



Louise St John Howe
PO Services, Unit 162298
PO Box 7169
Poole
Dorset
BH15 9EL

By email only

Planning Service
Culture and Community
Regeneration, Culture and Environment
Medway Council
Gun Wharf
Dock Road
Chatham
Kent
ME4 4TR
Telephone: 01634 306000

31 July 2026

Dear Mr McCormack and Mr Hendley

MEDWAY COUNCIL'S RESPONSE TO THE INSPECTORS' NEXT STEPS (MLP/ED9)

Further to my letter (ref: MLP/ED10), please find attached document concerning Gypsy, Traveller and Travelling Showpeople accommodation sites. The document sets out the Council's actions to address the needs for Gypsy, Traveller and Travelling Showpeople.

The Council issued a 'call for sites', specifically for Gypsy, Traveller and Travelling Showpeople accommodation sites, between 8 June 2026 and 20 July 2026. The Council received no submission sites.

In June and July 2026, planning officers carried out an assessment of sites in the Council's ownership to identify deliverable and developable sites for the first 10 years of the Plan. The assessment found one site that is considered suitable, available and achievable. Subject to the outcome of a Cabinet meeting on 4 August 2026, the site could be allocated in a suggested main modification to the Medway Local Plan 2041.

The Council's planning officers consider that consented sites have space for more pitches. Consented sites could also be allocated in suggested main modifications to the Medway Local Plan 2041. The Council will determine the capacity of these sites in advance of the Phase 2 hearings.

I welcome your Guidance Note (ref: MLP/ED13), Draft Hearing Programme (ref: MLP/ED14) and Schedule of Matters, Issues and Questions for the Phase 1 hearings (ref: MLP/ED15).

Yours sincerely

A black rectangular box redacting the signature of Dave Harris.

Dave Harris
Chief Planning Officer

Gypsy, Traveller and Travelling Showpeople Accommodation Sites

Medway Council

July 2026

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1 Introduction

1.1 Purpose

- 1.1.1 Following correspondence between the Inspectors appointed to examine the Medway Local Plan 2041 and the Council (ref: MLP/ED10), the purpose of this document is to set out the Council's actions to address the needs for Gypsy, Traveller and Travelling Showpeople.

2 Call for Sites

2.1 Call for Sites 2022

- 2.1.1 The Council issued a 'call for sites' between 18 November 2022 and 28 February 2023. The call for sites was for all land uses.
- 2.1.2 The Council received three submission sites proposed for Gypsy, Traveller and Travelling Showpeople pitches/plots: CHR13, SR32, SR41.
- 2.1.3 All three sites were deemed unsuitable Land Availability Assessment (ref: B1, Appendix E). The reasons for rejection for allocation were set out in the Sustainability Appraisal (Volume 3, Appendix J).

2.2 Call for Sites 2026

- 2.2.1 The Council issued a 'call for sites', specifically for Gypsy, Traveller and Travelling Showpeople accommodation sites, between 8 June 2026 and 20 July 2026. The notice of the 'call for sites' was publicised with developers, land owners, consultees and wider stakeholders through use of the database of contacts developed for the local plan. A Council member assisted in promoting the Call for Sites to contacts with links into Gypsy and Traveller communities. The Council received no submission sites.
- 2.2.2 The Council received no submission sites, and the Council member's approach also received no follow up on suggested sites.
- 2.2.3 The Council member liaised with the Planning Service to review council owned land and he made a number of suggestions for further review of sites. The sites were located in the Capstone Valley area, High Halstow, Cuxton, Luton, Lower Rainham bordering the estuary and Rochester. The sites were included in the assessment carried out by Planning officers. Most of the sites were removed in the earlier stages of assessment due to conflict with screening criteria, particularly protected open space and environmental designations. Other sites were included in the later stages of assessment.

3 Review of sites in the Council's ownership

3.1 Overview

- 3.1.1 In June and July 2026, planning officers carried out a review of sites in the Council's ownership with the objective of identifying deliverable and developable sites for the first 10 years of the Plan. This work will be reported to the Council's Cabinet on 4 August 2026.

3.2 Site identification and screening

- 3.2.1 Planning officers used the latest Land Registry spatial data in a Geographic Information System to identify land in the Council's ownership.
- 3.2.2 The Council reviewed practice in other Local Planning Authorities to inform its methodology. A recent call for sites by the South Downs National Park Authority considered minimum site sizes:
- A pitch for a single Gypsy or Traveller family will be **around 500 sqm**. This should provide enough space for a residential and touring caravan as well as an amenity block and parking spaces on site. Smaller sites will also be considered. Where large sites are submitted, we would look for five pitches with expansion potential to a maximum of ten pitches.*
- A plot for a Travelling Showperson will be much larger and will need to include storage and maintenance space for their show equipment as well as residential accommodation. A single plot would be expected to be **0.5 hectares** but could be smaller if that meets the needs of the individual.¹*
- 3.2.3 Having discounted 1,176 sites that are smaller than 400 sqm, 978 sites remained for assessment. A map showing all 978 sites identified is presented at Appendix A.

3.3 Assessment

- 3.3.1 The next stage comprised an assessment as to the suitability, availability and achievability of each site.
- 3.3.2 Policy B (paragraph 13) of the national 'Planning Policy for Traveller Sites' (December 2024)² provides a basis for a desktop assessment of suitability. The following designations and areas were considered:
- Habitats sites
 - Ancient Woodland
 - Sites of Special Scientific Interest
 - National Nature Reserves
 - Local Nature Reserves

¹ <https://www.southdowns.gov.uk/planning-policy/new-south-downs-local-plan/evidence-base/homes-and-economy/land-availability-assessment/gypsy-traveller-travelling-showpeople-accommodation-sites/faqs-gypsy-traveller-travelling-showpeople-accommodation-sites/>

² <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites/planning-policy-for-traveller-sites>

- Flooding from rivers and sea (Flood Zones 2 & 3)
 - Green space
 - Green Belt
 - Air Quality Management Area (within 25m)
 - Existing waste management facilities (within 100m)
- 3.3.3 A map showing all 978 sites identified, along with a composite layer of these designations and areas, is presented at Appendix B.
- 3.3.4 Sites intersecting with these designations were discounted, leaving 423 sites requiring a planning officer's desktop review to consider:
- Potential access arrangements
 - Potential adverse impacts on residential amenity
 - Existing land use of the site itself
 - Compatibility with adjacent land use
 - Presence of dense vegetation
 - Topography
- 3.3.5 A map showing all 423 sites is presented at Appendix C. Most of these sites were schools, highways or public realm.
- 3.3.6 Nineteen sites were identified as potentially suitable, requiring a detailed assessment by Council officers according to the criteria in Policy T10: Gypsy, Travellers & Travelling Showpeople.
- 3.3.7 A site was considered available for development when, based on the best information, there is confidence no legal or ownership barriers exist.
- 3.3.8 The assessment of achievability is a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period.
- 3.3.9 A map showing all of the 19 sites is presented at Appendix D. Maps at a larger scale of each site are presented at Appendix E. A table of Council officers' comments is presented at Appendix F.
- 3.3.10 The assessment found one site (Land Registry Title K746571) that is considered suitable, available and achievable. The eastern area of the site, a former 'park and ride', was granted planning permission (MC/24/1038) on appeal (APP/A2280/W/25/3358815 - retrospective material change of use of land for use as gypsy traveller site). The remaining area of the site comprises a paddock, which could provide for expansion. Subject to the outcome of a Cabinet meeting on 4 August 2026, the site could be allocated in a suggested main modification to the Medway Local Plan 2041. The published Cabinet report is presented at Appendix G.

4 Assessing the potential for including land in strategic development allocations

4.1 Engagement with developers and landowners

- 4.1.1 The Council has continued to engage with developers and landowners promoting development in the Medway Local Plan 2041, particularly in strategic allocations, to provide greater certainty on delivery. The strategic locations include brownfield regeneration in urban centres and waterfront sites. These were not seen as suitable to incorporate new sites for Gypsy and Traveller uses.
- 4.1.2 The wider strategic allocations also direct development to suburban and rural locations. The Council is promoting comprehensive landscape-led masterplanning of these greenfield sites to deliver homes and infrastructure, that responds positively to the environmental setting. In discussions with developers and landowners in these strategic sites, concerns have been raised about viability and impacts on integrating use for Gypsy and Traveller pitches in large scale 'bricks and mortar' developments.
- 4.1.3 Given the position of the developers and landowners, the Council has concerns that allocations for Gypsy and Traveller pitches on strategic sites would not be achievable. We understand that this may be a matter for further consideration at the Examination hearings.

5 Safeguarding Existing Sites and Consented Sites

5.1 Safeguarding Existing Sites

- 5.1.1 Policy T10 of the Medway Local Plan 2041 safeguards all authorised³ Gypsy, Traveller and Travelling Showpeople sites over the plan period and sets out criteria for any expansion.

5.2 Consented Sites

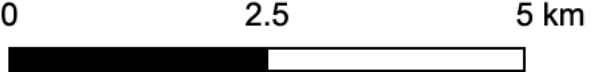
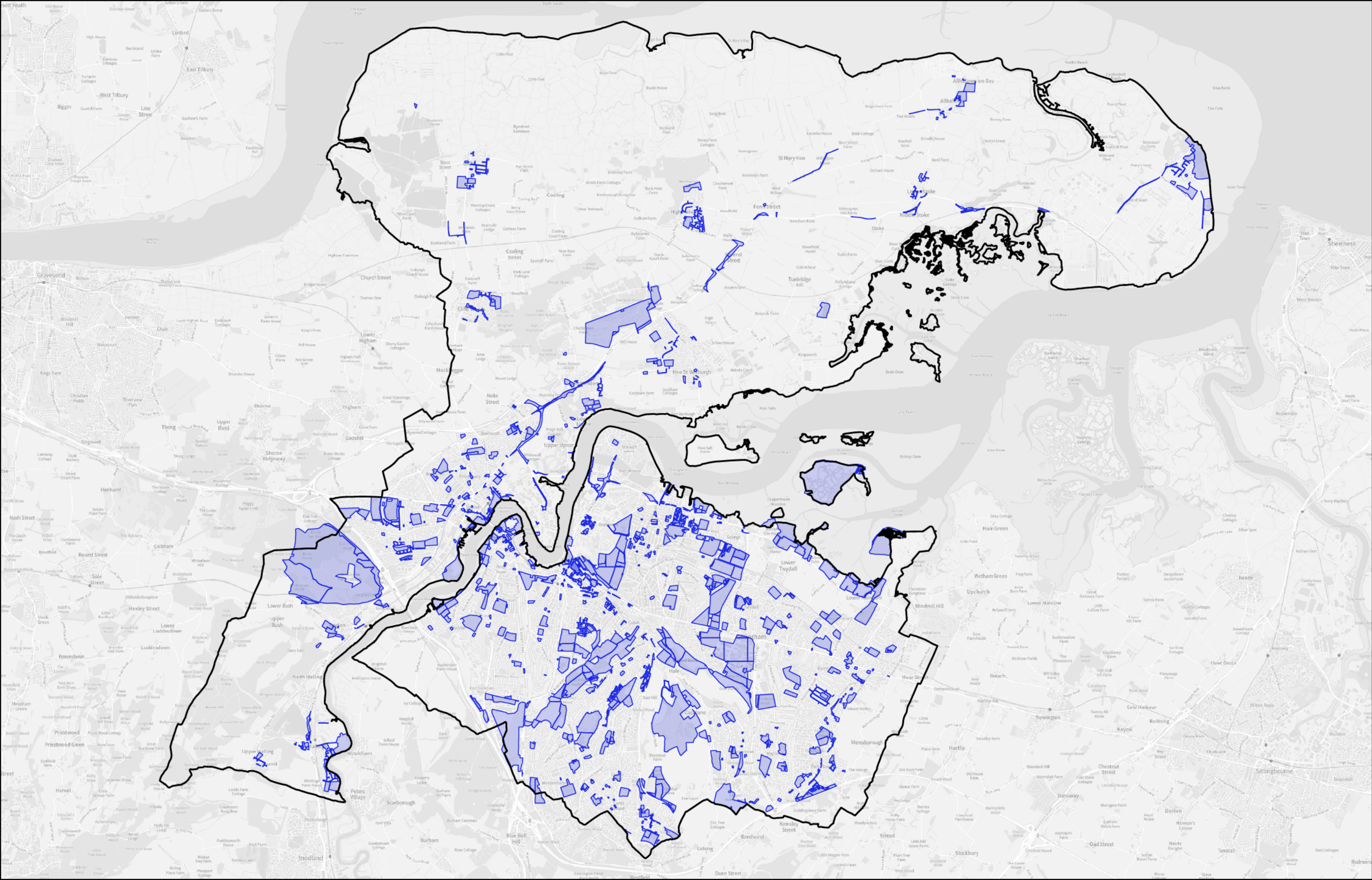
- 5.2.1 The Council's planning officers consider that at least two consented sites (MC/24/2526 and MC/25/0937) are not yet fully occupied, while other consented sites have space for more pitches. Allocating consented sites would help to secure some additional supply, and meet extended family need.
- 5.2.2 Consented sites could be allocated in suggested main modifications to the Medway Local Plan 2041. The Council will determine the capacity of these sites for the Phase 2 hearings.

³ For the purposes of this Policy, authorised gypsy and traveller and travelling showpeople sites means those with planning permission that are not subject to a condition limiting them to a temporary period or a specified person(s).

Appendix A

A map showing all 978 sites identified

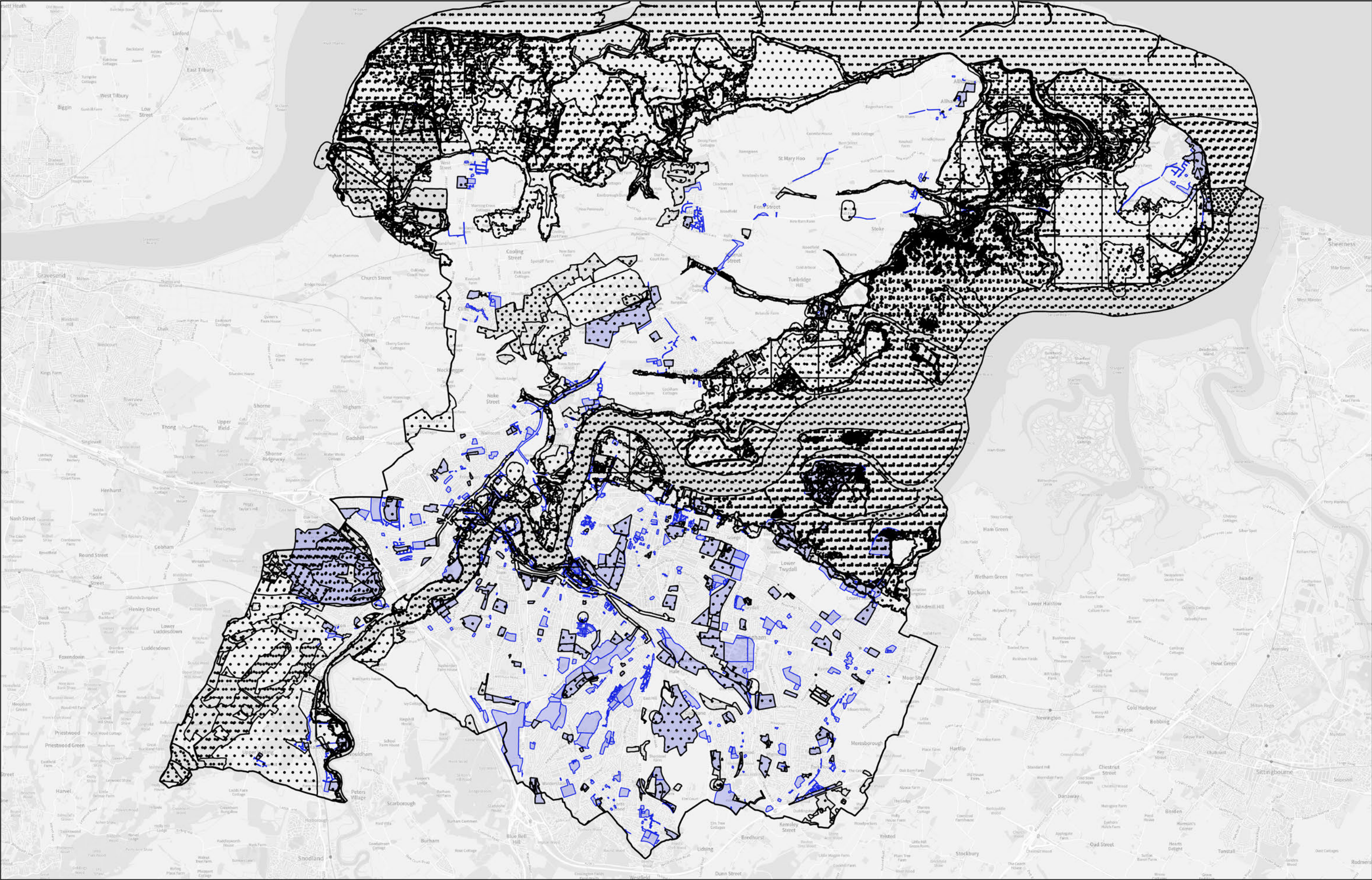
Site Identification & Screening



Appendix B

A map showing all 978 sites identified, along with a composite layer of constraints

