

**APPENDIX 3 TO ITEM 7 OF THE GYPSY AND TRAVELLER  
ADVISORY BOARD – 22 JULY 2009**

Item 4a

**RSS Partial Review: Gypsy and Traveller Accommodation**

**Joint Member Steering Group: 13<sup>th</sup> July 2009**

**Subject: South East Plan Review: Accommodation for Gypsies and Travellers in the South East: Consultation on Proposals submitted to Government by the Regional Planning Body for the South East**

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**Summary**

**This note considers the issues raised in the Government's current public consultation on the proposals submitted by the South East England Partnership Board for the level and distribution of pitches to be provided for Gypsies and Travellers in the South East**

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**Introduction**

1. Between 1 September 2008 and 21 November 2008 the former Regional Assembly undertook public consultation on four options for the distribution of permanent residential pitches for Gypsies and Travellers and Travelling Showpeople based on the total level of need identified in combined final council advice, and, in the case of Showpeople, an additional element of unaccounted for regional need. The issues raised were discussed at the last JMSG on the 10<sup>th</sup> November 2009.

2. At its plenary meeting in March the former Regional Assembly approved its preferred option for submission to Government and subsequent consultation. Its main elements are:

- i. A draft replacement for Policy H7 of the South East Plan including provision for 1,064 residential pitches for Gypsies and Travellers and 302 for travelling Showpeople in the period 2006-2016 ;
- ii. A distribution of residential pitches for both Gypsies and Travellers and Travelling Showpeople based upon Option D consulted on in the Autumn of 2008;
- iii. A delegated approach to determining provision for transit, temporary and emergency stopping places through county group-based joint working.

3. The proposed policy is:

*"Policy H7: Provision for Gypsies, Travellers and Travelling Showpeople*

*Local Planning Authorities will make provision in Local Development Documents to deliver **1,064 net additional permanent residential pitches for Gypsies and Travellers** in the period 2006-2016, and 302 for Travelling Showpeople, as set out in Table H7a which details pitch requirements by local authority. Local Planning*

*Authorities will also make appropriate provision in Local Development Documents to meet requirements for transit and temporary stopping places.”*

4. This paper concentrates on the elements of the proposed policy approach which relate to gypsies and travellers. Subsequent papers on this agenda address matters relating to travelling Showpeople and transit provision.

**Consultation by SEERA on Options (Autumn 2008)**

5. In summary the 4 original options in SEERA’s consultation on Gypsies and Travellers accommodation were:

**Table 1: Summary of 2008 Consultation Options:**

	<b>South East Region</b>	<b>Kent &amp; Medway</b>
	<i>(Additional Pitches)</i>	
Option A – new pitches all provided as close as possible to where Gypsies and Travellers currently live	1064	320
Option B new pitches all provided in the same general area* but with neighbouring authorities within this area sharing the duty for providing new pitches	1064	320
Option C - half of new pitches should be in the same general area* where Gypsies and Travellers currently live with the other half spread across the region	1064	241
Option D – most (75%) of new pitches should be in the same general area* where Gypsies and Travellers currently live with a quarter spread across the region	1064	281

*\* i.e. Kent and Medway*

6. The Kent and Medway figures for Options A and B were those included in the advice provided by Kent authorities as revised in April 2008. Option A reflected the pattern of need identified through the GTAAs but with some adjustment to ensure greater consistency in treatment of specific factors in the needs assessment. Option B, as advised by the Kent authorities to SEERA, was the composite outcome of alternative distributions that reflected 6 planning and environmental criteria including the Metropolitan Green Belt.

7. Two additional options (C and D) were introduced by SEERA to provide for redistribution of accommodation need across the region. These have the effect of reducing, to varying degrees, overall provision in Kent and Medway which contains a substantial proportion (29%) of the region’s existing authorised pitches. As far as Kent and Medway are concerned Options A and B have the same total (320 pitches) whilst under Option C provision reduces by 25% and under Option D by 12%.

8. The total additional pitches at District and GTAA area level for each of these options and the range between them are in **Appendix 1**.

9 In submitting their original advice to the region on Options A and B the Kent authorities supported a pattern of new pitch provision which provided for some redistribution within the region given the historic concentration of supply in certain parts of the South East (notably Kent and Surrey).

10. However in their responses to the consultation on options in respect of their own areas the views expressed by Kent authorities were varied:

Option A: Ashford, Canterbury, Dover, Shepway, Thanet, Tunbridge Wells

Option B: Swale

Option C: Dartford, Maidstone, Sevenoaks, Tonbridge & Malling <sup>1</sup>

Option D: Gravesham

Others: KCC (alternative Option E – see below)  
Medway (no provision).

