



Rother District Council

Local Development Framework

Gypsy, Traveller and Travelling Showpeople



Background Paper

August 2011

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Issues &
Options



Strategy
Directions



Pre - Submission



Examination



Adoption



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Provision of Permanent Sites for Gypsies, Travellers and Travelling Showpeople.

Review of the Evidence Base

1.0 Purpose of the Report

- 1.1 The objective of this report is to provide an evidence base and outline a robust methodology for the provision of sites for Gypsies and Travellers in Rother District. This document forms the evidence base in preparation of both the Core Strategy and the Site Allocations and Development DPD (Development Plan Document), as part of the Rother District Council Local Development Framework (LDF). The report outlines the appropriate level of provision for Gypsy and Traveller pitches within the District for permanent sites, using existing evidence to determine the appropriate level of need within the District.
- 1.2 This background paper examines the evidence in order to determine the appropriate number of Gypsy and Traveller pitches required within the District based on local need. The methodology used in this report has been devised in-conjunction with the other local authorities in East Sussex and Brighton and Hove, in order to devise a robust and consistent approach across the county to assessing need for Gypsy and Traveller pitches. It should also be noted that this approach is consistent with the geographic coverage within the Gypsy and Traveller Accommodation Assessment (GTAA).
- 1.3 The report will also need to assess local demand for temporary stopping places for use by Gypsies and Travellers while travelling (such as transit site pitches), and identify suitable locations for them.
- 1.4 The local need for pitches for Travelling Showpeople are also considered within this background paper.

2.0 Introduction

- 2.1 The Council as part of its Local Development Framework is preparing an evidence base relating to the needs and demand for sites for Gypsies and Travellers within the District. The Housing Act 2004 places a duty on Councils to assess the accommodation needs for Gypsies and Travellers and make adequate provision for them within their Local Authority area.
- 2.2 For the purposes of this study, the definition of Gypsies and Travellers outlined in The Planning Circular 01/2006 is used, which identifies Gypsy and Travellers as:

“... persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or

their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling show people or circus people travelling together as such."

- 2.3 The Planning Circular 01/2006, *Planning for Gypsies and Traveller Caravan Sites*, aims to significantly increase the number of authorised Gypsy and Traveller sites in appropriate locations (i.e. those with planning permission), whilst the Housing Act 2004 requires local authorities to undertake accommodation needs assessment for Gypsies and Travellers who reside in or resort to their areas, and then to set out a strategy to meet those needs. Providing adequate provision for Gypsies and Travellers will help to reduce the amount of unauthorised camping within the area in the first place.
- 2.4 In terms of Travelling Showpeople, the definition outlined in Planning Circular 04/2007 is:
- '...Showpeople are members of a community that consists of self-employed business people who travel the country, often with their families, holding fairs...Although their work is of a mobile nature, showpeople nevertheless require secure, permanent bases for the storage of their equipment and more particularly for residential purposes¹.'*
- 2.5 Guidance relating to planning for Travelling Showpeople is covered by Planning Circular 04/2007 and considered in more detail below.
- 2.6 Local planning authorities are obliged to identify sites in their Development Plan Documents, in line with the requirement in the Regional Spatial Strategy (RSS). It is no longer acceptable just to define specific criteria for sites: local authorities are expected to identify land.
- 2.7 However, it should be noted that in July 2010 the Secretary of State announced the intention to abolish Regional Spatial Strategies. However, the duty to provide sites for Gypsies and Travellers is still a requirement through the Housing Act 2004.
- 2.8 Local authorities also have a duty to promote good race relations, equality of opportunity and community cohesion in all of their policies and practices through the Race Relations (Amendment) Act 2000 and the Equalities Act 2010, which brings together much of the differing strands of Equality legislation. This duty covers all racial groups, including Gypsies and Irish Travellers who are recognised ethnic groups. Equality of opportunity is central to the Council's objectives and values as stated in the Rother Corporate Plan. The aim of the

¹ Circular 04/2007 – Planning for travelling showpeople.

Rother District Single Equalities Scheme is to ensure all our services and employment opportunities are provided with equality and fairness to everyone.

3.0 Types of Gypsy and Traveller site

3.1 There are 3 kinds of sites operationally:

Permanent residential – permanently sited caravans used for people who travel little, or who want a base from which to travel.

Transit – short term pitches that can accommodate families for up to 90 days, for those with a more nomadic lifestyle who are travelling through the area.

Emergency stopping places – authorised sites where travellers on unauthorised encampments can be relocated for a short time as an emergency arrangement when S62A-E² are invoked. These are usually provided in the absence of transit provision.

4.0 Current Gypsy and Traveller Sites in Rother

4.1 As at 31st March 2011, there were 9 authorised pitches with planning permission for Gypsies and Travellers within Rother; 8 are located at Redlands, Fair Lane, Robertsbridge. This East Sussex County Council owned site is situated off the A21 Battle Road and has existed for 20 years. The site itself consists of 8 permanent socially rented pitches each with its own amenity building consisting of bath, shower, toilet and washing facilities.

4.2 Since 2006, 1 pitch has been granted permanent planning permission³ at Buckholt Lane, Bexhill.

4.3 In addition, 3 pitches have been granted temporary personal planning permissions at:

- Cherry Tree Farm, Flimwell,
- Bramble Farm, Ewhurst, and
- Telham Lane, Battle.

4.4 Currently, there are no unauthorised sites within the District.

² Section 62A of the 1994 Act also provides the police with powers to remove Gypsies and Travellers from land. However, in this case the police must have a suitable pitch to direct Travellers to i.e. an authorised stopping place – normally a local authority site or a piece of land where encampments are ‘tolerated’, which should have facilities such as water, sanitation and refuse collection, in order to be ‘suitable’..

³ Permanent planning permission was granted at Hayden Lodge, Silverhill for 1 pitch for a gypsy household. However, currently this is not occupied by a Gypsy household and is subject to enforcement action.

Table 1: Pitches in Rother in 2011

Site	No of pitches	Type of consent	Date permitted
Redlands, Fair Lane, Robertsbridge	8	Permanent	1998 (1 additional pitch was added in 2011)
Buckholt Lane, Bexhill	1	Permanent	2009
Bramble Farm, Ewhurst	1	Temporary (up to 20.04.12)	2006
Cherry Tree Farm, Flimwell	1	Temporary (up to 20.4.12)	2009
Telham Lane, Battle	1	Temporary (up to 19.08.12)	2010

5.0 Government Policy Position

- 5.1 This report will look at the current Government Policy position and the evidence base which details the needs and demand for permanent Gypsy and Traveller accommodation within the District.