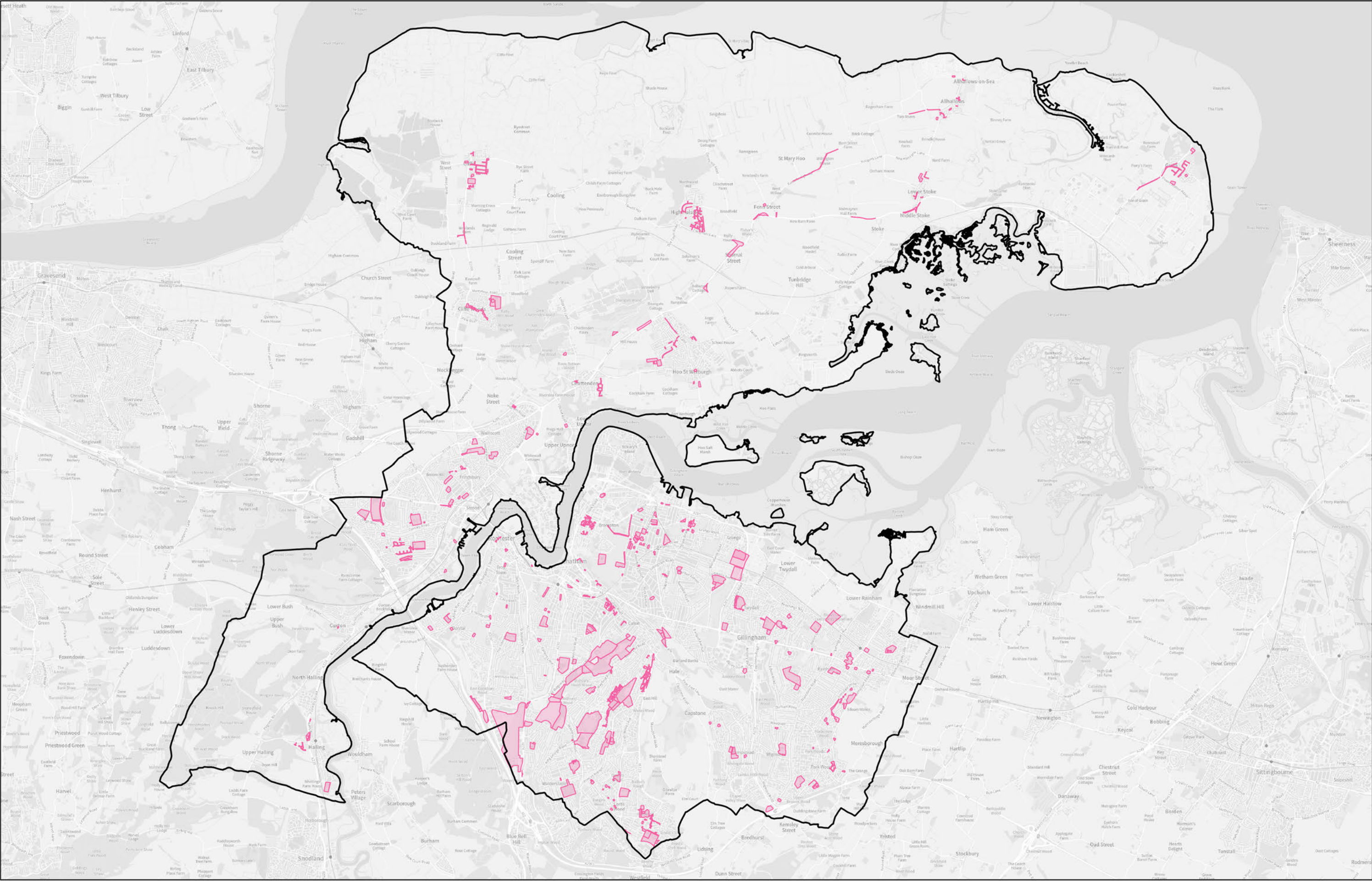
Composite Constraints



Appendix C

A map showing all 423 sites subject to a planning officer's desktop review

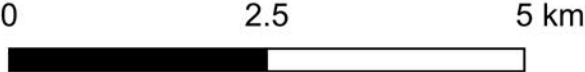
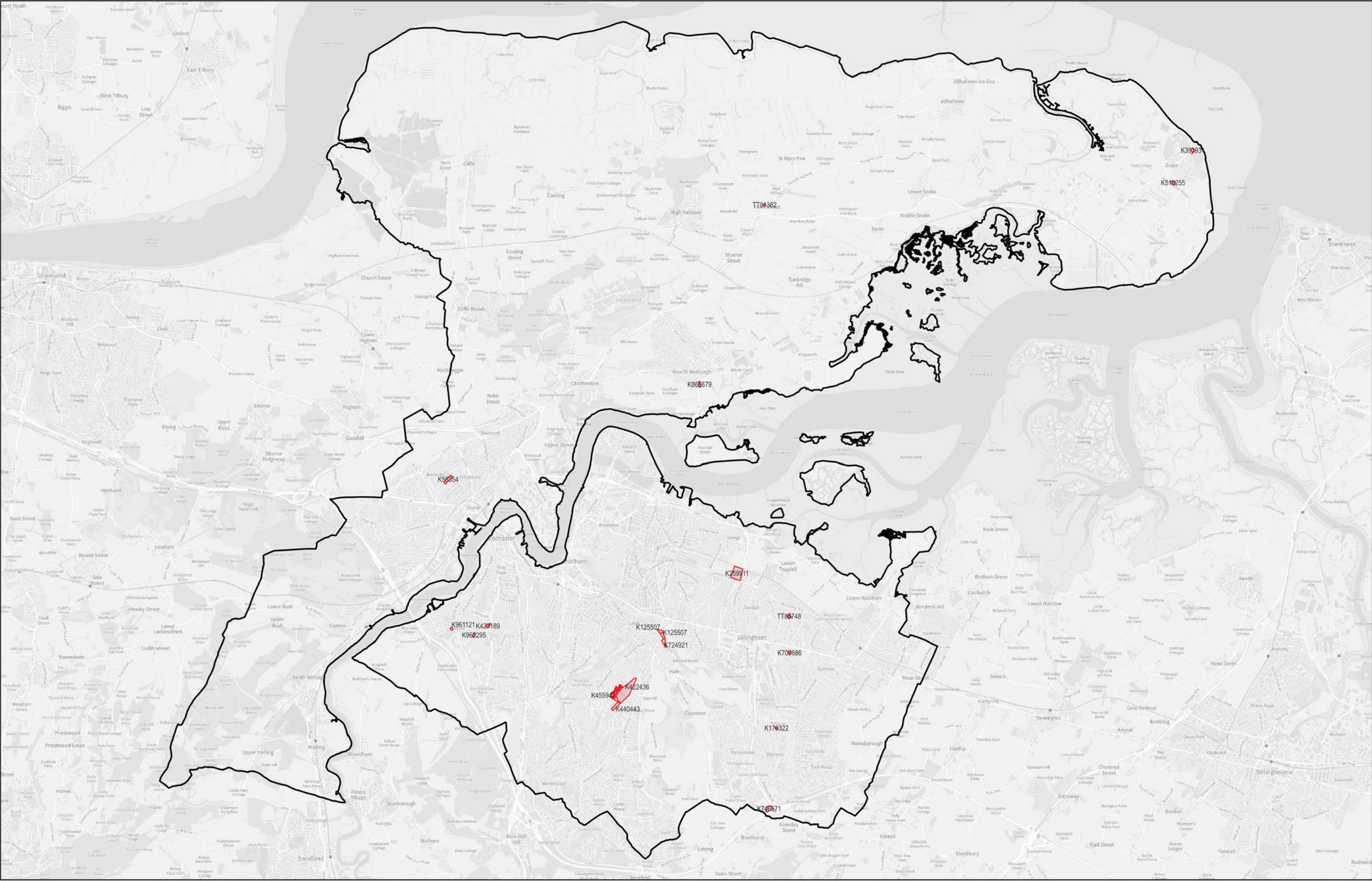
Desktop Review



Appendix D

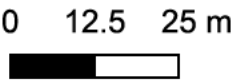
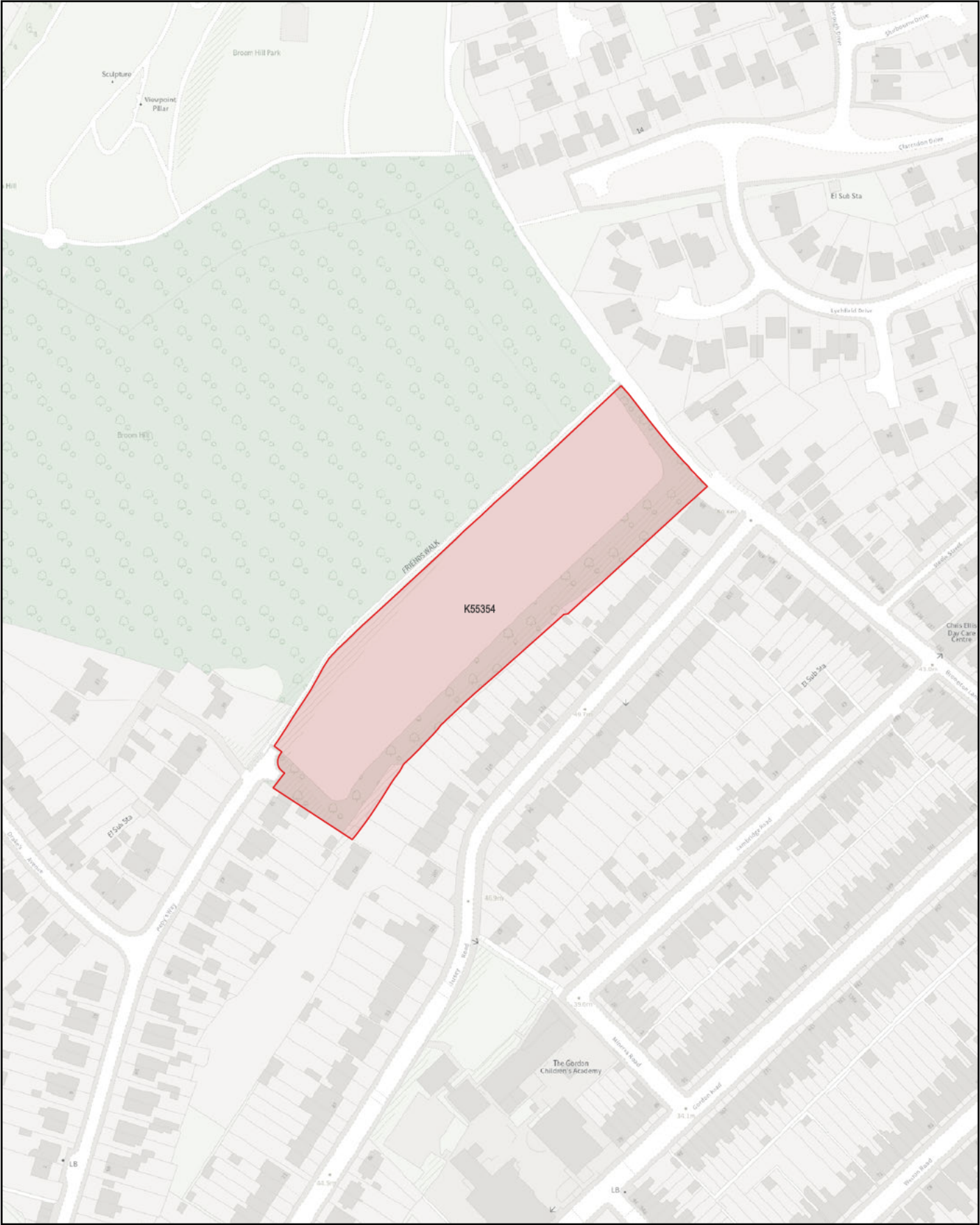
A map showing all 19 potentially suitable sites

Detailed Assessment

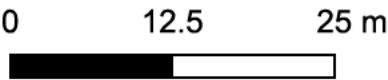
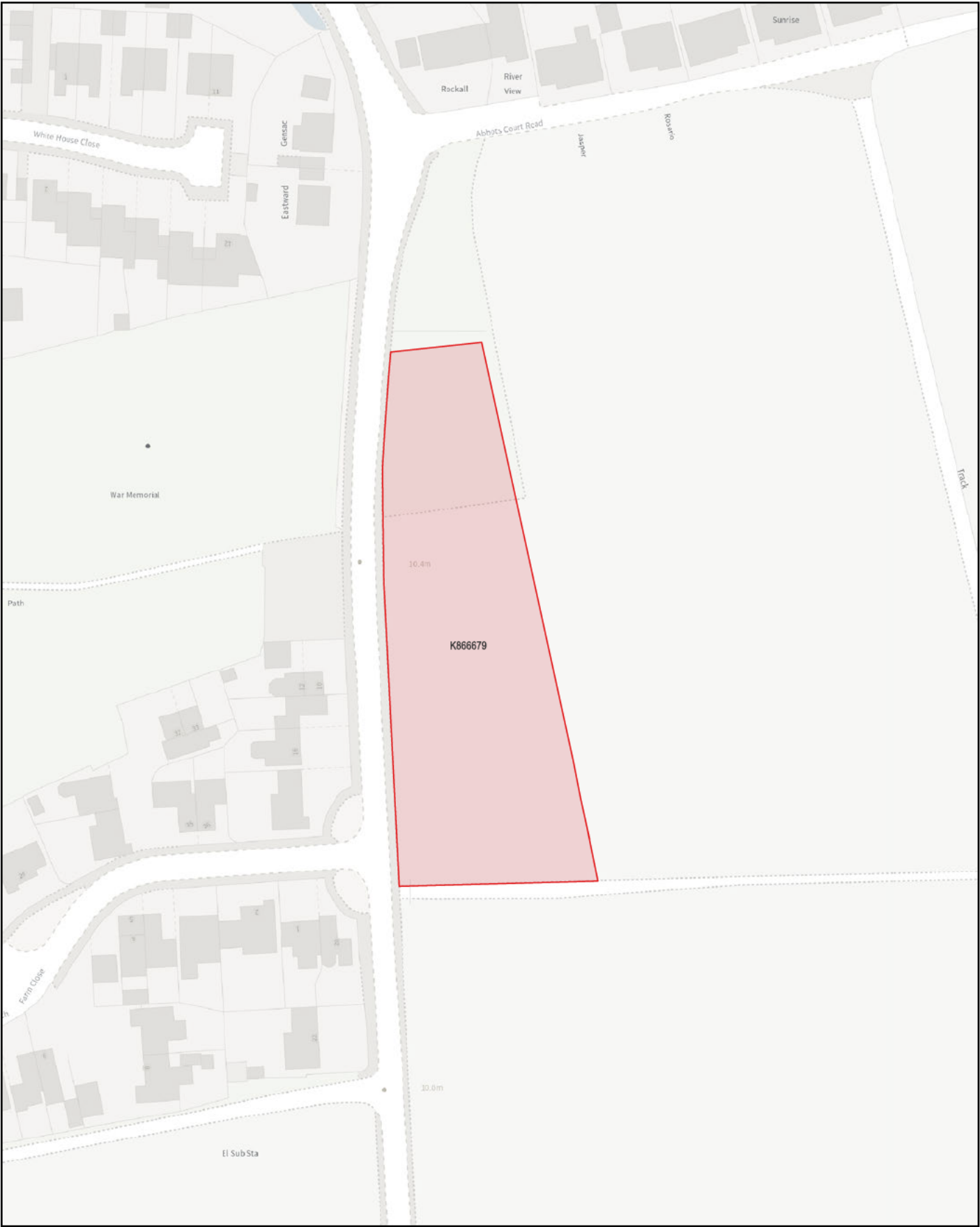


