

Consultation Report



Gypsy and Traveller Site Pitch Allocations Policy



Consultation period: 4 February to 30 March 2026

kent.gov.uk/pitchallocationpolicy



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1. Executive summary

From 4 February to 30 March 2026, Kent County Council (KCC) ran a public consultation, seeking views on its draft Pitch Allocation Policy.

During the consultation period the consultation webpage was visited 1,301 times by 1,249 visitors. The consultation received 11 responses.

Key findings:

- The majority of respondents feel the draft Policy clearer and more structured, with many agreeing it is understandable and the process for apply for a pitch is clearer.
- Some consultees welcome recognition of GRT culture, but warn that heavier alignment with “bricks and mortar” models and documentary requirements may not reflect lived realities or may create barriers.
- Consultees question whether fairness and transparency will be achieved *in practice* without clearer safeguards, consistency mechanisms, and transparency of scoring / decision review.

In response to the consultation feedback, consideration will be given to targeted refinements to the draft Policy and supporting documents. These include:

- Clarifying how evidence and verification checks will be applied in a fair and proportionate way.
- Adding voting authority certificates to the list of approved ID.
- Ensuring the government’s planning policy definition of Gypsy and Traveller is reflected throughout the Policy.
- Strengthening explanations around the points system and waiting list transparency.
- Ensuring the application process is accessible in practice as well as on paper.

These actions will help ensure the Policy is robust, legally sound, and delivers a fair and transparent process for applicants and wider stakeholders.

This report, along with the final Pitch Allocation Policy, supporting documents, and Equality Impact Assessment are expected to be presented to Members at the Growth, Economic Development and Communities Cabinet Committee on 5 May 2026. The Cabinet Member for Community and Regulatory Services will take the final decision on whether to approve the new Policy.

Once approved, the final Pitch Allocation Policy will be published on KCC’s website.



2. Introduction

This document provides a summary of the feedback received to Kent County Council's (KCC) public consultation on a new draft Gypsy and Traveller Pitch Allocation Policy.

The Policy sets out how we allocate pitches when they become available and how we decide who is most in need. It is essential to the good management of KCC's sites and helps make sure they provide a safe environment for Gypsy, Roma and Traveller (GRT) communities. The current version of the Policy was last updated in 2023.

The main changes being proposed are:

- Updates to make the Policy clearer and more like the 'bricks and mortar' housing allocation policies operated by District and Borough Councils in Kent.
- How we handle applications, what documents applicants must provide, and how they are placed on the waiting list.
- Updated application form which asks the right questions to support the revised Policy.

More information on the proposed changes, along with the draft Policy and application form can be found on the consultation webpage: <https://letstalk.kent.gov.uk/grt-pitch-allocation-policy>.

This Policy only impacts on future people applying to live on KCC owned sites. The changes being proposed would not impact current site residents unless they are looking to transfer between our sites or they are a young person who currently lives on one of our sites with a parent(s) or guardian and wishes to apply for their own pitch when they reach 18 years old.

KCC owns and manages seven sites designated for GRT accommodation. These sites provide 128 pitches of varying size. We are responsible for the allocation of these pitches, which are high in demand. Council owned GRT pitches are for Gypsies and Travellers who cannot meet their accommodation need via private provision.

KCC does not have a statutory responsibility to provide accommodation for GRT communities. This responsibility lies with District and Borough Councils as the Housing Authority.

The proposals in this consultation relate only to the seven GRT sites operated directly by KCC. They do not apply to the eight sites run by the District and Borough Councils in Kent.



3. Consultation process

The consultation was hosted on Let's Talk Kent, KCC's engagement website: <https://letstalk.kent.gov.uk/grt-pitch-allocation-policy>. Feedback was captured via an online questionnaire. A Word version of the questionnaire was provided on the webpage for people who didn't want to complete the online version. Feedback could also be provided in-person, by telephone, email or letter.

All consultation material included details of how people could contact KCC to ask a question, request hard copies or alternative format.

Four in-person drop-in events were held during the consultation period at libraries close to KCC GRT sites. These events provided the opportunity for people to speak to a member of the GRT Resident Service team, ask any questions and provide their feedback.

The consultation document explained the reasons for the proposed changes and included a table summarising them by section. It also contained the full draft Policy, application form and the current Policy. The webpage also featured two videos outlining the consultation process and key proposals.

A consultation stage Equality Impact Assessment (EqIA) was carried out to assess the potential impact the new Policy could have on the protected characteristics. The EqIA was available as one of the consultation documents and the questionnaire invited consultees to comment on the assessment that had been carried out. The responses to this question can be found in section 7 of this report.

