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Annex C

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South East Plan Partial Review
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Dear Barbara

REGIONAL SPATIAL STRATEGY PARTIAL REVIEW – EIP

I am writing in response to the Panel's request for any comments prior to the end of the EIP, on the draft policy and pitch distribution tabled by the Showman's Guild at the end of the session on Wednesday and the revisions to Policy H7 put forward by the South East Planning Board.

My Council objects in the strongest terms to the policy for Travelling Showpeople suggested by the Showman's Guild of Great Britain, both in terms of its content and the proposed pitch distribution. The policy is unnecessary and deals with matters of detail inappropriate to a Regional Spatial Strategy. In particular, the suggestion that sites previously refused planning permission should automatically be considered for allocation is unacceptable. They were presumably refused planning permission for good reason in the first place. Neither is ownership by Travelling Showpeople in itself an appropriate planning criteria for the allocation of a site, though it may be material to delivery. However, to suggest that mere site ownership should form the basis of the regional distribution is totally unacceptable.

The pitch distribution for Kent suggested by the Showmen's Guild (Document 6.28) is totally unacceptable to my Council. I presented evidence to the EIP and referred the Panel to an appeal decision (ref APP/H2265/C/00/1056775-91 – Document 6.26) that confirmed that the site for 8 families referred to in Tonbridge and Malling by the Showmen's Guild lies in the Green Belt and is totally unacceptable for such a use. The fact that a group of travelling showmen with no prior connection with the area and no demonstrable need to be located in the area speculatively acquired an unacceptable site in the Borough is no rational planning justification for the setting of pitch requirements in the RSS.

In making comments on the draft Circular for Travelling Showpeople my Council suggested that the best approach to ensure an equitable distribution of sites would be



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for those authorities that already have sites to ensure that they are safeguarded and for those authorities which have no such sites to be required to make provision. For the record, there is already one site in Tonbridge and Malling and this is statutorily safeguarded in our adopted LDF.

With regard to the SEPB suggested rewording of Policy H7 (Document 6.25r) my only comment would be that the words "through proactive use of development control powers" are exactly the sort of thing that the Planning Officers Society have been arguing against for many years. In terms of Plain English why not simply say "through granting planning permission".

I trust the Panel will be able to take these views into account.

Yours sincerely



Brian Gates
Chief Planner (Policy)