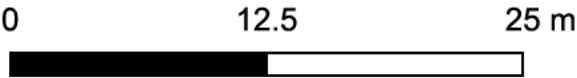
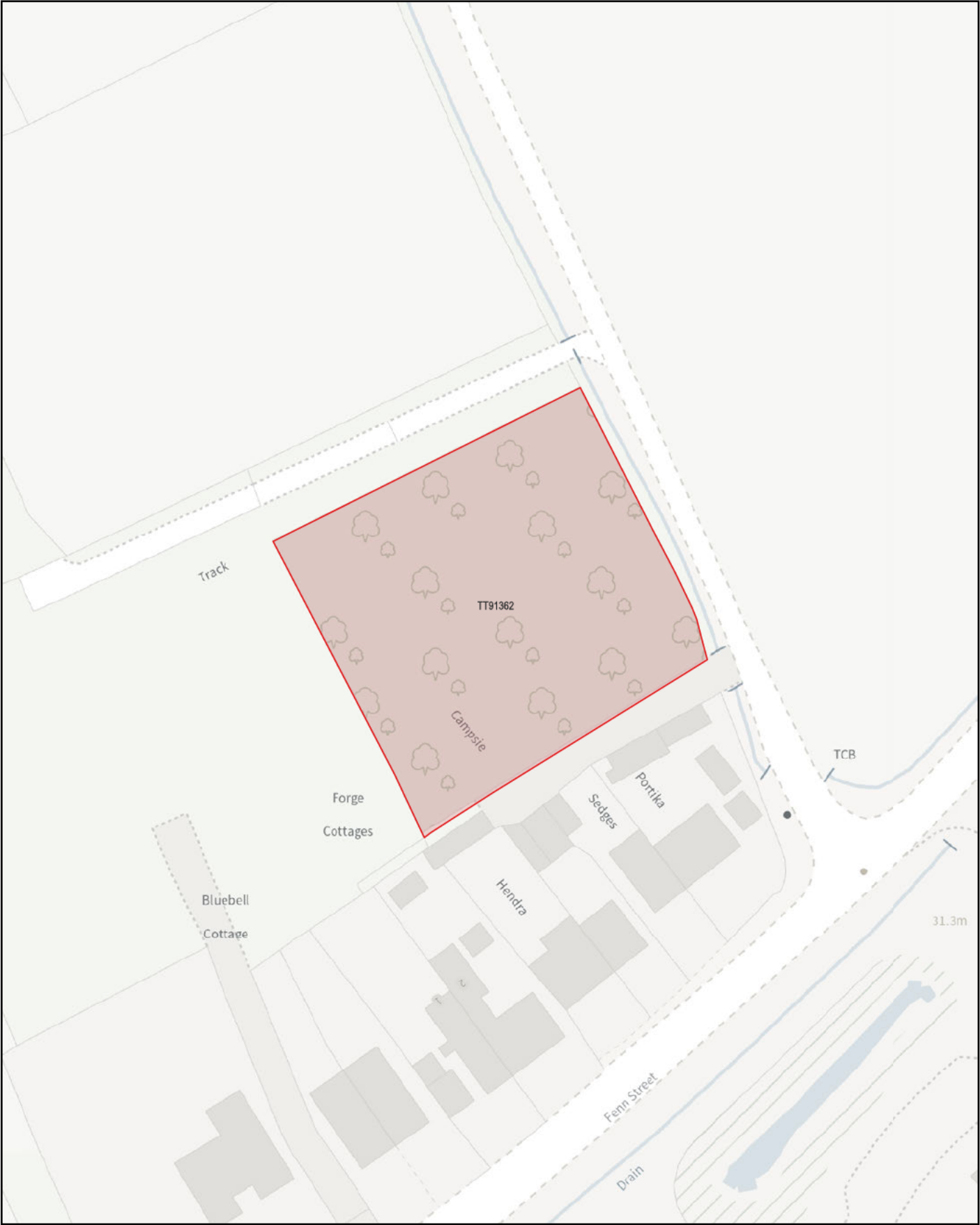
Appendix E

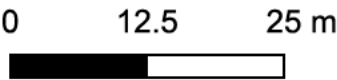
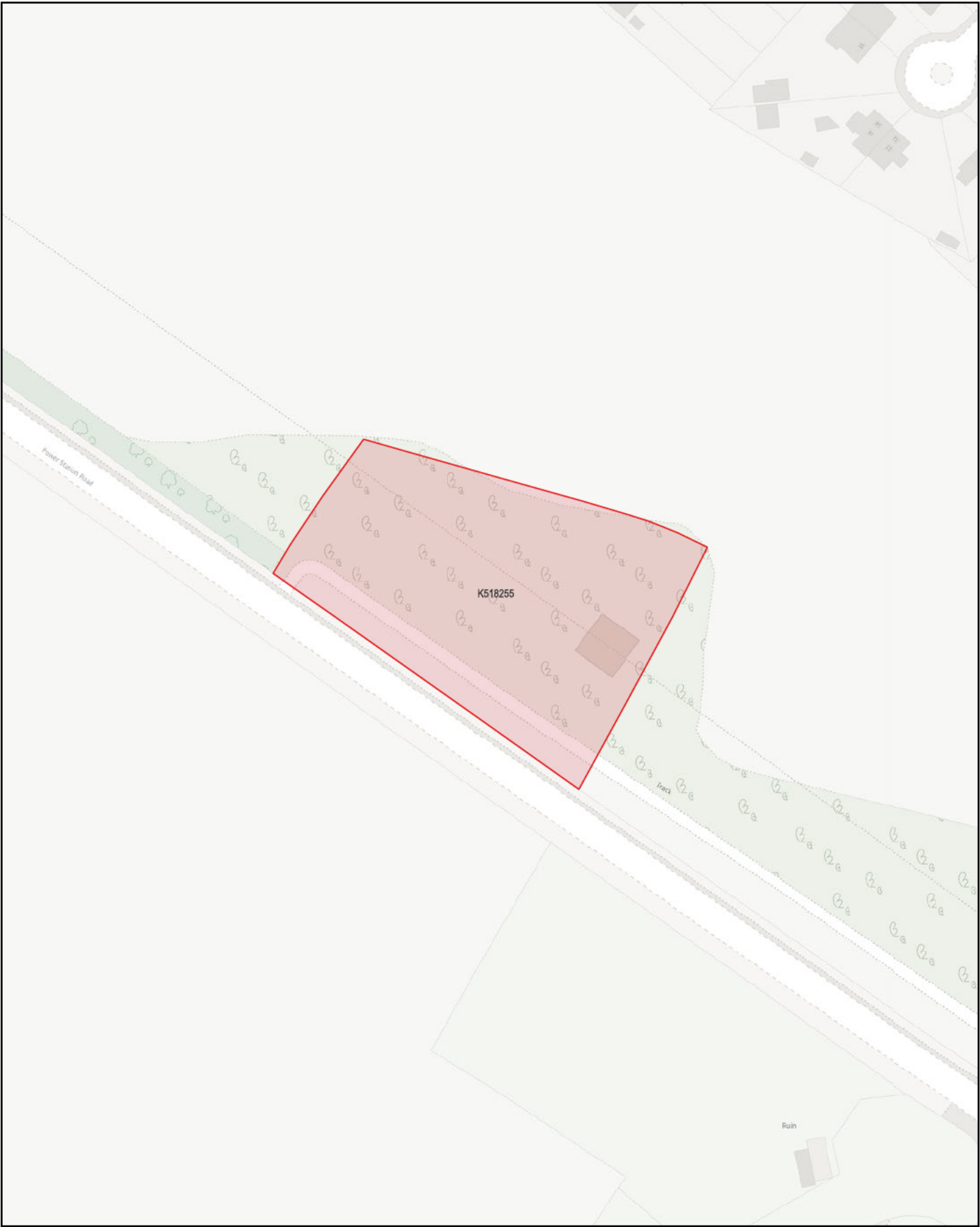
Larger scale maps showing each of the 19 potentially suitable sites



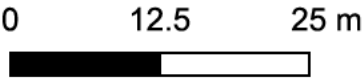
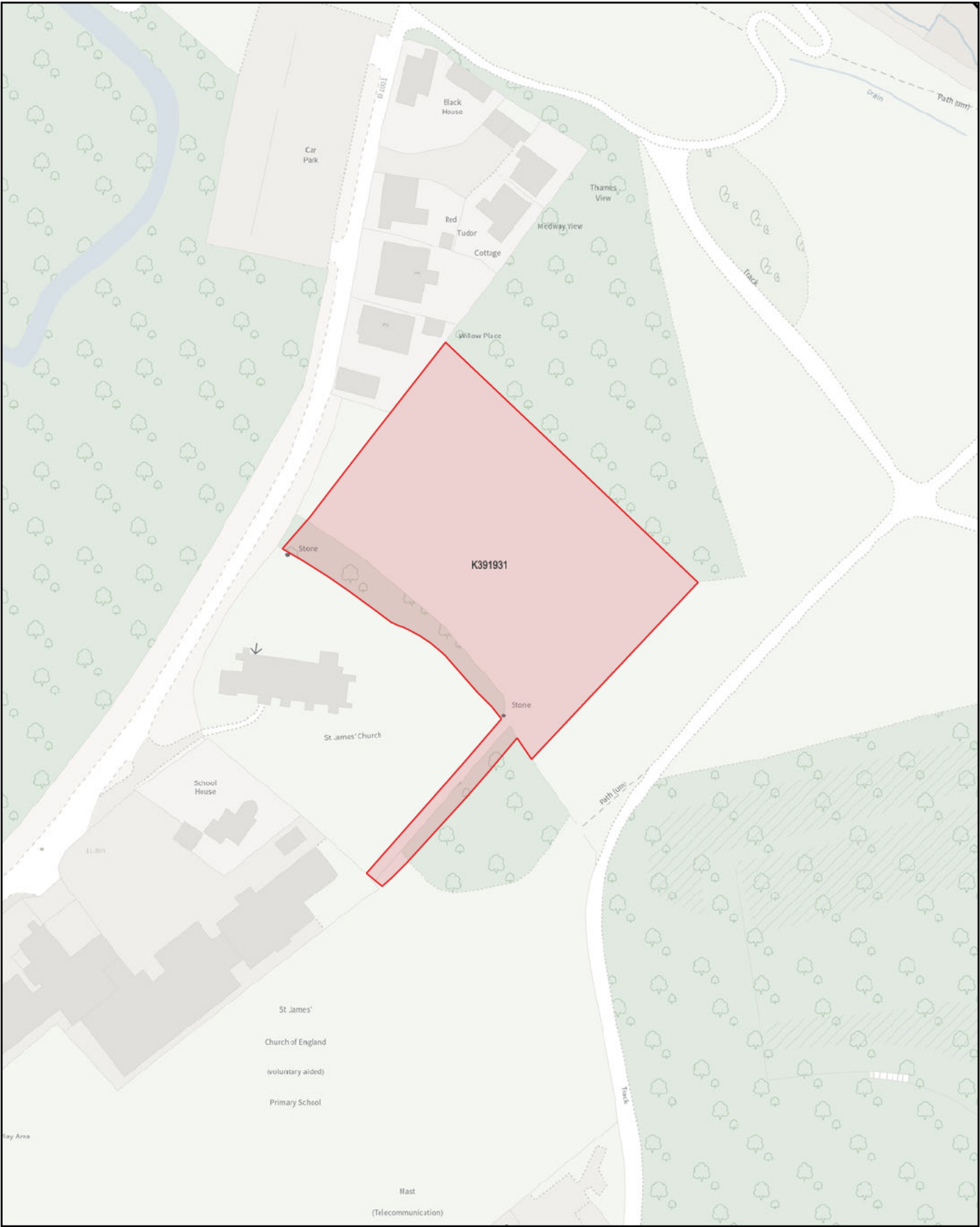
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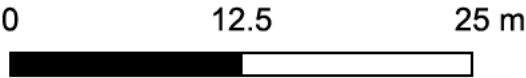
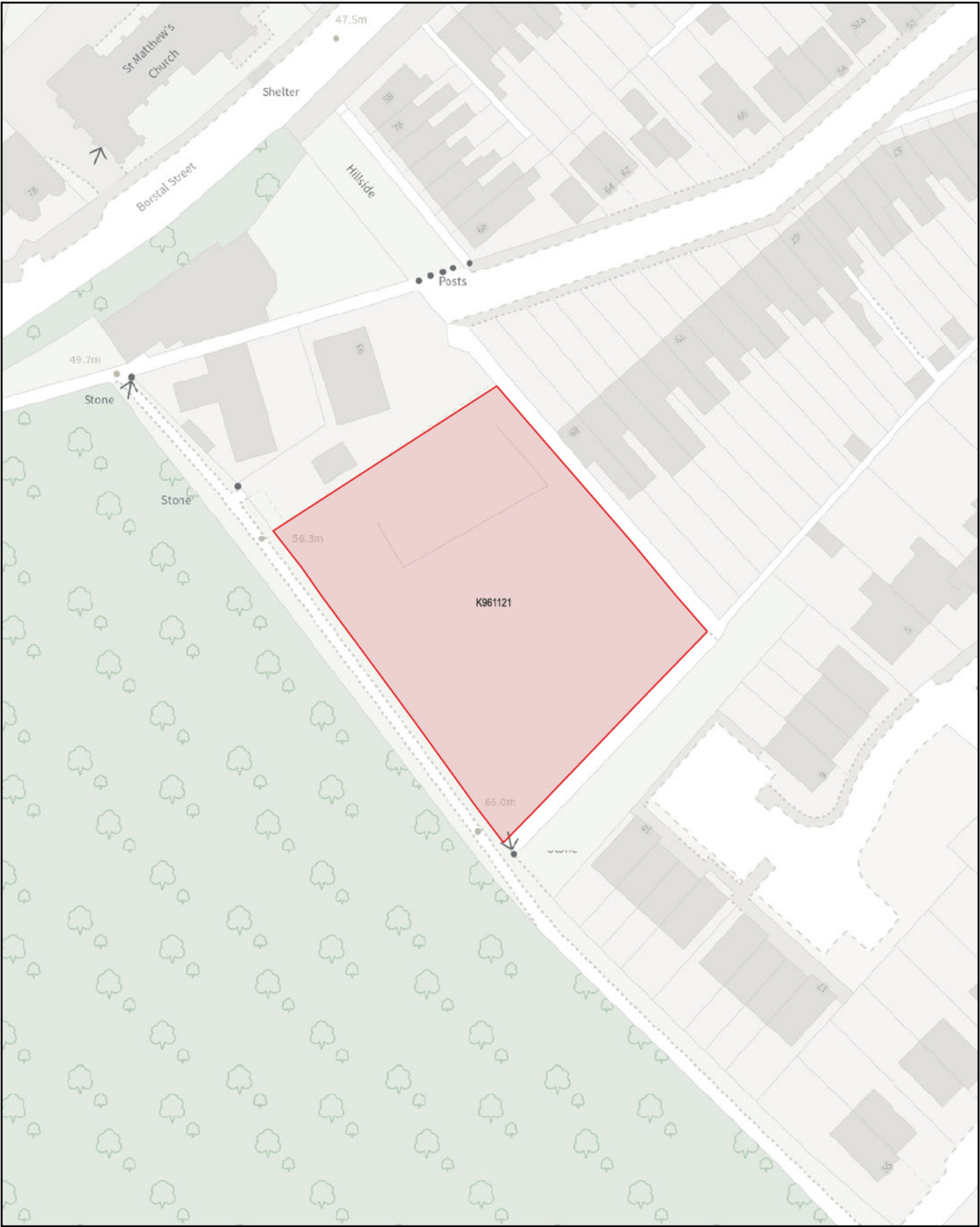


