

JOINT EVIDENCE PAPER

PROVISION FOR GYPSIES AND TRAVELLERS IN EAST SUSSEX

INTRODUCTION

1 This paper summarises the evidence surrounding the issue of the provision of additional pitches for the Gypsy and Traveller community in East Sussex and Brighton & Hove. It has been prepared by East Sussex County Council officers on behalf of the joint Local Authorities¹ and is intended for use as background evidence in the preparation of Local Development Frameworks (LDFs). It provides a chronological summary of the work undertaken by the joint Local Authorities for the Partial Review of the South East Plan and incorporates the outcome of subsequent officer discussions following the Examination in Public (EiP). Although that Partial Review of the Regional Strategy has been abandoned and the formal process remains incomplete, this paper considers and responds to issues raised during the Examination in Public and set out in the (unfinished) Panel's Report that are applicable to the East Sussex and Brighton & Hove GTAA area. Thus, it provides as complete and up to date a view as possible of the available evidence and its interpretation as a basis for planning.

Evidence Trail

2 The main sources of evidence are set out below together with the relevant EiP document reference where applicable. The entire Examination in Public document archive can be accessed at:

http://webarchive.nationalarchives.gov.uk/20100505161131/http://www.planning-inspectorate.gov.uk/pins/rss/south_east_g&t/CoreDocuments.htm

- The Gypsy and Traveller Accommodation Needs Assessment (GTAA) for East Sussex and Brighton & Hove, 2006 (CD2.1)
- The joint Local Authorities' advice paper to the South East Regional Assembly, *Towards a Baseline Distribution of Future Pitch Provision*, which examined the GTAA and came to a conclusion about the need for additional residential pitch provision between 2006 and 2016, October 2007 (CD7.4a)
- Pat Niner's GTAA Benchmarking and Audit of Advice Final Summary Report and Appendices prepared for SEERA, January 2008 (CD2.19 and 2.20)
- The submitted South East Plan Partial Review on the Provision for Gypsies and Travellers, June 2009.
- South East England Regional Gypsy and Traveller Transit Study - Final Report, Pat Niner CURS University of Birmingham, October 2009.
- The Examination in Public Panel's (unfinished) Draft Report and the joint Local Authorities' view of its conclusions, released Summer 2010.

PERMANENT RESIDENTIAL PITCHES

The GTAA

3 The East Sussex and Brighton & Hove GTAA was commissioned by the 6 constituent Housing Authorities and undertaken by David Couttie Associates (DCA). The survey pre-dated the February 2006 CLG Draft Practice Guidance on Accommodation Assessments (CD1.16). However, the DCA report was finalised in October 2006 and presents an estimate

¹ Eastbourne and Hastings Borough Councils, Lewes, Rother and Wealden District Councils, Brighton & Hove City Council and East Sussex County Council

of additional pitch requirements for 2006-11, broadly in line with the model in the Draft Practice Guidance. However as one of the first GTAA's, it was not without shortcomings.

4 The summary of the model DCA used to calculate pitch requirements is at chapter 5 (page 77) of the GTAA.

5 The Local Authorities were required by the Regional Assembly to undertake a self assessment benchmarking exercise of their respective GTAA's. This was followed by a separate independent assessment by Pat Niner, a leading expert in the field, for the Regional Assembly².

Shortcomings of the GTAA

6 The conclusions of the Local Authorities' collective benchmarking of the GTAA were confirmed by Pat Niner's independent benchmarking assessment of May 2007. She concluded that overall the GTAA "probably over-states requirements [for permanent pitches] to a significant extent" (Question 12). In summary, her key conclusions are:

- a reasonable survey method and sample achieved (Question 2);
- travelling show-people were not covered (Question 1);
- some double counting exists, notably between concealed households and new family formation (Question 6);
- some undercounting exists, notably there is no evident count of movement from houses to sites, but she acknowledged some may be included among households on site waiting lists (Question 7)
- some overestimation exists, notably:
 - that all households on unauthorised encampments (UEs) are assumed to need residential pitches (Question 5); and
 - very high household formation rates, derived from survey but impossible to check, compared to average household size (Question 6).³

The Local Authorities' Joint Advice

7 In the light of the benchmarking outcome the local authorities re-examined, and made adjustments to, the DCA accommodation needs model to provide the best estimate of permanent pitch requirements in the area to meet the Regional Assembly's brief.

