Following the publication of PPTS 2024, the definition of Gypsies and Travellers within the revised guidance has been broadened to be more inclusive. This updated definition aligns closely with the 'ethnic' definition used in this report, which identifies Gypsies and Travellers based on their cultural identity, heritage, and way of life. For practical purposes, the two definitions are considered equivalent, as both address the accommodation needs of these communities in a manner that respects their cultural practices and legal rights. This alignment ensures that the report's findings remain consistent with current national policy, allowing local authorities to address the identified needs effectively while adhering to the latest guidance under PPTS 2024. (*RRR Consultancy,* 20 January 2025)

Since the publication of the East Sussex GTAA, the terminology surrounding accommodation needs for Gypsies and Travellers has evolved to adopt a more inclusive language. The term 'psychological aversion' has been replaced by 'cultural preference' to better reflect the nuanced reasons why some Gypsies and Travellers living in bricks-and-mortar accommodation may require a pitch. This shift acknowledges that the desire for a pitch can stem not only from adverse psychological effects, but also from a broader cultural preference to live within a community that aligns with their traditions and way of life. Importantly, this change in terminology does not impact the accommodation needs identified in this assessment. (*RRR Consultancy,* 20 January 2025)

East Sussex Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment

May 2022

Version 3

RRR Consultancy Ltd

Please note that minor amendments to the following were undertaken in March 2023 to correct minor typographical errors in the original report and to confirm the base date:

- Para 1.1 Inserted base date of 1 April 2021.
- Table S1: Summary of accommodation needs (pitches) 2021-40 for the study area.
- Table S3: Summary of accommodation needs (pitches) 2021-40 for Hastings.
- Table S7: Summary of accommodation needs (pitches) 2021-40 for Rother.
- Para 1.1 Inserted base date of 1 April 2021.
- Tables 5.15 and 5.16: Summary of accommodation needs (pitches) 2021-40 for Hastings.
- Para 6.10: amended 5-year growth figure to 17.3%
- Tables 8.3 and 8.4: Summary of accommodation needs

Please note that minor amendments were also undertaken in October 2024 to correct an error in tables S1 and 5.13 and to update the version number:

- Table S1: Summary of accommodation needs 2021-2040 (pitches) (study area) correction to ethnic definition column at rows 2, 3 and 5
- Table 5.13: Summary of accommodation needs 2021-2040 (pitches) (study area) correction to ethnic definition column at rows 2, 3 and 5
- Change version 2 to version 3

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Executive Summary

Introduction

S1. In November 2020, the East Sussex local authorities of Eastbourne Borough Council, Hastings Borough Council, Lewes District Council, Rother District Council and Wealden District Council, and the South Downs National Park Authority (SDNPA) commissioned *RRR Consultancy Ltd* to undertake a Gypsy and Traveller Accommodation Assessment (GTAA) for the period 2021-2040. The results will be used as an evidence base for policy development for the new Local Plans and supersede any previous GTAA (including any levels of accommodation needs calculated prior to this assessment) for the East Sussex local planning authorities. The base date for the report is 1st April 2021.

S2. The requirement to assess the accommodation needs of Gypsies and Travellers and Travelling Showpeople is established through national guidance contained in Planning Policy for Travellers (PPTS) (DCLG, 2015). Throughout the report, this policy document will be referred to as PPTS 2015 or simply PPTS.

S3. To achieve the study aims, the research drew on a number of data sources including:

- Review of secondary information to include a review of national and local planning policies, recently undertaken GTAAs and analysis of secondary data. This included analysis of the most recently published (July 2021) Department for Levelling Up, Housing and Communities (DLUHC) Traveller Caravan Count to determine trends in the population of Gypsies and Travellers, Travelling Showpeople and boat dwellers (due to Covid-19, no counts took place in July 2020 or January 2021), unauthorised encampment data, enforcement data and approved and refused planning permissions.
- An online survey, and interviews with key stakeholders providing qualitative data regarding the accommodation needs of all four community groups.
- Extensive surveys of Gypsies and Travellers, covering a range of issues related to accommodation and service needs.
- Consultation with marinas and other related boat dweller groups in order to identify Boat Dweller need (remotely due to Covid-19 restrictions).

S4. The above provided an extensive range of quantitative and qualitative data enabling a robust and reliable assessment of accommodation needs. The consultation was undertaken in a Covid-19 safe manner (i.e. it followed government guidance and restrictions). However, this meant that consultation with households was delayed and some consultation was undertaken using remote methods (e.g. over the telephone), until some level of face-to-face consultation could take place.

Policy context

S5. In August 2015, the Government published its amended PPTS document, which replaced the previous guidance and circulars relating to Gypsies and Travellers and Travelling Showpeople. The guidance emphasised the need for local authorities to use evidence to plan positively and manage development. Whilst it is clear that the 2015 PPTS excludes those who have ceased to travel permanently as being Gypsies and Travellers (for planning purposes), it does not explicitly state how the new definition should be interpreted in relation to other factors such as whether families travel for economic or work purposes.

S6. Given differences in defining Gypsies and Travellers, this GTAA provides three need figures: first, one based on the ethnic identity definition; second, based on the needs of families who have *not* permanently ceased to travel (i.e. based on the PPTS 2015 definition); and third, based on the 'travel to work' interpretation of PPTS 2015. The three accommodation needs definitions are discussed in more detail in Chapters 2 and 5.

S7. In March 2016, the Government published its draft guidance for local housing authorities on the periodical review of housing needs for caravans and houseboats. It states that when considering the need for caravans and houseboats, local authorities will need to include the needs of a variety of residents in differing circumstances including, for example, caravan and houseboat dwelling households and households residing in bricks and mortar dwellings.

S8. According to National Planning Policy Framework (NPPF) (2021) along with related planning guidance, a sound local plan seeks, as a minimum, to meet the area's objectively assessed needs, and address the needs of groups with specific housing requirements.

S9. There is an expectation that whilst calculating the level of additional accommodation need for Gypsies and Travellers who meet the PPTS 2015 planning definition and identifying how that need will be met (i.e. additional land supply), that local authorities also need to identify the level of need and means by which they have considered and will address the additional accommodation needs of those who do not meet this definition. This related to all who are ethnically recognised as Gypsies and Travellers (in line with the Humans Rights Act 1998 and the Equalities Act 2010). Both the Human Rights Act 1998 and Equalities Act 2010 protect Gypsies and Travellers' cultural and ethnic way of life, including living in a caravan.

S10. 5 out of the 6 planning authorities are currently updating their Plans, working to broadly similar timelines. In terms of existing adopted Plans, all study area local authorities

have developed a criteria based policy in their adopted Local Plans to determine suitable locations for new sites and yards.

Population Trends

S11. In November 2020, there were a total of 76 occupied authorised Gypsy and Traveller pitches in the study area consisting of a combination of private local authority owned and managed pitches, 9 transit pitches, and 17 pitches located on unauthorised developments. There is only one recorded Travelling Showpeople yard within the study area located in Wealden. According to the National Showman's Guild and the Association of Circus Proprietors of Great Britain this is the only known yard in the county.

S12. The 2011 Census only records data concerning Gypsies and Travellers (2021 Census not available until later in 2022). It recorded 815 Gypsies and Travellers residing in the study area representing around 0.15% of the usual resident population. This is above the average for England & Wales of 0.10%. The proportion of Gypsies and Travellers recorded in the study area for local authorities varied widely with only 0.07% of Eastbourne recorded as Gypsies and Travellers, 0.10% of Lewes, 0.15% of Rother, 0.17% of Hastings, and 0.25% of Wealden. Please note that 2011 Census data shows that there were 247 Gypsies and Travellers recorded in the SDNPA (including the section within East Sussex) although these are already included in the local authority figures. However, it is acknowledged that the Census figures may underestimate the Gypsy and Traveller population.

S13. The DLUHC July 2021 Count shows there were 128 Gypsy and Traveller caravans located in the study area including 56 caravans located on social rented pitches, 46 caravans on private pitches consisting of 40 pitches with permanent planning permission and 6 on a pitch with temporary planning permission, 16 unauthorised pitches on land owned by Gypsies and Travellers, and 8 unauthorised pitches on land not owned by Gypsies and Travellers.

S14. In relation to density, Hastings did not record any caravans as part of the DLUHC July 2021 Traveller Caravan Count, whilst Lewes recorded 2 caravans per 100,000 population and Eastbourne 6. In contrast, Rother recorded 36 caravans per 100,000 population and Wealden 52. This compares to 63 caravans per 100,000 population in the South East and 43 caravans per 100,000 population in England. As such, the figures are only used to help determine population trends rather than accommodation needs.

Unauthorised encampments

S15. During the period 2017/18 to the first half of 2020/21 (1 April 2017 to 30 September 2020), 137 unauthorised encampments took place in the study area. The number of unauthorised encampments peaked at 46 in 2018/19 before declining to 32 in 2019/20. Over a quarter (36 or 26%) of unauthorised encampments took place in Lewes, over a fifth (29 or 21%) in Wealden, and under a fifth in Hastings (25 or 18%), Rother (24 or 18%), and Eastbourne (17%). Over a third (37%) of households residing on unauthorised encampments in the study area between 2017/18 to 2020/21 had permanent accommodation elsewhere, whilst a similar proportion (36%) had no access to permanent accommodation.

S16. East Sussex County Council manages a 9-pitch transit site located close to the A27 trunk road just outside of Lewes. Analysis of data shows that between April 2017 and September 2020, on average, a third (33%) of the 9 pitches were occupied at any one time. The proportion of pitches occupied varied widely between the period April 2017 to September 2020. However, on average, the transit pitches were most likely to be occupied during the summer months, and less likely to be used during the winter months.

S17. Based on consultation with the Showmen's Guild, one Showpeople yard was identified in Wealden. It was not possible to consult with the household at the time of the consultation, but the yard was visited. Both local authority data and the site visit confirmed that it is occupied by a Travelling Showpeople family.

Stakeholder Consultation

S18. Consultations with a range of stakeholders (service providers) were conducted between January and March 2021 to provide in-depth qualitative information about the accommodation needs of Gypsies, Travellers and Travelling Showpeople. The aim of this section of the consultation was to obtain both an overall perspective on issues facing these groups, and an understanding of local issues that are specific to the study area. Due to Covid-19 restrictions, the consultation took the form of an online survey and telephone consultation.

S19. In recognition that Gypsies, Travellers, Travelling Showpeople and boat dweller issues transcend geographical boundaries and the duty to cooperate in addressing their accommodation needs, consultation was undertaken with officers from within the study area and from neighbouring authorities.

S20. According to stakeholders, the main driver of accommodation need was determined as new family formation which is putting pressure on existing provision. Also, there is evidence of Gypsy and Traveller households from elsewhere in the southeast purchasing land within the study area, and sometimes occupying the land, with the hope that this may lead to them gaining planning permission.

S21. A key barrier to delivering new provision cited by stakeholders was a lack of suitable, affordable land within the study area and beyond. It can be difficult to find appropriate land that is not being marketed for conventional housing. Whilst previous calls for suitable land had not been successful, it was suggested that a new call for sites could be undertaken. However, sites that do come forward can be highly constrained and there may be local opposition to new provisions.

S22. Stakeholders suggested that new sites should be in sustainable locations with access to services such as schools, health care and public transport. They did not specify any specific locations or preference for rural locations. However, it was acknowledged that suitable locations for expansion and growth, are constrained by the fact that significant proportions of East Sussex are protected by national landscape designations such as the High Weald Area of Outstanding Natural Beauty (AONB) and South Downs National Park, with other international biodiversity designations also constraining site development including the Ashdown Forest Special Area of Conservation (SAC)/Special Protection Area (SPA), Pevensey Levels SAC and Ramsar Site and Lewes Downs SAC.

S23. Stakeholders stated that there is good cooperation and communication between the different local authorities and agencies on Gypsy and Traveller issues within the county. There is particularly good communication and cooperation between the local authorities and the countywide Gypsy and Traveller Team which acts as a focal point for disseminating information. East Sussex has a cross-county Gypsy and Traveller Group which communicates well and liaises with relevant agencies. However, stakeholders suggest there is a need for better communication between the councils across the county and with Gypsy and Traveller representative bodies.

Accommodation need

S24. Accommodation need in the study area was assessed using the analysis of primary and secondary data. The accommodation needs calculation steps were based on a model in accordance with both previous (2007) and current Practice Guidance (including PPTS 2015) issued by Government. Although the 2007 guidance was withdrawn in 2016, it remains useful as a model to determine accommodation needs. It contains seven basic components; five assessing need and two assessing supply, which are applied to each sub-group, based on primary data.

S25. Table S1 below summarises accommodation need over the period 2021-40. The other tables (Tables S2 to S7) below summarise accommodation need for individual local authorities. It is important to note that the figures shown in Table S1 include all need as of July 2021, including any which may have been identified by previous GTAAs but remained unfulfilled by July 2021. The table shows the need for Gypsy and Traveller pitches (based on the ethnic identity definition), need for pitches (based on PPTS 2015), or need for pitches (based on a 'work' definition) over the period 2021-2040 in the study area. Local Plans should seek to meet the PPTS need (as required) with the difference between the PPTS and the 'ethnic' need (potential need) covered by a criteria-based policy, such as through a windfall policy, if the respective council is unable to do so through allocation for all need (including those who do and do not meet the PPTS definition). Please note that the periods in the tables below are based on financial years i.e. 1 April to 31 March.

Gypsies and Travellers Accommodation Need

Table S1: Summary of accommodation needs 2021-40 (pitches) (Study Area)

Period	Ethnic definition	PPTS 2015 definition	Work definition
Total 2021-26	51	12	5
Total 2026-31	16	13	11
Total 2031-36	18	16	14
Total 2036-40	18	14	13
Total 2021-40	103	55	43

Source: GTAA 2022

Table S2: Summary of accommodation needs 2021-40 (pitches) (Eastbourne)

Period	Ethnic definition	PPTS 2015 definition	Work definition
Total 2021-26	3	0	0
Total 2026-31	0	0	0
Total 2031-36	0	0	0
Total 2036-40	0	0	0
Total 2021-40	3	0	0

Source: GTAA 2022

S26. Eastbourne has no proposed land supply. As such, its identified accommodation need remains the same as above.

Table S3: Summary of accommodation needs 2021-40 (pitches) (Hastings)

Period	Ethnic definition	PPTS 2015 definition	Work definition
Total 2021-26	9	2	2
Total 2026-31	1	0	0
Total 2031-36	1	0	0
Total 2036-40	1	0	0
Total 2021-40	12	2	2

Source: GTAA 2022

S27. Hastings has a proposed a 2-pitch site in its land supply which if utilised to meet accommodation need would result in the following:

Table S4: Summary of accommodation needs 2021-40 (pitches) (Hastings)

Period	Ethnic definition	PPTS 2015 definition	Work definition
Total 2021-26	7	0	0
Total 2026-31	1	0	0
Total 2031-36	1	0	0
Total 2036-40	1	0	0
Total 2021-40	10	0	0

Source: GTAA 2022

Table S5: Summary of accommodation needs 2021-40 (pitches) (Lewes)

Period	Ethnic definition	PPTS 2015 definition	Work definition
Total 2021-26	3	0	0
Total 2026-31	1	1	1
Total 2031-36	1	1	1
Total 2036-40	1	1	1
Total 2021-40	6	3	3

Source: GTAA 2022

S28. Lewes has a proposed 5-pitch site in its land supply which if utilised to meet accommodation need would result in the following:

Table S6: Summary of accommodation needs 2021-40 (pitches) (Lewes)

Period	Ethnic definition	PPTS 2015 definition	Work definition
Total 2021-26	0	0	0
Total 2026-31	0	0	0
Total 2031-36	0	0	0
Total 2036-40	1	0	0
Total 2021-40	1	0	0

Source: GTAA 2022

Table S7: Summary of accommodation needs 2021-40 (pitches) (Rother)

Period	Ethnic definition	PPTS 2015 definition	Work definition
Total 2021-26	12	4	2
Total 2026-31	4	3	3
Total 2031-36	5	5	4
Total 2036-40	5	4	4
Total 2021-40	26	16	13

Source: GTAA 2022

S29. Rother has a proposed land supply of 4 pitches across two sites which if utilised to meet accommodation need would result in the following:

Table S8: Summary of accommodation needs 2021-40 (pitches) (Rother)

Period	Ethnic definition	PPTS 2015 definition	Work definition
Total 2021-26	8	0	0
Total 2026-31	4	3	1
Total 2031-36	5	5	4
Total 2036-40	5	4	4
Total 2021-40	22	12	9

Source: GTAA 2022

Table S9: Summary of accommodation needs 2021-40 (pitches) (SDNPA)

Period	Ethnic definition	PPTS 2015 definition	Work definition
Total 2021-26	2	0	0
Total 2026-31	1	1	1
Total 2031-36	1	1	1
Total 2036-40	1	1	1
Total 2021-40	5	3	3

Source: GTAA 2022

S30. SDNP has no proposed land supply to meet the accommodation needs of Gypsies and Travellers. As such, its identified accommodation need remains the same as above.

Table S10: Summary of accommodation needs 2021-40 (pitches) (Wealden)

Period	Ethnic definition	PPTS 2015 definition	Work definition
Total 2021-26	22	6	1
Total 2026-31	9	8	6
Total 2031-36	10	9	8
Total 2036-40	10	9	7
Total 2021-40	51	32	22

Source: GTAA 2022

S31. Wealden currently has no proposed land supply. The Council will consider new sites and extensions to existing sites as part of its new Local Plan process. As such, its identified accommodation need remains the same as above.

Travelling Showpeople Accommodation Need

Table S11: Summary of accommodation needs 2021-40 (plots) Study Area (in Wealden)

Period	Need
Total 2021-26	0
Total 2026-31	1
Total 2031-36	1
Total 2036-40	1
Total 2021-40	3

Source: GTAA 2022

Boat Dwellers Accommodation Need

S32. There is a lack of navigable waterways within the study area and few suitable locations for moorings. Consultation with stakeholders suggests that there is accommodation need for boat dwellers residing in the study area. However, a lack of evidence means that it is difficult to quantify the need. As such, the GTAA recommends that accommodation need for boat dwellers is met as it arises and considered on a case-by-case basis.

Transit Provision

S33. In relation to transit provision, the GTAA recommends that in addition to the existing transit site that is used by all authorities, the adoption of a negotiated stopping policy which involves caravans being sited on suitable specific pieces of ground for an agreed and limited period of time and if required and possible, with the provision of limited services such as water, skips and portaloos.

Conclusions

S34. Local Plans should be developed with regard to the National Planning Policy Framework (NPPF) (July 2021), PPTS (2015), and the Equalities Act (2010). As such, in relation to Gypsies and Travellers, it is recommended within the study area, Local Plans should seek to meet the PPTS need (as required) with ‘ethnic’ need (potential need) covered by a criteria-based policy. This will not only demonstrate knowledge of the overall accommodation need of all Gypsies and Travellers, but will also demonstrate how the accommodation need for those who do not meet the PPTS definition are being addressed. The local authorities could work with the PPTS definition for Gypsies and Travellers, with the remaining need from the ethnic definition as a potential need. This means that the Local Plans should seek to meet the PPTS need (as required) with the difference between the PPTS and the ‘ethnic’ need (potential need) covered by a criteria-based policy, such as through a windfall policy, if the respective councils are unable to do so through allocation for all need (including

those who do and do not meet the PPTS definition). It is important to note that this only refers to Gypsies and Travellers and not Travelling Showpeople.

S35. As well as quantifying accommodation need, the study also makes recommendations on other key issues including:

Meeting accommodation needs:

- It is recommended that the study area councils consider how the land identified in the Local Authority Allocations Policy can best meet the identified accommodation needs, in relation to Gypsies, Travellers and Travelling Showpeople.
- In relation to Gypsies and Travellers it is also recommended that the study area councils work closely with the families to determine how their accommodation need can best be met.
- Also, for the local authorities to provide pre-planning application advice to households who have identified land to help determine if it is suitable to address accommodation need.
- In order to meet the accommodation needs of Travelling Showpeople it is also recommended that the Council works closely with the owners of the current yard.
- Accommodation need for boat dwellers is met as it arises and considered on a case-by-case basis.

Management:

- Local authority housing providers, and where possible registered providers, need to consider the type of housing allocated to Gypsies and Travellers residing in bricks and mortar in order to minimise the psychological aversion and feelings of isolation.
- The local planning authorities develop a holistic vision for their respective authority's work on Gypsies and Travellers and embed it in Community and Homelessness Strategies, Local Plans and planning and reporting obligations under the Equality Act 2010.
- Provide training and workshop sessions with local authority and service provider employees (and elected members) to help them further understand the key issues facing the Gypsy and Traveller, Travelling Showpeople and Boat dweller communities.
- Local housing authorities should ensure that Gypsy and Traveller categories are included on ethnic monitoring forms (if they are not already), to improve data on population numbers, particularly in housing.
- To consider alternative site funding mechanisms such as site acquisition funds; loans for private site provision through Community Development Financial Institutions; and joint ventures with members of the Gypsy and Traveller community.
- Implement corporate policy to provide negotiated stopping arrangements to address unauthorised encampments for set periods of time at agreed locations (either on a county wide basis or across the study area).
- For the local authorities keep more detailed records of unauthorised encampments e.g.

Planning policy:

- To liaise with owners of the sites and yards to determine how they could expand the number of pitches to meet the family's accommodation needs.
- To consider how the accommodation needs can be met by expanding existing provision and/or providing new sites.
- To consider alternative options for developing new sites, yards and moorings, such as sites developed on a cooperative basis, shared ownership, or small sites owned by a local authority, but rented to families for their own use.
- To consider safeguarding Gypsy, Traveller and Travelling Showpeople sites and yards with permanent planning permission for their current use unless it can be demonstrated that they are no longer needed to meet identified need.
- The population size and demographics of the Gypsy, Traveller, Travelling Showpeople and boat dweller communities can change rapidly. As such, their accommodation needs should be reviewed every 5 to 7 years.

1. Introduction

Study context

1.1 In November 2020, the East Sussex local authorities of Eastbourne Borough Council, Hastings Borough Council, Lewes District Council, Rother District Council and Wealden District Council, and the South Downs National Park Authority (SDNPA) commissioned *RRR Consultancy Ltd* to undertake a Gypsy and Traveller Accommodation Assessment (GTAA) for the period 2021-2040. The results will be used as an evidence base for policy development in housing and planning and supersede any previous GTAA (including any levels of accommodation needs calculated prior to this assessment) published for the East Sussex local planning authorities. The base date for the report is1st April 2021.

1.2 The requirement to assess the accommodation needs of Gypsies and Travellers, Travelling Showpeople, non-Gypsy and Traveller residential caravan dwellers, and boat dwellers is established through national guidance contained in Planning Policy for Traveller Sites (DCLG, 2015). This report focusses on the assessment of accommodation need for Gypsies and Travellers, Travelling Showpeople and boat dwellers.

Methodological context

1.3 To achieve the study aims, the research drew on a number of data sources including:

- Review of secondary information: a review of national and local planning policies and recently undertaken GTAAs, and analysis of secondary data. This included analysis of the most recently published (January 2020) Ministry of Housing, Communities and Local Government (MHCLG) Traveller Caravan Count to determine trends in the population of Gypsies and Travellers, Travelling Showpeople and Boat Dwellers (due to Covid-19, no counts took place in July 2020 or January 2021), unauthorised encampment data, enforcement data and approved and refused planning permissions.
- An online survey, and interviews with key stakeholders providing qualitative data regarding the accommodation needs of all four community groups.
- Extensive surveys of Gypsies and Travellers, covering a range of issues related to accommodation and service needs.
- Consultation with marinas and other related boat-dweller groups in order to identify boat-dweller need (remotely due to Covid-19 restrictions).

1.4 The above provided an extensive range of quantitative and qualitative data, enabling a robust and reliable assessment of accommodation needs. The consultation was undertaken in a Covid-19 safe manner (i.e. it followed government guidance and

restrictions). However, this meant that the consultation with households was delayed and some consultation was undertaken using remote methods (e.g. over the telephone).

GTAA study area

1.5 A map of the study area is shown below:

Figure 1.1 Study area local authorities

Source: Rother District Council 2021

1.6 The following provides a description of the spatial characteristics of the constituent GTAA planning authorities.

Eastbourne

1.7 Eastbourne is a tourist resort on the Sussex coast, located approximately halfway between Brighton and Hastings. Eastbourne Borough has a population of 103,324 and covers approximately 4,550 hectares.

