

# Dartford Development Policies Plan

## *Gypsy, Traveller & Travelling Showpeople Implementation Strategy Update*

*Incorporating actions to identify future land/site supply and a review of five year supply of pitches  
and plots*

**DARTFORD**  
**BOROUGH COUNCIL**

**Submission June 2016**

## Contents

1. Introduction.....	1
2. Policy context .....	3
3. Historic and Current Patterns of GTTS camping in Dartford .....	8
4. Future supply – Opportunities and Constraints .....	11
5. Identification of Need.....	12
6. Five year supply of land for GTTS needs .....	18
7. Site/ land identification options to be explored .....	20
8. Addressing transit need.....	28
9. Summary and Next Steps .....	28
Diagram 1: GTTS sites in Dartford .....	9
Table A: GTAA Estimated number of Households and accommodation types.....	14
Table B: Dartford GTTS accommodation need 2013 to 2028 .....	15
Table C: Identified Five Year Supply .....	19
Table D: Primary Site Identification Options .....	20
Table E: Site Assessment Considerations .....	22
Table F: Detailed actions to be applied in investigating land/sites within each option type .....	25

## 1. Introduction

- 1.1 The Council pledged to produce an Implementation Strategy to help delivery of its Local Plan policies on gypsies, travellers and travelling showpeoples'<sup>1</sup> (GTTS) accommodation. This will provide the basis of ensuring an ongoing supply and delivery of gypsy and traveller pitches and showpeoples plots in Dartford Borough to meet future identified needs.
- 1.2 This document sets out a Strategy to meet GTTS future camping accommodation needs. The document specifically sets out the local context, and level of need and actions that will be taken to identify future supply of land and sites for GTTS. Additionally it sets out the specific sources of five year pitch/land supply for GTTS which have been identified as available in the immediate/ short term.
- 1.3 The Implementation Strategy is a 'living document' initially providing local context and detailed actions to be taken to identify and maintain GTTS land supply. The Strategy will be regularly updated and it will set out the outcomes and findings of identified actions. It will also set out progress on site delivery and provide updates to identification of a five year supply of land to accommodate GTTS needs. The document will be frequently reviewed and republished as progress is made with the various work streams and actions identified in the Strategy.
- 1.4 An Implementation Strategy setting out specific and targeted supply options and actions that can monitored and reviewed, is considered to be the most appropriate way to address future GTTS needs in Dartford, and more flexible and responsive than depending on a one-off general identification of sites. Much of GTTS short term need in the Borough particularly relates to gypsies and travellers living in inappropriate accommodation or locations. An approach to focusing on options, that take into account the context and constraints in the Borough at an early stage, will enable the Strategy to: respond to the needs and aspirations of local households in need; achieve sustainable development in the local context; and, enable meaningful engagement with stakeholders, GTTS and settled communities at an early stage.

---

<sup>1</sup> The term 'travellers' in the document has been used to describe both gypsies and travellers.

1.5 The document considers both context and need:

- Chapter 2: The national and local planning policy context including the emerging Development Policies Plan
- Chapter 3: Historic and current patterns of GTTS camping in Dartford Borough
- Chapter 4: Future supply - opportunities and constraints
- Chapter 5: Identification of need: the findings of the 2014 Gypsy, Traveller and Travelling Showpeople Accommodation Assessment. It includes the current supply, GTTS population residing in the area and the level of need for pitches and plots identified by the study, and subsequent permissions.

1.6 The latter parts of the document set out actions required to fully accomplish the Strategy:

- Chapter 6: Site/ land identification options being explored to ensure future accommodation needs are met and further information on each option.
- Chapter 7: A five year supply of deliverable pitches and plots to meet forecast need
- Chapter 8: Addressing Transit need

1.7 Finally, Chapter 9 sets out a brief summary and identifies some key next steps.

## 2. Policy context

### *Local Plans*

- 2.1 Dartford Core Strategy Policy CS20 sets out the Council's approach to meeting an agreed requirement for traveller pitches and travelling showpeople plots. The policy provides a number of factors that will be taken into account in identifying suitable sites. These include:
- a) Impact of proposed pitch provision on adjacent residential communities;
  - b) Accessibility of a proposed location to educational, health, community facilities and public transport;
  - c) Protection of the openness of the Green Belt (CS13);
  - d) The availability and delivery of sites;
  - e) Other planning constraints, including flood risk.
- 2.2 Policy CS20 states that the potential for additional pitches will be explored at new locations alongside extensions to existing sites.
- 2.3 Progress on the development and implementation of policy and site allocation for gypsies in the Borough has been delayed by lack of certainty on the national approach towards gypsy and traveller sites, since the 2011 Core Strategy. Uncertainty has been created through Ministerial intervention in planning appeals with decisions taking up to two years from the point of initial Inspector consideration; and consultation on new national government policy, with a long period prior to its introduction. Nonetheless, during this time of uncertainty, the Council has been active in seeking appropriate local solutions to GTTS need in the Borough, with 16 pitches approved by the Council and a Gypsy and Traveller Need Assessment carried out. It is now appropriate to progress the Dartford GTTS Implementation Strategy, in compliance with the commitment expressed in Policy CS20.

- 2.4 The emerging Development Policies Plan sets out further policy with regard to GTTS accommodation. Policy DP10 states that the Council will identify a supply of pitches and plots to meet identified need and that a five year supply of sites will be maintained through a range of actions: determining planning applications expeditiously in line with local and national planning policy; and maintaining and monitoring a continuous supply by ensuring the actions set in the GTTS Implementation Strategy document are carried forward.
- 2.5 Policy DP10 additionally sets criteria which must be met by proposals for GTTS caravan development determined through the Council's development management function.

*National Planning Policy*

- 2.6 The National Planning Policy Framework (NPPF) 2012 and Planning Policy for Traveller Sites (PPTS) 2015 contain the national policy approach that should be used in plan making, and taken into account as a material planning consideration in the determination of planning applications for GTTS caravan accommodation.
- 2.7 For this topic, the focus is on the PPTS policy document issued by the Government in August 2015. It states that the Government aims are:
- a) local planning authorities make their own assessment of need;
  - b) local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites;
  - c) local authorities to plan for sites over a reasonable timescale;
  - d) plan-making and decision taking should protect Green Belt from inappropriate development;
  - e) promotion of private traveller sites, albeit recognising that some travellers cannot provide their own sites;
  - f) that the above, through plan making and decision taking will reduce the number of unauthorised developments and encampments;
  - g) Local Plans to include fair, realistic and inclusive policies;
  - h) to increase the number of authorised site in appropriate locations;
  - i) to reduce tensions between settled and traveller communities;
  - j) provision of accommodation at locations where GTTS can access local facilities and services; and,

k) that local planning authorities give regard to protection of local amenity and environment.