8 The adjustments to the GTAA made by the joint Local Authorities are explained in detail in the advice paper *Towards a Baseline Distribution of Future Pitch Provision* (CD7.4a). The table on page 2 sets out our reworking of the DCA needs assessment line by line. We concluded an additional 47 permanent pitches were needed for the 2006-11 period, rather than the DCA assessment of 80 additional (unspecified) pitches.

9 This reflects the overestimation conclusion reached by Pat Niner's benchmarking of the GTAA and meets her comments on:

- double counting between overcrowding/concealed households and new household formation (Question 3);
- unauthorised developments, where we accepted all needed permanent provision, but excluded any assumptions regarding future planning permissions (Question 4);

² Reproduced respectively at Annexes A and B in our advice paper *Towards a Baseline Distribution of Future Pitch Provision* (CD7.4a).

³ Here there is clearly an error in Pat Niner's assessment at Question 6 where she states that household sizes are "unusually large at only 3.2 persons". From the context, the "large" clearly should read "small".

- unauthorised encampments, where we used local knowledge to estimate how many needed permanent rather than transit pitches (Question 5);
- future household formation, where we used 3% pa growth rather than the high, un-checkable DCA figure; (Question 6);
- movement from sites to houses, where recent experience suggested our assumptions are reasonable (Question 7);
- movement from houses to sites where we included those registered on site waiting lists (Question 7); and
- the supply of pitches 2006-11, where we excluded future planning permissions and movements to unauthorised sites (Question 11).

10 The joint LA advice for 2011-2016 used the same rates for household formation and transfer between sites and housing as in the preceding period. We concluded that post 2011 future site requirements from new households (13 pitches) and transfers from houses to sites (5 pitches) would be more than offset by vacancies arising from future transfers from sites to housing (23 pitches⁴). Therefore, we concluded no further additional pitches would be required up to 2016 (CD7.4a pages 7-8). In reaching our conclusion we used the same vacancy rate of 5.7% pa post 2011 that was accepted in the audit of our advice for 2006-11.

11 Having established the overall scale of additional pitch provision through reworking the GTAA, the joint LA Advice paper *Towards a Baseline Distribution of Future Pitch Provision* (CD7.4a) also provided a distribution of additional pitch requirements per authority area based on meeting needs where they arise. This distribution was known as Option A in the Partial Review context.

12 In addition to that Option A distribution, the Regional Assembly also required us to provide an Option B distribution of the same figure, on a more sustainable basis. The method and results of this are set out in the joint Local Authority paper: *Developing a More Sustainable Distribution of Future Pitch Provision* (CD4.4e). There is very little difference between the two distributions, so the principle of meeting needs in the authority area where they arise is reasonably sustainable.

Pat Niner's Audit of the Local Authorities' Joint Advice

13 Pat Niner undertook an independent audit of our joint LA advice to SEERA and full details of her report are contained in CD2.19 from page 139 onwards.

Overall permanent pitch requirements for 2006-11

14 On residential pitch requirements for 2006-11 she concluded that the reduction from 80 in the GTAA to our estimate of 47 is "logical and valid". She acknowledged the largest influence on this was the lack of distinction in the GTAA between transit and residential pitch needs and concluded that our split based on local experience was reasonable. Our other adjustments she regarded as sensible and made good use of available evidence.

15 However, her Audit also raised "a slight question mark" over the way we had treated the movement of Gypsies from housing to sites. Our estimate here was based on the number of interviewees in the GTAA who had actually registered for a place on a site. Pat Niner accepted this was "reasonable as a measure of need but, lower than a measure of demand or aspiration would be". She suggested that demand might become more real as sites are provided and considered that the figure should be kept under review.

