

**APPENDIX 4 TO ITEM 7 OF THE GYPSY AND TRAVELLER
ADVISORY BOARD – 22 JULY 2009**

ITEM 4b

RSS Partial Review: Gypsy and Traveller Accommodation

Joint Member Steering Group: 13th July 2009

Subject: South East Plan Review: Accommodation for Travelling Showpeople in the South East: Consultation on Proposals submitted to Government by the Regional Planning Body for the South East

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 Travelling Showpeople.

Introduction

1. The partial review of the RSS is also addressing the accommodation needs of Travelling Showpeople¹. In the Autumn 2008 consultation 3 options were presented regarding Showpeople:

- Option A based on the level of need identified in the local authority advice²
- Options C and D take Option A as a starting point but, as with gypsy and traveller pitches, they provided for different degrees of redistribution of provision in the region
 - Option C 50% pooled for regional redistribution
 - Option D 25% pooled for regional redistribution.

The responses of the Kent Districts and Medway Council to the Autumn 2008 consultation are summarised in Appendix 1.

2. Options C and D also included apportionment of an additional 42 families whose needs have not been accounted for in the area based needs assessments. The effect of this and the redistribution represented by Options C and D was to raise plot provision requirements in Kent and Medway to 23 – 30 plots (within a higher regional total of 276 plots).

3. The needs based assessment for Travelling Showpeople displays a rather different pattern to that for Gypsies and Travellers with the latter relatively concentrated in Kent and Surrey (47%) but with the former concentrated in Hampshire and Surrey (54% of the regional total).

¹ Defined in Planning Circular 04/2007 as "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 or permanently, but excludes Gypsies and Travellers as defined in ODPM Circular 1/2006."

² There is no Option B with regard to Travelling Showpeople.

4. The recommendations for new Policy H7 of the South East Plan propose 302 residential pitches for Travelling Showpeople in the region 2006-2016 against a current baseline of 431. Distribution would be based on Option D. For Kent and Medway this involves provision for 28 pitches (against a current baseline of 48). As with Gypsies and Travellers, the Option D figures for Kent and Medway have increased slightly (5 additional plots) since the Autumn 2008 consultation as a result of adjustments to the region's methodology for apportioning the element that is redistributed across the region and the higher regional total (302 pitches) now proposed.

Table 1 Net additional pitch provision

	2006 baseline	Consultation Options (Autumn 2008)				2009 Submitted Proposals Option (D)
		Option A (Need as arises)	42 families (allocation by C/D approach)	Option C (50% pooled + share of 42)	Option D (25% pooled + share of 42)	
Ashford	4	0	1	4	2	3
Maidstone	8	0	1	4	2	3
Tonbridge & Malling	3	0	1	1	1	1
Tunbridge Wells	0	0	0	1	1	1
West Kent GTAA	15	0	3	10	6	8
Sevenoaks/ Sevenoaks GTAA	1	0	0	1	1	1
Dartford	3	7	0	5	5	4
Gravesham	0	0	0	1	1	1
Swale	3	0	0	1	1	2
Medway	15	0	1	2	1	3
North Kent GTAA	21	7	1	9	8	10
Canterbury	10	2	1	4	3	4
Dover	0	0	1	3	2	2
Shepway	0	0	0	1	1	1
Thanet	1	1	1	2	2	2
East Kent GTAA	11	3	3	10	8	9
Kent & Medway	48	10	7	30	23	28

Note: There are some other minor differences between Option D as consulted on in 2008 and the current Option D. As explained in a footnote to SEERA's Planning Committee in January 2009, the original Dartford Showpeople allocation (under Option A) contained the entire post 2011 requirement for North and West Kent which was a product of the methodology used . The RPB has now reduced the Dartford allocation but this has some consequences for other North Kent authorities albeit that the numbers are very small.

5. In Kent and Medway needs assessment surveys for Travelling Showpeople were conducted in East Kent (as an integral part of the GTAA) and a separate, specific study for the remainder of the county. The latter, in particular, proved difficult, achieving a low response rate and the robustness of the data is therefore more questionable. The needs based assessments indicated a very modest level of need over the period to 2016 (10 plots within a regional total of 234).

