

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](#)