1.8 Over 40% of the Borough is within the South Downs National Park, which is located to the west of the town. The English Channel bounds the south of the Borough, with Wealden District entirely enveloping the Borough, particularly to the north where the northern urban area of Eastbourne is contiguous with Willingdon, Polegate and Stone

Cross in Wealden District. The Eastbourne and south Wealden areas have many functional links such as access employment, retail, leisure and education, whilst the area also shares environmental characteristics such as flood catchment and green infrastructure.

1.9 Much of the central and eastern areas of Eastbourne are constrained by flood risk, with the area in the centre of the town, known as Eastbourne Park, acting as a functional floodplain and flood water storage area. The East Langney Levels to the east of the town also acts as functional floodplain and is linked to the Pevensey Levels SAC and Ramsar site.

1.10 Eastbourne is served by the A27, which links the town to Brighton in the west, and the A259, which links the town with Bexhill and Hastings in the east. The A22 provides links with Uckfield and London. All of these roads are, for the most part single-carriageway and consequently journey times are longer than might be expected. The town is served by rail, with half-hourly services to London Victoria. Other direct rail services connect the town with Brighton, Hastings and Ashford International (where there is an interchange facility for rail services to continental Europe).

1.11 Many of Eastbourne's 5 million visitor per year area attracted by the town's location at the eastern gateway to the South Downs National Park, extensive views along the 7km coastline towards the iconic cliff at Beachy Head and the high-quality appearance and distinctive character of the elegant seafront façade. Over recent years, the cultural, leisure and tourism offer has received careful and effective enhancement through significant investment at the Devonshire Park Conference and Tennis centre to ensure that the town continues to compete as a premier seaside destination in the UK.

Hastings

1.12 Hastings is located on the Sussex south coast and is home to around 94,500 people. The borough has 8 miles of coastline and is surrounded by the mainly rural district of Rother. In the north, the mainly built-up area is close to the administrative boundary with Rother. To the south is the English Channel and 8 miles of coastline. The tightly drawn administrative boundary coupled with important environmental assets of the High Weald Area of Outstanding Natural Beauty (AONB) in the north, Hastings Country Park in the east and Combe Haven Valley to the west limits outward growth. Other environmental designations across the town, further limit the scale and location of new development.

1.13 The A21 from London connects with the A259 in central Hastings. The A259 is the main east-west road which runs along the coast. The recently completed Combe Valley Way (A2690), is a single-carriageway road which links the outskirts of Bexhill and Hastings. The route is designed to ease congestion on the A259 by providing a second main road link between the two towns and a more direct east-west linking employment

locations along this corridor (from the A27 to the A28 via the A259). The town is served by four railway stations and rail services run along the coast to Brighton in the west and Ashford to the east. There is a choice of service routes into London. Including London Charing Cross/Cannon Street, services to Victoria and, with High Speed One, St Pancras via Ashford. However, although the choice of rail routes is good, slow road and rail journey times to other parts of the region making commuting to other employment centres difficult.

Lewes

1.14 Lewes District covers an area of 292 sq. km, extending from the English Channel coast through the South Downs and into the countryside of the Sussex Weald to the north. The area through the centre of the district, equating to around half of the entire District's area and including the town of Lewes, is within the South Downs National Park. Lewes District has a population of 103,525, of which it is estimated that approximately 79,000 (around 75%) is located outside of the National Park.

1.15 The district benefits from good access to the trunk road network, with the A27/A26 linking the coastal towns to neighbouring Brighton and Eastbourne and the nearby A23/M23 providing access to London, Gatwick and the M25. The area is served by a number of key A roads, including the A259, which links the coastal communities, and the A26, A272 and A275, which are key routes through the northern part of the district. Newhaven and Seaford are linked by rail connections to London and Gatwick and towns along the Sussex coast and beyond. The port of Newhaven provides cross channel passenger and freight services to Dieppe in France.

1.16 The coastal towns are tightly enclosed by the National Park and comprise of a coastal environment characterised by chalk cliffs and shingle beaches with significant parts of Seaford and Newhaven constrained by risk of flooding from the River Ouse or inundation from the sea. The area of the district to the north of the National Park differs and is typified by a gently undulating low weald landscape, abundant woodland and river valleys, interspersed by small rural villages. The city of Brighton & Hove to the southwest exerts a strong influence on the district, as do the towns of Haywards Heath and Burgess Hill in Mid Sussex, albeit to a lesser extent.

1.17 The high-quality natural environment provides a constraint to development and is emphasised by the high level of environmental protection in parts of the district, including the National Park, sixteen Sites of Special Scientific Interest, two Special Areas of Conservation, two National Nature Reserves, four Local Nature Reserves, three Wildlife Trust Reserves and 115 Local Wildlife Sites.

Rother

1.18 Rother district has a population of 96,7001 and covers 200 square miles in the eastern part of East Sussex. It is a predominantly rural district with three main settlements: Bexhill, Battle and Rye, although nearby Hastings is the centre of the 'travel to work area' for much of Rother district and there are significant movements between Rother and Hastings. There is a high proportion of elderly people in the district, and a higher proportion of people with long-term health problems or disabilities than the County average.

1.19 Strategic accessibility within the district is relatively poor, particularly in terms of journey times to London and access to regional centres such as Gatwick, Ashford and Brighton. The main strategic road network consists of the A27/A259 corridor along the south coast and the A21 linking Hastings and the eastern part of Rother district to London and beyond. Both corridors experience heavy volumes of traffic during peak times and this can make journey times slow and unreliable. Access to services in rural parts of the District is particularly constrained whilst public transport services are generally limited.

1.20 Large parts of Rother district are subject to environmental designations and constraints, which influence the location, scale and acceptability of new development. Some 83% of the District is within the High Weald Area of Outstanding Natural Beauty (AONB), and other areas, especially in the east, are at risk of flooding. There are also nationally and internationally protected areas including Ramsar sites and Sites of Special Scientific Interest, and also areas of ancient woodland (covering some 16% of the District), and Priority Habitats.

South Downs National Park

1.21 The South Downs National Park was designated on 31 March 2010. The National Park has a population of about 112,000, and approximately 2 million people live within 5 kilometres of its boundary. The National Park contains five broad areas – Western Downs, the Western Weald, the Scarp Slope, the Dip Slope and the Coastal Plain – and four river corridors. The four river corridors all flow north to south bisecting the National Park. There are several other important rivers in the National Park such as the Itchen, Meon and Rother whose whole catchment area lies within the National Park. Four of the National Park's five main settlements are located in the Western Weald – Petersfield, Liss, Midhurst and Petworth. These settlements serve a wide rural hinterland.

1.22 The South Downs National Park (SDNP) in East Sussex covers parts of Lewes District, Wealden District, and Eastbourne Borough. Within the East Sussex part of the National

[1] Source: Mid-2020 Population Estimates (MYE), Office for National Statistics, from East Sussex in Figures

Park sits Lewes, a historic county town, 7 miles from Brighton. It is one of the largest settlements within the SDNP, along with Petersfield in East Hampshire. The town is rich in cultural history, as it used to serve as an active port for iron, brewing and shipbuilding. The made Lewes Neighbourhood Plan quotes that the independence, geography, creativity and built heritage is what makes Lewes special. There are also several smaller settlements such as Kingston near Lewes, Alfriston, Ditchling and East Dean. This part of the National Park is very open and sensitive in terms of landscape, with different character types that can be seen in the 2020 SDNPA Landscape Character Assessment.[2]

Wealden

1.23 Wealden District is the largest local authority in the County of East Sussex, covering some 322 square miles. It is a predominately rural district and has a population of over 162,000. The District has five main settlements that includes Crowborough, Heathfield, Uckfield, Hailsham and Polegate, as well as a high number of smaller villages that are scattered across the District. In 2011, just over 50% of the population lived within the five main settlements of Wealden District, with remainder of the population living in rural settlements and the countryside. The housing market and the economy within the District are heavily influenced by larger settlements that lie on the administrative boundary of the District, namely Royal Tunbridge Wells (to the north) and Eastbourne (to the south).

1.24 Although situated within the South East of England, the District is generally not well connected with London, nearby towns, and cities or other areas of employment. There is a heavy reliance upon cars as accessibility by public transport is poor. The main strategic road route is the A22/A26 that connects Eastbourne with both East Grinstead and Royal Tunbridge Wells respectively. In addition, the A27 corridor is situated in the southern part of the District and connects the towns/cities of Hastings, Bexhill, Eastbourne, Lewes and Brighton and Hove. Both strategic road networks are predominantly single carriageway in Wealden and experience heavy volumes of traffic at peak times and are generally make journey times slow. Rail connections to London are also slow, particularly in the south of the District which relies upon connections to the Brighton Mainline.

1.25 Wealden District is a highly constrained authority with over 53% of the district being located within the High Weald Area of Outstanding Natural Beauty (AONB), predominantly in the northern part of the district. The district also contains part of the South Downs National Park (SDNP), with over 7% of the district falling within the National Park area. Thus together, the High Weald AONB and the SDNP cover some 60% of the District, in formal recognition of its landscape quality. The local authority

[2] https://www.southdowns.gov.uk/landscape-design-conservation/south-downs-landscape-character-assessment/south-downs-landscape-character-assessment-2020/

area also contains the Ashdown Forest Special Area of Conservation (SAC) and Special Protection Area (SPA) and the Pevensey Levels SAC and Ramsar site that are European / internationally designated biodiversity sites. Almost 10% of the district is covered by these sites alongside other Sites of Special Scientific Interest (SSSI).

The Purpose of the Assessment

1.26 Whilst the Housing and Planning Act 2016 removes the requirement for all local authorities to carry out a specific assessment, the accommodation needs of Gypsy and Traveller households are still required to be considered in housing needs assessments. Also, the August 2015 Planning Policy for Traveller Sites (PPTS) reiterates the need for local authorities to evidence the accommodation needs of Gypsies and Travellers and to determine the number, type and location of new provision.

1.27 The PPTS (2015) amended the definition of Gypsies and Travellers for planning purposes so that only the accommodation needs of households who have not permanently ceased to travel are assessed (see para. 2.4) (although this GTAA considers the accommodation needs of households who both meet and do not meet the PPTS 2015 definition). It requires local planning authorities to set pitch targets for Gypsies and Travellers, and plot targets for Travelling Showpeople, as defined in Annex 1 of the same document, to address the likely permanent and transit site accommodation needs of travellers in their area. The needs of residential caravan dwellers i.e. non-Gypsies and Travellers – will be informed by local housing need assessments.

1.28 The purpose of this assessment is to quantify the accommodation needs of Gypsies and Travellers in the study area between 2021 and 2040. This is in terms of permanent pitches, sites, and transit sites and/or negotiated stopping arrangements for Gypsies and Travellers. This report will form part of the evidence base for the Local Plans review work.

1.29 To achieve the study aims, this report focusses on the assessment of accommodation need for Gypsies and Travellers, Travelling Showpeople and boat dwellers provision or need in the area. The assessment of accommodation need for residential caravan dwellers who are not Gypsies and Travellers are considered in local housing needs assessments. This research provides a range of quantitative and qualitative data enabling a robust and reliable assessment of accommodation needs.

2. Policy context

Introduction

2.1 To assess the current policy context, existing documents have been examined to determine what reference is made to Gypsy, Traveller, Travelling Showpeople, and boat dweller issues.

2.2 The intention is to summarise key national and local policies and to examine the findings of GTAAs recently undertaken by neighbouring authorities. Furthermore, understanding the current policy position will be important in the development of future strategies intended to meet accommodation needs and housing related support needs among Gypsies, Travellers, Travelling Showpeople and boat-dwellers.

National Policies

Planning Policy for Traveller Sites (PPTS) (August 2015)

2.3 In August 2015, the Government published its amended Planning Policy for Traveller Sites (PPTS) document, which replaced the previous guidance and circulars relating to Gypsies, Travellers and Travelling Showpeople. The guidance emphasised the need for local authorities to use evidence to plan positively and manage development. The PPTS requires local authorities to work with neighbouring local authorities to determine transit and permanent pitch and plot targets. It states that in assembling the evidence base necessary to support their planning approach, local authorities should:

- effectively engage with traveller communities;
- co-operate with traveller groups to prepare and maintain an up-to-date understanding of the likely permanent and transit/emergency accommodation needs of their areas; and
- use a robust evidence base to establish accommodation needs to inform the preparation of local plans and make planning decisions.

2.4 There are some key differences between the March 2012 and August 2015 versions of the PPTS. One important amendment relates to the change in the definitions of Gypsies, Travellers and Travelling Showpeople. The August 2015 PPTS changed the definition to exclude households who have permanently ceased to travel. The accommodation needs of such households still need to be considered but in separate calculations.

National Planning Policy Framework (NPPF)

2.5 According to NPPF (July 2021) along with related planning guidance a sound local plan seeks, as a minimum, to meet the area's objectively assessed needs (para. 11 b), and address "the needs of groups with specific housing requirements" (para. 60).

Humans Rights Act 1998 and the Equalities Act 2010

2.6 There is an expectation that whilst calculating the level of additional accommodation need for Gypsies and Travellers who meet the PPTS 2015 planning definition and identifying how that need will be met (i.e. additional land supply), that local authorities also need to identify the level of need and means by which they have considered and will address the additional accommodation needs of those who do not meet this definition. This related to all who are ethnically recognised as Gypsies and Travellers (in line with the Humans Rights Act 1998 and the Equalities Act 2010). Both the Human Rights Act 1998 and Equalities Act 2010 protect Gypsies and Travellers' cultural and ethnic way of life, including living in a caravan.

Definition Contexts

Gypsies and Travellers

2.7 The Government's amended definition of Gypsies and Travellers[3], is set out below:

> *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, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.*

In determining whether persons are "gypsies and travellers" for the purposes of this planning policy, consideration should be given to the following issues amongst other relevant matters:

a) whether they previously led a nomadic habit of life
b) the reasons for ceasing their nomadic habit of life
c) whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.

[3] DCLG, Planning Policy for Traveller Sites, August 2015.

Travelling Showpeople

2.8 Unlike Gypsies and Travellers, Travelling Showpeople are not considered to be an ethnic minority by the Equalities Act 2010 (and previously the Race Relations Act 1976). Although some Gypsies and Travellers may earn a living as 'travelling showpeople', Travelling Showpeople as a group do not consider themselves to belong to an ethnic minority[4].

2.9 The Government's definition of Travelling Showpeople is:

> *Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above[5].*

Boat Dwellers/bargees

2.10 The Housing and Planning Act 2016 requires Local Housing Authorities (LHAs) to consider the needs of people residing on places on inland waterways where houseboats can be moored. The term 'houseboat' is not defined by DCLG guidance. According to the HM Revenues and Customs:

> "A houseboat is defined for the purposes of VAT as being a floating decked structure which:
>
> - is designed or adapted for use solely as a place of permanent habitation
> - does not have the means of, and which is not capable of being readily adapted for, self-propulsion" (HMRC VAT Notice 701/20, December 2013).

2.11 It is important to note that the above definition refers to a type of boat dwelling rather than households who reside on boats. Also, there may be boat dwellers who are licensed to permanently reside on other types of boats. As such, this GTAA adopts the National Bargee Travellers Association's (NBTA) definition who define a boat dweller as:

> "Someone who lives aboard a vessel (which may or may not be capable of navigation), that the vessel is used as the main or only residence and where that vessel is either (i) moored in one location for

[4] DCLG, *Consultation on revised planning guidance in relation to Travelling Showpeople*, January 2007, p. 8

[5] DCLG, *Planning Policy for Traveller Sites,* August 2015.

more than 28 days in a year (but may occasionally or periodically leave its mooring); or (ii) has no permanent mooring and navigates in accordance with the statutes appropriate to the navigation such as inter alia s.17(3)(c)(ii) of the British Waterways Act 1995 or s.79 of the Thames Conservancy Act 1932".

Planning policy and case law

2.12 For the purposes of this planning policy, "Travellers" means "Gypsies and Travellers" and "Travelling Showpeople" as defined above from PPTS annex 1. Also, for the purposes of Gypsy and Traveller Accommodation Assessments (GTAAs), Travelling Showpeople are included under the definition of 'Gypsies and Travellers' in accordance with The Housing (Assessment of Accommodation Needs) (Meaning of Gypsies and Travellers) (England) Regulations 2006, and the draft guidance to local housing authorities on the periodical review of housing needs (March 2016). It recommends that Travelling Showpeople's own accommodation needs and requirements should be separately identified in the GTAA[6]. This GTAA adheres to the definition of Gypsies, Travellers and Travelling Showpeople as defined by the Government's 'Planning Policy for Traveller Sites' (August 2015) (see above).

2.13 It is important to note that Gypsies, Travellers and Travelling Showpeople have separate accommodation need requirements. Different terminology is used to distinguish between Gypsy and Traveller accommodation and Travelling Showpeople accommodation. Gypsies and Travellers occupy pitches on sites, while Travelling Showpeople occupy plots on yards. As well as space for residing quarters, Travelling Showpeople also require additional space in order to store and maintain large equipment.

2.14 Whilst it is clear that the 2015 PPTS excludes those who have ceased to travel permanently as being Gypsies and Travellers (for planning purposes), it does not explicitly state how the new definition should be interpreted in relation to other factors, such as whether families travel for economic or work purposes.

2.15 One interpretation is that 'a nomadic habit of life' means travelling for an economic purpose. Previous case law e.g. R v Shropshire CC ex p Bungay (1990) and Hearne v National Assembly for Wales (1999) has been used to support this point. There is nothing within the PPTS 2015, which indicates that Gypsy or Traveller status (for planning purposes) is solely derived from whether there is any employment-related travelling.

[6] DCLG, *Planning Policy for Traveller Sites*, August 2015 and DCLG, *Draft Guidance to local housing authorities on the periodical review of housing needs (Caravans and Houseboats*) March 2016.

2.16 More recent Planning Inspectors' reports have reached differing conclusions regarding whether the Gypsy and Traveller status (for planning purposes) should be based on patterns of employment-related nomadism. For example, a 2016 planning appeal decision regarding a site at Throcking, Hertfordshire, concluded that the appellant was not a Gypsy and Traveller for planning purposes as there was insufficient evidence "that he is currently a person of a nomadic habit of life[7]" for employment purposes (i.e. he did not meet the August 2015 PPTS definition).

2.17 In contrast, some other Planning Inspectors' reports have appeared to give less weight to the travelling status of Gypsies and Travellers. For example, an appeal decision regarding a site in Blythburgh, Suffolk, states that whilst the appellant had permanently ceased to travel, he is nonetheless an ethnic Romany gypsy with protected characteristics under the Equality Act 2010[8] (i.e. travelling status is not the only factor Planning Inspectors use to determine the ethnic status of Gypsies and Travellers).

2.18 Similarly, a local authority refused a planning application as it determined that the household did not meet the PPTS 2015 definition. However, despite evidence that the family had reduced the extent to which they travel due to educational requirements, the Planning Inspector allowed the s78 appeal on the basis that they should be regarded as Gypsies for planning purposes[9]. Also, in deciding whether to allow a S78 appeal for a site in West Kingsdown, Kent, the Planning Inspector acknowledged that the local authority included within its future calculations the accommodation needs (in terms of pitches) of 'cultural' Gypsies and Travellers[10].

2.19 Importantly, much of the case law precedes the August 2015 definition. For example, the commonly cited R v South Hams DC ex parte Gibb et al judicial decision which determined that 'a nomadic habit of life' means travelling for an economic purpose was undertaken in response to the now partly repealed Caravan Sites Act 1968. It is believed that there has not yet been any case law in relation to the updated definition. Also, it is increasingly recognised that defining Gypsies and Travellers in terms of employment status may contravene human rights legislation. For example, in 2003 the Welsh Assembly's Equality of Opportunity Committee noted the:

> '…apparent obsession with finding ways to prove that an individual is not a 'Gypsy' for the purposes of the planning system. This approach is

[7] Appeal Ref: APP/J1915/W/16/3145267 Elmfield Stables, Thirty Acre Farm, Broadfield, Throcking, Hertfordshire SG9 9RD, 6 December 2016.

[8] Appeal Ref: APP/J3530/A/14/2225118, Pine Lodge, Hazels Lane, Hinton, Blythburgh, Suffolk IP17 3RF 1 March 2016.

[9] Appeal Ref: APP/U2235/W/18/3198435 Ten Acre Farm, Love Lane, Headcorn TN27 9HL 9 May 2019.

[10] Appeal Ref: APP/G2245/W/17/3170535 Land north-west of Eagles Farm, Crowhurst Lane, West Kingsdown, Kent
TN15 6JE 27 November 2018.

extremely unhelpful…and there can be no doubt that actual mobility at any given time is a poor indicator as to whether someone should be considered a Gypsy or a Traveller[11]'.

2.20 In September 2019, the Equality and Human Rights Commission published research into the impact of the PPTS 2015 definition on assessing accommodation needs[12]. The research examined a sample of 20 GTAAs undertaken since the August 2015 revised definition. The report found that there had been a 73% reduction in accommodation need in post-2015 GTAAs compared to pre-2015 GTAAs undertaken by the same local planning authorities.

2.21 Given the above, for the purpose of calculating accommodation need, our approach is to use a methodology which provides first, an accommodation need figure based on ethnic identity; second, a figure based on the PPTS (August 2015) and a third which related to the work interpretation (where accommodation need only takes account of those who travel in a caravan for work purposes). Different GTAAs reach differing conclusions on which approach / definition to adopt and it is for local authorities to decide individually which approach to take for planning purposes (i.e. for the purpose of its local plan and for its planning approval process). It is recommended that this be kept under review in the light of evolving appeal decisions and case law. Considering that there is no agreed interpretation of PPTS 2015, and the 'travel to work' interpretation may lead to an underestimation of need, this GTAA recommends the adoption of the PPTS figure and for the difference between the PPTS and ethnic based need to be covered by a criteria-based policy. The 'travel to work' interpretation of need should be used as a form of reference and comparison with other authorities who use this approach.

Review of housing needs for caravans and houseboats: draft guidance (DCLG, March 2016)[13]

2.22 The 2016 DCLG draft guidance to local housing authorities on the periodical review of housing needs for caravans and houseboats states that when considering the need for caravans and houseboats, local authorities should include the needs of a variety of residents in differing circumstances, for example:

- Caravan and houseboat dwelling households:
  - who have no authorised site anywhere on which to reside;

[11] Welsh Assembly 2003 cited in Johnson, Murdoch and Willers, The Law Relating to Gypsies and Travellers, no date).

[12] Equality and Human Rights Commission, Gypsy and Traveller sites: the revised planning definition's impact on assessing accommodation needs, Research Report 128, September 2019 located at: https://www.equalityhumanrights.com/sites/default/files/190909_gypsy_and_traveller_sites_-_impact_of_the_revised_definition_-_final.pdf

[13] See https://www.gov.uk/government/publications/review-of-housing-needs-for-caravans-and-houseboats-draft-guidance

- whose existing site accommodation is overcrowded[14] or unsuitable, but who are unable to obtain larger or more suitable accommodation;
- who contain suppressed households who are unable to set up separate family units; and
- who are unable to access a place on an authorised site, or obtain or afford land to develop on.

- Bricks and mortar dwelling households:
  - Whose existing accommodation is overcrowded or unsuitable ('unsuitable' in this context can include unsuitability by virtue of a person's cultural preference not to live in bricks-and-mortar accommodation).

2.23 Importantly, in respect of this report, the draft guidance states that assessments should include, but are not limited to, Romany Gypsies, English, Irish, Welsh and Scottish Travellers, New Travellers, and Travelling Showpeople.

2.24 The guidance recognises that the needs of those residing in caravans and houseboats may differ from the rest of the population because of:

- their nomadic or semi-nomadic pattern of life;
- their preference for caravan and houseboat-dwelling;
- movement between bricks-and-mortar housing and caravans or houseboats; and
- their presence on unauthorised encampments or developments.

2.25 Also, it suggests that as mobility between areas may have implications for carrying out an assessment, local authorities should consider:

- co-operating across boundaries both in carrying out assessments and delivering solutions;
- the timing of the accommodation needs assessment; and
- different data sources.

2.26 Finally, the DCLG draft guidance (2016) states that in relation to Travelling Showpeople, account should be taken of the need for storage and maintenance of equipment as well as accommodation, and that the transient nature of many Travelling Showpeople should be considered.

[14] Overcrowding e.g. where family numbers have grown to the extent that there is now insufficient space for the family within its caravan accommodation and insufficient space on the pitch or site for a further caravan (DCLG 2007 p.25)

2.27 Whilst the guidance has been in draft form for over 5 years it remains important to acknowledge its underlying principles (i.e. that an understanding of the need for caravan sites and moorings for houseboats is essential to make properly planned provision and avoid the problems associated with ad-hoc or unauthorised provision).

