Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment

Brighton & Hove City Council and the South Downs National Park Authority

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About the Authors

The Sustainable Housing & Urban Studies Unit (SHUSU) is a dedicated multi-disciplinary research and consultancy unit based at the University of Salford providing a range of services relating to housing and urban management to public and private sector clients. The Unit brings together researchers drawn from a range of disciplines including: social policy, housing management, urban geography, environmental management, psychology, social care and social work.

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Particular thanks must, of course, go to the people who found the time to talk to us and answer our questions in a full, honest and patient manner. It is hoped that this report is able to accurately reflect their experiences and needs.

This report is based on research undertaken by the study team and the analysis and comment thereafter do not necessarily reflect the views and opinions of the research commissioners, or any participating stakeholders and agencies. The authors take responsibility for any inaccuracies or omissions in the report.

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Glossary

The following terms are used in this report and/or are used in conjunction with government planning policy guidance for Gypsy, Traveller and Showpeople accommodation. As such these terms may need some clarification. In the case of those terms which are related to Gypsy and Traveller accommodation and culture, it is noted that a number of these terms are often contested and debated. It is not the intention of the authors to present these terms as absolute definitions: rather, the explanations provided are those the authors used in this assessment as their frames of reference.

Term	Explanation
Amenity block/shed	On most residential Gypsy/Travellers sites these are
	buildings where basic plumbing amenities (bath/shower, WC
	and sink) are provided at the rate of one building per pitch.
Authorised social site	An authorised site owned by either the local authority or a
	Registered Housing Provider.
Authorised private site	An authorised site owned by a private individual (who may or
	may not be a Gypsy or a Traveller). These sites can be owner-
	occupied, rented or a mixture of owner-occupied and rented
	pitches. They may also have either permanent or temporary
	planning permission.
Bricks and mortar	Permanent housing.
Caravan	Mobile living vehicle used by Gypsies and Travellers. Also
	referred to as trailers.
Caravan Count	Bi-annual count of Gypsy and Traveller caravans conducted
	every January and July by local authorities published by the
	DCLG.
Chalet	In the absence of a specific definition the term 'chalet' is
	used here to refer to single storey residential units which
	resemble mobile homes but can be dismantled.
Department for Communities	The main government department responsible for Gypsy and
and Local Government (DCLG)	Traveller accommodation issues.
Development Plan Documents	Documents which outline the key development goals of the
(DPDs)	Local Development Framework.
Gypsy and Traveller	The main document that identifies the accommodation
Accommodation Needs	requirements of Gypsies and Travellers.
Assessment (GTAA)	
Doubling-up	To share a pitch on an authorised site.
Green Belt	A policy or land use designation used to retain areas of
	largely undeveloped, wild or agricultural land surrounding or
	neighbouring urban areas.
Gypsy	Members of Gypsy or Traveller communities. Usually used to
	describe Romany (English) Gypsies originating from India.
0	This term is not acceptable to all Travellers.
Gypsies and Travellers (as used	Consistent with the Housing Act 2004, inclusive of: all
in this report)	Gypsies, Irish Travellers, New Travellers, Showpeople, Circus
	People and Gypsies and Travellers in bricks and mortar
	accommodation.

Homes and Communities	National housing and regeneration agency. Has been					
	National housing and regeneration agency. Has been					
Agency (HCA)	responsible for administering the Gypsy and Traveller Site					
	Grant since 2009/10.					
Local Plan/Local Development	A set of documents which a Local Planning Authority creates					
Framework (LDF)	to describe their strategy for development and use of land i					
	their area of authority.					
Mobile home/Mobiles	Legally classified as a caravan but not usually moveable					
	without dismantling or using a lorry.					
Pitch/plot	Area of land on a site/development generally home to one					
-	licensee household. Can be varying sizes and have varying					
	caravan occupancy levels. Often also referred to as a plot,					
	particularly in relation to Travelling Showpeople. There is no					
	agreed definition as to the size of a pitch.					
Pulling-up	To park a trailer/caravan.					
Regional Spatial Strategy (RSS)	Previous planning approach across England. In July 2010 the					
	government announced its decision to revoke RSSs.					
Settled community/people	Reference to non-Travellers (those who live in houses).					
Site	An authorised area of land on which Gypsies and Travellers					
	are accommodated in trailers/chalets/					
	· · ·					
Static corougn	vehicles. Can contain one or multiple pitches.					
Static caravan	Larger caravan than the 'tourer' type. Can be moved but only					
	with the use of a large vehicle. Often referred to simply as a					
	trailer.					
Stopping place	Locations frequented by Gypsies and Travellers, usually for					
	short periods of time.					
Suppressed/concealed	Households, living within other households, who are unable					
household	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 one.					
Tourer/trailer	Term commonly used by Gypsies and Travellers to refer to a					
	moveable caravan.					
Transit site	Site intended for short stays. Such sites are usually					
	permanent, but there is a limit on the length of time					
	residents can stay.					
Travelling Showpeople	Commonly referred to as Showmen, these are a group of					
	occupational Travellers who work on travelling shows and					
	fairs across the UK and abroad.					
Unauthorised development	This refers to a caravan/trailer or group of caravans/trailers					
	on land owned (possibly developed) by Gypsies and					
	Travellers without planning permission.					
Unauthorised encampment	Residing in caravans/trailers on private/public land without					
	the landowner's permission (for example, at the side of the					
	road, on a car park or on a piece of undeveloped land).					
Van Dwellers	A community usually found living in their vehicles on					
	unauthorised encampments. They are not considered to					
	meet the definition of a Gypsy/Traveller in any national					
	policy.					
Yard	Term used by Travelling Showpeople to refer to a site.					
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Executive Summary

The Study

1. In December 2013 the South Downs National Park Authority - in consultation with Brighton & Hove City Council and the East Sussex District Councils - commissioned the Sustainable Housing & Urban Studies Unit (SHUSU) at the University of Salford to produce an objective assessment of Gypsy and Traveller accommodation need for Brighton & Hove, Eastbourne, Hastings, Lewes, Rother, Wealden and the South Downs National Park. The primary purpose of this report is to provide an evidence base to inform the future development of planning policies through Local Development Plans (LDPs). This assessment analyses need as it currently stands (as of February 2014). It presents the projection of requirements for the following planning periods:

2013/14-2017/18: five years;

• 2018/19-2022/23: five years; and

• 2023/24-2027/28: five years

This report provides the findings for the Brighton & Hove Local Planning Authority (LPA) and the South Downs National Park Planning Authority area within Brighton & Hove. The remaining East Sussex authorities, and the South Downs National Park within those authorities, feature in a separate report.

- 2. The assessment was undertaken by conducting a review of the following data sources:
 - The previous assessment of need and information submitted through the previous regional planning process;
 - The policy and guidance context;
 - The bi-annual Caravan Count;
 - Census 2011 data;
 - Information from the local authority with regards to pitch provision and supply;
 - Information from key stakeholders; and
 - A survey of **51 Gypsies and Travellers** currently residing or stopping in Brighton & Hove, covering a range of accommodation types. The population in Brighton & Hove was found across the following accommodation types: one socially rented transit site; unauthorised encampments; and bricks and mortar accommodation.
- 3. The fieldwork took place between February and April 2014. The base date used in this assessment is 1 February 2014.

Accommodation Need and Supply

- 4. There are no signs that the growth in the Gypsy and Traveller population will slow significantly. Research from the Equalities and Human Rights Commission (EHRC)¹ has stated that around 6,000 additional pitches for Gypsies and Travellers are immediately required to meet the current shortage of accommodation within England.
- 5. This study has taken a thorough assessment of the need arising from all accommodation types present at the time of the survey. As such this assessment of need should be regarded as a robust assessment of need upon which to base planning decisions going forward.
- 6. There is a proposal to develop 12 residential/permanent pitches adjacent to the existing transit site in the study area. This supply has been factored into the need identified in the table below. The development of these pitches will result in a loss of transit pitches (from 23 to 21 pitches):

Table A: Summary of Gypsy, Traveller and Travelling Showpeople Residential Pitch Need (2013/14 – 2027/28)

	Brighton & Hove LPA area Gypsy and Traveller Pitch Need Total (No. of pitches)	SDNP LPA area of Brighton & Hove Gypsy and Traveller Pitch Need Total (No. of pitches)	Travelling Showpeople Pitch Need Total (No. of pitches)
Current authorised residential/ permanent provision (pitches)	0	0	0
Residential need 2013/14 – 2017/18 (pitches)	15	8	0
Residential need 2018/19 – 2022/23 (pitches)	2	2	0
Residential need 2023/24 – 2027/28 (pitches)	2	3	0
Residential need 2013/14 – 2027/28 (pitches)	19	13	0

7. With regards to transit provision, there is currently a transit site in the study area with 23 pitches. Data collected during the assessment suggests that there are an estimated 41 households requiring short stay accommodation over a calendar year. The assessment suggests that the current transit provision in the study area - even with a two pitch reduction - is sufficient to accommodate the households requiring short stay provision. However, there is a need to consider whether additional 'soft' transit provision is required (such as designated stopping places, for example) given

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¹ Brown, P. and Niner, P. (2009) Assessing Local Housing Authorities' Progress in Meeting the Accommodation Needs of Gypsy and Traveller Communities in England: Research Report 13, London: EHRC.

- that a single transit site may not be appropriate for mixing different groups or different motivations for travelling (that is, for work, family or holiday).
- 8. It is recommended that this assessment of accommodation need is repeated in due course (circa 5 years) to ensure it remains as accurate as possible.

1. Introduction

1.1 In December 2013 the South Downs National Park Authority, in consultation with Brighton & Hove City Council and the East Sussex District Councils, commissioned the Sustainable Housing & Urban Studies Unit (SHUSU) at the University of Salford to produce an objective assessment of Gypsy and Traveller accommodation need for Brighton & Hove, Eastbourne, Hastings, Lewes, Rother, Wealden and the South Downs National Park. The primary purpose of this report is to provide an evidence base to inform the future development of planning policies through Local Development Plans (LDPs). This assessment analyses need as it currently stands as of February 2014. It presents the projection of requirements for the following planning periods:

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2018/19-2022/23: five years; and

2023/24-2027/28: five years.

This report provides the findings for the Brighton & Hove Local Planning Authority and the South Downs National Park Planning Authority area within Brighton & Hove. The remaining East Sussex authorities, and the South Downs National Park within those authorities, feature in a separate report.

Background and Scope

1.2 The Housing Act 2004 places a duty upon local authorities to produce assessments of accommodation need for Gypsies and Travellers. In 2005, an East Sussex and Brighton & Hove Gypsy and Traveller Accommodation Assessment (GTAA) was undertaken to look at accommodation needs across the county. The 2005 GTAA report presented an estimate of 80 additional pitches for Brighton & Hove and East Sussex for the 2006-2011 period. However, the assessment pre-dated the DCLG guidance on carrying out GTAAs² and this requirement did not differentiate between residential and transit pitch need. Benchmarking of GTAAs carried out for the South East England Regional Assembly indicated that this figure was likely to have overstated requirements.³ In light of the benchmarking, the local authorities reexamined and made adjustments to their figures, concluding that an additional 47 permanent pitches were required over the 2006-2011 period. It was also concluded that no additional pitches would be required up to 2016 based on future pitch requirements being offset by future moves from sites to bricks and mortar.⁴ However, it was suggested that such figures should be kept under review. The previous GTAA did not cover Travelling Showpeople. Consequently separate

² DCLG (2007) *Gypsy and Traveller Accommodation Assessments: Guidance*, London: HMSO.

³ CURS, SHUSU and CRESR (2008) South East England Regional Assembly, South East Plan Partial Review: Gypsies, Travellers and Travelling Showpeople: GTAA Benchmarking and Audit of Advice - Final Summary Report.

⁴ Joint Evidence Paper: Provision for Gypsies and Travellers in East Sussex, available at: http://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/EP058%20Joint%20Evidence%20Paper%20-%20Gypsies%20%26%20Travellers%20Provision.pdf

⁵ See footnote 3.

- consultation was carried out by East Sussex County Council with the Showmen's Guild, which suggested that there were no additional requirements in East Sussex.
- 1.3 The submitted version of the Partial Review of the South East Plan contained proposals for 55 pitches for East Sussex and Brighton & Hove. The additional 8 pitches were allocated through a regional redistribution approach which aimed to share requirements more evenly across the South East. The requirements by the local authority were as follows: Brighton & Hove (13); Eastbourne (three); Hastings (two); Lewes (10); Rother (seven); and Wealden (20). The Regional Assembly also made an allocation of nine plots for Travelling Showpeople across the study area.
- 1.4 Following the abolition of the Regional Strategies, the East Sussex authorities indicated that they wanted to conclude the work started in the Partial Review, taking a 'localist' approach to reassessing need. This approach advocated meeting need where it arises rather than a 'top down' regional distribution of requirements. Taking the previous GTAA, the benchmarking exercise and the local knowledge of the authorities, the suggested residential pitch requirements for 2006-2016 were as follows: Brighton & Hove (16); Eastbourne (one); Hastings (three); Lewes (13); Rother (seven); and Wealden (32). The requirements for Travelling Showpeople were assumed to be nil, based on consultation with the Showmen's Guild.

Assessment Approach

- 1.5 The approach to this study involved bringing together various existing data sources with empirical research with the Gypsy and Traveller communities across the administrative area of Brighton & Hove. Details about the methodology for the assessment can be found in Appendix 1. The methodology entailed a review of the following data sources:
 - Previous assessments of need and information submitted through the earlier regional planning process;
 - The policy and guidance context;
 - The bi-annual Caravan Count;
 - Census 2011 data;
 - Information from the local authority with regards to pitch provision and supply;
 - Information from key stakeholders. These included officers from within Brighton & Hove City Council, East Sussex County Council, the South Downs National Park Authority and West Sussex County Council, as well as representatives from health, the Police, Sussex Travellers Action Group (STAG), the Showmen's Guild of Great Britain and Friends, Families and Travellers (FFT). Consultations written and verbal were undertaken in order to develop a clearer understanding about the context of provision and need within the area and to help inform the assessment of need. This information has been incorporated into this report in the appropriate places; and

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⁶ See fn 4.

- A survey of Gypsies and Travellers currently residing or stopping in Brighton &
 Hove. This entailed the completion of interviews with 51 Gypsy and Traveller
 households living in trailers and in bricks and mortar properties.
- 1.6 The key points to note from the methodological approach adopted are that:
 - Due to the size of the sample it is reasonable to gross up findings from the survey to the total population of Gypsies, Travellers and Travelling Showpeople in Brighton & Hove;
 - Two pitch requirement figures are provided: one for the Local Planning Authority area of Brighton & Hove and one identifying pitch requirements that fall within the South Downs National Park Planning Authority Area within Brighton & Hove. This reflects a pragmatic need to apportion pitch requirements between the two local planning authorities for plan making purposes. In reality, both planning authorities will need to work together to address the identified need (see Chapter 10 for a description of how the survey findings have been translated into accommodation need).

