

DARTFORD LOCAL PLAN

**Meeting the Needs of
Gypsies, Travellers and
Travelling Showpeople
Report**

September 2021

DARTFORD
BOROUGH COUNCIL

Contents

1	INTRODUCTION.....	4
	Purpose of Report.....	4
2	PLANNING POLICY.....	5
	Planning Policy for Traveller Sites.....	5
	Local Plan.....	5
3	CURRENT SITUATION IN DARTFORD BOROUGH.....	7
	Needs: Amounts and Planning Applications.....	7
	Needs: Locations.....	9
4	MEETING NEEDS.....	12
	Existing Sites.....	12
	New Sites – Local Plan Allocations, Areas with Development Potential and Ebbsfleet Garden City.....	13
	New Sites – Council Owned Land.....	15
5	CONCLUSIONS.....	17
	APPENDIX A: Definitions.....	19
	APPENDIX B: Policies Map Excerpts.....	20
	Salinas, Darenth Wood Road.....	20
	Tennis Courts, Sutton at Hone.....	20
	APPENDIX C: Council request to Ebbsfleet Development Corporation and Response....	21
	Letter from Dartford Borough Council to Ebbsfleet Development Corporation.....	21
	Response from Ebbsfleet Development Corporation to Dartford Borough Council.....	25

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1 INTRODUCTION

Purpose of Report

- 1.1 This report considers the needs arising over the plan period for gypsies and travellers (known as travellers for the remainder of this paper) and travelling showpeople who meet the planning definition (see Appendix A). It sets out how these needs are being addressed through the Dartford Local Plan, with a particular emphasis on providing a five year supply.
- 1.2 Section 2 sets out relevant national and local planning policies. Section 3 outlines the current situation in Dartford Borough in terms of the amount of traveller pitches and travelling showpeople's plots needed and the sites where these needs are arising in the first five years. The approach that the Council is taking towards meeting five year needs by the use of existing sites and exploring the potential for new sites is set out in section 4. Finally, section 5 outlines the conclusions and approach going forward.

2 PLANNING POLICY

Planning Policy for Traveller Sites

- 2.1 National Planning Policy for the provision of traveller and travelling showpeople sites is contained in the Planning Policy for Traveller Sites 2015 (PPTS) by the Department for Communities and Local Government. The PPTS includes definitions for gypsies and travellers (known as travellers for the remainder of this paper) and travelling showpeople and these are repeated in Appendix A of this paper. Paragraph 9 of the PPTS requires local planning authorities to set out pitch targets for travellers and plot targets for travelling showpeople who meet the definition which address the likely permanent and transit site accommodation needs of those in the area, working collaboratively with neighbouring local planning authorities.
- 2.2 Paragraph 10 of the PPTS requires local planning authorities, in producing their Local Plans, to:
- a) Identify and update annually, a supply of specific deliverable* sites sufficient to provide 5 years' worth of sites against their locally set targets
 - b) Identify a supply of specific developable^ sites, or broad locations for growth, for years 6-10 and, where possible, for years 11-15
 - c) Consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area
 - d) Relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surround population's size and density
 - e) Protect local amenity and environment
- * To be considered deliverable, sites should be available now, offer a suitable location for development, and be achievable with a realistic prospect that development will be delivered on the site within five years.
- ^ To be considered developable, sites should be in a suitable location for traveller site development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.
- 2.3 The PPTS states that sites for travellers and travelling showpeople are inappropriate development in the Green Belt (paragraph 16). It further specifies, in paragraph 17, that Green Belt boundaries should only be altered in exceptional circumstances. If a local planning authority wishes to make an exceptional, limited alteration to the defined Green Belt boundary to meet a specific, identified need for a site, it should only do so through the plan making process. If land is removed from the Green Belt in this way, it should be specifically allocated in the plan as a traveller/travelling showpeople's site only.

Local Plan

- 2.4 Dartford Borough has an established, demonstrated approach of plan-led growth to accommodate development needs. This positive, active planning method of identifying clear sustainable locations to accommodate development is reflected in the proposed

strategy set out in the Pre-Submission Local Plan September 2021, which takes account of national policy, including in relation to the Green Belt. To this end, Dartford Borough started research and policy formulation early in the plan process. This resulted in the Local Plan Preferred Options document setting out a clear picture of needs and key principles to ensure that need is accommodated. Further work has occurred to provide a more detailed approach, and aims to maximise delivery prospects.

2.5 The Pre-Submission Local Plan September 2021 sets out the policy for Gypsy, Traveller and Travelling Showpeople Accommodation (policy M12). This is replicated below. The following sections of this paper set out the background to these needs and the work which is ongoing to meet the Five Year Supply.

1. Dartford will meet needs and maintain a Five Year Supply, with deliverable land to meet identified requirements for 34 gypsy and traveller pitches and 1 travelling showpeople plot. This will occur through a range of actions including:
 - a) Realising the potential for additional accommodation within existing authorised and tolerated sites, where needs arise;
 - b) Allocating land for additional pitches at: Tennis Courts Sutton at Hone and Salinas Darenth Wood Road;
 - c) Actively seeking to identify deliverable non Green Belt sites within Ebbsfleet Garden City; and
 - d) Determining planning applications expeditiously in line with national policy and the development management criteria set out in criterion 2 below.
2. Planning applications for gypsy and traveller pitches and travelling showpeople plots will be assessed against relevant local and national policy requirements. Proposals located in the Green Belt will be determined in accordance with the balancing exercise set out in national policy, taking into account impacts on the openness and purposes of the Green Belt, and having regard to relevant material considerations. All proposals must demonstrate that the site:
 - a) Is of a scale to accommodate and has the potential to provide the facilities required for future occupants in terms of amenity and in meeting site licensing requirements;
 - b) Is of a scale appropriate to the ability of the surrounding community to accommodate the development without significant detriment to neighbouring residential amenity, taking account of existing population size and density;
 - c) Is not in an area liable to flooding; and suitable drainage can be installed that does not lead to unacceptable risks to groundwater and/or localised flooding
 - d) Is located reasonably close to a range of services and facilities;
 - e) Has the ability to provide appropriate safe vehicular access to the site and provides suitable parking and amenity areas; and
 - f) Is screened and visually integrated into the local and wider landscape, with careful siting within the site (including of any day rooms).

2.6 Pre-Submission Local Plan policy E1 (Ebbsfleet and Swanscombe Strategy) criterion 6 sets out the following requirement:

- 6) Opportunities for providing pitches or plots for gypsies, travellers and travelling showpeople within Ebbsfleet Garden City will be actively explored to help meet the needs of the Borough.

3 CURRENT SITUATION IN DARTFORD BOROUGH

Needs: Amounts and Planning Applications

3.1 A Dartford Gypsy and Traveller Accommodation Assessment (GTAA) was carried out and completed by consultants on behalf of the Council in October 2019. This included surveys of gypsies and travellers (referred to as travellers throughout the remainder of this paper) and travelling showpeople living in the Borough in May 2019 to determine current and future needs. The consultants acted to engage with and interview residents on all occupied traveller pitches and travelling showpeople plots. The full methodology used is set out in section 3 of the GTAA. Paragraph 8.2 of the GTAA indicates that there was a very high response rate of 90%. For this reason, the GTAA is considered to be robust and up to date, and an accurate reflection of housing need for travellers and travelling showpeople in the Borough.