Distributions

16 The audit acknowledged we had to estimate the Option A distribution - meeting needs where they arise - from available evidence as the GTAA did not explicitly distribute pitch

⁴ not 35 as Pat Niner's audit claims on page 142 of CD2.19.

requirements between local authority areas. She concluded the distribution was “well reasoned, logical and apparently robust”.

17 She also concludes the joint Authorities Option B distribution - explained in *Developing a More Sustainable Distribution of Future Pitch Provision* (CD7.4f) - is robust overall. She describes our method as “a logical and quite ingenious approach which is well explained and substantiated”. That said, she acknowledged that the differences between the two distributions were actually quite small but had the effect of a slight redistribution of pitches from urban to more rural authority areas.

Permanent pitch requirements for 2011-16

18 Overall Pat Niner did not regard it as reasonable that there would be no additional pitch requirements for this period for a growing population as our joint advice had argued. She considered the way we used our estimate of 35 vacancies arising over the period to offset needs from an assumed 3% pa household growth was unreasonable.

19 She thought this vacancy estimate - which she ascribed as arising largely from the movement off sites into housing - was too high, contrasting it with our advice on the movement from houses to pitches of only 5 for the 2006-11 period. She argued that many of the households on sites in 2011 would have moved there by choice as the backlog was met between 2006 and 2011 and would presumably have lower vacancy rates.

20 Consequently she recommended providing for an additional 13 pitches for 2011-16 based solely on a 3% pa household growth rate, discounting any allowance for future vacancies, arguing our estimate was:

- an implicitly assumed, unrealistic net movement from sites to houses; and
- inconsistent, as other advice uses only 3% household growth.

21 The Joint LA responses to these two main strands of criticism are explained below.

Vacancies and post 2011 pitch provision

22 In April 2008 on behalf of the joint authorities East Sussex officers wrote to SEERA questioning the audit conclusion on vacancies post 2011. Nevertheless, for regional consistency we made it clear we were prepared to accept the (higher) audit figure of additional pitches as a basis for consultation, recognising that the local authorities would be consultees too. SEERA subsequently reinstated our advice figure of zero pitches for the 2011-16 period and reflected this in the submitted Partial Review on the Provision for Gypsies and Travellers in June 2009. This issue is revisited in the LA consideration of the EiP Panel's Report.

The needs of Gypsies and Travellers living in housing

23 The DCA survey for the GTAA interviewed 63 of 142 households that were identified from local records as living in housing. However, the GTAA model includes no explicit count of those needing sites, just a single aggregate figure of all households seeking permanent site accommodation (Row 7) with no indication of their circumstances or where they live. It is likely that some in that category are also counted as concealed households (Row 11) or on unauthorised encampments (Row 8). Our assessment therefore relied on those Gypsies and Travellers living in housing who had actually registered on site waiting lists from Table 4-45 of the GTAA report. This seemed to us to be the most robust and discrete evidence available. We made no further adjustment to our advice nor did the Regional Assembly make any adjustment in the Partial Review on this account.

Policy H7 in the Partial Review

24 The submitted version of the Partial Review of the SE Plan contained specific proposals for pitch provision by local authority area amounting to 55 pitches for East Sussex and Brighton & Hove authorities rather than the 47 we had advised. The additional allocation of 8 pitches arises through a mechanism of regional redistribution undertaken by the Regional Assembly designed to “spread the load” a little more evenly across the South East. It was not based on any fundamental disagreement with our assessment of local needs, even though the Assembly shared Pat Niner’s reservations about our prediction of future vacancies offsetting additional need arising through household growth in the 2011-16 period.

25 The following table sets out the LA advice distributions of our assessed requirement for 47 residential pitches and the submitted Partial Review’s proposed policy H7 distribution of 55 which is derived from Option B distribution but also includes additional pitches from the regional redistribution formula used by the Regional Assembly.

