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Dear Mr McCormack and Mr Hendley

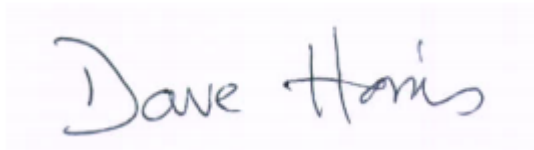
**MEDWAY COUNCIL'S RESPONSE TO THE INSPECTORS' INITIAL QUERIES LETTER
(MLP/ED5) – GYPSY, TRAVELLER AND TRAVELLING SHOWPEOPLE NOTE**

Thank you for your letter dated 27 March 2026 (ref: MLP/ED5).

Further to my letter dated 8 May 2026 (ref: MLP/ED7), please find attached a Gypsy, Traveller and Travelling Showpeople Note for your consideration.

I look forward to hearing from you in due course.

Yours sincerely



Dave Harris
Chief Planning Officer

Medway Local Plan Examination

Medway Council Response to Inspectors' initial queries – Gypsy, Traveller and Travelling Showpeople

25. The Plan recognises there will be a need during the Plan period for further pitches/plots for Gypsy and Traveller households and for Travelling Showpeople. However, it does not seek to allocate sites but rather rely on a criteria-based policy (T10). We have a number of initial queries and have some concerns about the soundness of this approach, as set out below. Again, we are seeking the Council's response at this stage through a topic-specific note.

The Council submitted a 'Gypsy and Traveller Accommodation Topic Paper' (ref: B.22.7). We provide an updated position and further clarification in response to the initial queries in this note.

26. There appears to be discrepancies in the level of need identified between the Gypsy and Traveller Accommodation Assessment (GTAA) (ref: B11.1) and Addendum (ref: B11.2), and Policy T10, based on the interpretation of the definitions under the Planning Policy for Traveller Sites (2024) (PPTS). The GTAA and Addendum identify a total need for 56 Gypsy and Traveller households, and 8 for Travelling Showpeople. Yet, paragraph 6.10.7 of the Plan states there is a need for 31 pitches for Gypsy and Traveller households and 3 for Travelling Showpeople. These apparent discrepancies should be explained.

The GTAA Addendum, 2024 (ref: B11.2) sets out the identified needs, based on the interpretation of the definitions in the 2024 PPTS. This is the accurate and updated level of need. The information is drawn from the detailed GTAA report of 2024 (ref: B11.1) applying the updated definition.

The reference at paragraph 6.10.7 of the Plan refers to superseded evidence, and the Council propose a minor modification to the plan to correct this inconsistency.

27. The Council should also explain why it considers its approach accords with the PPTS. This includes criterion a) of paragraph 10 over whether under the Plan there is in fact a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against locally set targets. Similarly, under criterion b) over developable sites, or broad locations for growth over the remainder of the Plan period, and paragraph 11 over what criteria the Council has set to guide land supply allocations where there is identified need.

Identified Needs and Monitoring of Supply

The baseline for the evidence on identifying needs for Gypsy, Traveller and Travelling Showpeople set out in the GTAA (ref: B11.2) is February 2024.

There was an identified need for:

	2022-2041	First 5 years (2026-2031)
Gypsy and Traveller Households	56 pitches	43 pitches
Travelling Showpeople	8 plots	5 plots

Since the baseline of the GTAA, supply has been increased through consented developments:

Planning Reference	Number of Pitches
MC/22/1215	2
MC/23/2423	1
MC/25/1099	4
MC/24/2334	3
MC/24/2526	3
MC/25/0937	8
APP/A2280/W/25/3358815	5
Total	26

This indicates that the supply from planning applications has made a significant contribution to meeting needs – over 46% of the needs over the Plan period, and 60% of the first five-year requirement for gypsy and traveller households.

The residual need to be addressed in the plan is now:

	2022-2041	First 5 years (2026-2031)
Gypsy and Traveller Households	30 pitches	17 pitches
Travelling Showpeople	8 plots	5 plots

Meeting the Needs for Gypsy, Traveller and Travelling Showpeople households

The Council has identified criteria for new and expanded traveller sites in Policy T10, which reflect paragraph 11 of the PPTS, but did not provide any allocations for new sites in the Plan. This reflects the lack of sites that were identified as suitable, available and deliverable as development allocations in the Plan.

The Council proposes further actions to identify deliverable sites for the first five years of the plan, and developable sites for years 6-10, which will be proposed as main modifications to the Plan. This will address PPTS paragraphs 10 (a) and 10 (b). 90% of the identified need for Gypsy and Traveller households and 88% of the need for Travelling Showpeople is in the first 10 years of the plan. The Council will also use a criteria-based policy to assess windfall applications.

The Council will review sites in its ownership with the objective of identifying deliverable and developable sites for the first 10 years of the plan and main modifications will be proposed to allocate sufficient sites.