To raise awareness of the consultation and encourage participation, the following activities were undertaken:

- Paper copies of the consultation material, including the questionnaire delivered to all KCC site residents.
- E-mails and texts sent to KCC site residents requesting information electronically with a reminder two weeks before the consultation closed.
- Applicants on the current waiting list contacted to arrange for a paper copy of the consultation document to be delivered (advised all material available online as well) with a reminder two weeks before the consultation closed.
- Site Managers identified potential site residents with older children (as future applicants) and made them aware of the consultation.
- Emails sent to stakeholder organisations and partners to make them aware of the consultation and asking them to promote through their networks.
- Media release: <https://news.kent.gov.uk/articles/consultation-opens-on-kccs-gypsy-and-traveller-sites-pitches-policy2>



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- Poster's displayed in Kent libraries and Gateways.
- Copy of poster sent to Kent Citizens Advice Bureaus (CAB).
- Organic social media from KCC's corporate Facebook, X and Nextdoor channels.
- Promoted to Kent Town and Parish Councils through the Kent Association of Local Councils (KALC).
- Briefing email to all KCC Members with GRT sites in their constituencies.
- Link to consultation webpage from service pages on Kent.gov.

A summary of interaction with the consultation website and documents can be found below:

- 1,301 visits to the consultation webpage by 1,249 visitors.
- 95 downloads of the consultation document.
- 20 views of the video introducing the consultation and 26 views of the video explaining the proposals.
- 14 downloads of the Word version of the consultation questionnaire.
- 12 downloads of the consultation stage Equality Impact Assessment.

Organic posts via KCC's corporate channels had a reach of 101,526 on Facebook and there were 68,410 impressions on X and Nextdoor. Reach refers to the number of people who saw a post at least once and impressions are the number of times the post is displayed on someone's screen. (Not all social media platforms report the same statistics).



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Figure 1. Examples of social media posts

Kent County Council's post


Kent County Council
4 February · 🌐

📌 Today we have launched a consultation on our Pitch Allocation Policy for KCC owned Gypsy and Traveller sites. Changes are being proposed to help make sure pitches are allocated in a fair, transparent and consistent way. More information on the proposals and how to take part can be found on our website. We have also arranged drop-in events where you can speak to a member of the team, ask a question and tell us your views.

👉 Visit our website www.kent.gov.uk/pitchallocationpolicy for dates and times.



**Pitch Allocation Policy for KCC-owned
Gypsy and Traveller sites**
Public consultation running until 30 March
Have your say!
www.kent.gov.uk/pitchallocationpolicy



**Drop-in
event**

**KCC's Pitch Allocation Policy for Gypsy
and Traveller sites**
Public consultation

Join us at the Canterbury Library in the Beaney on
Tuesday 17 March from 10am to 12pm.
www.kent.gov.uk/pitchallocationpolicy



Kent County Council · Let's talk Kent C&E · 16 Mar

Join us at our final drop-in event on Tuesday 17 March from 10am to 12pm at Canterbury Library in the Beaney. The team will be there to answer your questions and listen to your views on the proposed changes to how pitches are allocated on KCC-owned Gypsy and Traveller sites.

📄 Find out more on our website
www.kent.gov.uk/pitchallocationpolicy.

Posted to **Subscribers of Kent County Council** in 12 areas

👍 Like 💬 Comment ➦ Share

Be the first to react

No comments



Gypsy and Traveller Site Pitch Allocation Policy

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Figure 2: Consultation poster

Pitch Allocations Policy for Gypsy and Traveller sites

Public Consultation

Have your say!

We are updating our policy for how pitches are allocated on KCC owned Gypsy and Traveller sites. Changes are being proposed to make sure pitches are allocated in a fair, transparent and consistent way.

We want to hear your views on the draft policy. Visit www.kent.gov.uk/pitchallocationpolicy to find out more and complete the questionnaire.

We are also hosting four public drop-in events:

Date	Timings	Location
Saturday 14 February	10am to 12pm	Kent History and Library Centre (James Whatman Way, Maidstone ME14 1LQ)
Thursday 26 February	10am to 12pm	Sevenoaks Library (Buckhurst Lane, Sevenoaks TN13 1LQ)
Friday 6 March	3pm to 5pm	Dover Library (Dover Discovery Centre, Market Square, Dover CT16 1PH)
Tuesday 17 March	12pm to 2pm	Canterbury Library in the Beane (The Beane House of Art & Knowledge, 18 High Street, Canterbury CT1 2RA)

If you can't make the events and have a question, need a paper copy of the consultation material or an alternative format, please email gypsy.traveller@kent.gov.uk or call 03000 42 15 67 (Monday to Friday, 9am to 5pm)

Consultation closes 30 March 2026
www.kent.gov.uk/pitchallocationpolicy





Points to note

- Consultees were given the choice of which questions they wanted to answer / provide comments on. The number of consultees providing an answer for each question is provided throughout this report.
- Due to the small number of responses, consultees answers to the postcode and equality monitoring (demographic) questions have not been included in this report.
- Participation was self-selecting and this needs to be considered when interpreting responses.
- As the response is weighted towards non-site residents, feedback related to direct user experience of the Policy should not be assumed to reflect the views of site residents as a whole.