2.8 To achieve these aims local planning authorities should assemble evidence to establish accommodation needs. This should include engaging and cooperating with settled and traveller communities, and collaborating with other local authorities to maintain an up-to-date understanding of future need. Pitch and plot targets should be set through the preparation of the Local Plan. In producing their Local Plan, local planning authorities should identify a supply of specific deliverable sites sufficient to provide 5 years' worth against their locally set targets and update these annually. In addition, further sites or broad locations for a further 6 to 10 years should be identified.

2.9 A Dartford Gypsy, Traveller and Travelling Showpeople Accommodation assessment (GTAA) was carried out during 2014 supporting the Development Policies Plan.

2.10 The PPTS specifically defines those groups of people covered by the policy requirements. For gypsies and travellers this includes:

*'Persons of nomadic habit of life.....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.....'*

and for travelling showpeople:

*'Members of a group organised for the purposes of holding fairs, circuses or shows' and contains the same exclusions as above but in addition includes grounds of 'more localised pattern of trading'.*

This revised definition was provided in the updated PPTS August 2015.

2.11 PPTS 2015 Annex 1: Glossary changed the definition of a gypsy, traveller or travelling showperson for the purposes of planning policy. The definition is now confined to those who have stopped travelling temporarily rather than permanently and requires GTTS to demonstrate a nomadic habit of life, albeit even if this has stopped for a temporary period.

The new definition has changed the focus in the context of plan making and evidence gathering requirements under the PPTS.

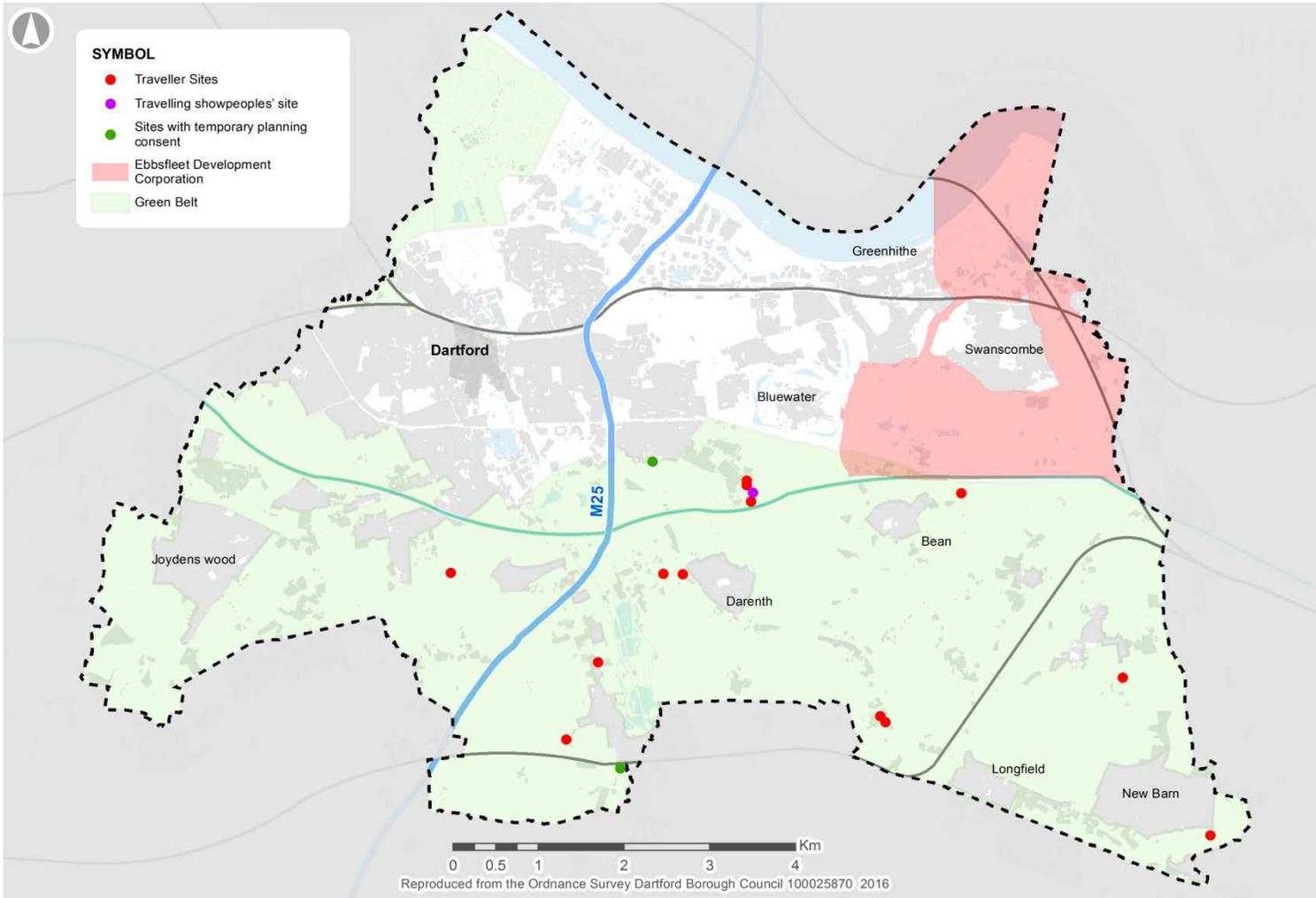
- 2.12 The inference of the change is that pitch and plot need and requirements under PPTS are likely to be reduced, since the number of households meeting the new definition are likely to be lower.
- 2.13 In addition, the revised PPTS states that new guidance on producing Traveller Accommodation Assessments will be issued by the Government on how to assess local needs and nomadic habit. However, this has not yet been produced and no guidance has been provided regarding a transitional approach to existing local accommodation needs assessments and policies. Dartford's need assessment was carried out in advance of the new policy and definition and, therefore, reflects all GTTS need under the old definition. That is, the findings have not been based upon a consideration of whether those identified lead a nomadic lifestyle.
- 2.14 The significance of the change in definition and impact on plan making is a key consideration in producing the Dartford Local Plan and the Implementation Strategy, which is supported by evidence predating the current national definition. The potential uncertainty regarding assessment of need in accordance with national planning policy leads to a requirement to look carefully at both short term priorities and longer term actions, to avoid undue delay.
- 2.15 PPTS 2015 clearly sets out that new traveller sites (whether temporary or permanent) in the Green Belt constitute inappropriate development and provides an approach allowing some weight to be afforded to certain considerations in establishing whether or not 'very special circumstances' exist for development management purposes. It is clear that some considerations are unlikely to outweigh harm to the Green Belt. This indicates that in identifying a supply of sites and pitches, very careful consideration must be given to the potential harm to the Green Belt. It should be noted that a significant land area of Dartford Borough is designated Green Belt, which can be found predominantly to the south of the A2 and to the north-west at Dartford Marshes.

