The following is a response to:

- The ‘Inspector’s Matters, Issues & Questions’ (Issue 2.5)
- The subsequent release of the new national ‘Planning Policy for Travellers Sites’

Background – Shepway history
1. Official statistics [S17] show that over recent years, gypsy and traveller caravan counts in Shepway total (authorised and unauthorised) as follows:

   - July 2008 = 0
   - Jan 2009 = 0
   - July 2009 = 0
   - Jan 2010 = 4
   - July 2010 = 5

2. This is part of a long-term tendency of what is, relatively, very limited local need. For historical and geographical reasons, Shepway has had a consistently low incidence of Gypsies and Travellers.

3. The following details all associated planning applications in Shepway in the last 20 years:
   - Lydd Caravan Park: KCC site with permission granted for 14 gypsy caravans in 1984. The site was closed and sold by KCC and then used for other purposes until approximately 2006 when the new owner started putting caravans on the site. Some of the caravans may be occupied by gypsy and traveller families.
   - Former Quarry, Canterbury Road, Folkestone: permission for 22 pitches 1983. (This site is not used as a caravan site).
   - Adjacent to Poplar Farm, Brenzett Green: 1 pitch refused in 1997 and 1998.
Adjacent to Rose Cottage, Brenzett: site for 1 family approved in 2010 and now occupied.

Disused Sandpit, Blind House Lane, Monks Horton, planning permission to provide a travelling showpersons site for one family was granted in 2009. This permission is currently unimplemented.

It can be seen on this basis also, demand has been low throughout the long-term.

4. Extensive consideration has been given to Gypsy and Traveller needs in the region as part of the (incomplete) South East Plan partial review [CS EiP document S18] which included Examination in Public. Kent is considered in chapter 6 of the unfinished draft Panel Report. The council notes that in all possible local need options, as tabulated in this chapter, Shepway has consistently the lowest need in the county.\(^1\)

5. The draft Panel report notes that councils in East Kent have taken an evidence-led (GTAA) approach [S18 para 6.58]. It found that the East Kent evidence of need was regarded regionally (through benchmarking) to be “generally robust” [S18 para 6.48]. It is therefore considered sound to apply the GTAA in Shepway, and it is accordingly used in the rest of this statement.

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\(^1\) As well as need, the draft Panel Report also considered environmental issues in relation to capacity and acknowledged that Shepway’s rural area has extensive constraints both to the north and south (para. 6.66) that are relevant.
Paragraph 9 of National Planning Policy for Travellers Site (March 2012)
6. The key requirements of this relate to the need to plan for sites to meet local targets. Local targets were considered in The East Kent Gypsy and Traveller Accommodation Assessment (2007-12) [A7]. This informed the South East Plan review and identified a need for two pitches and zero transit caravan capacity to 2012. This requirement for Shepway is out of an East Kent total of 31 for the period, with a sub-regional total need of 19 found for the following five-year period. If the 2012-2017 need is apportioned as before, the total requirement for Shepway would be approximately 1 pitch.²

7. Identification of site(s) will be undertaken as part of the site allocations DPD process based on evidence of need. Specific site(s) will be allocated in accordance with national policy, evidence of need and the Core Strategy. An update will be undertaken as part of the Annual Monitoring Report process.

8. Updating of evidence in accordance with national policy will be discussed, alongside the option of a joint DPD, with partner councils; a vehicle exists for this - the East Kent Regeneration Board.

9. These provisions fulfil the requirements as set out in paragraph 9 of national policy.

Paragraph 10 of National Planning Policy for Travellers Site (March 2012)
10. It is not considered appropriate in the Core Strategy to include specific criteria to guide future land supply allocations for gypsy and traveller sites. This is not a strategic issue in Shepway and there is currently no significant unmet need based on existing evidence. Criteria based policy for development management decisions will be considered as part of the DPD for Development Management.

Paragraph 11 of National Planning Policy for Travellers Site (March 2012)
11. The remainder of national policy applicable for development plans focuses on site assessment factors. These will form the basis of the site selection criteria when producing the allocations DPD and criteria based policy when producing a Development Management DPD.

² (2/31)x19=1.1.875
12. Nevertheless it should be noted that several CS policies apply to all developments. CSD2 recognises the need to meet “the specific requirements of vulnerable or excluded groups”. Criteria in SS1 and SS3 are appropriate strategic criteria that apply to gypsy and traveller proposals as well as other uses. This integrated approach accords with the principles at the heart of national policy: “fair and equal treatment” (paragraph 3).

Conclusion

13. The position above explains the requirements that local planning authorities should meet in producing their local plans and how the council intends to ensure those requirements are met. It is considered the overall context of need is important.

14. The Shepway LDF Core Strategy (CS) was prepared during a period when national planning policy in relation to gypsy and travellers was under review. In response to the Inspector’s issue 2.5 and associated questions - and following the publication of ‘Planning Policy for Travellers Sites’ in March 2012 - the council accepts some CS modifications may be required, but does not consider local circumstances mean this is generally a strategic issue of Shepway.

15. It is considered (1) the CS can provide a suitable framework for the location of sites in line with national policy, and (2) the way forward for meeting local needs is clear and satisfactory.