National Policy and Guidance

Planning Policy Statement 3: Housing

- 5.2 Planning Policy Statement 3: Housing (PPS3) considers the Governments key housing policy goals and objectives, including that everyone has the opportunity to live in a decent home, they can afford in a community where they want to live. A key element of this is to consider how to achieve the right mix of housing to accommodate a mix of different households.
- 5.3 PPS3 considers the need for Local Authorities to plan for a mix of households on the basis of the different types of households that are likely to require housing. In this regard, Local Authorities should consider the diverse requirements across the area, including the needs to accommodate Gypsies and Travellers.

Planning Circular 01/2006

- 5.4 Planning Circular 01/2006 reinforces the Government aim that members of the Gypsy and Travellers communities should have the same rights and responsibilities as every other citizen. The Circular details the most recent Central Government advice on the planning aspects of finding sites for Gypsies and Travellers and how local authorities and Gypsies and Travellers can work together to achieve this aim. One of the key intentions of Circular 01/2006 is to create and support sustainable, respectful, and inclusive communities where

Gypsies and Travellers have fair access to suitable accommodation, education, health, and welfare provision.

5.5 The Circular states that:

“the number of pitches set out in the RSS must be translated into specific site allocations in one of the local planning authority’s DPDs that form part of the LDF.”

5.6 The Circular also indicates that:

“the Core Strategy should set out the criteria of Gypsy and Traveller sites which will be used to guide the allocation of sites in the relevant DPD. These criteria will also be used to meet unexpected demand’ (DCLG, 2006). It also states that ‘Local Authorities must allocate sufficient sites for Gypsies and Travellers.”

5.7 The Circular also details good practice for developing criteria-based policies and for assessing potential Gypsy and Traveller sites, such as vehicular access from the public highway and provision for parking, turning and servicing on site. The criteria for assessing sites will be subject to further consideration at the site selection stage.

Planning Circular 04/2007

5.8 Circular 04/2007 sets out the context in relation to planning specifically for Travelling Showpeople.

“Showpeople are members of a community that consists of self-employed business people who travel the country, often with their families, holding fairs.... Although their work is of a mobile nature, showpeople nevertheless require secure, permanent bases for the storage of their equipment and more particularly for residential purposes⁴. Travelling showpeople often require larger areas than other Gypsies and Travellers due to their equipment storage requirements, or space to exercise animals, such as horses. Most showpeople are likely to be members of Showmen’s Guild.”

5.9 The Circular states that Travelling Showpeople’s needs should be included and assessed within the Gypsy and Traveller Accommodation Assessment (GTAA). Given the need identified within the GTAA, the local authority should seek to translate need into site specific allocations within their LDF.

⁴ Circular 04/2007 – Planning for travelling showpeople.

Letter to Chief Planning Officers from DCLG (July 2010)

- 5.10 On 6th July 2010, Steve Quartermain, Chief Planner at the Department of Communities and Local Government distributed advice relating to the immediate issues arising from the notice relating to the intention to revoke the Regional Strategies. The paper provides advice relating to delivering Local Development Frameworks and in making decisions on planning applications. In particular reference to determining the level of provision for Travellers' sites the following advice was provided:

“Local councils are best placed to assess the needs of travellers. The abolition of Regional Strategies means that local authorities will be responsible for determining the right level of site provision, reflecting local need and historic demand, and for bringing forward land in DPDs. They should continue to do this in line with current policy. Gypsy and Traveller Accommodation Assessments (GTAAAs) have been undertaken by all local authorities and if local authorities decide to review the levels of provision these assessments will form a good starting point. However, local authorities are not bound by them. We will review relevant regulations and guidance on this matter in due course.”

- 5.11 Therefore, it is considered that Local Authorities are best placed to determine the right level of Gypsy and Traveller provision in their area, which reflects local need and historic demand, and for bringing forward land in DPDs. This should be developed in line with current Government policy.

Regional Policy

The South East Plan (2009) and Partial Review (2010)

- 5.12 The South East Plan was published in May 2009 and included an interim statement on provision for Gypsies and Travellers and stating that the Regional Planning Body would take a single issue review of Gypsy and Traveller accommodation needs within the south east region.
- 5.13 A single issue review was initiated following the publication of government guidance requiring Regional Spatial Strategies to address the accommodation needs of Gypsies and Travellers and Travelling Showpeople.
- 5.14 However, in May 2010, the Secretary of State announced its intention to abolish Regional Spatial Strategies (RSSs) in the Localism Bill, meaning that they will no longer form part of the development plan for the purposes of s38(6) of the Planning and Compulsory Purchase Act 2004.

- 5.15 Advice from Communities and Local Government (CLG) informs Local Authorities that the Government's intention to abolish Regional Spatial Strategies is a material consideration when determining planning applications.
- 5.16 As a result of this decision it is envisaged that the final panel report in respect to Gypsies and Travellers on the Partial Review of the South East Plan is unlikely to be published.

Local Policy and Guidance

Rother District Local Plan (2006)

- 5.17 The current adopted development plan for Rother is the Rother District Local Plan (2006) and contains policy HG6 which relates to sites for Gypsies and Travellers.

Policy HG6: Sites for Gypsies and Travelling Showpeople

Proposals for new gypsy sites, extensions to existing gypsy sites and sites for travelling showpeople will be permitted provided the following criteria are met:

- (i) There is no adverse impact on the character of the countryside, particularly in the High Weald Area of Outstanding Natural Beauty;**
 - (ii) The local environment and residential amenities will not be adversely affected;**
 - (iii) There is a satisfactory means of vehicular access and the local road network is adequate;**
 - (iv) The site is conveniently located in relation to schools and other community facilities.**
- 5.18 At the time of adoption, it was clearly identified that there was little local demand for any additional Gypsy and Traveller pitches in the District. Therefore a criteria-based policy was written which is used to consider any future proposals, however no sites were allocated for Gypsy and Traveller use.

East Sussex Traveller Strategy – 2010-2013 – East Sussex County Council

- 5.19 This multi-agency Traveller Strategy for East Sussex provides the strategic framework to address the following three key objectives:
- 1. To work in partnership to strike a balance between the needs of the settled and Gypsy and Traveller communities.
 - 2. To address the accommodation needs of Gypsies and Travellers.

