q32] considered site tenure and the overwhelming majority favoured either a local authority owned site or a site with planning permission owned by the Gypsies themselves.

Of 64 responses from Gypsies and Travellers living on sites:

- 32 households (50%) favoured a site with planning permission that was owned either by them or their family; and
- 30 (47%) a site owned by the Council.
- None favoured sites owned by private landlords or RSL/HAs.

Of the 52 respondents living in permanent housing who expressed views on their ideal site tenure:

- 27 (52%) favoured a site with planning permission that was owned either by them or their family;
- 18 (35%) a site owned by the Council; and

- only 1 (2%) a site owned by RSL or HA.
- Again no-one favoured a site owned by a private landlord.

It is notable that the current (July 2006) split between caravans on public and private authorised sites varies considerably by district:

| | Public | Private |
|-----------------|---------------|----------------|
| Brighton & Hove | 14 | 0 |
| Eastbourne | 0 | 0 |
| Hastings | 0 | 0 |
| Lewes | 7 | 0 |
| Rother | 8 | 0 |
| Wealden | 23 | 10 |
| Total | 52 | 10 |

Only Wealden has granted planning permission for privately-owned sites, while Eastbourne and Hastings have neither public nor private sites.

APPENDIX 1

Initial responses to questions in the DCLG guidance which have helped inform the assessment of Option B

| | |
|--|--|
| Q1: What is the scale of the issue to be addressed? | |
| Background | |
| | The GTAA indicates a pitch requirement of 80, but this includes a mix of permanent and transit pitches which the GTAA does not itself separate out. The scale of permanent provision likely to be required over the period 2006-2011 is 47 pitches resulting from the Option A work based on advice in the CLG research paper. The Option A work assessed the scale of need for the period 2011-2016 at zero as vacancies in the stock are likely to offset increases in need. |
| Sub-questions | |
| | Question 1.1: How much land in total might this involve? |
| | To be advised. |
| | Q1.2: How many sites might be involved? |
| | The GTAA highlights that small sites (normally less than 10 pitches) are generally preferred. On this basis the total number of sites across the study area is likely to be around 6. |
| | Q1.3: How does this compare with RSS residential allocations? |
| | The distribution of pitches considered the distribution of RSS residential allocations (which total 1,900 for the whole study area), but concluded that it was a less relevant factor than relative land areas, as much of the housing provision in this area would be on brownfield land within urban areas and often in high density locations. |
| Q2: What is the geographical starting point? | |
| Background | |
| | The study area covers Brighton & Hove together with districts within the county area of East Sussex, (Eastbourne, Hastings, Lewes, Rother and Wealden). |
| Sub-questions | |
| | Q2.1: Does existing provision appear to form natural sub-regional groupings? |
| | Existing provision tends to relate to main transport corridors of the A28, A21, A22 and A23. The GTAA indicates patterns of movement across the study area with notably further movements across into West Sussex particularly from the Brighton area. |
| | Q2.2: Are there areas where clusters of provision in one LPA adjoin an area with no or little provision? |
| | See report. |

