

Council

15 October 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. This work is to be further considered through the Local Plan examination.

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 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.

The report was previously considered by the Cabinet on 4 August 2026, the decisions of which are set out at section 6 of the report.

The report was also considered by the Regeneration, Culture and Environment Overview and Scrutiny Committee on 13 August 2026, following the receipt of a call-in. Further details and minutes of the discussion are set out at section 7 of the report.

1. Recommendations

- 1.1. The Council is requested to note the decisions of the Cabinet, as set out at section 6 of the report and to note the outcome of the call-in considered by Regeneration, Culture and Environment Overview and Scrutiny Committee, as set out at section 7 of the report.
- 1.2. The Council is asked to agree to add **£2,684,000** to the Capital Programme (funded by prudential borrowing) to deliver the initial proposals set out in Option 3, which was agreed by the Cabinet on 4 August 2026.

2. Budget and policy framework

- 2.1. The decisions in this report are outside of the Council's current budget frameworks as an addition to the Capital Programme is being requested.
- 2.2. The decision to agree the addition to the capital programme set out in this report is a matter for Full Council.
- 2.3. 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.
- 2.4. 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].

3. Background

Wigmore Site

- 3.1. 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.
- 3.2. 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.
- 3.3. 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.

- 3.4. 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.
- 3.5. 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).
- 3.6. 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

- 3.7. 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 in the submitted Plan, 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.
- 3.8. 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. Correspondence from the Inspectors has raised queries on issues relating to this matter of provision for gypsy and traveller accommodation. The Matters, Issues and Questions published for the Phase 2 of the Local Plan Examination look at the issue of whether the Plan meets the needs of the specific housing requirements of the Gypsy, Travellers & Travelling Showpeople communities and the approach taken is justified, effective and consistent with national policy. There are a number of questions relating to need and supply and the proposed policy T10 in the submitted

Plan. The Council will be submitting a Hearing Statement on the Matters, Issues and Questions by 29 October to the Planning Inspectors. This will include clarification on areas to be considered as minor or major modifications to the Plan.

3.9. The Council has carried out work to seek to increase certainty on the supply of pitches and plots in the Local Plan. These steps included:

- Held a Call for Sites to seek to identify any further suitable and available sites for Gypsy and Traveller use
- Review of Council owned land to identify any suitable and available sites
- Assessment of the options for Compulsory Purchase Orders to secure use for Gypsy and Traveller households
- Assessment of the potential for intensification of existing sites, to increase capacity
- Assessment of the potential to secure pitches as part of strategic development sites
- Assessment of the options for use of land at Wigmore

Outcome of Call for Sites for Gypsy and Traveller and Travelling Showpeople

3.10. Following correspondence between the Inspectors appointed to examine the Medway Local Plan 2041 and the Council, the Planning Service carried out a review of land with potential for use for gypsy and traveller and travelling showpeople accommodation.

3.11. 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.

3.12. The Council received no submission sites, and the Council member's approach also received no follow up on suggested sites.

3.13. 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 member suggested sites were located in the Capstone Valley area, High Halstow, Cuxton, Luton, Lower Rainham bordering the estuary, and Rochester. These 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.

3.14. Alongside the Call for Sites exercise, the Planning Service carried out a review of its own landholdings with the objective of identifying deliverable and

developable sites for the first 10 years of the Plan. The approach to this work is set out below.

Site identification and screening

- 3.15. Planning officers used the latest Land Registry spatial data in a Geographic Information System to identify land in the Council's ownership. The Council reviewed practice in other Local Planning Authorities to inform its methodology, including minimum size site. Having discounted 1,176 sites that are smaller than 400 sqm, 978 sites remained for assessment.

Assessment

- 3.16. The next stage comprised an assessment as to the suitability, availability and achievability of each site. Policy B (paragraph 13) of the national 'Planning Policy for Traveller Sites' (December 2024)¹ 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.
- 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).

- 3.17. 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.