3. To provide support to Gypsies and Travellers.

5.20 The strategy sets out the strategic framework to support Gypsies and Travellers within East Sussex, through accommodation, tackling schooling issues (both attendance and attainment) and health provision amongst the Gypsies and Travellers.

Other Relevant Legislation

European Convention on Human Rights

5.21 In respect of the European Convention of Human Rights, the Circular states that:

“Local Planning Authorities should consider the consequences of refusing or granting planning permission, or taking enforcement action, on the rights of the individuals concerned, both Gypsies and Travellers and local residents, and whether the action is necessary and proportionate in the circumstances.”
(Paragraph 70)

5.22 Taking account of the needs of Gypsies and Travellers for accommodation, as required by Circular 01/06, will assist the Council to comply with this statement.

The Housing Act 2004

5.23 The Housing Act 2004 requires local housing authorities to include Gypsies and Travellers in their accommodation assessments and to take a strategic approach to demonstrating how these accommodation needs will be met as part of their wider housing strategies.

6.0 The Evidence Base

East Sussex and Brighton and Hove Gypsy and Traveller Accommodation Assessment (GTAA) – 2005

- 6.1 As discussed above, the Housing Act (2004) places the duty on local authorities to carry out an assessment of the accommodation needs of Gypsies and Travellers. In 2005, the Council undertook a joint Gypsy and Traveller Accommodation Assessment (GTAA) involving all local authorities in East Sussex and Brighton and Hove City Council. The purposes of the GTAA was to determine the unmet need of Gypsy and Traveller provision within the county to 2011.
- 6.2 The report presented the results of a needs accommodation model, which estimated that overall requirement for additional pitches over the five year period of the South East Plan (2006-2011). The Assessment drew on survey information from interviews with the local Gypsy and Traveller community, and through the twice yearly caravan counts from DCLG.
- 6.3 The Assessment by David Couttie Associates (DCA) concluded that there is an overall requirement to provide an additional 80 (unspecified) pitches for Gypsies and Travellers over the five year period from 2006-2011 within the whole GTAA area. In arriving at this conclusion, the model looked at the following key issues:
1. The current backlog of unmet needs for pitches;
 2. Newly-arising needs for further pitch provision over the next 5 years;
 3. The flow of existing pitches that are likely to become available (i.e vacant) to meet such needs; and
 4. Having taken account of likely vacancies, the residual number of additional pitches that will be required to meet the outstanding needs.
- 6.4 Based on the evidence collected through the GTAA relating to respondents preferences on location indicated an indicative distribution of 13 (unspecified) pitches in Rother from 2006-2011.

Towards a Baseline Distribution of Future Pitch Provision – July 2007

- 6.5 The County Council along with the District Councils within East Sussex produced a new advice paper 'Towards a Baseline Distribution of Future Pitch Provision'. The advice note drew on evidence from the GTAA but made a revised assessment that solely looked at the provision for permanent pitches within East Sussex. The advice note concluded that an additional 47 permanent pitches were needed for the 2006-2011 period, rather than the DCA assessment which

recommended 80 additional (unspecified) pitches, as the DCA assessment assumed that all Gypsies and Travellers on unauthorised encampments require some sort of provision (permanent or transit).

- 6.6 Although the DCA report did not make assumptions post 2011, using the same rates for household formation and transfer between sites and housing as used in the 2006-2011 period, the report concluded that post 2011 future site requirements from new households (13 pitches) and transfers from houses to sites (5 pitches) would be more than offset by vacancies arising from future transfers from sites to housing (23 pitches). Therefore, no additional pitches would be required up to 2016.

Meeting the Accommodation Needs of Gypsies and Travellers – July 2007

- 6.7 The GTAA (2005) predates the publication of further advice from Government on Gypsy and Traveller Accommodation Assessments (GTAAs). In order to achieve a consistent approach, Local Authorities on behalf of the South East England Partnership Board (SEEPB) were asked to critically evaluate their findings of their assessments as part of the partial review of the South East Plan, in light of the new advice, namely 'Meeting the Accommodation Needs of Gypsies and Travellers (July 2007)'.
- 6.8 As part of the assessment, Local Authorities were asked to clearly distinguish between the needs for permanent and transit pitches. As a result a revised needs assessment 'Towards a baseline distribution of future pitch provision' concluded that 47 permanent pitches in East Sussex and Brighton & Hove was a more realistic representation of need in the area.
- 6.9 From this revised needs based assessment, 2 options were devised to apportion the requirements across the Local Authorities. Option A – a needs-based distribution which apportioned 3 pitches in Rother. Option B – a more sustainable distribution, which balances the needs-led approach by considering a wider range of social, economic and environmental concerns, such as access to education and health or environmental constraints such as areas of AONB or flooding. Option B apportioned 7 pitches in Rother, which accounted for 15% of the provision required in East Sussex and Brighton & Hove. The approach looked at estimating the total amount of undeveloped land in each authority's area, subtracting from this total, the area covered by absolute environmental constraints (flood risk areas and Sites of Special Scientific Interest) in order to give the total amount of land it might be feasible to develop. The net effect of the more sustainable distribution of provision was to transfer a number of pitches to more rural areas of Rother and Wealden and away from Brighton and Hove. Although Rother has the greatest AONB coverage and no recorded pressure from unauthorised sites, some provision was seen as a reasonable reflection of

the level of stated preference from the travelling community and the possibility of small-scale opportunities.

- 6.10 In terms of provision post 2016, the ESCC report indicated that there would not be any need for additional pitches, due to existing vacancy rates extrapolated over the period.

Rother District Council's Response

- 6.11 Cabinet responded to the 'Meeting the Accommodation Needs of Gypsies and Travellers study (July 2007)' by endorsing the findings from the report.

Gypsy and Traveller Community's Response to the 2007 study

- 6.12 It is clear that some sections of the travelling community were unhappy with the proposals, with local Gypsies and Travellers and their representatives expressed strong criticisms. A number of common points were raised by members of the community:

- The extent of need for future permanent pitch provision is believed to have been seriously under-estimated because the underlying GTAA is regarded as being fundamentally flawed, due to insufficient engagement of Travellers in the process. The group had no confidence in the figures produced within the study. The final and overall requirement of 47 extra pitches 2006-2011 was not sufficient for the local requirement.
- The group had little confidence in the Accommodation Needs Assessment produced by David Couttie Associates. There were a number of concerns with the methodology, largely because there was not enough involvement from the Traveller community, but also concerning the consultant's inexperience in producing GTAAs.
- There was concern that there was not enough consideration made to the younger generation and their future accommodation needs.
- The group believed that a further assessment from the travelling community would be required. It was believed that only Travellers are in a position to track down, interview, and communicate with other Travellers.