Structure of the Report

- 1.7 This report is intended to assist Brighton & Hove City Council and the South Downs National Park Authority in its formulation of planning policies for the provision of accommodation for the Gypsy, Traveller and Travelling Showpeople communities. It sets out the background and current policy context, identifies the estimated Gypsy, Traveller and Travelling Showpeople population and presents evidence of need arising within the study area. The report is structured as follows:
 - Chapter 2 looks at the past, present and emerging policy context in the area of Gypsy, Traveller and Travelling Showpeople accommodation;
 - Chapter 3 looks at the trends in caravan numbers evident from the bi-annual count of caravans and presents an estimate as to the size of the local Gypsy, Traveller and Travelling Showpeople population;
 - Chapter 4 provides information on residential site provision based on information given by Brighton & Hove City Council and other key stakeholders;
 - **Chapter 5** looks at the presence of unauthorised encampments in the study area and the views of households stopping on unauthorised sites;
 - Chapter 6 focuses on the numbers of Gypsies and Travellers living in bricks and mortar accommodation as well as drawing upon the views of people obtained through the household survey;
 - Chapter 7 looks at Travelling Showpeople specifically;
 - Chapter 8 looks at transit provision in the study area and the views of households stopping on the transit site;
 - Chapter 9 covers a range of issues including the movement intentions of the sample, the formation of new households and concealment of existing ones and the accommodation preferences of the Gypsy and Traveller population;

- **Chapter 10** provides the numerical assessment of residential accommodation need for Brighton & Hove and the South Downs National Park Authority;
- Chapter 11 presents the assessment of transit accommodation need; and
- Chapter 12 provides some relevant conclusions in relation to the assessment.
- 1.8 The base date for this assessment is 1 February 2014. Provision made after this date will contribute to the need identified in this report.

2. Policy Context

2.1 This chapter looks at the current and past housing and planning policy context impacting on the assessment of need and the provision of accommodation for Gypsies, Travellers and Travelling Showpeople.

National Policy 2006-2011

- 2.2 The main document for detailing planning policy in England over the 2006-2011 period was ODPM Circular 01/2006 *Planning for Gypsy and Traveller Caravan Sites*. This specified that the aims of legislation and policy were to:
 - Ensure that Gypsies and Travellers have fair access to suitable accommodation, education, health and welfare provision;
 - Reduce the number of unauthorised encampments and developments;
 - Increase significantly the number of Gypsy and Traveller sites in appropriate locations and with planning permission in order to address under-provision by 2011;
 - Protect the traditional travelling way of life of Gypsies and Travellers and underline the importance of assessing accommodation need;
 - Promote private site provision; and
 - Avoid Gypsies and Travellers becoming homeless, where eviction from unauthorised sites occurs and where there is no alternative accommodation.
- 2.3 The circular directed local authorities to assess needs through Gypsy and Traveller Accommodation Assessments which should then form part of the evidence base for subsequent Development Plan Documents.
- 2.4 Travelling Showpeople were the subject of separate planning guidance DCLG Circular 04/07 which aimed to ensure that the system for pitch assessment, identification and allocation as introduced for Gypsies and Travellers was also applied to Travelling Showpeople.

Current National Planning Policy

- 2.5 In March 2012 the government published the National Planning Policy Framework (NPPF) for England and Wales. This Framework represents a core aspect of the Government's reforms to the planning system to make it less complex and more accessible, to protect the environment and to promote sustainable growth.
- 2.6 In tandem with the publication of the NPPF, the Government published a new Planning Policy Statement for Traveller Sites (PPTS) and the two documents should be read in conjunction. The PPTS replaces Circulars 01/06 and 04/2007.

2.7 Paragraph 3 of this PPTS states that the Government's overarching aim is to:

Ensure fair and equal treatment for Travellers, in a way that facilitates the traditional and nomadic way of life of Travellers while respecting the interests of the settled community.

- 2.8 Further detail on this overarching aim is subsequently provided in paragraph 4 which states that the Government's aims for Traveller sites are:
 - That local planning authorities should make their own assessment of need for the purposes of planning;
 - To ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites;
 - To encourage local planning authorities to plan for sites over a reasonable timescale;
 - That plan-making and decision-taking should protect Green Belt from inappropriate development;
 - To promote more private Traveller site provision while recognising that there will always be those Travellers who cannot provide their own sites;
 - That plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective;
 - For local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies;
 - To increase the number of Traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply;
 - To reduce tensions between settled and Traveller communities in plan-making and planning decisions;
 - To enable provision of suitable accommodation from which Travellers can access education, health, welfare and employment infrastructure; and
 - For local planning authorities to have due regard to the protection of local amenity and local environment.
- 2.9 Under *Policy A*, the PPTS sets out that local planning authorities should use evidence to plan positively and manage development and that local planning authorities (LPAs) should consider the following in developing the evidence base:
 - A. Pay particular attention to early and effective community engagement with both settled and Traveller communities (including discussing Travellers' accommodation needs with Travellers themselves, their representative bodies and local support groups);

- B. Co-operate with Travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of the likely permanent and transit accommodation needs of their areas over the lifespan of their development plan working collaboratively with neighbouring local planning authorities; and
- C. Use a robust evidence base to establish accommodation needs to inform the preparation of local plans and make planning decisions.
- 2.10 Under *Policy B* which refers to 'Planning for Traveller Sites' the PPTS states that LPAs should set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople to meet needs in their area, working collaboratively with neighbouring planning authorities. Paragraph 9 in this policy states that LPAs should, in producing their Local Plan:
 - A. Identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets;
 - B. Identify a supply of specific, developable sites or broad locations for growth, for years six to ten and, where possible, for years 11-15;
 - C. Consider production of joint development plans that set targets on a crossauthority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a duty to cooperate on planning issues that cross administrative boundaries);
 - E. Relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density; and
 - F. Protect local amenity and environment.
- 2.11 Paragraph 10 notes that criteria should be set out to guide land supply allocations where there is an identified need. It states that:

Criteria should be set to guide land supply allocations where there is identified need. Where there is no identified need, criteria-based policies should be included to provide a basis for decisions in case applications nevertheless come forward. Criteria based policies should be fair and should facilitate the traditional and nomadic life of Travellers while respecting the interests of the settled community.

2.12 At the time of report writing, the Government had issued a consultation exercise on proposed changes to the planning policy statement and guidance. In the published consultation document, the Government has set out a number of changes with the stated aim of "ensuring fairness in the planning system; and strengthening protection of our sensitive areas and Green Belt". Although the changes would apply to the settled community, the consultation document acknowledges that the proposals primarily relate to Gypsy and Traveller sites.

⁷ DCLG (2014) *Consultation: Planning and Travellers*, available at: https://www.gov.uk/government/consultations/planning-and-travellers-proposed-changes-to-planning-policy-and-guidance.

Consultation on the proposed changes went beyond the timeframe for this assessment - ending in November 2014- and any subsequent changes to policy as a result of this consultation may impact on the need figures and associated issues identified in this report.

Regional Planning Policy

2.13 Regional Strategies were formally abolished in the Localism Act (2011) which received Royal Assent on 15 November 2011. However, it has been made clear that the evidence base used to compile these strategies can still be used to inform the development of Local Plans as appropriate. Specific guidance is provided in terms of Gypsy and Traveller needs, this states that:

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

Local Planning Policy

2.14 Policies HO16, HO17 and HO18 of the adopted Brighton & Hove Local Plan 2005 cover Gypsy, Traveller and Travelling Showpeople communities. These policies are currently 'saved' until the emerging Brighton & Hove City Plan Part One is adopted. Policy CP22 in the Brighton & Hove City Plan Part One relates specifically to 'Traveller Accommodation':

Table 2.1: Local Policies Relating to Gypsies, Travellers and Travelling Showpeople

Policy HO16: Safeguarding Existing	Existing Gypsy/Travellers' sites will be safeguarded. Proposals that would result in the loss of all or part of an existing site will				
Gypsy and/or Traveller Sites	be refused unless:				
(Brighton & Hove Local Plan 2005)	a. the local planning authority is satisfied that the need for the provision of the site no longer exists; or				
	b. the proposal complies with the policies in the development plan and a replacement Gypsy/Traveller site is to be provided in a suitable location.				

⁸ Chief Planner (2012) DCLG Chief Planning Officer Letter: Revocation of Regional Strategies (6th July).

Policy HO17: Sites for Gypsies and/or Travellers

(Brighton & Hove Local Plan 2005)

Proposals for new Gypsy and/or Travellers' sites or extensions to existing sites, will be permitted provided they comply with the other policies in the development plan and that all of the following criteria can be satisfied:

- a. they would not significantly detract from the character and appearance of the surrounding area;
- they would not result in uses which would adversely affect the residential amenity of nearby properties, in particular by reason of noise, fumes and dust arising from vehicular movements and the storage of machinery and materials;
- a convenient and safe means of access can be provided to serve the site and the surrounding highway network is adequate to serve the use; and
- the site is readily capable of being serviced, and is within a reasonable distance of local services and facilities e.g. shops and schools.

Where necessary conditions will be imposed or a planning obligation sought in order to control the future use of the site e.g. the type of site and/or number of days a caravan can stay, plus to regulate the proportion of the site which may be used for commercial operations and/or hours of work, as appropriate.

Policy HO18: Sites for Travelling Showpeople

(Brighton & Hove Local Plan 2005)

Proposals for sites for Travelling Showpeople, who are members of the Showmen's Guild of Great Britain, will be permitted in accordance with the other policies in the Development Plan, provided that all of the following criteria can be satisfied:

- a. the development would not significantly detract from the character and appearance of the surrounding area;
- the development would not result in uses which would adversely affect the residential amenity of nearby properties, in particular by reason of noise, fumes and dust arising from vehicular movements and the storage of machinery and materials and the testing of equipment;
- a convenient and safe means of access can be provided to serve the site and the surrounding highway network is adequate to serve the use;
- the site is readily capable of being serviced, and is within a reasonable distance of local services and facilities e.g. shops and schools; and
- e. the development is sited on reasonably flat land and does

not visually encroach into the open countryside.

Where necessary, conditions will be imposed or a planning obligation sought in order to control the future use of the site and to regulate the proportion of the site that may be used for commercial operations and/or hours of work/testing equipment, as appropriate.

Policy CP22: Traveller Accommodation

Provision will be made to meet the city's needs for permanent and transit traveller accommodation.

(Brighton & Hove Submission City Plan Part One February 2013)

- The council will seek to deliver 18 permanent pitches to meet assessed requirements to 2019;
- b) Traveller accommodation needs will be reviewed to cover the remaining plan period to 2030;
- Additional or outstanding pitch requirements will be facilitated through site allocations in Part 2 of the City Plan or through joint Development Plan working with adjacent local planning authorities; and
- An early review of this policy may be required to incorporate pitch requirements over the full plan period.

In assessing the suitability of new traveller sites (or extensions to existing sites), the local planning authority will have regard to the following planning considerations and will need to be satisfied that:

- i) there is safe and convenient access to the road network;
- ii) there is satisfactory access to local services and facilities (including health services, GPs, schools, shops);
- the potential for noise and other disturbance from the movement of vehicles to and from the site and any on-site business activities is not detrimental to the character and appearance of surrounding areas;
- iv) there is scope for appropriate landscaping and planting to help give structure and privacy and to maintain visual amenity;
- there is capacity to provide the necessary physical and social infrastructure (water, electricity, drainage, sanitation, play areas); and
- vi) the location of sites will not compromise the essential features of designated areas of landscape, historical or nature conservation protection including the South Downs National Park.

The following locations should be avoided:

- Sites on or near to significantly contaminated land, industrial processes or other hazards where there would be a detrimental effect on the general health and well-being of residents;
- Sites in areas of high flood risk; and
- SACs, SPAs, Ramsar Sites⁹ and other areas with internationally recognised designations.

Existing traveller sites will be safeguarded. Proposals that would result in the loss of all or part of an existing site will be refused unless:

- a) the local planning authority is satisfied that the need for the provision of the site no longer exists; or
- b) the proposal complies with the policies in the development plan and a replacement site is to be provided in a suitable location.
- 2.15 With regards to the South Downs National Park Authority, the current development plan is broken down into the constituent districts, boroughs and unitary areas. This includes jointly developed Core Strategies and 'old' local plans which the South Downs National Park Authority inherited on 1 April 2011 when they became the Planning Authority for the Park.
- 2.16 Cumulatively, the policy context outlined in this chapter makes it clear that there is a fundamental need for LPAs to understand and plan for the needs of Gypsy, Traveller and Travelling Showpeople communities. This represents an integral part of the evidence base upon which Local Plans should be developed in order to be found sound.
- 2.17 Furthermore, in 2012, Brighton & Hove City Council published its *Traveller Commissioning Strategy*. ¹⁰ This strategy had the following aims:
 - Reduce the number of unauthorised encampments by making proper provision for well managed stopping places for Travelling communities such as through the provision of a permanent site;

⁹ SPAs [Special Protection Areas], SACs [Special Areas of Conservation] and Ramsar sites are designated under European legislation. SACs protect various types of habitat, while SPAs and Ramsar sites protect birds and their habitats.

¹⁰ Brighton & Hove City Council (2012) *Traveller Commissioning Strategy 2012: Balancing the Needs of Traveller Communities and the City's Settled Communities*, available at: http://www.brighton-hove.gov.uk/content/housing/travellers

- Improve educational attainment within local travelling communities;
- Improve health, safety and wellbeing amongst local Travelling communities;
- Improve community cohesion by increasing awareness and understanding between travelling communities and residents of the city;
- Reduce the incidence of unauthorised encampments on the city's parks and open spaces;
- Tackle domestic and sexual violence, anti-social behaviour and nuisance; and
- Reduce racism, prejudice and hate crime.
- 2.18 An update document was produced one year after the strategy was produced outlining progress towards the above aims. ¹¹ This included actions detailing improvements in relation to the response to unauthorised encampments; working with the South Downs National Park Authority on the submission of a planning application for a 12 pitch permanent site (see Chapter 4); a Traveller Health Needs Assessment; and improvements in Early Years provision.
- 2.19 In Brighton & Hove there is also a population known locally as 'Van Dwellers'.

 Brighton & Hove City Council Traveller Commissioning Strategy (2012: 138)¹²
 refers to this population as follows:

Van Dwellers are usually found living in their vehicles on the roadside or on unauthorised encampments and are generally not nomadic. They are not considered to meet the definition of a Traveller in any national policy as collectively they are not a recognised ethnic group nor are they considered New Travellers as they are effectively permanently resident in the city, such as through work or education.

