

Rother District Council	ID 34
Sub-Regional Assessment & Provision - East Sussex / Brighton & Hove	Matter 2B

**Partial Review of the Regional Spatial Strategy for South East England
Provision for Gypsies, Travellers and Travelling Showpeople**

Examination in Public

Statement by Rother District Council

**Matter 2B –Sub regional assessment and provision:
East Sussex and Brighton & Hove**

Introduction

- 1 The District Council has formally considered the Partial Review on 'Provision for Gypsies, Travellers and Travelling Showpeople' both at the time of the SEERA consultation in Autumn 2008 and again in relation to its subsequent 'Recommendations for new policy H7', published in June 2009.
- 2 The District Council's representations, as well as its consideration of the Partial Review, provide the basis for this Statement.
- 3 This Statement should be read in conjunction with that by East Sussex County Council (ESCC) in respect of Matter 2D. The ESCC statement more fully addresses the work undertaken by the local authorities in the county, together with Brighton & Hove, in terms of the GTAA needs assessment (Core Document 2.1) and subsequent joint advice to SEERA (Core Document 7.4d).

Question (i) - Does the GTAA and any subsequent adjustments at a local /county level represent a robust and credible evidence base for the Policy?

In particular:

- a) Are the assumptions made with regard to both the demand for and supply of pitches reasonable?
- b) To what extent can the pitch turnover figures and assumptions be regarded as a net and continuing source of supply?
- c) Have the needs of gypsies and travellers currently living in housing been adequately surveyed and assessed?

Rother District Council	ID 34
Sub-Regional Assessment & Provision - East Sussex / Brighton & Hove	Matter 2B

- d) Are the assumptions made about need arising from unauthorised encampments reasonable?
- e) Have the needs arising from any sites being occupied on the basis of a temporary planning permission (including any granted planning permission since the completion of the relevant GTAA) been taken into account?

a) Demand and supply of pitches

- 4 The local authorities appointed independent consultants David Couttie Associates (DCA) to carry out the GTAA. As ESCC explains in its Matter 2B Statement, the GTAA was undertaken broadly in line with later DCLG guidance.
- 5 The local authorities carefully considered the GTAA and recommended adjustments in their joint advice to SEERA. Of particular note, the GTAA did not distinguish between needs for permanent and transit pitches, which resulted in an exaggeration of demand for permanent pitches in the Council's view.
- 6 The local authorities' advice, for 47 pitches 2006 – 2016, was subject to local consultation during July and August 2007, including an exhibition at Bexhill. (see Core Document 7.4b).
- 7 It is notable that Pat Niner's independent assessment concluded that the overall figure of 47 permanent pitches for the GTAA area for 2006-11 is "*well argued and reasonable*" (Core Document 2.20 page 34).
- 8 There is a difference between what the local authorities regard as reasonable assumptions for 2011 – 2016 and what Pat Niner recommends. This is specifically addressed in the ESCC Statement.
- 9 Notwithstanding the above, the Council believes that an addition of 7 permanent pitches 2006 – 2016 in Rother, as proposed in Table H7a, is appropriate in light of the analysis and local circumstances, as discussed further in relation to question (iii).

b) Pitch turnover figures and assumptions

- 10 In support of an allowance for future vacancies, the Council is aware of a continuing turnover in pitches. The ESCC Statement elaborates upon this.