Pat Niner Report (2007)

- 6.13 The South East England Regional Assembly (SEERA) undertook an independent benchmarking exercise, using DCLG's consultant, Pat Niner (From the Centre for Urban and Regional Studies at the University of Birmingham). Its purpose was to ensure all GTAAs had a consistency of approach across the region.

- 6.14 She concluded that overall the GTAA “probably overstates requirements [for permanent pitches] to a significant extent”. She further justified these conclusions through some double counting, most notably between concealed households and new family formation, through overestimation that all households on unauthorised encampments need residential pitches and overestimations regarding very high household formation rates, compared to average household size.
- 6.15 Pat Niner produced a summary audit report on the ‘Towards a Baseline Distribution of Future Pitch Provision’ Report and concluded that:
- The reduction in residential pitch numbers for 2006-2011 in the GTAA from 80-47 is well argued and reasonable.
 - She did not agree with the zero estimate for 2011-2016 and therefore recommended an additional 13 pitches over this period, based solely on a 3% per annum household growth rate.
- 6.16 However, her recommendations did not make any allowance for future vacancies within existing sites. A report to SEERA’s July 2008 Annual Meeting accepted the legitimacy of counting vacancies, identifying rates typically 3-8%. East Sussex applied the same vacancy rate of 5.7% pa (23 pitches) post 2011 which was accepted in the audit of our advice for 2006-11. The vacancy rate in our joint advice was based on past rates and recent experience also bears this out. From East Sussex monitoring of the stock of permanent residential public pitches two were vacated in 2007, 4 pitches in 2008 and one pitch in 2009 – an average of just over two per year.

Rother District Council’s Response

- 6.17 The Rother District Council statement at the Partial Review EiP, indicated that an additional 7 pitches between 2006-2016 (as stated in the Partial Review of the South East Plan – Recommendations for new policy H7 – 2009) is appropriate in light of all the analysis and local circumstances.

Consultation on the Partial Review of the South East Plan (2008)

- 6.18 In 2008, the South East Regional Assembly (SEERA) sought views on providing places for Gypsies and Travellers and Travelling Showpeople in the South East. For the South East as a whole, the consultation sought to provide a total of 1,064 pitches for Gypsies and Travellers up to 2016. This worked out to an average of around an acre of land in each local authority.
- 6.19 Four options were consulted on, each suggesting a different way to meet the overall number of pitches.

Option A

New pitches should ALL be provided as close as possible to where Gypsies and Travellers currently live. This may mean some council areas have no pitches.

For Rother this would mean 3 pitches.

Option B

New pitches should ALL be in the same general areas where Gypsies and Travellers currently live. Neighbouring councils would share the duty for providing new pitches but some council areas would have none.

For Rother this would mean 7 pitches.

Option C

HALF the new pitches should be in the same general areas where Gypsies and Travellers currently live. The other half would be spread across the region to make sure that all areas provide some pitches.

For Rother this would mean 6 pitches.

Option D

MOST new pitches should be in the same general areas where Gypsies and Travellers currently live. A quarter would be spread across the region to make sure that all areas provide some pitches.

For Rother this would mean 6 pitches.

Rother District Council's Response

- 6.20 Option B was favoured by Rother District Council, which sought to provide 7 pitches within the District. The level of provision proposed under this option was considered most appropriate to meet the needs arising in East Sussex and in Rother. Option B also apportioned the largest number of pitches from all the options from 2006-2016.

Gypsy and Traveller Community's Response

- 6.21 There were a number of responses from the Gypsy and Traveller community to the consultation on the Partial Review of the South East Plan. The responses picked out a number of issues with the evidence base which underpins the figures put forward within the consultation, but most comments make the same common point that the figures underestimate the real need for Gypsy and Traveller accommodation within the South East and all figures should be dealt with as a minimum requirement or revised upwards to better reflect needs.

Partial Review of the South East Plan – Recommendations for New Policy H7 (2009)

- 6.22 The Partial Review recommendations recommended that an additional 1,064 permanent residential pitches should be provided for Gypsies and Travellers between 2006-2016. The proposed policy H7 detailed that Rother should seek to provide 7 additional permanent pitches between 2006-2016 or 12.7% of the total provision in East Sussex to Rother District. It almost doubles existing permanent provision within the District.

Rother District Council Response

- 6.23 The Council stated in their report to the South East Plan Partial Review Examination in Public that it believes that an addition of 7 permanent pitches from 2006-2016 is appropriate in light of the analysis presented in the South East Plan and local circumstances (needs, opportunities and constraints).

Gypsy and Traveller Community Response

- 6.24 The Participant Statement submitted by Friends, Families and Travellers indicate that they do not think that the policy requirements will meet needs to 2016 because of problems associated with the GTAA's and their subsequent modification following on local authority advice. There were also concerns about how much weight was given to the comments of Gypsies and Travellers and their representative groups, particularly with concerns that the numbers proposed were much too low.

Unfinished South East Plan Partial Review Panel Report⁵

- 6.25 In May 2010, the Secretary of State announced its intention to revoke the Regional Spatial Strategies through the introduction of the forthcoming Localism Bill. However, the Panel Report was published in its unfinished form and it is important to consider these draft findings in light of the review of evidence in discussion with the Panel at the Examination.
- 6.26 The Panel considered in their findings that the calculations relating to need based on the revised calculations (discussed above) are reasonable (Gross need – 57 pitches across the GTAA area). However, the Panel rejected the GTAA assumption of including 2 pitches per year (10 between 2006-2011) as pitch turnover (particularly moves from pitches to housing) as a net source of supply. Therefore, the net need for additional permanent pitches across the GTAA area

⁵ The unfinished Panel Report was provided for information only and was made available to comply with a Freedom of Information/Environmental Information Regulations request. It is an incomplete piece of work which has not been subject to any form of quality assurance. The content does not represent the view of the Government and does not form any formal part of the planning system.

remain at 57 pitches. Therefore, this vacancy assumption should also not be extrapolated forward into calculations from 2011-2016.