3.2 For those who meet the definition set out in the PPTS (Appendix A), the GTAA found the following needs for traveller pitches over the period 2019-2035.

Years	0-5	6-10	11-15	16	Total
	2019-24	2024-29	2029-34	2035	
	48	9	11	2	70

Source: Figure 2 of the GTAA

3.3 However, the figures date from 2019 and the following uses data from the above table to update the five year and subsequent needs as at 2021.

Years	5 year supply period	Years 6-10	11-14	Total
	2019-26	2026-31	2031-35	
	52	9	9	70

3.4 In terms of travelling showpeople who meet the PPTS definition set out in Appendix A, the GTAA found the following needs for travelling showpeople plots over the period 2019-2035.

Years	0-5	6-10	11-15	16	Total
	2019	2024-29	2029-34	2035	
	1	0	0	0	1

Source: Figure 4 of the GTAA

3.5 The following uses data from the above table to update the five year and subsequent needs as at 2021.

Years	5 year supply period	6-10	11-15	Total
	2019-2026	2026-31	2031-35	
	1	0	0	1

3.6 The GTAA found no needs for transit site provision.

3.7 Since the GTAA was carried out, the Council has granted the following planning permissions for intensification of or extensions to existing authorised sites which would result in a net gain of 11 permanent traveller pitches. Occupants of all these sites were

interviewed as part of the GTAA survey. It is assumed that these have already been implemented or will be implemented in the near future.

Site	Description, Ref and Decision Date	Net Gain
48 Brakefield Road, Southfleet	Change of use of land adjacent to existing Gypsy site for stationing of 2 additional mobile homes, 1 dayroom and permanent permission for 1 No. mobile home as approved under DA/13/01620/FUL (part retrospective) 19/00605/COU – Approved on 13/02/2020	3
Cob Tree Farm, Darenth Hill	Extension of existing gypsy site for the provision of 3 gypsy pitches each comprising the stationing of 1 No. static caravan, 1 No. touring caravan and the erection of 1 No. day room with associated parking, fencing and landscaping 18/01658/COU – Approved on 07/11/2019	3
Hillside Farm, Darenth Hill	Gypsy and Travellers caravan site for 11 pitches (including existing site managers accommodation) and change of use of part of area to associated children's play/amenity area 18/01652/FUL – Approved on 08/08/2019	5
Hillside Farm, Darenth Hill	Extension to existing gypsy/traveller site to provide an additional 6 pitches, comprising the siting of 1 no. mobile home and 1 no. touring caravan per pitch, as well as associated car parking, hard surfacing and landscaping 20/01290/COU – Approved on 16/04/2021	6
The Stables, Station Road, Sutton at Hone	Use of land for stationing of a static caravan for a gypsy family (retrospective application) (removal or variation of condition 1 of DA/12/00574/FUL). 20/00768/RCON – Approved on 12/05/2021	1
Total		18

- 3.8 There were also the following planning applications for traveller pitches which were refused but are currently subject to appeals.

Site	Description, Ref and Decision Date	Notes
Eebs Stables, Trollingdown Hill	Provision of 3 mobile homes, partial conversion of existing stables as a utility room, and ancillary hard standing and parking provision (part retrospective) 19/00102/FUL – Refused on 10/04/2019 Further repeat application 21/00648/FUL – Refused on 22/06/2021	Existing unauthorised site. Applicants were living on the site at the time of the GTAA survey. Also subject to an enforcement appeal.
Eagle Farm, High Road, Wilmington	Change of use of land to a gypsy and traveller site to accommodate	Applicants currently occupy an existing

Site	Description, Ref and Decision Date	Notes
	4 x two bed static homes, new access road and parking 19/01233/COU – Refused on 06/05/2020	lawful site in Sevenoaks District.

- 3.9 There is one current planning application for traveller pitches which has not yet been determined.

Site	Description and Ref	Notes
Eagle Farm, High Road, Wilmington	Change of use of land to travellers caravan site consisting of 4 pitches each containing 1 residential mobile home and associated development, and construction of a new access road. 21/01107/COU – pending consideration	Repeat of application 19/01233/COU previously refused – see above table.

- 3.10 The following planning application for a travelling showpeople site was refused but is currently subject to an appeal.

Site	Description, Ref and Decision Date	Notes
Drudgeon Farm, School Lane, Bean	Change of use of land to form 4 permanent plots for travelling showpeople with associated access and landscaping 19/01262/COU – Refused 23/06/2020	Existing unauthorised site. Applicants were not living in the Borough at the time of the GTAA survey. Also subject to an enforcement appeal.

- 3.11 The 5 year (2019-2024) need identified in the GTAA was for 48 traveller pitches and 1 travelling showpeople's plot, but taking account of the 2021 date of the Pre-Submission Local Plan, the figures of need to 2026 are now 52 traveller pitches and 1 travelling showpeople's plot. As paragraph 3.7 indicates, planning permission has since been granted for 18 traveller pitches. This reduces the 5 year need figure to 2026 to 34 traveller pitches and 1 travelling showpeople's plot. It should be noted that there are a number of current appeals and planning applications, the decisions on which could affect some of these figures.

Needs: Locations

- 3.12 The GTAA survey indicated that there are current and 5 year pitch needs arising from a number of existing traveller and travelling showpeople's sites within the Borough. The current needs arise as a result of households on unauthorised developments and concealed or doubled up households. The needs within the next 5 years arise due to teenage children who will need of a pitch of their own. There are also needs arising from pitches with temporary permission. It should be noted that all traveller and travelling showpeople's sites within the Borough are located in the Green Belt.

- 3.13 Paragraph 1.13 of the GTAA recognises that a number of sites in Dartford Borough are occupied by extended family groups and are not sub-divided into individual pitches. As such, in the short to medium term, it is likely that the accommodation needs of concealed or doubled-up adults and teenagers who will be in need of a pitch of their own in the next 5 years could be met through additional touring caravans or shared static caravans, tourers and dayrooms on existing sites. These would generally be equivalent to providing pitches, even if they are not formally set out as such.
- 3.14 Taking account of the planning permissions granted since the GTAA was carried out which are assumed to have been implemented or will soon be implemented (set out in paragraph 3.7), there are known current and 5 year needs for traveller pitches arising from the sites set out in the table below. There will also be needs for an additional 4 pitches arising in the 2024-2026 period but it is not known from which sites these needs arise.

Site	Current Need	5 Year Need
48 Brakefield Road, Southfleet	0	1
Castle Farm, Green Street Green Road	1	6
Eebs Stables, Trollingdown Hill ¹	5	0
Green Bungalow ²	2	0
Hillside Farm, Darenth Hill	0	9
Knoxfield Plot 3, Darenth Wood Road	0	1
Salinas, Darenth Wood Road	2	1
Tennis Courts, Main Road, Sutton at Hone	0	2
Total	10	20

¹ Subject to a current appeal for 3 pitches

² No planning history as a traveller site and it is understood that the existing caravan on the site is being used ancillary to the existing house. Further work is required to understand if there is a genuine traveller need arising from this site.

- 3.15 There are current and 5 year needs for travelling showpeople's plots from the following site.