2.20 The Traveller Commissioning Strategy 2012 indicates that lived-in vehicles are an issue for the City. Consultation with Brighton & Hove City Council suggested that there have sometimes been tensions between Gypsy and Traveller populations (for example, Irish Travellers) and Van Dwellers. Under the brief for this assessment, this report does not include the accommodation needs of the Van Dweller population in Brighton & Hove.

¹¹ Brighton & Hove City Council (2013) *One Year On: The Traveller Commissioning Strategy in Action 2012/13*, available at:

http://www.brighton-hove.gov.uk/content/housing/travellers

¹² http://present.brighton-

 $[\]frac{hove.gov.uk/Published/C00000117/M00003267/Al00025629/\$20120312172648~001823~0006287~Traveller Commissioning Strategy 2012 final. doc A.ps.pdf}{}$

Defining Gypsies and Travellers

- 2.21 Defining Gypsies and Travellers is not straightforward. Different definitions are used for a variety of purposes. At a very broad level the term 'Gypsies and Travellers' is used by non-Gypsies and Travellers to encompass a variety of groups and individuals who have in common a tradition or practice of nomadism. More narrowly both Romany Gypsies and Irish Travellers are recognised minority ethnic groupings.
- 2.22 At the same time Gypsies and Travellers have been defined for accommodation and planning purposes. The statutory definition of Gypsies and Travellers for Gypsy and Traveller Accommodation Assessments required by the Housing Act 2004 is:
 - a) Persons with a cultural tradition of nomadism or of living in a caravan; and
 - b) All other persons of a nomadic habit of life, whatever their race or origin, including:
 - Such persons who, on grounds only of their own or their family's or dependants' educational or health needs or old age, have ceased to travel temporarily or permanently; and
 - b. Members of an organised group of travelling showpeople or circus people (whether or not travelling together as such).
- 2.23 The 2012 PPTS contains a separate definition for planning purposes which offers a narrower definition and excludes Travelling Showpeople:

Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

- 2.24 This definition focuses more narrowly upon people who either still travel or have ceased to do so as a result of specific issues and can as a consequence demonstrate specific land use requirements.
- 2.25 A separate definition of Travelling Showpeople is also provided:

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 or permanently, but excludes Gypsies and Travellers as defined above.

- 2.26 The 2012 PPTS policy document uses the term 'Traveller' to refer to both Gypsy and Traveller communities and populations of Travelling Showpeople. This has been used as it is recognised that this definition is "more pragmatic and wider and enables local planning authorities to understand the possible future accommodation needs of this group and plan strategically to meet those needs". 13 However, the study has also taken into consideration the planning definition where it is considered appropriate to do so.
- 2.27 As highlighted above, at the time of this assessment, the Government is consulting on proposed changes to planning policy and guidance. ¹⁴ It proposes changing the planning definition so that it includes only those who travel. As above, any change to policy may impact on the assessed need and issues identified in this report.

Housing and Accommodation Need

- 2.28 Crucially, for Gypsies and Travellers, the definition of housing need is varied slightly to acknowledge the different contexts in which members of these communities live. The general definition of housing need is "households who are unable to access suitable housing without some financial assistance", with housing demand defined as "the quantity of housing that households are willing and able to buy or rent."¹⁵
- 2.29 In recognising that in many cases these definitions are inappropriate for Gypsies and Travellers, the guidance on producing GTAAs¹⁶ refers to distinctive requirements that necessitate moving beyond the limitations of the definition for both caravan dwellers and those in bricks and mortar housing. For caravan dwelling households, need may take the form of:¹⁷
 - those who have no authorised site on which to reside;
 - those whose existing site accommodation is overcrowded or unsuitable, but who are unable to obtain larger or more suitable accommodation; and
 - those who contain suppressed households who are unable to set up separate family units and are unable to access a place on an authorised site, or obtain or afford land to develop one.
- 2.30 In the context of Traveller households living in bricks and mortar accommodation, need may take the form of "those whose existing accommodation is overcrowded or unsuitable (including unsuitability by virtue of psychological aversion to bricks and mortar accommodation)".

https://www.gov.uk/government/consultations/planning-and-travellers-proposed-changes-to-planning-policy-and-guidance.

¹³ DCLG (2011) Planning for Traveller Sites: Consultation Paper - April, London: HMSO. Available at: http://www.communities.gov.uk/documents/planningandbuilding/pdf/1886164.pdf

¹⁴ DCLG (2014) Consultation: Planning and Travellers, available at:

ODPM (2006) Definition of the Term 'Gypsies and Travellers' for the Purposes of the Housing Act 2004: Consultation Paper - February, London: HMSO.

¹⁶ GTAA guidance has been used in developing the methodology but variations to the approach have been made to take account of local circumstances, where considered appropriate.

¹⁷ DCLG (2007) Gypsy and Traveller Accommodation Needs Assessments: Guidance, London: HMSO.

- 2.31 The needs presented in this report reflect both the definition of Gypsies and Travellers as used in the Housing Act 2004, which gives an overall strategic level of accommodation need, and the definition in the 2012 PPTS policy which indicates the proportion of site-based need for operational purposes. It should also be noted that steps have been taken within this report to analyse need in the context of local and historic demand.
- 2.32 Housing need is assessed at the level of a single family unit or household (broadly a group of people who regularly live and eat together). On Gypsy and Traveller sites, this is assumed to equate to a 'pitch'; and in housing, to a separate dwelling.

Defining a Pitch

- 2.33 There is no set definition for what constitutes a Gypsy, Traveller and Travelling Showpeople residential pitch (or plot for Travelling Showpeople). In the same way as in the settled community, Gypsies, Travellers and Travelling Showpeople require various accommodation sizes depending on the number of family members.
- 2.34 The convention used in this report is that a pitch is the place on a Gypsy and Traveller site accommodating a single family/household. The number of caravans that a household uses can be a single unit (trailer, touring caravan, static, or chalet, for example) or more. In order to ensure comparability across accommodation types it is important to determine a convention when translating caravan numbers into pitches/households. Following the convention used in previous GTAAs, and an approach advocated by DCLG guidance, this study uses a 1.7 caravan to pitch ratio unless otherwise stated.

Conventions

- 2.35 A number of conventions are followed in this report:
 - Percentages in text and tables are rounded to the nearest whole number; this
 means that they do not always sum to exactly 100;
 - 'Quotes' included from Gypsies and Travellers are distinguished by being in italic type and usually inset;
 - The terms 'respondents' and 'households' are used interchangeably throughout this report. The respondent is the person who was interviewed who represented the needs of a particular household in the responses they provided; and
 - As highlighted above, one pitch is assumed to accommodate a single household. The assessment therefore refers to 'need' in terms of pitches/households.

3. Baseline Information on the Gypsy and Traveller Population

3.1 This chapter looks at the Count of Gypsy and Traveller Caravans in order to present what is known about Gypsies and Travellers within the Brighton & Hove area. The Caravan Count is a dataset collected bi-annually for all Local Authorities in England and follows a method prescribed by Central Government.

Caravan Numbers and Trends from the Caravan Count

- 3.2 The bi-annual Caravan Count provides a snapshot of the local context in terms of the scale and distribution of caravan numbers across the study area. Indeed, in the absence of other datasets it is virtually the only source of information on Gypsy and Traveller caravan data. However, there are well documented issues with the robustness of the count. Such issues include: the 'snapshot' nature of the data; the inclusion of caravans and not households; the exclusion of Travelling Showpeople; and the exclusion of Gypsies and Travellers in bricks and mortar accommodation. The analysis contained in this report, which is based on information supplied by the local authority, key stakeholders and a survey of Gypsy and Traveller households, therefore represents a more robust assessment of the current situation than would be the case if only the Caravan Count were used.
- 3.3 Using the information from the Caravan Count from January 2006 to the latest published count of January 2014, Table 3.1 and Figure 3.1 below provides the distribution of caravan numbers for Brighton & Hove since January 2006. Data from the Caravan Count indicates the following:
 - The largest numbers of caravans are recorded on unauthorised encampments with the remainder on socially rented sites (referring to Horsdean transit site). There are regular peaks and troughs in caravans on unauthorised encampments and on the transit sites, although the underlying trend for unauthorised encampments is up;
 - The number of caravans on the transit site has increased since January 2009 and shows less fluctuation than previously between July 2010 and January 2013, though it is by no means stable. Since the peak in January 2012 the number of caravans on the Horsdean transit site has decreased and none were recorded in the 2013 count; and
 - Other than the underlying trend increasing, there is very little pattern visible in the unauthorised encampments. Higher numbers of caravans tend to be counted in July and lower numbers in January, though that is not always the case (such as the recorded low in July 2012):

¹⁹ The January 2011 count included a count of Travelling Showpeople caravans for the first time.

¹⁸ Niner, P. (2002) Review of the ODPM Caravan Count, London: ODPM.

Table 3.1: Caravan Numbers Across Accommodation Types within Brighton & Hove 2006 - 2013

	Authorised sites (with planning permission)				Unauthorised sites (without planning permission				
		Private			Unauthorised developments		Unauthorised encampments		
Count	Socially rented	Temporary permission	Permanent permission	All private	'Tolerated'	'Not tolerated'	'Tolerated'	'Not tolerated'	Total
Jan 2014	5	0	0	0	0	0	7	31	43
July 2013	0	0	0	0	0	0	34	34	68
Jan 2013	16	0	0	0	0	0	0	51	67
July 2012	18	0	0	0	0	0	0	20	38
Jan 2012	35	0	0	0	0	0	0	59	94
Jul 2011	20	0	0	0	0	0	35	38	93
Jan 2011	19	0	0	0	0	0	41	0	60
Jul 2010	24	0	0	0	0	0	0	52	76
Jan 2010	0	0	0	0	0	0	19	28	47
Jul 2009	23	-	-	0	0	0	0	33	56
Jan 2009	0	-	-	0	0	0	0	30	30
Jul 2008	4	-	-	0	0	0	17	9	30
Jan 2008	8	-	-	0	0	0	8	29	45
Jul 2007	0	-	-	0	0	0	0	65	65
Jan 2007	0	-	-	0	0	0	6	14	20
Jul 2006	14	-	-	0	0	0	0	47	61
Jan 2006	4	-	-	0	0	0	0	0	4

Source: DCLG

2014 100 90 80 70 60 Socially rented 50 Private 40 Unauthorised developments 30 —— Unauthorised encampments 20 -Total 10 0 Jan 2011 July 2012 Jul 2008 Jan 2009 Jul 2009 Jan 2010 Jan 2012 Jul 2010 Jan 2013 July 2013 Jan 2008 Jan 2014

Figure 3.1: Caravan Numbers Across Accommodation Types within Brighton & Hove 2006 - 2014

Source: DCLG

3.4 In order to provide more specific information on the local Gypsy and Traveller population, the remaining chapters draw upon the information provided by Brighton & Hove City Council and the South Downs National Park Authority on site provision in the study area, the views of stakeholders as well as information obtained through a survey of Gypsy and Traveller households.

4. Residential Sites

4.1 This chapter provides a discussion on residential Gypsy and Traveller sites across the study area, drawing on information provided by the Council and other key stakeholders.

Authorised Residential Private Sites

4.2 There were no authorised private sites in Brighton & Hove at the time of the assessment. This has not changed over the last five years and the Council did not expect this number to increase over the next five years.

Residential Socially Rented Sites

4.3 There were no socially rented residential sites in Brighton & Hove at the time of the assessment (there was one transit site, which is discussed in Chapter 8). The Council indicated that since 2006 there has only been one planning application for the development of a Gypsy and Traveller site. This site is at Horsdean where planning permission was granted in February 2014 for 12 permanent pitches. The development of these pitches will lead to a reduction of two pitches on the Horsdean transit site (from 23 to 21 pitches).

Unauthorised Developments

4.4 There were no unauthorised developments in Brighton & Hove at the time of the assessment. This has not changed over the last five years and the Council did not expect this number to increase over the next five years.

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²⁰ Application Reference Number 13/04626/FUL.

5. Unauthorised Encampments

- 5.1 This chapter provides a discussion on unauthorised encampments across Brighton & Hove, drawing on information provided by the Council and other key stakeholders, together with the survey results from interviews with Traveller households stopping on unauthorised encampments.
- 5.2 The presence and incidence of unauthorised encampments is often a significant issue that impacts upon local authorities, landowners, Gypsies and Travellers and the settled population. Nationally the worst living conditions are commonly experienced by Gypsies and Travellers living on unauthorised encampments who do not have easy access to water or toilet facilities and have difficulties in accessing education and health services (see survey analysis below for examples of this). Stakeholder consultation suggested that unauthorised encampments are sometimes an area of tension in particular parts of the City, with local media sometimes reporting in a negative or critical manner.
- 5.3 The Council indicated that it is party to a Joint Working Protocol with other agencies in relation to managing unauthorised encampments. Staff from the Traveller Liaison Team and the Police make joint visits to new encampments within 24 hours. The Council highlighted the following good practice in relation to managing unauthorised encampments (as well as working with Gypsy and Traveller communities more broadly):

We work closely with the Police and have a Police Traveller Liaison Officer for Brighton and Hove; there are several other Gypsy Traveller Police and Community Support Officers who work with Travellers and provide support to carry out visits in the busy summer months. We have recently drafted a joint protocol to manage unauthorised encampments that sets out to formalise how we work with other enforcement agents in the Council, such as waste enforcement and Trading Standards, as well as with the Police. We are also working on a Support Protocol for working with all support agencies in the City in relation to Travellers. We already have a multi-agency approach to managing unauthorised encampments, and our transit site, with both the enforcement agencies, as well as with the support agencies, Traveller Education and Health (there is a Health Visitor and midwife position working with Travellers), but we are looking to formalise these procedures. We have regular (weekly in the summer) multi-agency meetings to effectively manage unauthorised encampments.

As seen in Chapter 3, unauthorised encampments have been a regular feature of the Caravan Count. Some of these were relatively large, though they have sometimes been tolerated. The Council indicated that they keep a log of all known unauthorised encampments. For the purpose of this assessment, the Council provided figures for unique or unidentified households for 2011 (91 households), 2012 (76 households) and 2013 (107 households). This is an average of **91 households**. In order to assess these figures, the Council removed double counting from the data - that is, where the same household occupied multiple encampments in the area - and also removed

known Van Dweller encampments from the data. The Council stated that, on average, there were two encampments in the area at any point in time. The number and size of encampments had remained broadly the same over the last five years: the only change that was noted related to the location of encampments, with more being recorded on City Parks. The Council felt that this was due to other land that had previously been used as stopping places no longer being available. Stakeholder consultation suggested that encampments on City Parks were particularly problematic because they are public open spaces for recreation. Stakeholder interviewees suggested that such encampments often draw criticism from the general population. The Council indicated that they were unsure whether the number of encampments would increase, decrease or stay the same over the next five years.