11. The differences in local authorities' views largely centred around those who considered that the level and distribution of pitches should be based solely on the needs assessments of the GTAAs (Option A) and those favouring the options influenced by a degree of redistribution within the region and within Kent (Options C and D). These options tend to increase requirements in areas where need assessments are relatively low, and decrease them where they are comparatively high. A distribution of new pitches based on needs based evidence alone (Option A) concentrates provision in the region and locally where sites already exist and has the disadvantage of reducing the degree of choice of locations available to Gypsies and Travellers.

12. Across the region 61% of Councils considered that the regional provision of pitches was "*about right*" and two thirds favoured the non-redistributive options A and B. However a majority of respondents supported some redistribution – 57% of respondents across the region favoured Options C or D. Significantly, two thirds of Gypsies and Travellers respondents also supported these options with more than half supporting the more redistributive Option C<sup>2</sup>.

13. Government advice<sup>3</sup> advocates consideration of an element of redistribution so that the responsibility for new pitch provision can be shared more widely between authorities than at present.

14. This redistributive approach has been reflected in the outturn of other RSS reviews. In the East of England, making provision in all districts (minimum of 15 pitches regardless of where need arises) was supported by the Examination Panel to provide increased flexibility and choice for Gypsies and Travellers and to assist the increased rate of delivery of additional pitches. Distribution away from the three

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<sup>1</sup> But based on Option A not B

<sup>2</sup> Partial Review of the RSS for the South East : Provision for Gypsies , Travellers and Travelling Showpeople Annex F page 48

<sup>3</sup> CLG: Preparing Regional spatial Strategy Reviews on Gypsies and Travellers. March 2007

districts with the largest current provision and local need was advocated because of the historic reasons for the marked differences that existed.

### **The Regional Planning Body's preferred option (D)**

15. Acting on what they considered to be a 'good' level of response the conclusions drawn by the Regional Assembly from the consultation were that:

- Whilst a majority of councils opposed regional redistribution and prefer options A and/or B, to proceed on this basis would ignore the mandate established for a degree of regional redistribution to widen GTTS choice and responsibility for provision.
- An 'Option A plus top-up' approach was considered similar to the approach used in the East of England Region. Whilst this would follow the need assessment approach favoured by the Gypsy and Traveller community, the conclusion was that it would diverge from the previously agreed approach, that allocations should be guided by planning and sustainability criteria.
- Option C found most support in the SE consultation, but the Assembly considered that its implications for Hampshire, more than doubling its contribution, would be too extreme.

16. In the light of this **Option D** was favoured, on balance, as a deliverable compromise. It was also agreed that that option B should continue to be the starting point for regional redistribution (rather than A), as the local redistributions put forward within option B will also help deliverability by widening responsibility for provision.

17. In summary the Regional Assembly found that none of the options were unchallengeable but that the alternatives to Option D, whilst credible, did not appear 'inherently preferable'.

18. In moving to its submission the Regional Planning Body (RPB) has revised its application of the methodology guiding the options on regional redistribution (Options C and D) using the latest data on land constraints. As result the total number of pitches allocated to Kent and Medway is increased from **281 to 290** for the preferred option D (the corresponding increase for Option C (not pursued) would have been considerably higher - 21 more pitches i.e. 262 not 241).

19. Option D is the lesser of the redistributive options considered by the RPB. At 290 pitches Kent and Medway would still have by far the largest number and proportion of pitches of the county areas in the region at 27% of the regional total (see Appendix 2). This is close to Kent and Medway's share of existing authorised provision in the South East region (29%) and thus reflects only very modest redistribution away from the Kent area. Option D is now only 30 pitches (9%) below the needs based total of Option A (320 pitches).

20. Whilst the option D total is distributed to District level (see Table 2) the submission provides for and indeed encourages collaborative working between

authorities and allows scope for allocations to be combined and redistributed between partner authorities 'where this would improve delivery outcomes'<sup>4</sup>.