6. The previous Option C and both the previous and current version of Option D involve higher provision in Kent than the needs based Option A and they include 7 of 42 households not covered in the local needs assessments. However if the principle of redistribution is endorsed in respect of provision for Gypsy and Travellers the same consideration should apply with regard to Travelling Showpeople. In the case of the latter redistribution serves to increase provision in Kent and Medway but involves only modest additional pitch numbers (18 pitches) over the level indicated by the needs assessment. The scale of redistribution into Kent for Showpeople pitches is marginally less than the redistribution from Kent under the comparable option for gypsies and travellers.

7. However there is no apparent, locationally based, needs assessment for the 42 homeless families included within the redistribution arrangements and this serves to increase provision that is redistributed in the region beyond the 25% provided for under Option D. Further understanding is required to understand the particular needs and circumstances of the 42 homeless families.

8. The proposed distribution is highly dispersed across the county (generally only 1-4 plots per district). As indicated in the report to the JMSG in November last year, this distribution is of questionable realism in terms of delivery. Showpeople normally form part of a travelling group and do not tend to be located in isolation. Under Option D many Districts, with no history of Showpeople present or wishing to resort to the area would be required to embark on a protracted process of making provision for just one or two plots for which there may be no demand. As the consultation document itself states, if redistribution is taken too far there is a potential, but unquantifiable risk, that some pitches provided would not be occupied, reducing overall sustainability benefits.

Conclusions

9. If the principle of redistribution is accepted for Gypsies and Travellers then it could be argued that, for similar reasons, the principle should also apply to accommodation for Travelling Showmen. However the effect of regional redistribution under Option D for Kent and Medway (and Option C) is much more pronounced in proportionate terms. In regional terms Kent /Medway has a relatively modest number of existing pitches and estimated need for additional pitches. This coupled with the relatively high concentration of existing pitches in certain other parts of the region (Hampshire, Surrey) means that the additional pitch requirement that is redistributed into Kent under Option D is disproportionately high in comparison with Option A (28 compared to 10 or 180%).

10. The approach taken to the 42 homeless Showpeople families in the region is also questionable. Even if this element were to be set aside, the remaining requirement for 21 pitches under Option D still represents double the number that would be required under the 'no redistribution' approach (Option A).

11. The evidence base on both need and the case for the level and manner of redistribution is considered less than satisfactory and on this basis the foundations of Option D are not strong.

Recommendation

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

(i) note and consider the proposed level and distribution of additional Travelling Showpeople 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 taking account of the concerns raised in paras 5 to 11;

(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.

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

Kent Authorities Responses to Autumn 2008 Consultation: Travelling Showpeople

<i>District/ GTAA area</i>	<i>Preferred option</i>	<i>Pitches</i>
Ashford	A	0
Maidstone	A	0
Tonbridge & Malling	*	?
Tunbridge Wells	A	0
Sevenoaks	C	1
Dartford	C/D ^{\$}	5
Gravesham	A	1
Swale	A	0
Medway	#	-
Canterbury	A	2
Dover	A	0
Shepway	A	0
Thanet	A	1
(Kent and Medway)		(10?)
Regional Option A for Kent/Medway		10
Regional Option C for Kent/Medway		30
Regional Option D for Kent/Medway		23

* = T&M BC requested the matter of homeless Travelling Showpeople should be referred back to SEERA and the Guild of Travelling Showpeople as the Council did not accept the distribution of single pitches across the region.

^{\$} = Dartford BC objected to the methodology used to calculate the Option A figures requesting the additional pitches arising from natural growth of the existing travelling Showpeople population should be apportioned according to the current distribution of pitches throughout the sub-region. Following this re-apportionment, Options C and D should be changed accordingly (see note at foot of Table 1 in main report).

= Medway Council was of the view that '*insufficient evidence exists to justify a specific requirement for additional pitches in Medway*'