Housing and Planning Act 2016

2.28 The Housing and Planning Act, which gained Royal Assent on 12 May 2016, omits sections 225 and 226 of the Housing Act 2004, which previously identified 'gypsies and travellers' as requiring specific assessment for their accommodation needs when carrying out reviews of housing needs. Instead, the Act amends section 8 of the Housing Act 1985 governing the assessment of accommodation needs to include all people residing in or resorting to the study area in caravans or houseboats. However, for planning purposes, the PPTS (August 2015) still requires local authorities to identify the accommodation needs of Gypsies, Travellers and Travelling Showpeople who accord with the definition in Annex 1 of the PPTS.

Local Planning Policies

2.29 The following section summarises the planning policies of the GTAA constituent local authorities in relation to Gypsies, Travellers and Travelling Showpeople. Each authority is at a different stage in the progression of their Local Plans, although 5 out of the 6 authorities are currently undertaking an update of their Local Plan. The current position for each authority is as follows:

Eastbourne Borough Council

2.30 Eastbourne Borough Council adopted its Core Strategy in February 2013. The local authority is currently undertaking a 5-year update of the Local Plan to cover the period 2019-2039. Consultation on the issues and options was carried out between November 2019 and January 2020. Policy D6 (Gypsies, Travellers and Travelling Showpeople) is a criteria-based policy to assess the suitability of sites should a need arise requiring future site allocations to made:

> "In order to meet identified need for Gypsies, Travellers and Travelling Showpeople for the plan period, the Council will work with neighbouring local planning authorities on the provision of sites. If this process fails to identify sufficient sites by 2015, a Gypsy and Traveller Site Allocations Local Plan will be prepared to address the deficit.
>
> The following criteria will be used to assess the suitability of sites and will also be used to assess planning applications or proposals for Gypsies, Travellers and Travelling Showpeople:
>
> - the impact on landscape character and/or sites of nature conservation interest, and scope for mitigation;

- the topography of the site and impact on visual amenity as well as the risk of flooding;
- the location of the site in relation to the highway network and the potential impact on traffic movement and trip generation on local roads;
- safe and convenient access to local services and facilities such as schools, shops and health services, and the availability of utility services; and
- adequate provision can be made for on site parking, storage, play areas and landscaping screening in order to protect the amenities of adjacent occupiers; and
- the impact on the residential amenity of the settled community".

Eastbourne Core Strategy (2014 p.87)

Hastings Borough Council

2.31 Hastings Borough Council adopted its Planning Strategy in 2014 and Development Management Plan in 2015. Hastings is currently in the process of updating the Local Plan for period 2019 - 2039 and Regulation 18 consultation ended 24 March 2021. The Development Management Plan 2015 contains policies FB10, which allocates 2 permanent pitches which accommodates local need set out in the 2015 paper. Policy H5 ('Accommodation for Travelling Communities') of the Local Plan sets out criteria for the suitability of sites:

> "In assessing the suitability of sites for allocation for permanent residential sites for Gypsies and Travellers, and for the purposes of considering planning applications for sites for Gypsies, Travellers and Travelling Showpeople, proposals will be supported where the following criteria are met, the site should:
>
> a) respect areas of high conservation or ecological value
> b) be acceptable in respect of vehicular access and parking
> c) achieve a reasonable level of visual and acoustic privacy for both people living on the site and for those living nearby
> d) avoid locations where there is a risk of flooding
>
> In the case of sites for Travelling Showpeople, site suitability assessment will also take account of the nature and scale of the Showpeople's business in terms of the land required for storage and/or the exercising of animals".
>
> (Hastings Borough Council Local Plan 2014 p.77)

Lewes District Council

2.32 Core Policy 3 'Gypsy and Traveller Accommodation' of the Lewes District Core Strategy (May 2016) states that proposals for sites for Gypsies and Travellers and Travelling Showpeople will be supported where the following criteria have been met and they are in conformity with other relevant district wide policies:

1. Avoid locating sites in areas at high risk of flooding or significantly contaminated land, or adjacent to existing uses incompatible with residential uses, such as waste tips and wastewater facilities
2. The site is well related to, or has reasonable access to settlements with existing services and facilities such as schools, health services and shops
3. The proposal does not compromise the special features of national historical, environmental or landscape designations such as the South Downs National Park, Lewes Downs and Castle Hill Special Areas of Conservation (SAC) and Sites of Special Scientific Interest (SSSI)
4. There is safe and convenient vehicular access to the road network
5. There is capacity to provide appropriate on-site physical and social infrastructure such as water, power, drainage, parking and amenity space; and
6. Adequate levels of privacy for residents on and adjacent to the site are provided through planning considerations such as site layout, scale and landscaping.

2.33 It further states that proposals for sites for Travelling Showpeople should also include adequate space for storage and/or keeping and exercising any animals associated with Travelling Showpeople's needs.

(Lewes Core Strategy 2010-2030 Part 1 2016 p.92)

2.34 Policy GT01 of the Lewes Core Strategy 2010-2030 Part 2 (2020) allocates a 0.69ha site for the development of 5 net additional permanent Gypsy and Traveller pitches, subject to compliance with all appropriate development plan policies and the following criteria:

a) Access, including provision for pedestrians and cyclists, to be provided from Station Road, including provision of a dedicated pedestrian path connecting the entrance of the site to the nearest bus stop serving the site;
b) The site should be levelled and laid out to provide sufficient room to allow for vehicles to turn around within the site;
c) Development should use the natural topography in screening the site from wider, sensitive landscape views and designed to minimise the perception of urbanisation in this location, particularly with regards to hardstanding and amenity buildings;
d) Development is subject to an appropriate assessment and evaluation of archaeological potential and mitigation measures implemented accordingly;

e) An ecological impact assessment is undertaken and appropriate measures identified and implemented accordingly to mitigate potential adverse impacts on biodiversity. Development allows for the protection of biodiversity and enhancement where possible;
f) Appropriate flood risk assessment and surface water drainage strategy and mitigation is agreed with the appropriate body and implemented accordingly;
g) The development should be occupied by only those that fulfil the definition of a Gypsy or Traveller
h) The development will provide connection to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water; if non-mains drainage, an environmental permit will be required.

(Lewes Core Strategy 2010-2030 Part 2 2020 p.56)

Rother District Council

2.35 The District Council adopted its Local Plan Core Strategy in September 2014 and its Development and Site Allocations (DSA) Local Plan in December 2019. The local authority is currently in the process of carrying out a 5-year update as required by the plan making regulations. The timeframe for the new Local Plan will run from 2019-2039 and a Regulation 18 consultation is tentatively planned for early 2023. The Core Strategy contains policies LHN5 ('Sites for the Needs of Gypsies and Travellers') which sets out the overall target for permanent pitches within the District:

> "Provision will be made for 5 permanent pitches within Rother for Gypsies and Travellers over the period 2011-2016, and a further 6 pitches between 2016 and 2028.
>
> Sites will be allocated in the Development and Site Allocations Plan, taking into account any sites granted permission in the interim.
>
> Site selection will take into account the Strategy objectives, the future needs of occupiers and the likely availability of sites for its intended occupiers. Sites should meet the criteria set in Policy LHN6".
>
> (Rother District Council Local Plan 2014 p.131)

– and policy LHN6 ('Gypsies, Travellers and Travelling Showpeople Criteria) which sets out criteria for assessing the suitability of sites:

i. "The site is not located in a nature conservation designated area, in an area at risk from flooding (flood zones 3a & 3b or a functional floodplain), in close proximity to a Source Protection Zone or significantly contaminated land;

ii. The site should not result in an unacceptable visual or landscape impact, especially in the High Weald AONB taking account of proposed landscaping or screening;
iii. The site is located within or close to an existing settlement and is accessible to local services by foot, by cycle or by public transport;
iv. The site can be adequately accessed by vehicles towing caravans and provides adequate provision for parking, turning, and access for emergency vehicles;
v. The site is not disproportionate in scale to the existing settlement;
vi. Mixed use sites should not unreasonably harm the amenity of adjoining properties; and
vii. In the case of sites for Travelling Showpeople, the site must also be suitable for the storage of large items of mobile equipment".

(Rother District Council Local Plan 2014 p.132)

2.36 Policy LHN6 further states that where planning permission is granted, appropriate conditions or planning obligations will be imposed to ensure occupation of the site is restricted to those persons genuinely falling into the definition of Gypsies, Travellers and Travelling Showpeople.

2.37 Rother's Development and Site Allocations (DSA) Local Plan contains policy BEX3c which allocates 5 pitches to land east of Watermill Lane, and policy GYP1 which allocates 1 pitch adjacent to High Views, Loose Farm Lane, Battle.

South Downs National Park Authority (SDNPA)

2.38 The Park Authority adopted its Local Plan (SDLP) in July 2019. The SDLP covers the period 2014-2033. The Local Plan is landscape led, with strategic policies covering the whole of the South Downs National Park including for Gypsies, Travellers and Travelling Showpeople. The SDLP Policy SD33 ('Gypsies, Travellers and Travelling Showpeople') seeks to safeguard and provide permanent pitches:

1. "Lawful permanent sites for Gypsies, Travellers and Travelling Showpeople will be safeguarded from alternative development, unless acceptable replacement accommodation can be provided or the site is no longer required to meet any identified need.

2. The National Park Authority will seek to meet the need of Gypsies, Travellers and Travelling Showpeople, by the allocation of permanent pitches and the granting of planning permission on currently unidentified sites for approximately:

   a) 13 pitches in that part of the National Park located in Brighton & Hove

b) 6 pitches in that part of the National Park located in Lewes District including 5 pitches allocated within the South Downs Local Plan – policies SD75 Pump House in Kingston, and SD83 Offham Barns.
c) 6 pitches in that part of the National Park located in East Hampshire District

3. Development proposals to meet the needs of the Gypsy, Traveller and Travelling Showpeople community (as defined in Planning Policy for Traveller Sites (2015) or any subsequent policy) on unidentified sites will be permitted where they:

   a) Meet a need as identified in Figure 7.4 of the Local Plan
   b) Do not result in sites being over-concentrated in any one location or disproportionate in size to nearby communities
   c) Are capable of being provided with infrastructure such as power, water supply, foul water drainage and recycling/waste management without harm to the special qualities of the National Park
   d) Provide sufficient amenity space for residents
   e) Do not cause, and are not subject to, unacceptable harm to the amenities of neighbouring uses and occupiers
   f) Have a safe vehicular and pedestrian access from the public highway and adequate provision for parking, turning and safe manoeuvring of vehicles within the site; and
   g) Restrict any permanent built structures in rural locations to essential facilities.

4. Proposals for sites accommodating Travelling Showpeople should allow for a mixed use yard with areas for the storage and maintenance of equipment".

   (South Downs National Park Authority Local Plan 2019 p.125)

Wealden District Council

2.39 The local authority adopted its Core Strategy Local Plan in February 2013. Wealden District Council are currently in the process of preparing a new Local Plan to cover the period 2019 – 2039. A Local Development Scheme (LDS) for the preparation of the new Local Plan was published in July 2020. The Council has since consulted on the Wealden Local Plan – Direction of Travel document between November 2020 and January 2021 and will undertake a further statutory Regulation 18 consultation in the Spring of 2022.

2.40 The Core Strategy Local Plan policy WCS11 ('The Travelling Community – Provision for Gypsies, Travellers and Travelling Showpeople: Site Criteria') states that proposals for Gypsy and Traveller sites will be supported where the following criteria are met:

- "Well related to existing settlements with local services and facilities. Sites should either be within or close to such settlements or close to major roads and/or public transport thus affording good access to local services;
- Have safe and convenient vehicular access, be suitable in terms of topography and be in a location where the necessary infrastructure already exists or can reasonably be provided;
- Be able to achieve a reasonable level of visual and acoustic privacy for both people living on the site and for those living nearby. The site will provide an acceptable level of amenity for the proposed residents and will not have an unacceptable level of impact on the residential amenity of neighbouring dwellings;
- Not compromise the essential features of nationally designated areas of landscape, historical or nature conservation protection, including the South Downs National Park and High Weald Area of Outstanding Natural Beauty. Ashdown Forest Special Area of Conservation and Special Protection Area, and the Pevensey Levels Ramsar site should be avoided as potential locations; and
- Avoid locations where there is a risk of flooding, or which are adjacent to incompatible uses such as a refuse tip, sewage treatment works or significantly contaminated land".

(Wealden Core Strategy Local Plan 2013 p.63)

2.41 Policy WCS11 also states that in relation to Travelling Showpeople, proposals will be assessed upon the basis of established need. Site suitability assessment will also take account of the nature and scale of the Showpeople's business in terms of the land required for storage and/or the exercising of animals.

Duty to cooperate and cross-border issues

2.42 The duty to cooperate was created in the Localism Act 2011. It places a legal duty on local planning authorities, county councils in England, and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation relating to strategic cross boundary matters. Also, the need for

councils to cooperate reflects the way that Gypsy and Traveller travelling patterns transcend local authority borders[15].

2.43 Local authorities are required to work together to prepare and maintain an up-to-date understanding of the likely permanent and transit accommodation needs for their areas. They should also consider the production of joint development plans to provide more flexibility in identifying sites, particularly if a local planning authority has specific development constraints across its area.

2.44 As part of this assessment, consultation in relation to Gypsies, Travellers and Travelling Showpeople was undertaken with adjoining planning and housing authorities. The findings from the consultation are discussed in detail in Chapter 4.

2.45 Given the transient nature of Gypsies and Travellers, it is important for the GTAA to consider Gypsy and Traveller accommodation need in neighbouring authorities. The following section summarises the results of GTAAs recently undertaken by both the East Sussex local authorities (which have commissioned this assessment) and neighbouring or nearby local authorities specifically in relation to accommodation need and travelling patterns.

East Sussex and South Downs National Park Authority GTAA 2015 (Pre PPTS definition)

2.46 The GTAA assessed the permanent accommodation needs of Gypsies, Travellers and Showpeople in relation to the East Sussex planning authorities and the South Downs National Park (SDNP) planning authority area within East Sussex, excluding Rother District Council which had carried out its own assessment (Rother Background Paper, 2011). It also assessed transit needs across the whole county (including Rother). The GTAA identified a need of 55 additional Gypsy and Traveller pitches for the period 2013/14 to 2027/28 including 42 pitches in Wealden, 8 in the SDNP area of Lewes, and 5 in Lewes. In relation to transit provision, the GTAA noted that there is currently a transit site in the study area with 9 pitches at Birdies Tan, Lewes. The GTAA suggests a provisional need for an additional 8 transit pitches across the study area, but states that it is difficult to provide definitive information in relation to where the additional transit provision should be provided.

Wealden GTAA 2016

2.47 According to this GTAA, over the period 2016-2038 there was a need for 21 pitches for households that meet the PPTS 2015 planning definition; up to 6 pitches for households whose planning status is undetermined; and 5 pitches for households that

[15] It should be noted that the government's white paper 'Planning for the Future' (August 2020) indicates that it intends to remove the Duty to Cooperate test (although further consideration will be given to the way in which strategic cross-boundary issues, such as major infrastructure or strategic sites, can be adequately planned for, including the scale at which plans are best prepared in areas with significant strategic challenges).

do not meet the planning definition. The GTAA states that as both transit accommodation and accommodation for Travelling Showpeople were considered by the East Sussex and South Downs National Park GTAA (January 2015), there was not a need for this to be considered again by the 2016 GTAA.

Rother District Council Gypsy, Traveller and Travelling Showpeople Background Paper 2011

2.48 The background paper pre-dated PPTS 2015. It examined evidence in order to determine the appropriate number of Gypsy and Traveller pitches required within the district based on local need. It identified a need for 11 pitches up to 2028.

Brighton and Hove GTAA 2019

2.49 According to the GTAA, over the period 2019-2036 there is a need for 11 pitches for households that meet the PPTS 2015 planning definition; 0 pitches for households whose planning status is undetermined; and 33 pitches for households that do not meet the planning definition. The GTAA determined that there is no additional need for Travelling Showpeople plots for the same period. In relation to transit provision, the GTAA recommends that there is no need for any additional permanent public provision. However, due to seasonal variations in unauthorised encampments, it recommends that the local authority consider short-term seasonal provision.

Coastal West Sussex GTAA 2019

2.50 GTAA was undertaken on behalf Adur District Council, Arun District Council, Chichester District Council, and Worthing Council. It states that over the period 2018-2036 there is a need for 126 pitches for households that meet the PPTS 2015 planning definition; 31 pitches for households whose planning status is undetermined; and 55 pitches for households that do not meet the planning definition. It also identifies a need of 44 Travelling Showpeople plots for households that meet the PPTS 2015 planning definition; 6 plots for households whose planning status is undetermined; and 0 plots for households that do not meet the planning definition. In relation to transit provision, the GTAA recommends that as well as the existing transit site in Chichester, the Councils could consider the use of management arrangements for dealing with unauthorised encampments and could also consider the use of negotiated stopping agreements, as opposed to taking forward a further infrastructure-based approach.

Horsham GTAA 2020

2.51 The GTAA separately identifies accommodation needs in relation to Horsham District which excludes the part of the District covered by the South Downs National Park (SDNP), and those that fall within the SDNP. In relation to the former, it states that there is a need for 93 pitches for households that meet the PPTS 2015 planning definition; 6 pitches for households whose planning status is undetermined; and 19

pitches for households that do not meet the planning definition. The GTAA determined that there is no additional need for Travelling Showpeople plots for the same period. The GTAA also determines that there is no current or future need for pitches in the SDNP area of Horsham. In relation to transit provision, the GTAA states that there was no need for any new transit provision in Horsham at the time.

Mid Sussex GTAA 2016

2.52 The GTAA states that over the period 2016-2031 there is a need for 0 pitches for households that meet the PPTS 2015 planning definition; 4 pitches for households whose planning status is undetermined; and 20 pitches for households that do not meet the planning definition. The GTAA identifies no current or future need in relation to Travelling Showpeople. The GTAA recommends that as there is an operational transit site in Chichester there is no need for additional transit provision in the district.

Sevenoaks GTAA 2017

2.53 The GTAA identified a need for 51 additional pitches for households over the period 2017/18 to 2034/5 who culturally identify as Gypsies and Travellers, and 11 additional pitches for households who meet the PPTS 2015 definition. According to the GTAA, there are currently no Travelling Showpeople living in Sevenoaks and on this basis, there is no need for Travelling Showpeople plots. In relation to transit provision, the GTAA recommends that the Council consider the use of existing local authority sites to provide a small number of pitches suitable for transit use but that no new site is currently required.

Tandridge GTAA 2017

2.54 The GTAA identified a need for 5 additional pitches for households that meet the 'travel to work' planning definition, a need for up to 15 additional pitches for households whose planning status is unknown, and 23 additional pitches for households that do not meet the planning definition. The GTAA also identified a need for 21 additional Travelling Showpeople plots for households that meet the 'travel to work' planning definition, a need for up to 5 additional plots for households whose planning status is unknown, and 3 additional plots for households that do not meet the planning definition. In relation to transit provision, the GTAA recommends the use of short-term toleration or negotiated stopping agreements to deal with any encampments.

Tunbridge Wells GTAA 2018

2.55 The GTAA found a need for 32 additional pitches for the period 2017-2037 in relation to households who meet the PTTS 2015 definition, and 24 who meet the 'travel to work' definition. It found no need for additional Showpeople plots during the same period. In relation to transit provision, the GTAA recommended that the local authority implements a corporate policy in place to address negotiated stopping places for small scale transient encampments, and continues to work with local authorities across the county to provide new transit provision.

Summary

2.56 The PPTS (August 2015) emphasises the need for local authorities to use evidence to plan positively and manage development. The Housing and Planning Act 2016 amends section 8 of the Housing Act 1985 governing the assessment of accommodation needs to include all people residing in the study area in caravans or houseboats. However, for planning purposes, as noted above, the PPTS (August 2015) still requires local authorities to identify the accommodation needs of Gypsies, Travellers and Travelling Showpeople who accord with the definition in Annex 1 of the PPTS.

2.57 This GTAA recommends the adoption of the PPTS figure and to use the 'ethnic' need as a reserve need level as it takes into account the accommodation need of all of the Gypsies and Travellers in the area. The 'work' interpretation of need should be used as a form of reference and comparison with other authorities who use this approach.

2.58 Each authority is at a different stage in the progression of their Local Plans, although 5 out of the 6 planning authorities are currently undertaking updates of their Local Plans. All study area local authorities have adopted criteria-based policies to determine suitable locations for new sites and yards.

2.59 Given the cross-boundary nature of Gypsy and Traveller accommodation issues, it is important to consider the findings of GTAAs produced by neighbouring local authorities. GTAAs recently undertaken by neighbouring local authorities discussed above indicate that there remains some Gypsy and Traveller accommodation need throughout the region, but none have suggested a need arising in their area that should be met within the study area.

3. Trends in the population levels

Introduction

3.1 This section examines population levels in the GTAA study area and population trends. The primary source of information for Gypsies and Travellers (including Travelling Showpeople) in England is the Government's National Traveller Caravan Count. This was introduced in 1979 and places a duty on local authorities in England to undertake a twice-yearly count for the Department for Levelling Up, Housing and Communities (DLUHC) (formerly the Ministry for Communities and Local Government, MHCLG) on the number of Gypsy and Traveller caravans in their area. The count was intended to estimate the size of the Gypsy and Traveller population for whom provision was to be made and to monitor progress in meeting accommodation need.

3.2 Although the duty to provide sites was removed in 1994, the need for local authorities to conduct the count has remained. There are, however, several weaknesses with the reliability of the data. For example, across the country, counting practices vary between local authorities, and the practice of carrying out the count on a single day ignores the fluctuating number and distribution of unauthorised encampments. Also, some authorities include Travelling Showpeople in the same figures as Gypsies and Travellers, whilst others distinguish between the different groups and do not include Travelling Showpeople.

3.3 Significantly, the count is only of caravans (tourer and static caravans) and so Gypsies and Travellers residing in bricks and mortar accommodation are excluded. It should also be noted that pitches / households often contain more than one caravan, typically two or three.

3.4 Despite concerns about accuracy, the count is a useful indicator because it provides the only national source of information about numbers and distribution of Gypsy and Traveller caravans. As such, it is useful for identifying trends in the Gypsy and Traveller population, if not determining absolute numbers.

3.5 The Government's National Count includes data concerning Gypsies and Travellers sites[16]. It distinguishes between caravans on socially rented authorised sites, private authorised sites and unauthorised pitches. Unauthorised sites and pitches are broken down as to whether they are tolerated or not tolerated (please see Glossary for definitions). The analysis in this chapter includes data from January 2016 to July 2021.

[16.] Data regarding Travelling Showpeople is published separately by Government as 'experimental statistics'.

Population

3.6 The total Gypsy and Traveller population residing in the UK is unknown although the government estimate there to be between 100,000 and 300,000 Gypsy and Traveller people[17]. There are uncertainties partly because of the number of different definitions that exist, but mainly because of an almost total lack of information about the numbers of Gypsies and Travellers now residing in bricks and mortar accommodation. Estimates produced for the DLUHC suggest that at least 50% of the overall Gypsy and Traveller population are now residing in permanent housing.

3.7 Local authorities in England provide a count of Gypsy and Traveller caravans in January and July each year for the DLUHC. Due to Covid-19 restrictions the Count did not take place in July 2020 or January 2021. The July 2021 Count (the most recent figures available) indicates a total of 24,203 caravans. Applying an assumed three person per caravan[18] multiplier would give a population of 72,609 persons.

3.8 Applying an assumed multiplier of three persons per caravan and doubling this to allow for the numbers of Gypsies and Travellers in housing,[19] gives a total population of 145,218 persons for England. However, given the limitations of the data this figure can only be very approximate, and may be a significant underestimate.

3.9 According to Niner[20], there are three broad groupings of Gypsies and Travellers in England: traditional English (Romany) Gypsies, traditional Irish Travellers, and New Travellers. There are smaller numbers of other types of Gypsies and Travellers including Welsh Gypsies and Scottish Travellers. Romany Gypsies were first recorded in Britain around the year 1500, having migrated across Europe from an initial point of origin in Northern India. Also, in the early 1990s Roma started to arrive from the new EU countries, particularly the Czech Republic, Poland, Romania and Slovakia.

3.10 Importantly, Romany Gypsies and Irish Travellers have been recognised by the courts to be two distinct ethnic groups, so have the full protection of the Equalities Act 2010. This means that they have the right to be free from racial harassment and discrimination. All public sector organisations have a positive duty under the law to eliminate racial discrimination and promote equality of opportunity, which includes Romany Gypsies and Irish Travellers.

[17] House of Commons 'Tackling inequalities faced by Gypsy, Roma and Traveller communities' April 2019 located at: www.parluament.uk

[18] Niner, Pat (2003), Local Authority Gypsy/Traveller Sites in England, ODPM.

[19] Ibid.