- 2.16 In responding to the change in definition the Council has had to choose whether to postpone updating GTTS policies in the Development Policies Plan in order to update the evidence base with regard to need. Postponement could significantly delay future legitimate planned provision; and potentially increase uncertainty through additional appeals and the potential for unauthorised development. Planning for provision in Dartford Borough has already been subject to delay and uncertainty due to national interventions in local sites (explained further in the next section).
- 2.17 The risk of having insufficient planned suitable land supply and lack of local planning policies that can be used in determination of planning applications, could result in GTTS developments occurring in the Borough that are not appropriate and could otherwise be resisted.
- 2.18 Alternatively, progressing GTTS policies and an agreed Implementation Strategy will enable greater certainty for communities and individuals through a planned and more collaborative approach to the delivery of GTTS accommodation requirements.
- 2.19 Technical adjustment made by Government in summer 2015 clarifies that those who fall outside of the definition given in PPTS Annex 1 must have their accommodation needs addressed under the provisions of the National Planning Policy Framework. This has been further bolstered through removal of the legal requirement for local authorities to undertake separate gypsy, traveller and travelling showpeople accommodation assessments in the newly enacted Housing and Planning Act 2016. The NPPF requires local planning authorities to prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs including the need for all types of housing. The Dartford SHMA will be updated to support the Dartford Core Strategy review programmed to commence from winter 2016/17 onwards.
- 2.20 Apart from planning policy requirements pertinent to assessing the suitability of sites, the Caravan Sites and Control of Development Act 1960 sets out that the Council is also responsible for site licensing requirements with regard to provision of traveller pitches (although this does not extend to travelling showpeople plots). This prohibits the use of land as a caravan site without a site licence and the interdependency between licensing and planning requirements has been reflected in the draft Development Policies Plan.

### **3. Historic and Current Patterns of GTTS camping in Dartford**

- 3.1 All sites providing pitches and plots for GTTS in Dartford are located in the Green Belt in rural or edge of village locations. Diagram 1 shows the current distribution of GTTS caravan sites in the Borough.
- 3.2 Some sites have been established for over 50 years with the majority of sites owned and operated privately. Some cater for close and extended family camping needs; others accommodate families and members of the wider community or business associates. There is a mix of Romany gypsies and English/ Irish travellers residing at the GTTS sites within the Borough. One public site, Claywood Lane, is owned and operated by the Council. In addition, a large, long established, travelling showpeoples site is managed by one operator.
- 3.3 Existing sites hold a mix of types of planning consents and site conditions. Previous appeal decisions have resulted in grant of temporary consents in the Green Belt or given personal permission for the applicant and their dependants.

Diagram 1: GTTS sites in Dartford



X:\Data\_Store\Departmental\_Data\Regeneration\_Directorate\Planning\_Policy\Gypsy\_& Traveller\_Sites\_20160125\01\_Project\_Files\Gypsy&Traveller\_Sites\_A4\_Land\_20160205.mxd

- 3.4 Since the 2014 GTAA five planning appeals have been determined after a delay of up to 2 or more years from the original hearings. This was caused by them being recovered by the former Secretary of State for their determination and then later de-recovered for determination by a Planning Inspector. This followed a successful legal challenge regarding the legality of the approach to recovery.
- 3.5 Household accommodation need which was identified at each appeal was incorporated in the Dartford GTAA findings. Two traveller caravan pitches have been granted permanent permission and therefore provide two pitches against identified need<sup>2</sup>. The appeals resulted in temporary permission being granted for three pitches, and therefore the accommodation need for these pitches remains live. It is usual practice in GTTS assessments to consider temporary permissions as an indicator of likely future need. The three consents were for development at two new sites and extension to another<sup>2</sup>.
- 3.6 The circumstances described above have resulted in three future pitch requirements contributing to a backlog of need which has been carried forward into future requirements<sup>2</sup>. Primarily this has been caused by delays through Government interventions in implementing national planning policy on GTTS and has resulted in ongoing local uncertainties with regard to future requirements for planning provision and supply.

---

<sup>2</sup> One allowed appeal is currently subject to potential judicial review.

## 4 Future supply – Opportunities and Constraints

- 4.1 Areas of the Borough outside of the Green Belt are wholly or partially urbanised, particularly to the west, in the area close to the London boundary. The area is dissected by two key national road networks, the A2 from London to Dover and the M25 London orbital motorway.
- 4.2 This area has been, and remains, a focus for regeneration within the Thames Gateway Growth Area. A large number of former industrial sites, quarries and some greenfield sites have been identified for both residential, employment and other supporting development over the next 10 to 20 years with a large proportion already in receipt of outline planning consent. Development under the Core Strategy is concentrated in three broad urban areas; Dartford Town Centre and a former industrial area to the north; Ebbsfleet to Stone which incorporates the proposed Ebbsfleet Garden City; and Thames Waterfront largely consisting of former industrial sites.
- 4.3 The Borough-wide overall spatial development pattern is set out in the Dartford Core Strategy 2011, leading to a scale of growth resulting in a 43% increase in Dartford's population. In identifying sites and areas to accommodate this growth, the Core Strategy sets out policies to safeguard and ensure provision of green space, mechanisms for reducing car travel and other measures to ensure planned development is sustainable and creates positive environments for residents.
- 4.4 Taking the above factors into account, there are a limited number of potential land supply options in the urban area which can be investigated. However, given the national policy emphasis on the inappropriateness of development in Green Belt, these must be explored in advance of Green Belt options. The following options will be explored:
- accommodation as part of large planned sites including within the Ebbsfleet Development Corporation area (which covers 29% of the total land area of the Borough outside Green Belt);
  - publically owned land in the urban area;
  - previously developed sites in the urban area which are now vacant or where the current use is set to cease;
  - greenfield land in the urban area where local or national policy is not a constraint to GTTS development.

- 4.5 These sources of land supply in areas outside of Green Belt all represent further opportunities for land supply that should be further explored (see later sections).
- 4.6 With regard to travelling showpeople requirements, it is generally accepted that fairground equipment is becoming more complex and significantly bigger, requiring large land area requirements for residential caravan accommodation, parking and storage, and specific access needs onto a site. In many cases sites may need to accommodate up to several households who work on fairground activities together. Whilst this represents different land requirements than for gypsy pitches, urban sites that provide easy access to the trunk road network would provide a better location than travelling showpeoples sites requiring access via narrow rural lanes. In addition to traveller sites, urban land sources above may provide opportunities for sustainable showpeoples accommodation.
- 4.7 The Dartford rural area is wholly designated as Green Belt. This is a constraint to the provision of GTTS caravan sites in the rural setting, due to GTTS development being identified in national planning policy as inappropriate in the Green Belt.
- 4.8 Whilst the Implementation Strategy should explore opportunities that may exist for GTTS provision in the urban area, it is acknowledged that the future planning context for areas outside of Green Belt in the Borough, taking account of the quantum and locations for development growth, provides both constraints and opportunities in identifying urban land supply for future GTTS need. This results in a requirement that the Implementation Strategy consider a number of different sources of supply both in the urban area and potentially within some Green Belt locations within Dartford.

## **5 Identification of Need**

- 5.1 The Council commissioned Salford Housing and Urban Studies Unit at University of Salford to prepare an updated Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) for Dartford in April 2013. The study has been a key contributor to inform and support the preparation of Dartford's Development Policies Plan.