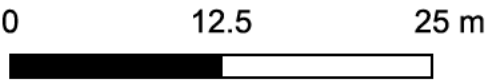
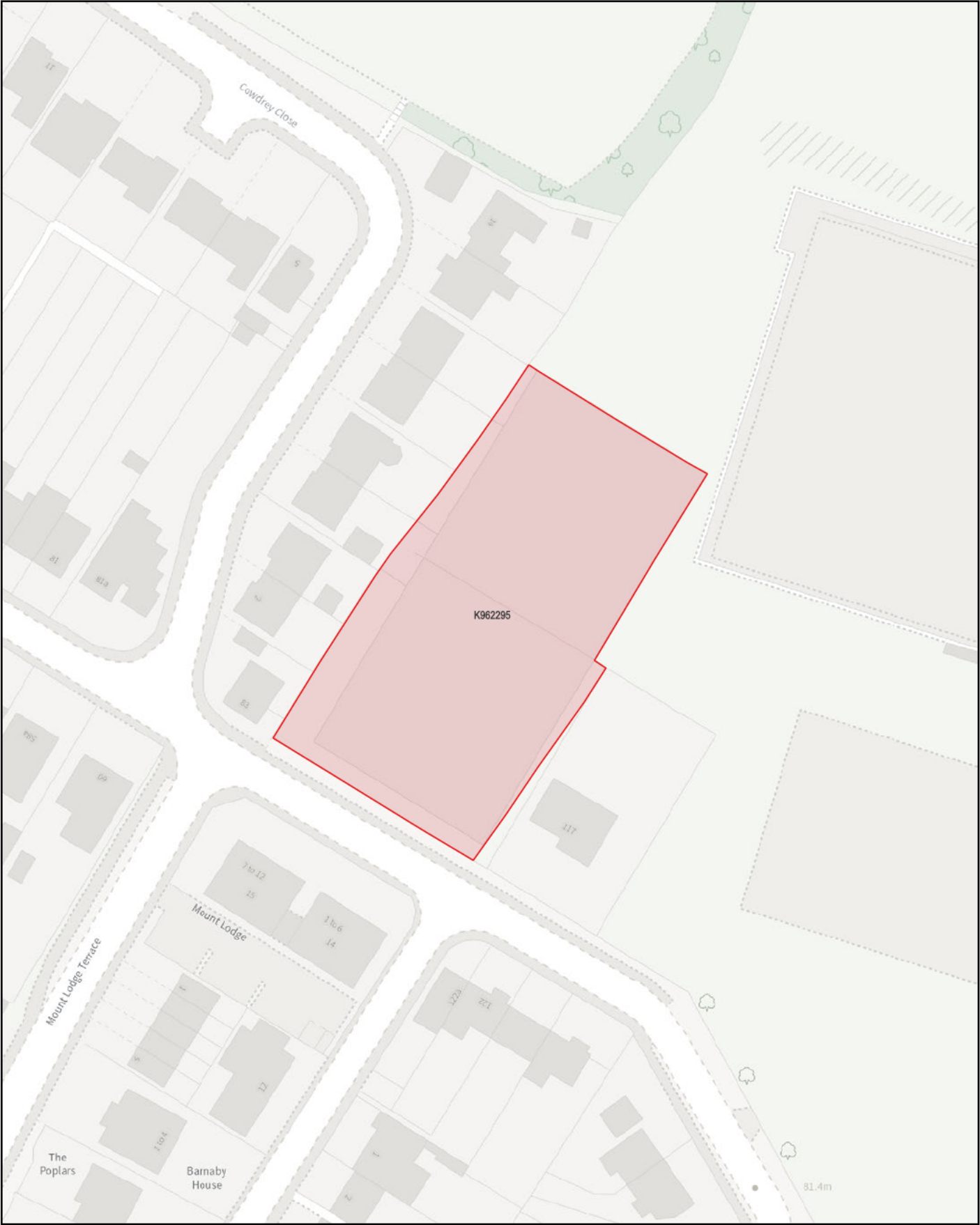


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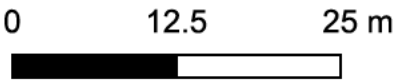


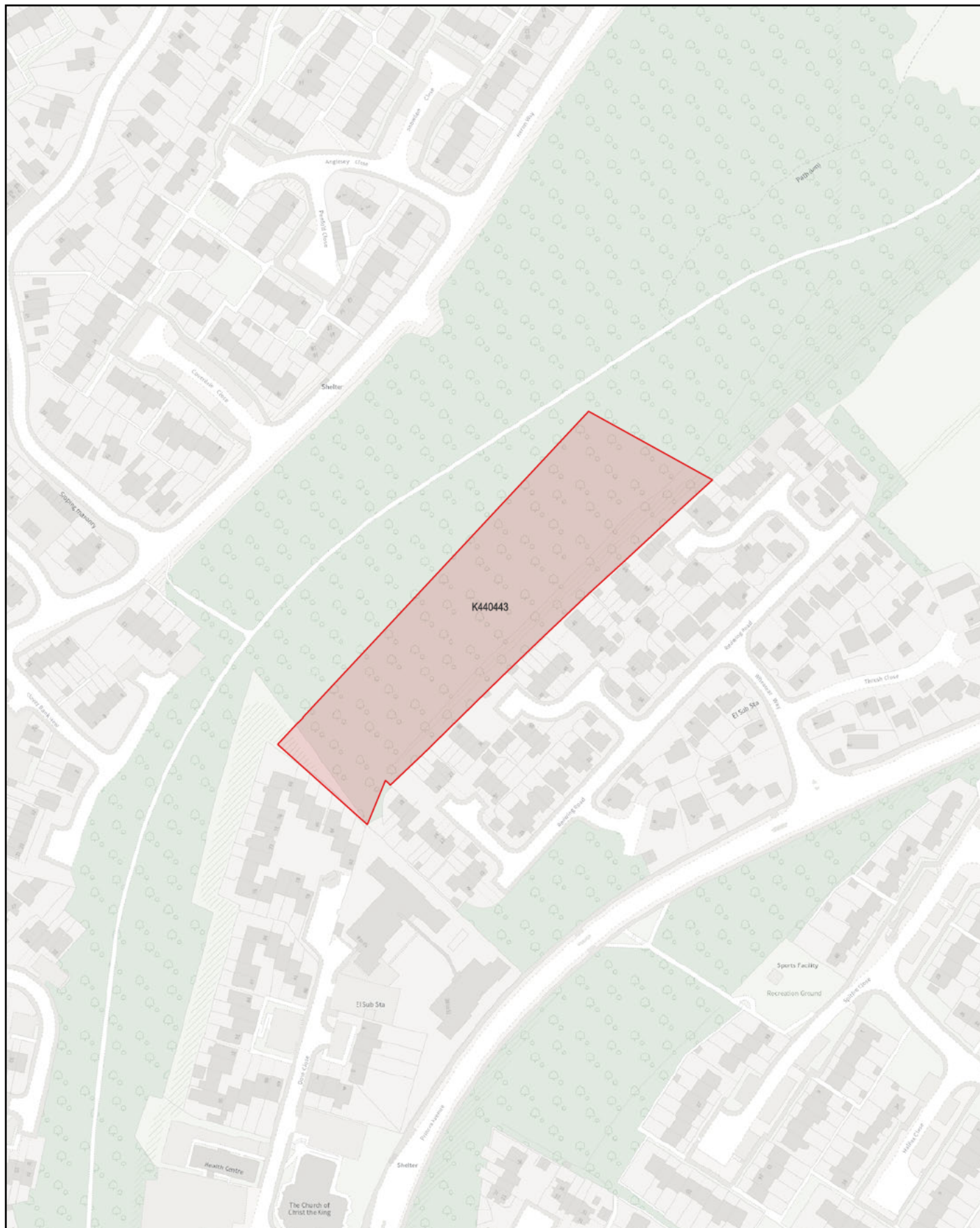
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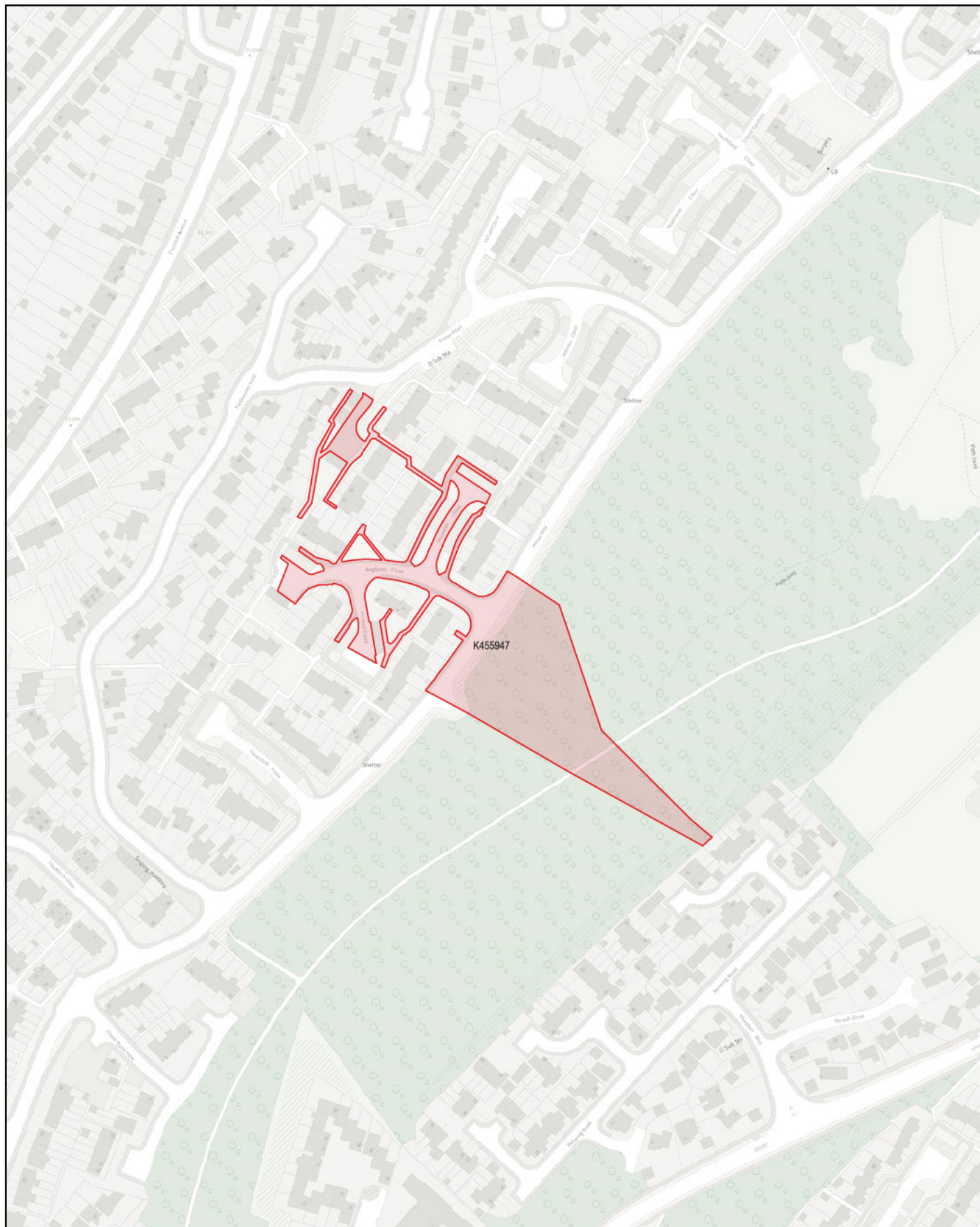