- 5.5 There were reportedly more encampments during the summer, although information provided by the Council showed that encampments occurred all year round. Information provided by the Council suggested that there was a relatively equal mix of people who were 'local' stopping on encampments and those who were 'in transit' (i.e. passing through or visiting the area). It was very rare for encampments to have horses with them.
- 5.6 The Council also indicated that they had a 'Toleration Procedure' with regards to unauthorised encampments. This Procedure states that:

Toleration of an encampment when appropriate will consist of an agreed period of occupation of an individual piece of Council-owned land by an agreed number of households as appropriate. The decision on length of stay and number of households will be determined on a case-by-case basis, taking into account all relevant information on the land and the individuals concerned...During the initial joint visit Traveller Liaison Officers will gather information, make assessments about the encampment and make health & welfare checks on the members of the encampment. This will inform the decision making process with regard to toleration of the site. The following information must be collected at this time:

- Location of encampment;
- Layout of encampment;
- Number of households;
- Number of trailers; and
- Health and Welfare requirements of members of the encampment.

Survey Findings: Unauthorised Encampments

5.7 A total of 14 households were interviewed on three separate unauthorised encampments that occurred during the study period. Two of these interviews were on an encampment that occurred within the South Downs National Park area. With regards to ethnicity, 11 respondents were Irish Travellers and three were Romany Gypsies.

The respondents ranged in age from 17 to 59, with the majority being aged 25-39. Household size ranged from one to six. There were 47 people across the 14 households; an average of 3.4 people per household. A total of 10 households indicated that they had children. Amongst the households there were 24 children; 2.4 children per household.

Views on Size and Facilities

5.9 The respondents indicated that they had a single caravan, with the exception of one who had two trailers. The average number of caravans to households was 1:1. Three reported that they did not have enough space. When asked to elaborate, they indicated that they needed more, or larger, caravans. One respondent also indicated that they "would like to be on a site".

Reasons for Moving to the Encampment and the Local Authority Area

- 5.10 When asked why they were stopping on their current encampment, eight respondents (57%) stated that it was due to a lack of sites; two respondents wanted to be near family; two had been evicted from their last accommodation; one wanted to be near friends; and one was stopping on the encampment for children's education.
- 5.11 When asked why they were in the Brighton & Hove area, seven respondents stated that they have family in the area; two indicted that they were born/raised in the area; one stated that there was work available in the area; one was there for children's education; one stated that they "call Brighton their home"; and one stated "we just like Brighton" (the remaining respondent did not provide a reason).

Length of Time in the Area and on the Encampment

- 5.12 When asked how long they had been in Brighton & Hove, nine respondents (64%) indicated that they had been in the area for 10 years or more, with an additional respondent being in the area for between five and 10 years. The remaining respondents indicated that they had been there less than 12 months. Eight respondents stated that they were permanent residents in the area; three stated that they were visitors; and one did not know if they were visitors or permanent (the remaining two did not provide a response). The longer-term residence of some households was also reiterated during the stakeholder consultation, with stakeholders suggesting that in some cases households had been in the area for around 20 years.
- 5.13 With regards to length of time on their current encampment, all respondents had been there for less than a month, with 11 indicating that they had been on their current encampment less than a week. One respondent indicated that they had a base elsewhere (this was a socially rented site outside the study area).

Previous Accommodation Experiences

5.14 With regards to the type of accommodation respondents had before their current encampment, nine respondents (64%) indicated they had been stopping on another unauthorised encampment; two had been stopping on a transit site; one had been living in bricks and mortar accommodation; one respondent had come from a private site; and one from a Council site. Nine respondents (64%) indicated that their previous accommodation had been within Brighton & Hove (specifically Brighton), while one respondent had been in another area of East Sussex (Lewes). The remaining respondents had come from outside the East Sussex area (from London and Surrey). None of the respondents had ever lived in bricks and mortar accommodation.

Travelling Experiences

- 5.15 With regards to travelling experiences, eight respondents (57%) indicated that they travel or move every week or so; three respondents moved a few times a year; two travel or move every month or so; and one every day or so. Twelve respondents had travelled in the last 12 months. When asked where they tended to go, the majority of respondents stated that they visited fairs (for example, Appleby and Stow). A small number of households indicated that they travelled around Brighton, with some also visiting other areas of the country (for example, Kent and Ireland).
- 5.16 With regards to where peopled stayed while travelling in the last 12 months, those who attended the fairs stayed at designated fair sites. Following fair sites, people made reference to staying with family on Council and private sites, staying on transit sites, roadside, farmers' fields and caravan parks

Site Needs Relating to Work

- 5.17 The households were primarily self-employed. A small number of respondents (three) indicated that they or someone within their household was unemployed but looking for work. None of the respondents indicated that they had any current or future site needs relating to their work.
- 5.18 With regards to where people worked, nine respondents (64%) were working within Brighton & Hove. Smaller numbers made reference to also working in Eastbourne, Hastings, Lewes, Rother and Wealden as well. None of the respondents referred to places outside the East Sussex area. Six respondents indicated that they worked in areas that were within the South Downs National Park.

Access to Services

5.19 The respondents were asked if they had access to the following services: GP/health centre; health visitor; maternity care; A&E; dentist; education or local school services; training services; careers advice; and access to work services. Respondents could state if the service was not relevant to them. The majority of respondents stated that they had sufficient access to all of these services where relevant. However, a small number of people did not feel they had sufficient access to schools

and maternity care. Furthermore, three respondents indicated that they experienced barriers to accessing services. When asked to elaborate, they made reference to difficulties relating to being moved on from encampments. As these respondents explained:

"Being moved on all the time, sometimes I have to cancel appointments and we can't get children into school because of this. We need somewhere to settle down"

"Sometimes when I have an appointment at the dentist or doctors I can't go and have to cancel it because the Police have made us move again".

5.20 Consultation with a local health service representative reiterated the access problems that can occur as a result of transience, particularly the issue of missed appointments and lower levels of engagement with mainstream services. Stakeholder consultation suggested current good practice around multi-agency working, particularly in relation to access to Early Years education and improving access to specialist health services (e.g. speech therapy).

6. Bricks and Mortar Accommodation

- 6.1 The precise number of Gypsies and Travellers currently accommodated within bricks and mortar accommodation within East Sussex is unknown. The Commission for Racial Equality's 2006 Report Common Ground: Equality, Good Race Relations and Sites for Gypsies and Irish Travellers suggested that the housed population could be around three times the number of trailer-based populations. Evidence from GTAAs elsewhere suggests there is movement between housing and sites. As such, the consideration of need within households living in bricks and mortar housing should form part of the consideration of strategic policies and working practices of local authorities. This chapter provides a discussion of Gypsies and Travellers in bricks and mortar accommodation across Brighton & Hove, drawing on information provided by the Council and other key stakeholders, and the survey with households living in bricks and mortar.
- 6.2 Brighton & Hove City Council provided the following information in relation to Gypsies and Travellers in bricks and mortar:
 - Gypsies and Travellers are referred to in the current Housing Strategy but this was in relation to site provision rather than bricks and mortar accommodation;
 - Gypsies and Travellers are also referred to in the current homelessness strategy although the number of homelessness applications from Gypsies and Travellers over the last 12 months was unknown;
 - The number of Gypsies and Travellers registered for social housing is unknown.
 Drawing on data from the Census 2011, the Council indicated that there were 88
 Gypsy and Traveller households across all tenure types, including 28 households in socially rented accommodation;
 - It was not known whether the number of Gypsies and Travellers moving into social housing had changed over the last five years. However, the Council felt that there may be an increase in Gypsies and Travellers moving into social housing over the next five years;
 - The Council indicated that, in their experience, Gypsies and Travellers moved into housing for the following reasons: wanting to 'settle'; wanting a permanent house; being unable to get a place on a site; being unable to find stopping places when travelling; and for children's schooling;
 - With regards to whether or not specific steps were taken to provide housing advice/assistance to Gypsies and Travellers, the Council stated that there "are no specific steps taken with regard to assistance for Gypsies and Travellers outside of what is provided to any applicant with difficulty accessing our system. In such cases we will work with whoever supports the applicant, so in this situation it may be the Traveller Liaison Team as opposed to a social worker or tenancy officer, for example"; and
 - Other than the 2011 Census data, there was no information in relation to Gypsies and Travellers living in private housing.

Estimating the Size of Gypsy and Traveller Population in Bricks and Mortar Accommodation

- 6.3 None of the stakeholders that were consulted, nor members of the local Gypsy and Traveller communities in the area, were able to accurately estimate the size of the Gypsy and Traveller population in bricks and mortar accommodation.
- 6.4 An interview with a representative from Friends, Families and Travellers (FFT) reported that they believed there was a significant need for pitches from people living in housing in Sussex and Brighton. This was largely due to perceived mental health issues arising from Gypsies and Travellers living in housing. However, at the same time, a representative of the local authority reported that most people living in housing appeared to be mostly content.
- 6.5 Accurately estimating the size of the population in housing is challenging. The 2011 Census indicates that there are 198 Gypsy/Traveller individuals within Brighton & Hove. The Census data reported by the local authority indicates that 88 of these are in housing in the area. It is worth noting that there was a finding from a national analysis of the 2011 Census that there were a higher proportion of households in bricks and mortar (42,453) than in caravans or other temporary structures (13,437). However, the ability of the Census to accurately enumerate the Gypsy and Traveller population has been questioned by some Gypsy and Traveller groups.²¹
- In the absence of accurate data or information, and as a pragmatic working assumption, the study team therefore believes it is reasonable to assume that the sample interviewed for this study constitutes around half of the total housed population. Based on a sample of 32 households living in bricks and mortar properties, our best estimate at this time is that the bricks and mortar population equates to **64 households**.
- 6.7 A more accurate estimation of the numbers of Gypsies and Travellers in houses will only be possible when a number of issues are resolved:
 - Gypsies and Travellers feel able to disclose their ethnic group in monitoring forms;
 - Monitoring forms allow for the ethnic groups as options; and
 - More data from the Census 2011 is released.
- 6.8 Until this point, estimates based on the informal knowledge of stakeholders and the experiences of fieldworkers, such as those in this study, will be the only and best source of evidence.

²¹ Irish Traveller Movement in Britain (2013) *Gypsy and Traveller Population in England and the 2011 Census*. London: Irish Traveller Movement in Britain. Available at:

http://irishtraveller.org.uk/wp-content/uploads/2013/08/Gypsy-and-Traveller-population-in-England-policy-report.pdf Accessed 07/03/2014.

Survey Findings: Bricks and Mortar Accommodation

- 6.9 A total of 32 people were interviewed in bricks and mortar accommodation across Brighton & Hove; none of these were living within the South Downs National Park. Of these respondents, 22 (69%) were living in socially rented accommodation; eight (25%) were owner occupiers; and two (6%) were living in private rented accommodation.
- 6.10 The respondents were from a range of Gypsy/Traveller groups: Romany Gypsy and Irish Traveller were most commonly referred to (44% and 31% respectively). The remaining respondents made reference to being New Travellers or Travellers (not specified). One respondent indicated that they were Romany Gypsy and their partner was a Travelling Showperson.
- 6.11 The respondents ranged in age from 25-74, with the majority aged 25-39. Household size ranged from one to six. There were 119 people across the 32 households; an average of 3.7 people per household. A total of 23 households (72%) indicated that they had children. Amongst the households there were 53 children; 2.3 children per household.

Views on Size and Facilities

- 6.12 19 respondents (59% of the sample) were living in three bedroom properties. 11 respondents (34%) were living in two bedroom properties, with the remaining two living in a one bedroom property. Six respondents reported that they did not have enough space in their current accommodation. This related to needing more bedrooms but also wanting a garden and outside space for parking or to have a trailer.
- 6.13 When asked how they rated their overall experience of living in bricks and mortar accommodation, 21 respondents (66%) indicated that it was good or very good, eight (25%) were ambivalent (i.e. neither good nor poor) and just one respondent described it as poor or very poor (two respondents did not provide a rating).

Accommodating Visitors at Home

6.14 Five respondents reported that they have visitors to stay with them on a short term basis. This was primarily immediate family although some also made reference to friends visiting. Of these respondents, two indicated that their visitors stayed in trailers when they visited rather than stopping in their house (one indicated that people stopped on the roadside while visiting them):

"Many of my friends come to Brighton many times in the year. They go on fields, car parks, parks, etc".

6.15 Five respondents indicated that hosting visitors was a problem. This related to having no room in their house to accommodate visitors.

6.16 Four respondents indicated that they sometimes go to stay with family/friends living or stopping in the local area. Two of these respondents indicated that they sometimes visit friends who are stopping on unauthorised encampments. As one respondent stated:

"Sometimes when my friends are in the Brighton area on the roadside, I do have three or four nights with them as I miss that way of life sometimes".

Reasons for Moving to Houses and for Staying in the Local Authority Area

6.17 Table 6.1 below shows the main reason for moving to their current home. As can be seen, the most common reason was a lack of sites (63%) followed by moving to be near family (19%) and health reasons (13%):

Table 6.1: Main Reason for Moving to the House

Reason	No	%
Lack of sites	20	63
To be near family	6	19
Own/family member health	4	13
Overcrowded previous accommodation	1	3
Work available in the area	1	3
Total	32	100

6.18 When asked why they stayed in Brighton & Hove, the majority of respondents stated that it was because they were born/raised in that area (53%) or had family living in the area (34%). The remaining respondents made reference to availability or work and friends in the area.

Length of Time in the Area and in their Current House

- 6.19 26 respondents of the 32 respondents (81%) had lived in Brighton & Hove for ten years or more, with the remaining respondents living in the area between one and 10 years. 26 respondents (81%) stated that they were permanent residents in Brighton & Hove (the remaining three respondents did not know or did not provide a response).
- 6.20 With regards to length of time in their current house, 24 respondents (60%) had lived there for five years or more, with the remaining respondents living there between one and five years. None of the respondents indicated that they had a base elsewhere.