| | |
|---|--|
| Q3: What scope is there for 'dispersing' pitch requirement allocations beyond areas with concentrations of existing provision? | |
| Background | |
| | To be added. |
| Sub-questions | |
| | Q3.1: Is there any indication of the extent of need/requirement which could be 'dispersed'? |
| | Much of the study area is constrained by national AONB landscape designations, together with areas of national ecological importance and significant flood risk areas. Urban areas are concentrated in the coastal strip, but are regarded as having only limited opportunities for new site development. |
| | Q3.2: Are there guidelines to determine the area over which requirement might be dispersed? |
| | This has been determined through the development of an assessment framework based on sustainability and planning principles – see report. |
| | Q3.3: Can alternative scenarios be devised for appraisal and consultation? |
| | Two spatial options have been devised in accordance with the SEERA Brief. |
| Q4: What are the positive factors for pitch allocations? | |
| Background | |
| | This substantially derives from the GTAA and the needs and aspirations of the travelling community that it identifies. Other factors include encouraging accessibility to education and health facilities as well as employment opportunities. |
| Sub-questions | |
| | Q4.1: Where do Gypsies and Travellers want to live? |
| | The GTAA identifies a preference for countryside locations followed by villages across the study area. This is elaborated upon in the report. |
| | Q4.2: Where are the main employment centres? |
| | Within the study area the main employment centres are Brighton & Hove, Eastbourne, Hastings and Bexhill. These are supplemented by the smaller towns of Newhaven, Lewes, Hailsham, Uckfield, Crowborough, Battle and Rye. The adjacent urban centres of Crawley, Gatwick and Tunbridge Wells also provide significant employment destinations. |
| | Q4.3: Where are the main housing growth areas? |
| | The main areas for housing growth are the existing main urban areas, whilst new greenfield development is focussed primarily in the Eastbourne-Hailsham and Bexhill areas. |
| | Q4.4: Where can social inclusion best be fostered? |
| | In line with CLG research and Circular 1/06, social inclusion is fostered through the consideration of accessibility to jobs and local health and education services. It will be further considered in the identification of sites. |
| | Q4.5: Where are the main transport routes? |
| | See Q2.1 |

| | |
|---|--|
| Q5: What are the main constraints on site development? | |
| Background | |
| | See Q3 |
| Sub-questions | |
| | Q5.1 Are there areas where Gypsies and Travellers do not want to live? |
| | To be added. |
| | Q5.2: Where are the main existing built-up areas? |
| | See Q4.2 |
| | Q5.3: Where are the main environmental protection areas? |
| | AONB designations cover most of Rother and the majority of Wealden. The coastal part of Lewes is within the Sussex Downs AONB as are the fringes of Brighton & Hove and Eastbourne. |
| | Q5.4: Is Green Belt a relevant consideration? |
| | No, there is no green belt in the study area. |
| | Q5.5: Is flood risk a relevant consideration? |
| | Yes, in certain areas but this has been factored into the assessment of opportunities and constraints. |
| Q6: What is the need for social and affordable site provision? | |
| Background | |
| | This is addressed in the GTAA and broadly the gypsies' preferences are equally for private sites owned by gypsies themselves or sites owned by the local council. However, it is noted that the CLG research questions the application of "affordability" in relation to Gypsy site provision. |
| Sub-questions | |
| | Q6.1: What are the tenure preferences? |
| | The GTAA indicates the approximately even split between gypsies owning their own sites and local authority owned sites. Very little interest (and none for gypsies living on sites - as opposed to housing) was expressed in sites owned by other private landlords or RSLs. |
| | Q6.2: What is the requirement for local authority/RSL pitch provision? |
| | To be determined. |
| | Q6.3: What is the requirement for private (affordable) pitch provision? |
| | To be determined. |