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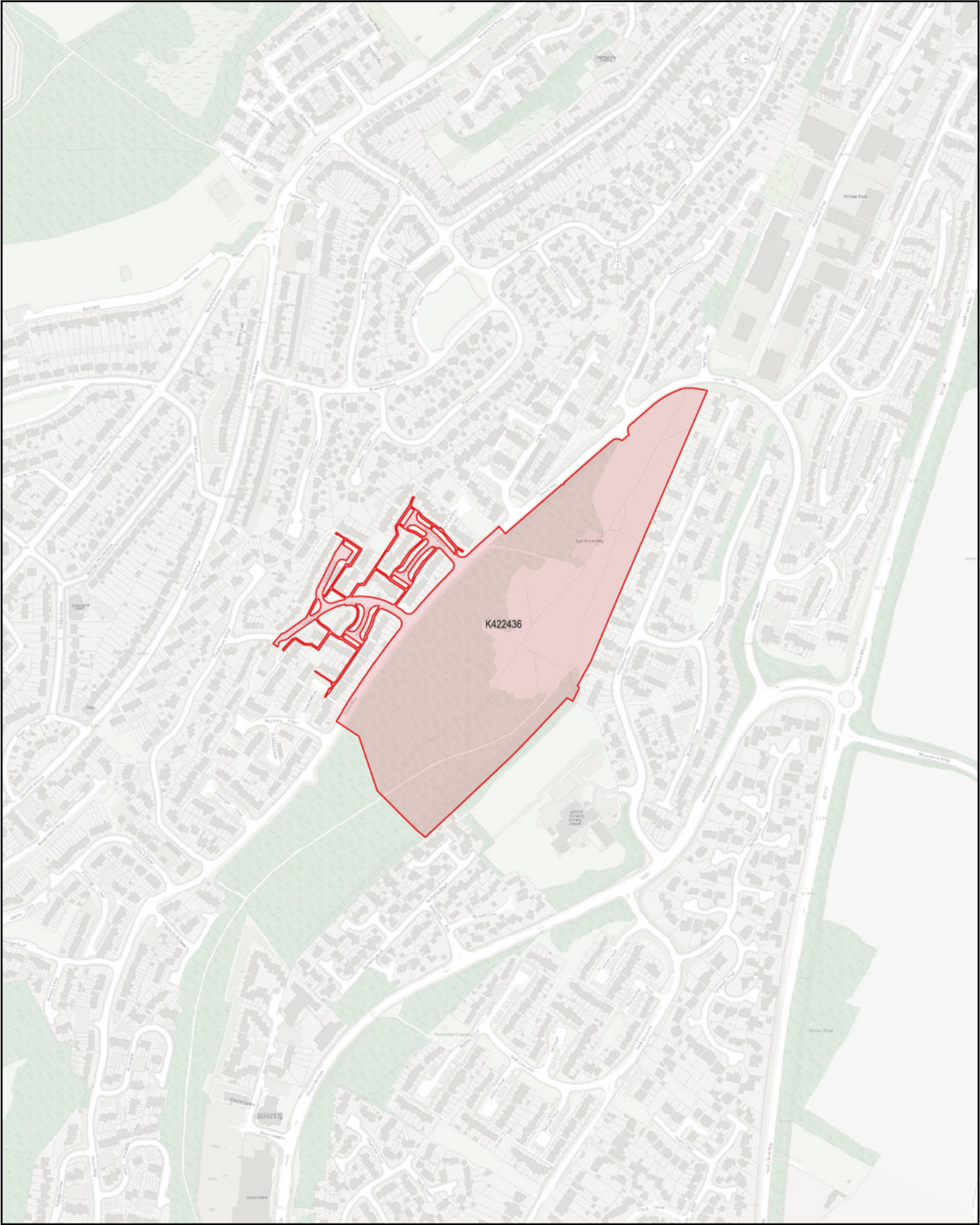
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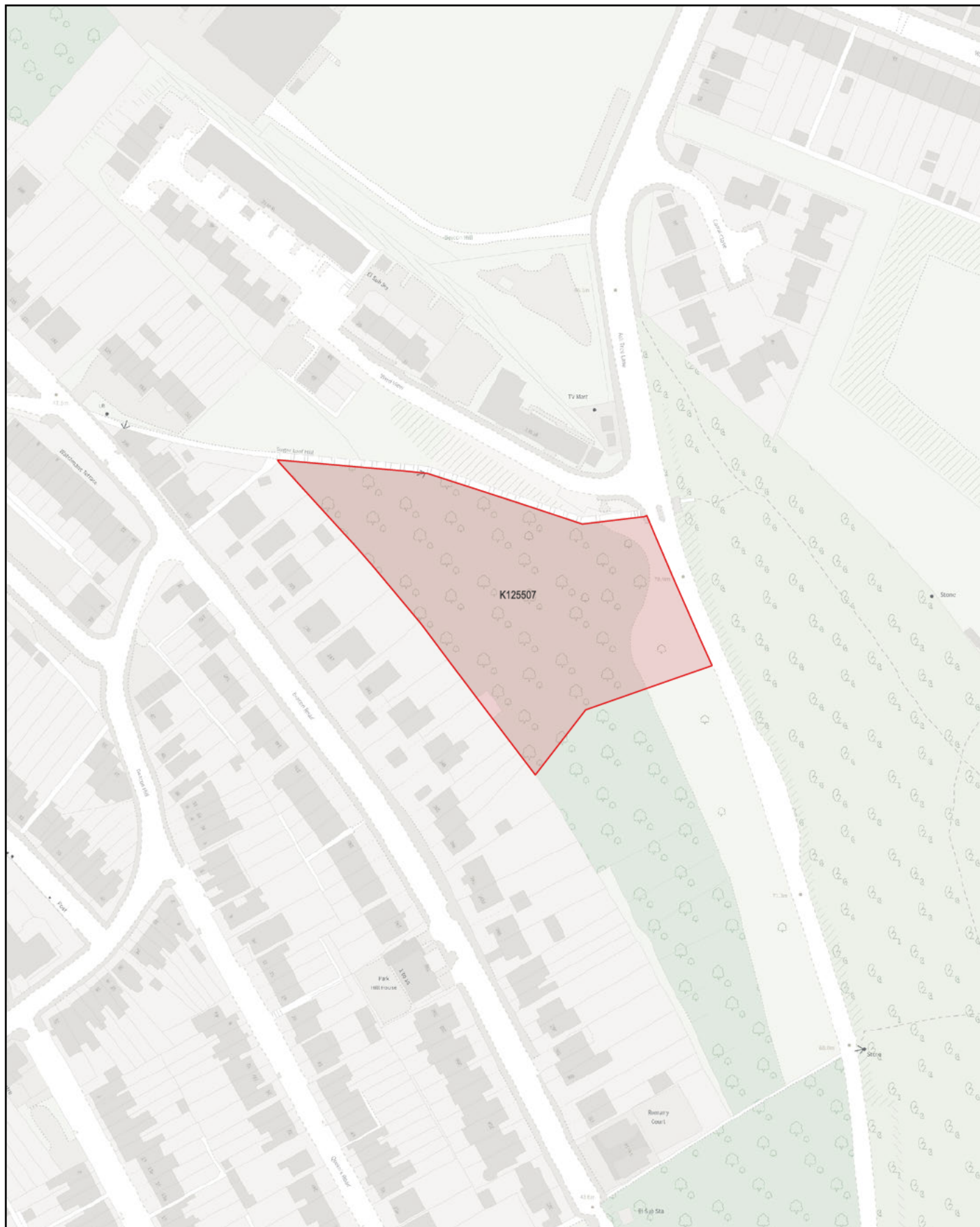




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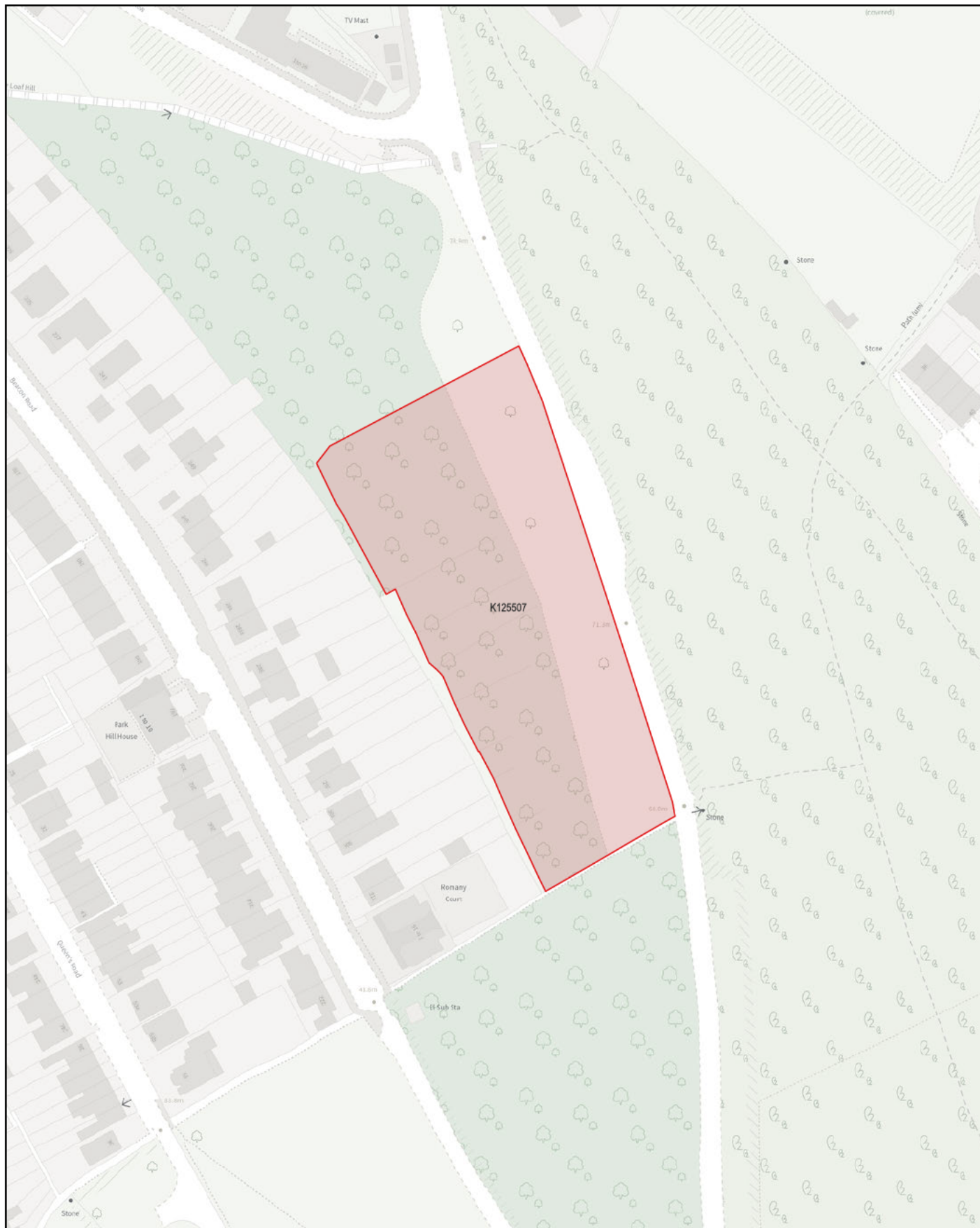
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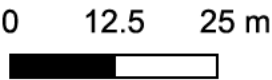
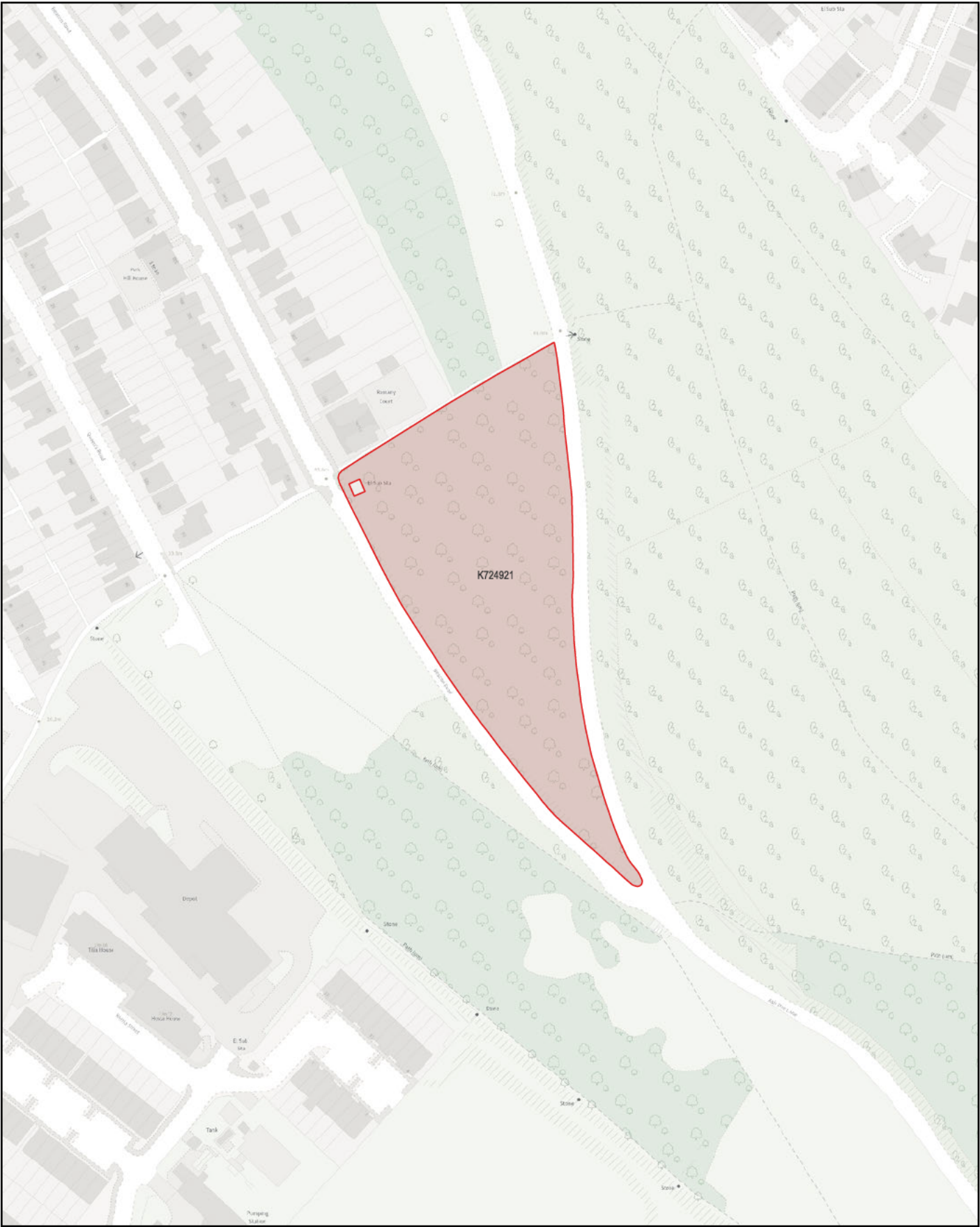