Area	Original joint LA advice. Option A meeting needs where they arise	Original joint LA advice. Option B sustainable distribution	Policy H7 Submitted Partial Review
Eastbourne	1	1	3
Hastings	3	1	2
Lewes	10	9	10
Rother	3	7	7
Wealden	16	18	20
Brighton & Hove	14	11	13
East Sussex	33	36	42
GTAA area	47	47	55

26 For authorities in our GTAA area the total requirements are modest in scale with little variation between options.

Travelling Showpeople

27 The GTAA did not cover Travelling Showpeople. Consequently the joint Local Authorities had to assess requirements locally. We met the local representative of the Showmen’s Guild of Great Britain who indicated that there were four family groups in East Sussex and that they were adequately accommodated and not looking for more space.

28 In confirming⁵ that there was no demand for further yards in our area, the Showmen’s Guild considered that appropriate criteria based policies in LDFs would be sufficient. Despite this the Regional Assembly did make an allocation for a total of 9 plots for Travelling Showpeople in Policy H7a. This allocation was wholly the result of the process of regional redistribution undertaken by the Regional Assembly.

POST EXAMINATION IN PUBLIC APPROACH

New Government Policy

29 The Examination in Public (EiP) into the Partial Review took place in February 2010 and in May that year the Coalition Government was formed.

30 On 6 July 2010 the Chief Planner at Communities and Local Government (CLG) wrote to Chief Planning Officers in England informing them of the Secretary of State’s

⁵ See Appendix B to CD7.4c - Report to Members’ Steering Group of Consultation Responses

announcement of the revocation of Regional Strategies with immediate effect the first step towards abolishing the entire regional planning system in the then forthcoming Localism Bill. One of the immediate consequences was that work on completing the Partial Review process ceased.

31 With the abolition of regional strategies the Government clearly intends that “local authorities will be responsible for determining the right level of site provision, reflecting local need and historic demand, and for bringing forward land in DPDs”⁶.

32 The 6 July 2010 letter also indicated the Government was intent on reviewing national policy for Gypsy and Traveller sites.

[At the time of writing (April 2011) the Localism Bill is progressing through Parliament and the Secretary of State has issued a consultation draft of a new Planning Policy Statement to replace Circulars 01/2006 and 04/2007.]

Examination in Public Panel’s Report

33 At that time of the announcement in July 2010 the EiP Panel’s Report was under preparation, but not finally completed. However, in response to a Freedom of Information request, the unfinished Panel’s Report was released with the following disclaimer.

The document is provided for information only and is being made available to comply with a Freedom of Information/Environmental Information Regulations request. It is an incomplete price of work which has not been subject to any form of quality assurance. The content does not represent the views of the Government and does not form any formal part of the planning system.”

34 Despite its clearly incomplete nature (including, for example, notes of outstanding work and drafting to be completed) and lack of status other than “information”, the Report was evidently a well advanced draft. As it is the numerical work is most obviously incomplete and in part inconsistent, no firm conclusions can be drawn as to the Panel’s recommendations on the precise scale or distribution of pitch provision. However, there are strong indications of their thinking on key issues that were in dispute at the EiP. To that extent it can be regarded as an independent view of the quality and robustness of evidence presented at the EiP which can be used as a basis for policy at the local level.

The East Sussex Authorities’ Approach

35 In East Sussex the joint local authorities wish to conclude the work, started in the Partial Review, on making appropriate provision for Gypsy and Traveller sites, but conclude it in a way that helps inform the LDFs in line with the Coalition Government’s localism agenda.

36 Much good work and evidence was developed during the Partial Review process and we wish to build on and refine that work in the context of the current Government’s policy approach.

37 The joint local authority officers in East Sussex have developed a localist approach to reassessing local needs that is both consistent across the GTAA area and transparent. In this way there is a logical trail of evidence that forms the basis of local policy.