**TABLE 3: Regional Planning Body's Preferred Option D as submitted to Government**

<b>District/ GTAA area</b>	<b>Option D submitted to Secretary of State: Additional pitches 2006-16</b>
Ashford	30
Maidstone	35
Tonbridge & Malling	18
Tunbridge Wells	14
<b>(West Kent GTAA)</b>	<b>(97)</b>
<b>Sevenoaks/Seven oaks GTAA</b>	<b>19</b>
Dartford	22
Gravesham	12
Swale	28
Medway	30
<b>(North Kent GTAA)</b>	<b>(92)</b>
Canterbury	30
Dover	23
Shepway	12
Thanet	17
<b>East Kent GTAA</b>	<b>(82)</b>
<b>Kent &amp; Medway</b>	<b>290</b>

*Note: Figures in brackets are the implied totals for GTAA areas but figures submitted are for county and district areas only*

### **Alternative perspectives for consideration**

21. It is worth recounting some of the features of the original consultation options:

**Option A:** was solely needs based but does not provide any element of redistribution of provision at GTAA area, county or regional levels;

**Option B:** reflected the level of need at a county level but provides no direct local need component (GTAA or district) as its distribution is driven solely by planning, environmental and sustainability criteria. This would redistribute provision within Kent but with no element of regional redistribution;

<sup>4</sup> Partial Review para 4.5

**Options C and D:** provided alternative levels of redistribution on a regional basis but:

(i) They used the Option B distribution as a starting point and thus there is no direct alignment, below the county level, with the pattern of need where it arises, that is shown in Option A;

(ii) For the apportionment of the redistributed element the RPB has used two 'broad brush' criteria (pattern of environmental constraints and population forecasts at 2016). Whilst the former is comparable with some of the criteria used by the Kent authorities for Option B the latter is used as a very general, proxy, measure for 'availability of opportunity'. No specific account is taken of considerations such as the extent of brownfield land development opportunities, the wider role of authorities in housing supply or comparative accessibility to key services which are taken into account in Kent's Option B. The latter also incorporates greater sensitivity to the nature of environmental constraints at, and around, key settlements where new pitch provision might be expected to be made;

(iii) the preferred Option D therefore reflects a pitch distribution based on the application of different mixes of planning and sustainability factors – part county wide and part regional;

(iv) The omission of a component reflecting the local pattern of need means that Options C and D involved substantial redistribution within Kent to parts of East Kent and stark curtailment of provision in districts with the highest levels of identified local need (Sevenoaks; Swale)

22. Given these considerations KCC felt that none of the four original options provided a sufficient balance between the factors outlined above. An alternative (Option E – see **Appendix 3**) was put forward which:

- retained a larger element of regional redistribution in line with Option C ;
- incorporated an element of the local pattern of need by using Option A, rather than Option B, as the starting point;
- adopted a local distribution of the 'pooled' regional element that 'comes back' to Kent that takes account of the more detailed and refined local planning and sustainability factors that were developed locally in the development of Option B.

23. The merits of Option E were considered to be that it:

- mirrored more closely and widely the pattern of need at district level while still providing an element of redistribution within Kent away from the localities with the highest levels of need;
- moderated the severity of impact of this redistribution on certain areas (parts of East Kent and Medway ) in comparison with Option C;
- continued to ensure that all districts make a contribution to new pitch provision ;
- ensured that at least 60% of district based need is accommodated in the same district where it arises in addition to the element of regional redistribution.

#### **Other alternatives**

24. As previously explained the pitch allocation to Kent and Medway has increased from 281 to 290 under Option D as now submitted. This also reflects revised shares of the regional reapportionment pool that would be allocated to each authority in Kent and Medway. Similar reworking would apply to Option C if it were still to be considered (see – Table 4 below - Option C (Revised ) involving a total of 262 pitches.

25. The Kent authorities Officers Steering Group has considered the changes to Options C and D relative to other options. The County totals in Option C (Revised) and 'submitted' Option D are now somewhat closer to Options A and B and this has 'weakened' the degree of implied regional redistribution from Kent. However their pattern within Kent has not significantly changed and remains subject to the concerns outlined in para. 21 above

26. In these circumstances Members' may wish to consider the merits of other approaches that:

- maintain the principle of regional redistribution; and
- provide for an internally coherent and consistent approach to the apportionment of the resultant Kent /Medway totals

***(a) Based on the higher level of regional redistribution (Option C approach) which has not been taken forward in the region's preferred option***

**(ii) Option C1:** Based on the Option C total (262 pitches) but using the pattern of need (Option A) as the starting point and for distributing the share of the regional apportionment (102 pitches) that 'comes back' to Kent/Medway.

**(iii) Option E (Revised):** reflecting the revised total (262 pitches) that would apply under Option C. This approach uses Option A as the starting point, but distributes the element of the 'pooled' regional requirement that is apportioned to Kent and Medway in Option C (102 pitches) on the basis of Option B.