Site	Current Need	5 Year Need
Forest Amusements, Darenth Wood Road	0	1
Total	0	1

4 MEETING NEEDS

Existing Sites

- 4.1 Many of the sites from which traveller and travelling showpeople's needs arise are unauthorised, occupied by extended family groups which contain concealed or doubled-up adults, and/or occupied teenagers (see paragraph 3.12). In view of this, it is considered that some needs are most likely to be met by providing additional caravans within (intensification) or extending existing authorised and tolerated sites (see paragraphs 2.5 and 3.13). It is considered that these are exceptional circumstances which justify a limited alteration to the Green Belt boundary in accordance with the PPTS (see paragraph 2.3).
- 4.2 In January 2020, the Council wrote letters to the owners of the authorised and lawful gypsy, traveller and travelling showpeople's sites in the Borough in cases where it was considered that additional caravans could be provided and/or where there were outstanding planning permissions for the provision of additional caravans. There were identified needs arising between 2019 and 2024 on all except one of these sites. The letters advised of the Local Plan Preferred Options consultation, invited responses on the consultation and invited informal discussion on how sites could be used to meet needs/ plans for implementation of the planning permissions.
- 4.3 In response to the Local Plan consultation, the owner of the Hillside Farm site indicated that this site would be appropriate for additional gypsy and traveller pitches. There were also some informal conversations which indicated that:
- the planning permission for three additional gypsy and traveller pitches at Cob Tree Farm, Darenth Hill would be implemented;
 - there was space and a willingness to accommodate additional gypsy and traveller pitches at Salinas, Darenth Wood Road; and
 - there was space and a willingness to accommodate an additional travelling showpeople's plot at Forest Amusements, Darenth Wood Road.
- 4.4 Further work is currently underway on carrying out site assessments, liaising with the occupiers and drawing up plans for sites where there are known needs arising and which could potentially accommodate additional caravans. However, this has been significantly hampered by Covid-19 related tier and national lockdown restrictions which have made it impossible to visit the sites, liaise with occupiers on site and draw up plans to date. Now that the lockdown restrictions have been removed, it is intended that this work will progress.
- 4.5 An initial desktop assessment has indicated that the following authorised or tolerated traveller sites could accommodate additional caravans in a satisfactory way but, until there has been contact with the occupiers and plans are drawn up, it is not yet possible to determine how many additional pitches they could accommodate.

Site	Current and 5 Year Need	Notes
Knoxfield Plot 3, Darenth Wood Road	1	Within existing authorised site, site history means that planning permission is not needed, no need for a Local Plan allocation
Salinas, Darenth Wood Road	3	Within and as an extension to existing tolerated site, planning permission

Site	Current and 5 Year Need	Notes
		needed for extension, site proposed for Local Plan allocation
Tennis Courts, Main Road, Sutton at Hone	2	Within existing authorised site, planning permission needed, site proposed for Local Plan allocation

4.6 The sites set out in paragraph 4.5 would go part of the way to meeting current and 5 year traveller needs outlined in paragraph 3.14. Salinas and Tennis Courts are identified in policy M12 of the Pre-Submission Local Plan (see paragraph 2.5) and identified on the Policies Map (see Appendix B). There may be opportunities to accommodate some additional pitches to meet needs on other sites but this is dependent on ongoing site work which has previously been hampered by restrictions associated with Covid-19 but is now able to progress (see paragraph 4.4).

4.7 However, it is likely that some significant needs would remain. This is particularly from the larger sites at Castle Farm and Hillside Farm, and from the unauthorised site at Eebs Stables:

- The proposed Eebs Stables site was refused on the basis that it was inappropriate development within the Green Belt and there was an absence of very special circumstances, and it was providing residential accommodation in an unsustainable location. As referred to in paragraph 3.8, the Eebs Stables site is currently subject to planning and enforcement appeals.

4.8 In terms of travelling showpeople, an initial desktop assessment has indicated that the existing authorised site could accommodate an additional caravan in a satisfactory way but there will need to be contact with the occupiers and a plan drawn up to show how this can be done.

Site	Current and 5 Year Need	Notes
Forest Amusements, Darenth Wood Road	1	Within existing authorised site, site history means that planning permission is not needed, no need for a Local Plan allocation

New Sites – Local Plan Allocations, Areas with Development Potential and Ebbsfleet Garden City

4.9 The Council is considering the potential for new sites to accommodate some of the current, five year and longer term needs for travellers. Given national policy on the Green Belt, it is important that non Green Belt sites are considered before Green Belt ones. The provision of traveller pitches on strategic sites is an accepted method of meeting needs. The Pre-Submission Local Plan September 2021 identifies a number of strategic site allocations and areas with potential for future development which are set out in the table below.

Site or Area	Policy	Strategic Growth Points
Westgate Allocation	D4	Central Dartford
East of Lowfield Street Allocation	D5	Central Dartford

Site or Area	Policy	Strategic Growth Points
Priory Centre Allocation	D6	Central Dartford
Station Surround/ River Darent Area	D7	Central Dartford
Ebbsfleet Central Allocation	E4	Ebbsfleet Garden City
Alkerden and Ashmere Allocation	E5	Ebbsfleet Garden City
Land North of London Road, Swanscombe	E6	Ebbsfleet Garden City

- 4.10 The sites and areas in Central Dartford are unsuitable for traveller sites given the risk of flooding, the scale and nature of development in that location, and the heritage value of much of the area. The Council has carried out some initial, high level assessments of sites within Ebbsfleet Garden City which were considered within the Strategic Housing Land Availability Assessment. These are outlined in the table below.

Site	Assessment Outcome
Ebbsfleet Central Allocation	Potentially suitable and available if considered as part of, and integrated within, wider proposals for the development of the site
Ebbsfleet Green	Permission for residential development is being implemented. No opportunity for a traveller site.
Alkerden and Ashmere Allocation	Permission for residential development is being implemented. No opportunity for a traveller site.
Castle Hill	Permission for residential development is being implemented. No opportunity for a traveller site.
Bean Triangle	Disqualified – within the Green Belt
Disused Pit South Of London Road And East Of Craylands Lane (The Tank), Swanscombe	Disqualified – within the notified Swanscombe Peninsula Site of Special Scientific Interest but also unavailable as it is affected by the proposals for the London Resort.
Land East of Stanhope Road adjacent Railway (part of Bamber Pit), Swanscombe	Disqualified – within the notified Swanscombe Peninsula Site of Special Scientific Interest but also unavailable as it is affected by the proposals for the London Resort.
Area North of London Road, Swanscombe	Unsuitable due to flood risk but also unavailable and affected by the proposals for the London Resort

- 4.11 In terms of the Local Plan development sites, only Ebbsfleet Central is potentially suitable and available for the provision of a traveller site. It is a strategic site which is currently subject to detailed masterplanning work and the Council considers that a traveller site could be incorporated within the development. This possible use is not specifically referred to Pre-Submission Local Plan policy E4 (Ebbsfleet Central Allocation) given that this policy focuses on the central layout principles and most major uses in this large scale development. However, policy E1 (Ebbsfleet and Swanscombe Strategy) states that opportunities for providing pitches or plots for gypsies, travellers and travelling showpeople within Ebbsfleet Garden City will be actively explored to help meet the needs of the Borough (see paragraph 2.6).
- 4.12 Policy E1 applies across the Ebbsfleet Garden City area, and it includes land not specifically identified in the Plan for development. Therefore, there may be additional land opportunities not currently identified that could contribute to meeting needs that, in the absence of alternative development proposals, may prove deliverable. It is

recognised that the recently notified Swanscombe Peninsula Site of Special Scientific Interest will impact on the land which could be suitable for gypsies, travellers and travelling showpeople. In addition, the proposals for the London Resort also currently affect the availability of land for this purpose.