- 5.2 The study was prepared and carried out using an established methodology applied in other local authority areas in the country and by many other local planning authorities in Kent. Importantly, it sought to assess the accommodation needs of all GTTS who met the planning definition contained in the previous version of PPTS (2012). This referred to persons of nomadic habit of life, but also included people who had ceased to travel both temporarily and, in contrast to the current definition, *'permanently'*.
- 5.3 An understanding of GTTS lifestyles and current accommodation circumstances, together with future accommodation need and aspirations was obtained through a survey of 58 traveller households in Dartford (46% of the estimated population) undertaken in May 2013. In addition the study drew upon relevant information from key stakeholders where this could be obtained, Dartford Borough Council, bi-annual caravan count and 2011 Census data.

#### *Key Findings of the Dartford GTAA 2013*

- 5.4 The study indicates that the resident traveller population in Dartford in May 2013 was estimated as 408 individuals comprising of 127 households. These were distributed between the following accommodation types:

**Table A: GTAA Estimated number of Households and accommodation types**

Type	Estimated number of households
Socially rented	16
Private sites with permanent permission	44 <sup>1, 2</sup>
Unauthorised developments	5 <sup>3</sup>
Bricks and mortar housing	50 <sup>4</sup>
Travelling showpeoples' site	12 <sup>4</sup>
Total	127

**Notations**

1. Seven households were estimated to be accommodated on unauthorised pitches but evidence indicated that they were effectively immune from enforcement action.
  2. The number of households is likely to be lower due to long term vacancies
  3. Two pitches within one site were considered to be effectively immune from enforcement actions and the remaining three were sites that were subject to appeal (see Chapter 3)
  4. Estimated
- 5.5 The survey indicated a number of local characteristics. The average household size was 3.4 persons although this varied between different accommodation types and was lowest at private sites. In general, the community appeared settled with little intention to move and with long-standing local connections. The population was largely Romany gypsies, with significantly smaller proportions of Irish travellers and travelling showpeople. Only five households indicated that they could afford to purchase new land.
- 5.6 The consultants provided what was considered to be a reasonable and robust assessment of need derived from the findings of the surveys undertaken with traveller households in Dartford. The study has focused primarily on the constitution of local and historic need recorded in the survey findings and applied these to the estimated population and distribution in the district. The findings are set out below.

**Table B: Dartford GTTS accommodation need 2013 to 2028**

Need arising from (type)	Pitches	Plots
2013 - 2017		
Concealed households	5	
New household formation	3	1
Unauthorised developments	3	
Net movements from housing to sites/sites to housing	2	
<b>Total (2013 to 2017)</b>	<b>13</b>	
2018 - 2022	10	1
2023 - 2028	11	1
<b>Total</b>	<b>34</b>	<b>3</b>

5.7 The consultants have used a standard compound growth rate to pitch need arising beyond 2017 and have assumed that this will represent site based accommodation. The study recommends that household growth should be kept under review and additionally that a further assessment of accommodation need is repeated in due course to ensure it remains as accurate as possible. This is expected to take place as part to support the forthcoming programmed Local Plan review.

#### *Change to the planning definition of GTTS*

5.8 Paras 2.6 to 2.16 above describe the changes made to the definition of GTTS and implications for national policy requirements. In addition the change, without any guidance regarding transitional arrangements, has resulted in the Council needing to consider how local evidence, planning policy and planned supply should be taken forward. Careful consideration has been given to the scope to adapt the findings of the GTAA to take account of the new definition and in turn for this to inform policy requirements.

5.9 The consultants who carried out the GTAA on behalf of the Council have considered whether this might be feasible based on their findings and taking account of the primary data acquired through fieldwork surveys. Overall, they consider that the questionnaire did not sufficiently explore issues with regard future intentions to travel, which would enable a proper assessment to be made of whether individual households may have ceased to travel temporarily. The question of future intention is a specified matter set out in the PPTS to assist local planning authorities to determine whether persons are gypsies and travellers for the purpose of the policy.

- 5.10 The Dartford GTAA findings on travelling habits can be found in section 7 of the report which discusses travelling experiences of those surveyed. This indicates that the vast majority of respondents reported that they never travelled or travelled for short periods. The highest recorded level of travelling was 11% of respondents from private sites who said that they travelled every month. Overall, 40% of gypsy and traveller respondents living in caravans said they never travelled. This increased to 56% when taking account of those who said they travelled once a year and 87% taking into account those who said they travelled a few times a year.
- 5.11 However, these findings did not differentiate between other members of each household interviewed who may travel more frequently. Experience indicates that within the gypsy and traveller community, male family members may in some instances travel for work or to horse fayres, leaving female members at the site. The primary survey data does not sufficiently differentiate between the reasons as to why respondents or other members of their household did not travel: whether it was choice, educational, health needs or old age.
- 5.12 Overall, it is very difficult to disaggregate the survey response sufficiently to provide a robust breakdown of the number of GTTS households who meet the revised definition in the Borough. However, it is noted that consultants state that the main reason provided for no or limited travel was children's education. Under PPTS this could be a reason why a household have ceased to travel temporarily and could result in a household being treated as GTTS within the planning definition.
- 5.13 Of travelling showpeople, 40% of respondents indicated that they never travelled, with only 20% travelling every week. However, it is likely that some households may have been away from the site at fairs and showgrounds during the period of the survey. Overall, it is noted that the nature of travelling showpeople need is usually to provide a permanent base from which to operate a travelling business and a site is likely to be more utilised for 'permanent' accommodation outside of the fairground season.
- 5.14 Taking into account these findings, the Council considers that planning for short to medium term accommodation needs should be based on the current assessment for the purposes of the Development Policies Plan (Submission June 2016), so as to prevent delay in identifying pitch requirements. The identified requirement includes those households assessed as part of

the backlog of need due to the grant of temporary permission. Based on the above evidence (paras 5.8 - 5.13 above), it is likely that the assessment of need is more than sufficient to plan for the accommodation needs for those that meet the revised planning definition. A revised assessment will be undertaken, alongside other evidence studies such as the SHMA, to support accommodation requirements in the preparation of the next Local Plan.

*Planning Permissions Granted since the GTAA*

- 5.15 Plots 4, 5 and 6 at Knoxfield caravan site received grant of permanent planning consent in July 2013 for the stationing of 16 caravans (a maximum of 13 static caravans). Whilst the plots previously benefited from planning consent for 9 caravans, they had remained vacant for several years.
- 5.16 The site owner has implemented the permission and some pitches have been provided and are occupied. However, specific conditions of the consent have not currently been approved. Council officers have been liaising with the applicant regarding the matter and outstanding conditions are currently determining a discharge of condition application. Taking into account the willingness of the site owner to work with Council officers to resolve outstanding planning conditions, the site remains a significant source of the Five Year supply for traveller pitches.
- 5.17 Additionally permanent permission was granted for gypsy caravans (representing two pitches) at Shirehall Farm in July 2015 and at Nurstead Stables January 2016. These developments directly address backlog of need identified in the Dartford GTAA. However, the Council is currently seeking to challenge a High Court decision with regard to applicability of interpretation of the NPPF in regard to the Shirehall Farm decision. Therefore the planning status of this site currently remains uncertain.