38 As part of our approach we have examined and discussed the unfinished Panel’s Report and made use of the information it contains as part of a collective assessment of needs locally to inform Development Plan policy.

⁶ Letter from Chief Planner CLG to Chief Planning Officers in England, 6 July 2010 - guidance note paragraph 14

39 In the spirit of localism we have agreed a number of principles that depart from the policy direction that was contained in the Partial Review, as follows.

- We do not agree, nor in a localist approach can there be, any top down regional redistribution of pitch requirements from one authority area to another. Consequently, as a GTAA group of authorities we should focus on meeting needs for pitches that arise in our GTAA area.
- The assessment of needs in East Sussex and Brighton & Hove should be based on the “Option A” (meeting needs where they arise) contained in our joint advice to SEERA, rather than “Option B” (a more sustainable distribution) as in the submitted Partial Review. Thus the principle of meeting needs locally applies at local authority level, rather than retaining any redistribution within the GTAA area.
- In line with the view from the Guild of Travelling Showpeople that there is no local need, we will make no explicit provision for further residential plots. However, any proposals that do emerge would be judged against appropriate criteria based policies.

40 At the same time we recognise that there were legitimate questions, either via the audit of our advice or at the EiP itself, concerning some evidence and/or the way in which it had been used that require addressing. In this regard where there are clear generic conclusions on issues by the EiP Panel we have examined them and come to a collective view. However, because of the obviously unfinished nature of the Panel’s Report, we cannot and do not make use of any specific recommendations for pitch numbers.

41 The areas of concern we address are:

- the use of vacancies arising in the stock of pitches;
- the potential demand for pitches from Gypsies and Travellers currently living in houses; and
- the unfinished business of transit site provision.

The Use of Vacancies and its Impact on Future Pitch Provision

42 The Unfinished Panel’s Report (UPR) discusses the use of vacancies that comprise continuing turnover of pitches as a source of supply in paragraphs 2.41 - 2.50. The Panel concludes at paragraph 2.50 that there was no justification for assuming any source of pitch supply from the turnover of pitches, net vacancies or expressed intentions from Travellers to move into houses or elsewhere. The Panel reached this conclusion as there was no hard evidence that stated intentions would materialise or endure as a trend over time. This echoes the views expressed by Pat Niner in the Audit of LA Advice.

43 The joint LA officers accept the conclusion that no account should be taken of vacancies in this way as a source of supply. This has the effect of increasing the 2006 - 11 provision by 10 pitches and requires an additional 14 pitches (rather than zero) for the 2011-16 period.

44 Our paper *Towards a Baseline Distribution of Future Pitch Provision* (CD7.4a) in calculating the requirement for residential pitches from the GTAA discounted 10 vacancies that were predicted to arise over the 2006-11 period from the estimate of requirements. This was based wholly on Travellers who in the GTAA indicated they were planning to move to housing from authorised pitches in the next 12 months. Applying this vacancy rate to the stock of pitches at 2011, assuming the provision was fully implemented, more than offset the gross need for pitches we had calculated for the 2011-16 period. Therefore, by ignoring vacancies we accept that pitch provision for 2011-16 is required and should be based solely on the estimated growth in traveller households.

The Accommodation Needs of Gypsies and Travellers Living in Houses

45 The Panel's Unfinished Report discusses this issue at paragraphs 2.30 - 40. It records that GTAAs included relatively modest scales of need for pitched from housed Travellers compared to some detailed bespoke surveys elsewhere which appeared to reveal considerable hidden demand. Faced with such wide ranging views the Panel concludes that a lack of evidence or information on the issue should be no reason to avoid making provision for this strand of need. Therefore, although it admits it is not evidence based, the Panel recommends using an assumed 10% increase to the planned stock of pitches at 2011 (2006 baseline stock plus provision to 2011) as an allowance for this demand paragraph 2.40). It makes a plea for subsequent rounds of GTAAs to make more explicit attempts to improve coverage of this element of requirement.