- 4.13 The Council informed the Ebbsfleet Development Corporation (EDC) shortly after its inception in 2015 that it was interested in exploring land options to meet traveller needs at Ebbsfleet. Ebbsfleet was highlighted as a potential location in the Local Plan Preferred Options consultation document in January 2020.
- 4.14 In December 2020, the Council wrote to the EDC again, making a formal request to incorporate the requirement for traveller pitches within its masterplanning work for the Ebbsfleet Central site. The EDC responded in June 2021. Both the Council's request letter and the EDC's response are included in Appendix C.
- 4.15 EDC's response in June 2021 indicated the background to work taking place on bringing forward the Ebbsfleet Central site for development. In relation to Ebbsfleet Central, it concluded that:

"Due to the land requirements for gypsy and traveller pitches, which would provide low density development that makes inefficient use of land, such provision in this location would not be appropriate in urban design terms as it would be incompatible with the creation of a high density urban development.

Accordingly, to support realisation of the vision, whilst seeking to incorporate various housing typologies and tenures to meet different needs, the initial master planning work for Ebbsfleet Central, as presented to Borough Council officers in February 2021, does not include provision for gypsy and traveller accommodation. Furthermore, for the reasons stated above it is not the intention of EDC to seek to incorporate such provision in the masterplan going forward."

- 4.16 In relation to other potential sites within Ebbsfleet Garden City, the response from EDC states that it does not own any other land within the Dartford Borough area of the Garden City. In relation to specific areas, it notes that:
- Swanscombe Peninsula is covered by the London Resort Nationally Significant Infrastructure Project and is unsuitable for gypsy and traveller accommodation due to existing site constraints and uses;
 - Other sites such as Eastern Quarry and Ebbsfleet Cross benefit from existing planning permissions that are in the process of being built out by private developers; and
 - Bean Triangle is within the Green Belt so is excluded from the Council's search area.

EDC consider that in the event that the London Resort theme park does not proceed, there could be opportunities to explore gypsy and traveller provision on parts of that site that may be suitable for it. In this case, EDC would be open to exploring options where it could proactively assist the Council.

New Sites – Council Owned Land

- 4.17 It is also relevant to consider the potential for land owned by councils (in this case, Dartford Borough Council and Kent County Council) to come forward as new sites to meet outstanding needs for pitches for gypsies and travellers. For the purpose of

assessing whether any suitable local authority owned sites are available, the qualification measures set out in the table below were used.

Issue	Qualification Measure
Location	Sites should be located on the edge of the urban built up area or rural settlements but not within the Green Belt
Flood Risk	Sites should not be within flood zone 3.
Biodiversity	Sites should not be within a Site of Special Scientific Interest or Local Wildlife Site
Open Space	Sites should not be within a Protected Local Green Space or a Borough Open Space
Community Use	Sites should not comprise an existing or former community use

- 4.18 The only land owned by Dartford Borough Council which could potentially meet the criteria set out in paragraph 4.17 is at Stone Lodge, Cotton Lane, Stone. However, part of this currently comprises premises used by a judo club, a bowls club and the new premises for a rugby club (with a clubhouse and two floodlit rugby pitches currently being implemented under planning permission reference 17/02105/FUL granted on 24 April 2018). The remaining part of the area was granted outline planning permission for the erection of an 8 form entry secondary school, up to 140 residential dwellings and provision of 19ha of public open space on 24 May 2019 (ref 18/01074/OUT and varied by 20/00746/VCON). There have been a number of subsequent applications for approval of reserved matters and submission of details relating to conditions. Implementation of the school development is underway. Therefore, it is being taken forward for a mix of community uses and residential development and, in light of this, is not available for the provision of pitches for gypsies and travellers.
- 4.19 Dartford Borough Council has recently made a formal request to Kent County Council to consider whether it owns any sites which could potentially be brought forward for gypsy and traveller pitches. A response is awaited.

5 CONCLUSIONS

- 5.1 There are significant needs for traveller sites in the next five years and in the longer term, and several actions to accommodate needs have been undertaken, including proposed allocations in the Pre-Submission Local Plan. Quantitative aggregate need requirements have been given close consideration alongside site specific delivery factors and achievement of national and local policy objectives for gypsies, travellers and travelling showpeople.
- 5.2 The Council has set out a policy framework that is focused on meeting needs in a deliverable way that can realistically continue to be implemented over time. Recent planning permissions are an example of Council actions in this vein.
- 5.3 In the Pre-Submission Local Plan, it is proposed that many needs can be met by intensifying and/ or extending existing authorised and tolerated sites. This is consistent with the origins of need in Dartford, and therefore maximises delivery prospects.
- 5.4 Some authorised and tolerated sites have been identified as having the capacity to accommodate additional pitches to meet needs arising (paragraph 4.2) and, where these would need planning permission, these sites have been identified in Pre-Submission Local Plan policy M12 (paragraph 2.5).
- 5.5 The quantification of the precise scale of contribution, the amount of pitches meeting the identified level of need, the capacity of these sites and the potential of other sites to provide additional pitches is subject to ongoing work. This involves liaising with the occupiers of sites and drawing up plans but this work has been significantly hampered by Covid-19 related tier and national lockdown restrictions which have made it impossible to visit sites, liaise with occupiers on site and draw up plans to date. Now that restrictions have been lifted, this work will continue.
- 5.6 Unless clear reasons emerge to the contrary, it is anticipated that a new site would be needed to meet the needs arising for traveller pitches within the next five years. The first priority has been to consider potentially suitable sites in the urban area. Providing traveller pitches as part of the development of strategic sites is an accepted method of meeting needs. The Council has considered its allocated sites and areas with potential for future development (paragraph 4.9). It has carried out an initial, high level assessment of these, together with other potential sites within Ebbsfleet Garden City (paragraph 4.10). This found that Ebbsfleet Central is potentially suitable in principle for the provision of some traveller pitches if considered as part of, and integrated within, wider proposals for the development of the site (paragraph 4.11).
- 5.7 In this respect, the Council made a formal request to the Ebbsfleet Development Corporation (EDC) to incorporate the requirement for traveller pitches within its masterplanning work for the Ebbsfleet Central site (paragraph 4.14). However, the EDC responded that the provision of traveller pitches in this location would make inefficient use of land and would be incompatible with the creation of a high density urban development. As a result, the EDC's ongoing masterplanning work does not include provision for gypsy and traveller accommodation (paragraph 4.15).
- 5.8 Swanscombe Peninsula is covered by the London Resort Nationally Significant Infrastructure Project and is currently unavailable for gypsy and traveller accommodation, and there also may be other existing constraints and uses affecting

parts of the land. In the EDC area generally, sites already benefit from existing planning permissions that are being built out by private developers (paragraph 4.16).