- 6.27 The draft report considers that a 3% annual growth rate for the period 2011-2016 is reasonable for estimating likely future household formation rates to 2016. This was the same assumption considered in the work carried out by the East Sussex authorities prior to the Examination. This equates to a further 17 pitches for East Sussex to 2016, therefore representing a total of 74 permanent pitches (57 + 17) across the GTAA area.
- 6.28 The unfinished Panel Report also considers that some allowance should be made within the calculations relating to those Gypsy and Traveller households who reside in 'bricks and mortar' housing wishing to move back to pitches. Although not evidence based, the Panel recommend 10% of the 2006 baseline plus the recommended needs arising to 2011 should be applied to county totals. This equates to a further 11 pitches across the GTAA area, leaving a total of 85 permanent pitches (74 + 11).
- 6.29 The unfinished Panel Report then also makes an allowance known as 'regional redistribution', which equates to a total of 96 permanent pitches for Gypsies and Travellers across the GTAA area. However, the Panel Report is not explicit about how this figure is derived.

Table 2: Recommended pitch provision for East Sussex⁶

Location	Gypsies and Travellers		Travelling Showpeople	
	2006 Baseline	Recommended pitch provision	2006 Baseline	Recommended pitch provision
Brighton and Hove	0	19	0	0
Eastbourne	1	6	3	0
Hastings	0	5	0	0
Lewes	11	19	0	0
Rother	7	14	1	0
Wealden	29	33	1	0
East Sussex	48	96	5	0

⁶ Unfinished South East Regional Spatial Strategy Panel Report, 2010

7.0 Future Pitch Requirements

- 7.1 In considering the draft comments made within the unfinished Panel Report, it is clear that in developing the evidence base for the Core Strategy, there is an opportunity to take on board those recommendations which make a robust argument in determining the appropriate provision for permanent Gypsy and Traveller pitches.
- 7.2 It is considered that not including vacancies as a source of supply to offset need within the GTAA area is a clear, well made argument within the Panel Report and therefore these will not be included in the pitch calculations.
- 7.3 In the absence of more up to date and robust evidence, it is clear that there should be a calculation towards annual household growth formation rates within the GTAA area. The unfinished Panel Report recommends a 3% compound annual growth rate on the 2006 baseline plus the planned provision from 2006-2011.
- 7.4 The unfinished Panel Report considered it appropriate to make a provision of an 10% of the baseline, plus the backlog to 2011 to account for those Gypsies and Travellers living in 'bricks and mortar' housing, wishing to move back to sites. The Panel Report fully acknowledges that this is not evidence based and based on anecdotal evidence. Further work carried out by Rother District Council to consider the numbers of Gypsies and Travellers in housing, involved contacting Registered Providers of Social Housing to determine these numbers. Registered Providers who work within the District did not consider that there were a large number of Gypsies and Travellers living in housing within the District and were only able to identify a few households (less than 5) which comprised of Gypsy families. Therefore, it is not considered appropriate in this instance, to make an additional allowance for Gypsy and Traveller households within 'bricks and mortar' housing.
- 7.5 The Panel Report also made an allowance for regional redistribution of pitches to make more equitably distribute sites across the region. However, in the interests of localism and the need to provide sites based on local need within the area, there appears to be no clear basis for including a regional redistribution of pitches within the new calculations.

Table 3: Calculated Gypsy and Traveller permanent pitch provision 2006-2016

Area	2006 Baseline provision	2006-11 Gross backlog of need – no vacancy offset – Option A distribution		Planned 2011 stock of pitches = baseline plus backlog		Planned 2016 stock = 2011 stock + 3% pa compound growth		2006 – 16 Provision = 2016 stock less baseline
		No	Distribution	No	Distribution	actual	rounded	
Eastbourne	1	1	1.8%	2	1.9%	2.30	2	1
Hastings	0	3	5.3%	3	2.9%	3.47	3	3
Lewes	11	10	17.5%	21	20.0%	24.30	24	13
Rother	7	5	8.8%	12	11.4%	13.90	14	7
Wealden	29	24	42.1%	53	50.5%	61.40	61	32
Brighton & Hove	0	14	24.6%	14	13.3%	16.20	16	16
East Sussex	48	43	75.4%	91	86.7%	105.37	105	57
GTA Area	48	57	100.0%	105	100.0%	121.57	122	74

7.6 In line with the general provisions for the identification of land for housing and the maintenance of a sufficient, continuous supply of available sites, it is proposed to increase permanent pitch provision beyond 2016 based on a 3% compound increase per annum to account for household formation rates of Traveller households.

Table 4: Calculated Gypsy and Traveller permanent pitch provision 2006-2028

Area	2006 Baseline provision	Planned 2016 stock = 2011 stock + 3% pa compound growth		2026 stock = 2016 stock + 3% pa compound growth		2028 stock = 2026 stock + 3% pa compound growth		2011 – 28 Provision = 2028 stock less baseline
		actual	No	actual	rounded	actual	rounded	
Rother	7	13.90	14	18.69	19	19.83	20	13

7.7 Given that 2 permanent pitches have been provided within the District from 2006-2011, a further 11 pitches should be provided to 2028, as suggested above.

Travelling Showpeople

- 7.8 When the GTAA was undertaken in 2005, the needs of Travelling Showpeople were not specifically considered as part of its remit. As a consequence a specific joint consultation with the other authorities in East Sussex was conducted in Summer 2007 to address this evidence gap. The consultation revealed that there were 5 travelling showpeople households in 4 family groups of Travelling showpeople within East Sussex, with 1 household residing in Rother District. The Showmen's Guild report show that these groups all have adequate housing and storage accommodation to meet their current demands and they are not seeking any further provision for additional yards.
- 7.9 Given the results of this consultation, it is not considered that there is an unmet demand for pitches Travelling Showpeople in Rother. This approach is consistent with the findings within the unfinished Partial Review of the South East Plan Regional Spatial Strategy Panel Report, which recommended that there was no need for additional provision for Travelling Showpeople within Rother District.

Transit site provision

- 7.10 There are two transit sites within the GTAA area, which include Bridies Tan, Lewes (9 pitches) and Horsedean, Brighton (23 pitches); both sites have been refurbished recently.
- 7.11 As detailed earlier, the evidence from the GTAA considered that the GTAA area required 80 additional (unspecified) pitches. However, given the need to distinguish between the different types of pitches, the following advice was produced by the county group.