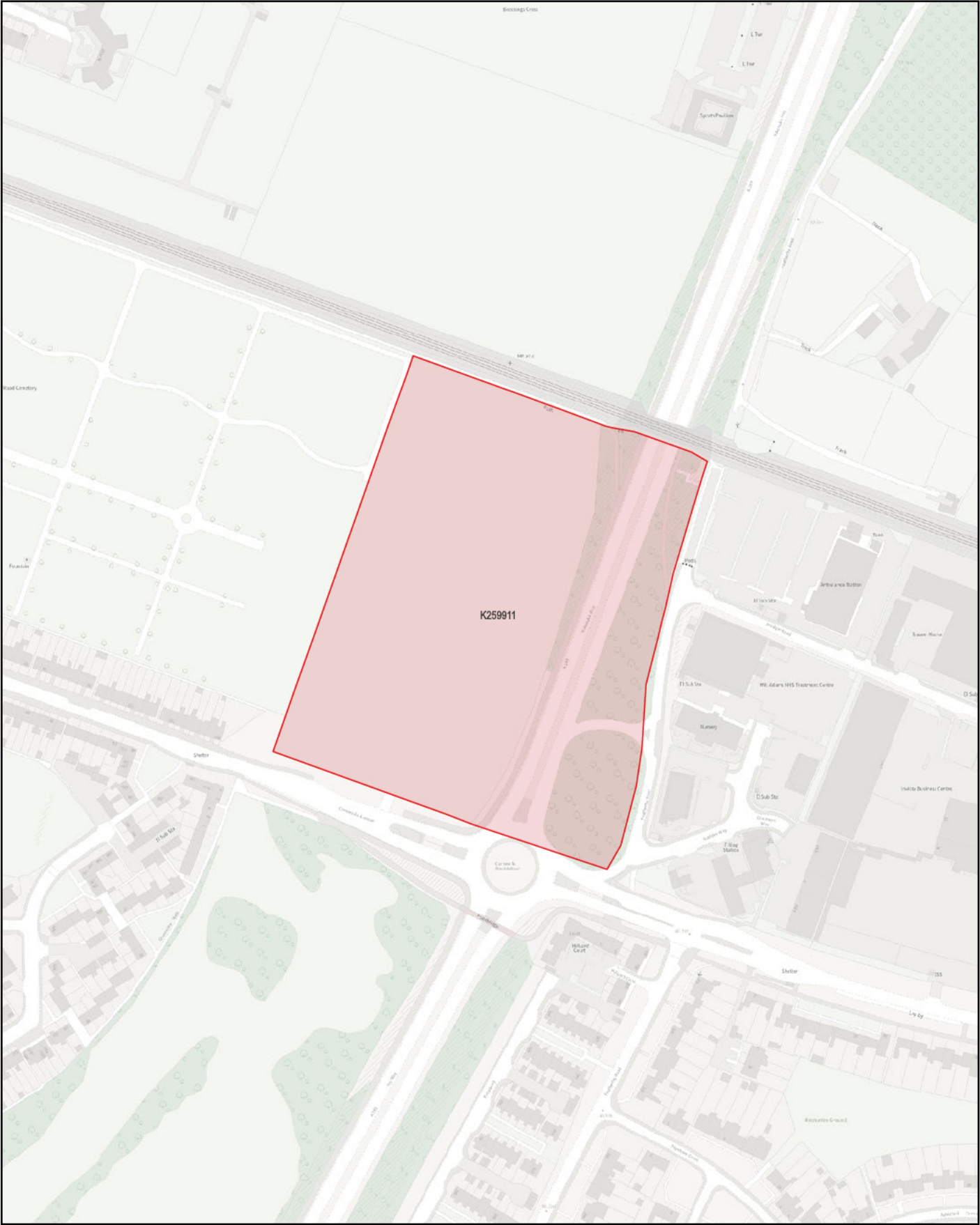
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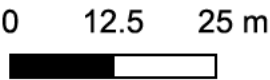
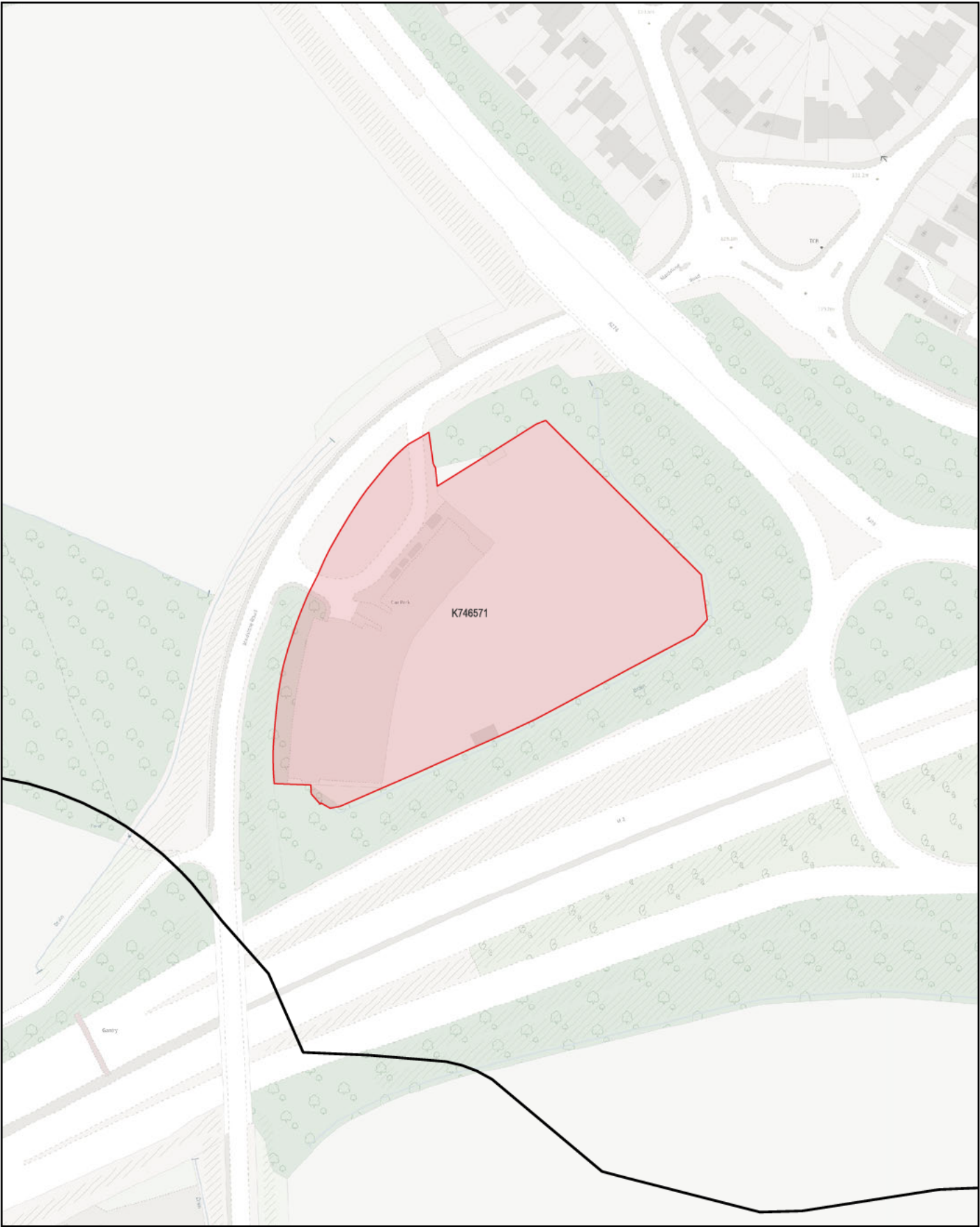
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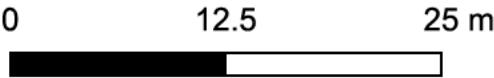
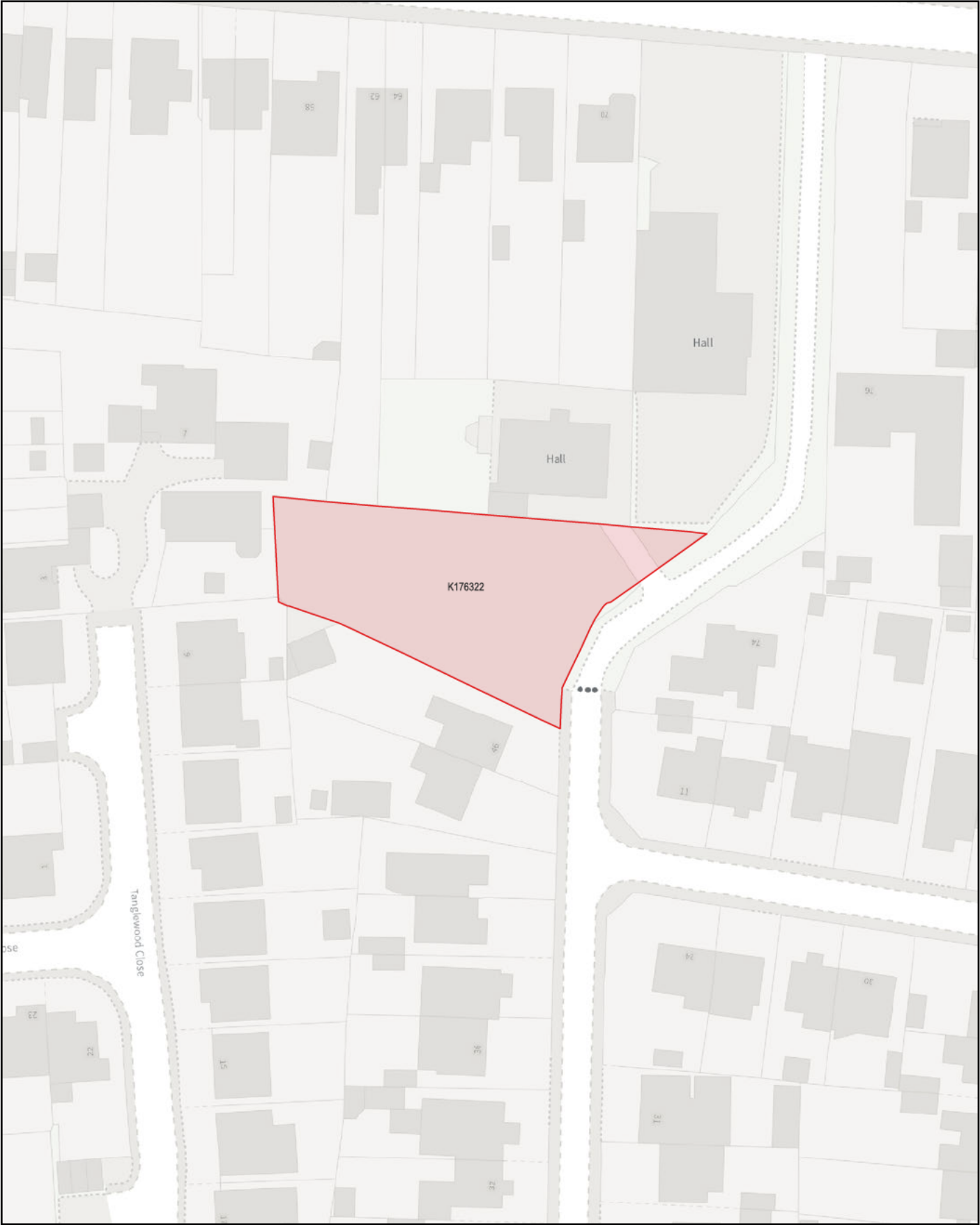


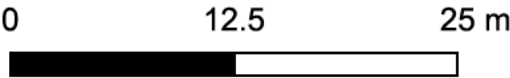
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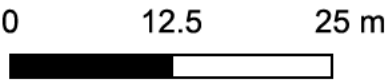
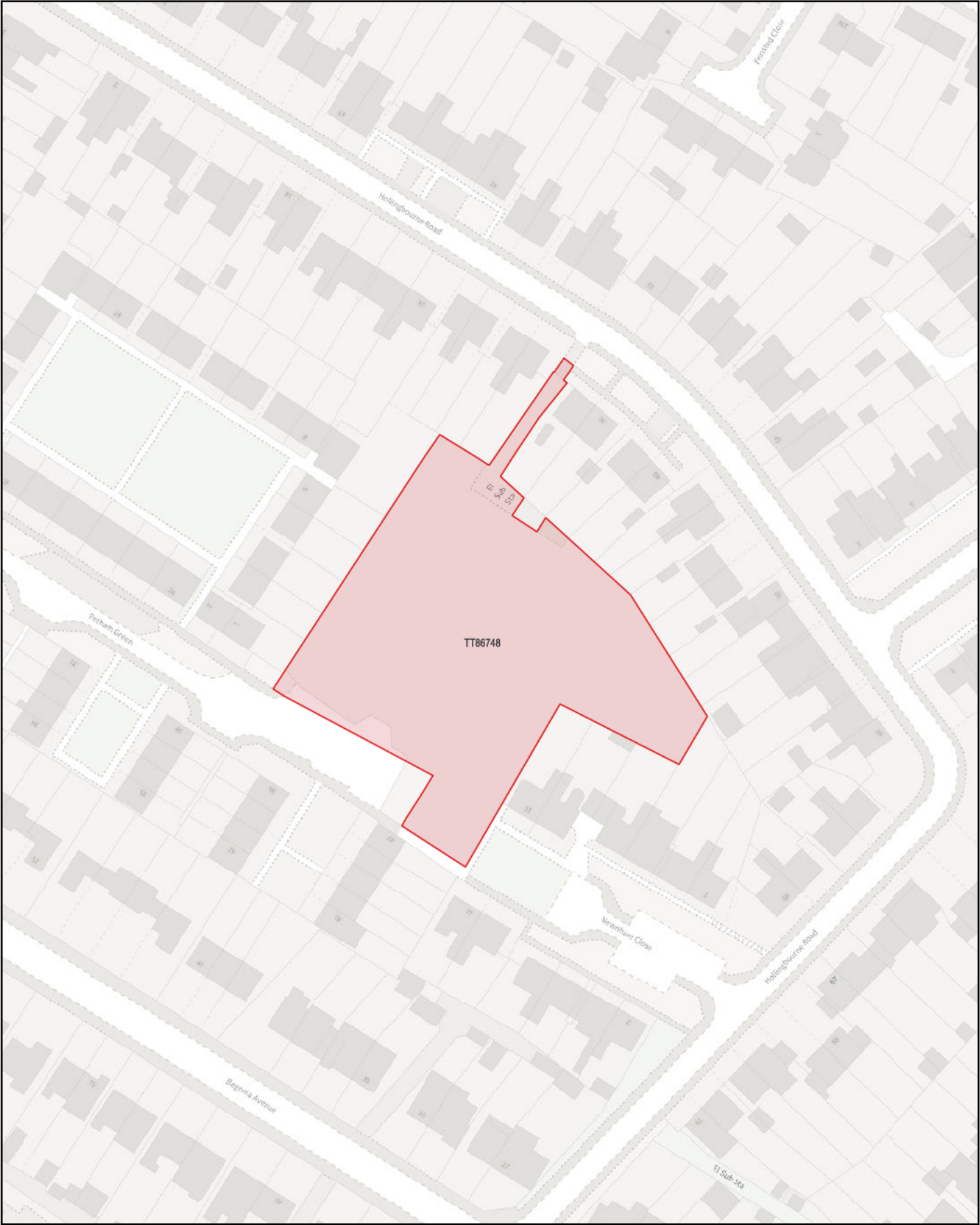












Appendix F

A table of Council officers' comments on each of the 19 potentially suitable sites

Appendix F

Land Registry Title	Policy T10 - Accessibility	Policy T10 - Scale	Policy T10 - Access	Comments
K55354	Yes - good connections to local facilities for education, healthcare, and convenience retailing.	The site is well screened by existing vegetation. The gross site area is 1.18 ha, allowing for storage and maintenance of equipment. However, the developable site area may be significantly smaller due to topography and the immediate proximity of residential dwellings.	Yes - there is safe and convenient pedestrian (Jersey Road / Brompton Lane) and vehicular access (Pepy's Way) to the public highway, with adequate space on site for vehicle turning and parking.	Although Medway Council own the freehold of this land, it is the playing field for Gordon Junior School. The site is unavailable .
K866679	Yes - good connections to local facilities for education, healthcare, and convenience retailing.	The western edge of the site, fronting Vicarage Lane, is screened by existing vegetation. The gross site area is 0.4 ha, allowing for storage and maintenance of equipment.	Yes - there is safe and convenient pedestrian and vehicular access to the public highway (Vicarage Lane), with adequate space on site for vehicle turning and parking.	Part of The site has been identified as a potential expansion to St Werburgh Church's graveyard, and it borders the Hoo Wetlands environmental project. The site is unsuitable .
TT91362	There will be good connections to some local facilities following the expansion of High Halstow.	The site is covered by dense vegetation that was not apparent during the previous stage of assessment.	There is no footway on Newlands Farm Road or Fenn Street for safe and convenient pedestrian access.	The site is unsuitable .
K518255	There are good connections to some local facilities. However, Grain is a relatively remote location.	The southern edge of the site, fronting Power Station Road, is screened by existing vegetation. The gross site area is 0.56 ha, allowing for storage and maintenance of equipment. However, the site is occupied by an electricity pylon and overhead transmission lines.	Yes - there is safe and convenient pedestrian and vehicular access to the public highway (Power Station Road); however, there is unlikely to be adequate space on site for vehicle turning and parking.	The site is located within a Control of Major Accident Hazards area. The site is unsuitable .
K391931	There are good connections to some local facilities. However, Grain is a relatively remote location.	The site is well screened by existing vegetation. The gross site area is 1.18 ha, allowing for storage and maintenance of equipment. However, the developable site area may be significantly smaller due to topography and the immediate proximity of residential dwellings.	There is no footway on to the B2001 for safe and convenient pedestrian access.	The site is located within a Control of Major Accident Hazards area. This is a valued community open space. The site is unsuitable .
K961121	Yes - good connections to local facilities for education, healthcare, and convenience retailing.	The site is covered by dense vegetation that was not apparent during the previous stage of assessment.	Yes - there is safe and convenient pedestrian and vehicular access to the public highway (Sidney Road and Elmtree Drive), with adequate space on site for vehicle turning and parking.	The site is unsuitable .
K962295	Yes - good connections to local facilities for education, healthcare, and convenience retailing.	The site is well screened by existing vegetation. The gross site area is 0.29 ha, allowing for storage and maintenance of equipment. However, the developable site area may be significantly smaller due to the immediate proximity of residential dwellings and a school.	Yes - there is safe and convenient pedestrian and vehicular access to the public highway (Valley View Road), with adequate space on site for vehicle turning and parking.	The former tennis courts were previously part of the adjacent school. The site is being considered for another residential use by Medway Council. The site is unavailable .
K427189	Yes - good connections to local facilities for education, healthcare, and convenience retailing.	The site comprises a school's playing field, which was not apparent during the previous stage of assessment.	Yes - there is safe and convenient pedestrian and vehicular access to the public highway (Maidstone Road), with	The site is unsuitable .