¹ <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites/planning-policy-for-traveller-sites>

- Presence of dense vegetation.
 - Topography
- 3.18. Most of these 423 sites were schools, highways or public realm which were discounted on the next iteration of assessment.
- 3.19. 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. On a more detailed assessment, these were largely found to be unsuitable on environmental, amenity or access grounds.
- 3.20. The only site emerging with potential as an allocation in the Local Plan is the former Wigmore Park and Ride site, which is the subject of this report. Noting Cabinet's support for the allocation of the Wigmore site for gypsy and traveller accommodation, the Planning Service will carry out focused consultation as a proposed main modification to the submitted plan.
- 3.21. Through the Local Plan, the Planning Service would seek to safeguard existing and consented gypsy and traveller sites, including designation on the policies map for the plan. It is considered that some of the existing and consented sites provide capacity for intensification to contribute to new supply through additional pitches, particularly to meet needs arising from family growth. The Planning Service will be providing further information on the capacity of existing sites and identifying where there is scope to increase accommodation. These could form part of the supply over the plan period through site allocations. This will be reported to the Local Plan Examination Inspectors and new proposals will be subject to a six week consultation period, in advance of a specific Examination hearing session on this matter.

4. Options

- 4.1. 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.
- 4.2. 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.

- 4.3. 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.
- 4.4. The second option, and the one that was agreed by Cabinet when it considered the report on 4 August 2026 is to firstly formalise the existing site within its current boundary as described in 4.3 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.
- 4.5. Officers commissioned architects Hazle McCormack Young LLP (HMY) to undertake a Stage 1 feasibility study and develop indicative concept layouts for the Wigmore site.
- 4.6. 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.
- 4.7. 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.
- 4.8. Please find below an options appraisal on the three options that were considered by the Cabinet:

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.

Option	Estimated Cost	Pros	Cons
			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	£2,684,000 (This assumes no grant funding, as a worst-case scenario) Costs for phase 1 only at this time, due to	- 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	Increased level of additional, future capital expenditure.

Option	Estimated Cost	Pros	Cons
to add another 6 pitches.	proposed timescales.	of identified need required 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).	

4.9. 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

4.10. 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.

- 4.11. 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 4.9 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).
- 4.12. 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.
- 4.13. 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.
- 4.14. The development of permanent Gypsy and Traveller sites is eligible for grant funding through the Homes England Social and Affordable Homes Programme (SAHP).
- 4.15. 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.
- 4.16. 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).
- 4.17. 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.
- 4.18. 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.
- 4.19. 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. Advice and analysis

- 5.1. 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.
- 5.2. 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.
- 5.3. 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.
- 5.4. 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.
- 5.5. 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.

- 5.6. 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.

6. Cabinet

- 6.1. The Cabinet considered the report on 4 August 2026 and the decisions of this are set out below.
- 6.2. The Cabinet noted the work that had been carried out to identify additional options for Gypsy and Traveller sites; to provide greater certainty that the Local Plan would meet needs.
- 6.3. 107/2026 – a The Cabinet agreed 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. The 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 addition below (Decision 108/2026), required to deliver the second phase.
- 6.4. 108/2026 – The Cabinet agreed 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.
- 6.5. The Cabinet noted the outcome of the Call for Sites exercise and review of Council owned land in its consideration of the options for the former Wigmore Park and Ride site. The Cabinet agreed to support a proposed minor modification to the Local Plan policies map to clarify the existing and consented gypsy and traveller sites to be safeguarded in accordance with policy T10 in the submitted draft Medway Local Plan.
- 6.6. 109/2026 – The Cabinet agreed to support a proposed minor modification to the Local Plan policies map to clarify the existing and consented gypsy and traveller sites to be safeguarded in accordance with policy T10 in the submitted draft Medway Local Plan.