Rother District Council	ID 34
Sub-Regional Assessment & Provision - East Sussex / Brighton & Hove	Matter 2B

c) Gypsies and Travellers currently living in housing

- 11 As the ESCC Statement advises, the DCA survey covered households living in housing. The local authorities have taken 'need' to be those in housing who had registered on site waiting lists. Pat Niner considered this reasonable, albeit that it should be kept under review (Core Document 2.19 page 141).

d) Need arising from unauthorised encampments

- 12 Local authority records of those households on unauthorised encampments who were known to need permanent accommodation were used for the GTAA. The 'Caravan Counts' for Rother have shown a generally low level of unauthorised encampments.
- 13 It is pointed out that the occupants of two unauthorised sites in Rother that are reflected in the most recent Caravan Count have been re-housed in permanent housing locally.
- 14 The number of caravans in the district on sites without planning permission currently stands at only two.

e) Needs arising from any sites being occupied on the basis of a temporary planning permission (including any granted since completion of the GTAA)

- 15 The GTAA recorded only 6 privately owned pitches with planning permission, none of which was in Rother.

Question (ii) - Does the provision take adequate account of the needs of New Travellers? Can and should they be distinguished from van dwellers for the purposes of the policy?

- 16 This question is best addressed by Brighton & Hove City Council, as providing for New Travellers, or van dwellers, have not been an issue for Rother district.

Rother District Council	ID 34
Sub-Regional Assessment & Provision - East Sussex / Brighton & Hove	Matter 2B

Question (iii) - Are the proposed numerical requirements of Table H7a for East Sussex as a whole and for individual local planning authorities a fair reflection of the planning and sustainability constraints and opportunities for delivery of new Gypsy and Traveller sites in East Sussex and the preference of Gypsies and Travellers?

- 17 The Council considers that the provision for Rother district to be appropriate in the light of local needs, opportunities and constraints.
- 18 Table H7a of the Partial Review assigns 7 permanent pitches, or 12.7% of total provision, to Rother district. This is a little more than the 9.2% of households responding to the GTAA who live in Rother (see paragraph 1.4.3 of the GTAA – CD2.1). It also nearly doubles existing provision.
- 19 The Partial review requirement of 7 pitches within Rother district is also regarded as reasonable in terms of the high environmental constraints. Most notably, 82% is within the High weald Area of Outstanding Natural Beauty, while some 9% of the district is subject of international or national nature conservation designations. Outside of the AONB, there are also large tracts within flood risk areas.
- 20 It is further noted that Pat Niner (Core Document 2.20, page 33) regarded the ‘more sustainable distribution’ option, which took due account of local constraints and opportunities, as *‘sophisticated and well reasoned’*.
- 21 The allocation of 7 permanent Gypsy and Traveller pitches to Rother district is therefore regarded as consistent with local needs, makes provision for growth in these and has some allowance for further provision consistent with the significant constraints.
- 22 The Council is currently working alongside the local Gypsy and Traveller community, and other agencies, to identify sufficient suitable sites in the district in accordance with Policy H7a.

Rother District Council	ID 34
Sub-Regional Assessment & Provision - East Sussex / Brighton & Hove	Matter 2B

Travelling Showpeople

23 Although the GTAA did not include Travelling Showpeople, consideration has been given to whether any provision is appropriate.

24 As stated in the Council's formal representation, the Council does not believe that there is, or is likely to be, a need to set aside land for any Travelling Showpeople's pitches.

25 The Council is not aware there were any Travelling Showpeople's pitches in Rother in 2006, even though reference has been made by the Showman's Guild to a family in Bexhill.

26 In any event, in response to the local authorities' consultation, the Showmen's Guild has advised that there is no demand for additional yards in the whole GTAA area. However, it seeks that LDFs should include appropriate criteria for judging such applications. (Core Document CD7.4c - Appendix B).

27 The Council agrees with this position and can include appropriate local criteria in its LDF to provide a basis for any application if this is deemed appropriate.

28 It is pointed out that the preferred distribution option (Option D) approved by SEERA in March 2009 did not propose any additional pitches in Rother. However, the addition of a pitch was recommended by SEERA apparently as a consequence of further work on constraints mapping across the region.

29 Hence, it is concluded that the requirement for a pitch for Travelling Showpeople in Table H7b is a marginal proposal based on very general sieve mapping, and not justified having regard to more local evidence of need. The figure for Rother should therefore be zero.