

## **Examination of the Dartford Local Plan**

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Mr Mark Aplin  
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23 June 2023

Dear Mr Aplin,

### **Dartford Local Plan examination – Outcome following further hearing session relating to Gypsies, Travellers and Travelling Showpeople**

1. Following the further hearing session on Matter 2 issue 4 in relation to accommodation for gypsies, travellers and travelling showpeople, I am now in a position to set out my recommendations for progressing the examination. I am grateful for the additional evidence provided in support of the Council's suggested alterations to the Green Belt boundary in order to help meet identified needs.
2. The Council's evidence indicates that the net need for additional pitches arising over the period to 2035 is 70 pitches, with 27 pitches required by 2027 as updated by document EXAM26. In response, the Council is proposing to allocate land sufficient to provide a further 12 pitches through the Local Plan.
3. Evidence contained in the Gypsy and Traveller Accommodation Assessment (GTAA) [GAT-1] indicates that in the main, the need for traveller pitches arises from the growth of traveller families, children reaching adulthood and requiring their own accommodation on existing sites and temporary planning permissions for pitches expiring during the next 5 years. The plan therefore seeks to meet that need where it arises through a range of measures, including the identification of existing sites for expansion which are currently in the Green Belt.
4. As discussed during the hearing sessions, my concern with this approach was that, as submitted, the plan was unclear whether the sites would remain within the Green Belt, which could have restricted their deliverability, and thus, effectiveness as allocations. The Council subsequently clarified that it was seeking to remove the allocated sites from the Green Belt and provided further information to substantiate its position.

5. Following your submission of further evidence and discussion of the issue at the most recent hearing session, I agree that there could be exceptional circumstances in this instance to justify removing the gypsy and traveller allocations from the Green Belt. This is due to the acuteness of the need, the specific location of the need arising (i.e. from family growth where it is currently located) and the lack of any suitable identified alternatives, including seeking to meet unmet need in locations outside the Borough. It would also ensure that the allocations are effective.
6. Even in the event that the allocated sites do come forward as expected, there would still remain a shortfall of 15 pitches within the first 5 years of the plan, contrary to the Planning Policy for Traveller Sites. However, there are limited options available to address this shortfall. During the hearing session we discussed whether an early review of the Plan would be appropriate to find more sites. But based on those discussions I agree with the Council that a further call for sites is highly unlikely to result in a different outcome due to the lack of reasonable alternatives as you confirmed that no sites had been put forward by landowners through the Strategic Housing Land Availability Assessment for this purpose. Furthermore, no other alternative options have been identified through discussions with neighbouring authorities.
7. A further option could be to pause the examination and task the Council with finding additional sites now. For example, the Council indicated that there may be some capacity on land at Sauleskalns which could possibly be expanded to meet needs. However, there is no evidence that the landowner would make the site available. Therefore, whilst the site may possibly come forward in the future, seeking to allocate it now would not be an effective means of meeting the identified need. I am therefore not convinced that pausing the examination and trying to find more sites would do anything other than prolong the examination with no guarantee of a positive outcome. Indeed, from the evidence, it is clear to me that there is no realistic prospect of the Council being able to find sufficient land to meet the need identified.
8. This leads me to the conclusion that the soundness issue can only be rectified by a very permissive approach to windfall sites. As such, submitted policy M12 will therefore require significant modification to provide a positive policy framework to address pitch needs as far as is possible. There will also need to be accompanying Main Modifications to strategic policies S1 and S4 to set out the strategic context and requirement for the release of land from the green belt. Policy M12 will require Main Modifications that provide positive support for the granting of temporary pitches as permanent when these sites are subject to future planning applications, criteria to ensure acceptable living conditions for existing and future residents, criteria to safeguard existing sites from loss to other uses in order to protect the supply, criteria to address any applications submitted through the development management process for traveller pitches in future along with the other revisions as discussed

during the hearing sessions for effectiveness. All of these modifications are necessary for soundness.

9. As such, I therefore recommend that the Council prepares the necessary Main Modifications described above which will need to be included as part of the wider schedule of modifications for public consultation. Please note that this letter does not constitute my final conclusions on the matter. These will be set out in my final report in due course once I have taken into account any representations made following the Main Modifications consultation.
10. I have asked the Programme Officer to add a copy of this letter to the examination website to keep participants and other interested parties up to date.
11. I look forward to working with you to prepare the Main Modifications as indicated above, and if you have any further queries, please do not hesitate to let me know via the Programme Officer.

*Philip Mileham*

INSPECTOR