Land Registry Title	Policy T10 - Accessibility	Policy T10 - Scale	Policy T10 - Access	Comments
			adequate space on site for vehicle turning and parking.	
K440443	Yes - good connections to local facilities for education, healthcare, and convenience retailing.	The site is covered by dense vegetation that was not apparent during the previous stage of assessment.	It would not be possible to achieve access via Redwing Road.	This is a valued community open space and an important piece of relic downland. The site is unsuitable .
K455947	Yes - good connections to local facilities for education, healthcare, and convenience retailing.	The site is covered by dense vegetation that was not apparent during the previous stage of assessment. The developable site area may be significantly smaller due to topography and the immediate proximity of residential dwellings.	Yes - there is safe and convenient pedestrian and vehicular access to the public highway (Heron Way), with adequate space on site for vehicle turning and parking.	This is a valued community open space and an important piece of relic downland. The site is unsuitable .
K422436	Yes - good connections to local facilities for education, healthcare, and convenience retailing.	The site is covered by dense vegetation that was not apparent during the previous stage of assessment. The developable site area may be significantly smaller due to topography and the immediate proximity of residential dwellings.	Yes - there is safe and convenient pedestrian and vehicular access to the public highway (Heron Way), with adequate space on site for vehicle turning and parking.	This is a valued community open space and an important piece of relic downland. The site is unsuitable .
K125507	Yes - good connections to local facilities for education, healthcare, and convenience retailing.	The site is covered by dense vegetation that was not apparent during the previous stage of assessment. The developable site area may be significantly smaller due to topography and the immediate proximity of residential dwellings.	Yes - there is safe and convenient pedestrian access to the public highway (Sugar Loaf Hill). However, there is no vehicular access to the public highway to Ash Tree Lane.	The site is part of the 'Darland Banks and Hempstead Fringe' landscape character profile (see Landscape Character Assessment, ref: B7). The site is unsuitable .
K125507	Yes - good connections to local facilities for education, healthcare, and convenience retailing.	The site is covered by dense vegetation that was not apparent during the previous stage of assessment. The developable site area may be significantly smaller due to topography and the immediate proximity of residential dwellings.	Yes - there is safe and convenient pedestrian access to the public highway (Sugar Loaf Hill). However, there is no vehicular access to the public highway to Ash Tree Lane.	The site is part of the 'Darland Banks and Hempstead Fringe' landscape character profile (see Landscape Character Assessment, ref: B7). The site is unsuitable .
K724921	Yes - good connections to local facilities for education, healthcare, and convenience retailing.	The site is covered by dense vegetation that was not apparent during the previous stage of assessment. The developable site area may be significantly smaller due to topography.	No – safe and convenient pedestrian and vehicular access could not be achieved.	The site is part of the 'Darland Banks and Hempstead Fringe' landscape character profile (see Landscape Character Assessment, ref: B7). The site is unsuitable .
K259911	Yes - good connections to local facilities for education, healthcare, and convenience retailing.	The site is well screened by existing vegetation. The gross site area is 5 ha, allowing for storage and maintenance of equipment.	Yes - there is safe and convenient pedestrian and vehicular access to the public highway (Cornwallis Avenue), with adequate space on site for vehicle turning and parking.	Planning permission granted for a Special Education Needs and Disabilities Secondary Free School with construction due to start. The site is unavailable .
K746571	Yes - good connections to local facilities for education, healthcare, and convenience retailing.	The gross site area is 1.24 ha, allowing for storage and maintenance of equipment.	Yes - there is safe and convenient pedestrian and vehicular access to the public highway (Maidstone Road), with adequate space on site for vehicle turning and parking.	Planning permission MC/24/1038 granted on appeal (ref APP/A2280/W/25/3358815 - retrospective material change of use of land for use as gypsy traveller site). The remaining area of the site

Land Registry Title	Policy T10 - Accessibility	Policy T10 - Scale	Policy T10 - Access	Comments
				comprises a paddock. The site is suitable, available and achievable , subject to a Cabinet meeting on 4 August 2026.
K176322	Yes - good connections to local facilities for education, healthcare, and convenience retailing.	The site is Edwards Close Open Space, which was not apparent during the previous stage of assessment.	Yes - there is safe and convenient pedestrian and vehicular access to the public highway (Edwards Close), with adequate space on site for vehicle turning and parking.	This is a valued community open space. The site is unsuitable .
K707686	Yes - good connections to local facilities for education, healthcare, and convenience retailing.	The site is amenity open space, which was not apparent during the previous stage of assessment.	Yes - there is safe and convenient pedestrian and vehicular access to the public highway (Vancouver Drive), with adequate space on site for vehicle turning and parking.	This is a valued community open space. The site is unsuitable .
TT86748	Yes - good connections to local facilities for education, healthcare, and convenience retailing.	The gross site area is 0.44 ha, allowing for storage and maintenance of equipment.	Yes - there is safe and convenient pedestrian and vehicular access to the public highway (Petham Green), with adequate space on site for vehicle turning and parking.	Planning permission MC/22/1109 granted for the construction of nineteen dwellings with associated road, parking and landscaping. The site is unavailable .

Appendix G

Cabinet Report regarding provision for Gypsy and Traveller Accommodation

Cabinet

4 August 2026

Provision for Gypsy and Traveller Accommodation

Portfolio Holders: Councillor Louwella Prenter, Portfolio Holder for Housing & Homelessness
Councillor Simon Curry, Portfolio Holder for Climate Change & Strategic Regeneration

Report from: Gill James, Assistant Director, Culture & Community

Authors: Becs Wilcox, Chief Housing Officer
Dave Harris, Chief Planning Officer

Summary

This report outlines proposed steps to address the needs for Gypsy and Traveller accommodation in Medway. The submission version of the Medway Local Plan 2041 does not meet the full needs of the Gypsy and Traveller and Travelling Show People. Published correspondence between the Council and the inspectors, appointed to examine the Plan, sets out actions for the Council to identify a sufficient supply of land to meet needs.

The Council has confirmed that it will carry out actions to seek to increase certainty on meeting the identified needs for this specialist accommodation through the Plan. This is critical to the timing and progress of the Local Plan.

The Council has reviewed land in its ownership to identify further capacity for Gypsy and Traveller accommodation. It is also held a 'Call for Sites' to identify if there is suitable land in other ownership.

As part of the review of Council owned land, this report sets out proposed options and recommendations for the future use of the former Park & Ride Car Park site in Maidstone Road, Wigmore (referred to in this report as the 'Wigmore Site'). Members have previously been presented with an overview of potential options for the provision of a permanent, Council owned and managed Gypsy and Traveller site. The following report presents three options for consideration in relation to this site, with further detail and clarity to enable a formal decision on the way forward.

1. Recommendations

- 1.1. The Cabinet is asked to note the work that has been carried out to identify additional options for Gypsy and Traveller sites; to provide greater certainty that the Local Plan will meet needs.
- 1.2. The Cabinet is asked to agree to proceed with Option 3 for the future provision and use of the Wigmore Site as set out in section 5.8 of the report: to develop and improve the site as a permanent Council managed Gypsy and Traveller site to provide a good quality, compliant site for 10 touring caravans over 8 pitches, with approval to explore the provision of a second phase in future years. This second phase would expand the site into adjacent land as set out in Appendix B to the report and provide an additional 6 pitches to meet increasing future need, subject to the budget request in 1.3 below, required to deliver the second phase.
- 1.3. The Cabinet is asked to agree to recommend to Council to add **£2,684,000** to the Capital Programme (funded by prudential borrowing) to deliver the initial proposals set out in the recommended Option 3.

2 Suggested reasons for decision(s)

- 2.1 The decisions in this report are required to ensure progress and adoption of the Local Plan and for the Council to meet the identified accommodation need for the provision of Gypsy and Traveller sites in Medway.

3. Budget and policy framework

- 3.1. The decisions in this report are outside of the Council's current budget frameworks as an addition to the Capital Programme is being requested.
- 3.2. The decision to proceed with the recommended options in this report is a matter for Full Council.
- 3.3. National planning policy for Gypsy and Traveller sites requires Local Authorities to identify and seek to meet accommodation needs. The Medway Local Plan forms the main part of the Development Plan for the Council. The Development Plan is part of the Policy Framework.
- 3.4. The Council's Community Safety Plan and One Medway Plan support the positive engagement with the Gypsy and Traveller community as well as ensuring improved health and wellbeing [Priority 4] and living in good quality affordable housing [Priority 5].

4. Background

Wigmore Site

- 4.1. The Wigmore site is currently occupied by a Gypsy and Traveller family group following unsuccessful possession proceedings by the Council in February 2025 and the granting of planning permission on appeal in June 2025.

- 4.2. The current planning permission, which was submitted by the Gypsy and Traveller family group occupying the site, is for the material change of use for a Gypsy and Traveller site up to a maximum of 10 touring caravans. Alterations and expansions would require planning permission but the Inspector at the appeal considered it a good site.
- 4.3. Since that time, the site has remained informal in nature. It lacks permanent infrastructure, defined pitch arrangements, amenities and formal management controls. The Council is not currently receiving rent from the occupants but £24.00 per caravan per week is collected to cover charges for rubbish collection and toilet facilities.
- 4.4. The current operation of the site gives rise to several ongoing difficulties. There is no permanent water supply, drainage or power infrastructure, and the absence of defined pitches means that the site lacks any structured layout or capacity management.
- 4.5. In addition, the absence of formal licensing arrangements limits the Council's ability to manage occupation effectively, including the setting of fees and the enforcement of standards (for example, minimum distances between caravans to prevent the spread of fire).
- 4.6. Officers have taken steps to mitigate these issues where possible. The progression of a temporary water supply represents a practical response to immediate need, but it does not address the underlying constraints of the site. As a result, the Council remains in a reactive position, managing issues as they arise rather than operating a designed and controlled site.

Planning Matters

- 4.7. In preparing the Local Plan the Council should seek to plan positively to meet development needs. Housing is a key concern, and the Plan should provide for the scale and types of accommodation to meet our communities' needs. This includes specialist accommodation, such as pitches for gypsy and traveller, and plots for Travelling Showpeople communities. Work on the Plan in finding suitable and available sites for this type of accommodation was challenging and the Council was not able to identify new sites to allocate as development for Gypsy and Traveller use in the Plan. The Council proposed a criteria-based policy, which could be used in determining planning applications. In recent years, supply from planning permissions, or appeals has provided 26 pitches, which is nearly half of the needs over the plan period. The Council's evidence base – Gypsy and Traveller Accommodation Assessment identified a need from 2022-2041 for 56 pitches for Gypsy and Traveller households and 8 plots for Travelling Showpeople. Given the recent planning consents, the residual need to be addressed in the Plan is 30 pitches for Gypsy and Traveller Households and 8 plots for Travelling Showpeople.
- 4.8. As part of the Local Plan examination process, the Inspectors have raised concerns that the Council has not clearly demonstrated compliance with the Planning Policy for Traveller Sites (PPTS), particularly in showing a

deliverable five-year supply of sites and a longer-term pipeline of developable sites or locations. Other key concerns raised by the Inspector include:

- The Local Plan's reliance on the intensification and expansion of existing sites, rather than allocating specific new or extended sites, lacks sufficient justification and may not align with national policy.
- There are weaknesses in the evidence base, including limited clarity on the methodology and conclusions of the Gypsy and Traveller Accommodation Assessment (GTAA), and the absence of formal allocations for site extensions.

4.9. The Council has responded to the Inspectors setting out steps to seek to increase certainty on the supply of pitches and plots in the Local Plan. These are:

- Hold a Call for Sites to identify any further suitable and available sites for Gypsy and Traveller use
- Review Council owned land to identify any suitable and available sites
- Assess the options for Compulsory Purchase Orders to secure use for Gypsy and Traveller households
- Assess the potential for intensification of existing sites, to increase capacity – this would include a review of the Travelling Showpeople's site at Strood
- Assess the potential to secure pitches as part of strategic development sites
- Assess the options for use of land at Wigmore

4.10 The Planning Service is holding the Call for Sites between 8 June and 20 July and is currently reviewing council owned land and will report back to the Plan Inspectors by 31 July. If the actions outlined above identify potential suitable sites, these will be reported to Cabinet and seek approval to consult on additional allocations. The consultation would run from mid-August to the end of September and would support the anticipated timetable for Stage 2 hearing sessions for the Local Plan examination in late 2026.

5. Options

- 5.1. Various options for the Wigmore site have been considered and refined following the earlier report to Members. The option of maintaining the current arrangement has been considered but is not viable beyond the short term. Although it avoids immediate capital expenditure, it does not address infrastructure deficiencies, does not provide a mechanism for effective site management, and leaves the Council exposed to ongoing legal and reputational risk. It also fails to align with Local Plan priorities.
- 5.2. The option of disposing of the site has also been revisited. While disposal may present an opportunity to achieve a capital receipt, it introduces significant legal and reputational complexities, particularly in relation to the Council's duties under equalities and human rights legislation. There is also no certainty that disposal would achieve vacant possession or deliver a better

outcome, and it would not contribute to meeting Gypsy and Traveller accommodation needs.

- 5.3. Two options remain subject to a capital budget commitment and grant funding opportunities being explored. The first is the formalisation of the existing site within its current boundary (Option 2, please see Appendix A). This would involve developing a permanent Council managed site of up to ten pitches, together with the necessary infrastructure and facilities. This approach would allow the Council to regularise occupation through licences, introduce a fee structure, and implement formal management arrangements.
- 5.4. The second option, and the one recommended in this report, is to firstly formalise the existing site within its current boundary as described in 5.3 above. But, in addition, to allow for the future expansion and further development of the site into adjacent land (Option 3, please see Appendix B). This approach allows for future flexibility to meet the increasing need for more provision as the current, and any future, family group grows.
- 5.5. Officers commissioned architects Hazle McCormack Young LLP (HMY) to undertake a Stage 1 feasibility study and develop indicative concept layouts for the Wigmore site.
- 5.6. The feasibility work confirms that the site is suitable in principle for development, noting its location, access to the highway network, proximity to facilities, and physical characteristics. The site is relatively flat, with existing areas of hardstanding and defined access from Maidstone Road, which reduces some development constraints typically associated with greenfield sites.
- 5.7. HMY developed two indicative designs which align directly with Options 2 and 3 set out in this report. Both layouts have been designed in accordance with national good practice guidance for Gypsy and Traveller sites, including requirements for pitch sizes, spacing between units, access for emergency vehicles, and provision of utilities. The designs also reflect operational considerations such as safe circulation, defined boundaries, and the integration of communal or open space.
- 5.8. Please find below an options appraisal on the three options to be considered:

Option	Estimated Cost	Pros	Cons
1 – do nothing & the site remains as it is.	£50,000 per year	- Limited impact on Council budgets. - Limited impact on Council resources.	- Missed opportunity to help meet an identified need for Gypsy & Traveller accommodation. - Negative impact on adoption of the Local Plan.

			No formal management arrangements in place, which could lead to issues with site safety, welfare concerns etc.
2- develop & improve the site within the current boundary to provide 8 pitches for 10 touring caravans.	£2,684,000 (This assumes no grant funding, as a worst-case scenario)	- The site is in a suitable location with minimal impact on residential areas. - Provides a compliant, good quality site for the current & any new residents. - Helps meet the identified need required for the Local Plan. - Increased likelihood of positive outcomes with enforcement against unauthorised encampments in Medway (due to increased provision).	- Only provides limited provision, not allowing for future needs as families grow. - Does not make best use of the whole, existing site. - Additional capital expenditure.
3 – develop & improve the site to provide 8 pitches for 10 touring caravans. Plus approval to explore a future expansion into adjacent land as a second phase to add	£2,684,000 (This assumes no grant funding, as a worst-case scenario) Costs for phase 1 only at this time, due to proposed timescales.	- The site is in a suitable location with minimal impact on residential areas. - Provides a compliant, good quality site for the current & any new residents. - Helps meet an increased level of identified need required	Increased level of additional, future capital expenditure.

another 6 pitches.		for the Local Plan. • Allows for the provision of a larger site to meet future, increased need. • Increased likelihood of positive outcomes with enforcement against unauthorised encampments in Medway (due to increased provision & plans for further provision on site).	
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5.9. The capital budget identified for Options 2 and 3 has been based on high-level costings carried out by a Quantity Surveyor. This includes:

- Site clearance, enabling works, groundworks/site levelling
- Road, hardstanding, landscaping and communal space/play area
- Contractor preliminaries, environmental surveys/reports, design/architect/employer's agent fees, planning and building control fees.
- Utility blocks (including fitting out, finishes, mechanical/electrical installations etc.)
- Noise screening/acoustic barriers
- Solar PV, heat pumps etc.
- Lighting, fire safety equipment/measures
- Water, sewer and electric connections

5.10. Both Options 2 and 3 will require a new full planning application to be put together and submitted (with a pre-application prior to this), to include the tender and appointment of an architect and quantity surveyor to complete the full designs and requirements (surveys, searches etc.) for a planning application.