[20] Pat Niner Counting Gypsies & Travellers: *A Review of the Gypsy Caravan Count System,* ODPM, February 2004 located at http://www.communities.gov.uk/documents/housing/pdf/158004.pdf

3.11 For the first time, the national census undertaken in 2011 included the category of 'Gypsy or Irish Traveller' in the question regarding ethnic identity (preliminary results from the 2021 Census are expected in March 2022). Table 3.1 below shows the total population and Gypsy and Traveller population per study area local authority[21] as derived from the 2011 Census (although it is acknowledged that the Census figures may underestimate the Gypsy and Traveller population[22]). It shows that in 2011, there were 815 Gypsies and Travellers residing in the study area representing around 0.15% of the usual resident population[23]. This is above the average for England and Wales of 0.10%. The proportion of Gypsies and Travellers recorded in the study area local authorities varied widely with 0.07% of Eastbourne recorded as Gypsies or Travellers, 0.10% of Lewes, 0.15% of Rother, 0.17% of Hastings and 0.25% of Wealden. Please note that 2011 Census data shows that there were 247 Gypsies and Travellers recorded in the SDNPA, although this has not been included in Table 3.1 in order to avoid double-counting.

Table 3.1 Gypsy and Traveller Population

	Population (no.)	G&T Pop (no.)	G&T Pop (%)
Eastbourne	99,412	66	0.07%
Hastings	90,254	150	0.17%
Lewes	97,502	97	0.10%
Rother	90,588	134	0.15%
Wealden	148,915	368	0.25%
Total	526,671	815	0.15%

Source: Census 2011 cited by NOMIS 2020

3.12 Figure 3.1 below shows the Gypsy and Traveller population as a proportion of the total population for the study area local authorities[24] in the context of other neighbouring West Sussex local authorities, as well as the city of Brighton and Hove (the study area local authorities are shaded in red). It shows that Eastbourne (0.07%) and Lewes (0.10%), Rother (0.15%), and Hastings (0.17%) are at or below the South East average (0.17%), whilst Wealden (0.25%) is above.

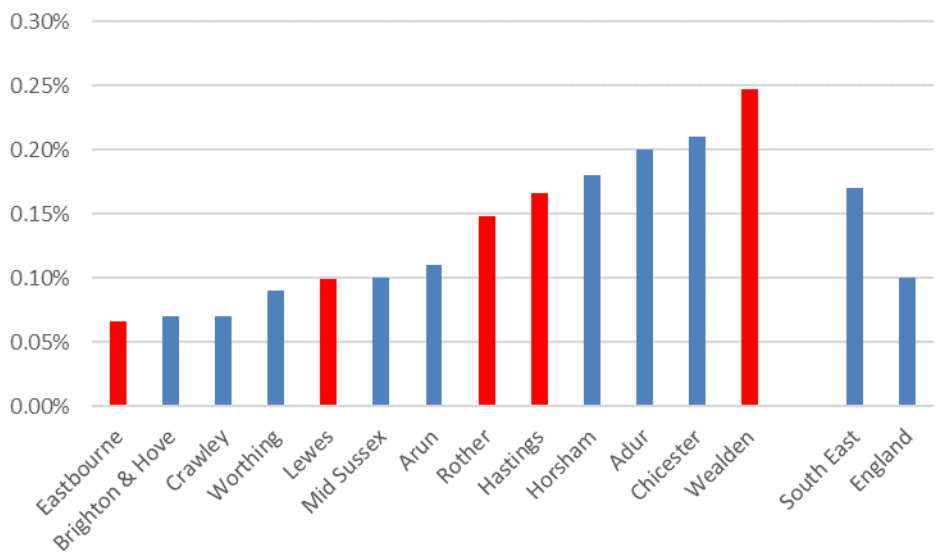
Figure 3.1 Gypsy and Traveller Population (Sussex LAs)

[21] Including the local authority areas covered by the South Downs National Park.

[22] House of Commons Library Briefing Paper Number 08083, 'Gypsies and Travellers' 9 May 2019.

[23] See ONS 2011 Census Table KS201EW Ethic Group located at: http://www.ons.gov.uk/

[24] Including the local authority areas covered by the South Downs National Park.



Source: Census 2011 cited by NOMIS 2021

3.13 It is also possible to determine the Gypsy and Traveller population within the study area by tenure. Derived from 2011 Census data, Table 3.2 shows the tenure of 279 Gypsy and Traveller households residing within the study area[25]. Almost half (49%) of households reside in social rented accommodation (compared with 46% in the South East and 42% in England), whilst just over a quarter (26%) reside in owned accommodation (compared with 35% in the South East and 33% in England), and a quarter (25%) reside in private rented accommodation (compared with 19% in the South East and 25% in England). This includes households residing both on sites and in bricks and mortar accommodation, but it is not possible to determine which are on sites and which are in bricks and mortar (the accommodation needs of Gypsy and Traveller households residing in bricks and mortar accommodation is discussed in Chapter 5).

Table 3.2 Gypsy and Traveller households by tenure

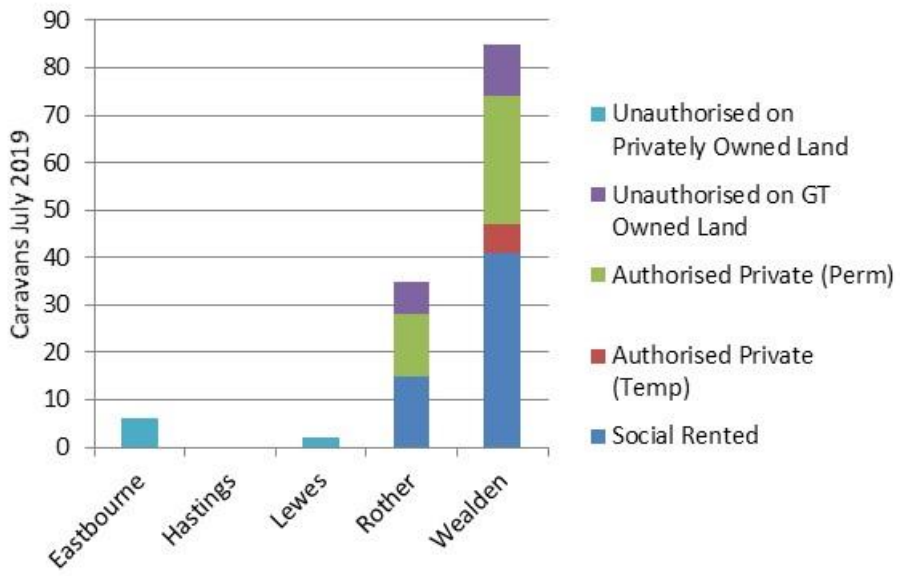
[25] Including the local authority areas covered by the South Downs National Park.

	Owned		Social rented		Private rented		Total	
Eastbourne	4	15%	14	54%	8	31%	26	100%
Hastings	7	11%	26	41%	30	48%	63	100%
Lewes	9	29%	17	55%	5	16%	31	100%
Rother	18	43%	20	48%	4	10%	42	100%
Wealden	34	29%	60	51%	23	20%	117	100%
Total in Study Area	72	26%	137	49%	70	25%	279	100%
South East	1,746	35%	2,283	46%	971	19%	5,000	100%
England	6,518	33%	8,162	42%	4,778	25%	19,458	100%

Source: Census 2011 cited by NOMIS 2021

3.14 Figure 3.2 below shows that a total of 128 caravans were recorded by the July 2021 Caravan Count in the study area[26]. There is some variation in the number of caravans in each local authority with no caravans recorded in Hastings, only 2 recorded in Lewes, and 6 in Eastbourne. In contrast, 35 caravans were recorded in Rother and 85 caravans in Wealden. The 128 caravans recorded included 56 caravans located on social rented pitches, 46 caravans on private pitches consisting of 40 pitches with permanent planning permission and 6 on a pitch with temporary planning permission, 18 on unauthorised pitches on land owned by Gypsies and Travellers, and 8 on unauthorised pitches on land not owned by Gypsies and Travellers.

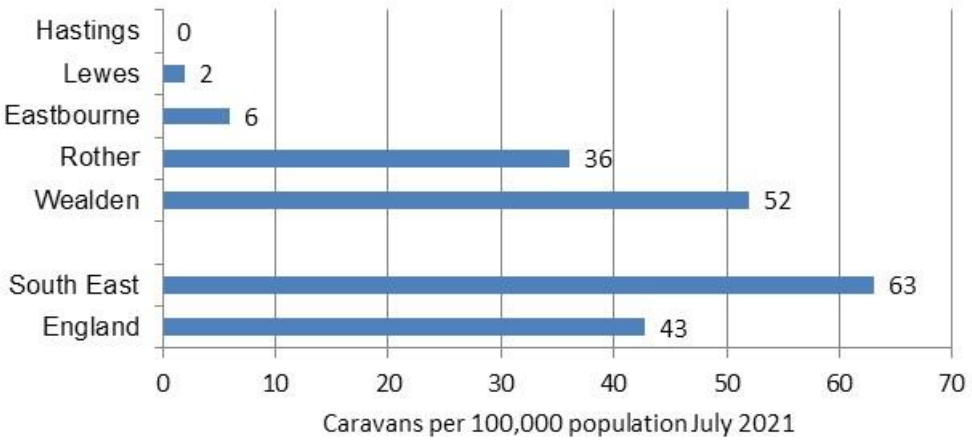
Figure 3.2 Caravans in the study area July 2021



Source: July 2021 DLUHC Traveller Caravan Count

Figure 3.3 Pro rata comparison of Caravans per 100,000 population July 2021

[26] Including the local authority areas covered by the South Downs National Park.

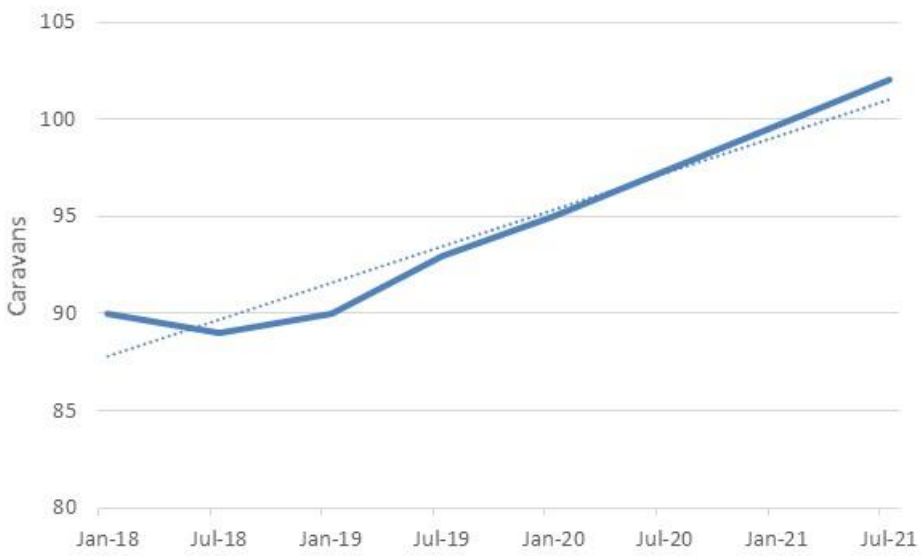


Source: July 2021 DLUHC Traveller Caravan Count

3.15 Figure 3.3 above shows that when the population is taken into account, the density of caravans varies. As stated above, Hastings did not record any caravans as part of the Government's July 2021 Traveller Caravan Count, whilst Lewes recorded 2 caravans per 100,000 population and Eastbourne 6. In contrast, Rother recorded 36 caravans per 100,000 population and Wealden 52. This compares to 63 caravans per 100,000 population in the South East and 43 caravans per 100,000 population in England.

3.16 Figure 3.4 below shows the total number of caravans on authorised pitches in the study area over the period January 2018 to July 2021. The Traveller Caravan Count recorded a total of 90 caravans located on authorised pitches in January 2018 compared to 102 caravans in July 2021.The dotted trend line shows that over the last 3.5 years there has been an increase in the number of authorised caravans recorded in the study area. Over three quarters (76%) of caravans on authorised pitches during the period January 2018 to July 2021 were recorded in Wealden and almost a quarter (24%) in Rother.

Figure 3.4 Study area authorised caravans Jan 2018-July 2021



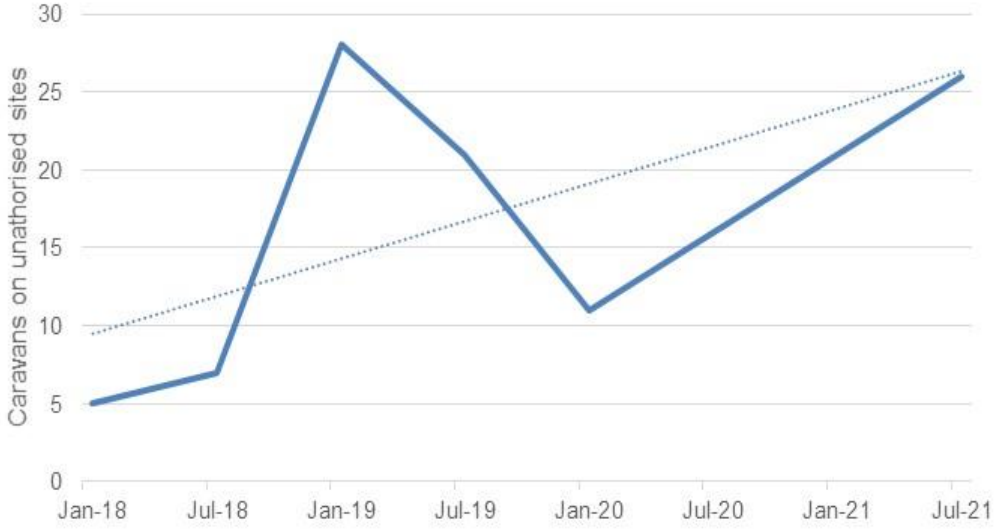
Source: July 2021 DLUHC Traveller Caravan Count

Data on unauthorised encampments

3.17 DLUHC data on unauthorised encampments (i.e. caravans residing temporarily on 'pitches' without planning permission) is of limited accuracy, although it may indicate general trends. Figure 3.5 below shows a relatively small number of caravans recorded on unauthorised pitches in the study area over the period January 2018 to July 2021.

3.18 The dotted trend line shows an increase in the number of unauthorised encampments over the period January 2018 to July 2021. It peaked at 28 caravans in January 2019 before declining to 21 caravans in July 2019, and 11 caravans in January 2020. However, it then increased to 26 caravans in July 2021. On average, just under two fifths (39%) of unauthorised encampments were recorded in Wealden, just over a fifth (22%) in Lewes, and just under a fifth (19%) in Eastbourne. Smaller proportions were recorded in Rother (13%), and Hastings (7%).

Figure 3.5 Unauthorised caravans in the study area Jan 2018-Jul 2021



Source: July 2021 DLUHC Traveller Caravan Count

Local authority data on unauthorised encampments

3.19 As previously noted, the Government's data on unauthorised encampments (i.e. caravans residing temporarily on 'sites' without planning permission and consent from the land owner (including roadside encampments)) is of limited accuracy, although it may indicate general trends. East Sussex County Council keep more detailed records of unauthorised encampments. However, there are some weaknesses in relation to the unauthorised encampment data. For example, some households residing on unauthorised encampments reside on permanent accommodation outside the study area. Also, some unauthorised encampments are occupied by homeless households who do not identify as Gypsies or Travellers. Finally, not all households occupying unauthorised encampments are likely to meet the PPTS 2015 definition.

3.20 Table 3.3 below shows a total of 137 unauthorised encampments took place in the study area during the period 2017/18 to the first half of 2020/21 (1 April 2017 to 30 September 2020). The number of unauthorised encampments peaked at 46 in 2018/19 before declining to 32 in 2019/20. However, 35 unauthorised encampments were recorded in the first 6 months of 2020/21 suggesting that the total number for the year may exceed the 46 recorded in 2018/19. Between 2017 and 2020, over a quarter (36 or 26%) of unauthorised encampments took place in Lewes, over a fifth (29 or 21%) in Wealden, and under a fifth in Hastings (25 or 18%), Rother (24 or 18%), and Eastbourne (17%).

Table 3.3 Unauthorised encampments 2017/18 to 2020/21

	2017/18	2018/19	2019/20	2020/21*	Total	%
Eastbourne	7	4	6	6	23	17%
Hastings	2	5	13	5	25	18%
Lewes	5	18	7	6	36	26%
Rother	2	10	6	6	24	18%
Wealden	8	9	0	12	29	21%
Total	24	46	32	35	137	100%

Source: East Sussex County Council 2021

* Covers period 1 April to 30 September 2020

3.21 East Sussex County Council also records the accommodation status of households residing on unauthorised encampments. As Table 3.4 below shows, over a third (37%) of households residing on unauthorised encampments in the study area between 2017/18 to 2020/21 had permanent accommodation elsewhere, whilst a similar proportion (36%) had no access to permanent accommodation (the accommodation status was unknown in 26% of cases). In a small proportion (13%) of unauthorised encampments households were directed to the Bridies Tan transit site under section 62a of the Criminal Justice and Public Order Act 1994.

Table 3.4 Accommodation status of UE households

	2017/18	2018/19	2019/20	2020/21*	Total	%
Perm homes	6	15	18	12	51	37%
Not known	10	21	1	4	36	26%
Homeless	8	10	13	19	50	36%
Total	24	46	32	35	137	100%

Source: East Sussex County Council 2021

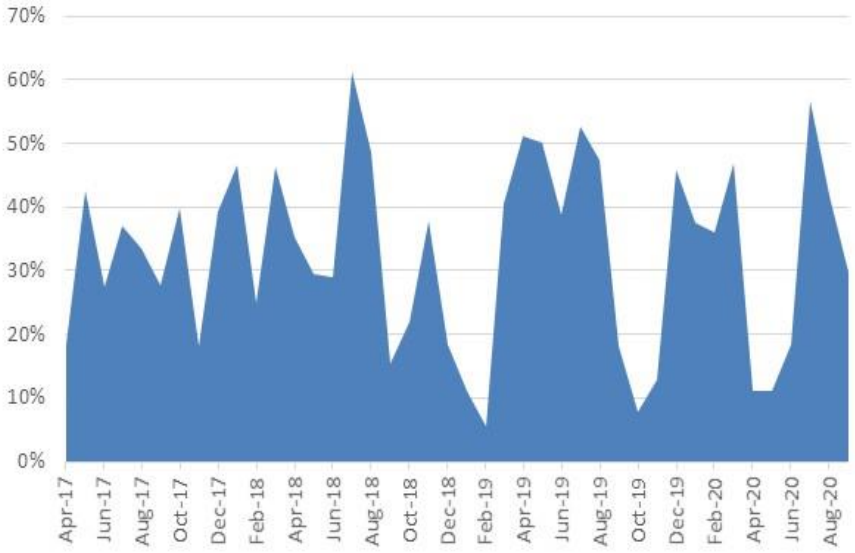
* Covers period 1 April to 30 September 2020

Bridies Tan Transit Site

3.22 East Sussex County Council manage a 9-pitch transit site located close to the A27 trunk road just outside of Lewes. The site is used on a short-stay (maximum 12 weeks) basis for households travelling through the county. Only one caravan or campervan per pitch is allowed. If the maximum stay is granted, then return is not permitted for 6 months. Each pitch has an electrical hook up point and water supply. The rent is £60 per week, per pitch which includes payment for water. Residents have access to their own shower and toilet block. Electricity is available via a meter and paid directly to site's management company and charged at standard rate.

3.23 Analysis of data shows that between April 2017 and September 2020, on average, a third (33%) of the 9 pitches were occupied at any one time. As can be seen from Figure 3.6 below, the proportion of pitches occupied varied widely between the period April 2017 to September 2020. However, on average, the transit pitches were most likely to be occupied during the summer months, and less likely to be used during the winter months.

Figure 3.6 Bridies Tan Transit Site Use April 2017 to September 2020



Source: East Sussex County Council 2021

Gypsy and Traveller pitches within the study area

3.24 Table 3.5 shows the number of sites and pitches in each study area planning authority by type.

Table 3.5: Gypsy and Traveller sites and pitches per authority

	Sites	Pitches	Unauth. Dev. sites	Unauth. Dev. pitches	Temp sites	Temp pitches	Transit sites	Transit pitches
Eastbourne	0	0	0	0	0	0	0	0
Hastings	0	0	2	3	0	0	0	0
Lewes	1	3	0	0	0	0	0	0
Rother	4	17	4	8	0	0	0	0
SDNPA	2	7	0	0	0	0	1	9
Wealden	13	49	5	5	1	1	0	0
Total	20	76	11	16	1	1	1	9

Source: Study area local authorities' planning records (November 2020)

Travelling Showpeople

3.25 Data from planning permissions are also available in the study area showing provision for Travelling Showpeople. The cultural practice of Travelling Showpeople is to live on a plot in a yard in static caravans or mobile homes, along with smaller caravans used for travelling or inhabited by other family members (for example, adolescent children). Their equipment (including rides, kiosks and stalls) is usually kept on the same plot. There is only one known Showpeople yard in the study area located in Wealden.

Through consultation with the Showmen's Guild and National Circus Association, it was confirmed that this is the only known yard in the area.

Boat dwellers

3.26 There is limited access to navigable waterways in the study area. Also, there are only a few marinas, most of which are primarily occupied by residents using boats for leisure purposes and reside elsewhere.

3.27 There are no permanent boat dwellers residing in the Rother District Council local authority area. Some boat dwellers reside on the River Rother at Rye Harbour. However, these are understood to have permanent addresses elsewhere (i.e. they do not permanently reside on boats). There is no planning permission for permanent residential moorings in Rother and doing so would breach local Byelaws.

3.28 Wealden District Council are not aware of any boat dwellers residing permanently within the local authority area. There is only a small area of coastline located outside of the South Downs National Park (SDNP) at Pevensey Bay. This stretches between Sovereign Harbour (situated in Eastbourne) and almost to Norman's Bay Train Station (situated within Rother). There are no known moorings in that area.

3.29 Within Eastbourne Borough there are berths at Sovereign Harbour, however, according to stakeholders, the berthing agreements specify boat dwellers can only occupy boats for 30 days in any 3-month period. The marina regulations mean that boat dwellers are not allowed to permanently reside on boats and must provide a permanent postal address elsewhere. There was some relaxation of rules during the Covid-19 restrictions on travel, although these are now being enforced.

3.30 Within Lewes district, there are some moorings located at Denton Island, in the middle of Newhaven marina. However, strong tides mean that it can be difficult to permanently moor boats on the island. The waterways in both the South Downs National Park (SDNP) and Hastings are mainly non-navigable. There are some coastal waters, but they are regarded by the local authority and waterways authorities as not appropriate for permanent boat dweller moorings.

Summary

3.31 The 2011 Census suggests there were 815 Gypsies and Travellers residing in the study area representing about 0.15% of the total population compared to 0.10% in England. The 2011 Census records a total of 279 Gypsy and Traveller households residing within the study area of which almost half (49%) reside in social rented accommodation, whilst just over a quarter (26%) reside in owned accommodation, and a quarter (25%) reside in private rented accommodation.

3.32 The Government's July 2021 Count shows there were 128 Gypsy and Traveller caravans located in the study area including 56 caravans located on social rented pitches, 46 caravans on private pitches consisting of 40 pitches with permanent planning permission and 6 on a pitch with temporary planning permission, 16 on unauthorised pitches on land owned by Gypsies and Travellers, and 8 on unauthorised pitches on land not owned by Gypsies and Travellers.

3.33 In relation to density, Hastings did not record any caravans as part of the Government's July 2021 Traveller Caravan Count, whilst Lewes recorded 2 caravans per 100,000 population and Eastbourne 6. In contrast, Rother recorded 36 caravans per 100,000 population and Wealden 52. This compares to 63 caravans per 100,000 population in the South East and 43 caravans per 100,000 population in England. The total number of caravans recorded on authorised pitches increased over the 3.5-year period with 102 caravans recorded in July 2021 compared to 90 in January 2018.

3.34 Government data has recorded relatively few unauthorised encampments within the study area over the period January 2018 to July 2021. The number of unauthorised caravans recorded by Government peaked at 28 caravans in January 2019 before declining to 21 caravans in July 2019, and 11 caravans in January 2020. However, it then increased to 26 caravans in July 2021.

3.35 East Sussex County Council keep more detailed records of unauthorised encampments. The number of unauthorised encampments peaked at 46 in 2018/19 before declining to 32 in 2019/20. Between 2017 and 2020, over a quarter of unauthorised encampments took place in Lewes (26%) and over a fifth (21%) in Wealden. Smaller proportions took place in Hastings (18%), Rother (18%), and Eastbourne (17%).