Transit needs in East Sussex and Brighton & Hove – Advice paper

- 7.12 As a request by the South East England Regional Assembly (SEERA), the East Sussex and Brighton & Hove county group produced final advice to the Assembly, including a qualitative assessment of the demand for transit provision.
- 7.13 The county group devised 2 methods of calculating potential need within the area (the residual⁷ and seasonal differences methods⁸).

⁷ The residual method looks at the number of Traveller households living in unauthorised encampments at the time of the GTAA, some of whom may require permanent provision. The residual method assumes that the needs of all other households who are also camping on unauthorised sites at the time would be best met by additional transit provision.

⁸ The seasonal differences approach estimates the demand for transit pitches by comparing Caravan Counts for January and July, and by looking at time-series data to counter the weaknesses potentially associated with any snapshot data for a single year.

Table 5: Residual Method

	Total number of caravans on Ues in July 2005	Estimated number of households ⁹ living on Ues in July 2005	Number of households on Ues believed to require permanent pitch provision	Residual number of households on Ues needing transit provision.
Brighton & Hove	48	37 ¹⁰	8	29
East Sussex	22	17	12	5
GTAA Area	70	54	20	34

Table 6: Seasonal-Differences Method

	Total number of caravans on Ues in January 2004-2006	Average number of caravans on Ues in July 2004-2006	Difference in annual average figures for January and July	Estimated number of households needing transit provision
Brighton & Hove	8	42	34	26 ¹¹
East Sussex	9	14	5	4
GTAA Area	17	56	39	30

7.14 What was clear from the advice paper was that there is a clear seasonal pattern to the nature of travelling, particularly to and from Brighton & Hove. It also indicates levels of potential need for transit provision that are not dissimilar to those suggested by the residual approach.

7.15 Based on the information presented in the Advice paper, the findings indicate that some further modest provision of transit sites in the County (in addition to that already provided at Bridies Tan, Lewes and Horsedean, Brighton). The Advice paper further suggested that this additional provision for East Sussex (4-5 pitches) could be provided on one or two small sites further along the coast to

⁹ These estimates assume an average of 1.3 caravans per household, based on the evidence from the GTAA

¹⁰ More recent monitoring information suggests that UEs in Brighton & Hove are mainly occupied by Irish Travellers with larger families. The City Council therefore believes that it would be more appropriate to use the national average ratio of 1.7 caravans per pitch to estimate the number of households living on UEs in the city. If this national average is applied to the July 2005 Counts, it would suggest a total of 28 households on UEs in Brighton & Hove at that time, 20 of whom might need transit provision

¹¹ Again, the City Council believe it might be more appropriate to assume an average of 1.7 caravans per pitch/household. This would reduce the potential level of need for further transit provision in Brighton & Hove from around 26 to 20 pitches

meet the needs of Travellers moving through East Sussex (Eastbourne, Hastings, Rother and Wealden).

South East England Regional Gypsy and Traveller Transit Study

- 7.16 As part of the preparatory work for the partial review of the South East Plan, Pat Niner conducted a South East England Regional Gypsy and Traveller Transit Study, in order to assess appropriate provision for transit sites across the region.
- 7.17 The regional study looked at the quantitative, qualitative and anecdotal evidence available in order to identify patterns of transit movement in and through the South East region and to provide an indication of the scale, type and broad location of need or demand for any additional transit provision. Although the study does not carry any formal planning status, it was hoped that in compiling the evidence for transit need, county groups would give significant weight to the study along with any other evidence and advice suitable to achieve an appropriate distribution of transit sites and stopping places.

Table 7: Baseline provision of transit accommodation

County Group	Number of pitches			Location
	Public	Private	Total	
East Sussex/Brighton & Hove	33	0	33	Brighton & Hove (23), Lewes (10)

Table 8: Indicators of need for transit provision by County Group

County Group	Indicative transit advice/ GTAA	Unauthorised encampment caravans 2004-07		
		Winter	Summer	Change
East Sussex/Brighton & Hove	2 sites	24	84	60

- 7.18 The Study identified East Sussex/Brighton & Hove as a priority area for transit provision in the South East given the overall average caravans numbers between 2004-09 and the average summer excess over the same period. The Study also identifies Brighton & Hove and Wealden as 'hotspots' where transit provision could be sought. At the time of drafting, information provided for the Study revealed that East Sussex/Brighton & Hove has 17% of the encampments in the region, although further evidence indicates that the majority of the encampments in this period lasted for less than a week.

Table 9: Average caravan count analysis: January 2004-2009

County Group	Average caravans (Jan 2004- Jan 2009)	Average summer excess
East Sussex/Brighton & Hove	52	+44

- 7.19 The Study identified a number of shortcomings in the DCLG Caravan Counts to suggest that alone they do not provide a credible evidence base for transit site planning. However, the Study reinforced this evidence by holding a number of workshops which included Gypsy and Traveller representatives to further bolster this information. Further information was collected from Local Authorities and partners regarding unauthorised encampments, whilst these are not comprehensive and are likely to under-rather than over-state numbers, identify East Sussex/Brighton & Hove amongst some of the areas in the region which experience some of the highest numbers of encampments.
- 7.20 Evidence from the workshops suggest that major routes for travel are an indication of possible locations for transit sites, including Sussex (A27), a number of Gypsy and Traveller bodies also stressing the importance of having a network of places in addition to these route-oriented locations.
- 7.21 The Study considered a small number of methodologies (4) to calculate the transit pitch requirements for the region and apportioned them between each County group. The number of sites apportioned to East Sussex/Brighton & Hove ranged from 23-30 pitches (including existing provision), depending on the methodology used. The preferred methodology (a policy-oriented option aimed at creating a network of transit sites and stopping places) considered that 8 additional pitches (14 caravans) on 2 sites would be appropriate for East Sussex/Brighton & Hove.
- 7.22 The Study concludes:
- Evidence from the GTAAs, local authority advice, the Caravan Count and records of unauthorised encampments is imperfect and likely to understate current levels of unauthorised encampments.
 - Estimates of need for transit provision based solely on evidence from the Caravan Counts and records of unauthorised encampments would not be credible to Gypsy and Traveller communities.
 - It is impossible to distinguish between the need for residential and transit pitches arising from unauthorised encampments.
- 7.23 Due to the general mistrust of the Caravan Count and records of unauthorised encampments, and specifically because of the unknown extent of distortion introduced by different approaches to enforcement, it would be unwise to place too much weight on the pattern of encampments as evidence of transit needs.