5.11. A full tender process will be required to appoint a build contractor to deliver the site, along with an Employers Agent. It is anticipated this along with the

items set out in 5.9 above, would take 12 to 18 months to complete, before construction works on site could commence (for the delivery of 8 pitches, for 10 touring caravans).

- 5.12. It should be noted that the current family group occupying the site would need to be decanted and placed in alternative accommodation for the duration of the construction works.
- 5.13. It is recognised nationally that the cost of developing Gypsy and Traveller sites is disproportionately high meaning they are financially challenged from the start. Please see Exempt Appendix C for details of the financial appraisal and cash flow modelling undertaken.
- 5.14. The development of permanent Gypsy and Traveller sites is eligible for grant funding through the Homes England Social and Affordable Homes Programme (SAHP).
- 5.15. There is no separate or ring-fenced funding in SAHP specifically for Gypsy and Traveller sites, applications are considered alongside the wider 10-year programme. But there is flexibility to support a diverse range of affordable homes including Gypsy and Traveller sites, with specific guidance set out under the SAHP Capital Funding Guide.
- 5.16. It should be noted that all applications to SAHP are assessed on a case-by-case basis and the grant funding **does not** cover the full costs. The amount of grant funding depends on the merits of each scheme and applications are assessed for value for money based on their particular circumstances (Homes England does not have set grant rates).
- 5.17. Therefore, it is only possible to make assumptions on the potential level of grant funding that could be secured. However, officers would actively engage with our Homes England contact to discuss and develop an application that maximises the funding available.
- 5.18. An application to SAHP would need to demonstrate innovation in the site design, for example by incorporating renewable energy (solar PV and heat pumps) and using enhanced building fabric standards for the utility blocks. Other ideas could include acoustic screening, dedicated garden space, play areas and multi-functional utility blocks.
- 5.19. With a lack of good quality, sustainable sites across Kent and Medway, this is an opportunity for the Council to be an innovator and lead the way in setting the standard for successful Gypsy & Traveller site delivery. Positive impacts include:
 - Demonstrating our commitment to meeting the needs identified in the current Gypsy and Traveller Accommodation Assessment and Planning Policy for Traveller Sites.
 - Practical use of previously unused land to provide a safe, secure and healthy permanent base for Gypsy and Traveller households, which in

turn will contribute to improved health, wellbeing, social and educational outcomes for the people living there.

- Demonstrate that the Council is committed to supporting vulnerable people and recognises the importance of the Gypsy and Traveller community to the make-up of our diverse and inclusive Medway, embodying the principles of our One Medway Council Plan.
- The opportunity to showcase what can be achieved with a well thought out, forward-thinking design in terms of quality and sustainability whilst providing a much-needed base for homes.

5.20. The Planning Service will consider the outcome of the work outlined at paragraph 4.9 above and will provide an update for Cabinet setting out any resulting further options.

6. Advice and analysis

- 6.1. Formalising and maximising the use of the Wigmore site provides a direct opportunity to contribute towards identified pitch requirements while reducing reliance on unauthorised or temporary arrangements. It also strengthens the Council's position in demonstrating deliverable supply at Local Plan examination.
- 6.2. Conversely, failure to bring this site forward as a dedicated Gypsy and Traveller provision would increase pressure elsewhere across Medway and undermine the Council's ability to meet its obligations. The strategic importance of this site within the Local Plan context is therefore significant.
- 6.3. The Public Sector Equality Duty requires the Council to take decisions in a way that aims to eliminate discrimination, advance equality and foster good community relations. Race is a protected characteristic under the Public Sector Equality Duty, and the Council is therefore required to consider the impact of its decisions on people of Gypsy and Traveller heritage.
- 6.4. The insufficient supply of accommodation for Gypsy and Traveller households in Medway does result in disadvantage for Gypsy and Traveller households. It is imperative that the Council works to increase the available accommodation supply to eliminate this disadvantage. The recommendations set out in this report will help ensure the accommodation needs of Gypsy and Traveller households are met within the Medway Local Plan 2041. Additional information, advising on the outcome of the current work in the Planning Service seeking to identify additional sites, and any recommendations for decision making will be reported to Cabinet.
- 6.5. A Diversity Impact Assessment (DIA) is included with this report in Appendix D. In summary, the DIA identifies and confirms an advance equality impact from the recommendations within this report and a positive impact in terms of fostering good relations. The proposed Wigmore site (and other potential future provision) will aim to advance equality of opportunity for the Gypsy and

Traveller community. The provision of new sites will help to reduce the occurrence of unauthorised development and encampments, which in turn is anticipated to reduce any potential tensions with the settled community.

- 6.6. The DIA identifies that the establishment of a permanent site would allow positive impacts on child and adult safeguarding. This can be achieved with current and future children occupying the site and continuing their education in a familiar and consistent setting, resulting in a positive impact. The provision of a site will also have a positive impact on the health and wellbeing of older people, allowing better and more consistent access to local services and support. Likewise, living on a permanent site will allow expectant women and mothers of younger children a safe place from which to access services (GP, midwife, health visitor etc.). Travellers with physical disabilities will benefit from the provision of a permanent site by the availability of flat, level ground with accessible facilities.

7. Risk management

Risk	Description	Action to avoid or mitigate risk	Risk rating
Adoption of the Medway Local Plan 2041.	Failure to develop the Wigmore site as permanent provision, contributing to supply, puts progress and adoption of the Local Plan at risk.	Options presented to develop the Wigmore site to help meet the identified need.	B2
Adoption of the Medway Local Plan 2041.	Failure to explore and identify further sites/options to meet the identified need for Gypsy & Traveller site provision.	Council to review land in its ownership & carry out a 'call for sites' to review options in other ownership.	B2
Environmental restraints.	Potential issues such as contaminated land which may limit use of the land at the Wigmore site.	Ecological surveys to be completed in the early stages to identify any issues.	C3
Tender process delays.	Insufficient contractors available to undertake the works required at the Wigmore site.	Monitor the availability of contractors ahead of the tender process.	C2
Budget overspend.	Unforeseen works and/or complications during the build process resulting in an increase in costs.	Early engagement with Quantity Surveyors in establishing cost plans. Engage with other LA's who have delivered sites to identify any issues encountered.	C3

Risk	Description	Action to avoid or mitigate risk	Risk rating
Complications with the decant of the current occupants at the Wigmore site.	Costs associated with the decant and provision of suitable alternative accommodation, and Identifying suitable accommodation.	Early resident engagement and review of the options available.	B3

For risk rating, please refer to the following table:

Likelihood	Impact:
A Very likely B Likely C Unlikely D Rare	1 Critical 2 Major 3 Moderate 4 Minor

8. Consultation

- 8.1. It is not felt that a public consultation is required for the delivery of the Wigmore site as the site is not near a residential area. The Planning Service will provide an update in the Cabinet report on the Call for Sites exercise which has been widely publicised. If the outcomes of the assessment work identify potential sites, the Cabinet report will include proposed details of consultation from mid-August to late September on site allocations for gypsy and traveller uses.

9. Climate change implications

- 9.1. Making planned provision for the Gypsy and Traveller community will limit the environmental impact of unregulated stays on other unauthorised encampments, including the reduction of pollution and damage to the natural environment.
- 9.2. Landscaping of the Wigmore site could provide some carbon capture and storage through screening and planting. This will be considered accordingly should plans progress at the Wigmore site.
- 9.3. Any planning application will need to be accompanied by a biodiversity and ecology study and proposals to meet statutory biodiversity net gain requirements.
- 9.4. Should Options 2 or 3 for the Wigmore site progress, renewables will be explored for the site including options for air or ground source heat pumps, solar photovoltaic panels and water saving devices for the utility blocks and wider site.

10. Financial implications

- 10.1. The recommendations relating to Options 2 or 3 for development of the Wigmore site, require an additional capital budget to be approved.

- 10.2. It should be noted that the capital budget requested does not consider any external funding that could be secured. At this stage funding cannot be guaranteed, but officers are confident that this can be secured which would therefore reduce spend of the capital budget.

11. Legal implications

- 11.1 The national Planning Policy for Traveller Sites requires local planning authorities, in producing their Local Plan, to identify and update annually a supply of sites over the plan period, i.e. specific 'deliverable' sites in the first five years against locally set targets, and 'developable' sites or broad locations from year six of the plan period. The submission version of the Medway Local Plan 2041 does not meet the full needs of Gypsy and Traveller and Travelling Show People households.
- 11.2 The Mobile Homes Act 1983 and 2013 provides the base legislation for occupation agreements and management of sites. The Control of Caravans Act 1960 (as amended) provides layout and management requirements.
- 11.3 All decisions made by the Cabinet can be the subject of a Judicial Review on public law grounds, in this specific instance the acknowledgement of the shortfall in the submitted version of the Medway Local Plan 2041 would be an important factor which should be given weight in Cabinet's decision whether or not to proceed with the recommended option. Failure to adequately consider relevant information in the decision-making process can give rise to a public law ground of challenge.

Lead officer contact

Becs Wilcox, Chief Housing Officer – rebecca.wilcox@medway.gov.uk
(Tel: 01634 333581)

Dave Harris, Chief Planning Officer – dave.harris@medway.gov.uk
(Tel: 01634 331700)

Appendices

Appendix A – Wigmore option 1

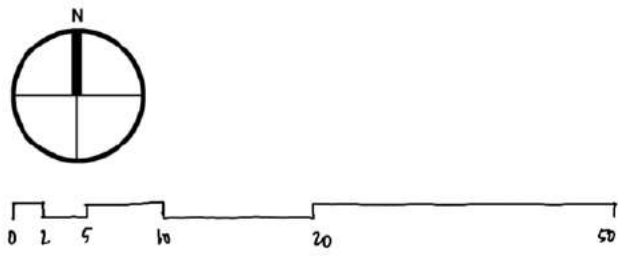
Appendix B – Wigmore option 2

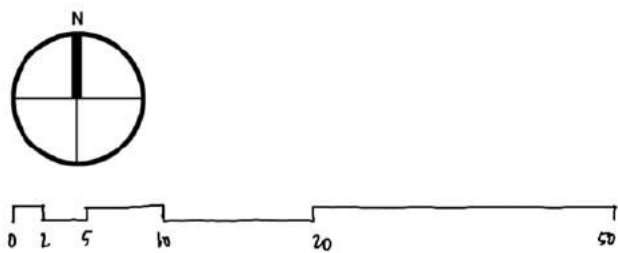
Exempt Appendix C – Exempt Information Financial Appraisal

Appendix D - Diversity Impact Assessment

Background papers

[Gypsy and Traveller Accommodation Topic Paper](#)





Diversity impact assessment

Appendix D

TITLE
Provision for Gypsy and Traveller Accommodation
DATE
9 June 2026
LEAD OFFICER.
Becs Wilcox, Chief Housing Officer – Housing Services & Dave Harris, Chief Planning Officer – Planning Services
1 Summary description of the proposed change
What is the change to policy / service / new project that is being proposed? How does it compare with the current situation?
The proposal is in two parts: 1.A recommendation for Members to approve development of the former Park & Ride Car Park in Wigmore into a permanent, Council managed Gypsy and Traveller site. The Wigmore site is currently occupied by a Gypsy and Traveller family group following unsuccessful possession proceedings by the Council in February 2025 and the granting of planning permission on appeal in June 2025. Development of the site would deliver a permanent Council managed site of up to ten pitches, together with the necessary infrastructure and facilities. This would allow the Council to regularise occupation through licences, introduce a fee structure, and implement formal management arrangements. The intention is for the current family group to occupy the new permanent site, with provision allowed for in the design for future expansion to meet increasing needs. The proposed provision would deliver a good quality, fully compliant site for the current and new occupants to help meet the needs of this cohort. 2.A recommendation for Members to consider the work carried out to identify additional options for Gypsy and Traveller sites; to provide greater certainty that the Local Plan will meet needs. This may include approval for consultation on additional site allocations. The emerging Local Plan provides a planning policy framework for guiding development in Medway up to 2041. It comprises a vision, strategic objectives, site allocations and development management policies. With regard to housing, the Local Plan aims to meet the housing needs of the community and national planning policy for Gypsy and Traveller sites requires Local Authorities to identify and seek to meet accommodation needs. The submission version of the Medway Local Plan 2041 does not meet the full needs of this cohort. Published correspondence between the inspectors, appointed to examine the Plan, sets out actions for the Council to identify a sufficient supply of land to meet the full needs.

Diversity impact assessment

2 Summary of evidence used to support this assessment

E.g. Feedback from consultation, performance information, service user.
E.g. Comparison of service user profile with Medway Community Profile

Gypsy and Traveller Accommodation Assessment.

3 What is the likely impact of the proposed change?

Is it likely to:

Adversely impact on one or more of the protected characteristic groups

Advance equality of opportunity for one or more of the protected characteristic groups

Foster good relations between people who share a protected characteristic and those who don't

(insert Yes when there is an impact or No when there isn't)

Protected characteristic groups (Equality Act 2010)	Adverse impact	Advance equality	Foster good relations
Age		Yes	Yes
Disability		Yes	
Gender reassignment			
Marriage/civil partnership			
Pregnancy/maternity		Yes	
Race		Yes	Yes
Religion/belief		Yes	
Sex			
Sexual orientation			
Care experience			
Other (e.g. low income groups)			

Diversity impact assessment

4 Summary of the likely impacts

Who will be affected?

How will they be affected?

The current site occupants include a high number of children who are attending local schools, so the establishment of a permanent site would allow them to continue their education in a familiar setting resulting in a positive impact. The provision of a site will also have a positive impact on the health and wellbeing of older people, allowing better and more consistent access to local services and support.

Gypsy and Travellers are known to generally marry and start families younger than non-travelling communities, often whilst travelling. Being able to live on a permanent site will allow expectant women and mothers of younger children a safe place from which to access consistent services (GP, midwife, health visitor etc.).

Travellers with physical disabilities will benefit from the provision of a permanent site by the availability of flat, level ground with accessible facilities.

5 What actions can be taken to mitigate likely adverse impacts, improve equality of opportunity or foster good relations?

What alternative ways can the Council provide the service?

Are there alternative providers?

Can demand for services be managed differently?

The proposed Wigmore site (and potential future provision) will aim to advance equality of opportunity for the Gypsy and Traveller community. With full management by the Council in place, there will be opportunities for resident engagement to foster good relations with the wider communities.

The provision of new sites will help to reduce the occurrence of unauthorised development and encampments, which in turn is anticipated to reduce any potential tensions with the settled community.

6 Action plan

Actions to mitigate adverse impact, improve equality of opportunity or foster good relations and/or obtain new evidence

Action	Lead	Deadline or review date

Diversity impact assessment

7 Recommendation

The recommendation by the lead officer should be stated below. This may be: to proceed with the change, implementing the Action Plan if appropriate, consider alternatives, gather further evidence

If the recommendation is to proceed with the change and there are no actions that can be taken to mitigate likely adverse impact, it is important to state why.

The recommendations are for Members to approve the development of the Wigmore site to provide 8 pitches, for 10 touring caravans within the current boundary and the option of expanding the site as a second, future phase.

In addition, for Members to consider further work to be carried out to identify additional options for Gypsy and Traveller sites, to provide greater certainty that the Local Plan will meet the identified needs

8 Authorisation

The authorising officer is consenting that the recommendation can be implemented, sufficient evidence has been obtained and appropriate mitigation is planned, the Action Plan will be incorporated into the relevant Service Plan and monitored

Assistant Director

Date of authorisation