3.36 The County Council also record the usage of the Bridie Tan transit site located close to the A27 trunk road just outside of Lewes. On average, a third (33%) of the 9 pitches were occupied at any one time. The proportion of pitches occupied varied widely between the period April 2017 to September 2020. However, on average, the transit pitches were most likely to be occupied during the summer months, and less likely to be used during the winter months.

3.37 As of September 2021 (see table 3.5 above) the study area contained 98 pitches consisting of 39 private pitches with permanent planning permission, 33 local authority owned and managed pitches with permanent planning permission, 1 pitch with temporary planning permission, 9 transit pitches (located in SDNPA), and 16 pitches located on unauthorised developments. There is one known Travelling Showpeople yard within the study area, with equivalent of four plots. There are no known permanent boat moorings located within the study area.

4. Stakeholder consultation

Introduction

4.1 This chapter provides data from consultation with a range of stakeholders (service providers) including planning and planning policy officers, environmental health officers, County Gypsy and Traveller liaison team officers, strategy specialist, National Bargee Traveller Association, Showmen's Guild, Friends, Families and Travellers, education team officers, health team officers, and marina managers and owners – both within the study area and neighbouring authorities.

4.2 It provides in-depth qualitative insight into the accommodation needs of Gypsies and Travellers. The aim of this section of the consultation was to obtain both an overall perspective on issues facing these groups, and an understanding of local issues that are specific to the study area from the perspective of key service providers in relation to the study area and neighbouring authorities.

4.3 Due to Covid-19 restrictions, the consultation took the form of an online survey and telephone consultation. In recognition that Gypsies and Traveller issues transcend geographical boundaries and the duty to cooperate in addressing their accommodation needs, consultation was undertaken with officers from within the study area and from neighbouring authorities.

4.4 Themes discussed through the consultation included the need for additional accommodation and facilities; travelling patterns; the availability of land; accessing services; and work taking place to meet the needs of the different community groups.

4.5 This chapter presents brief summaries of the consultation with stakeholders and highlights the main points that were raised. It presents the perspectives of service providers regarding the Gypsies and Traveller communities. Their perspectives are presented in the following chapter, which focuses on the consultation carried out with members of these communities within the assessment area. These will qualify any perceptions of the issues raised by stakeholders and quantify any need for additional provision for permanent, and transit provision on sites. Please note that the below reflects the views of the stakeholders and not necessarily the authors.

Accommodation

4.6 Stakeholders were asked about the main issues facing Gypsies and Travellers in the study area and neighbouring authority areas. It was agreed by the majority of stakeholders that there is a need for more permanent provision both within the study area and neighbouring authority areas such as Brighton and Hove, and Mid Sussex. In some cases, a lack of culturally suitable, affordable accommodation has led to

increased waiting lists for pitches and households residing in bricks and mortar accommodation. It was suggested that some pitches in the study area do not meet the needs of Gypsy and Traveller households. It was noted that some sites are occupied by extended families, meaning that they may not be available to be occupied by non-related households. Also, Gypsy and Traveller households would prefer to reside on sites located in rural areas which are less likely to be granted planning permission, particularly in designated areas (i.e., National Park and AONB). One study area local authority stated that whilst they have recently made good progress in delivering new sites, there remains an under-supply.

4.7 Stakeholders cited a range of factors which lead to accommodation need. The main driver of accommodation need in relation to the Gypsies and Travellers was determined as new family formation which is putting pressure on existing sites. This includes older children requiring separate accommodation. It was suggested that there is currently a lack of suitable accommodation in East Sussex to accommodate the needs of children when they reach adulthood. According to one study area local authority, whilst the accommodation needs of households are currently being met, household formation and potential in-migration may lead to additional accommodation need. A stakeholder stated that there is a continued high demand for permanent pitches, particularly around the Hailsham area.

4.8 According to stakeholders from Eastbourne and Hastings, there has been limited interest from Gypsy and Traveller households for permanent site provision. There are some Gypsy and Traveller households residing in bricks and mortar accommodation in both local authority areas. This includes second or third generation Gypsy and Traveller households residing in bricks and mortar accommodation in Hastings.

4.9 Some Gypsy and Traveller households travel to coastal parts of the study area to visit family or to attend events, whilst Showpeople travel for fairs. However, stakeholders stated that apart from two tolerated unauthorised developments in Hastings, there are no other known authorised or unauthorised sites in either Hastings or Eastbourne.

4.10 Stakeholders commented on how New Travellers are more likely to travel to coastal areas such as Hastings and Eastbourne[27]. There are some New Travellers residing within the study area as well as in the neighbouring Brighton area. There is a long history of New Travellers residing in coastal areas for work purposes. According to the Showmen's Guild, Travelling Showpeople in coastal areas usually reside in houses, although they may use yards for storing equipment. However, they suggested that not all fairs and amusements within the study area are managed by Travelling Showpeople.

[27] Although Table 3.5 shows that unauthorised encampments are more likely to take place in Lewes and Wealden.

4.11 There are limited safe places for boat dwellers to navigate or moor around the coastal areas. There are marinas located in the study area although they are primarily for mooring leisure cruisers. There are no known permanent moorings with authorised planning permission for boat dwellers to permanently moor in the study area. However, some marinas in the study area allow boat dwellers to reside for up to 30 days in any 3-month period. There is also anecdotal evidence of some boat dwellers requiring permanent moorings.

4.12 There is evidence of Gypsy and Traveller households from elsewhere in the south east (especially deriving from a site located in Essex) purchasing land within the study area, and sometimes occupying the land, with the hope that this may lead to them gaining planning permission. This can lead to a cascading affect whereby one household purchasing land in an area may lead to a second household purchasing land etc. due to 'word of mouth'. Other factors noted included a lack of provision elsewhere leading to increased demand for accommodation within the study area; there are increasing waiting lists for accommodation on sites with permanent pitches; some accommodation need arising from overcrowding in existing accommodation and concealed households; and households residing in unsuitable bricks and mortar accommodation wanting to reside on sites. However, it was noted that any new provision should have regard to planning restrictions and the needs of the settled community.

4.13 Interestingly, in 2018, one study area local authority contacted a neighbouring local authority to determine whether the latter was able to meet an initial accommodation need of 3 pitches (later reduced to 1 pitch). A third local authority stated that they may be able to meet the need, dependent on their Local Plan (this is a good example of local authorities collaborating under the duty to cooperate legislation in relation to meeting accommodation needs).

4.14 In terms of preferred locations for new sites, stakeholders stated that accommodation need should be met where it arises[28]. Also, that new sites should be in sustainable locations with access to services such as schools, health care and public transport. However, one stakeholder stated that new sites should not be located in the open countryside and should seek to avoid national landscape designations and biodiversity constraints. There needs to be good connectivity to new sites, especially in relation to new Travelling Showpeople yards to allow for the transport of equipment. It was noted that the landscape of areas within the study area may differ (e.g. the west of Lewes District is very different compared to the east of Rother District). It was suggested that, where practicable and suitable in planning terms, existing private sites should be expanded to accommodate family needs. It was suggested that there needs to be input from the Traveller community to help local authorities better understand preferred site

[28] Although planning and environmental constraints may mean that this is not always possible.

locations and facilities – factors which could be fed into policy criteria and site assessments.

4.15 A key barrier to delivering new sites cited by stakeholders is a lack of suitable, affordable land within the study area and beyond. Sites and yards that do come forward can be highly constrained. It was suggested that sites and yards that are appropriate for Traveller use are often marketed for conventional housing. It was noted that geographical/planning constraints such as 'Areas of Outstanding Natural Beauty' (AONB), wildlife designations, and flood risk can be limiting factors. Significant proportions of East Sussex are protected by national landscape designations such as the High Weald AONB and South Downs National Park, with other international biodiversity designations also constraining site development that includes the Ashdown Forest Special Area of Conservation (SAC)/Special Protection Area (SPA), Pevensey Levels SAC and Ramsar Site and Lewes Downs SAC. Land values are high and competition for land on the edge of settlements has meant that private Gypsy and Traveller sites tend to be located in the open countryside where values are lower (where bricks and mortar housing would not normally be considered suitable). Also, the vast majority of land promoted to the local authority for development is for housing the settled community.

4.16 The low residential land values generated by planning permission for a Gypsy and Traveller sites may be too low to maximise capital returns for landowners. As such, responsibility for delivering new provision is on local authorities or the Gypsy and Traveller community. Also, it was noted that public funding for new sites has significantly reduced in recent years and it is unlikely that new funding for sites will become available in the future. It was suggested that as some sites are occupied by single (extended) families, they may not be available to be occupied by unrelated households necessitating the need for new sites. There needs to be better government support and funding to help bring new sites forward, and for central government to make it a requirement for local authorities to provide pitches.

4.17 Several stakeholders stated that public opposition is a key barrier to new sites. This can be irrespective of the size of the proposed site. The settled community tend to support the development of conventional housing over the use of a site or yard by Travellers. There remains a lot of stigma attached to Travellers although some families have lived in the locations longer than the settled community. According to one study area authority, a prospective site included in the Local Plan was opposed by politicians and the local community although it was eventually approved by one vote. A lack of guidance regarding site design specification can hinder the process of identifying suitable locations.

Transit provision and travelling patterns

4.18 In terms of travelling patterns, it was suggested that Gypsy and Traveller households are more likely to travel during the summer and spring months compared to autumn or winter. The main reasons for travelling include visiting family or friends; to attend events; for cultural reasons; to holiday; and for work. According to some stakeholders, there is an increase in Gypsy and Traveller households transiting through the study area during the summer months leading to an increase in unauthorised encampments between May and September each year. Some households transiting through the study area have permanent accommodation elsewhere, whilst others do not. Some Gypsy and Traveller households residing in the study area have health issues, which prevent them from travelling.

4.19 It was noted that the South East Plan Partial Review (2008) considered the travel patterns for Gypsy and Traveller households requiring transit provision and found that the majority transiting through East Sussex travelled along the A259 and A22 corridors. However, it was suggested that East Sussex is not well known as a stopping place for work, so there are fewer transiting households. It was noted that some households are not able to stay at traditional stopping places, which means that they are more likely to remain on permanent sites.

4.20 One stakeholder noted a recent increase in the number of unauthorised encampments, although stated that this is sometimes due to families not wanting to occupy sites which are allocated elsewhere in the District. The increasing costs of residing in bricks and mortar accommodation may be leading to some households considering a more nomadic lifestyle. The 9-pitch transit site at Bridies Tan, located just outside Lewes, is not always sufficient to accommodate larger Gypsy and Traveller households transiting through East Sussex.

4.21 The main reasons stated by stakeholders for unauthorised encampments by Gypsies and Travellers taking place in the study area included a lack of available permanent pitches in suitable locations; households temporarily moving through the study area; insufficient number of transit sites; to find work; to undertake holidays. It was suggested that Gypsy and Traveller households can be reluctant to use managed transit sites as they may not offer value-for-money; may be hesitant to mix with households from a different Traveller ethnic group; or due to site management policies or restrictions. Also, some transit groups consist of more than 10 vehicles which are often too large to be accommodated on a transit site. Some households may prefer to encamp on open spaces in order to avoid charges associated with transit sites. It was noted that a new transit site has recently been developed in Chichester, West Sussex (also situated on the A27).

4.22 There was a mixed response by stakeholders as to the level of impact that the PPTS August 2015 definition has had on the travelling patterns of Gypsies and Travellers.

Most stakeholders stated that they were unsure of any impact although it was acknowledged that households may be more likely to travel in order to prove their status. However, one stakeholder stated that they had spoken to households who retain court paperwork and eviction notices from land they occupy in order to prove that they are still travelling. They also stated that Gypsies and Travellers have found it increasingly difficult to maintain their culture as they are not allowed to stay on land anymore and there are limited stopping places across the country. According to another stakeholder, a planning appeal for existing pitch accommodation was allowed by the Planning Inspectorate even though the household did not meet the PPTS definition as at least one family member had previously met the criteria.

4.23 Stakeholders stated that the main barriers to new transit provision are similar to those of permanent provision including lack of suitable sites; opposition from the settled community to new sites; the cost of development and management of sites; and difficulties in managing transit sites. Viability is a major factor as the cost of developing and managing transit sites can often outweigh the income received. Also, the incomes from transit sites can vary seasonally. This can affect an authority's decision-making process about site ownership and management or require subsidies from local authorities.

4.24 It was noted that the Bridies Tan transit site in Lewes District covers the western side of the county, and that additional transit sites might be preferable in the eastern part of the county. However, it was suggested that the Bridies Tan transit site is often under-occupied and cannot accommodate larger transiting groups. Whilst any new transit provision was likely to be managed by East Sussex County Council, study area local authorities would have to contribute towards initial and ongoing costs. The location of any new transit provision would have to be carefully considered given the limited number of trunk roads across the county (i.e. A259, A27 and A22). Similar to new permanent provision, stakeholders suggested that even if funding could be found, there is likely to be local opposition to new transit sites. According to one stakeholder, some local authorities outside the county have been attempting to deal with unauthorised encampments for years, but remain unable to develop necessary transit provision.

Relationship between Travellers communities and the settled community

4.25 According to stakeholders, there can be tensions between the different traveller groups and the settled community. Planning applications for new sites and yards tend to attract opposition from the settled community. This may occur even when the traveller communities have a long history of residing in local areas. Opposition from local people means it can be difficult to identify suitable sites or yards. Planning applications for new sites often attract a large number of objections from local communities. However, local communities may be more likely to support applications for new provision where the family is known to the local community.

4.26 The settled community frequently have negative views regarding the Gypsy and Traveller community and may stigmatise them. Planning applications for new sites often attract offensive and stereotypical views. However, the settled community do not appear to view the Travelling Showpeople community in such a negative manner[29]. Notwithstanding public responses to planning applications for new sites, it should be noted that existing Gypsy and Traveller sites do not appear to attract such negative comments.

4.27 In relation to improving the relationship between Gypsies, Travellers, and the settled community, it was suggested that there needs to be a better understanding of cultural differences between the communities. This could be achieved by undertaking education and awareness sessions or cultural events involving the local community, local authority staff, elected members, and agencies such as the police. It is particularly important for young people to have a better understanding of the Gypsy and Traveller community. More positive representation of the communities in the media should be encouraged. Gypsy and Traveller liaison officers can play an effective role in building good relationships with the Gypsy and Traveller community. One stakeholder commented on how there is a need for agencies to work together to help build trust between agencies and the different communities, although it is important to build genuine trust and avoid tokenism. However, this can take years or even generations to succeed.

Health and education needs

4.28 Stakeholders were asked if they were aware of any health, education or other service needs amongst the Gypsy and Traveller communities. Most stakeholder stated that they were not aware of any particular issues, although one was aware of Gypsy and Traveller children experiencing bullying at school. Also, one stakeholder stated that they are aware of number of health issues within the community including an increase in mental health issues.

4.29 Education officers working within the study area commented on how they provide advice and guidance to schools and help Gypsy and Traveller families. They work closely with the county Gypsy and Traveller Team and relevant agencies, not only in relation to education, but in relation to all the Gypsy and Travellers community's services and needs.

4.30 Stakeholders commented on how, in recent years, Gypsy and Traveller children are more likely to be involved in secondary, tertiary and higher education, as well as vocational qualifications. This is mainly due to most employment requiring a good level

[29] The authors of this report have found this to be the case elsewhere. This is possibly because Travelling Showpeople tend to offer a specific service e.g. fairs and events, and as they are unlikely to reside on unauthorised encampments, are more likely to be accepted by the settled community.

of education and qualifications. Consequently, Travellers are more committed to ensuring that children acquire a good education. As such, education opportunities can influence a Traveller household's choice of location.

Cooperation and joint working

4.31 Stakeholders were asked whether local authorities and agencies cooperate well on Gypsy, Traveller, Travelling Showpeople and boat dweller issues. Generally, stakeholders stated that there is good cooperation and communication between the different local authorities and agencies on Gypsy and Traveller issues within the county. There is particularly good communication and cooperation between the local authorities and the countywide Gypsy and Traveller Team which acts as a focal point for disseminating information. One stakeholder stated that there is good communication between the Local Authority's Planning and Environmental Health departments and East Sussex County Council.

4.32 It was noted that East Sussex has a cross-county Gypsy and Traveller Group which communicates well and liaises with relevant agencies. It was suggested that cooperation is strongest and most effective when agencies such as education, health, police, housing and planning etc. communicate well and have a good understanding of their respective roles.

4.33 Although local authorities collaborate on Gypsy and Traveller issues, including dealing with unauthorised encampments, determining new site provision, dealing with planning applications and appeals, and commissioning evidence such as the GTAA, it was suggested that there is a need for better communication between county councils. Also, there is less communication between the study area local authorities and representative bodies such as the Gypsy Council and Friends, Families and Travellers. Some stakeholders suggested the need for the training of officers and elected members to help them better understand the needs of the different communities.

Summary

4.34 The consultation with key stakeholders offered important insights into the main issues within the study area. According to stakeholders, the main driver of accommodation need was determined as new family formation, which is putting pressure on existing provision. Also, there is evidence of Gypsy and Traveller households from elsewhere in the South East purchasing land within the study area, and sometimes occupying the land, with the hope that this may lead to them gaining planning permission.

4.35 Other factors noted were that a lack of provision elsewhere may lead to increased demand for accommodation within the study area; increased waiting lists for accommodation on sites with permanent pitches; some accommodation need arising from overcrowding in existing accommodation and concealed households; and households residing in unsuitable bricks and mortar accommodation and wishing to reside on sites.

5. Gypsies and Travellers consultation

Introduction

5.1 This chapter provides a snapshot of households residing in the study area at the time of the survey and an analysis of need for current and future pitches across the study area. In doing so, it examines the key findings derived from the consultation with Gypsy and Traveller families (the accommodation needs of Travelling Showpeople are discussed in Chapter 6).

5.2 Table 5.1 below lists the number of authorised sites and pitches, unauthorised sites and pitches, sites and pitches with temporary planning permission and unauthorised encampments and transit provision within the study area. Table 5.2 further below demonstrates the response rate for the consultation carried out with the households on the known authorised sites (including pitches with temporary status and those with permanent planning status). Every known authorised (both private and local authority) and unauthorised site was visited, and consultation with the households has taken into consideration the accommodation needs of every known pitch and site. Due to Covid-19 restrictions, a combination of direct consultation with households and proxy consultation with members of the community (including site owners, neighbours and relatives) was undertaken, some of which was undertaken over the phone. The combination of speaking directly to households (both on site and by telephone) together with proxy consultation resulted in data being obtained for 99% of the sites in the study area.

5.3 In relation to unauthorised developments (i.e. sites without planning permission which may be 'tolerated' or 'not tolerated' – see glossary), and transit provision, were all visited. There were 4 households on the transit site at the time of the consultation, and this data was gathered by a combination of visiting the site and consultation with the management team.

Table 5.1 Gypsy and Traveller sites and pitches per authority (July 2021)

	Sites	Pitches	UD sites	UD pitches	Temp sites	Temp pitches	Transit sites	Transit pitches
Eastbourne	0	0	0	0	0	0	0	0
Hastings	0	0	2	3	0	0	0	0
Lewes	1	3	0	0	0	0	0	0
Rother	4	17	4	8	0	0	0	0
SDNPA	2	7	0	0	0	0	1	9
Wealden	13	49	5	5	1	1	0	0
Total	20	76	11	16	1	1	1	9

Source: Study area local authorities

Table 5.2 Consultation with Gypsies and Travellers on authorised sites

	Pitches	Consultation	%
Eastbourne	0	0	0
Hastings	0	0	0
Lewes	3	3	100%
Rother	17	17	100%
SDNPA	7	7	100%
Wealden	49	48	98%
Total	76	75	98%

Source: GTAA 2022

5.4 The consultation included questions regarding a number of issues such as family composition (per pitch), accommodation and facilities, the condition, ownership, management and suitability of current sites and pitches (including facilities and services), occupancy of existing pitches (including the number of, and reasons for, vacant and / or undeveloped pitches and future plans for pitches), travelling patterns, health, education and employment, and accommodation needs.

5.5 The number and location of pitches were determined using local authority planning data. Households were consulted on key issues regarding accommodation needs. The consultation was undertaken between July and August 2021. The combination of local authority data, site visits and consultation with households helped to clarify the status of pitches (i.e. which pitches are occupied by Gypsies and Travellers, vacant pitches, overcrowded pitches, pitches occupied by household members with a need for separate accommodation, and hidden households, amongst other needs issues).

5.6 Attempts were made to access households residing in bricks and mortar accommodation. However, it was not possible to consult with households residing in bricks and mortar accommodation. This does not undermine any findings in relation to those in bricks and mortar accommodation, as an alternative method of taking into account the accommodation needs of those in bricks and motor with accommodation need have been taken into account (see step 15 of Table 5.3 below). The methods used in attempting to contact households residing in bricks and mortar accommodation included:

- Asking households residing on sites if they were aware of any relatives or friends residing in bricks and mortar accommodation;
- Contacting key stakeholders to request help to access Gypsies and Travellers living in bricks and mortar; and
- Seeking information about the location of households residing in bricks and mortar accommodation through the stakeholder interviews

Site and pitch provision

5.7 The following describes the Gypsy and Traveller site and pitch provision located in Eastbourne, Hastings, Lewes, Rother, SDNPA and Wealden.

Eastbourne

5.8 There are no known authorised or unauthorised sites in this area. All of the known Gypsy and Traveller community is living in bricks and mortar accommodation, and accordion to stakeholders, primarily Irish Travellers.

Hastings

5.9 There are no known authorised sites in this area. However, there are 2 known unauthorised sites (both of which are currently under review). One site is occupied by New Travellers and the second by a Gypsy family. There are also 2 pitches allocated in the Local Plan (which do not currently have planning permission and are undeveloped and unoccupied). If delivered, these 2 pitches will contribute towards addressing the identified accommodation needs. This is illustrated later in the chapter.

Lewes

5.10 There is one site with planning permission with 3 occupied pitches. There is another site allocated in the current Local plan, but not occupied or demonstrating any potential of occupancy. There are no known unauthorised developments

Rother

5.11 There are 5 private sites, 1 of which has been abandoned and unlikely to be available as a site in the future, and another which is currently unoccupied, but could potentially be available in the future. The other 3 are occupied private sites with a total of 9 pitches. One of the occupied sites also has 4 unauthorised developments (one of which is no longer in use). There is also a local authority site, with 8 pitches. There are a further 8 unauthorised developments (some occupied and some awaiting planning permission). There are also 4 pitches allocated in the local authority local plan. These are not included in the initial calculations, but illustrated later in this chapter how these four have the potential to impact on the identified need.

SDNPA

5.12 There are three authorised sites, 1 with 1 pitch, a second with 6 pitches and the third used as a transit site (owned by the local authority and managed by East Sussex County Council Gypsy and Traveller Team).

Wealden

5.13 There are 3 local authority sites with a total of 25 pitches (all occupied including 1 by a New Traveller, 1 by a non-Gypsy and Traveller who is widowed by a Gypsy and Traveller, and 23 by Gypsy and Travellers). There are also 10 private family sites with a total of 26 occupied pitches, 1 pitch with temporary planning permission, and 5 unauthorised development sites with 5 pitches. There is also a site for 15 pitches that was allocated in their withdrawn local plan and is subject to a live planning application.

Consultation

5.14 Most households were satisfied with the condition and location of respective sites. Although most commented on experiencing varying levels of racism, most spoke about feeling part of the local community. They stated that it is important to reside on family sites with sufficient space and good facilities. Owning the land they reside on, with family residing close by was regarded by households as ideal. Residing on rental land was the preferred alternative if owning land is not possible. Those on their own private sites were happier than those on rental sites, as they felt a degree of control about their sites, than those on rental sites.

5.15 Households residing on unauthorised developments felt unable to invest in their sites due to not having permanent planning permission. Some households residing on permanent sites commented on wanting to make improvements to their sites but being unable to do so due to a lack of finance or space restraints.

5.16 As well as having sufficient space and facilities on site, good access to local services including education, health, and retail facilities were also important to the households. They spoke about how having a support network involving services such as health and education is essential for both the adult members of the household and children. The support network is an important reason as to why a family prefers to remain in the local area.

5.17 Access to other types of services and facilities such as shops were also regarded as important. However, households stated that it is not important that these are in close proximity as long as they are accessible by car. Access to services for households without access to transport (e.g. due to age or health issues) was deemed problematic although such households were usually supported by family or neighbours. Households deemed it more important to reside on a site and for family members to reside close together than to have access to any particular service.