4. Who responded to the consultation?

There were 11 responses to the consultation in total. Nine questionnaire responses (online), one open response provided by a site resident at one of the consultation events and one emailed organisation response from Friends, Families and Travellers. The open and emailed responses have been analysed alongside the open ended feedback received within the consultation questionnaire.

The first question asked consultees to select from a list the option that best described how they were responding to the consultation.

Are you responding ...? (Base: 9)	Number of responses
As a member of the public not living on a Gypsy and Traveller site	6
As a resident of a Kent County Council (KCC) owned Gypsy and Traveller site	1
As a Gypsy or Traveller living on a private site or in bricks and mortar	1
Something else (Parish Councillor, local resident and past business owner)	1



Consultation awareness

The most common means of finding out about the consultation was an email from KCC (4), followed by social media (3) and from the GRT Resident Service (2).

How did you find out about this consultation? (Base 9)	Number of responses
An email from Kent County Council (KCC)	4
Social media (e.g. Facebook, X, Nextdoor)	3
From the GRT Resident Service team	2
From my Parish / Town / Borough / District Council	1
Kent.gov.uk website	1

Please note, this question allowed consultees to select more than one response option, so the total number of responses exceeds the number of consultee.

5. Feedback on the proposal

Ease of understanding of the proposed Policy

Seven consultees agreed that the new draft of the Pitch Allocation Policy is easy to understand, and two said it is 'partly' easy to understand.

Consultees were asked if they had any suggestions on how to make the Policy easier to understand. Two consultee provided comments, which are presented below in their own words:

“The current content is straightforward.”

“Overall, I welcome the intention to make the Pitch Allocation Policy clearer, more transparent, and more aligned with wider housing allocation frameworks. The emphasis on evidence-based decision-making and prioritising those most in need is positive in principle.

However, I have concerns about how this Policy operates in the wider real-world context, particularly in relation to unauthorised development and planning enforcement.

The document states that the aim is to ensure fairness and consistency, yet in practice there is a perception that unauthorised developments are not addressed in a timely or effective manner. Delays in enforcement can result in developments becoming established before meaningful action is taken.



This risks undermining confidence in the system and creates a sense that those who follow the correct application processes may be disadvantaged compared to those who do not.

While I appreciate that this Policy relates specifically to allocation rather than enforcement, the two are closely linked. If access to authorised pitches is limited, complex, or slow, it may unintentionally contribute to unauthorised development. Conversely, where enforcement is not timely or consistent, it risks weakening the overall effectiveness of allocation policies.

I would therefore encourage Kent County Council to:

- Consider how this Policy aligns with planning enforcement across Kent
- Ensure there are clear and accessible pathways into authorised sites to reduce pressure towards unauthorised development
- Strengthen coordination between allocation processes and enforcement teams
- Provide greater transparency around how fairness is maintained between applicants who follow due process and those who do not

I also note the increased emphasis on evidence and verification. While this may improve robustness, it is important that the requirements remain proportionate and accessible, particularly for applicants who may face barriers in providing documentation”

Consideration of GRT community and its culture

Seven consultees agreed that the draft Policy adequately considers the GRT community and its culture, and two partially agreed.

Consultees were asked if they had any suggestions on how we can make sure the Policy adequately considers the GRT community and its culture. Two consultees provided an answer to this question. Their responses are presented below in their own words:

“The community by its culture and heritage is mobile and therefore having permanent rights to a place should be the exception rather than the rule. It makes sense if there are school age children but the place should be linked to attendance at school. If permanent places are taken then one might argue that they are no longer of the GRT community.”

“The draft Policy recognises Gypsy, Roma and Traveller (GRT) communities and their cultural identity, which is important and welcome. In particular, the acknowledgement of diversity within GRT communities and the inclusion of



culturally relevant considerations such as family structures and lifestyle is positive.

However, I am not fully convinced that the Policy consistently reflects the practical realities of GRT culture in its operation.

The increased emphasis on documentation, verification, and alignment with “bricks and mortar” housing policies may not always be appropriate for GRT communities, whose way of life can differ significantly from settled housing models. There is a risk that a more rigid, administrative approach could unintentionally create barriers for some applicants, particularly those with more traditional or mobile lifestyles.

At the same time, it is important that cultural considerations are balanced with fairness, transparency, and consistency in how the Policy is applied. The system must ensure that all applicants are treated equitably and that the process does not inadvertently create advantages or disadvantages based on how individuals engage with it.