***(b) Based on the lower level of regional redistribution provided for under the region's preferred option (Option D approach)***

**(iii) Option D1:** Based on the revised Option D total (290 pitches) but using the pattern of need (Option A) both as the starting point and for distributing the share of the regional apportionment (50 pitches) that 'comes back' to Kent/Medway.

**(iv) 'Option F':** Adopts the same approach as Option E but applied to the total of 290 pitches under Option D. This approach uses Option A as the starting point, but distributes the element of the 'pooled' regional requirement that is apportioned to Kent and Medway in Option D (50 pitches) on the basis of Option B.

27. These approaches are summarised in **Table 4** alongside the original consultation options (with account taken of subsequent revisions) and the region's preferred option (Option D).

**Table 4 : Previous consultation options , the Regional Planning Body's submitted proposals and alternative approaches**

	Option A	Option B	Option C (Revised)	RPB's Preferred Option D as Submitted to Government and subject of current consultation)	Option C1	Option E (Revised)	Option D1	Option F
Ashford	20	32	29	30	16	20	18	20
Maidstone	48	39	31	35	39	36	43	42
Tonbridge & Malling	14	20	16	18	11	13	13	14
Tunbridge Wells	11	15	13	14	9	10	10	11
Sevenoaks	57	22	16	19	47	36	52	46
Dartford	33	27	17	22	27	25	30	29
Gravesham	16	13	10	12	13	12	14	14
Swale	64	31	25	28	52	42	58	53
Medway	12	32	28	30	10	16	11	14
Canterbury	32	33	27	30	26	27	29	29
Dover	6	24	22	23	5	11	5	8
Shepway	2	13	11	12	2	5	2	4
Thanet	5	19	16	17	4	9	5	7
Kent and Medway Total	320	320	262	290	262	262	290	290

## Recent Changes in the Supply of Pitches

28. The South East Plan review relates to provision to be made over the period 2006-2016. One of the elements considered in the Kent local authorities' revised advice to SEERA in April 2008 was the need to take account of changes in the supply of permanent authorised pitches permitted since completion of the needs assessments. This has been updated for the period 2006-2009. Table 5 sets out the proposed Option D pitch allocations in Kent and Medway 2006-2016 alongside the residual number of pitches which would need to be found after taking account of additional permanent pitches permitted since 2006. Some 52 additional pitches have been permitted since 2006 with new supply concentrated in Maidstone and to a lesser degree Gravesham, Sevenoaks, Swale and Dartford.

**Table 5: Change in supply of permanent authorised residential pitches 2006-9 and residual requirements to 2016**

<i>District/ GTAA area</i>	<i>Existing private and public authorised residential pitches at mid 2006 (corrected figures )</i>	<i>Existing private and public authorised residential pitches at April 2009 (taking account of change in supply 2006-09)</i>	<i>Option D as submitted to the Secretary of State – Additional Pitches 2006-16</i>	<i>Option D Residual no. of pitches required 2009-16</i>
Ashford	106	108	30	28
Maidstone	115	135	35	15
Tonbridge & Malling	37	37	18	18
Tunbridge Wells	17	20	14	11
<b>West Kent GTAA</b>	<b>275</b>	<b>300</b>	<b>97</b>	<b>72</b>
<b>Sevenoaks/ Sevenoaks GTAA</b>	<b>82</b>	<b>89</b>	<b>19</b>	<b>12</b>
Dartford	45	50	22	17
Gravesham	13	21	12	4
Swale	48	53	28	23
Medway	14	14	30	30
<b>North Kent GTAA</b>	<b>120</b>	<b>138</b>	<b>92</b>	<b>74</b>
Canterbury	50	51	30	29
Dover	18	19	23	22
Shepway	1	1	12	12
Thanet	0	0	17	17
<b>East Kent GTAA</b>	<b>69</b>	<b>71</b>	<b>82</b>	<b>80</b>
<b>Kent &amp; Medway</b>	<b>546</b>	<b>598</b>	<b>290</b>	<b>238</b>

### Points for discussion

29. In considering the both the region's preferred option and the alternative approaches set out in this report Members may wish to consider the following:

- i. Whether the total pitch provision for Kent and Medway should allow for a degree of redistribution within the region and away from Kent. Kent authorities have expressed a preference for this at earlier stages of formulating the partial review and there is support for this in Government guidance,

experience from other regions and the balance of public response to the RPB's earlier consultation.