7.24 The Study therefore concludes that an assessment of need based on the principles of creating a network of transit accommodation as well as harder 'evidence' is recommended, with the basic assumption that there should be at least 4 transit sites or stopping places in each county group providing on average 4 pitches. There is no necessary assumption in the figures that all pitches will be provided on formal transit sites. Some could be provided less formally as stopping places.

Table 10: Recommended additional transit need

County Group	Additional need		Notes
	Pitches	Caravans	
East Sussex/ Brighton & Hove	8	14	Creating a network by providing 2 x additional sites x 4 pitches (current provision 2 sites)

Unfinished South East Plan Partial Review Panel Report¹²

- 7.25 Transit provision was also considered as part of the South East Plan Partial Review. The Panel broadly supported the approach considered in the Regional Transit Study (above), which gave the broad recommendation in creating a network of sites across the region and that at least 4 sites should be provided within each county group, with an average of four pitches on each site.
- 7.26 The unfinished Panel Report therefore recommended that East Sussex and Brighton and Hove should provide 8 additional transit pitches, in either 1 site of 8 pitches or 2 sites of 4 pitches.
- 7.27 The Council will work with East Sussex County Council, Eastbourne Borough Council, Hastings Borough Council and Wealden District Council to identify suitable land to deliver sites to meet the locally defined transit needs.

Site Selection Criteria

- 7.28 National guidance states that local authorities should in the Core Strategy set out the criteria for the location of gypsy and traveller sites which will be used to guide allocation of sites the relevant DPD. These criteria will also be used to meet unmet demand. Given the need identified above, it is important to consider the criteria that would need to met when identifying potential sites for Gypsies, Travellers and Travelling Showpeople and for determining planning applications.

¹² The unfinished Panel Report was provided for information only and was made available to comply with a Freedom of Information/Environmental Information Regulations request. It is an incomplete piece of work which has not been subject to any form of quality assurance. The content does not represent the view of the Government and does not form any formal part of the planning system.

8.0 National policy and guidance

Planning Circular 01/2006

8.1 The Circular considers a number of matters which should be considered in developing policy criteria for the consideration of Gypsy and Traveller sites, including:

- Local planning authorities in rural areas should include a 'rural exception site policy' in the relevant DPD,
- Planning permission for Gypsy and Traveller site in nationally recognised designations¹³ should only be granted where it can be demonstrated that the objectives of the designation will not be compromised by the development,
- Local landscape and local nature conservation designations should not be used in themselves to refuse planning permission for Gypsy and Traveller sites,
- Sites should respect the scale of, and not dominate the nearest settled community,
- Sustainability, in terms of proximity to distance to services (including health services and schools),
- Not locating sites in areas of high flood risk,
- Not locating sites on significantly contaminated land,
- Good vehicular access from the public highway, as well as parking, turning and servicing on site
- To consider a sequential approach to the consideration of sites for Gypsies and Travellers,

Good Practice Guidance on Designing Gypsy and Traveller Sites¹⁴

8.2 The guide provides specific guidance for designing Gypsy and Traveller sites for both permanent and transit sites and also temporary stopping places. The guide considers that sites identified for Gypsies and Travellers should not be in locations that would be inappropriate for ordinary residential dwellings. The guide refers to a number of criteria which should be considered when selecting sites for Gypsies and Travellers, these include:

¹³ Sites of Special Scientific Interest, National Nature Reserves, National Parks, Areas of Outstanding Natural Beauty, Heritage Coasts, Scheduled Monuments, Conservation Areas, Registered Historic Battlefields, and Registered Parks and Gardens)

¹⁴ CLG, 2008.

- Good access to major roads and/or public transport services
- Good access to local services including employment, education, health and shopping facilities
- Co-existence between the site and community should be promoted
- Consideration should be made to the ground conditions and levels on the site
- Sites should provide visual and acoustic privacy for the residents
- Sites should not be located in areas of high flood risk
- Sites should not be situated near refuse sites, industrial processes or other hazardous places

8.3 The guide also promotes social inclusion within a community in order to reduce tension with the settled community.

Current Local Plan Policy

8.4 The current Local Plan contains a criteria based policy for considering sites for Gypsies, Travellers and Travelling Showpeople, developed in line with current Government guidance. At the time of adoption, evidence suggested that there was no demand for additional pitches within the District.

Policy HG6: Sites for Gypsies and Travelling Showpeople

Proposals for new gypsy sites, extensions to existing gypsy sites and sites for travelling showpeople will be permitted provided the following criteria are met:

- (i) There is no adverse impact on the character of the countryside, particularly in the High Weald Area of Outstanding Natural Beauty;**
- (ii) The local environment and residential amenities will not be adversely affected;**
- (iii) There is a satisfactory means of vehicular access and the local road network is adequate;**
- (iv) The site is conveniently located in relation to schools and other community facilities.**

Preferred Approaches to Consultation

- 8.5 In November 2008, the Council consulted on their Core Strategy Preferred Strategy Directions, detailing the preferred strategy for Gypsies and Travellers (below).

The Preferred Strategy for Gypsies and Travellers is to:

Positively address legal responsibilities regarding the provision of sites for Gypsies and Travellers.

This will be achieved by:

Permanent Site Provision

(a) Identifying sufficient land in its Sites Allocations DPD to accommodate the future requirements set out by SEERA (current draft proposals are between 3 and 7 permanent pitches).

(b) In the interim, assessing all proposals and applications for new pitches using policy DS1 of the Local Plan together with relevant Government guidance.

Transit Site Provision

The Council will work with ESCC, Eastbourne Borough Council, Hastings Borough Council and Wealden District Council to identify suitable land to deliver a transit site in line with locally identified needs.

Gypsies and Travellers Sites

The Council, in conjunction with the other local authorities in East Sussex, will agree a robust, generic, criteria-based policy for all local authorities engaged in allocating and/or providing gypsy and traveller sites in East Sussex. Criteria will include:

- (i) The needs of gypsies and travellers including for work and travel patterns
- (ii) Priority given to sites in proximity to settlements with access to employment, education, health, shopping and other local services and infrastructure
- (iii) Consideration can then be given to more rural locations, particularly where they are well located in relation to major roads and/or public transport
- (iv) Potential for reuse of vacant/derelict sites and surplus public sector land
- (v) The location of sites within the AONB must demonstrate that they do not compromise the objectives of designation.
- (vi) Avoidance of:
 - a. Sites on or near refuse tips, significantly contaminated land
 - b. Functional floodplains

c. SACs, SPAs, Ramsar sites and other nationally recognised designations
(vii) Suitability, availability and achievability of sites.