7. Regeneration, Culture and Environment Overview and Scrutiny Committee

- 7.1. The Committee considered the report on 13 August 2026. This followed a call-in of the Cabinet decisions 107/206 and 109/2026, as set out at paragraphs 7.3 and 7.5 above. The draft minutes of the discussion are set out below.
- 7.2. The report advised the Committee of a notice of a call-in received from six Members of the Council regarding the Cabinet decisions made on 4 August 2026 on provision for Gypsy and Traveller accommodation.
- 7.3. The Chairperson stated that the call in was in respect of Cabinet decisions 107/206 and 109/2026 which referred to the provision for Gypsy and Traveller accommodation, and that the Committee would need to decide to do one of the following;
 - 1) accept the Cabinet decision and take no further action,
 - 2) refer the decision back to Cabinet for consideration setting out its reasons for doing so, or
 - 3) refer the decision to Full Council for consideration.
- 7.4. The Chairperson set out the procedure to be followed for this item, and asked the Committee for its agreement to have Councillor Shokar as an expert witness. After discussion this was put to the vote and agreed.
- 7.5. The Assistant Director introduced the report. The opposition spokesperson explained that the decisions had been called in due to: lack of public consultation; cost and capital requirement; appropriateness of the land for allocation as a gypsy and traveller site; and political expediency around the proposals and consideration of other options.
- 7.6. Councillor Shokar was given 5 minutes to address the Committee. He stated that he had spent the previous three years working closely with Gypsy, Roma and Traveller families in Medway and had witnessed the challenges experienced by families without a lawful and stable place to reside. He outlined the social and health inequalities experienced by families prior to occupying the Wigmore site, including limited access to education, healthcare and public services. He stated that greater stability had enabled children to attend school regularly, families to register with health services and community organisations to provide support. He referred to positive educational outcomes and examples of improved health interventions, arguing that stable accommodation had produced tangible benefits for the families concerned. He further stated that provision of accommodation for the Gypsy and Traveller community was consistent with the Council's obligations and its commitment to the Marmot principles.
- 7.7. This item was opened for debate. During the ensuing discussion it was reiterated, as stated in paragraph 3.7 of the report, that only Cabinet decisions could be called in. Therefore, decision no. 108/2026, which was scheduled to

be referred to full Council on 15 October 2026 for consideration, was not part of the call-in as all Members would have the opportunity to debate and vote on that at the full Council meeting.

- 7.8. **Legal costs** - In response to a question concerning the legal costs incurred from the previous unsuccessful attempt to remove gypsy and traveller families from this site, officers advised that the internal legal costs were estimated at approximately 140 hours, equating to just under £15,000 over three financial years. External counsel fees amounted to £36,750 plus VAT, with further costs arising from legal proceedings, including costs awarded against the Council (£60K) and a further legal invoice still awaited which was anticipated to be a further £60K.
- 7.9. **Relocation during development** - With reference to the 'decanting' of the current family group occupying the site, officers advised that discussions regarding temporary relocation had not yet taken place with residents and, consequently, the costs of any decanting arrangements were not yet known.
- 7.10. **Site fees** - In response to questions, officers advised that the current fees of £275 per week covered refuse collection and the portaloo facilities on the site, and confirmed that payments were currently up to date. It had been difficult to find private site comparators, but local authority owned sites were around £180 for single plots and £150 for double plots. It was pointed out that this site was being proposed for touring caravans, not static caravans / mobile homes. If agreed, residents would be subject to council tax, officers would see clarification as to whether it was being paid at the moment.
- 7.11. **Air quality** - In response to questions concerning the air quality and proximity to the motorway, officers advised that these matters had been examined during both the planning application and subsequent appeal process and that the Planning Inspector had found the site acceptable in terms of air quality, noise and residential amenity.
- 7.12. **Local Plan and consultation** - During discussion of the Local Plan, it was explained that extensive work had been undertaken through the Local Plan process, including multiple calls for sites and assessments of Council-owned land. Two separate calls for sites had failed to identify suitable privately-owned alternatives and the analysis undertaken was consistent with the detailed assessment methodology applied across all Local Plan allocations. Any ideas for alternative sites were still welcomed.
- 7.13. In response to concerns about lack of consultation, officers explained that consultation had taken place through the planning process, including site notices, neighbour notifications and appeal notifications. The Committee was informed that 33 objections from 32 households had been received in response to the planning application and that the application had been refused by the Council before subsequently being allowed on appeal. However the Council was required to comply with the Planning Inspector's appeal decision, which had concluded that the site was suitable for permanent Gypsy and Traveller use, and seek a practical solution that addressed both

planning obligations and resident needs. The Committee was reminded that there would be further consultation if the site was progressed and proceeded to apply for planning permission, and further opportunities to consult on the Local Plan.

