



Planning, Transport
and Leisure Services

Policy & Conservation
Gibson Building, Gibson Drive
Kings Hill, West Malling
Kent ME19 4LZ

Switchboard 01732 844522
DX TMBC 92865 West Malling
Minicom 01732 874958 (text only)
Web Site <http://www.tmbc.gov.uk>
Email LDF@tmbc.gov.uk
conservation@tmbc.gov.uk

Annex A

Hannah Lynch
Department for Communities and Local
Government
Eland House Zone 1/F8
Bressenden Place
London
SW1E 0RS

Contact **Brian Gates**
Direct line **01732 876264**
Email **brian.gates@tmbc.gov.uk**
Fax 01732 872317
Your ref
Our ref PTL5/P&C/04-03-02
Date 27 April 2007

Dear Hannah Lynch

TRAVELLING SHOWPEOPLE CIRCULAR

I am responding at officer level to the consultation on the draft Circular on behalf of the Borough Council.

The Borough Council is of the view that the whole basis of the new draft Circular is flawed because, other than the fact that the majority of travelling showpeople will live in caravans and travel for part of the year, their needs and site requirements are in no way comparable with those of gypsies (and other travellers). Notwithstanding the requirements of the Housing Act, the Borough Council does not believe that the Gypsy and Traveller Accommodation Assessments (GTAA's) are an appropriate way of assessing the needs of travelling showpeople. Their needs are such that a very different approach is required. For a start, the need should be defined in terms of numbers of sites rather than numbers of plots because each site will relate to a specific group of travelling showpeople. This is less frequently the case with gypsies.

In the view of the Borough Council the needs of travelling showpeople cannot sensibly be assessed at the local level and therefore cannot realistically be included in a GTAA. The needs of travelling showpeople need first to be assessed at the sub-regional or possibly the regional or even at national level. The place to start such an exercise is the Showmen's Guild of Great Britain which presumably has a list of its members and an indication of where their permanent bases are and presumably an idea of which of its members are "homeless" or having trouble finding a permanent site for winter quarters. This is where the efforts should then be directed in finding sites. It surely cannot be that large a problem to warrant the amount of work envisaged in the Circular. The majority of travelling showpeople are well-established and will have their own long-standing winter quarters. It is only those groups which have lost their winter quarters for some reason which have a problem that needs to be addressed. There are presumably not a lot of new groups forming and more likely just as many existing groups who are disbanding. Overall, the Circular would appear to be a sledge hammer to crack a nut.



Policy & Conservation is a Division of Planning, Transport & Leisure Services
Director of Planning, Transport & Leisure Services: Steve Humphrey MRTPI
Chief Planner (Policy): Brian Gates BSc DipTP MRTPI



INVESTOR IN PEOPLE

On the basis that the national, or at least, sub-regional situation is roughly in equilibrium what is important is that it stays in that state. What the Circular should therefore require is the following:

- The presumption in favour of providing sites for travelling showpeople should apply only to those groups who are registered members of the Travelling Showman's Guild of Great Britain;
- Existing sites in suitable locations should be safeguarded in Local Development Documents;
- If a local authority has an existing occupied site which is in an unsuitable location then it may wish to identify and allocate an alternative site within its area having regard to the needs of the travelling showmen;
- If a site is lost to an alternative use, due to reasons beyond the control of the travelling showmen group, then the local planning authority should be obliged to assist the travelling showpeople to find a suitable alternative site within that authority's area and to allocate and/or grant permission for that alternative site having regard to the needs of the travelling showpeople;
- If a group of travelling showpeople disbands then there should be no obligation on the local authority to continue to safeguard its site or to replace it;
- If a new group of registered travelling showpeople is formed then it will need to find a suitable site for its winter quarters with the assistance of the Travelling Showman's Guild which should provide evidence to the relevant local authorities on the sphere of influence/travelling circuit of the group. Any such proposals should be treated on their merits against a criteria-based policy which for consistency could most usefully be included in the Regional Spatial Strategy or alternatively various versions of it could be included in every Local Authorities' LDF throughout the country.

What this approach would be aimed at would be maintaining the status quo and not enabling local authorities to shirk their responsibilities and create problems for other authorities in the area. It would only be if the results of the initial Travelling Showmen's Guild-based assessment indicated a major shortfall in provision that this should be treated as a forward planning matter. It certainly cannot realistically be dealt with at the local level through GTAAs. What is required is a top-down approach to identifying the need for sites and in which local authority area or areas these are required. In this respect, one of the criteria that should be used in assessing where the need, if it exists, should be met is whether an authority already has a safeguarded site. If it does, then there should be no presumption that it should need to identify a second one. Attention should turn to those authorities in the area which currently have no such accommodation.

Yours sincerely

Brian Gates
Chief Planner (Policy)