46 In the East Sussex and Brighton & Hove GTAA area we had taken account of this aspect of need in our joint LA Advice to SEERA, contrary to the impression given in paragraph 2.35 of the Panel's Unfinished Report. The allowance we made was based on those picked up in the GTAA survey who had registered on site waiting lists as the firmest measure of need we could find. Although Pat Niner's Advice Audit recognised it as a reasonable measure of need, she felt demand may be higher, particularly if stimulated by the availability of pitches as they became provided. She concludes by stating that the figure we used should be kept under review (page 141 CD2.19).

47 Considering all these points of view, the choice lies between whether to:

- ignore the issue altogether as it is too complicated to resolve;
- accept the Pat Niner view that we have a reasonable provision for needs from this source and latent demand should be kept under review; or
- take the Panel view of making an arbitrary allowance of an assumed percentage increase in pitches for demand from housed gypsies for sites.

48 We decided to take the second course. Ignoring the issue altogether is not a realistic option. Making an arbitrary assumption of presumed demand is unreasonable and it merely raises unanswerable questions of scale. However basing such an assumption of "demand" as a function of supply is illogical.

49 Although we intend making no further explicit provision for potential demand from housed gypsies, any proposals would be judged against criteria based policy.

The Scale and Distribution of Residential Pitch Provision

50 The combined effect of this local assessment of the need for Gypsy and Traveller pitches is a consistent and coherent position that can be used to inform the LDFs in the GTAA area.

51 The resulting figures and their derivation are set out in the following table and accompanying notes.

Residential Pitch Provision 2006 - 2016

Column No	2	3	4	5	6	7
Area	Baseline provision of existing authorised pitches in 2006	Proposed additional pitch provision 2006-11	Planned stock of pitches at 2011	Planned stock of pitches at 2016 (calculated)	Planned stock of pitches at 2016 (rounded)	Proposed additional pitch provision 2006-16
Eastbourne	1	1	2	2.30	2	1
Hastings	0	3	3	3.47	3	3
Lewes	11	10	21	24.30	24	13
Rother	7	5	12	13.90	14	7
Wealden	29	24	53	61.40	61	32
Brighton & Hove	0	14	14	16.20	16	16
East Sussex	48	43	91	105.37	105	57
GTAA Area	48	57	105	121.57	122	74

Notes to table

Col.

- 2 Baseline provision of authorised residential pitches at 2006. This is the baseline shown in the submitted Review as amended at the EiP by the authorities and recorded in the Panel's Unfinished Report at paragraph 7.2.
- 3 The proposed additional pitch provision for 2006 - 2011. This is the requirement for additional pitches 2006 - 2011 derived from Joint LA Advice submitted Oct 2007 based on the Option A distribution of meeting needs where they arise. This is the gross requirement shown in the paper *Towards a Baseline Distribution of Future Pitch Provision* (CD7.4a), as we have now agreed to exclude vacancies as contributing towards supply. This would meet both the assessed backlog of need at 2006 by 2011 and the calculated growth in Traveller households over the 5 year period 2006 - 2011.
- 4 The planned stock of pitches at 2011, assuming all provision for the period 2006 - 2011 is completed by 2011. It is column 2 plus column 3.
- 5 The planned stock of pitches at 2016, calculated by applying the 3% per annum compound growth rate used in our Advice Paper *Towards a Baseline Distribution of Future Pitch Provision* (CD7.4a), to the stock of planned pitches at 2011 at local authority level (column 4) to reflect growth in the Traveller population on authorised sites. It is the raw figure from the calculation.
- 6 This is the same as column 5 but simply rounded to whole pitches.
- 7 The proposed additional pitch provision for the ten year period is the planned 2016 stock less the actual 2006 stock and is calculated by subtracting column 2 from column 6.