- 5.9 The Council has also more recently made a formal request to Kent County Council to consider whether it owns any sites which could potentially be brought forward for gypsy and traveller pitches. A response is awaited (paragraph 4.19).
- 5.10 It is likely that the needs for travelling showpeople can be met on the existing site which would not need planning permission or identification in the Local Plan (paragraph 4.8). This is subject to a site visit, liaison with the occupiers on site and the production of a plan to show how this could be accommodated. Work on this will continue now that restrictions relating to Covid-19 have been lifted.
- 5.11 These actions, as summarised in the Pre-Submission Local Plan, demonstrate that the Council has made significant progress and is actively working towards meeting needs for traveller and travelling showpeople's accommodation. The development management criteria in section 2 of policy M12 in the Pre-Submission Local Plan provide a framework for potential new sites to come forward.

APPENDIX A: Definitions

The definitions below are taken from Annex 1 of the Planning Policy for Traveller Sites 2015 by the Department for Communities and Local Government.

Gypsies and Travellers:

Persons of nomadic habit of life whatever their race or origin, 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, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

In determining whether persons are "gypsies and travellers" for the purposes of this planning policy, consideration should be given to the following issues amongst other relevant matters:

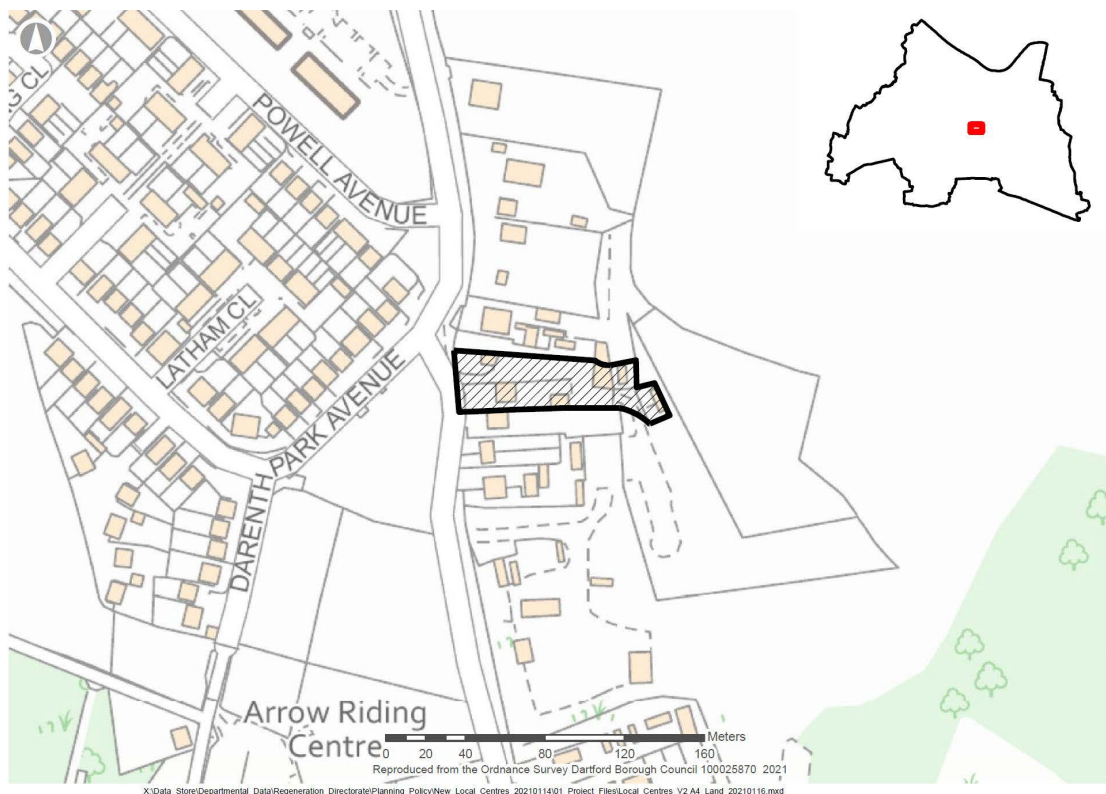
- a) whether they previously led a nomadic habit of life
- b) the reasons for ceasing their nomadic habit of life
- c) whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.

Travelling Showpeople:

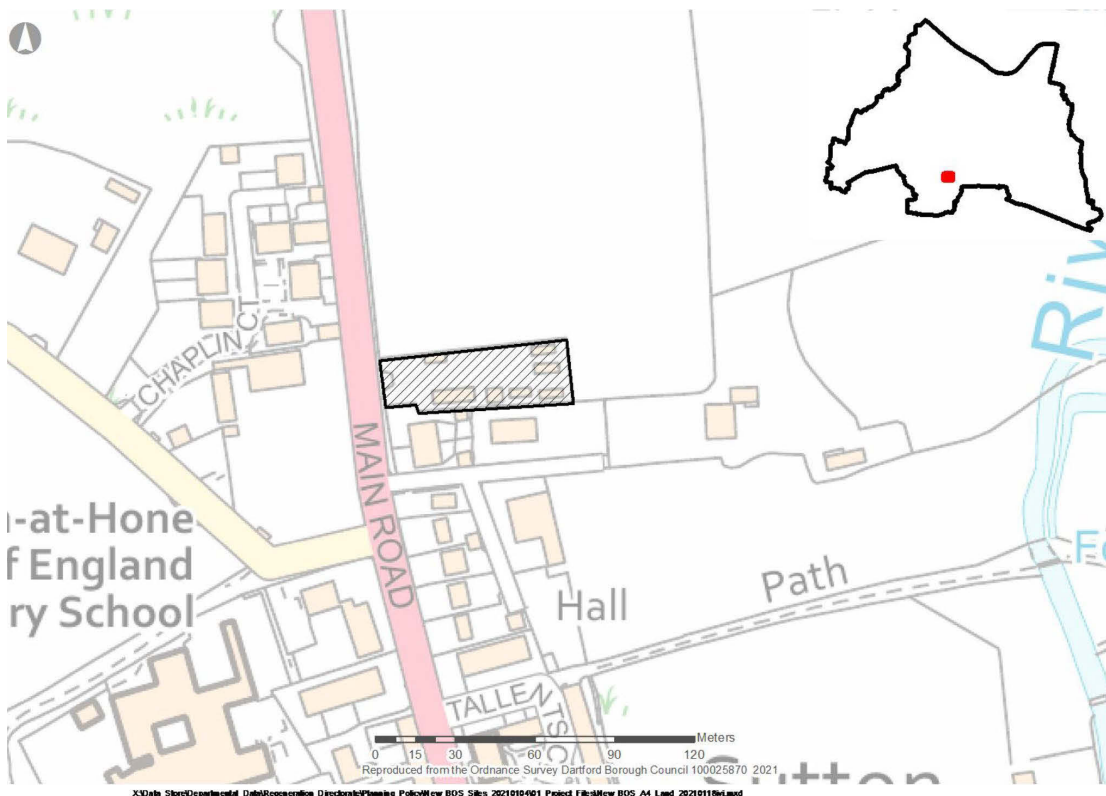
Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above.

APPENDIX B: Policies Map Excerpts

Salinas, Darenth Wood Road



Tennis Courts, Sutton at Hone



APPENDIX C: Council request to Ebbsfleet Development Corporation and Response

Letter from Dartford Borough Council to Ebbsfleet Development Corporation

Regeneration Services

Ebbsfleet Development Corporation

Please ask for:

Direct Line:

E-mail:

Your Ref:

Our Ref:

Date: 30 December 2020

Dear

Gypsy and Traveller Accommodation

I would like to raise with you the issue of the provision of gypsy and traveller accommodation within Dartford Borough.

