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Date 26th January 2016

Steve Quartermain, CBE
Chief Planner
Department for Communities and Local Government
Eland House
Bressenden Place
LONDON
SW1E 5DU

Dear Mr Quartermain

Re. Implications for Local Plan Preparation following Amendments to the Planning Policy for Traveller Sites (PPTS)

The Kent Planning Officer's Group (KPOG) represents the Lead Planning Officers from all the Kent Districts, Kent County Council and also Medway Unitary Authority. As you will be aware all Kent and Medway Local Planning Authorities are at various stages of Plan making, progressing towards new Local Plans in accordance with the National Planning Policy Framework and Practice Guidance.

The amendments to the PPTS in August have raised a number of issues for Local Planning Authorities and we as a Group wish to seek a view on how best to progress Local Plans in this transitory period. The Group's greatest concern is the robustness of the evidence for assessing future need for Gypsy and Traveller accommodation in the light of the new planning definition.

The interviews that were conducted with various Gypsy and Travellers that underpinned the current round of Gypsy and Traveller Accommodation Assessments (GTAA's) do not fully reflect the new definition in respect of determining whether Gypsy and Traveller communities in Kent and Medway can demonstrate a nomadic lifestyle. We presume that this particular point may well be the same for a number of other Local Planning Authorities across the country. Most of the GTAA's prepared for Kent Districts in recent years were carried out by Salford University.

This places us in a difficult position. If our GTAA's are now effectively out of date we should revise them in the light of new guidance reflecting the amendments to the PPTS. However, there is currently no indication of when new guidance might be forthcoming.

We have been advised by the Planning Inspectorate that policies and land allocations for meeting the needs of Gypsies and Travellers should be included in Local Plans, rather than be dealt with separately in the form of a Development Plan Document, but to do so could delay Local Plans if we are to wait for new guidance. The Government has also recently announced that Local Planning Authorities should have up-to-date Local Plans in place by early 2017.

Following a meeting between the Kent LPAs and Dr Philip Brown of Salford University on the 23rd October, it was agreed that the anonymised responses to the original survey questionnaires would be provided to the Districts so that they may revisit them and draw their own conclusions in determining future need in the light of the revised Traveller definition PPTS.

Swale Borough Council has revised their GTAA in this way and this was considered recently at the Local Plan Hearing on the 26th November. The Inspector felt that in the absence of revised guidance on preparing GTAAs that the Council had made 'a good stab' at interpreting the new PPTS. Her report is anticipated early in 2016.

Urgent clarification is therefore sought from the DCLG on whether Local Planning Authorities can reasonably:

- Adopt a similar approach to that used by Swale Borough Council;
- Proceed with their current GTAAs, but assume the current need assessment is a maximum (assuming that the need may be lower under the new definition?) on the understanding that this will be addressed as part of an early review. This runs the risk of challenge at Examination as the evidence will not fully reflect the revised PPTS; or
- Proceed with their Local Plans, but address Gypsy and Traveller issues through a separate Development Plan Document when the new guidance is made available

The alternative would be that Local Planning Authorities would have to wait for the publication of new guidance before GTAAs can be revised and this would cause significant delays in the Local Plan making process, which in our view would be unacceptable.

We urge you to consider publishing short term advice to assist Local Planning Authorities already facing challenging Local Plan timescales and would encourage you to give us realistic options that will allow us to progress Local plans and deliver planned sustained growth and housing in our Districts.

I look forward to receiving your response,

Yours Sincerely,

Simon Thomas
Chair of the Kent Planning Officers Group
(Head of Planning, Canterbury City Council)

Simon

Further to your letter of 26 January to Steve Quartermain, I apologise that you have not received a response to your letter earlier from the Department.

I have recently taken over responsibility for the planning policy for Gypsy and Travellers, which is an additional planning policy area added to my existing portfolio.

I can confirm that we are working towards publishing:

- **Guidance to local housing authorities on the periodical review of housing needs – Caravans and Houseboats**

on Tuesday 12 July.

We are just finalising the final version of the guidance, its publication will answer the questions which you have raised on behalf of the Kent Planning Officers Group.

Please see my contact details below, if you wish to discuss further.

Once again, apologies for the delay in responding to your letter.

Best wishes,

Eamon