Previous Accommodation Experiences

6.21 Table 6.2 below shows the type of accommodation people had before moving to their current house. As can be seen, the majority of respondents (63%) had previously been stopping on unauthorised encampments. Following unauthorised encampments, respondents had primarily moved from other site-based accommodation (e.g. Council, private, transit, field, etc.). The majority of respondents

indicated that this previous accommodation had been within the Brighton & Hove area:

Table 6.2: Previous Accommodation

Accommodation type	No	%
Unauthorised encampment	20	63
Private site	2	6
Residential Council site	2	6
Another house	1	3
Transit site	4	13
Friend's field	1	3
Women's refuge	1	3
Been here all my adult life	1	3
Total	32	100

Travelling Experiences

- 6.22 A total of 14 respondents (44%) still had a caravan; all of these respondents had a single caravan with the exception of one respondent who had two. With regards to travelling experiences, 18 respondents (56%) indicated that they did not travel. These respondents had not travelled in the last two to 20 years. This was primarily due to their own or a family member's health, children's education or work commitments. With regards to children's education, stakeholder consultation suggested that in cases where parents are illiterate, they often want to ensure that their children are able to access education. With regards to the remaining respondents, 13 stated that they travelled a few times a year (one did not provide any information) and all of these had travelled in the last 12 months. When asked where they tended to go, the respondents made reference to a range of places, including Appleby, Kenilworth and Stow fairs, Kent, Dorset, Devon, Cambridgeshire, Somerset, Wales and Wiltshire. With the exception of Appleby Fair, and one respondent who travelled to Wales, people primarily remained in Southern England.
- 6.23 With regards to where peopled stayed while travelling, people made reference to using the following accommodation (in order of frequency): designated fair sites; roadside; staying with friends/relatives on private and council sites; caravan parks; and farmers' fields.

Needs Relating to Work

6.24 The households were primarily self-employed. However, a number of respondents also indicated they, or someone within their household, were employed by someone else (this was more likely than with the respondents on the site based accommodation). One respondent indicated that they or someone within their household was unemployed and looking for work. Two households indicated that they or someone within their household were retired. One respondent indicated that they had current space needs relating to their work (however, they did not specify what these needs were).

6.25 With regards to where people worked, the majority of respondents worked within Brighton & Hove, with smaller numbers referring to working in Eastbourne, Hastings, Lewes, Rother and Wealden. Two respondents indicated that they worked outside the study area (working in Kent or "all over"). Twelve respondents indicated that they worked in areas that were within the South Downs National Park.

Access to Services

6.26 The respondents were asked if they had access to the following services: GP/health centre; health visitor; maternity care; A&E; dentist; education or local school services; training services; careers advice; and access to work services. Respondents could state if the service was not relevant to them. The majority of respondents stated that they had sufficient access to all of these services, where relevant, with the exception of a small number of people who felt they did not have sufficient access to employment, training or careers advice services. None of the respondents indicated that someone within their household was in further or higher education. However, none of the respondents indicated that they had difficulty accessing such services.

7. Travelling Showpeople

- 7.1 Planning policy relating to Travelling Showpeople was set out in Circular 04/07 and required that the accommodation needs of Travelling Showpeople to be included in the assessment of Gypsy and Traveller accommodation needs. This was superseded by the NPPF and *Planning Policy for Traveller Sites* (2012). Within the new planning policy statement it is clear that the accommodation needs of Travelling Showpeople should be included within the assessments of accommodation need for 'Travellers'. Table 2.1 in Chapter 2 outlines current local policy in relation to Travelling Showpeople.
- 7.2 Information provided by Brighton & Hove Council indicated that there are no sites for Travelling Showpeople within the area. No planning applications had been received from Travelling Showpeople over the last five years. The Council stated that they had not experienced any unauthorised development of Travelling Showpeople sites and therefore had not taken enforcement action in relation to Travelling Showpeople sites. They did not expect there to be an increase in sites for Travelling Showpeople over the next five years.
- 7.3 Consultation with the Showmen's Guild of Great Britain indicated that they were not aware of any accommodation need in the study area. They stated that they have no members on their list in Sussex (East or West) and that their members do not tend to go as far south for accommodation. It was suggested that although they may travel into the study area for work, they tend to live further in-land. The Guild indicated that the two counties with most need in the South East are Essex and Kent. Consultation with Brighton & Hove City Council also indicated that Travelling Showpeople worked, rather than lived, in the area.
- 7.4 The lack of Travelling Showpeople in the study area, and the information provided by the Showmen's Guild, appears to imply that there is a nil need for additional yard-based accommodation for Travelling Showpeople households. However, it should be noted that Travelling Showpeople remain distinct from Gypsies and Travellers and further work may need to be produced, across local authority boundaries, to accurately understand their accommodation needs in this wider vicinity.

8. Transit Accommodation

- 8.1 Although to a certain extent nomadism and travelling are currently restricted by a lack of sites nationally, this remains an important feature of Gypsy and Traveller identity and way of life, even if only to visit fairs or family. Some Gypsies and Travellers are still highly mobile without a permanent base, and others travel for significant parts of the year from a winter base. More Gypsies and Travellers might travel if it were possible to find places to stop without the threat of constant eviction. This chapter provides a discussion on Gypsies and Travellers on transit sites, drawing on information provided by the Council and other key stakeholders, and the survey with households stopping on transit provision in the study area.
- 8.2 There was one transit site in the study area at the time of the assessment (Horsdean Traveller Site). This site is owned by Brighton & Hove City Council and managed by the Traveller Liaison Team at the Council. The site is located within the South Downs National Park. Box 8.1 below provides further details about this site:

Box 8.1: Horsdean Traveller Site

This site provides transit accommodation on 23 pitches. However, at the time of the assessment only 10 pitches were in use due to drainage issues on the site. Information provided by the Council suggested that the pitches were likely to be brought back into use within the next 6 to 12 months.

Stakeholder consultation suggested that the site had originally been a piece of land that was used by New Travellers who had been tolerated. In the late 1990s a decision was made to look at the land and develop transit provision through the Gypsy and Traveller Site Grants. The site has received two grants over the last 10 years. These had been used for the following: to supply mains electricity to the site, including the building of an electrical substation; to provide water and electricity posts to each pitch; and to provide concrete hard standing and roadway. There is also a site office on the site.

With regards to management arrangements, the Council provided the following information:

"A non-resident warden post for the site was created in summer 2012. This arrangement stayed in place until December 2012 when a large number of Traveller households trespassed on the site, following which we have employed 24 hour security on the site. We are restructuring the Traveller Liaison Team in the near future and propose to have two Site Support Officers to share admin and warden duties. This is planned for early on in the next financial year".

There is a formal allocation policy for the site. The Council indicated that the following factors are taken into consideration when allocating pitches: need for accommodation; medical/special health needs; family or personal compatibility; previous known behaviour/references; and previous rent arrears. Of these factors, the three most important factors were (in order of importance): (1) previous known

behaviour/references; (2) previous rent arrears; and (3) medical/special health needs.

With regards to duration of pitch allocation, the allocation policy states the following:

"Pitches will be available for occupation for fixed term periods of up to 12 weeks. Applicants will initially be granted a 7 day license agreement. Provided there is no breach of the terms and conditions of the license agreement or of the site rules and provided no rent arrears have accrued the license will be renewed for a further 7 days. This will be repeated for up to I2 weeks and after this time the household will be required to leave the site. A license will not normally be granted to return to the site and occupy a pitch within the next three months".

However, the policy states that extensions may be granted in "exceptional circumstances" (i.e. relating to serious medical or welfare needs).

The weekly rent is £60 (inclusive of a £20 utility charge). A deposit is not required. The Council suggested that around 40% to 60% of people receive housing benefit towards this fee, although they stated that this could vary hugely.

The Council indicated that the Gypsy and Traveller groups that visited the site were mainly English Gypsy or Travellers (Romany) and Irish Travellers. The Council reported 50% to 75% occupancy for the previous 12 months (that is, for 2013). Stakeholder consultation suggested that people using the transit site often wanted to stay permanently, with there being a relatively steady population using the site.

The Council described the quality of the general surroundings and environment of the site - and the physical condition and its maintenance - as good. The site's location in terms of access to schools and shops was described as very good. It was indicated that there had been instances of intimidation and other anti-social behaviour on the site over the last year. The following incidents were referred to:

"Large incursion of Travellers in Christmas 2012; threatening behaviour to staff; resolved by obtaining court order and evicting. Subsequently employed 24 hour security staff and then closed site to change entrance. Further trespass by several households in Nov 2013 – intimidated staff to let them on, [resulted in] S61 eviction".

At the time of the assessment, there were plans to build a permanent residential Gypsy and Traveller site on land adjoining the existing transit site (see Chapter 4 for further details). The Council indicated that this would result in the loss of two transit pitches. The transit site would also need to be closed for the duration of the development of the permanent site.

Survey Findings: Transit Accommodation

8.3 Five people were interviewed on Horsdean Traveller Site over the study period. Four respondents indicated that they were Romany Gypsies and one Irish Traveller. The respondents were aged 17-24 (two respondents), 25-39 (two respondents) and 40-49 (one respondent). Household size ranged from one to five. There were 16 people across the five households; an average of 3.2 people per household. Four of the households indicated that they had children. Amongst the households there were seven children; 1.8 children per household.

Views on Size and Facilities

8.4 The respondents indicated that they had a single caravan. The average number of caravans to households was 1:1. Two respondents reported that they did not have enough space. When asked to elaborate, one indicated that they needed a larger pitch and one needed a larger caravan.

Reasons for Stopping on the Site and in the Local Authority Area

- 8.5 When asked why they were stopping on their current site, two respondents stated that it was because of a lack of sites, two indicated that they were evicted from their previous accommodation, and one respondent stated that they had "nowhere else to qo".
- 8.6 When asked why they were in Brighton & Hove, two respondents stated that they were born/raised in the area and one had family in the area (the remaining respondents did not provide a reason). None of the respondents indicated that they ever go and stay with family living in the area.

Length of Time in the Area and on the Site

- 8.7 When asked how long they had been in Brighton & Hove, four respondents indicated that they had been there for 10 years or more. The remaining respondent had been in the area between six and 12 months. Three respondents stated that they were permanent residents in the area. With regards to the two remaining respondents, one did not know if they were permanent or visiting and one did not provide any further information.
- 8.8 With regards to length of time on the transit site, two respondents had been there less than a week, two had been there between one and three months and one had been there two to four weeks. None of the respondents indicated that they had a base elsewhere.

Previous Accommodation Experiences

8.9 With regards to the type of accommodation respondents had before the transit site, three respondents indicated they had been stopping on unauthorised encampments (two in Brighton, one in Lewes) and two stated that they had come from a holiday/camp site in Brighton.

8.10 Two respondents reported having lived in a house at some point during their life: both had lived in socially rented housing, one in Brighton and one in Kent. They indicated that they had moved there with their family. One rated the experience as very poor, while the other did not provide a rating. The negative rating related to not being able to see their friends while they were living in a house.

Travelling Experiences

- 8.11 With regards to travelling experiences, four respondents indicated that they travel or move every week, while one respondent stated that they never travel. They indicated that they had recently left their previous site (a socially rented site in London), prior to which they had not travelled for over 15 years. Four respondents had travelled in the last 12 months (the remaining respondent did not provide any information. When asked where they tended to go, respondents stated that they tended to travel around the Brighton & Hove area as well as travelling beyond (Stow fair and Sussex, for example).
- 8.12 With regards to where peopled stayed while travelling, respondents made reference to staying at the roadside, caravan parks, with family/friends on private/council sites, staying on transit sites, farmers' fields and designated fair sites.

Site Needs Relating to Work

8.13 The households were self-employed, with the exception of one who indicated that they were currently not working and not looking for work. None of the respondents indicated that they had current or future site needs relating to their work. With regards to where people worked, two respondents were working within Brighton & Hove and Lewes, and two indicated that they were working within the whole East Sussex area. One respondent indicated that they also worked outside the study area (London). All four working respondents indicated that they sometimes worked in areas that were within the South Downs National Park.

Access to Services

8.14 The respondents were asked if they had access to the following services: GP/health centre; health visitor; maternity care; A&E; dentist; education or local school services; training services; careers advice; and access to work services. Respondents could state if the service was not relevant to them. The majority of respondents stated that they had sufficient access to all of these services where relevant. However, two respondents felt that they did not have sufficient access to employment, training or careers advice services, and one felt they did not have sufficient access to a dentist. Two respondents indicated that they had difficulty accessing services. They made the following comments:

"No address, so I use my mother-in-laws address. She has a house in Brighton"

"Sometimes I have to cancel appointments because we are being moved all the time, and there is no point putting the children in school for a few days at a time. We need somewhere to stay permanently". 8.15 As highlighted previously in Chapter 5, stakeholder consultation reiterated the access problems that can occur as a result of transience, particularly the issue of missed appointments and lower levels of engagement with mainstream services. There was a range of current good practice around multi-agency working, particularly in relation to access to Early Years education and improving access to specialist health services (for example, speech therapy). However, it was suggested that in order to improve health promotion, the transit site would benefit from having a health education room. This would enable specialist health services to visit the site and provide information but also provide specific health services (for example, child immunisation, dentistry and physiotherapy).

9. Future Accommodation, Household Formation and Accommodation Affordability

9.1 This chapter looks at a range of issues including the movement intentions of the sample, the formation of new households and concealment of existing ones and the accommodation intentions of the Gypsy and Traveller population. These factors are key drivers in the assessment of accommodation need within Brighton & Hove. The findings from the survey are presented here and how this then translates into 'need' is discussed in Chapter 10.

Movement Needs

9.2 Table 9.1 below shows the movement needs of the respondents interviewed in Brighton & Hove. As can be seen, just over half of the respondents (55%) indicated that they had no plans to move or were going to stay in their current accommodation indefinitely:

Table 9.1: Movement Needs in Brighton & Hove

	All		Unauthorised encampments				Transit site	
	No	%	No	%	No	%	No	%
Need to move immediately	1	2	1	8	-	-	-	-
Need to move in next three months (transit site requirement)	4	8	-	-	1	-	4	80
Need to move in next 12 months	4	8	1	8	3	9	-	-
Need to move in next one to two years	1	2	-	-	1	3	-	1
Going to stay indefinitely	4	8	-	-	4	13	-	-
I have no plans to move	23	47	1	8	22	69	-	1
Don't know	3	6	-	-	2	6	1	20
Stay as long as we can/until we have to move	9	18	9	75	-	-	-	-
Total	49	100	12	100	32	100	5	100

Note: excludes two missing cases

9.3 One respondent indicated that they needed to move immediately. This respondent was currently on an unauthorised encampment. They stated that they had been in the Brighton & Hove area for over 10 years. Prior to their current encampment, they had stopped on the transit site in Brighton and also another unauthorised encampment. They indicated that they needed to move as they "will be moved on". They wanted to stay in this area as they were born/raised here, and that they needed socially rented site based accommodation. They were aware that a site was going to be built in the area and wanted a pitch on that site. They indicated that no waiting list was available for the site yet.

9.4 Four respondents indicated that they needed to move in the next three months.

These respondents were all staying on the transit site at Horsdean and indicated that three months was the maximum allowed time on the site. The following provides information about these households:

HH1: They had been in Brighton & Hove for 10 years or more. They stated that they had moved to Horsdean due to a lack of sites. Prior to the transit site they had been stopping on unauthorised encampments around Brighton but also one in Lewes. They indicated that they intended stopping in this area as they were born/raised here, and stated that they needed socially rented site based accommodation. They suggested that this would be within the South Downs National Park area. When asked to indicate their preferred ways of living they stated, in order of preference, site (owner occupied), site (socially rented) or roadside.