- ii. If redistribution is supported in principle whether the total additional pitch provision now proposed for Kent and Medway (290 pitches 2006-2016) is appropriate given the modest degree of redistribution to the rest of the South East that this represents (30 pitches) in comparison with a wholly needs based approach
- iii. If the degree of regional redistribution proposed under option D is deemed insufficient, whether that implied under a revised Option C ( 58 pitches ) is more in line with reducing the historic concentration in the Kent area. An approach based on the Option C total would still see Kent and Medway accommodating 25% of the total new provision proposed for the South East.
- iv. Whether a Kent and Medway total, that incorporates an element of regional redistribution, should incorporate a distribution within Kent that
  - o continues to be based solely on the pattern of need ( Options C1 and D1 follow this approach ) ; or
  - o reflects some redistribution away from areas where provision has been historically high <sup>5</sup> and where need is currently concentrated by taking account of local planning and sustainability criteria<sup>6</sup> in conjunction with the pattern of need (Options E (Revised) and F follow this approach; or
  - o whether the distribution should be based solely on that indicated by the pattern of local planning and sustainability criteria (the region's preferred option D and Option C (revised) follow this approach.
- v. Whether consensus can be established around pitch provision to be made in Kent and Medway as a whole, and optionally for GTAA study areas, with a view to further partnership working to secure delivery through Local Development document preparation. The Partial Review provides scope for this subject to confidence that such provisions will be secured.

30. The approach to provision for additional pitches both regionally and locally will ultimately be considered and tested before Planning Inspectors at an Examination in Public. Consistency and coherence of approach that reflects a collective view from partnerships of authorities is likely to have more force. Some regional redistribution of provision will be challenged in certain quarters and potentially compromised if areas such as Kent /Medway do not have a robust approach to this supported by a coherent approach to dealing with pitch allocations at a sub regional scale. A wholly 'bottom up' approach based on previously expressed preferences is most unlikely to hold sway if it falls substantially short of the current proposals for the Kent and Medway area as a whole. The likely consequence of this would be an alternative (and higher) distribution imposed through the Examination Panel.

## **Recommendation**

31. It is recommended that the Joint Members Steering Group:

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<sup>5</sup> Three districts in Kent ( Maidstone , Ashford and Sevenoaks have accounted for more than half (55%) of existing permanent residential pitches in Kent and Medway

<sup>6</sup> e.g. as originally developed in local authority advice to the region developed locally in the development of Option B

(i) note and consider the proposed level and distribution of additional Gypsy and Traveller pitch provision in Kent and Medway set out in the Partial Review submission (Option D) ;

(ii) review the case for, and terms of, a collective response to these proposals by the Kent authorities taking account of the considerations raised in paras 29 & 30 and the alternative approaches set out in Table 4;

(iii) in the light of (ii), determine whether a coordinated approach should be adopted by Kent authorities during the scrutiny and testing of the Partial Review proposals at the forthcoming Examination in Public.

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Strategy and Planning Division/ Gypsy and Traveller Unit:  
Kent County Council  
On behalf of the Kent Authorities RSS Review Officer Working Group

### **Background Documents**

Partial Review of the Regional Spatial Strategy for the South East: Provision for Gypsies, Travellers and Travelling Showpeople: Recommendations for new policy H7  
June 2009.

## APPENDIX 1 – THE REGION’S PREVIOUS CONSULTATION OPTIONS (2008)

### *SEERA Consultation (Sept – Nov 2008): Options A – D: Kent and Medway area*

<i>District/ GTAA area</i>	<i>Additional pitches</i>				
	<i>Option A</i>	<i>Option B</i>	<i>Option C</i>	<i>Option D</i>	<i>Range within A – D</i>
Ashford	20	32	28	30	12
Maidstone	48	39	32	36	16
Tonbridge & Malling	14	20	14	17	6
Tunbridge Wells	11	15	11	13	4
<b>West Kent GTAA</b>	<b>93</b>	<b>106</b>	<b>85</b>	<b>96</b>	<b>21</b>
<b>Sevenoaks/ Sevenoaks GTAA</b>	<b>57</b>	<b>22</b>	<b>14</b>	<b>18</b>	<b>43</b>
Dartford	33	27	17	22	16
Gravesham	16	13	10	11	6
Swale	64	31	20	25	44
Medway	12	32	24	28	20
<b>North Kent GTAA</b>	<b>125</b>	<b>103</b>	<b>71</b>	<b>86</b>	<b>54</b>
Canterbury	32	33	26	30	7
Dover	6	24	20	22	18
Shepway	2	13	9	12	11
Thanet	5	19	16	17	26
<b>East Kent GTAA</b>	<b>45</b>	<b>89</b>	<b>71</b>	<b>81</b>	<b>56</b>
<b>Kent &amp; Medway</b>	<b>320</b>	<b>320</b>	<b>241</b>	<b>281</b>	<b>79</b>