## 6 Five year supply of land for GTTS needs

- 6.1 Based on the GTTA findings of need for traveller pitches and travelling showpeople plots, the maximum requirement to 2021 in Dartford is; **19 pitches for gypsies and travellers and 2 plots for travelling showpeople.** These requirements provide a generous understanding of local need in respect of those who meet the national planning policy definition of gypsy, travellers and travelling show people (see previous chapter).
- 6.2 The GTAA states in its executive summary that ‘the population have little intention to travel. Travelling tends to be for one to two weeks per year and generally to visit fairs or relatives. Very little travelling is for economic purposes’. Therefore the Council, in identifying sufficient land and site supply to meet the capacity stated above, will provide for local need together with providing options for those persons who culturally prefer to live in caravan accommodation on a permanent basis. The requirement also takes account of backlog of 8 pitches and 1 plot from 2013 to 2016 (arising for specific reasons noted previously).
- 6.3 PPTS states that a five year supply of land and sites must be deliverable i.e. the sites should be available now, offer a suitable location and have a realistic prospect that pitches/plots will be delivered within 5 years.

**Table C: Identified Five Year Supply**

<u>Gypsy and Traveller Pitches:</u>		
<i>Identified Need 2016-2021</i>	<b>Up to 19</b> (wider than PTTS definition of need)	
<b>Sites with planning consent since May 2013:</b>		
Knoxfield Plots 4 to 6	13	
Nurstead Stables	1	
( <sup>3</sup> Shirehall Farm	1)	
	Sub-Total <sup>3</sup> 15(or 14)	
• Therefore up to 4 (or 5) are required from the following:		
<b>Publically Owned Land</b> (subject to further assessment see table F):		
	Estimated at up to- 11	
<b>Long Term Vacant Pitches, regularisation and additional pitches at existing sites</b> (subject to further assessment see table F):		
	Estimated at up to- 12	
<i>Up to Supply</i>	<i>Total 14 or 15 +11+12</i>	<b>=37 or 38</b>
<u>Travelling Showpeople :</u>		
<i>Identified Need 2016-2021</i>	<b>2</b>	
<b>Intensification (additional pitches within existing site)</b>		
Darenth Wood Travelling Showpeople Site	2	

6.4 As discussed in the previous chapter, Knoxfield is considered to provide a significant number of new pitch capacity, notwithstanding meeting planning conditions, full implementation of the planning consent is expected shortly. Based on recent caravan counts, it appears that there are several long term vacancies at some traveller sites in the Borough. It is considered that these provide the most immediate and short term potential to provide for identified need. This option will be explored as a priority, together with potential for sites in the urban area. A summary of the initial findings of investigation of prioritised options is provided in Table F.

6.5 Overall, based on planning consents granted since the Dartford GTAA together with potential immediately available pitches at other sites provides up to 14 (or 15) deliverable pitches (equating to 74-79% of the requirement of up to 19). The five year supply will be achieved with potential further pitches at new sites on publically owned land, at existing sites with long-term vacancies, and sites which may have potential for regularisation which, are considered to have strong potential to come forward in the next five years whilst further

<sup>3</sup> Subject to outcome of Challenge of a High Court Appeal

investigation of other options continues. These deliverable pitches and opportunities provide the basis to establish a 5 year pitch supply that would be more than sufficient to meet identified need and demand from those GTTS who do not meet the planning definition but have a preference to live in caravan accommodation.

- 6.6 The Darenth Wood Travelling Showpeople site provides for up to 20 caravans and equipment, although annual count evidence and discussion with the owner suggests that the site is not at capacity. It is considered that the site offers sufficient land availability for an additional 2 plots to meet future identified need.

## 7 Site/ land identification options to be explored

- 7.1 The remainder of the document details a way forward for delivery of sites in future years. This will be the focus of the next phase of work and updating of the strategy to ensure that the identified land supply in the Borough is used to address local needs and that a deliverable five year supply is maintained over future years.
- 7.2 A number of options to identify additional pitches and plots have been identified and are shown in table D below. Taking into account the opportunities and constraints discussed in chapter 4, all potential opportunities will be investigated with the assessment of the availability and suitability of urban sites particularly prioritised together with current site options including sites with known long term vacancies, sites where unauthorised caravans<sup>4</sup> camping on authorised sites may be able to acquire planning consent and sites which have the capacity to absorb additional pitches.

**Table D: Primary Site Identification Options (Prioritised Options shaded)**

Site Types	Option Types
New Locations	1.a Potential land within large planned sites including the Ebbsfleet Development Corporation Area
	1.b Publically owned land in the urban area
	1.c Previously developed sites which are now vacant or where the current use is set to cease;
	1.d Greenfield land in the urban area where local or national policy is not a constraint to GTTS development

<sup>4</sup> Omitting any that have been identified as immune.

Current Sites	2.a Long term vacancies
	2.b Unauthorised caravans acquiring planning consent at sites with/without existing planning consent
	2.c Conversion of temporary permitted pitches into pitches with permanent planning consent
	2.d Additional pitches on existing authorised sites
	2.e Small scale extension of sites with planning permission

7.3 If after assessment, the prioritised options above are unable to yield sufficient land to accommodate identified need, then the Council will consider other supply options. Further details of the current stage of option prioritisation and timescales are set out in Table F. It is noted, that as time progresses, remaining options will be reviewed and further prioritised. These newly prioritised options will then be assessed and progressed to ensure a continuing five year supply. Any options that remain un-prioritised will be reviewed and likely to be considered as part of the supporting work to a future Local Plan Review. Initial work on the review is set to begin during Winter 2016/17. In addition further options, not identified in Table F may be considered at that point including;

- the potential of small scale poor quality or previously developed Green Belt sites
- review of the potential for altering Green Belt boundaries through the scheduled Local Plan review process to provide for site extensions or new sites; and
- making formal requests to other local authorities to accommodate remaining need under Duty to Co-operate provisions of the Localism Act.

7.4 However, it is considered that these options are unlikely to be required at this point given the range of options, prioritised (shaded) in table D that will be fully utilised and opportunities maximised to meet need within the Borough.

7.5 The Council has been working collaboratively with other local authorities in Kent and will continue to do so through an officers working group. At this stage it has involved working with consultants to ensure common methodologies to accommodation assessments have been implemented. This will enable higher level assessment and strategy to be developed if required in the future. In addition, the regional level liaison has enabled the planning authorities to share approaches to local planning policy and site identification.

*Initial Assessment of land/ site options*

7.6 As set out in Chapter 2 there are various local and national policy requirements regarding the identification of sites for GTTS and additional policy provisions which inform further factors that should be taken in to account in an assessment. Table E below sets out the factors that have been applied in the some of the option assessments carried out to date, and that will be applied to further site/land option exploration in the future.