5.18 An example of racism that a number of households across the study area referred to was not being allowed in some of the pubs in the area due to being a Gypsy / Traveller. One commented on how this has been raised with the pub in their area, but nothing has changed. They all expressed concerns as to how pubs in that area are

discriminating against them on ethnic grounds and are still allowed to have a licence. One commented on how this should be a ground to refuse licensing of a premise / landlord.

5.19 Education was regarded as an important element of life for the families. They spoke of how this was becoming more important amongst Gypsy and Traveller communities, including learning to read and write, and gaining skills and qualifications. They also spoke of the importance of every generation learning the culture and skills linked to their way of life, and the importance of keeping their culture whilst at the same time gaining a good education. The families on the sites without permanent planning permission commented on how their children's education was one reason why they would prefer to reside on a permanent site.

5.20 Employment was also regarded as important. Households spoke of how Gypsies and Travellers travel more if they are unable to gain sufficient employment locally. Households were primarily self-employed with some occupants employed locally, unemployed, or retired. With Covid-19 restrictions in place, self-employed households or those who travel for work have struggled to find work.

5.21 Gypsy and Traveller households in the study area regard travel primarily for cultural and social reasons. Some households also travel for work purposes including the buying and selling of horses, building and construction work, and garden and maintenance work. Some households spoke about how Gypsies and Travellers do not travel as much as they used to. This is because they may be employed locally, or children may attend local schools. Households suggested that it can be difficult to travel due to limited stopping places, being moved on, and the increasing costs of travelling. One commented on how travelling is only part of their culture.

5.22 In relation to transit provision, whilst recognising the importance of having the transit provision in place within the study area and how some households with land spoke of being interested in developing transit provision, some form of negotiated stopping agreement was regarded by households as an effective way of meeting the transit needs of Gypsies and Travellers visiting the area and to minimise unauthorised encampments. This would involve caravans being sited at suitable locations for an agreed and limited period of time, with possible provision of limited services. Also, households residing permanently on sites would like to be able to accommodate visiting family and friends for an agreed period of time.

Accommodation need

5.23 Additional accommodation need derives from households residing on unauthorised pitches (including those that the respective council might have listed as tolerated, as tolerated is still unauthorised as it still does not have full planning status) or pitches with temporary planning permission requiring permanent permission; and households

residing on authorised sites requiring more space. The GTAA estimates the extent of need deriving from households residing in bricks and mortar accommodation. Households residing on sites and stakeholders commented on how it is important to determine this component of accommodation need.

5.24 Households with accommodation need stated their desire to stay with or close to family. No households residing on sites expressed an interest in residing in a house. Owners of sites with space to accommodate their own additional need are considering applying for planning permission to develop additional pitches.

5.25 Whilst there are waiting lists in relation to the local authority sites, this assessment does not include them in the calculation, as they are not reliable as those on the list could be already be included in the calculation in existing steps. Also, waiting lists are regarded as unreliable, as people might be on multiple waiting lists, including elsewhere in the country or still on the list, but no longer in need. However, according to East Sussex County Council data, as of November 2020, there were 26 households on waiting lists for pitches within the county consisting of 6 households from within the study area, 10 from outside the study area, and 10 with no fixed address. In terms of ethnicity, 16 of the households identify as Romany Gypsies, 5 as Irish Travellers, and 5 as New Travellers.

Requirement for residential pitches 2021-2026

5.26 The need for residential pitches in the study area is assessed according to a 15-step process, based on the model suggested in DCLG (2007) guidance and supplemented by data derived from the survey. The results of this are shown in Table 5.3 below, while the subsequent section contains explanations of the sourcing and calculation of figures for each step.

5.27 As discussed in Chapter 2, there are differing interpretations of the PPTS (August 2015) definition. As such, the needs assessment provides three accommodation needs figures: the first based on ethnic identity (‘Ethnic’ column); the second based on PPTS 2015 (‘PPTS’ column); and third, including the accommodation needs only of households who travel for work purposes (‘work’ column).

Table 5.3 Estimate of the need for permanent residential site pitches for the study area 2021-2026

	Ethnic	PPTS	Work
1) Current occupied permanent residential site pitches	76	76	76
Additional residential supply			
2) Number of unused residential pitches available	0	0	0
3) Number of existing pitches expected to become vacant through mortality	2	2	2
4) Net number of family units on sites expected to leave the area in next 5 years	0	0	0
5) Number of family units on sites expected to move into housing in next 5 years	0	0	0
6) Residential pitches planned to be built or to be brought back into use	2	2	2
Total Additional Supply	4	4	4
Additional residential need			
7) Seeking permanent permission from temporary sites	1	1	1
8) Family units (on pitches) seeking residential pitches in the area, excluding those counted as moving due to overcrowding in step 12	2	2	0
9) Family units on transit pitches requiring residential pitches in the area	0	0	0
10) Family units on unauthorised encampments requiring residential pitches	0	0	0
11) Family units on unauthorised developments requiring residential pitches	16	8	6
12) Family units currently overcrowded (or hidden family members) on pitches seeking residential pitches in the area, excluding those containing emerging family unit in step 8	0	0	0
13) Net new family units expected to arrive from elsewhere	0	0	0
14) New family formations expected to arise from within existing family units	9	5	2
15) Family units in housing but with a psychological aversion to housed accommodation	27	0	0
Total Need	55	16	9
Balance of Need and Supply			
Total Additional Pitch Requirement	51	12	5
Annualised Additional Pitch Requirement	10	2	1

Source: GTAA 2022

Requirement for residential pitches 2021-2026: steps of the calculation

5.28 Information from local authorities and the census plus evidence from the survey was used to inform the calculations including:

- The number of Gypsies and Travellers housed in bricks and mortar accommodation;
- The number of existing Gypsy and Traveller pitches;
- The number of families residing on unauthorised encampments requiring accommodation (and surveyed during the survey period);
- The number of unauthorised developments (during the survey period);
- The number of temporary pitches;
- The number of vacant pitches;
- The number of planned or potential new pitches; and
- The number of transit pitches.

5.29 The remainder of this chapter describes both the process and results of the Gypsy and Traveller accommodation needs calculations for the study area and for each of the commissioning local authorities.

Supply of pitches 2021-2026

5.30 Supply steps (steps 1 to 6) are the same irrespective of which definition of accommodation need used.

Step 1: Current occupied permanent site pitches

5.31 Based on information provided by the councils and corroborated by site visits and household surveys, there are currently 76 occupied authorised Gypsy and Traveller pitches in the study area.

Step 2: Number of unused residential pitches available

5.32 There are currently no vacant pitches within the study area.

Step 3: Number of existing pitches expected to become vacant between 2021 and 2026

5.33 This is calculated using mortality rates as applied in conventional Housing Needs Assessments. However, the figures for mortality have been increased in accordance with studies of Gypsy and Traveller communities suggesting a life expectancy approximately 10 years lower than that of the general population. This results in the supply of 2 pitches.

Step 4: Number of family units in site accommodation expressing a desire to leave the study area

5.34 None of the households surveyed as part of this GTAA stated that they would like to leave the study area. Also, there is no data regarding households who would like to migrate from outside the study area into it. As such, it is usual to determine both in-and out-migration as zero.

Step 5: Number of family units in site accommodation expressing a desire to reside in housing

5.35 This is determined by survey data. It was assumed that all those currently residing on sites planning to move into housing in the next five years (step 5), or preferring to move into housing from an overcrowded pitch (step 11), would be able to do so. This resulted in a supply of no pitches.

Step 6: Residential pitches planned to be built or brought back into use between 2021 and 2026

5.36 This is determined by local authority data and from an assessment of sites during visits. Such pitches are referred to as 'potential'. This means that the pitches have been granted planning permission but have not yet been developed. Potential pitches include those which have been partly developed or which were previously occupied but are currently not occupied and in need of redevelopment. There are two pitches in the study area (Rother) that are expected to be built or brought back into use during the period 2021-2026.

Need for pitches 2021-2026

5.37 As discussed in Chapter 2, this needs assessment provides three accommodation needs figures: the first based on ethnic identity ('Ethnic' column); the second based on PPTS 2015 ('PPTS' column); and the third that includes the accommodation needs only of households who travel for work purposes ('work' column).

Step 7: Seeking permanent permission from temporary sites

5.38 This is determined by local authority data. It is assumed that families residing on pitches whose planning permission expires within the period 2021-2026 will still require accommodation within the study area. There is currently 1 pitch with temporary planning permission located in the study area. This generates a total need in the study area of 1 pitch ('ethnic'), 1 pitch ('PPTS'), and 1 pitch ('work').

Step 8: Family units on pitches seeking residential pitches in the study area between 2021 and 2026

5.39 This is determined by survey data. These family units reported that they 'needed or were likely' to move to a different home in the next five years, and wanted to stay on an authorised site, or that they were currently seeking accommodation.

5.40 This category of accommodation need overlaps with those moving due to overcrowding, counted in step 12, and so any family units which both are overcrowded and seeking accommodation are deducted from this total. This generates a total need in the study area of 2 pitches ('ethnic'), 0 pitches ('PPTS'), and 0 pitches ('work').

Step 9: Family units on transit pitches seeking residential pitches in the study area between 2021 and 2026

5.41 This is determined by survey data. These family units did not report requiring permanent pitches within the study area in the next five years. There was zero need resulting from this source.

Step 10: Family units on unauthorised encampments seeking residential pitches in the study area

5.42 Government guidance (DCLG 2007) indicates that we should considered whether alternative accommodation is required for families residing on unauthorised encampments. Please note that only Gypsies and Travellers requiring permanent accommodation within the study area have been included in this calculation – transiting Gypsies and Travellers are included in separate calculations (step 9). Data concerning unauthorised encampments with need was gathered via consultation with the East Sussex County Council Gypsy and Traveller Team. However, as there is insufficient data to confirm level of need for permanent accommodation within the study area or any specific local authority, the need from this source is considered to be "zero", and it is recommended that the local authorities consider meeting any need that might materialise throughout the period of the Local Plan from unauthorised encampments through a windfall policy.

Step 11: Family units on unauthorised developments seeking residential pitches in the area

5.43 This was determined by consultation data. The guidance also indicates that the accommodation needs of families living on unauthorised developments for which planning permission is not expected must be considered. Regularising families living on their land without planning permission would reduce the overall level of need by the number of pitches given planning permission. All unauthorised developments whose existence were confirmed by visiting them and via consultation with stakeholders, are taken into account in the needs calculation, irrespective of access to households. There is a need of 16 pitches deriving from unauthorised developments in the study area. This generates a total need in the study area of 16 pitches ('ethnic'), 8 pitches ('PPTS'), and 6 pitches ('work').

Step 12: Family units on overcrowded pitches seeking residential pitches in the area

5.44 This was determined by the consultation. Households which also contain a newly formed family unit that has not yet left are excluded. This is because it is assumed that once the extra family unit leaves (included in the need figures in step 14) their accommodation will no longer be overcrowded. The calculations suggest that the need for additional pitches in the study area to resolve overcrowding over the period 2021-

2026 are as follows: 0 pitches ('ethnic definition'), 0 pitches ('PPTS' definition), and 0 pitches ('travel to work' definition).

Step 13: New family units expected to arrive from elsewhere

5.45 In the absence of any data derivable from primary or secondary sources (beyond anecdotal evidence) on the moving intentions of those outside the study area moving into the area, as in the case of those moving out of the area, it is assumed that the inflow of Gypsies and Travellers into the area will be equivalent to the outflow. Together, these amount to a net inflow of 0 units in the study area. However, it is recommended that the local authorities consider meeting any in-migration that might materialise throughout the period of the Local Plan through a windfall policy.

Step 14: New family formations expected to arise from within existing family units on sites

5.46 The number of individuals needing to leave pitches to create new family units within the period 2021-2026 was estimated from consultation and excludes those included in steps 8, 12 and 13. This will result in the formation of 9 new households requiring residential pitches over the period 2021-2026 ('ethnic definition'), 5 pitches ('PPTS' definition) and 2 pitches ('work' definition).

Step 15: Family units in housing with a psychological aversion to housed accommodation

5.47 Whilst not a medical condition, 'psychological aversion' is a term that is accepted as part of accommodation assessments in encapsulating a range of factors that demonstrate an aversion to residing in bricks and mortar accommodation (see DCLG October 2007)[30]. The factors concerned can include feelings of depression, stress, sensory deprivation, feeling trapped, feeling cut off from social contact, a sense of dislocation with the past, feelings of claustrophobia. Proven psychological aversion to residing in bricks and mortar accommodation is one factor used to determine accommodation need.

5.48 This was determined firstly by estimating the number of houses occupied by Gypsies and Travellers. Work undertaken by Shelter (2005) estimates that between one-half to two-thirds of the Gypsy and Traveller population reside in bricks and mortar accommodation. From previous GTAAs undertaken by *RRR Consultancy Ltd*, it is estimated that around 10% of Gypsies and Travellers residing in bricks and mortar accommodation experience psychological aversion and require accommodating on

[30] DCLG, Consultation on revised planning guidance in relation to Travelling Showpeople, January 2007.

sites. This was based on previous GTAAs undertaken by *RRR Consultancy* including Central Lincolnshire (2013 and 2020), East Staffordshire and Derbyshire GTAA (2015), South Kesteven and Rutland (2016), and Bassetlaw (2019). Local Plan examinations already undertaken have found these GTAAs to be sound.

5.49 As stated in Table 3.2 (page 39), there were 351 Gypsy and Traveller households recorded by the 2011 Census. Table 5.4 shows the number of authorised pitches in each local authority area (including those with permanent and temporary planning permission). The number of households whose accommodation needs derives from psychological aversion is determined by applying a 10% multiplier to the difference between the number of households recorded by the 2011 Census and number residing on authorised pitches as determined by the 2021 GTAA.

Table 5.4 Accommodation need deriving from psychological aversion

	Households 2011	Pitches on auth. sites	Households less pitches	10%	Rounded
Eastbourne	26	0	26	2.6	3
Hastings	63	0	63	6.3	6
Lewes	31	3	28	2.8	3
Rother	42	14	28	2.8	3
SDNPA	72	49	23	2.3	2
Wealden	117	16	101	10.1	10
Total	351	82	269	26.9	27

Source: GTAA 2022

5.50 Based on consultation with stakeholders and the Gypsies and Travellers in the study area, half of households are likely to travel of which half are likely to travel for work purposes. This results in ethnic based need of 27 pitches, PPTS need of 15 pitches and a work-based need of 6 pitches. As neither Eastbourne nor Hastings have any known sites, the accommodation need for these two authorities are based on the accommodation need stemming from those living in bricks and mortar. For example, according to 2011 census data, there are 26 households identified as Gypsies and Travellers living in bricks and mortar in Eastbourne. As there are no sites within Eastbourne, the estimated need is based on 10% of the 26. This results in an accommodation need on sites of 3 based on ethnic identity.

5.51 There is insufficient evidence to confirm the proportion of households residing in bricks and mortar accommodation in each study area local authority who meet the PPTS or 'work' definitions. As such, the need arising from those households residing in bricks and mortar is assessed only in relation to households who identify ethnically as Gypsies and Travellers, but not in relation to those who may meet the PPTS or work definitions. It is recommended that the local authorities consider meeting any need that might materialise from those living in houses throughout the period of the Local Plan through a windfall policy.

Balance of Need and Supply

5.52 From the above, the Total Additional Pitch Requirement is calculated by deducting the supply from the need.

Table 5.5 Summary of Gypsy and Traveller pitch needs 2021-26

	Ethnic	PPTS	Work
Supply	4	4	4
Need	55	16	9
Difference	51	12	5

Source: GTAA 2022

Requirement for residential pitches 2021-2026 per authority

5.53 The following tables break down the supply and need for each of the local authorities which form the study area:

Table 5.6 Estimate of the need for permanent residential site pitches 2021-2026 (Eastbourne)

	Ethnic	PPTS	Work
1) Current occupied permanent residential site pitches	0	0	0
Additional residential supply			
2) Number of unused residential pitches available	0	0	0
3) Number of existing pitches expected to become vacant through mortality	0	0	0
4) Net number of family units on sites expected to leave the area in next 5 years	0	0	0
5) Number of family units on sites expected to move into housing in next 5 years	0	0	0
6) Residential pitches planned to be built or to be brought back into use	0	0	0
Total Additional Supply	0	0	0
Additional residential need			
7) Seeking permanent permission from temporary sites	0	0	0
8) Family units (on pitches) seeking residential pitches in the area, excluding those counted as moving due to overcrowding in step 12	0	0	0
9) Family units on transit pitches requiring residential pitches in the area	0	0	0
10) Family units on unauthorised encampments requiring residential pitches	0	0	0
11) Family units on unauthorised developments requiring residential pitches	0	0	0
12) Family units currently overcrowded (or hidden family members) on pitches seeking residential pitches in the area, excluding those containing emerging family unit in step 8	0	0	0
13) Net new family units expected to arrive from elsewhere	0	0	0
14) New family formations expected to arise from within existing family units	0	0	0
15) Family units in housing but with a psychological aversion to housed accommodation	3	0	0
Total Additional Need	3	0	0
Balance of Need and Supply			
Total Additional Pitch Requirement	3	0	0
Annualised Additional Pitch Requirement	1	0	0

Source: GTAA 2022

Table 5.7 Estimate of the need for permanent residential site pitches 2021-2026 (Hastings)

	Ethnic	PPTS	Work
1) Current occupied permanent residential site pitches	0	0	0
Additional residential supply			
2) Number of unused residential pitches available	0	0	0
3) Number of existing pitches expected to become vacant through mortality	0	0	0
4) Net number of family units on sites expected to leave the area in next 5 years	0	0	0
5) Number of family units on sites expected to move into housing in next 5 years	0	0	0
6) Residential pitches planned to be built or to be brought back into use	0	0	0
Total Additional Supply	0	0	0
Additional residential need			
7) Seeking permanent permission from temporary sites	0	0	0
8) Family units (on pitches) seeking residential pitches in the area, excluding those counted as moving due to overcrowding in step 12	0	0	0
9) Family units on transit pitches requiring residential pitches in the area	0	0	0
10) Family units on unauthorised encampments requiring residential pitches	0	0	0
11) Family units on unauthorised developments requiring residential pitches	3	2	2
12) Family units currently overcrowded (or hidden family members) on pitches seeking residential pitches in the area, excluding those containing emerging family unit in step 8	0	0	0
13) Net new family units expected to arrive from elsewhere	0	0	0
14) New family formations expected to arise from within existing family units	0	0	0
15) Family units in housing but with a psychological aversion to housed accommodation	6	0	0
Total Need	9	2	2
Balance of Need and Supply			
Total Additional Pitch Requirement	9	2	2
Annualised Additional Pitch Requirement	2	0	0

Source: GTAA 2022

Table 5.8 Estimate of the need for permanent residential site pitches 2021-2026 (Lewes)

	Ethnic	PPTS	Work
1) Current occupied permanent residential site pitches	3	3	3
Additional residential supply			
2) Number of unused residential pitches available	0	0	0
3) Number of existing pitches expected to become vacant through mortality	0	0	0
4) Net number of family units on sites expected to leave the area in next 5 years	0	0	0
5) Number of family units on sites expected to move into housing in next 5 years	0	0	0
6) Residential pitches planned to be built or to be brought back into use	0	0	0
Total Additional Supply	0	0	0
Additional residential need			
7) Seeking permanent permission from temporary sites	0	0	0
8) Family units (on pitches) seeking residential pitches in the area, excluding those counted as moving due to overcrowding in step 12	0	0	0
9) Family units on transit pitches requiring residential pitches in the area	0	0	0
10) Family units on unauthorised encampments requiring residential pitches	0	0	0
11) Family units on unauthorised developments requiring residential pitches	0	0	0
12) Family units currently overcrowded (or hidden family members) on pitches seeking residential pitches in the area, excluding those containing emerging family unit in step 8	0	0	0
13) Net new family units expected to arrive from elsewhere	0	0	0
14) New family formations expected to arise from within existing family units	0	0	0
15) Family units in housing but with a psychological aversion to housed accommodation	3	0	0
Total Need	3	0	0
Balance of Need and Supply			
Total Additional Pitch Requirement	3	0	0
Annualised Additional Pitch Requirement	0	0	0

Source: GTAA 2022

Table 5.9 Estimate of the need for permanent residential site pitches 2021-2026 (Rother)

	Ethnic	PPTS	Work
1) Current occupied permanent residential site pitches	17	17	17
Additional residential supply			
2) Number of unused residential pitches available	0	0	0
3) Number of existing pitches expected to become vacant through mortality	1	1	1
4) Net number of family units on sites expected to leave the area in next 5 years	0	0	0
5) Number of family units on sites expected to move into housing in next 5 years	0	0	0
6) Residential pitches planned to be built or to be brought back into use	2	2	2
Total Additional Supply	3	3	3
Additional residential need			
7) Seeking permanent permission from temporary sites	0	0	0
8) Family units (on pitches) seeking residential pitches in the area, excluding those counted as moving due to overcrowding in step 12	1	1	0
9) Family units on transit pitches requiring residential pitches in the area	0	0	0
10) Family units on unauthorised encampments requiring residential pitches	0	0	0
11) Family units on unauthorised developments requiring residential pitches	8	4	4
12) Family units currently overcrowded (or hidden family members) on pitches seeking residential pitches in the area, excluding those containing emerging family unit in step 8	0	0	0
13) Net new family units expected to arrive from elsewhere	0	0	0
14) New family formations expected to arise from within existing family units	3	2	1
15) Family units in housing but with a psychological aversion to housed accommodation	3	0	0
Total Need	15	7	3
Balance of Need and Supply			
Total Additional Pitch Requirement	12	4	2
Annualised Additional Pitch Requirement	2	1	0

Source: GTAA 2022

Table 5.10 Estimate of the need for permanent residential site pitches 2021-2026 (SDNPA)

	Ethnic	PPTS	Work
1) Current occupied permanent residential site pitches	7	7	7
Additional residential supply			
2) Number of unused residential pitches available	0	0	0
3) Number of existing pitches expected to become vacant through mortality	0	0	0
4) Net number of family units on sites expected to leave the area in next 5 years	0	0	0
5) Number of family units on sites expected to move into housing in next 5 years	0	0	0
6) Residential pitches planned to be built or to be brought back into use	0	0	0
Total Additional Supply	0	0	0
Additional residential need			
7) Seeking permanent permission from temporary sites	0	0	0
8) Family units (on pitches) seeking residential pitches in the area, excluding those counted as moving due to overcrowding in step 12	0	0	0
9) Family units on transit pitches requiring residential pitches in the area	0	0	0
10) Family units on unauthorised encampments requiring residential pitches	0	0	0
11) Family units on unauthorised developments requiring residential pitches	0	0	0
12) Family units currently overcrowded (or hidden family members) on pitches seeking residential pitches in the area, excluding those containing emerging family unit in step 8	0	0	0
13) Net new family units expected to arrive from elsewhere	0	0	0
14) New family formations expected to arise from within existing family units	0	0	0
15) Family units in housing but with a psychological aversion to housed accommodation	2	0	0
Total Need	2	0	0
Balance of Need and Supply			
Total Additional Pitch Requirement	2	0	0
Annualised Additional Pitch Requirement	0	0	0

Source: GTAA 2022

Table 5.11 Estimate of the need for permanent residential site pitches 2021-2026 (Wealden)

	Ethnic	PPTS	Work
1) Current occupied permanent residential site pitches	49	49	49
Additional residential supply			
2) Number of unused residential pitches available	0	0	0
3) Number of existing pitches expected to become vacant through mortality	1	1	1
4) Net number of family units on sites expected to leave the area in next 5 years	0	0	0
5) Number of family units on sites expected to move into housing in next 5 years	0	0	0
6) Residential pitches planned to be built or to be brought back into use	0	0	0
Total Additional Supply	1	1	1
Additional residential need			
7) Seeking permanent permission from temporary sites	1	1	1
8) Family units (on pitches) seeking residential pitches in the area, excluding those counted as moving due to overcrowding in step 12	1	1	0
9) Family units on transit pitches requiring residential pitches in the area	0	0	0
10) Family units on unauthorised encampments requiring residential pitches	0	0	0
11) Family units on unauthorised developments requiring residential pitches	6	3	1
12) Family units currently overcrowded (or hidden family members) on pitches seeking residential pitches in the area, excluding those containing emerging family unit in step 8	0	0	0
13) Net new family units expected to arrive from elsewhere	0	0	0
14) New family formations expected to arise from within existing family units	5	2	0
15) Family units in housing but with a psychological aversion to housed accommodation	10	0	0
Total Need	23	7	2
Balance of Need and Supply			
Total Additional Pitch Requirement	22	6	1
Annualised Additional Pitch Requirement	5	1	0

Source: GTAA 2022

Requirement for residential pitches 2026-2040

5.54 Considering future accommodation need, it is assumed that those families with need stemming from psychological aversion to residing in houses, overcrowding, unauthorised developments and encampments will move onto sites within a 5-year period. As such, only natural population increases (same as step 15 above), mortality, and movement into and out of the study area accommodation need to be considered. The base figures regarding the number of pitches on sites at the end of the first 5-year period are shown in Table 5.12 below. Please note that the 2021 base figures include both authorised occupied and vacant pitches, whilst the 2026 base figures assume that any potential pitches have already been developed.