National Planning Policy

As part of Local Plan work, the national Planning Policy for Traveller Sites (PPTS) requires us to:

- set pitch targets for gypsies and travellers to address the likely accommodation needs of travellers in our area
- identify a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets – these must be available now, offer a suitable location for development and have a realistic prospect of delivery within 5 years
- identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15 – these should be in a suitable location and have a reasonable prospect of being available for development at the point envisaged
- relate the number of pitches to the circumstances of the size and location of the site and surrounding population's size and density
- protect local amenity and environment

The PPTS states that criteria should be set to guide land supply allocations where there is identified need and paragraph 13 sets out a number of factors which we need to consider. It makes clear that traveller sites are inappropriate development in the Green Belt and that Green Belt boundaries should be altered only in exceptional circumstances.

Needs in Dartford Borough

In light of the national policy, we employed consultants to carry out a Dartford Gypsy and Traveller Accommodation Assessment (GTAA) in 2019. As indicated in the Local Plan Preferred Options consultation document in January 2020, the GTAA identified a need for 48 additional permanent pitches for gypsies and travellers who meet the national definition in the next 5 years. Since then, Dartford Borough Council has granted planning permission for 11 pitches by granting permanent planning permission for temporary pitches, allowing some extensions to existing sites, and authorising some pitches that were previously unauthorised. This reduces the need to 37 pitches in the 5 year period. It should be noted that the GTAA identified a total need for 70 pitches to 2035 for those who meet the national definition

Local Plan Preferred Options

In the Preferred Options Local Plan consultation which we carried out in January/ February 2020, the Council set out the following approach towards providing land to provide a supply of deliverable gypsy and traveller sites:

- K3 The following principles will be the focus for considering the potential of land to provide a supply of deliverable sites:
- Additional accommodation within existing authorised site boundaries (subject to licensing requirements), some of which would not require planning permission or allocation within the Local Plan. Potential sites are: Castle Farm[^], Knoxfield Plot 3[^], Salinas[^], Forest Amusements[^], Hillside*, Sauleskalns, Tennis Courts.
 - Sites occupied under temporary planning permissions being granted permanent planning permission. The only existing temporary planning permission is at Brakefield Road.
 - Small scale low impact extensions to existing authorised gypsy and traveller sites. There are current planning applications for extensions at Cob Tree Farm and Brakefield Road which may or may not fall into this category.
 - Potential sites within Ebbsfleet Garden City.
- [^] Sites that do not require planning permission or allocation within the Local Plan
* Site has an extant planning permission
- K4 In the event that the above sources do not provide sufficient accommodation to meet the 5 year needs, the Council will carry out a Borough-wide search for new sites. This will include other areas that are not within the Green Belt and sites that may be put forward in response to this consultation or as a result of a consultation with landowners prior to the publication of the Local Plan.
- K5 The preference will be to avoid an overconcentration of sites in a single part of the Borough.
- K6 In order to consider the potential for allocating sites which are deliverable, the Council will:
- consult landowners of both existing and potential sites
 - liaise with Ebbsfleet Development Corporation.

Additional Information Gathering and Evidence

All of the current gypsy and traveller sites within Dartford Borough are within the Green Belt. Most of them are either authorised or tolerated (i.e. immune from enforcement action) and the majority are owned and occupied by extended family groups. As set out in paragraph K3 of the Preferred Options Local Plan, we think that some of them could accommodate additional caravans to meet current and short term needs (due to overcrowding and teenagers reaching adulthood) arising from their sites. We have employed consultants to liaise with the site owners/occupiers and produce plans for the relevant sites. Whilst this will go some way to meeting our 5 year need, it will not meet all of it, and there are also longer term needs to 2035 to consider.

We have looked at how some other recently adopted Local Plans in areas affected by Green Belt policy restrictions have addressed the issue of gypsy and traveller pitch provision. The adopted East Herts Local Plan 2018 makes provision through expanding an existing site, providing a new site of 15 pitches within an urban extension which will also meet needs arising from an adjoining Borough, and safeguarding an area within an urban extension. The adopted Guildford Local Plan 2019 includes requirements for provision to be made on a number of large allocated regeneration sites and on windfall sites of more than 500 homes, as well as allowing intensification and permanent provision on existing sites. The adopted Chelmsford Local Plan 2020 identifies a site for 10 pitches which was secured by the Council through S106 planning obligations linked to existing planning approvals at sites in the adopted North Chelmsford Area Action Plan.

Paragraph K3 of the Preferred Options also stated that the Council would focus on potential sites within Ebbsfleet Garden City and it is clear from approaches in other adopted Local Plans, examples of which are set out above, that the provision of gypsy and traveller pitches on strategic sites is an accepted method of meeting needs. Given national policy on the Green Belt, it is important that non Green Belt sites are considered before Green Belt ones (which rules out consideration of Bean Triangle). In line with this policy approach, we have carried out some initial assessments of non-Green Belt sites within Ebbsfleet Garden City using the criteria set out in proposed policy M12 below. This takes on board the results from the Dartford Strategic Housing Land Assessment. The following table sets out the conclusions for each site.

Site	Site Assessment Outcome
The Tank	Potentially suitable but unavailable for development, affected by proposals for London Resort
Essenden	Potential depends on suitability of the access and overcoming noise and land contamination issues but unavailable for development, affected by proposals for London Resort
Swanscombe Peninsula	Unsuitable given its location within flood risk area, also potential issues of land contamination and noise/disturbance from the railway/ existing employment uses, but unavailable for development, affected by proposals for London Resort
Ebbsfleet Central (including Bamber Pit)	Potentially suitable and available if considered as part of, and integrated within, wider proposals for the development of the site

You will see that only Ebbsfleet Central is potentially suitable and available for the provision of gypsy and traveller pitches. You have previously expressed concern that the provision of gypsy and traveller sites in this location would not be appropriate in urban design terms. However, it is a very large site which is currently subject to detailed masterplanning work and we have not seen any evidence to suggest that an area for gypsy and traveller pitches could not be incorporated within the development. Dartford's only other proposed strategic sites lie within Central Dartford which would not be appropriate for gypsy pitch provision given that much of it is at high risk of flooding and such development could not be incorporated in a way which is appropriate to the scale and nature of existing development there.

Publication Local Plan – Proposed Policies

The current iteration of the proposed Gypsy, Traveller and Travelling Showpeople Accommodation policy (policy M12) is set out below. We intend to discuss this approach with members and the potential land for allocation will depend on the outputs of the work by the consultants. Land allocations are likely to be within or small scale extensions to existing sites to meet needs arising from those sites where the stationing of additional caravans would require planning permission.

Policy M12 Gypsy, Traveller and Travelling Showpeople Accommodation

1. Dartford will meet needs and maintain a Five Year Supply, with deliverable land to meet identified requirements for X gypsy and traveller pitches and X travelling showpeople plots. This will occur through a range of actions including:
 - a) Realising the potential for additional accommodation within existing authorised and tolerated sites, where needs arise;
 - b) Allocating land for additional pitches at: XXX; and
 - c) Determining planning applications expeditiously in line with national policy and the development management criteria set out in clause 2 below.
2. Planning applications for gypsy and traveller pitches and travelling showpeople plots will be assessed against relevant local and national policy requirements.