8.6 There were a number of responses to the preferred strategy, common themes include:

- Consideration towards a site size limit in relation to surrounding communities,
- Any consideration of Gypsy and Traveller sites should adhere to the same assessment as other types of development, including:
 - avoidance of Source Protection Zones, contaminated land and sites on or near refuse tips,
 - avoidance of Flood Zones 3a and 3b,
- Accommodation should be close to service centres,
- Consideration should be made to any impact on SSSIs or AONB when identifying sites.

Consideration of site criteria

8.7 As detailed above, there is clearly a demand for additional pitches within the District and in order to be able to consider sites either for allocation or through sites coming forward as planning applications, it is appropriate to detail criteria for assessing such potential Gypsy & Traveller and Travelling Showpeople sites.

8.8 What is clear is that such criteria should be consistent with national guidance and in the absence of a Regional Spatial Strategy should bridge the gap from national through to local policy. The main issues to consider are those which are relevant to the local area such as the impact on nationally designated areas such as the High Weald Area of Outstanding Natural Beauty (AONB), site size and proximity to local services.

8.9 The Local Plan policy HG6 on Gypsies and Travellers is used currently in practice to assess the suitability of potential Gypsy sites when planning applications are submitted. The consultation process into the Core Strategy Preferred Strategy Directions further built on this, by looking at refining and updating these criteria to bring it in line with up-to-date national guidance. As considered above, some minor changes to wording were suggested by consultees, but the principles of the criteria based policy were not questioned.

8.10 Consideration to the criteria which are deemed appropriate for a criteria-based policy are shown below.

Criterion	Reasoned justification
Proximity to settlements with access to employment, education, health, shopping and other local services and infrastructure	Any potential Gypsy and Traveller site should have a good relationship with existing settlements and its access to services (schools, shops, GPs etc) including through means other than the car. Although given the largely rural nature of the District, it is acknowledged that in some cases it may be difficult to give access to all services. In this event, priority will be given to sites which are close to public transport networks.
Consideration can then be given to more rural locations, particularly where they are well located in relation to major roads and/or public transport	Consideration can be made towards more rural sites within the District where they are well located in terms of road access or access to public transport. This is consistent with a sequential approach to development.
Avoidance of sites on or near Source Protection Zones, contaminated land and sites on or near refuse tips	National policy requirement
Avoidance of Functional floodplains and Flood Zones 3a and 3b	National policy requirement
Avoidance of SACs, SPAs, Ramsar sites and other nationally recognised designations	Development in such national designations should be avoided, unless it can be demonstrated that the potential development would not have any adverse impact on the nature of the designation.
No adverse impact on the character of the countryside, particularly in the High Weald Area of Outstanding Natural Beauty (AONB)	Any potential site within the High Weald AONB would need to demonstrate that it would not have an adverse impact on this designation. However, such a designation would not preclude sites from being considered in these areas.

Criterion	Reasoned justification
Satisfactory means of vehicular access and the local road network is adequate	Safe vehicular access is imperative for any potential Gypsy and Traveller site. Any access must be able to accommodate large vehicles and should also be suitable for emergency vehicles and waste collection.
Local environment and residential amenities will not be adversely affected	Potential Gypsy and Traveller sites should not have an adverse impact on the local environment and residential amenity. Any allocations or planning applications should have regard to any potential impact on character, scale, layout, lighting, boundary treatment, noise etc on residential properties within the locality.
No adverse impact on landscape character	Local topography and landscape form are important features of the landscape, both in a local and wider context. It is important that any potential Gypsy and Traveller site be able to integrate sufficiently into its surroundings, either through natural containment or sympathetic screening and landscaping. Sites which are highly exposed within the landscape may be inappropriate.
Is the site level?	Any potential site should be able to accommodate hardstandings for caravans and mobile homes. Therefore sites should be level or capable of being made level.
Availability of services and site deliverability	Sites which already have connections to services such as water, electricity and foul drainage would be given priority over those without such services.
Is the site suitable in terms noise/pollution/potentially incompatible uses?	Any site for Gypsies and Travellers should adhere to normal planning requirements for housing. However, mobile homes and caravans do not meet national building standards ventilation, noise insulation for example. Therefore it would be inappropriate to consider sites which are close to incompatible uses which would have an adverse impact on these factors.

Criterion	Reasoned justification
Site size	Interviews with Gypsy and Traveller families as part of the GTAA shows that small sites work better from their point of view and they are considered more appropriate in the context of local environment. Views were expressed that sites for small family groups worked well. However some sites may be appropriate for expansion to allow increased amenity space, or extensions to accommodate new family members.

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Appendix 2: Rother District - Count of Gypsy and Traveller Caravans: Historical counts										
	Authorised sites (with planning permission)				Unauthorised sites (without planning permission)				Total (Authorised & Unauthorised Sites)	
Rother Count	No. of caravans			Total (Authorised Sites)	No. of Caravans on Sites on Gypsies own land		No. of Caravans on Sites on land not owned by Gypsies			Total (Unauthorised)
	Socially Rented	Temporary Planning Permission	Permanent Planning Permission		Tolerated	Not Tolerated	Tolerated	Not Tolerated		
Jul '10	7	2	2	11	1	1	0	0	2	13
Jan '10	7	1	1	9	2	2	0	0	4	13
Jul '09	7	0	0	7	0	5	2	0	7	14
Jan '09	7	0	0	7	0	5	3	2	10	17
Jul '08	7	0	0	7	3	4	2	5	14	21
Jan '08	7	0	0	7	4	5	3	0	12	19
Jul '07	7	0	0	7	0	0	0	0	0	7
Jan '07	6	0	0	6	0	0	0	0	0	6
Jul '06	8	0	0	8	0	0	0	0	0	8
Jan '06	7	0	0	7	0	0	0	0	0	7
Jul '05	9	0	0	9	0	0	0	0	0	9
Jan '05	10	0	0	10	0	0	0	0	0	10
Jul '04	7	0	0	7	0	0	0	0	0	7