#### Option A

The needs assessments and Option A reflect the existing distribution of Gypsies and Travellers. Under this option additional provision of pitches would be relatively concentrated in three districts in Kent (Swale, Sevenoaks and Maidstone). They would account for more than half (53%) of the total county provision. However every district would make a contribution although this would be very modest in Dover, Shepway and Thanet reflecting the minimal evidenced presence of the Gypsy and Traveller communities in these areas.

#### Option B

Like Option A this option was based on data provided by the local authorities to the RPB. It has the same level of pitch provision as Option A (320 pitches) but this is redistributed within Kent on the basis of planning and environmental criteria including the incidence of Metropolitan Green Belt and national environmental constraints, the extent of urbanisation, housing land supply and commitments and accessibility to services. The effect is to redistribute pitch distribution more widely within Kent than that based solely on the GTAAs:

- towards parts of East Kent (Dover, Shepway, Thanet) Medway and Ashford; and
- in varying degrees away from districts with high need assessments (particularly Sevenoaks and Swale and to a lesser extent Maidstone).

### Options C and D.

These options were produced by the Regional Assembly in response to the request by Kent local authorities and other parts of the region that the Assembly should consider additional options providing for wider distribution of pitch provision across the region and which reduce the concentration of pitch provision in Kent provided for under Options A and B. Options C and D respectively retain 50% and 75% of the district level requirements under Option B with the balance re-apportioned across the region by equal weighting between two criteria:

- Land area free of major environmental constraints
- Forecast population at 2016 used as a general proxy for economic and social opportunities and access to employment and services.

Options C and D reduce overall provision in Kent and Medway in comparison with Options A and B. Option D numbers are higher than Option C given the smaller element of regional redistribution. The effects within Kent and Medway of Option C and D are variable:

- In North Kent provision is lower in all districts ( especially Swale ) but higher than Option A in Medway;
- In Sevenoaks the C and D options are substantially lower than Option A but vary only modestly from Option B;
- In West Kent the C and D options are lower than Option A in Maidstone but higher in Ashford and at a comparable level in Tonbridge and Malling and Tunbridge Wells ;
- In East Kent the C and D options are significantly higher than Option A in Dover, Shepway and Thanet and only marginally different from the Option B numbers; Canterbury's figures are very similar across all 4 options.

**APPENDIX 2 PARTIAL REVIEW PROPOSALS (OPTION D – COUNTY SHARES)**

	<b>2006 baseline</b>	<b>% of region</b>	<b>Submitted Option D requirement</b>	<b>% of region</b>	<b>% change</b>
Berkshire	214	11	77	7	36
Bucks and Milton Keynes	194	10	114	11	59
East Sussex	43	2	55	5	128
Hampshire and Isle of Wight	160	9	143	13	89
<b>Kent and Medway</b>	<b>546</b>	<b>29</b>	<b>290</b>	<b>27</b>	<b>53</b>
Oxfordshire	202	11	62	6	31
Surrey	336	18	146	14	44
West Sussex	173	9	177	17	102
SE REGION	1,868	100	1,064	100	59

**APPENDIX 3 Option E (as in KCC's representation to the Regional Assembly's consultation on options A to D in Autumn 2008).**

In essence Option E takes the Option A distribution as the starting point, retains the element of the 'pooled' regional requirement that is reappportioned to Kent (81 pitches) under Option C but distributes this within Kent on the basis on the distribution pattern of Option B which reflects the locally based planning and environmental criteria:

	<i><b>Additional pitches</b></i>
<i><b>District/ GTAA area</b></i>	
Ashford	18
Maidstone	34
Tonbridge & Malling	12
Tunbridge Wells	9
<b>West Kent GTAA</b>	<b>73</b>
<b>Sevenoaks/ Sevenoaks GTAA</b>	<b>34</b>
Dartford	23
Gravesham	12
Swale	40
Medway	14
<b>North Kent GTAA</b>	<b>89</b>
Canterbury	25
Dover	9
Shepway	4
Thanet	7
<b>East Kent GTAA</b>	<b>45</b>
<b>Kent &amp; Medway</b>	<b>241</b>