HH2: They had been in Brighton & Hove for 10 years or more. They stated that they had moved onto the site as they were evicted from their previous accommodation. They had been staying on a caravan park in Brighton and stated that they were evicted "when they found out we were Travellers". They stated that they intended stopping in this area because they have family in the area and that they needed accommodation on a socially rented site. They did not know if this would be within the South Downs National Park area. When asked to indicate their preferred ways of living they stated, in order of preference, site (owner occupied), site (socially rented) or caravan/chalet park.

HH3: They had been in Brighton & Hove for 10 years or more. They stated that they had moved onto the site as they had "nowhere else to go". Prior to the transit site they had been stopping on unauthorised encampments around Brighton. They intended stopping in this area because they were born/raised here and have family in the area, and stated that they needed accommodation on a socially rented site or "anywhere they will allow me to stay". They indicated that they wanted to put their name on the list to live on the new site that was being proposed in Brighton (which is within the South Downs National Park area). When asked to indicate their preferred ways of living they stated, in order of preference, site (owner occupied), bricks and mortar (owner occupation) or site (socially rented).

HH4: They had been in Brighton & Hove for 10 years or more. They stated that they had moved onto Horsdean due to a lack of sites. Prior to the transit site they had been stopping on a "camp site" in Enfield: however, they stated that they had also previously lived on a socially rented site in Kent. They intended stopping in this area because of family in the area and stated that they needed to move onto a pitch on a preferred site. They declared a need for socially rented site based accommodation within the South Downs National Park area. When asked to indicate their preferred ways of living they stated, in order of preference, site (owner occupied), site (socially rented) or bricks and mortar (owner occupation).

9.5 Four respondents indicated that they needed to move in the next 12 months. The following provides information about these households:

HH1: New Traveller currently living in a socially rented house. They indicated that they had lived in Brighton & Hove for between five and 10 years, and in the house for between one and three years. Prior to the house they had been stopping on unauthorised encampments but had moved into a house when their partner was having another baby. They indicated that their partner is "always bad in childbirth" and that they tend to move into a house but then return to travelling once she is better. They indicated that they intended stopping in this area. They stated that they needed a roadside/informal stopping place. They were not sure if this would be within the South Downs National Park area. When asked to indicate their preferred ways of living, they stated site based accommodation, whether owner occupied, roadside or official short stay sites.

HH2: Currently living in a socially rented flat. They indicated that they had been in the Brighton & Hove area on and off for most of their life, and in the flat for between one and three years. They moved into the flat because it was available. They indicated that they needed to move due to overcrowded conditions in the flat. They intended staying in the area due to family living there and expressed a preference for another house. They were currently on the waiting list for a house.

HH3: Currently stopping on an unauthorised encampment. They indicated that they had been in the Brighton & Hove area between six and 12 months staying on unauthorised encampments. They stated that it was their first time in this area and they had come to visit family. They claimed that their parents own a site in Bedfordshire which they use as a base. They stated that they would be returning to that base once they had finished visiting family.

HH4: Currently living in a socially rented flat. They indicated that they had been in the Brighton & Hove area for 10 years or more, and in the house for between one and three years. Prior to the house they had been stopping on unauthorised encampments "all over Brighton". They had moved into a house due to a lack of sites. They indicated that they needed to move to a preferred area of Brighton due to children's schooling. They indicated that they were currently "trying to get a house exchange" but, also, that "if they make a permanent site, I would put my name down, as long as it was in Brighton". When asked to indicate their preferred ways of living they stated site based accommodation (either socially rented or owner occupied) or bricks and mortar (owner occupied).

- 9.6 One respondent indicated that they needed to move in the next one to two years. They were currently living in a socially rented house. They indicated that they had been in the Brighton & Hove area for 10 years or more, and in the house for between one and three years. Prior to the house they had been stopping on a friend's field in Lewes. They had moved into a house due to a lack of sites. They indicated that they needed to leave the house as the move into bricks and mortar had impacted on their partner's mental health. They indicated that they needed site based accommodation and were looking to rent a pitch on a private site. They did not intend staying in Brighton: they needed to move to Wealden as their partner was raised in that area but also due to the availability of work in that area and for children's schooling. They were not aware of any accommodation available for them to move to or whether or not their accommodation would be within the South Downs National Park area. When asked to indicate their preferred ways of living they stated site based accommodation, private rented, owner occupied or roadside (this respondent has been excluded from this study and included in the calculation of residential need for Wealden in the assessment that was carried out for East Sussex).
- 9.7 Three respondents indicated that they needed to move, but did not know when it would happen. All three respondents intended on moving to bricks and mortar accommodation (two of these already lived in a house but wanted to move to another house; one was stopping on the transit site). All three intended to stay in Brighton & Hove and indicated that they were currently on the waiting list for a house.
- 9.8 Nine respondents, on unauthorised encampments, indicated that they would stay as long as they could/until they were moved on. Six of these respondents were all stopping together on the same encampment. All six claimed to have been in Brighton & Hove for 10 years or more. Prior to this encampment they had all been stopping on other encampments in Brighton. They all intended stopping in this area due to being born/raised here and/or having family in the area. All six stated that they needed socially rented site based accommodation and that they wanted to live on the new site that was being proposed in Brighton (which is within the South Downs National Park area). They suggested that Brighton & Hove City Council were already aware of their need to move onto the proposed new site.
- 9.9 With regards to the remaining three respondents, one indicated that they had been in the area for less than six months, stating that it was their first time in the area. Prior to their current encampment, they had been stopping on a transit site in Surrey. They intended to stop in the area as there was work available and needed roadside/informal stopping place. The remaining two respondents were stopping on an encampment that was within the South Downs National Park area. The following provides information about these two households:

HH1: They had been in the Brighton & Hove area on and off between five and 10 years primarily staying on unauthorised encampments. However, they had also stayed in Lewes and Hastings this year and had moved to this encampment from an encampment in Lewes. They did not know if they would stay in this area and were moving as they wanted to travel and indicated that they "travel most of the time to different roadsides".

HH2: They had been in the Brighton & Hove area 10 years or more. They indicated that they primarily stayed on unauthorised encampments around Brighton and Lewes, although they had recently moved from the transit site in Brighton to their current encampment. They indicated that they needed to stay in the area and needed their own site with planning permission. They did not provide any information as to why they needed to stay in Brighton & Hove or whether they needed to be accommodated within the South Downs National Park area. They also stated that they were aware that a socially rented site was going to be developed in the area (still, they did not specify that they wanted to move onto it either).

Household Concealment

9.10 None of the respondents indicated that there was anyone within their household in immediate need of their own accommodation.

Household Formation

9.11 Three respondents indicated that there was someone within their household in need of their own accommodation over the next five years. The following provides information about these households:

HH1: Currently stopping on an unauthorised encampment. This was one of the six households referred to in Paragraph 9.8 above who were hoping to be accommodated on the proposed socially rented site in Brighton. They indicated that their son would be 16 in five years. They hoped that, should they be able to secure a place on the site, their son would be able to be accommodated with them on the site when he required his own separate accommodation.

HH2: Currently stopping on an unauthorised encampment. Again, this was one of the six households referred to in Paragraph 9.8 above who were hoping to be accommodated on the proposed socially rented site in Brighton. They indicated that their son would be 16 this year. They indicated that he would stay with them until he was 18 and then it would be "up to him". However, they stated he would need to be accommodated on a socially rented pitch.

HH3: Currently living in a socially rented house. They indicated that they had twin boys aged 15. They were not sure where their sons would need to be accommodated, although they stated "with us". This household had no plans to move from their current accommodation but they did state a preference for fields or land that they could move onto when they wanted to.

9.12 Across the sample in Brighton & Hove there were 37 children aged 11-16 at the time of the study. As highlighted above, only three households expressed an immediate or future need for children becoming adults and therefore needing to move out of the family home. This is most likely due to respondents simply not knowing if and when their teenage children will marry, and subsequently need their own separate

accommodation in the next five years. However, these young people will be aged 16-21 in five years' time. It is likely that a proportion of these 37 children will need their own independent accommodation, and a proportion of these will choose to remain within Brighton & Hove.

Accommodation Affordability

9.13 In order to explore issues of accommodation affordability we asked respondents if they could afford to purchase a pitch on a private site with planning permission and land with planning permission to be developed into a site. None of the respondents indicated that they could afford to purchase either a pitch or land. Two respondents both living in bricks and mortar accommodation - claimed that they already owned a piece of land but did not provide any further details on where this land is or what it is used for. The remaining respondents said it was not relevant to them.

10. An Assessment of Accommodation Need

10.1 Irrespective of change in planning policy targeted at resolving Gypsy and Traveller accommodation issues, there are no signs that the growth in the Gypsy and Traveller population will slow significantly. Research from the Equalities and Human Rights Commission (EHRC) states that around 6,000 additional pitches for Gypsies and Travellers are immediately required nationally to meet the current shortage of accommodation within England.²²

A Note on the Assessment of Accommodation Need

- 10.2 Despite all local authorities across England completing a first round of Gypsy and Traveller Accommodation Needs Assessments (GTAAs) over the 2006-2009 period, the methods of assessing and calculating the accommodation needs of Gypsies and Travellers are still developing. The model drawn upon here is derived from a number of sources including:
 - The Guidance on Gypsy and Traveller Accommodation Assessments;²³
 - Guidance and experience of benchmarking the robustness of GTAAs;²⁴ and
 - The Planning Policy Statement *Planning Policy for Traveller Sites* which was released in March 2012.
- 10.3 This assessment draws upon empirical primary research within Brighton & Hove as opposed to developing projections based upon trends within the Caravan Count. Through collecting primary and secondary data, official records are brought together with a comprehensive survey of households to develop a robust assessment of need.
- 10.4 This study has taken a thorough assessment of the pitch need arising from all accommodation types present at the time of the survey. As such, it should be regarded as a reasonable and robust assessment of need upon which to inform the development of planning policy and future planning decisions. The assessment provides figures for both the Brighton & Hove Local Planning Authority area and the South Downs National Park Planning Authority area within Brighton and Hove. This disaggregation of need is required for plan making purposes. The detailed description of the methodology below provides information on how the need has been apportioned between the two planning authorities.

²² See Brown, P., Henning, S. and Niner, P (2010) Assessing Local Housing Authorities' Progress in Meeting the Accommodation Needs of Gypsy and Traveller Communities in England and Wales: Update 2010, London: Equality and Human Rights Commission.

²³ DCLG (2007) *Gypsy and Traveller Accommodation Assessments: Guidance*, London: HMSO.

²⁴ CURS, SHUSU and CRESR (2007) *Preparing Regional Spatial Strategy Reviews on Gypsies and Travellers by Regional Planning Bodies*, London: DCLG, available at:

http://webarchive.nationalarchives.gov.uk/+/http://www.communities.gov.uk/pub/209/PreparingRegionalSpatialStrategyreviewsonGypsiesandTravellersbyregionalplannings_id1508209.pdf

10.5 Accommodation need has been considered in this assessment by carefully exploring the following factors:

Current Residential Supply

- · Socially rented pitches; and
- Private authorised pitches.

Residential Need 2013/14 - 2017/18

- Temporary planning permissions, which will end over the assessment period;
- Concealment of households;
- Allowance for family growth over the assessment period;
- Need for authorised pitches from families on unauthorised developments;
- Movement over the assessment period between sites and housing and vice versa;
- Whether the closure of any existing sites is planned;
- Potential need for residential pitches in the area from families on unauthorised encampments and transit sites;
- Movement between areas; and
- Overcrowding of sites.

Additional Supply 2013/14 - 2017/18

10.6 The requirements are presented in summary form in Table 10.1 below. This table details the overall accommodation and pitch needs, over the next 15 years, for Gypsies and Travellers resident in Brighton & Hove based on the definition in the Housing Act. Each element is explained in greater detail below. All figures relate to pitches not sites. As highlighted above, two figures are provided: one for Brighton & Hove and one identifying pitch requirements that fall within the South Downs National Park area of Brighton & Hove. Please note that while some pitch requirements are allocated to the South Downs National Park planning authority, Brighton & Hove City Council's Traveller Liaison Team are responsible for working with the households and managing site provision within both local planning authority areas.

Permanent Residential Accommodation Need over 2018/19-2022/23 and 2023/24-2027/28

10.7 The current shortage of sites and pitches for Gypsies and Travellers means that it is difficult to predict trends in living arrangements until the current lack of pitch-based accommodation has been addressed at a national level. There is no means of knowing how Gypsies and Travellers will decide to live in the next decade.

- 10.8 There are complex factors involved underpinning the determination of the proportion of households who will form in the future. In order to tackle the complexity of issues that may well occur over the next decade, it is established practice in assessment of Gypsy and Traveller accommodation needs to apply an assumed rate of household growth. As applied in similar studies, a standard 3% per annum compound rate of household growth is used. This figure is then applied, to the projected number of pitches which should be available by 2017, minus an assumed ratio of 1:0.75 used to account for any potential pitch sharing. 25 All household growth is assumed to require site-based accommodation.
- 10.9 The supply of pitches over the 2018/19 - 2027/28 period has been considered but has been assumed to be zero. This assumption is consistent with more recent GTAAs. As highlighted in the explanation for Row 13 below, supply factors are extremely difficult to predict.

²⁵ A pitch sharing rate of 1:0.75 was recommended for use in the South East Examination in Public Panel Report.

Table 10.1: Summary of Gypsy and Traveller Accommodation and Residential/Permanent Pitch Need (2013/14 - 2027/28)

		Brighton & Hove LPA area	SDNP LPA area of Brighton & Hove
	Element of supply and need	Accommodation Need/Supply Total (households)	Accommodation Need/Supply Total (households)
	Current residential supply		
1	Socially rented pitches	0	0
2	Private authorised pitches	0	0
3	Total authorised Gypsy and Traveller pitches	0	0
	Posidoratiol witch wood 2012/14 2017/10		
	Residential pitch need 2013/14 –2017/18		
4	End of temporary planning permissions	0	0
5	Concealed households	0	0
6	New household formation	0	2
7	Unauthorised developments	0	0
8	Net movement from housing to sites	0	2
9	Closure of sites	0	0
10	Transit households/unauthorised encampments ²⁶	15	16
11	Movement between areas	0	0
12	Residential pitch need (2013/14 –2017/18)	15	20
13	Supply (2013/14 – 2017/18)	0	12
14	Residential pitch need (2013/14 – 2017/18)	15	8
15	Residential pitch need (2018/19 – 2022/23)	2	2
16	Residential pitch need (2023/24 – 2027/28)	2	3
17	Total Residential pitch need (2013/14 – 2027/28)	19	13

Note: For pragmatic reasons these figures have been rounded to the nearest whole pitch

Explanation of the Need Requirement Elements

Current Residential Supply

Row 1: The number of pitches on residential socially rented sites provided by local authority information.