**Table E: Site Assessment Considerations**

Consideration	Notes
<b>Planning and other constraints:</b>	
Protection of openness of the Green Belt (CS, PPTS)	<ul style="list-style-type: none"> <li>Is the site in the Green Belt?</li> <li>What are the likely harms e.g. encroachment, visual intrusion etc.</li> </ul>
Suitability of highways access? (DP)	This is likely to be dependent on whether the site will accommodate either travellers or travelling showpeople.
Are there other planning constraints? (CS,PPTS)	<ul style="list-style-type: none"> <li>Flooding, overhead power lines?</li> </ul>
<b>Site Sustainability:</b>	
Accessibility to local services including schools and health facilities, and to public transport. (CS, DP, PTTS)	<ul style="list-style-type: none"> <li>Could services be reached by public transport within 30 mins from the site?</li> <li>Are there bus services no more than 800m from the site and have a frequency of 2 buses per hour?</li> <li>Could primary schools be travelled to on foot?</li> </ul>
Would development make effective use of previously developed, untidy or derelict land? (PTTS)	<ul style="list-style-type: none"> <li>Is the site previously developed in accordance with the definition in Annex 2 of the NPPF?</li> <li>Is it derelict?</li> <li>If in use, is this likely to cease in the short term?</li> <li>Would GTTS development improve an existing untidy land?</li> </ul>
<b>Community:</b>	
Impact of the potential site option on adjacent residential communities (CS, DP, PTTS)	This will consider proximity, residential amenity taking into account existing size and density. Impact of access to the site on existing highways and access by existing residents. Consideration will take into account PPTS preference for not enclosing and reducing openness of sites through hard/soft landscaping.
Impact of surrounding factors on the health and well-being of GTTS households (PTTS)	Are there environmental or human factors that may impact on the health and well- being of site residents e.g. noise, smells?

**Key to table notations:**

- CS Core Strategy (CS20)
- DP Draft Development Policies Plan (DP10)
- PTTS Planning Policy for Traveller Sites

- 7.7 In addition, consideration will be given on how potential capacity can be estimated, in the absence of nationally recognised density measures. The Implementation Strategy in the main combines gypsies and travellers under one definition ‘travellers’ and separately considers travelling showpeople due to the significant differences in their accommodation needs as highlighted by the results of the Dartford GTAA.
- 7.8 In the case of travellers technical estimates are often based on a pitch accommodating a static and tourer caravan, parking and amenity space. Taking this into account approximately 25 pitches could be accommodated on 1 hectare of land. However, it should be noted that the GTAA indicated that the caravan density at Dartford sites was fairly low at about 1.4 caravans per pitch. Therefore based on local evidence, pitch sizes in Dartford may be smaller than previous technical estimates in Dartford. Therefore 25 pitches per hectare is considered appropriate, and provides a generous estimate of a density regard to local traveller pitch requirements.
- 7.9 Once the initial assessment is completed, sites/ land options which are considered suitable will be taken to a second stage of assessment to consider detailed suitability and deliverability. This may involve preliminary engagement with Borough and parish/ town councillors and/ or other relevant parties. Sites that are suitable after this stage will then be taken forward in accordance with the actions identified in table F below. This will take forward earlier engagement that has already taken place with parish/town councils during the preparation process of the Plan, where specific topic areas of importance to the local community were discussed. This has included a meeting with Bean Residents Association and Parish Council regarding the proposed policy approach to traveller site identification set in the Pre – submission consultation Plan.

### **Actions to be taken to Option Assessment**

- 7.10 Table F below identifies the actions to be taken in assessing each site supply option and sets out findings of investigations undertaken thus far. This will be updated in further editions of the Implementation Plan.



**Table F: Detailed actions to be applied in investigating land/sites within each option type**

Site Types	Option Types	Actions	Summary of assessment and outcomes
<b>New Locations</b>	2.a Vacant/ development land in the urban area (public)	<ul style="list-style-type: none"> <li>Establish land availability held by Council and other public bodies, where not earmarked for other uses.</li> <li>Establish suitability of site through site assessment, as set out in Table E above.</li> <li>Consider options for site release for GTTS development with site owner and establish appropriate actions.</li> </ul>	<ul style="list-style-type: none"> <li>Preliminary investigation has revealed that there are a limited number of public land holdings that have not been earmarked for other development proposals or that are considered to have potential suitability for caravan accommodation. Key issues identified during initial assessment are; sloping sites, restricted access and potential impacts on closely located residential areas.</li> <li>1 to 2 sites considered to have some potential and require more detailed assessment of suitability and deliverability; together with informal engagement with local, town and parish councillors.</li> </ul>
	2.b Vacant/ development land in the urban area (private)	<ul style="list-style-type: none"> <li>Identify vacant sites in the urban area and their availability</li> <li>Establish suitability of site through site assessment, as set out in Table E above</li> <li>Consider options for site release for GTTS development with site owner and establish appropriate actions including potential for the Council to acquire land</li> </ul>	<ul style="list-style-type: none"> <li>A number of potential sites have been identified through Business Rate records and GIS vacancy data held by the Council.</li> <li>A preliminary assessment of constraints, including a high level assessment of access potential, together with a review of size of sites; enabled the list of potential sites to be reduced where overriding constraints and/or size indicated no or extremely limited potential for delivery</li> <li>Several sites have emerged as having some potential and these are now being taken through a more detailed assessment of suitability using Table E considerations and exploration of availability.</li> </ul>
	2.c Potential land within the Ebbsfleet Development Corporation (EDC) Area	<ul style="list-style-type: none"> <li>Continue to collaborate with EDC regarding provision – particularly considering information arising from the forthcoming masterplan/ SPD</li> </ul>	<ul style="list-style-type: none"> <li>The Council has written a formal officer letter regarding joint working on traveller accommodation to the EDC. The letter highlights the discussion on this matter within the House of Lords and that the EDC Chairman has been quoted as stating that the Corporation will look into the matter. The letter is shown in Appendix 1.</li> <li>A response has recently been received from the interim chief</li> </ul>