5.55 The 2026 pitch base figures are determined by a number of factors including:

- the number of occupied pitches in 2021 (as determined by the household survey);
- the number of vacant pitches in 2021 (as determined by the household survey);
- the number of potential pitches (as determined by local authority data); and
- accommodation need for the period 2021-2026 (as determined by the GTAA).

5.56 In relation to the accommodation needs based on the ethnic identity definition, the 2026 base data is determined by:

Ethnic Based

- Occupied authorised pitches in 2021 (76) + vacant pitches (0) + potential pitches (4) + additional needs 2021-2026 (51) = 131 pitches.

PPTS Based

- Occupied authorised pitches in 2021 (76) + vacant pitches (0) + potential pitches (4) + additional needs 2021-2026 (12) = 92 pitches.

Work Based

- Occupied authorised pitches in 2021 (76) + vacant pitches (0) + potential pitches (4) + additional needs 2021-2026 (5) = 85 pitches.

5.57 It is assumed that by 2026, vacant pitches will be occupied, potential pitches will have been developed and occupied, and any additional need will have been met by new supply.

Table 5.12 Base figures for pitches as of 2026 assuming all need is met for 2021 2026

	2021 Base	Vacant	Potentials 2021-25	Need 2021-25	2026 Base
Ethnic	76	0	4	51	131
PPTS	76	0	4	12	92
Work	76	0	4	5	85

Source: GTAA 2022

5.58 In March 2014, Brandon Lewis (Parliamentary Under Secretary of State within the Department for Communities and Local Government) confirmed that the 3% household growth rate for Gypsy and Traveller households does not represent national planning policy. Alternatively, it is suggested that an annual household growth rate of between 1.5% and 3% is more appropriate.

5.59 In relation to this accommodation assessment, analysis of the current population indicates that an annual household growth rate of 3.25% per annum (compound) equating to a 5-year rate of 17.3% is more appropriate. This is based on an analysis of various factors derived from the surveys including current population numbers, the average number of children per household, and marriage rates. It is assumed that these rates are likely to continue during the period 2026-2040.

5.60 The following steps outline how the accommodation need for the study area for the periods 2026-2031, 2031-2036 and 2036-2040. Followed by the results of the calculations, firstly for the study area as a whole and then per authority.

Supply of pitches

Occupied authorised pitches
+ pitches expected to become vacant due to mortality
+ number of family units on pitches expected to move out of the area
= Total Additional Supply

Additional need for pitches

Family units moving into the study area (100% of outflow)
+ newly forming family units
= Total Additional Need

Table 5.13: Summary of accommodation needs 2021-40 (pitches) (Study Area)

Period	Ethnic definition	PPTS 2015 definition	Work definition
Total 2021-26	51	12	5
Total 2026-31	16	13	11
Total 2031-36	18	16	14
Total 2036-40	18	14	13
Total 2021-40	103	55	43

Source: GTAA 2022

Table 5.14: Summary of accommodation needs 2021-40 (pitches) (Eastbourne)

Period	Ethnic definition	PPTS 2015 definition	Work definition
Total 2021-26	3	0	0
Total 2026-31	0	0	0
Total 2031-36	0	0	0
Total 2036-40	0	0	0
Total 2021-40	3	0	0

Source: GTAA 2022

5.61 Eastbourne has no proposed land supply. As such, its identified accommodation need remains the same as above.

Table 5.15: Summary of accommodation needs 2021-40 (pitches) (Hastings)

Period	Ethnic definition	PPTS 2015 definition	Work definition
Total 2021-26	9	2	2
Total 2026-31	1	0	0
Total 2031-36	1	0	0
Total 2036-40	1	0	0
Total 2021-40	12	2	2

Source: GTAA 2022

5.62 Hastings has a proposed a 2-pitch site in its land supply which if utilised to meet accommodation need would result in the following:

Table 5.16: Summary of accommodation needs 2021-40 (pitches) (Hastings)

Period	Ethnic definition	PPTS 2015 definition	Work definition
Total 2021-26	7	0	0
Total 2026-31	1	0	0
Total 2031-36	1	0	0
Total 2036-40	1	0	0
Total 2021-40	10	0	0

Source: GTAA 2022

Table 5.17: Summary of accommodation needs 2021-40 (pitches) (Lewes)

Period	Ethnic definition	PPTS 2015 definition	Work definition
Total 2021-26	3	0	0
Total 2026-31	1	1	1
Total 2031-36	1	1	1
Total 2036-40	1	1	1
Total 2021-40	6	3	3

Source: GTAA 2022

5.63 Lewes has a proposed 5-pitch site in its land supply which if utilised to meet accommodation need would result in the following:

Table 5.18: Summary of accommodation needs 2021-40 (pitches) (Lewes)

Period	Ethnic definition	PPTS 2015 definition	Work definition
Total 2021-26	0	0	0
Total 2026-31	0	0	0
Total 2031-36	0	0	0
Total 2036-40	1	0	0
Total 2021-40	1	0	0

Source: GTAA 2022

Table 5.19: Summary of accommodation needs 2021-40 (pitches) (Rother)

Period	Ethnic definition	PPTS 2015 definition	Work definition
Total 2021-26	12	4	2
Total 2026-31	4	3	3
Total 2031-36	5	5	4
Total 2036-40	5	4	4
Total 2021-40	26	16	13

Source: GTAA 2022

5.64 Rother has a proposed land supply of 4 pitches across two sites which if utilised to meet accommodation need would result in the following:

Table 5.20: Summary of accommodation needs 2021-40 (pitches) (Rother)

Period	Ethnic definition	PPTS 2015 definition	Work definition
Total 2021-26	8	0	0
Total 2026-31	4	3	1
Total 2031-36	5	5	4
Total 2036-40	5	4	4
Total 2021-40	22	12	9

Source: GTAA 2022

Table 5.21: Summary of accommodation needs 2021-40 (pitches) (SDNPA)

Period	Ethnic definition	PPTS 2015 definition	Work definition
Total 2021-26	2	0	0
Total 2026-31	1	1	1
Total 2031-36	1	1	1
Total 2036-40	1	1	1
Total 2021-40	5	3	3

Source: GTAA 2022

5.65 SDNP has no proposed land supply to meet the accommodation needs of Gypsies and Travellers. As such, its identified accommodation need remains the same as above.

Table 5.22: Summary of accommodation needs 2021-40 (pitches) (Wealden)

Period	Ethnic definition	PPTS 2015 definition	Work definition
Total 2021-26	22	6	1
Total 2026-31	9	8	6
Total 2031-36	10	9	8
Total 2036-40	10	9	7
Total 2021-40	51	32	22

Source: GTAA 2022

5.66 Wealden currently has no proposed land supply. The Council will consider new sites and extensions to existing sites as part of its new Local Plan process. As such, its identified accommodation need remains the same as above.

Requirements for transit pitches / negotiated stopping arrangements

5.67 Analysis of data in Chapter 3 shows that 137 unauthorised encampments took place in the study area during the period 2017/18 to the first half of 2020/21. On average, only a third (33%) of the 9 pitches at the Bridies Tan transit site were occupied at any one time. The under-occupation of the Bridies Tan transit site may be due to: Gypsy and Traveller households not being aware of the site; households preferring not to use it; or it is situated in a location not suitable for all households. As such, there may be a need for additional transit provision in each of the local authority areas. The data analysed in Chapter 3 shows that there is a fairly even spread of unauthorised encampments taking place throughout the study area between 2017/18 to 2020/21 ranging from 17% occurring in Eastbourne to 26% taking placed in Lewes. On average, 34 unauthorised encampments took place in the study area each year.

5.68 However, there is insufficient evidence to determine the number of additional transit pitches required. As such, it is recommended that the local authorities keep more detailed records of unauthorised encampments e.g. the number of vehicles involved and length of stay, to help determine need. Additional transit provision could be met through a windfall or criteria-based policy.

5.69 It is also recommended that all of the local authorities within the study area adopt a negotiated stopping policy. This involves caravans being sited at a suitable location for an agreed and limited period of time, and if necessary, with the provision of services such as waste disposal and toilets. Whilst it is recommended that all local authorities adopt the negotiated stopping place policy, it could be implemented on an individual local authority, across the study area, or countywide basis.

5.70 The term 'negotiated stopping' is used to describe agreed short-term provision for transient Gypsies and Travellers. Caravans on negotiated stopping places are allowed to stay for an agreed amount of time. This could be on private or public land providing the encampment does not cause any danger, problems or nuisance to its occupants or local community. The arrangement is between the local authority, police, the transient households (and landowner if situated on privately owned land).

5.71 The location of a negotiated stopping place could be where the transient household is located at the time they are identified. If not appropriate, the household could be moved on to an appropriate alternative location. It is important for local authorities to respond to the temporary accommodation needs of transiting households within the local authority area. Also, local authorities should consider allowing households visiting family or friends who reside on permanent sites in the local authority area to temporarily reside on the site for an agreed amount of time.

Summary

5.72 This chapter has provided both quantitative and qualitative data regarding key characteristics of respondent households residing on Gypsy and Traveller sites. Accommodation needs resulting from the calculations in the tables above for the study area and the six constituent planning authorities.

6. Travelling Showpeople consultation

Introduction

6.1 As described in Chapter 1, this assessment considers the accommodation needs of Travelling Showpeople. Unlike Gypsies and Travellers, Travelling Showpeople are not considered to be an ethnic minority and, as such, are not protected by the Equality Act 2010. Nonetheless, national planning policy (PPTS 2015) requires local authorities to consider the accommodation needs of Travelling Showpeople families. As such, they have been included in this report.

Methodology

6.2 There is one known yard in the study area, in Wealden. The yard was identified through consultation with the Showmen's Guild of Great Britain and the Association of Circus Proprietors of Great Britain and during visits to Gypsy and Traveller sites, but it was not possible to have a discussion with the household at the time of consultation as there was no one available at the time. However, the Guild have confirmed the occupancy and that it is an extended family.

Accommodation need

6.3 The need for permanent plots for Showpeople in the study area is based on the model suggested in DCLG (2007) guidance and supplemented by data provided by the local authorities. It provides a calculation of accommodation need for the period of 2021-2040 in 5-year periods.

6.4 As discussed in Chapter 2, there are differing interpretations of the PPTS (August 2015) definition of Travelling Showpeople. However, as all households travel and all meet both the PPTS definition and the work interpretation, only one needs figure is provided. It was confirmed that there is no known additional need, however, if the family on the existing yard were to need additional plots, there is space on and adjoining the existing yard to accommodate any such need, subject to planning constraints on site.

Requirement for plots 2021-2026

6.5 The need for permanent plots for Showpeople in the study area is based on the model suggested in DCLG (2007) guidance and follows the first fourteen steps as that used when assessing Gypsies and Travellers but does not include step 15 (psychological aversion) as this is not recognised in the same way in relation to Showpeople as it is with Gypsies and Travellers. It provides a calculation of accommodation need for the period of 2021-2040 in 5-year periods.

Requirement for Showpeople Plots 2026-2040

6.6 Considering future accommodation need, it is assumed that those families with need stemming from psychological aversion to residing in houses, overcrowding, unauthorised developments and encampments will move onto yards within a 5-year period. As such, only natural population increase (same as step 14 above), mortality, and movement into and out of the study area need to be considered. The base figures regarding the number of plots on yards at the end of the first 5-year period are shown in Table 6.1 below. Please note that the 2021 base figures include both authorised occupied and vacant plots, whilst the 2026 base figures assume that any potential plots have been developed.

6.7 The 2026 pitch base figures are determined by a number of factors including:

- the number of occupied plots in 2021
- the number of vacant plots in 2021
- the number of potential plots; and
- accommodation need for the period 2021-2026.

6.8 It is calculated as follows:

- Occupied plots in 2021 (4) + vacant plots (0) + potential plots (0) + additional needs 2021-2026 (0) = 4 plots.

6.9 It is assumed that by 2026 vacant plots will be occupied, potential plots will have been developed and occupied, and any additional need has been met by new supply.

Table 6.1 Base figures for plots as of 2026 assuming all need is met for 2021-2026

2021 Base	Vacant	Potentials 2021-26	Need 2021-26	2026 Base
4	0	0	0	4

Source: ANA 2021

6.10 There is no data regarding the household composition of Showpeople residing on plots. As such, the same population growth rate relating to Gypsy and Traveller households has been applied i.e. 17.3% over each of the 5-year periods (2026-2031, 2031-2036, and 2036-2040). This results in a need of 3 plots over the period 2021-2040 (1 plot in each of the 5-year periods).

Requirements for transit provision: 2021-2040

6.11 Whilst there is no evidence of unauthorised encampments being undertaken by Travelling Showpeople, there is still a need to consider their transit needs. This could

include allowing households to reside at an agreed location for a specified length of time, prior to, and after, hosting fairs or events.

Summary

6.12 This chapter has provided both quantitative and qualitative data regarding key characteristics of respondent households residing on Travelling Showpeople plots. Accommodation need resulting from the calculations in the tables above are as follows:

Table 6.2: Summary of Accommodation Needs 2021-40 (plots) (Study Area)

Total 2021-26	0
Total 2026-31	1
Total 2031-36	1
Total 2036-40	1
Total 2021-40	3

Source: GTAA 2022

7. Boat Dwellers Consultation

Introduction

7.1 As described in Chapter 1, this GTAA considers the accommodation needs of boat dwellers. Unlike Gypsies and Travellers, boat dwellers are not considered to be an ethnic minority and as such, are not protected by the Equality Act 2010. Nonetheless, government guidance (DCLG 2016) indicates that local authorities should consider the accommodation needs of boat dweller families. Given the presence of boat dwellers in the study area, they have been included in this report.

7.2 Due to Covid-19 restrictions, it was not possible to visit and consult directly with all boat dwellers in the study area. The data gathered for the assessment of accommodation need was subsequently based on consultation with key stakeholders including local authority officers, representatives from the National Bargee Traveller Association (NBTA), representatives from the Canal and River Trust (CRT), and managers and owners of the local boat yards and marinas. This enabled the data gathered to be provided by key representatives (and in some cases members) of the local boat dweller and traveller community who have expert knowledge and insight into the community within the study area. The consultation determined the number of authorised and unauthorised permanent and transit moorings; the number of occupied and vacant moorings; the characteristics of the boat dwellers; and the need for permanent and transit moorings.

Characteristics

7.3 It has been estimated from the consultation that there are no recorded or identified residential moorings in the study area. The registered moorings in the area are for leisure moorings on local marinas and boat yards. Marinas and yards are privately owned and managed. The main marina in the study area Sovereign Harbour in Eastbourne, previously managed moorings for permanent boat dwellers. However, it has since implemented a policy whereby moorings are rented on an annual basis, although they can only be occupied for 30 days in every three months. However, they also manage the Brighton marina which does allow people to reside permanently on boats. These are the only known moorings which allow residents to permanently reside in boats situated close to the study area.

7.4 According to stakeholders, people who use the boats for long periods of time tend to vary between those who live on the boats during the week so that they can be close to work or educational locations (college or university), and go home at weekends, and those who live elsewhere in the week and live on the boats at weekends and for holidays.

7.5 Current provision within the study area focuses on leisure cruisers and space for the storage and maintenance of boats. There are reports of people permanently residing on boats, but not in need of permanent moorings. There is more of a need for flexible transit moorings which allow people to travel waterways and to stop at places for agreed periods of time as and when required.

7.6 The waterways inland are very limited in terms of being navigable and/or suitable for moorings. Those who do reside on boats are primarily 'constant cruisers' with minimal need of permanent moorings. There are an unknown number of boat dwellers residing on boats at the end of gardens and fields with the consent of the landowners, but these do not always have planning permission.

Accommodation need

7.7 Whilst many of the boat dwellers who permanently reside on boats due to the desire for an alternative lifestyle, some do so due to a lack of alternative affordable accommodation. The cost of buying or renting housing in the study area was regarded by stakeholders as leading to boat dwelling as an affordable alternative. It was also suggested that there is a lack of available and affordable moorings on the waterways and a lack of suitable locations for further moorings. There is a lack of areas that are safe for moorings to be located due to unsuitable locations with appropriate banksides to develop moorings and safe waterway locations. Also, mooring locations were regarded as being restricted by land ownership and places not being made available for moorings to be developed.

7.8 Stakeholders stated that whilst there is need for additional moorings in the study area, potential locations for new moorings are limited. Stakeholders highlighted the importance of the study area local authorities working closely with the CRT, Environment Agency and representative organisations such as the National Bargee Traveller Association (NBTA) to address accommodation need. It was suggested that instead of more permanent moorings, boat dwellers who permanently reside on boats could be provided with permits, which would enable them to moor at agreed locations for agreed periods of time. This approach is similar to a method recommended by the NBTA and used in areas such as Cambridge City.

Requirement for residential moorings 2021-2040

7.9 There is a lack of evidence regarding the need for additional permanent moorings and limited potential locations. As such, it is recommended that the study area local authorities work together alongside the CRT, EA, marinas and the NBTA to develop a shared protocol permitting boat dwellers who permanently reside on boats to moor at agreed locations for agreed periods of time. However given the evidence above, it is not considered that is a permanent future need for moorings between 2021 and 2040.

Requirements for transit moorings: 2021-2040

7.10 From the consultation with stakeholders, there is evidence of need for more moorings to assist those who are travelling across the area. Constant cruisers in particular have need for additional and more flexible transit moorings. Some spoke of how the study areas local authorities need to work closely with waterways management teams and organisations such as NBTA to ensure that sufficient provisions are made available in the area.

Summary

7.11 This chapter has provided qualitative data regarding key characteristics of households residing permanently on residential moorings. Current boat dwellers consist of 'constant cruisers' who do not require permanent moorings and boat dwellers who reside permanently on boats and require permanent, authorised moorings.

7.12 There is a lack of navigable waterways within the study area and few suitable locations for moorings. Consultation with stakeholders suggests that there is accommodation need for boat dwellers residing in the study area. However, a lack of evidence means that it is difficult to quantify the need. As such, the GTAA recommends that accommodation need for boat dwellers is met as it arises and considered on a case-by-case basis.

8. Conclusion and Recommendations

Introduction

8.1 This final chapter draws conclusions from the evidence base above. It then makes a series of recommendations relating to meeting the identified need for new provision, facilities, and recording and monitoring processes.

8.2 The chapter begins by presenting an overview of the policy changes, followed by review of the needs and facilitating the needs of Gypsy and Traveller sites. As previously discussed, this report focusses on the assessment of accommodation need for Gypsies and Travellers, Travelling Showpeople and Boat Dwellers.

8.3 The accommodation needs calculations undertaken as part of this GTAA was based on the analysis of both secondary data and primary consultation with Gypsies and Travellers, key stakeholders and site owners and managers. The consultation was undertaken in a Covid-19 safe manner (i.e. it followed government guidance and restrictions). However, this meant that the consultation with households was delayed and some consultation was undertaken using remote methods (e.g. over the telephone).

Accommodation need

8.4 The following tables outline the accommodation need for different groups for the Local Plan period of 2021 to 2040 for the study area for each local authority.

Gypsies and Travellers

Table 8.1: Summary of accommodation needs 2021-40 (pitches) (Study Area)

Period	Ethnic definition	PPTS 2015 definition	Work definition
Total 2021-26	51	12	5
Total 2026-31	18	13	11
Total 2031-36	20	16	14
Total 2036-40	18	14	13
Total 2021-40	107	55	43

Source: GTAA 2022

Table 8.2: Summary of accommodation needs 2021-40 (pitches) (Eastbourne)

Period	Ethnic definition	PPTS 2015 definition	Work definition
Total 2021-26	3	0	0
Total 2026-31	0	0	0
Total 2031-36	0	0	0
Total 2036-40	0	0	0
Total 2021-40	3	0	0

Source: GTAA 2022

8.5 Eastbourne has no proposed land supply. As such, its identified accommodation need remains the same as above.

Table 8.3: Summary of accommodation needs 2021-40 (pitches) (Hastings)

Period	Ethnic definition	PPTS 2015 definition	Work definition
Total 2021-26	9	2	2
Total 2026-31	1	0	0
Total 2031-36	1	0	0
Total 2036-40	1	0	0
Total 2021-40	12	2	2

Source: GTAA 2022

8.6 Hastings has a proposed a 2-pitch site in its land supply which if utilised to meet accommodation need would result in the following:

Table 8.4: Summary of accommodation needs 2021-40 (pitches) (Hastings)

Period	Ethnic definition	PPTS 2015 definition	Work definition
Total 2021-26	7	0	0
Total 2026-31	1	0	0
Total 2031-36	1	0	0
Total 2036-40	1	0	0
Total 2021-40	10	0	0

Source: GTAA 2022

Table 8.5: Summary of accommodation needs 2021-40 (pitches) (Lewes)

Period	Ethnic definition	PPTS 2015 definition	Work definition
Total 2021-26	3	0	0
Total 2026-31	1	1	1
Total 2031-36	1	1	1
Total 2036-40	1	1	1
Total 2021-40	6	3	3

Source: GTAA 2022

8.7 Lewes has a proposed 5-pitch site in its land supply which if utilised to meet accommodation need would result in the following:

Table 8.6: Summary of accommodation needs 2021-40 (pitches) (Lewes)

Period	Ethnic definition	PPTS 2015 definition	Work definition
Total 2021-26	0	0	0
Total 2026-31	0	0	0
Total 2031-36	0	0	0
Total 2036-40	1	0	0
Total 2021-40	1	0	0

Source: GTAA 2022

Table 8.7: Summary of accommodation needs 2021-40 (pitches) (Rother)

Period	Ethnic definition	PPTS 2015 definition	Work definition
Total 2021-26	12	4	2
Total 2026-31	4	3	3
Total 2031-36	5	5	4
Total 2036-40	5	4	4
Total 2021-40	26	16	13

Source: GTAA 2022

8.8 Rother has a proposed land supply of 4 pitches across two sites which if utilised to meet accommodation need would result in the following:

Table 8.8: Summary of accommodation needs 2021-40 (pitches) (Rother)

Period	Ethnic definition	PPTS 2015 definition	Work definition
Total 2021-26	8	0	0
Total 2026-31	4	3	1
Total 2031-36	5	5	4
Total 2036-40	5	4	4
Total 2021-40	22	12	9

Source: GTAA 2022

Table 8.9: Summary of accommodation needs 2021-40 (pitches) (SDNPA)

Period	Ethnic definition	PPTS 2015 definition	Work definition
Total 2021-26	2	0	0
Total 2026-31	1	1	1
Total 2031-36	1	1	1
Total 2036-40	1	1	1
Total 2021-40	5	3	3

Source: GTAA 2022

8.9 SDNP has no proposed land supply to meet the accommodation needs of Gypsies and Travellers. As such, its identified accommodation need remains the same as above.

Table 8.10: Summary of accommodation needs 2021-40 (pitches) (Wealden)

Period	Ethnic definition	PPTS 2015 definition	Work definition
Total 2021-26	22	6	1
Total 2026-31	9	8	6
Total 2031-36	10	9	8
Total 2036-40	10	9	7
Total 2021-40	51	32	22

Source: GTAA 2022

8.10 Wealden currently has no proposed land supply. The Council will consider new sites and extensions to existing sites as part of its new Local Plan process. As such, its identified accommodation need remains the same as above.

Travelling Showpeople

Table 8.11: Summary of accommodation needs 2021-40 (plots)

Total 2021-26	0
Total 2026-31	1
Total 2031-36	1
Total 2036-40	1
Total 2021-40	3

Source: GTAA 2022

Boat Dwellers

8.11 There is a lack of navigable waterways within the study area and few suitable locations for moorings. Consultation with stakeholders suggests that there is accommodation need for boat dwellers residing in the study area. However, a lack of evidence means that it is difficult to quantify the need. As such, the GTAA recommends that accommodation need for boat dwellers is considered on a case-by-case basis.

The location of new provision

8.12 There is a general consensus that smaller sites are preferred by Gypsy and Traveller communities due to their perceived better management and the maintenance of provision and security. Ongoing monitoring of provision and vacant provisions should be undertaken by the local authorities alongside discussions with different community groups, to ensure that any additional need that may arise is identified.