If the review of Council owned land does not allow sufficient deliverable and developable sites to be identified to cover years 1-10, the use of compulsory purchase powers will be considered.

In addition, with the agreement of the Inspectors, the Council proposes to run a further Call for Sites exercise to identify the availability of any wider land for assessment for its suitability for Gypsy and Traveller and Travelling Showpeople's use. The Council can set up the Call for Sites within a week of agreement by the Inspectors to this approach.

The Council will engage with the Traveller Showpeople's community to re-assess the existing site to confirm its capacity to accommodate additional plots to meet the identified needs and propose a modification to the policies map showing the allocation for this specific use.

Identification of further capacity on council owned land

The Council is taking a corporate approach to boost the supply of pitches and plots to provide certainty on meeting needs. There is coordinated work across the Planning, Housing and Property Services. A report is to be presented to the Council's Cabinet in Summer 2026. The report will present options for the use of Council owned land to increase provision for Gypsy and Traveller households in Medway. This will include consideration of opportunities to expand or increase capacity of the Council's public site. Subject to detailed review of those identified opportunities, the Council will look to allocate the identified Council owned land through main modifications.

Consideration of compulsory purchase to secure sites for Gypsy and Traveller use

Through its work on enforcement, the Council has identified land suitable for Gypsy and Traveller accommodation that is being used for wider residential needs. It will explore options to secure such land for the specific needs of Gypsy and Traveller communities. This may provide supply for later in the plan period.

Review of potential for modifications to plan to include provision on strategic sites development allocations

The Council will assess the potential for including land in strategic development allocations for Gypsy, Traveller and Travelling Showpeople as part of the wider land uses. This will use the criteria set in Policy T10, to assess site specific characteristics for suitability, viability and deliverability. This work will be carried out concurrently with the Call for Sites exercise and the preparation of the Cabinet report on the options for Council owned land. Should suitable land be identified as available and deliverable, the Council would propose modifications to the Plan.

28. The Plan relies on the intensification and expansion of sites to meet need through the policy. It is highly likely that we will have questions on whether such an approach is consistent with national policy through the PPTS, as well as on the methodology and recommendations of the GTAA and Addendum. While paragraph 11 of the PPTS goes on to allow for a criteria-based policy approach, this is where there is no identified need, and so the Council should explain its position in this regard. Notwithstanding this, please also explain why there are not the related allocations showing extensions of existing sites.

Much of the identified need arises from families on existing sites. The Council's GTAA consultant and Planning officers have identified that some current sites have potential for reconfiguration to increase capacity. This will include a review of the existing Travelling Showpersons yard, where the identified needs are from estimated new household formation.

The Council will progress discussions and collaborate on site assessments. Where suitable, sites with capacity for intensification and/or expansion will be identified and proposed as modifications to the Plan policies map. The Council proposes a main modification to the Plan map to clarify sites and areas for expansion or intensification.

29. There is also a need to explain whether the SA (ref: A3.1 to A3.3) has considered the need when it has discounted the site at Cuxton (CHR13), and why it did not consider two other Gypsy and Traveller sites identified in the Land Availability Assessment (ref: B1) at Upnor (SR32) and Chattenden (SR41). If the Council did not consider that suitable sites had come forward for Gypsy and Traveller, and Travelling

Showpeople, the Council is asked to explain why a separate call for sites exercise was not undertaken due to the identified need.

SR41 and SR32 were assessed as non-strategic reasonable alternative sites in the Sustainability Appraisal (ref: A3.3) of the Plan. They were rejected (Table J.1.1) on environmental grounds, including the proximity to a SSSI and landscape impacts, and poor access to services. SR32 is situated in a sensitive landscape, adjacent to the Tower Hill to Cockham Wood SSSI. SR41 is a constrained site surrounded by the Chattenden Woods and Lodge Hill SSSI.

The Gypsy and Traveller Accommodation Topic Paper (ref: B.22.7) refers to the Council's work through iterative Call for Sites processes to identify land available for Gypsy, Traveller and Travelling Showpeople accommodation, and that this had been unsuccessful in securing suitable sites to meet needs. In preparing the Draft Plan, based on the outcomes of earlier Call for Sites, which sought land for Gypsy, Traveller and Travelling Showpeople uses, the Council did not view that a further Call for Sites exercise would be successful in identifying further sites. A number of sites were being consented through development management, as noted above, rather than being promoted through the Plan.

Notwithstanding the limited responses to earlier Calls for Sites, the Council propose to conduct a further Call for Sites solely for Gypsy, Traveller and Travelling Showpeople uses, seeking the support of specific communities and their representatives. Subject to the agreement of the Inspectors, a six-week consultation could run concurrently with proposed consultation on supporting documents submitted with the Plan. The outcomes would be available before Hearing Sessions.

These actions will inform a coordinated response on Gypsy, Traveller and Travelling Showpeople to the Examination.