			<p>executive of the EDC. The response highlights constraints to identification of suitable land within the EDC area particularly taking into account the remit by Government to deliver up to 15,000 homes in the garden city and subsequent pressure on developable land. However the letter states that the EDC will continue to engage with the Council on the matter and it is envisaged that this is likely to take place during the preparation stages of the programmed Local Plan review.</p>
<b>Current Sites</b>	1.a Long term vacancies	<ul style="list-style-type: none"> <li>• Establish suitability of site through site assessment, as set out in Table E above</li> <li>• Establish reasons for vacancy</li> <li>• Ascertain ownership of site and future intentions for vacant pitches</li> <li>• Review requirements of planning consent</li> <li>• If site suitable in cooperation with owner, establish an action plan to enable the pitches to be made available to accommodate traveller need</li> <li>• Where required facilitate revised planning application with site owner</li> </ul>	<ul style="list-style-type: none"> <li>• Two gypsy and traveller sites have been identified as containing long term vacancies and have undergone site Table 7 considerations assessment which has concluded that the sites are suitable for future caravan accommodation in principle.</li> <li>• The Council will liaise with site owners regarding intentions and other parties identified within the stage approach to more fully ascertain deliverability potential.</li> <li>• Historic caravan counts, together with liaison with the site owner of the Travelling Showmans site, indicate that the site has potential capacity for additional plots. The Council will continue to liaise with the site owner/operator.</li> </ul>
	1.b Unauthorised caravans at sites with/ without existing planning consent	<ul style="list-style-type: none"> <li>• Establish reasons for unauthorised camping and site owners' long term aspirations.</li> <li>• Establish suitability of site through site assessment, as set out in Table E above</li> <li>• If suitable, where required, facilitate submission of a planning</li> </ul>	<ul style="list-style-type: none"> <li>• Initial investigation of suitability sites with planning consent but where unauthorised camping is currently taking place is underway. In liaison with the site owners the reasons for non-regularisation will be established.</li> <li>• Sites considered to have potential to be suitable for regularisation will be taken through to a stage 2 assessment incorporating more detailed assessment and engagement with owners, residents and other stakeholders.</li> </ul>

		application for development	
	1.c Conversion of temporary permitted pitches into pitches with permanent planning consent.	<ul style="list-style-type: none"> <li>Establish suitability of site through site assessment, as set out in Table E above</li> <li>review the potential for permanent permission</li> <li>If potential for permanent consent, engage with site owners and where required support submission of new planning application.</li> </ul>	<ul style="list-style-type: none"> <li>Not a priority option - not currently explored.</li> </ul>
	1.d Additional pitches on existing sites	<ul style="list-style-type: none"> <li>Establish suitability of site through site assessment, as set out in Table E above</li> <li>Where suitable engage with site owner regarding willingness to provide additional pitches.</li> <li>Where appropriate, offer guidance on submission of planning application.</li> </ul>	<ul style="list-style-type: none"> <li>In undertaking initial assessment of sites in workstream 1b above consideration is also being given to whether there is capacity at the sites to accommodate additional pitches.</li> <li>Exploration of additional pitches at other sites not incorporated in 1b has not been taken forward as a priority action at this stage.</li> </ul>
	1.e Small scale extension of the sites with planning permission.	<ul style="list-style-type: none"> <li>Establish suitability of site through site assessment, as set out in Table E above including land where extension would take place</li> <li>Review potential for planning consent</li> <li>Where suitable engage with land owner regarding their future willingness to extend their site</li> <li>Provide support, where required, to the site owner to submit planning application</li> </ul>	<ul style="list-style-type: none"> <li>Not a priority option - not currently explored</li> </ul>

## 8 Addressing transit need

- 8.1 Taking into account the location of Dartford at the intersection of two key highways in the national strategic road network and on the borders of Greater London together with the Borough being a gateway to the M25 Thames crossing, the Borough has historically experienced varying annual levels of unauthorised encampments. Anecdotal evidence from officers dealing with residents at the encampments suggests that in the main, they comprise of people who permanently undertake a transitory lifestyle and are not seeking permanent accommodation in Dartford or elsewhere.
- 8.2 The GTAA indicates that the presence of unauthorised encampments suggests an unmet need for transit provision but assessing requirements is very complex. There is a need to consider longitudinal and regional data to more fully consider provision of a network of transit facilities across the region. The GTAA suggests transit need may be met through a variety of approaches such as incorporating transit provision into existing traveller sites, and new transit provision within new sites. The new PTTS also indicates that due to the planning definition of GTTS, accommodation needs for travelling lifestyles will be more fully explored. This assessment may result in the identification of a greater need for transit pitches and a reduction in a need for permanent pitch provision. The Council will undertake a number of actions to ascertain and identify future requirements. These include:
- Determining levels of transit provision within existing sites through ongoing engagement with site owners. Local evidence suggests that a number of sites provide short term accommodation.
  - Working with the County Council and other local authorities in Kent to identify regional travelling and to identify a network of site provision. This is likely to take forward existing Kent wide cooperation regarding unauthorised encampments which is already established.
  - Identification of transit(s) sites in Dartford will consider new location options as set out above.

## 9 Summary and Next Steps

- 9.1 This document, as a draft GTTS implementation strategy, provides an overview of traveller and travelling showpeople identified need, supported through an existing Assessment. In the

current policy context there is confidence that traveller needs, as now defined through national policy, are not under quantified and will be fully addressed.

- 9.2 This can enable plan-making to proceed. The progress in establishing a five year supply, that has good certainty and feasibility to be delivered, has been outlined. In any event at this juncture 14 pitches and 2 travelling showpeople plots with permission are considered to provide supply to meet current need given requirements under current national policy.
- 9.3 The approach to being taken by the Council to ensure the identification of land and sites over the future timescale to meet traveller need will in addition provide for demand by those local traveller households, who may not meet the prescribed planning definition, but have a preference to reside in caravans. A deliverable supply of land/ sites to meet five year requirements is being progressed. Further feasible options are being pro-actively explored (In addition to identifying a deliverable supply of land to meet forecast need over the next five years, other 'buffer' sites/ land will be identified in order that progress can be made if delays to delivery were to occur). The potential to identify sufficient land/ site is underpinned through the findings of the option work streams set out in Table F above.
- 9.4 The Implementation Strategy provides an approach to ensuring delivery of suitable land, taking into account the Government's aim to protect Green Belt from inappropriate development whilst considering local circumstances and differences in approach to accessing suitable accommodation by GTTS communities over settled communities. In addition, the Strategy responds to planned general housing and economic growth in the Borough, which influences land availability. Whilst at the same time, it addresses the protection of local amenity and environment and increasing the number of traveller sites in appropriate sustainable locations.
- 9.5 The approach seeks to address the concerns and preferences of both settled and GTTS communities and the promotion of private sites. Lastly, the options identified will contribute to reducing unauthorised developments and encampments. Therefore the Implementation Strategy supports the key aims expressed in the PTTS.
- 9.6 The current outcomes of further work and actions are set out above (Chapters 7 to 8), and any resulting provisions, including relevant engagement and consultation with

stakeholders, GTTS and the settled community, will continue to be set out in an updated Implementation Strategy. This will be re-published periodically and continue to inform plan-making. In particular, actions including taking forward the longer term options set out in paragraph 7.3 will be used to ensure an ongoing 5 year supply of land to accommodate identified GTTS need in the Borough.