Proposals located in the Green Belt will be determined in accordance with the balancing exercise set out in national policy, taking into account impacts on the openness and purposes of the Green Belt, and having regard to relevant material considerations. All proposals must demonstrate that the site:

- a) Is of a scale to accommodate and has the potential to provide the facilities required for future occupants in terms of amenity and in meeting site licensing requirements;
- b) Is of a scale appropriate to the ability of the surrounding community to accommodate the development without significant detriment to neighbouring residential amenity, taking account of existing population size and density;
- c) Is not in an area liable to flooding; and suitable drainage can be installed that does not lead to unacceptable risks to groundwater and/or localised flooding
- d) Is located close to a range of services and facilities;
- e) Has the ability to provide appropriate safe vehicular access to the site and provides suitable parking and amenity areas; and
- f) Is screened and visually integrated into the local and wider landscape, with careful siting within the site (including of any day rooms).

Policy E1 (Ebbsfleet Garden City Strategy) of our draft publication Local Plan includes a criterion stating that the EDC and the Council will explore opportunities for achieving appropriate Gypsy Travellers and Travelling Showpeople site provision to help meet the needs of the Borough.

Request

In light of Ebbsfleet Central being the only potentially suitable and available strategic development site suitable for the provision of gypsy and traveller pitches, could you let me know how Ebbsfleet Development Corporation will incorporate the requirement for pitches within its masterplanning work for the area? If there is evidence which the EDC can provide which clearly rules out such provision at Ebbsfleet Central, could you let me know how the Development Corporation can help bring forward gypsy pitch provision on other potentially suitable non-Green Belt sites within its area?

Yours sincerely

Response from Ebbsfleet Development Corporation to Dartford Borough Council



Sent by email only to:

Ebbsfleet Development Corporation
The Observatory
Castle Hill Drive
Castle Hill
Ebbsfleet
Kent DA10 1EE

3rd June 2021

Dear

Gypsy and Traveller Accommodation in Dartford Borough

I write in response to your letter dated 30th December 2020 and subsequent email correspondence in respect of the provision of gypsy and traveller accommodation within Dartford Borough.

In light of the identified need for additional permanent pitches for gypsies and travellers in Dartford, it is acknowledged that the Borough Council is keen to explore the potential for such provision on sites within the Ebbsfleet Garden City. The Ebbsfleet Development Corporation (EDC) encourages and benefits from close liaison with the local authorities so welcomes the opportunity to explore this issue with you.

The site assessment undertaken by the Borough Council identifies that only Ebbsfleet Central is potentially suitable and available for the provision of gypsy and traveller pitches, if considered as part of, and integrated within, wider proposals for the development of the site.

As you're aware, in October 2019, EDC purchased the freehold of 125 hectares of land within the Ebbsfleet Garden City, known as Ebbsfleet Central. Prior to EDC's acquisition the land was in private ownership and issues of viability and uncertainty have meant that no development has been delivered. This land was acquired in order to support delivery of the full Garden City ambition as set out in the Ebbsfleet Implementation Framework, which identifies that Ebbsfleet Central will comprise "high density urban development providing a range of job, homes, community and cultural facilities" and act as a "dynamic new heart for Ebbsfleet".

EDC are currently developing a new masterplan for the area based on the aspirations of the Implementation Framework and Garden City Principles which will guide the successful delivery of the heart of the Garden City and will seek a new outline planning permission to secure the quantum and design framework of future development in Ebbsfleet Central. Building on the Implementation Framework, EDC have developed a vision for Ebbsfleet Central as follows:

- *At the heart of the Garden City, Ebbsfleet Central will capitalise on its unparalleled connectivity to deliver the next generation of high quality, flexible workspace, creating a new dynamic and innovative sub-regional business hub integrated through well designed public realm and green spaces with vibrant, sustainable urban neighbourhoods and amenities to support a healthy, happy lifestyle.*

This vision aligns with the Borough Council's emerging Local Plan policy which states that development at Ebbsfleet Central will be supported where it provides a comprehensively planned

strategic urban hub, with a full mix of activities including employment, health/education, retail/leisure, and residential development which is well integrated in the wider area; and supported by new open and public spaces, and major new transport and community infrastructure.

The Borough Council will be aware of the various constraints to development of this site that present major challenges, including the recently notified Site of Special Scientific Interest (SSSI) that comprises a large part of the Ebbsfleet Central land that lies within Dartford Borough. This is a significant additional constraint reinforcing the requirement to make most efficient use of the land available for development to ensure the shared vision of EDC and the Borough Council's is realised. This approach requires a high density urban form of development.

Due to the land requirements for gypsy and traveller pitches, which would provide low density development that makes inefficient use of land, such provision in this location would not be appropriate in urban design terms as it would be incompatible with the creation of a high density urban development.

Accordingly, to support realisation of the vision, whilst seeking to incorporate various housing typologies and tenures to meet different needs, the initial master planning work for Ebbsfleet Central, as presented to Borough Council officers in February 2021, does not include provision for gypsy and traveller accommodation. Furthermore, for the reasons stated above it is not the intention of EDC to seek to incorporate such provision into the masterplan going forward.

In anticipation of this position, your letter asks how the EDC could help bring forward gypsy pitch provision on other potentially suitable non-Green Belt sites within the Garden City.

At this time, EDC does not own any other land within the Dartford Borough area of the Garden City. The most substantial area, Swanscombe Peninsula, is covered by the Nationally Significant Infrastructure Project (NSIP) status in respect of the proposed London Resort theme park and on the whole unsuitable for gypsy and traveller accommodation due to existing site constraints and uses. Other sites such as Eastern Quarry and Ebbsfleet Cross, benefit from existing planning permissions that are currently in the process of being built out by private developers. As acknowledged in your letter, the Bean Triangle is within the Green Belt so is excluded from your search area.

However, in the event that the London Resort theme park does not proceed, there could be opportunities to explore gypsy and traveller provision on parts of that site that may be suitable for it. In this scenario, EDC would wish to be involved in any such discussions and would be open to exploring options whereby EDC could proactively assist the Borough Council.

Yours sincerely

EDC Chief Planning Officer

pitches in the period from 2019 to 2026. It should be noted that the GTAA identified a total need for 70 pitches to 2035 for those who meet the national definition.

Local Plan Preferred Options

In the Preferred Options Local Plan consultation which we carried out in January/ February 2020, the Council set out the following approach towards providing land to provide a supply of deliverable gypsy and traveller sites:

- K3 The following principles will be the focus for considering the potential of land to provide a supply of deliverable sites:
- Additional accommodation within existing authorised site boundaries (subject to licensing requirements), some of which would not require planning permission or allocation within the Local Plan. Potential sites are: Castle Farm[^], Knoxfield Plot 3[^], Salinas[^], Forest Amusements[^], Hillside*, Sauleskalns, Tennis Courts.
 - Sites occupied under temporary planning permissions being granted permanent planning permission. The only existing temporary planning permission is at Brakefield Road.
 - Small scale low impact extensions to existing authorised gypsy and traveller sites. There are current planning applications for extensions at Cob Tree Farm and Brakefield Road which may or may not fall into this category.
 - Potential sites within Ebbsfleet Garden City.