APPENDIX 2 – Caravan counts

| | | Authorised | | | Unauthorised sites | | | | Total unauthorised | Total on all sites | Percent on unauthorised sites |
|-----------------|--------|---------------|---------|------------------|------------------------|---------------|----------------------------|---------------|--------------------|--------------------|-------------------------------|
| | | social rented | private | Total authorised | Sites owned by gypsies | | Sites not owned by gypsies | | | | |
| | | | | | tolerated | not tolerated | tolerated | not tolerated | | | |
| Brighton & Hove | Jul-06 | 14 | 0 | 14 | 0 | 0 | 0 | 47 | 47 | 61 | 77.0 |
| | Jan-06 | 4 | 0 | 4 | 0 | 0 | 0 | 0 | 0 | 4 | 0.0 |
| | Jul-05 | 38 | 0 | 38 | 0 | 0 | 0 | 48 | 48 | 86 | 55.8 |
| | Jan-05 | 15 | 0 | 15 | 0 | 0 | 0 | 0 | 0 | 15 | 0.0 |
| | Jul-04 | 24 | 0 | 24 | 0 | 0 | 10 | 20 | 30 | 54 | 55.6 |
| E Sussex | Jul-06 | 38 | 10 | 48 | 0 | 12 | 6 | 12 | 30 | 78 | 38.5 |
| | Jan-06 | 30 | 14 | 44 | 0 | 12 | 16 | 14 | 42 | 86 | 48.8 |
| | Jul-05 | 35 | 6 | 41 | 0 | 10 | 0 | 22 | 32 | 73 | 43.8 |
| | Jan-05 | 40 | 6 | 46 | 1 | 8 | 0 | 4 | 13 | 59 | 22.0 |
| | Jul-04 | 30 | 9 | 39 | 25 | 7 | 0 | 69 | 101 | 140 | 72.1 |
| Eastbourne | Jul-06 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | Jan-06 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | Jul-05 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | Jan-05 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | Jul-04 | 0 | 0 | 0 | 0 | 0 | 0 | 2 | 2 | 2 | 100.0 |
| Hastings | Jul-06 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 1 | 1 | 100.0 |
| | Jan-06 | 0 | 0 | 0 | 0 | 0 | 0 | 3 | 3 | 3 | 100.0 |
| | Jul-05 | 0 | 0 | 0 | 0 | 0 | 0 | 4 | 4 | 4 | 100.0 |
| | Jan-05 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | Jul-04 | 0 | 0 | 0 | 0 | 0 | 0 | 3 | 3 | 3 | 100.0 |
| Lewes | Jul-06 | 7 | 0 | 7 | 0 | 7 | 5 | 10 | 22 | 29 | 75.9 |
| | Jan-06 | 0 | 3 | 3 | 0 | 7 | 16 | 0 | 23 | 26 | 88.5 |
| | Jul-05 | 3 | 3 | 6 | 0 | 3 | 0 | 11 | 14 | 20 | 70.0 |
| | Jan-05 | 12 | 3 | 15 | 0 | 2 | 0 | 0 | 2 | 17 | 11.8 |
| | Jul-04 | 5 | 3 | 8 | 0 | 2 | 0 | 0 | 2 | 10 | 20.0 |

| | | | | | | | | | | | |
|---------|--------|----|----|-----------|----|---|---|----|-----------|------------|------|
| Rother | Jul-06 | 8 | 0 | 8 | 0 | 0 | 0 | 0 | 0 | 8 | 0.0 |
| | Jan-06 | 7 | 0 | 7 | 0 | 0 | 0 | 0 | 0 | 7 | 0.0 |
| | Jul-05 | 9 | 0 | 9 | 0 | 0 | 0 | 0 | 0 | 9 | 0.0 |
| | Jan-05 | 10 | 0 | 10 | 0 | 0 | 0 | 0 | 0 | 10 | 0.0 |
| | Jul-04 | 7 | 0 | 7 | 0 | 0 | 0 | 0 | 0 | 7 | 0.0 |
| Wealden | Jul-06 | 23 | 10 | 33 | 0 | 5 | 0 | 2 | 7 | 40 | 17.5 |
| | Jan-06 | 23 | 11 | 34 | 0 | 5 | 0 | 11 | 16 | 50 | 32.0 |
| | Jul-05 | 23 | 3 | 26 | 0 | 7 | 0 | 7 | 14 | 40 | 35.0 |
| | Jan-05 | 18 | 3 | 21 | 1 | 6 | 0 | 4 | 11 | 32 | 34.4 |
| | Jul-04 | 18 | 6 | 24 | 25 | 5 | 0 | 64 | 94 | 118 | 79.7 |

Sites provided by local authorities (July 2006)

| | | Total pitches | Residential pitches | Transit pitches | Caravan capacity |
|------------------|---------------|---------------|---------------------|-----------------|------------------|
| Btn & Hove | Horsdean | 23 | 0 | 23 | 46 |
| Lewes | Southerham | 10 | 0 | 10 | 10 |
| Rother | Robertsbridge | 7 | 7 | 0 | 7 |
| Wealden | Polegate | 6 | 6 | 0 | 12 |
| | Hailsham | 5 | 5 | 0 | 5 |
| | Maresfield | 8 | 8 | 0 | 16 |
| East Sussex | | 36 | 26 | 10 | 50 |
| GTAA area | | 59 | 26 | 33 | 96 |