9.7 Overall future potential implementation measures are featured in Table F. It is appropriate to highlight next steps, key actions in this respect are set out in Table G below:

**Table G: Key Actions and Next Steps**

Action	Timetable
1.Determine and approve the submitted site layout and drainage plan conditions discharge application at Knoxfield Caravan Site (13 pitches)	<b>By July 2016</b>
2.Liaise with applicable site owners of existing sites (as per action 1b and d table F) to consider potential for regularisation of unauthorised camping (omitting immune pitches) and where appropriate increasing pitch numbers within the site.	<b>Summer 2016</b>
10 Continue to liaise with owner/ operator of travelling showpeople site at Darent Wood Road regarding availability of additional plot capacity.	<b>Ongoing</b>
4.Investigate availability and delivery mechanisms together with more detailed planning assessment at the publically owned land identified as having some potential for traveller sites	<b>Summer 2016</b>
6.Undertake detailed suitability assessment and determine availability/ deliverability of private sites identified as having some potential for traveller sites	<b>Winter 2016 onwards</b> The exact timing of this work will be dependent on the availability of pitches to accommodate need revealed through the actions above.

9.8 The Five year supply will be updated on an at least annual basis and delivery of pitches will be reported in the Council’s Planning Authority Monitoring Report (AMR). This, and commissioning further evidence of need, is expected to inform a review of the approach and Strategy delivery in the next Local Plan (commencing winter 2016/17).

## **Appendix 1: Workstream 2C Table F: Dartford Borough Council letter to Ebbsfleet Development Corporation<sup>5</sup>**

Your Ref: EDCGTsApr16

Date: 21 April 2016

Dear Simon and Tracey

Re: Gypsy, Traveller, Travelling Showpeople (GTTS) Accommodation

As previously indicated to the EDC, including as mentioned in our discussion in December 2015, am writing on this matter to explore options for shared working. The Borough Council, responsible for Local Plan production in the Borough including within the EDC area, is taking forward its obligations for investigating site identification.

The Council outlined its current proposed approach and next steps in the Daft Implementation Strategy evidence base supporting its Development Policies Plan document ([www.dartford.gov.uk/\\_data/assets/pdf\\_file/0007/217555/Updated-Published-Implementation-Strategy-Feb-16.pdf](http://www.dartford.gov.uk/_data/assets/pdf_file/0007/217555/Updated-Published-Implementation-Strategy-Feb-16.pdf)). This notes a range of actions, including communications with external organisations and examining the urban part of the Borough (which incorporates the EDC area). See paragraphs 4.2 and 4.4 inter alia. This research will inform, in particular, the maintenance of 5-year supply of GTTS sites.

Dartford Borough Council officers consider it reasonable to ask you to help support this approach, and would welcome further discussion of the issues arising as appropriate. This could include aiming for your masterplanning / information gathering to at least recognise the principle of the need to make appropriate site provision within the Borough, and the fact that Ebbsfleet accounts for over a quarter of the non-green belt Borough. It is expected research could explore the areas of general development “flex” you have identified, or land parcels that are not the current focus of your efforts but which may be sufficiently free from constraints/ committed uses.

I would highlight the role of major national-scale development (such as Garden Cities) in making a proportionate contribution to meeting GTTS needs has been raised in the House of Lords. Furthermore, I note it was reported that as a result, Michael Cassidy was quoted as saying he would “look into it” (<http://travellerstimes.org.uk/News/Sites-House-of-Lords->

---

<sup>5</sup> Personal contact details have been removed from the copy letter

[hears-of-better-way-forward.aspx](#)). I would be grateful to be informed if any progress that has been able to be made in this respect.

To confirm, it is our intention to proceed further with GTTS site identification in the Borough. As set out in the Draft Implementation Strategy, we are prioritising looking at opportunities and constraints in the urban part of Dartford. This includes Ebbsfleet. Depending on site specific circumstances, and planning history, it is proposed suitable sites will not necessarily be excluded on availability or broad suitability grounds solely due a location within the EDC. However, as in the case for all development land supply studies, the full range of key factors will be considered. The deliverability of 'suitable land' will require later assessment of other factors such as viability and timescales for achieving delivery.

I hope you can take this into account in your ongoing work, and can collaborate to investigate site options and deliverability factors. In future - in adherence to our proposed strategy – this may also have to include the Green Belt part of the EDC, if urban options are exhausted.

I look forward to further discussions in future, and we will keep you apprised of the progress in relation to our additional evidence gathering.

Yours sincerely,

Mark.

*MJ Aplin*

Mark Aplin  
Planning Policy Manager  
Dartford Borough Council.

## **Appendix 2: Workstream 2C Table F: Letter from Ebbsfleet Development Corporation to Dartford Borough Council<sup>6</sup>**

Mark Aplin  
Planning Policy Manager  
Dartford Borough Council

2 June 2016

Dear Mark,

### **Gypsy, Traveller and Travelling Showpeople (GTTS) Sites**

Thank you for your letter of 21 April 2016.

I am aware of Dartford Borough Council's responsibility to assess and establish an evidence base in respect of GTTS need within the Borough and to identify a rolling supply of deliverable sites as part of its plan making process.

I note that you are seeking EDC's support in respect of the above. However, you will appreciate that firstly, the responsibility in assessing need and identifying a five year supply of deliverable sites rests with DBC.

Secondly, EDC, as a statutory development corporation, has had a very specific remit placed upon it by Government – to deliver up to 15,000 homes of sufficient quality and at pace within Ebbsfleet. Our organisation is therefore geared towards fulfilling this very particular function.

Thirdly, given EDC's stated purpose and the designation of Ebbsfleet as a regeneration area (through the delivery of a new Garden City) there is already considerable pressure on the developable areas within Ebbsfleet in terms of accommodating the requisite housing growth and achieving its stated aims and purpose. As such, it appears to me that Ebbsfleet's capacity to accommodate further development in the form of GTTS sites will be limited at best.

In view of the above factors, the unfortunate reality is that EDC has insufficient scope and resource to be able to assist DBC with this endeavour in any meaningful way.

---

<sup>6</sup> Personal contact details have been removed from the copy letter

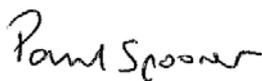
Notwithstanding the above, no doubt DBC will seek to engage with EDC as a key stakeholder when undertaking its needs and allocation exercises, and in this respect, EDC will of course provide such representations as appropriate.

With respect to some of the other points raised in your letter:

- The comments attributed to Michael Cassidy were, I believe, in relation to a suggestion by Lord Avebury that the statutes of development corporations could have built into them, an obligation for new towns to provide 1% of the homes in the form of caravan sites for travellers. There is no such obligation within the statutory instrument which established EDC and, as far as I am aware, no other legislation which imposes such a requirement on Ebbsfleet.
- We would expect that DBC, in any exploration of potential GTTS sites within Ebbsfleet, to have material regard to the fact that the area has been designated as a regeneration area for the provision of up to 15,000 new houses.
- I note your suggestion about the potential use of Green Belt land within Ebbsfleet for GTTS purposes but would just point out that national policy relating to Green Belt preservation would obviously be a material consideration in this regard, including *Policy E: Traveller Sites in Green Belt* of DCLG's Planning Policy for Traveller Sites.

I trust the above is helpful in clarifying EDC's position though I appreciate it will not necessarily be the response that you will have been seeking. Please do get in touch if you would like to discuss with me further.

Yours sincerely



**Paul Spooner**  
Interim CEO

[www.ebbsfleetdc.org](http://www.ebbsfleetdc.org)