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Dear Mark

PARTIAL REVIEW OF SOUTH EAST PLAN – GYPSIES AND TRAVELLERS PROVISION OF ADVICE ON PITCH DISTRIBUTION

You will have received direct from the County Council on behalf of all of the Districts in Kent, including the Medway Unitary Authority, the advice that SEERA requested on two alternative options for gypsy and traveller site pitch distributions. My Council was represented on the Steering group by the Cabinet Member for Planning and Transportation. Like other Council representative's he was only able to accept that the advice be submitted to you on a without prejudice basis. That is, without prejudice to any position that my Council may wish to take when the Preferred Options Report is published next year and without prejudice to any submission we might make to you at this stage about the technical content of the document.

We do not seek to express any preference at this stage for any option but we would wish to draw your attention to what we firmly believe to be a fundamental error in the way in which Option B has been formulated. Option B is based upon the averaging of six different distributions based upon different planning criteria. It is accepted that this was an extremely difficult task, particularly in the absence of any definitive approach to carrying out this exercise from SEERA. In this respect, we fail to see how you are ever going to be able to compare one County/GTAA area's results with another.

Be that as it may, our main concern relates specifically to one of the criteria which is "development on previously developed land" (Criterion 3). We have no philosophical objection to the use of this as a proper planning criterion but you will notice that, in the case of Kent's submission the surrogate for this is the amount of committed and unimplemented local plan allocations and/or planning permissions for housing on previously developed land. We consider this to be a totally unrealistic criterion which totally distorts the overall figures. It is not contested that in certain circumstances previously developed land allocated for housing might be equally suitable as a site for gypsy and traveller accommodation. Our concern is that including previously developed sites which already have planning permission for housing is totally unrealistic in terms of



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deliverability. In these cases land values would already be set at an unrealistically high price for the provision of a caravan site by either the local authority or a gypsy family.

In the case of Tonbridge and Malling we are proud of the very high proportion of our housing that is to be provided on previously developed land, but the great majority of it already has planning permission. Of the 549 hectares identified in Table 3 as being committed housing land on pdl in Tonbridge and Malling, only 6ha is allocated housing land without planning permission. It is impossible, without knowing the comparable figure for each other District to say what the implications of this might be, but I trust you can appreciate that such a significant difference in our case is likely to result in a very different answer in the final column. This in turn will inevitably affect the average figures for Option B in Table 7. There is also concern that there is no weighting given to the various criterion.

Finally, in relation to the Options paper, we were stuck by the results of the Stakeholder Workshop as to how important the Gypsy Community regarded meeting need where they wanted to live. The GTAA figures given in the Options Paper and used to distribute pitch requirements relate to the identification of need where it is generated and not on the basis of gypsy and traveller preferences. Information is available, at least from the GTAA prepared by David Coutie Associates for the West Kent Area on gypsy and traveller preferences and should in our opinion have been given greater weight bearing in mind the views of the gypsy community.

I refer now to your email of 12 October about public consultation arrangements for the Preferred Options Stage. We would not support a district-based consultation event. In Kent we now have a well-established Countywide Stakeholder Forum for considering and progressing consultation on the Gypsy and Traveller Review. It has been used to good effect on two occasions to consult on the evolution of the advice on the Options. It would be therefore be my strong preference for this arrangement to prevail as the main means of direct contact with the gypsy and traveller community and other relevant stakeholders. Wider publication could be undertaken directly by SERRA with press releases and leaflet distribution. In my view, a District-based consultation exercise would be doomed to failure because it would be dominated by site-specific issues which are not relevant at this stage. A county-based forum would be much more appropriate when the issue is not where in a district accommodation should go but what distribution between districts is most appropriate.

I trust you find this informative and that you take seriously our concerns about the submission you have received from Kent.

Yours sincerely

Brian Gates
Chief Planner (Policy)