Row 2: The number of pitches on residential private authorised sites provided by local authority information.

²⁶ This figure includes need arising from unauthorised encampments *and* need arising from households on the Horsdean transit site. For Brighton & Hove LPA, 15 pitches were required from unauthorised encampments. For the SDNP LPA area, the figure of 16 includes 12 pitches required from unauthorised encampments and four pitches required from households on the Horsdean transit site (see explanation of need requirements for Row 10).

Row 3: The total number of residential authorised pitches within Brighton & Hove and the South Downs National Park.

Residential Pitch Need 2013/14 - 2017/18

Row 4: The number of pitches which have temporary planning permission due to expire within the assessment period.

Row 5: This details the number of concealed households occupying existing accommodation who require independent accommodation within Brighton & Hove and the South Downs National Park.

Row 6: This is the number of pitches required from new household formation:

Pitch Requirements from New Households Forming

Findings:

- Within the survey of households, across all accommodation types, two
 respondents reported having independent households living with them which
 were in need of their own separate accommodation/pitch over the next five
 years;
- At the time of the assessment both respondents were stopping on an unauthorised encampment in Brighton and indicated that they needed to be accommodated on the new socially rented residential site that was proposed for Brighton & Hove;
- With regards to the separate requirements forming from within these households, both referred to having one teenage son who would require separate accommodation; and
- A third respondent indicated that they had twin boys who would require their own accommodation in the future; however, they did not specify the particular form that this accommodation would take. They were currently living in a house and had no plans to move.

Assumptions:

- Survey findings are reflective of the needs within the area;
- It is reasonable to assume that these new households will need to be accommodated on the same site as their parents (see Chapter 9, Paragraph 9.11); and
- It is not possible to gross these findings up to a baseline population due to the uncertainty of the total population on unauthorised encampments

Calculation: Need for pitches from new households forming = **2 households**. These figures feature within the need identified for the South Downs National Park as the proposed socially rented site is within that planning authority area.

Row 7: This is the level of need arising from current unauthorised developments.

Row 8: This is the estimation of the flow from sites to houses and vice versa:

Movement between Housing and Sites

Movement from sites to housing: one respondent indicated that they wanted to move from the transit site to a house. Given that they were on transit accommodation, this household is not relevant to residential need calculations.

Movement from housing to sites: one respondent (3% of the bricks and mortar sample) needed to move from bricks and mortar in the next 12 months. Although they were currently waiting for another house, they stated that if a permanent site was developed in Brighton & Hove, they would want to go on the waiting list. They had moved into bricks and mortar due to a lack of sites (see Chapter 9, Paragraph 9.5, HH4). A second respondent indicated a need to move from their current house, however, they were looking for roadside/informal stopping places so do not feature in the calculation of permanent residential need (see Chapter 9, Paragraph 9.5, HH1).

Calculation: 3% of the bricks and mortar sample (32), grossed to the estimated population in bricks and mortar accommodation (64) = **2 households**. These figures feature within the need identified for the South Downs National Park as the proposed socially rented site is within that planning authority area.

Row 9: Plans to close existing sites, which have been calculated within the supply of site accommodation, will ultimately displace a number of Gypsies and Travellers resulting in an increase in housing need. There are no sites that are due to close in Brighton & Hove.

Row 10: This provides an estimation of the need arising from households on unauthorised encampments **and** transit sites that require a residential pitch in the study area. The box below divides this element into those who are accommodated on unauthorised encampments and those who are currently accommodated on the transit site in the area:

Households Involved in Unauthorised Encampments

Findings:

- Information from Brighton & Hove City Council provides figures for unique or unidentified households for 2011 (91 households), 2012 (76 households) and 2013 (107 households). This is an average of **91 households**;
- The Council indicated that there may be some double counting as it is not possible to identify every household when site visits are carried out; and
- The survey of Gypsies and Travellers showed an average of 1 caravan per household. This is common amongst households on unauthorised encampments.

Assumptions:

- Assume that a number of these households occupy multiple encampments throughout the calendar year; and
- From conversations with stakeholders we assume this is the case in 25% of encampments. The number of vehicles/trailers should therefore be moderated down by 25% to account for these repeat encampments.

Calculation: 75% of 91 households = **68 households involved in unauthorised encampments**.

Need for Residential Pitches from Unauthorised Encampments

Finding: Of the 14 households interviewed on unauthorised encampments, eight (57%) were actively looking for a residential pitch in the study area. It must be noted that this is based on a relatively small sample size and therefore may not be reflective of the entire population who tend to feature as unauthorised encampments. Consultation with Brighton & Hove City Council suggests that 20% of the encampments they experience require residential accommodation. This is based on the joint assessment process that they carry out with encampments across the study area, which ascertains the reasons for being in the area (e.g. holiday, work, visiting relatives, for example).

Assumptions:

- A pragmatic approach to working with the two different figures provided that
 is, the local authority 20% and the Gypsy and Traveller survey figure of 57% is
 to take the middle point of these two figures. As such it is assumed that the
 need for residential pitches will be the equivalent to 39% of unauthorised
 encampments; and
- This is treated as a single year element rather than a 'flow' of new families each year. Other households on unauthorised encampments should be incorporated into other GTAAs.

Calculation: 39% of households involved in unauthorised encampments = 39% of 68 = **27** households/pitches.

Disaggregation between the two local planning authorities: as highlighted previously, this assessment is required to disaggregate findings between the Brighton & Hove Local Planning Authority area and the South Downs National Park Local Planning Authority area. In order to disaggregate the need arising from unauthorised encampments, Brighton & Hove City Council looked at the locations of their encampments over the last three years and identified 55% had occurred within the Brighton & Hove planning authority and 45% within the SDNP area of Brighton & Hove. The two planning authorities therefore agreed that need arising from unauthorised encampments should be disaggregated by using this 55/45 split. As such the need arising from encampments is 15 pitches for Brighton & Hove and 12 pitches for the SDNP.

Need for Residential Pitches from Transit Site Occupants

Findings: The transit site in Brighton & Hove has provision for 23 pitches, although only 10 were available due to draining issues on the site. Five households were interviewed on this site during the course of this study. Four of these households expressed a need for socially rented permanent residential accommodation in the study area (see Chapter 9, paragraph 9.4).

Assumptions:

- Because of the small sample it is impossible to gross these findings to all occupants of the transit site;
- Assume that need for residential pitches from occupants equates to the four households expressed this need; and
- This is treated as a single year element rather than a 'flow' of new families each year.

Calculation: Need for residential accommodation from households on the transit site = **four households**. These figures feature within the need identified for the South Downs National Park as the proposed socially rented site is within that planning authority area.

The combined need for permanent residential accommodation from unauthorised encampments and transit site occupants = **31 pitches (15 for Brighton & Hove and 16 for the South Downs National Park).**

Row 11: This is the level of movement of households between areas. The assessment found that one household - currently living in bricks and mortar accommodation - needed to move to site based accommodation in Wealden (see Chapter 9, Paragraph 9.6). This household has been included in the separate report which details the needs assessment carried out in East Sussex.

Row 12: This is the total gross residential need for pitches arising in Brighton & Hove and the South Downs National Park area within Brighton & Hove between 2013/14 and 2017/18.

Row 13: This includes the supply of pitches from all private and socially rented authorised sites. One site (for 12 pitches), which is located adjacent to the existing transit site, has received planning permission for development.²⁷ No other supply factors have been taken into account as they are extremely difficult to predict in terms of any permissions being granted in the future, and only this one site has been granted since 2006.

²⁷ Please note that the inclusion of these 12 pitches is contingent on the development proceeding as planned. Any alteration to this plan will impact on the supply figure and subsequently the overall requirement calculation.

Row 14: This is the total net requirement for pitches arising in Brighton & Hove and the South Downs National Park area within Brighton & Hove between 2013/14 and 2017/18.

Row 15: The total requirement for pitches in Brighton & Hove and the South Downs National Park area within Brighton & Hove over the period 2018/19 - 2022/23 (derived from the assumed growth calculation as highlighted in Paragraph 10.8 above).

Row 16: The total requirement for pitches in Brighton & Hove and the South Downs National Park area within Brighton & Hove over the period 2023/24 - 2027/28 (derived from the assumed growth calculation as highlighted in Paragraph 10.8 above).

Row 17: The total overall requirement for pitches in Brighton & Hove and the South Downs National Park area within Brighton & Hove over the period 2013/14 - 2027/28, minus the proposed supply of 12 pitches.

Summary

10.10 Analysis of data has shown that accommodation need will arise from the following factors: (1) new household formation; (2) movement from housing to sites; and (3) households currently occupying unauthorised encampments and transit site pitches. This analysis has shown that for the Brighton & Hove Planning Authority there is an accommodation need for 19 households/pitches over the 2013/14 - 2027/28 period with a need for 13 households/pitches for the South Downs National Park Authority over the 2013/14 - 2027/28 period. These figures incorporate a household growth rate of 3% per year compound, as applied to all current households in the area and all future households that should be accommodated on pitches by 2018 to estimate need in the period 2018/19 - 2027/28.

11. An Assessment of Transit Need

- 11.1 National policy is clear that there should be provision in order for Gypsies and Travellers who choose to travel to do so without resorting to stopping illegally or inappropriately.
- 11.2 Within the Brighton & Hove area, formal provision for short stay households is currently made available on the Horsdean Traveller Site in Brighton. This site accommodates a total of 23 pitches. At the time of fieldwork, six of these were occupied, four were vacant and 13 were closed. The site is managed by Brighton & Hove City Council but located within the South Downs National Park. The manager for the site reported that when the site is fully occupied it presents management challenges. Further details about this site, as well as responses from households who were residing on it, can be seen in Chapter 8.
- 11.3 Information provided by officers from within Brighton & Hove City Council, the South Downs National Park Authority and other stakeholders suggests that there is a continuing need for transit provision in the area. The formal transit site appears to have consistent use and unauthorised encampments appear regularly in the study area. The presence of unauthorised encampments indicates an unmet need for transit provision.

Assessing the Quantity of Transit Need Required in the Study Area

- 11.4 Quantifying the need arising for transit provision is often regarded as a particularly challenging element of producing GTAAs. A lack of definitive and comprehensive data hinders this process enormously. There are several elements which need to be considered when assessing need for transit provision, these are:
 - the levels of occupancy on existing transit provision;
 - the levels of unauthorised encampments in an area (often used as a direct proxy for understanding the level of need for short-stay accommodation);
 - the views of stakeholders working in the study area; and
 - the expressed needs of Gypsies and Travellers in response to the survey.
- 11.5 Each of these factors is discussed below:

Levels of Occupancy on Existing Transit Provision

At the time of writing, the Horsdean Traveller Site was experiencing exceptional circumstances due to the drainage issues on the site. Information from the local authority indicated that the site is rarely fully occupied. For example, over 2013, the site was seen to have between 50-75% occupancy at any one time. This allows for pitches to be available when they are required. However, the transit site is large, at 23 pitches, and it is not recommended that there are further extensions to this site as it is already seen as being challenging to manage when at, or near, capacity. As a result of the development of the planned residential site adjacent to the Horsdean

site, there will be a net loss of two pitches. The available transit pitches will then reduce to 21 pitches.

Levels of Unauthorised Encampments in an Area

The Caravan Count shows significant numbers of caravans recorded on unauthorised encampments over recent years (see Chapter Three). Brighton & Hove City Council provided data for unique or unidentified households on unauthorised encampments for 2011 (91 households), 2012 (76 households) and 2013 (107 households). This is an average of 91 households per year involved in unauthorised encampments. In order to arrive at these figures, the Council removed known instances of double counting - where the same family had occurred on more than one encampment - as well as removing known Van Dweller encampments from the data.

Views of Stakeholders Working in the Study Area

A number of stakeholders working within the Brighton & Hove area thought that there was a need for more transit provision. However, no stakeholder expressed the view that this should necessarily be in the form of an additional formal transit site. A representative of Friends, Families & Travellers (FFT) stated that if the needs of households currently residing on unauthorised encampments in the area were accommodated on suitable 'regularised' provision, and unmet residential need residing on transit provision is met, the Horsdean site may provide the capacity necessary to accommodate future short-stay requirements.

It was noted as a concern that households who were looking for short-stays in the area were being engineered out of particular places by barricades or by these places being re-developed. It was suggested that areas that are already experiencing significant levels of repeat encampments - such as parks, public areas and playing fields - may be used with increasing regularity in the future. The provision of alternative short-stay accommodation should be considered a priority.

Views of stakeholders suggested that there may be some movement of households between the Horsdean site and the transit site situated within Lewes. This may suggest a need for residential accommodation from certain households within the broader area. Or it may suggest a preference for stays of longer periods than is currently permitted by the conditions on the transit sites.

Expressed Needs of Gypsies and Travellers in Response to the Survey

Paragraph 9.4 highlights the expressed intentions of households residing on the Horsdean site at the time of the survey. All of the households interviewed as part of the survey, who were residing on the transit site, were looking for residential accommodation options in the near future (see Chapter 10). Furthermore, over half of the residents interviewed on unauthorised encampments were looking for residential accommodation in the area (see Chapters 5 and 9). The remainder were residing temporally in the area visiting family or for work reasons.

11.6 In order to offer quantification for the need for transit provision, the presence of unauthorised encampments is used as an indicative proxy. As such the methodology for calculating the need for transit provision is similar to that for calculating the need for residential provision from unauthorised encampments:

Households involved in Unauthorised Encampments

Findings:

- Information from Brighton & Hove City Council provides figures for unique or unidentified households for 2011, 2012 and 2013. These figures are as follows: 2011 91, 2012 76 and 2013 107. This is an average of 91 households;
- The Council indicated that there will be some double counting as it is not
 possible to identify every household when site visits are carried out; and
- The survey of Gypsies and Travellers showed an average of 1 caravan per household.

Assumptions:

- Assume that a number of these households occupy multiple encampments throughout the calendar year; and
- From conversations with stakeholders we assume this is the case in 25% of encampments. The number of vehicles/trailers should therefore be moderated down by 25% to account for these repeat encampments.

Calculation: 75% of 91 households = **68 households involved in unauthorised encampments**.

Need for Transit Provision

Finding: Of the 14 households interviewed on unauthorised encampments, eight (57%) were actively looking for a residential pitch in the study area. It must be noted that this is based on a relatively small sample size and therefore may not be reflective of the entire population who tend to feature as unauthorised encampments. Information from Brighton & Hove City Council suggests that 20% of the encampments they experience require residential accommodation. This is based on the joint assessment process that they carry out with encampments across the study area, which ascertains the reasons for being in the area. A pragmatic approach to working with the two different figures provided - that is, the local authority 20% and the Gypsy and Traveller survey figure of 57% - is to take the 'middle ground'. As such it is assumed that the need for residential pitches will be the equivalent to 39% of unauthorised encampments.

