

Partial Review of the Regional Spatial Strategy for the South East

Gypsies, Travellers and Travelling Showpeople

Statement by Tonbridge and Malling Borough Council in respect of: Matter 1 – Overall Regional Provision

The Borough Council fully supports the **Joint Statement** in respect of Matter 1 prepared by Kent County Council in conjunction with the local authorities in Kent.

In particular, the Borough Council strongly supports the case put forward in the Joint Statement in response to **Matter B9** supporting a further rebalancing of regional provision bearing in mind the disproportionate level of provision there is currently in the County compared to elsewhere in the South East. This is in line with Government advice which advocates an element of redistribution. In this respect, it is noted that the Gypsy and Traveller community itself was in support of Option C which sought to redistribute 50% of the requirements around the region thereby ensuring a somewhat more equitable distribution and opening up opportunities where they currently do not exist.

Option D was selected by the Regional Planning Body as its preferred option on the basis that it was a “deliverable compromise”. It is submitted that this is not a sound basis for the planning of gypsy and traveller provision in the South East in the face of overwhelming support for the alternative Option C. By the time a proportion of the redistributed figures are allocated back to the original County areas there is little actual redistribution from the areas currently making the greatest provision. For example, in the case of Kent (including Medway), the requirement amounts to nearly a third of the total regional provision, whereas places like Oxfordshire, for example, are required to provide only 6%, which is less than its current proportion of the base-line level of provision.

On the issue of **Travelling Showpeople** the Borough Council likewise specifically supports the response in the Joint Statement to **Matter D**. As indicated in its formal submission, it does not believe that a distribution of single showmen pitches widely across the region is a credible solution when Travelling Showpeople normally travel and settle in groups rather than individually. The actual need for a Travelling Showmen’s site relates to their performance circuit and the adequacy, availability and location of existing facilities within proximity to that circuit rather than any form of demographic projection of need, so the same approach as for Gypsies is not appropriate. In the view of the Borough Council the evidence-base simply does not exist that can justify a meaningful District-based distribution, but this is a matter that can only effectively be dealt with at the regional level because of the peripatetic nature of the activity.

**Statement by Tonbridge and Malling Borough Council in respect of:
Matter 2A – Sub-Regional Assessment and Provision: Kent and Medway**

The Borough Council fully supports the **Joint Statement** in respect of Matter 2A prepared on behalf of the four authorities who were jointly responsible for commissioning the GTAA for the West Kent Area. The Joint Statement addresses specifically points numbered (i) and (iv) in the list of Matters. This statement responds to Matters 2A(v) and (vi) and deals with them together.

The Borough Council's view is that the total figure for Kent should be reduced on the basis of Option C for the reasons set out in the Joint Response in respect of Matter 1 [B(9)]. In so doing this pays regard in some respects to planning and sustainability criteria in that the pattern of environmental constraints is one of the criteria used by the RPB in reallocating the 50% of provision around the region. Although a revised Option C was never published by the RPB our assessment in Kent is that this would result in a Kent total of 262 pitches. This would still be a quarter of the total regional provision.

When it comes to the local level within Kent the Borough Council believes that this lower County total of 262 pitches should be distributed between the districts having regard to the pattern of local need (ie using Option A as a baseline rather than Option B). There are three main reasons for preferring this approach. Firstly, it gives greater weight to meeting local need (Option B is not a needs-based distribution). Secondly, in the case of Kent, the Council believes that, although generally well conceived, Option B is fundamentally flawed in one important respect. In preparing Option B the County Council used a number of different criteria, one of which was the amount of development on previously developed land. In itself, this is a sensible criterion, but the County Council used as a surrogate for this the amount of uncommitted local plan allocations and planning permissions for housing on previously developed land. The Council's concern is that including sites with planning permission is totally unrealistic in terms of the delivery of gypsy accommodation. In the case of Tonbridge and Malling, where there is a very high number of permitted units on previously developed land (543 ha permitted/only 6 ha allocated) using this criterion totally distorts the final figures in Option B. Furthermore, Option B can have little credibility region-wide because, in the absence of any clear advice from the RPB, there was no consistency between the Counties as to the way it was generated.

If the County-wide reduced total of 262 under Option C is distributed across the County on the basis on Option A rather than Option B then the figure for Tonbridge and Malling would be 12 pitches which the Borough Council would find acceptable. Otherwise, under the RPB's preferred Option D, Tonbridge and Malling ends up with a greater requirement (18 pitches) than its own local need (14 Pitches) even though option D is supposed to be redistributing pitches away from Kent, and this is for a local authority which is three quarters Green Belt and with an extensive part of the Kent Downs AONB.

If this argument is not accepted by the Panel then the Borough Council is prepared to accept as a fall-back position that the option promoted by Kent County Council in its submission (known as Option E) should be adopted as the preferred option for Kent and Medway. This would result in a requirement of 13 pitches for Tonbridge and Malling.