[^] Sites that do not require planning permission or allocation within the Local Plan

* Site has an extant planning permission

- K4 In the event that the above sources do not provide sufficient accommodation to meet the 5 year needs, the Council will carry out a Borough-wide search for new sites. This will include other areas that are not within the Green Belt and sites that may be put forward in response to this consultation or as a result of a consultation with landowners prior to the publication of the Local Plan.
- K5 The preference will be to avoid an overconcentration of sites in a single part of the Borough.
- K6 In order to consider the potential for allocating sites which are deliverable, the Council will:
- consult landowners of both existing and potential sites
 - liaise with Ebbsfleet Development Corporation.

Pre-Submission (Publication) Dartford Local Plan

We published the Pre-Submission Dartford Local Plan for consultation from February to April 2021. As a result of the notification of the Swanscombe Peninsula Site of Special Scientific Interest in March 2021, we have had to make changes to the Plan and will be publishing a second Pre-Submission Local Plan for consultation in September 2021.

The second Pre-Submission Local Plan includes the following policy M12 in relation to Gypsy, Traveller and Travelling Showpeople Accommodation:

1. Dartford will meet needs and maintain a Five Year Supply, with deliverable land to meet identified requirements for 34 gypsy and traveller pitches and 1 travelling showpeople plot to 2026. This will occur through a range of actions including:
 - a) Realising the potential for additional accommodation within existing authorised and tolerated sites, where needs arise;

- b) Allocating land for additional pitches at: Tennis Courts Sutton at Hone and Salinas Darenth Wood Road;
 - c) Actively seeking to identify deliverable non Green Belt sites within Ebbsfleet Garden City; and
 - d) Determining planning applications expeditiously in line with national policy and the development management criteria set out in criterion 2 below.
2. Planning applications for gypsy and traveller pitches and travelling showpeople plots will be assessed against relevant local and national policy requirements. Proposals located in the Green Belt will be determined in accordance with the balancing exercise set out in national policy, taking into account impacts on the openness and purposes of the Green Belt, and having regard to relevant material considerations. All proposals must demonstrate that the site:
- a) Is of a scale to accommodate, and has the potential to provide the facilities required, for future occupants in terms of amenity and in meeting site licensing requirements;
 - b) Is of a scale appropriate to the ability of the surrounding community to accommodate the development without significant detriment to neighbouring residential amenity, taking account of existing population size and density;
 - c) Is not in an area liable to flooding; and suitable drainage can be installed that does not lead to unacceptable risks to groundwater and/or localised flooding;
 - d) Is located reasonably close to a range of services and facilities;
 - e) Has the ability to provide appropriate safe vehicular access to the site and provides suitable parking and amenity areas; and
 - f) Is screened and visually integrated into the local and wider landscape, with careful siting within the site (including of any day rooms).

Additional Information Gathering and Evidence

All of the current gypsy and traveller sites within Dartford Borough are within the Green Belt. Most of them are either authorised or tolerated (i.e. immune from enforcement action) and the majority are owned and occupied by extended family groups. As set out in policy M12 criteria 1a and 1b, we consider that some of them could accommodate additional caravans to meet current and short term needs (due to overcrowding and teenagers reaching adulthood) arising from their sites. We have employed consultants to liaise with the site owners/occupiers and produce plans for the relevant sites but this work has been delayed owing to the local and then the national covid-19 restrictions which were in place until recently. Whilst this will go some way to meeting our 5 year need, it will not meet all of it, and there are also longer term needs to 2035 to consider.

In accordance with criterion 1c of policy M12 and following some high level site work, the Council made a formal request to the Ebbsfleet Development Corporation (EDC) to incorporate the requirement for gypsy and traveller pitches within its masterplanning work for the Ebbsfleet Central Site. However, the EDC responded that the provision of traveller pitches in this location would make inefficient use of land and would be incompatible with the creation of a high density urban development. As a result, EDC's ongoing masterplanning work does not include provision for gypsy and traveller accommodation. Furthermore, the EDC referred to other non Green Belt sites within the Garden City. In this respect, it was stated that Swanscombe Peninsula is covered by the London Resort Nationally Significant Infrastructure Project and is unsuitable for gypsy and traveller accommodation due to existing constraints and uses. Other sites within the Garden City already benefit from existing planning permissions that are being built out by private developers.

In light of the fact that existing sites are unlikely to fully meet our needs for gypsy and traveller pitches to 2026 and that needs these cannot be accommodated on sites coming forward within Ebbsfleet Garden City, we have broadened our search for potential deliverable sites. In this respect, we have looked at how some other authorities have carried out searches for sites which could be suitable for the provision of pitches for gypsies and travellers to meet needs.

Studies carried out to support new Local Plans in East Hertfordshire, Basildon and Reading all considered the potential of Council owned sites. Therefore, we are also looking at whether there could be any potential Council owned sites which may be suitable for allocation for gypsy and traveller pitches in the new Dartford Local Plan. This includes sites owned by Dartford Borough Council and Kent County Council.

For the purpose of assessing whether any suitable Council owned sites are available, the qualification criteria set out in the table below were used.

Issue	Qualification Criteria
Location	Sites should be located on the edge of the urban built up area or rural settlements but not within the Green Belt
Flood Risk	Sites should not be within flood zone 3.
Biodiversity	Sites should not be within a Site of Special Scientific Interest or Local Wildlife Site
Open Space	Sites should not be within a Protected Local Green Space or a Borough Open Space
Community Use	Sites should not comprise an existing or former community use

Dartford Borough Council has considered its landholdings and has been unable to identify any potential sites which meet the qualification criteria listed above.

Through Kent County Council's previous responses to consultations on the new Dartford Local Plan, the Borough Council is aware of four sites which are owned by Kent County Council. The assessments of these against the qualification criteria are set out in the table below.

Site	Qualification Outcome
South of Steele Avenue, Greenhithe	Disqualified – Not on the edge of the urban built up area, being taken forward for development for a community use
The Limes School Facility, Brent Lane, Dartford	Disqualified – Not on the edge of the urban built up area, existing/former community use
County Estate Department Depot, Broad Lane, Wilmington	Qualifies – Meets all of the qualification criteria
Former Rowhill School Site, Stock Lane, Wilmington	Disqualified – Within the Green Belt, part of site is Borough Open Space, former community use

The County Estate Department Depot site at Broad Lane, Wilmington, meets these criteria. In order to assist our consideration of its potential suitability for gypsy and traveller pitches, we are providing an opportunity for KCC as landowner to supply further information that may be held on the land. Further assessment work by DBC is required in relation to the site.

Request

Could Kent County Council confirm whether or not the County Estate Department Depot site at Broad Lane, Wilmington, could be made available for gypsy and traveller pitches to meet identified needs arising as a result of work on the new Dartford Local Plan? Does Kent County Council own any other sites which could potentially be brought forward for the provision of gypsy and traveller pitches in Dartford Borough?

Summary

Existing sites in Dartford Borough are unlikely to fully meet our needs for gypsy and traveller pitches to 2026. Therefore, we have broadened our search for potential deliverable sites. In this respect, we are looking at whether there could be any potential Council owned sites which may be suitable for allocation for gypsy and traveller pitches in the new Dartford Local Plan. This includes sites owned by Kent County Council. We are asking if KCC has any sites which

could potentially be brought forward for gypsy and traveller pitches, including the County Estate Department Depot site at Broad Lane, Wilmington.

We look forward to receiving your response to this request. It would be helpful if we could receive this by 27 August 2021.

Yours sincerely

Planning Policy Manager