Provision Beyond 2016

52 It is a matter for individual authorities to consider what specific provision to make for the period beyond 2016. The choice would appear to be between further identification of numbers of pitches to be provided and relying on a criteria-based policy. A numerical based policy could derive from simply extending the 3% per annum compound growth assumption of the stock of pitches. Ultimately, though, the update of evidence through new surveys may be required to underpin longer term provision. This could deal with outstanding issues such

as the potential demand for pitches from Gypsies currently in housing. In the meantime, criteria-based policy may suffice.

TRANSIT SITE PROVISION

The Local Authorities' Joint Advice

53 The original Joint Advice submitted to the Regional Assembly in October 2007⁷ had looked at a number of approaches to the qualitative assessment of demand required. For East Sussex the broad conclusion was:

It would seem that these requirements might best be met by making some form of additional transit provision on one or two small sites further along the coast to meet the needs of Travellers moving through the rest of East Sussex (Eastbourne, Hastings, Rother and Wealden).

54 For Brighton & Hove the conclusion was that their existing City Council run transit site (23 pitches) had not been operating as a true transit site and when its refurbishment was completed and their new approach in operation, it would obviate the need for any further transit provision in the city.

The Partial Review Approach - Local Determination

55 Because of a lack of robust evidence across the region the Partial Review's policy approach was for local authorities to make appropriate provision in Local Development Documents for transit and temporary stopping purposes. The expectation (paragraph 5.16) in the Partial Review was for GTAA or county groupings of authorities to work together to assess needs locally and provide for them accordingly.

56 By coincidence this approach is localist in nature, but to help close the evidence gap on this issue the Regional Assembly indicated it would undertake a regional study.

The Regional Transit Study

57 In the period between submitting the Partial Review and the EiP the Partnership Board (PB) commissioned and completed a Regional Study of Transit Requirements. The PB accepted the study findings and proposals and proposed changes to the submitted Review to take account of it. This did not seek to change the mechanism of the "delegated approach" but does seek to change the indicative starting point.

58 The Transit Study:

- confirmed the paucity of rational, consistent and robust evidence on which to base a quantified assessment of transit need;
- instead used what evidence there was available (CLG caravan counts and local authority/police records) to gauge the regional scale of need; and
- proposed a policy based (rather than needs based) approach to develop a network of sites across the region aimed at facilitating travelling.

The Panel's Unfinished Report

59 The Panel acknowledged that East Sussex and Brighton & Hove provided one third of the region's stock of transit pitches at 2006.

⁷ Transit Needs in East Sussex and Brighton & Hove, October 2007 (CD7.4f)

60 In recognition of the general lack of robust evidence across the region the Panel decided to accept the recommendations for a policy driven provision and the figures in the Regional Transit Study prepared by Pat Niner. For our GTAA area and in recognition of the transit pitches that we already provide, the Panel proposed a further two sites of 4 pitches each to meet pattern of planned provision across region. They retained the proposal that this should be determined in detail locally through continued joint work on local distribution.

The East Sussex Authorities Approach to Transit Provision

61 Officers of the joint authorities agreed to accept the findings of the Regional Transit Study carried out by Pat Niner as they broadly confirmed our original Joint Advice that we should provide an additional 2 sites of 4 pitches each, or equivalent, further east in the county related to the evident historic travelling route along the A27/259 and that this additional provision could be in the form of Temporary Stopping Places.

62 There remains an outstanding issue of how the provision for transit use is to be provided. It was always intended in the Partial Review regime that groups of local authorities would assess need locally and agree how it would be provided for - how much and where. That remains the position but with the benefit of the information and evidence in the Regional Transit Study.

CONCLUSION

63 This evidence paper has been prepared to “complete” the process started by the now abandoned Regional Strategy Review of provision for Gypsies and Travellers.

64 This work has resulted in the “completion” of the planning process at a local level. The Joint East Sussex Authorities have reviewed and interpreted the available evidence in the context of localism and in doing so responded to independent criticisms of the evidence both by Pat Niner and the Examination in Public Panel where their intention is clear and their criticisms coincide.

65 It provides as coherent and consistent strategic framework as possible with the available evidence for making provision in Local Development Documents for this section of the community.

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