8.13 Ensuring that new provisions are located in a safe environment is important although the impact of land costs on determining feasibility must also be considered. The settled community, neighbouring sites, or moorings should also be involved in consultations. With regards to boat dwellers, there is potential for increasing the provisions of permanent moorings on existing yards and marinas. It is important for

the study area local authorities to work closely with CRT and NBTA to assist them with the development of new moorings.

8.14 In terms of identifying broad locations for new permanent provisions, there are a number of factors which could be considered including:

Costs

- How do land costs impact on feasibility i.e. is it affordable?
- Implementation of services – is it possible for the new site to connect to nearby mains services (e.g. electricity, gas, water or sewerage)?
- Can good drainage be ensured on the new sites and yards?

Social

- Does the proposed location of the new provision lie within a reasonable distance of school catchment areas?
- Sustainability – is the proposed location close to existing public transport routes?
- Proximity of social and leisure services – is the proposed location close to leisure facilities such as sport centres, cinemas etc. or welfare services such as health and social services etc.?

Availability

- Who owns the land and are they willing to sell / rent?
- Is access easy or will easements across other land be needed both for residents and services/utilities?
- Are utilities close enough to service the provision at realistic prices?

Deliverability

- Does the proposed location meet existing general national planning policy requirements in terms of residential use (for example, impacts on flooding, landscape designations and the historic environment)?
- Can the owner sell the land easily and quickly?
- Can utilities connect to the proposed provision?
- Can highways connect to the proposed provision?

8.15 Considering the evidence gathered throughout the GTAA, it is likely that the key factors determining new provision are:

- The affordability of land suitable for the development of new sites and the cost of development;
- The need to ensure that new provisions are within reasonable travelling distance of social, welfare and cultural services;

- The need to carefully consider the proximity of new provisions to existing provisions (i.e. whether social tensions might arise if new provisions are located too close to existing provisions); and
- The sustainability of new provisions (i.e. ensuring that they do not detrimentally impact on the local environment and do not place undue pressure on the local infrastructure).

8.16 It is important that new provisions are located close to amenities such as shops, schools and healthcare facilities or where there are good transport links to such facilities. The PPTS (2015) states that local planning authorities should strictly limit new Gypsy and Traveller site development in the open countryside that is away from existing settlements or outside areas allocated in the development plan. Local planning authorities should ensure that sites in rural areas do not dominate the nearest settled community and avoid placing an undue pressure on the local infrastructure. As stated in Chapter 2, the study area Local Plan policies contain locational criteria to help determine suitable locations for the development of new sites or yards already.

8.17 The PPTS (2015) also states that when considering applications, local planning authorities should attach weight to the following matters:

a. effective use of previously developed (brownfield), untidy or derelict land;
b. sites being well planned or soft landscaped in such a way as to positively enhance the environment and increase its openness;
c. promoting opportunities for healthy lifestyles, such as ensuring adequate landscaping and play areas for children; and
d. not enclosing a site with so much hard landscaping, high walls or fences, that the impression may be given that the site and its occupants are deliberately isolated from the rest of the community.

The size of new provision

8.18 There are differences between the different communities as to the ideal size of new accommodation provision. The following presents an overview according to community type.

Gypsy and Traveller pitches

8.19 Although withdrawn in 2015, the DCLG (2008) provided useful guidance on the design of Gypsy and Traveller sites. It states that there is no one-size-fits-all measurement of a pitch as, in the case of the settled community, this depends on the size of individual families and their particular needs. However, they do suggest that as a general guide, it is possible to specify that an average family pitch must be

capable of accommodating an amenity building, a large trailer and touring caravan, (or two trailers, drying space for clothes, a lockable shed for bicycles, wheelchair storage etc.), parking space for two vehicles and a small garden area.

8.20 Based on previous and current Government guidance, it can be determined that a pitch of approximately 325 square metres would take into account all minimum separation distance guidance between caravans and pitch boundaries as stipulated in guidance and safety regulations for caravan development. However, a larger pitch size of at least 500 square metres (0.05ha) would comfortably accommodate the following on-pitch facilities:

- Hard standing for a touring caravan (enabling households to travel);
- Hard standing for a static caravan (including double static trailers);
- 2 car parking spaces;
- 1 amenity block;
- Hard standing for storage shed and drying; and
- Garden/amenity area.

8.21 If granting planning permission on an open plan basis, planning permission should be given on a pitch-by-pitch equivalent basis to the above. For example, an existing pitch which has enough space to accommodate a chalet structure, 2 touring caravans and 1 – 2 static caravans along with 4 parking spaces, 2 blocks etc., could be counted as 2 pitches even if based on an open plan basis on one structured pitch. However, this would need to be recorded for future monitoring.

Showpeople plots

8.22 New plots need to provide sufficient space for work equipment as well as space for residential accommodation. This includes space situated away from the living quarters for the storage and maintenance of work equipment and vehicles, as well as space to accommodate domestic vehicles. Due to the need for both accommodation space and space for the storage and maintenance of large equipment, Showpeople plots tend to be much larger than Gypsy and Traveller pitches. It is recommended that the study area local authorities work closely with representative organisations such as the Showmen's Guild to ensure that any provision meets guidance.

Boat Dweller Moorings

8.23 Both permanent and transit moorings require access to relevant provisions and services and should be located in safe locations accessible to emergency services. It is recommended that the study area local authorities work closely with representative organisations such as NBTA and RBOA, and local waterways

authorities to ensure that any new provision meets guidance (e.g. Canal and River Trust (CRT) 2017 and NBTA).

Transit provision

8.24 Similar to the above, there are differences between the different communities as to the ideal size of new transit provision. The following presents an overview according to community type

Gypsies and Travellers

8.25 As discussed in Chapter 5, there is insufficient evidence to determine the number of additional transit pitches required. As such, it is recommended that the local authorities keep more detailed records of unauthorised encampments e.g. the number of vehicles involved and length of stay, to help determine need. Additional transit provision could be met through a windfall or criteria-based policy.

8.26 It is also recommended that the study area local authorities set up a negotiated stopping places policy. The term 'negotiated stopping' is used to describe agreed short-term provision for transient Gypsies and Travellers. It was first developed by Leeds Gypsy and Traveller Exchange (GATE) and involves local authority officers making an agreement with Gypsies and Travellers on unauthorised encampments. The agreement allows Travellers to stay either on the land they are camped on or move to more suitable land (please see Appendix 1 for an example negotiated stopping place protocol).

8.27 Caravans on negotiated stopping places are allowed to stay for an agreed amount of time. This could be on private or public land providing the encampment does not cause any danger, problems or nuisance to its occupants or local community. The arrangement is between the local authority, police, the transient households (and landowner if situated on privately owned land).

8.28 The length of the agreement can also vary from 2 weeks to several months but tend to be around 28 days. The agreement is a local one and will vary but may include Travellers agreeing to leave sites clean and not make too much noise with the local authority providing waste disposal and toilets, sometimes showers and water too. However, as Leeds GATE state, negotiated stopping is a locally agreed solution so may differ in different locations. For Negotiated Stopping to work it has to involve local authorities negotiating with roadside Travellers. It will involve talking to and consulting roadside Travellers and working out solutions[31].

[31] See https://www.negotiatedstopping.co.uk/what-is-negotiated-stopping

8.29 The location of a negotiated stopping place could be where the transient household is located at the time they are identified. If not appropriate, the household could be moved on to an appropriate alternative location. It is important for local authorities to respond to the temporary accommodation needs of transiting households within the local authority area rather than simply directing them to neighbouring authorities. Also, local authorities should consider allowing households visiting family or friends who reside on permanent sites in the local authority area to temporarily reside on the site for an agreed amount of time.

8.30 Agreements could be made with households residing on sites and allowing visiting family and friends to stay for agreed periods of time. This would lead to fewer unauthorised encampments which adversely impact on the local community.

Showpeople

8.31 Whilst there is no evidence of unauthorised encampments being undertaken by Travelling Showpeople, there is still a need to consider their transit needs. This could include allowing households to reside at an agreed location for a specified length of time, prior to, and after, hosting fairs or events.

Boat Dwellers

8.32 There is a need for more short-stay moorings to meet the transit needs of boat dwellers. Greater flexibility in terms of length of time boat dwellers can occupy transit moorings, particularly out of season, may help meet the needs of transiting boat dwellers. There is also the need to consider the locality of the moorings and ensure sufficient spaces are made available for necessary services and provisions. The setting up and management of new moorings should be implemented in conjunction with local waterways' authorities and key agencies such as the NBTA and the RBOA.

Summary

8.33 There is an overall accommodation need in the local authority areas over the period 2021-2040 for 107 additional pitches (ethnic definition), 55 pitches (PPTS 2015 definition), and 43 pitches ('travel to work' definition'). In relation to Showpeople, there is a need for 3 additional plots over the period 2021-2040. There is no additional need for permanent moorings for boat dwellers. There is also a need for (an unknown number) of additional transit moorings for boat dwellers. It is recommended that the councils have a corporate policy in place to address negotiated stopping places for small scale transient Gypsy and Traveller encampments.

8.34 It is also recommended that the local planning authorities incorporate into the local plan a criteria-based policy which considers planning applications that might materialise over the plan period from households whose existence was not known at

the time of the assessment. This could include households residing on unauthorised developments, unauthorised encampments, due to in-migration, and those residing in bricks and mortar accommodation. This accommodation need should be considered separate to the need identified above and could be met through windfall applications.

8.35 Local Plans should be developed with regard to the National Planning Policy Framework (NPPF) (July 2021), PPTS (2015), and the Equalities Act (2010). As such, in relation to Gypsies and Travellers, it is recommended within the study area, Local Plans should seek to meet the PPTS need (as required) with 'ethnic' need (potential need) covered by a criteria-based policy. This will not only demonstrate knowledge of the overall accommodation need of all Gypsies and Travellers but will also demonstrate how the accommodation need for those who do not meet the PPTS definition are being addressed. The local authorities could work with the PPTS definition for Gypsies and Travellers, with the remaining need from the ethnic definition as a potential need. This means that the Local Plans should seek to meet the PPTS need (as required) with the difference between the PPTS and the 'ethnic' need (potential need) covered by a criteria-based policy, such as through a windfall policy, if the respective council is unable to do so through allocation for all need (including those who do and do not meet the PPTS definition). It is important to note that this only refers to Gypsies and Travellers and not Travelling Showpeople.

8.36 As well as quantifying accommodation need, the study also makes recommendations on other key issues including:

Meeting accommodation needs:

- It is recommended that the study area councils consider how the land identified in the Local Authority Allocations Policy can best meet the identified accommodation needs, in relation to Gypsies, Travellers and Travelling Showpeople.
- In relation to Gypsies and Travellers it is also recommended that the study area councils work closely with the families to determine how their accommodation need can best be met.
- Also, for the local authorities to provide pre-planning application advice to households who have identified land to help determine if it is suitable to address accommodation need.
- In order to meet the accommodation needs of Travelling Showpeople it is also recommended that the Council works closely with the owners of the current yard.
- Accommodation need for boat dwellers is met as it arises and considered on a case-by-case basis.

Planning policy:

- To liaise with owners of the sites and yards to determine how they could expand the number of pitches to meet the family's accommodation needs.
- To consider how the accommodation needs can be met by expanding existing provision and/or providing new sites.
- To consider alternative options for developing new sites, yards and moorings, such as sites developed on a cooperative basis, shared ownership, or small sites owned by a local authority, but rented to families for their own use.
- To consider safeguarding Gypsy, Traveller and Travelling Showpeople sites and yards with permanent planning permission for their current use unless it can be demonstrated that they are no longer needed to meet identified need.
- The population size and demographics of the Gypsy, Traveller, Travelling Showpeople and boat dweller communities can change rapidly. As such, their accommodation needs should be reviewed every 5 to 7 years.

Management:

- Local authority housing providers, and where possible registered providers, need to consider the type of housing allocated to Gypsies and Travellers residing in bricks and mortar in order to minimise the psychological aversion and feelings of isolation.
- The local planning authorities develop a holistic vision for their respective authority's work on Gypsies and Travellers and embed it in Community and Homelessness Strategies, Local Plans and planning and reporting obligations under the Equality Act 2010.
- Provide training and workshop sessions with local authority and service provider employees (and elected members) to help them further understand the key issues facing the Gypsy and Traveller, Travelling Showpeople and Boat dweller communities.
- Local housing authorities should ensure that Gypsy and Traveller categories are included on ethnic monitoring forms (if they are not already), to improve data on population numbers, particularly in housing.
- To consider alternative site funding mechanisms such as site acquisition funds; loans for private site provision through Community Development Financial Institutions; and joint ventures with members of the Gypsy and Traveller community.
- Implement corporate policy to provide negotiated stopping arrangements to address unauthorised encampments for set periods of time at agreed locations (either on a county wide basis or across the study area).
- For the local authorities keep more detailed records of unauthorised encampments e.g. the number of vehicles involved and length of stay, to help determine need.

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Glossary

Amenity block
A small permanent building on a pitch with bath/shower, WC, sink and (in some larger ones) space to eat and relax. Also known as an amenity shed or amenity block.

Authorised site
A site with planning permission for use as a Gypsy and Traveller site. It can be privately owned (often by a Gypsy or Traveller), leased or socially rented (owned by a council or registered provider).

Average
The term ‘average’ when used in this report is taken to be a mean value unless otherwise stated.

Bargee Travellers and boat dwellers
As defined by the National Bargee Travellers Association (NBTA):

> “Someone who lives aboard a vessel (which may or may not be capable of navigation), that the vessel is used as the main or only residence and where that vessel is either (i) moored in one location for more than 28 days in a year (but may occasionally or periodically leave its mooring); or (ii) has no permanent mooring and navigates in accordance with the statutes appropriate to the navigation such as inter alia s.17(3)(c)(ii) of the British Waterways Act 1995 or s.79 of the Thames Conservancy Act 1932”.

The NBTA also distinguish between 'Bargee Travellers' and ‘boat dwellers’. ‘Bargee Travellers’ are people whose main or only home is a boat without year-round access to a permanent mooring. 'Boat dwellers' are considered by the NBTA to be people whose main or only home is a boat and who have year-round access to a permanent mooring, whether or not that mooring has planning consent for residential use.

Bedroom standard
The bedroom standard is based on that which was used by the General Household Survey to determine the number of bedrooms required by families. For this study, a modified version of the bedroom standard was applied to Gypsies and Travellers residing on sites to take into account that caravans or mobile homes may contain both bedroom and residing spaces used for sleeping. The number of spaces for each accommodation unit is divided by two to provide an equivalent number of bedrooms. Accommodation needs were then determined by comparing the number (and age) of family members with the number of bedroom spaces available.

Bricks and mortar accommodation
Permanent housing of the settled community, as distinguished from sites.

Caravan
Defined by Section 29 (1) of the Caravan Sites and Control of Development Act 1960:

"... any structure designed or adapted for human habitation which is capable of being moved from one place to another (whether by being towed, or by being transported on a motor vehicle or trailer) and any motor vehicle so designed or adapted."

Concealed household
A household or family unit that currently lives within another household or family unit but has a preference to live independently and is unable to access appropriate accommodation (on sites or in housing).

Doubling up
More than one family unit sharing a single pitch.

Emergency stopping places
Emergency stopping places are pieces of land in temporary use as authorised short-term (less than 28 days) stopping places for all travelling communities. They may not require planning permission if they are in use for fewer than 28 days in a year. The requirements for emergency stopping places reflect the fact that the site will only be used for a proportion of the year and that individual households will normally only stay on the site for a few days.

Family Owner Occupied Gypsy Site
Family sites are seen as the ideal by many Gypsies and Travellers in England. They are also often seen as unattainable. There are two major obstacles, namely money/affordability and getting the necessary planning permission and site licence. While the former is clearly a real barrier to many less well-off Gypsies and Travellers, getting planning permission for use of land as a Gypsy caravan site (and a 'site' in this context could be a single caravan) is currently a major constraint on realising aspirations among those who could afford to buy and develop a family site.

Family unit
The definition of 'family unit' is used flexibly. The survey assumes that a pitch is occupied by a single household or family unit although it acknowledges that this may also include extended family members or hidden households.

Gypsy
Member of one of the main groups of Gypsies and Travellers in Britain. In this report it is used to describe English (Romany) Gypsies, Scottish Travellers and Welsh Travellers. English Gypsies were recognised as an ethnic group in 1988.

Gypsy and Traveller
As defined by the Government's Planning Policy for Traveller Sites (August 2015) document:

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, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

The guidance also states that in determining whether persons are "gypsies and travellers" for the purposes of planning policy, consideration should be given to the following issues amongst other relevant matters:

a) whether they previously led a nomadic habit of life;
b) the reasons for ceasing their nomadic habit of life; and
c) whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.

Hidden Household
A household not officially registered as occupying a site/yard or pitch/plot who may or may not require separate accommodation.

Household
The definition of 'household' is used flexibly. The survey assumes that a pitch is occupied by a single household or family unit although it acknowledges that this may also include extended family members or hidden households.

Irish Traveller
Member of one of the main groups of Gypsies and Travellers in Britain. Distinct from Gypsies but sharing a nomadic tradition, Irish Travellers were recognised as an ethnic group in England in 2000.

Local Authority Sites
The majority of local authority sites are designed for permanent residential use.

Local Development Documents (LDD)
These include Development Plan Documents (which form part of the statutory development plan) and Supplementary Planning Documents (which do not form part of the statutory development plan). LDDs collectively deliver the spatial planning strategy for the local planning authority's area.

Negotiated Stopping
The term 'negotiated stopping' is used to describe agreed short-term provision for Gypsy and Traveller caravans. It does not describe permanent 'built' transit sites but negotiated

arrangements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets. The arrangement is between the local authority and the (temporary) residents.

Net need
The difference between need and the expected supply of available pitches (e.g. from the re-letting of existing socially rented pitches or from new sites being built).

New Traveller (formerly 'New Age Traveller')
Member of the settled community who has chosen a nomadic or semi-nomadic lifestyle. The first wave of New Travellers began in the 1970s and were associated with youth culture and 'new age' ideals. They now comprise a diverse range of people who seek an alternative lifestyle for differing reasons including personal or political convictions. Economic activities include making hand-made goods that are sold at fairs.

Newly forming families
Families residing as part of another family unit of which they are neither the head nor the partner of the head and who need to live in their own separate accommodation, and/or are intending to move to separate accommodation, rather than continuing to live with their 'host' family unit.

Overcrowding
An overcrowded dwelling is one which is below the bedroom standard. (See 'Bedroom Standard' above).

Permanent residential site
A site intended for long-stay use by residents. It has no maximum length of stay but often constraints on travelling away from the site.

Pitch
Area on a site developed for a family unit to live. On socially rented sites, the area let to a tenant for stationing caravans and other vehicles.

Plot
Area on a yard for Travelling Showpeople to live. As well as dwelling units, Travelling Showpeople often keep their commercial equipment on a plot.

Primary data
Information that is collected from a bespoke data collection exercise (e.g., surveys, focus groups or interviews) and analysed to produce a new set of findings.

Private rented pitches
Pitches on sites which are rented on a commercial basis to other Gypsies and Travellers. The actual pitches tend to be less clearly defined than on socially rented sites.

Psychological aversion
Whilst not a medical condition this is a term that is accepted as part of accommodation assessments in encapsulating a range of factors that demonstrate an aversion to residing in bricks and mortar accommodation (see DCLG October 2007). The factors concerned can include feelings of depression, stress, sensory deprivation, feeling trapped, feeling cut off from social contact, a sense of dislocation with the past, feelings of claustrophobia. Proven psychological aversion to residing in bricks and mortar accommodation is one factor used to determine accommodation need.

Secondary data
Existing information that someone else has collected. Data from administrative systems and some research projects are made available for others to summarise and analyse for their own purposes (e.g. Traveller Caravan Count).

Settled community
Used to refer to non-Gypsies and Travellers who live in housing.

Site
An area of land laid out and/or used for Gypsy and Traveller caravans for residential occupation, which can be authorised (have planning permission) or unauthorised. Sites can be self-owned by a Gypsy and Traveller resident or rented from a private or social landlord. Sites vary in type and size and can range from one-caravan private family sites on Gypsies' and Travellers' own land, through to large local authority sites. Authorised private sites (those with planning permission) can be small, family-run, or larger, privately-owned rented sites.

Socially rented site
A Gypsy and Traveller site owned by a council or private Registered Provider. Similar to social rented houses, rents are subsidised and offered at below private market levels.

Tolerated and Untolerated sites
According to the DLUHC July 2021 Traveller Count Technical Notes, a 'tolerated' site is one where the local authority has decided not to seek the removal of the encampment, and where the encampment has been, or is likely to be, allowed to remain for an indefinite period of time.

Examples of a site which would be classified as 'not tolerated' are:

- A planning enforcement notice has been served (including Temporary Stop Notices)
- The results of a planning enquiry are pending
- An injunction has been sought

- The compliance period has been extended.

Transit site/pitch

This is the authorised encampment option for Gypsies and Travellers travelling in their caravans and in need of temporary accommodation while away from 'home'. Transit sites are sometimes used on a more long-term basis by families unable to find suitable permanent accommodation

Travelling Showpeople

People who organise circuses and fairgrounds and who live on yards when not travelling between locations. Most Travelling Showpeople are members of the Showmen's Guild of Great Britain.

Unauthorised development

Unauthorised developments include situations where the land is owned by the occupier, or the occupier has the consent of the owner (e.g. is tolerated /no trespass has occurred), but where relevant planning permission has not been granted.

Unauthorised encampment

Unauthorised encampments include situations where the land is not owned by the occupier, the land is being occupied without the owner's consent, and as such a trespass has occurred. An encampment can include one or more vehicles, caravans or trailers.

Unauthorised site

Land occupied by Gypsies and Travellers without the appropriate planning or other permissions. The term includes both unauthorised development and unauthorised encampment.

Yard

An area of land laid out and/or used for Travelling Showpeople caravans for residential occupation, which can be authorised (have planning permission) or unauthorised. Yards can be self-owned by Showpeople residents or rented from a private or social landlord. For clarity, we refer to Showpeople 'plots' rather than 'pitches', and 'yards' rather than 'sites' to recognise the differences in design. It should be borne in mind that the amount of land needed for a Showpeople plot is greater than that for Gypsy and Traveller pitches because of the mixed use of the plots i.e. they may need to accommodate equipment as well as space for residential use.

Appendix 1: Negotiated stopping place protocol example

This agreement is between [Local Authority] and [named head of family]

This agreement relates to the time limited toleration of your encampment on [Local Authority] owned land adjacent to xxxx. The land is shown on the appending map.

The Council is currently willing to tolerate your encampment on the site for a short period of time until xxxx. The Council recognises its legal obligations to carry out needs assessment prior to initiating legal action to recover possession of land.

[Local Authority] reserves the right to terminate this agreement, and to seek to recover possession of the land through court proceedings, at an earlier date if the terms set out below in this agreement are breached.
I …….., and my family agree to adhere to the following terms:

1. You will be asked to park your caravan and vehicles in a designated place on the site. This is to prevent further caravans joining the encampment. Your family must stay within the boundaries of the site.

2. You will be issued with a toilet. This is for the sole use of your family, you will have to ensure this is kept in a reasonable condition. This will be emptied weekly.

3. You will be issued with a bin for all your domestic waste. You are responsible for keeping the area around your caravan clean and tidy. The bin is for the sole use of your family, you will have to ensure this is kept in a reasonable condition. This will be emptied weekly.

4. All dogs must be kept under control and tied up. Dogs must be tied up on a lead or in a kennel during the night or when you leave the site for any period of time. The dog wardens will visit this site if loose dogs are reported.

5. No fires larger than a small cooking fire are to be lit, absolutely no burning of commercial or domestic waste is allowed.

6. The nearest Household Waste for larger items is at …….. Trade waste can be disposed at …….

7. Environmental enforcement officers will monitor the site and take action against any activity likely to cause environmental harm, inconvenience or distress to surrounding occupants such as fly-tipping, excessive noise or use of quad bikes.

8. Give consideration to other people within the local vicinity in terms of noise nuisance and the parking of vehicles.

9. Not to engage in any anti-social behaviour, disorder or fly tipping on or near this site. Horses will not be tolerated on the site and the presence of horses may be regarded as

‘anti social behaviour’ for the purposes of this agreement. Any traps owned by families are not to be used in or around the immediate area.

10. This agreement has been negotiated between [Local Authority] and Gypsy/Traveller people in the [local] area. You are encouraged to cooperate with the Local Authority to make the agreement work by discussing any incidents, concerns or suggestions that may affect the agreement with local authority officers when they visit weekly. You can also telephone the council [phone number], [police liaison officer] or speak to staff at [Third party advocacy where available] if you want them to raise issues on your behalf.

I understand the above points which have been explained to me, and I agree.

Signed……date……

Signed……..date…….....(local authority)

Dependant Children