- 7.14. There was still some concern expressed regarding the perceived cost of the proposals, the lack of a dedicated consultation exercise, and whether all reasonable alternatives had been fully explored. It was suggested that local residents would struggle to understand the level of expenditure proposed for the site.
- 7.15. **Housing responsibilities** - In response to questions, officers confirmed that provision of Gypsy and Traveller accommodation should be regarded as part of the Council's housing responsibilities and not as special treatment. The Council had a responsibility to meet the needs of all residents and should not differentiate between groups when addressing housing need. It was further confirmed that where families were living without adequate services or secure accommodation, the Council would be expected to take appropriate action, as would be the case of any other residents living in unsuitable conditions.
- 7.16. A proposal was put that the decisions be referred back to Cabinet for reconsideration, however on being put to the vote the proposal was not agreed.
- 7.17. A proposal was then put that having considered the call in, the Committee agreed to accept Cabinet decisions 107/2026 to 109/2026 and therefore take no further action, and on being put to the vote the proposal was agreed.
- 7.18. **Decision:**

The Committee accepted the Cabinet decision nos 107/2026 and 109/2026, and agreed to take no further action.

8. 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

Risk	Description	Action to avoid or mitigate risk	Risk rating
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
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

9. Consultation

- 9.1. The Local Plan Examination Inspectors have indicated that subject to the outcome of this Council meeting, it would expect the Council to carry out consultation on proposals to allocate sites for gypsy and traveller uses in the Plan. This would be a six week consultation publicised with all stakeholders and provide details of sites, existing or new, that the Council proposes for allocation. Information collected from the consultation will be reported back to Examination and published. An update is set out at 3.10 of this report on the Call for Sites exercise which has been widely publicised.

10. Climate change implications

- 10.1. 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.

- 10.2. 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.
- 10.3. Any planning application will need to be accompanied by a biodiversity and ecology study and proposals to meet statutory biodiversity net gain requirements.
- 10.4. 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.

11. Financial implications

- 11.1. The recommendations relating to Option 3 for development of the Wigmore site, as agreed by Cabinet, require an additional capital budget of £2,684,000 to be approved, funded by borrowing.
- 11.2. It should be noted that the capital budget requested does not consider any additional Government funding that could be secured. At this stage funding cannot be guaranteed, but officers are confident that this can be secured. If external funding is secured it will be used to fund the capital budget instead of borrowing, which would therefore reduce the amount of borrowing required.
- 11.3. Unless and until Council approves the addition to the capital programme, this scheme cannot progress as the expenditure does not fall within the capital budget agreed by Council in February 2026.
- 11.4. If the capital addition is agreed and funded from borrowing, the estimated borrowing cost including a Minimum Revenue Provision (MRP) will be around £151,000 per annum. Borrowing costs are a revenue charge and would fall outside the revenue budget agreed by Council in February 2026, therefore Full Council will be asked to approve an addition to the interest and finance revenue budget as part of the budget setting process for 2027/2028. This borrowing cost estimate has been calculated using current borrowing rates and capital cashflow projections, it should be regarded as indicative as actual costs will depend on market conditions and cashflow requirements at the time the borrowing is arranged. Borrowing illustrations indicate that borrowing £2.6 million could result in total repayments of approximately £5.6 million over a 50 year period, including both interest and principal repayments.
- 11.5. Additional capital investment may be required in future years as amenities, such as the bathroom block, will eventually need to be upgraded or replaced. The current outline plan indicates that additional capital investment will be required at year 10, but this may be subject to change.

- 11.6. There are other potential revenue costs that may be incurred during the build that are currently unbudgeted, e.g. the cost of decanting the current occupants.
- 11.7. A revenue budget will be required once the site is handed over (currently estimated to be 2029/2030). Rental income will offset some of the site costs but is unlikely to cover all the relevant expenditure such as management costs and repairs and maintenance. The service will need to raise this pressure as part of the MTFO and request a revenue budget allocation.

12. Legal implications

- 12.1. 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.
- 12.2. 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.
- 12.3. 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 2

Appendix B – Wigmore option 3

Exempt Appendix C – Exempt Information Financial Appraisal

Appendix D - Diversity Impact Assessment

Background papers

[Gypsy and Traveller Accommodation Topic Paper](#)

[Call-in: Provision for Gypsy and Traveller Accommodation, Regeneration, Culture and Environment Overview and Scrutiny Committee, 13 August 2026](#)