Assumptions:

- Assume that the need for residential pitches will be the equivalent to 39% of unauthorised encampments; and
- Assume that other households (61%) would need to be accommodated by transit provision.

Calculation: 61% of households involved in unauthorised encampments = 61% of 68 = **41** households/pitches.

- 11.7 This indicates that the study area can expect to see an estimated 41 households require short-stay accommodation during one calendar year.
- 11.8 By taking into account that the main travelling months are, generally speaking, between April-October, it seems reasonable to assume that the vast majority of this travelling will be done within this 6 month period. If a transit pitch has an upper time limit of stay of 12 weeks, this means that the 23 pitch transit site during the summer will have the capacity to cater for a minimum of around 46 households (assuming that these households leave the area and that each household resides for the full 12 weeks allowance). However, if households stayed on average for around 4 weeks the 23 pitch site would accommodate 138 households over the summer period. While the transit site currently has 23 pitches, the development of the proposed 12 residential pitches would decrease the capacity at Horsdean by two pitches (to 21 pitches) (see Chapter 4). If a transit pitch has an upper time limit of stay of 12 weeks this means that a 21 pitch transit site during the summer will have the capacity to cater for a minimum of around 42 households (assuming that these households leave the area and that each household resides for the full 12 weeks allowance). However, if households stayed on average for around 4 weeks a 21 pitch site would accommodate 126 households over the summer period.
- 11.9 These potential scenarios indicate that the current level of transit provision *should* be sufficient to meet the needs of households requiring short-stay accommodation in the study area. However, from exploring the data available and from consultations with stakeholders, it is apparent that the existing transit site is sometimes under-occupied, while encampments are still occurring in various locations across the City. There are therefore a number of issues for Brighton & Hove City Council and the South Down National Park authority to consider in relation to this transit provision:
 - The provision of a single transit site does not necessarily accommodate more than one encampment in the area at the same time, particularly if there are issues around mixing of different groups (family and ethnic);
 - The needs of the travelling groups often combines a mixture of motivations (i.e. work, family and holiday). A single transit site may not meet these differing requirements; and
 - While 23 (or 21) transit pitches appears sufficient to address transit need in the study area, there is a need to consider how to respond for any larger encampments that may occur (for example, data provided by the Council suggested that, on occasion there were encampments of up to 80 caravans).
- 11.10 Although transit need could be met by the creation of 'hard' purpose made pitches/sites, it is also recommended that the authorities balance the need for the development of such 'hard' pitches with the possibility of 'soft' transit pitches (that is, designated stopping places). Such 'softer' options would provide Gypsies and Travellers with somewhere authorised and more secure to stop whilst creating a minimal environmental impact. For example, one authority in the UK takes an approach of accommodating 'accepted encampments' in designated areas, where refuse collection and toilets are provided. While there are no formal licensing arrangements, residents are expected to follow a particular code of conduct while

stopping on the designated area. Such stopping places are often favoured by Gypsy and Traveller households. It is recommended that a range of sites are identified by both planning authorities that can accommodate different sizes of 'authorised encampments'.

12. Concluding Comments

- 12.1 At the time of the assessment, there was no residential provision within the study area. The existing provision consisted of a 23 pitch transit site. It was recognised by Brighton & Hove City Council and the South Down National Park Authority that there was a need to provide a permanent site in the area. This was primarily to address some of the need arising from long standing unauthorised encampments in the study area. Planning permission for a 12 pitch development to be used as a socially rented site adjacent to the existing transit site has been approved. Whilst this development is a positive step towards addressing accommodation need in the study area, this updated assessment has identified additional need beyond the 12 proposed pitches. More specifically, the study identifies a need to accommodate 32 households/pitches across the study area over the period up to 2028. The disaggregation of this need indicates that within Brighton & Hove LPA there will be a need for pitches for 19 households/pitches and within the South Downs National Park LPA area there will be a need for pitches for 13 households/pitches (as illustrated in Table 10.1).
- 12.2 Whilst this assessment disaggregates the figures between the Brighton & Hove and the South Downs National Park planning authority areas, it must be noted that in terms of existing and future site management and liaison with Gypsy and Traveller households, the responsibility lies with the Traveller Liaison Team within Brighton & Hove City Council. Furthermore, this disaggregation apportions need between the two local planning authorities using an agreed method of apportionment based on the location of unauthorised encampments and any specific need identified in this study. However, Gypsies and Travellers themselves, when visiting Brighton & Hove, do not necessarily choose a location based on an understanding of the difference between the two local planning authorities.
- 12.3 While household concealment and formation appeared to be small, there were a number of older children across the sample who will be of an age for household formation in the next period.
- 12.4 There appears to be a nil need from Travelling Showpeople households. However, it should be noted that Travelling Showpeople remain distinct from Gypsies and Travellers and further work may need to be undertaken to accurately understand their accommodation needs.
- 12.5 Although the pitch requirements over the 2013/14-2017/18 period are based on the best information available at the time of the study, pitch requirements for the period up to 2027/28 are based on 3% household growth figures. It is therefore recommended that this assessment of accommodation need is repeated in due course (circa 5 years) to ensure this assessment remains as accurate as possible.

- 12.6 The long term accommodation needs arising from Gypsy and Traveller households in bricks and mortar accommodation continue to be largely unknown because of the inherent difficulties in data collection. Although this assessment has successfully included a large proportion of this group, more work needs to take place around estimating the size of the bricks and mortar population and monitoring their accommodation needs. However, for this assessment a proportionate approach to data collection has been taken in accordance with other GTAAs.
- 12.7 Requirements for the provision of transit accommodation are difficult to quantify. The current level of transit provision should be sufficient to accommodate transit need within the Brighton & Hove area. However, as Chapter 11 highlights, the continued incidence of unauthorised encampments across the City suggests a need to consider whether the existing provision can accommodate the different types of visitors (in terms of family and ethnic groups, but also in terms of reasons for visiting, for example holiday or work). Consideration should be given to the identification of additional sites that could be used on a short-term basis for transit provision either through a 'hard' or 'soft' approach advocated in Paragraph 11.9. Furthermore, continual monitoring is needed to review travelling patterns and the incidence of transient unauthorised encampments, and to assess provision and requirements.
- 12.8 Finally, it is important to address the needs of Gypsy and Travellers and Travelling Showpeople identified in this assessment because it is likely to result in:
 - A continuation, and possible increase, in suppressed need from people living in bricks and mortar accommodation;
 - A continuation, and possible increase, in the number of unauthorised encampments; and
 - The possible occurrence of unauthorised developments. It is likely that these could result in enforcement, retrospective planning applications and potential planning appeals for the development of sites deemed to be in inappropriate locations.
- 12.9 The implications of the issues raised above are that:
 - New households which are forming will not be able to locate in appropriate accommodation. As highlighted above, this could result in new households resorting to stopping on unauthorised encampments or being forced to take up bricks and mortar accommodation;
 - The legal and other costs of accommodating or removing unauthorised sites will continue and may increase;
 - There may be greater conflict between the settled and Gypsy and Traveller populations as a result of unauthorised encampments in inappropriate areas;
 - The Councils fail to meet the requirements of both the Housing Act 2004 and current national planning policy, which outline the requirement for plans to be developed in order to meet the accommodation needs of Gypsies and Travellers.

- 12.10 Engaging with a broad array of partners will be essential in order to address the accommodation needs of Gypsy and Travellers and Travelling Showpeople. Effective partnership working is key for providing the best opportunity for long-term success. Effective partnership working should be developed with:
 - Internal staff and departments within the local authority to ensure a joined-up approach;
 - Elected Members;
 - Neighbouring local authorities;
 - Homes and Communities Agency;
 - Key stakeholders including health, education and training, the Police and residential social landlords;
 - Gypsies, Travellers and Travelling Showpeople; and,
 - The general public more widely.
- 12.11 Addressing the accommodation needs of Gypsies, Travellers and Travelling Showpeople is the shortest and quickest route to helping to ensure positive outcomes for members of this population. Research has shown that a lack of suitable accommodation and poor conditions is related to poor education and health as well as being at the root of ill feeling between the settled community and Gypsies and Travellers. In addition, addressing accommodation need will, in the short and long-term, reduce the costs of dealing with unauthorised encampments and development. Permanent solutions will offer the best chance for positive outcomes for all concerned and create a platform where greater engagement and cohesion can be fostered and developed.

Appendix 1: Assessment Methods

Draft practice guidance for local authorities undertaking Gypsy and Traveller Accommodation Assessments was released by the ODPM (now DCLG) in February 2006 with final guidance made available in October 2007. Specialised guidance and assessments were felt to be required as many local authority housing needs assessments were previously failing to assess or identify the needs of Gypsies and Travellers. The Guidance explains why assessments are needed, how authorities might go about conducting an assessment and issues to consider. The Guidance is non-prescriptive in terms of methods but suggests that GTAAs integrate a wide variety of evidence such as existing secondary information, views of selected stakeholders and the views of Gypsies, Travellers and Travelling Showpeople.

It is noted that the document *Planning for Traveller Sites* (DCLG, 2012) has removed the need for dedicated GTAAs from any new guidance. It states:

While the Government is keen that planning policy highlights the importance of ensuring that targets are based on robust evidence, it does not consider it necessary to prescribe to local planning authorities the type and volume of evidence required, especially as their conclusions will be tested through the process of consultation and Examination in Public of local plans. This also accords with the Government's "streamlining" objectives by removing policy that is already adequately covered by legislation. The proposed policy states that local planning authorities set their own evidence-based targets for the provision of pitches/plots. The policy does not dictate what targets local planning authorities should adopt. This is a matter for local planning authorities to decide themselves depending on the circumstances in their particular area.

However, in the absence of alternative methodologies for assessing the accommodation needs of Gypsies and Travellers, we have adopted a modified survey of the sort used in the first round of GTAAs.

This assessment was undertaken in three distinct stages. Each of these stages is described in more detail below.

- Stage One: Collation and review of existing secondary information;
- Stage Two: Consultation with key stakeholders; and
- Stage Three: Consultation with Gypsies, Travellers and Travelling Showpeople.

Stage One: Collation and Review of Existing Secondary Information

This first stage comprised a review of the available literature and secondary sources available in relation to Gypsy, Traveller and Travelling Showpeople communities. This provided an overview of the situation of Gypsies and Travellers in the study area. More specifically this included the collection, review and synthesis of:

- The bi-annual Count of Gypsy and Traveller Caravans;
- Records and data maintained and provided by the local authority;

- The previous GTAA; and
- Census 2011.

Stage Two: Consultation with Key Stakeholders

The analysis and review of existing information was supported by engagement and consultation with a small number of key stakeholders. This consultation took the form of telephone interviews which were tailored to the role of the individual. The aim of these interviews was to provide clarification on issues arising from existing data and provide an understanding of the context of current provision. Consultation was carried out with officers representing the following departments, roles and agencies: Brighton & Hove City Council; East Sussex County Council; the South Downs National Park Authority; Sussex Travellers Action Group (STAG); West Sussex County Council; the NHS; the Police; the Showmen's Guild of Great Britain; and Friends, Families and Travellers (FFT).

Stage Three: Consultation with Gypsies, Travellers and Travelling Showpeople

One of the most important aspects of the assessment was consulting with local Gypsies, Travellers and Travelling Showpeople. The fieldwork took place between February and April 2014. These consultations took the form of face-to-face interviews in order to gather information about their characteristics, experiences, accommodation and related needs and aspirations. The survey is discussed below under three sections: (1) sampling strategy and response rates; (2) questionnaire design; and (3)fieldwork and interviewers.

Sampling and Response Rates: Sampling Gypsy, Traveller and Travelling Showpeople households for GTAAs is always problematic given the absence of accurate information concerning the size and location of the communities. As such, the sampling technique for the assessment was purposive rather than purely random. The sampling strategy for the assessment differed depending upon the particular accommodation type currently inhabited by Gypsies, Travellers and Travelling Showpeople in the study area. The strategy adopted was as follows:

- Information provided by Brighton & Hove City Council and the South Downs National Park Authority stated that there was a local authority transit site (Horsdean Traveller Site) in the study area. The Community Interviewers were asked to interview every separate household stopping on that site during the fieldwork period;
- For households on unauthorised encampments, officers from Brighton & Hove City Council were asked to inform the fieldwork team when and where encampments occurred during the fieldwork period. The Community Interviewers visited these encampments but also identified and interviewed encampments on an ad hoc basis when other fieldwork sites were being visited. We were aware of three separate Gypsy and Traveller encampments during the fieldwork: the details of two were provided by the Council, while the third was discovered by the Community Interviewers during the course of the fieldwork; and
- As the population of Gypsies and Travellers in bricks and mortar housing is relatively hidden from official records, there was no sample frame from which to identify people. Therefore, in order to engage with housed Gypsies and Travellers, the fieldwork team relied on three main methods: (1) contacts of Gypsies and Travellers

who had already been interviewed as part of the assessment (on site-based accommodation, for example); (2) contacts of the Gypsy and Traveller Community Interviewers on the fieldwork team; and (3) snowball sampling where one respondent in housing recommended engaging with similar households.

A total of **51 Gypsy and Traveller households**²⁸ were surveyed. Overall, we believe that the findings for the assessment are based on reliable information from accommodation types within the study area.

Questionnaire Design: The interviews utilised a structured questionnaire whereby questions were routed according to the appropriate accommodation type. The questions were a mixture of tick-box answers and open-ended questions. This mixed approach enabled us to gather quantifiable information but also allowed for contextualisation and qualification by the more narrative responses. The survey contained the following sections:

- Current accommodation;
- Local and historic connection;
- Travelling;
- Previous housing experiences;
- Household details;
- Health services; and
- Future accommodation.

Fieldwork and Interviewers: The involvement of Gypsy and Traveller Community Interviewers was of crucial importance to engaging as effectively as possible with the local Gypsy and Traveller population. In total, two members of the Gypsy and Traveller community were involved in the assessment as Community Interviewers. These interviewers have worked with the University of Salford team on GTAAs since 2006. They are of Romany Gypsy background and live outside the study area. The Community Interviewers were briefed on the assessment and the questionnaire prior to commencing fieldwork and provided with support from the core study team members during their interviewing activity. Each questionnaire which was returned was subject to quality control and appropriate feedback was given to the interviewers. By taking this approach we found we were able to access a range of people that would not otherwise have been included in the assessment, such as 'hidden' members of the community (for example, people living in bricks and mortar housing) and those people who were uncomfortable talking to non-Travellers.