To strengthen the Policy, I would suggest:

- Ensuring that evidence and documentation requirements remain proportionate and flexible where appropriate
- Providing clear guidance and support for applicants who may struggle to meet administrative requirements
- Continuing to recognise the importance of extended family, community ties, and cultural living arrangements
- Ensuring that cultural considerations are applied consistently alongside clear expectations around conduct and compliance

Overall, while the Policy makes positive steps in recognising GRT communities, further thought may be needed to ensure that its practical application genuinely reflects cultural realities without compromising fairness and consistency.”

Aims of the Policy

Six consultees agreed that the draft Policy meets the aims set out in it. While three partly agreed.

Consultees were asked if they had any comments or suggestions on the aims. Three provided an answer. Their responses are presented below in their own words:

“Put the rent up, or charge more to gain the money spent on making the pitches.”



“There are insufficient checks to say that the pitches are fairly allocated and the process appears very lax.

Places should only be allocated to resident UK citizens with all others not entitled to a permanent place. Ideally they should hold a UK passport. They can remain mobile.

A legal declaration should be required, enforceable in law, declaring that the applicant, nor any of their family, owns no other property in the UK, the Republic of Ireland or other country. Further, a supplementary declaration that they have no other rented accommodation either, to include social housing elsewhere.”

“The draft Policy sets out clear and appropriate aims, and in principle these are positive. The focus on making best use of limited pitches, allocating based on need, and ensuring transparency are all important objectives. However, I am not fully convinced that the Policy, as drafted, will consistently achieve these aims in practice.”

Exclusions for applying for a pitch

Seven consultees agreed with the exclusions for applying for a pitch set out in the draft Policy and two partly agreed.

Consultees were asked if they had any comments or suggestions on the exclusions for applying for a pitch. Three consultees answered this question, and one provided feedback via email. Their responses are presented below in their own words:

“Put the rent or cost up further.”

“Whilst the checks from the current list are good and aimed at protecting KCC and its staff, these are insufficient currently to weed out bad actors misusing the system. Alongside criminality checks in the UK the applicant should be required to authorise checks with both the Garda in Ireland and Interpol.

The current checks should be expanded to include the following:

- Their National Insurance number
- A check with Irish authorities as to any social housing or benefits being received
- The previously mentioned check that they do not own or lease any other property or their family in or outside the UK
- A declaration of any benefits being received in the UK
- A commitment that any children under 18 will attend school or pitch may be terminated



- Whilst it is good KCC will check for any debt to the County Council this should be extended to include debt to any public body or fines outstanding.
- No recent county court judgements against them, say 5 years
- Antisocial behaviour exclusion should be extended to 10 years
- No participation in illegal/unauthorised encampments on public or private land in last 5 years across the UK
- No involvement at all in illegal sports such as Hare coursing.
- No weapons to be held unless legally certified. “

“I agree that there should be appropriate exclusions in place to ensure that Gypsy and Traveller sites remain safe, well-managed, and sustainable communities. It is reasonable that serious anti-social behaviour, criminal activity, or breaches of previous agreements are taken into account when assessing applications.

However, I have concerns about the proposed extension to exclude applicants who are subject to a current or “live” police investigation.

An investigation does not in itself establish guilt, and there is a risk that this approach could lead to decisions being made on the basis of unproven allegations. This may not be proportionate or fair, part”

“1. Unacceptable Behaviour (P. 15) – to be made clear to KCC, the Police and to applicants that they only need to disclose unspent convictions, not previous, spent convictions. Do KCC also do the same police checks on anyone else applying for bricks and mortar social housing?

<https://unlock.org.uk/casestudy/case-study-challenging-misleading-question-council-housing-reference/>

1.a Unauthorised Encampment clause– *“Setting up an unauthorised encampment on KCC land (including highways) within the last 3 years and behaving anti-socially whilst doing so or forcing the council to incur legal cost.”* Do they mean anyone who has been on a UE regardless of whether there was alleged anti-social behaviour? If so, why are they excluding people from applying for a pitch because they have been forced to set up a UE due to lack of council provision?

2. Other Considerations (P. 15) promoting a balanced community on site with regard to religious practices, kinship, lifestyle and existing groups on the site. KCC has a duty under the Equality Act 2010 to foster good relations between communities.

2.b In general social housing, are people vetted on their suitability for moving into a home and do existing residents have any say in who their neighbours



are? How is this applied practically? For example, referring to mixing of ethnic and cultural groups and would not consider it suitable for someone from the Irish Traveller community to move onto a site that is predominantly Roman Gypsy or other identified 'GRT' group?

2.c KCC refer to the planning policy definition of Gypsy or Traveller -

Therefore are New Travellers able to apply on equal grounds for a pitch on any of KCC's sites, as they fit the definition given by government?"

Waiting list

Consultees were asked if they had any comments or suggestions on the waiting list. Two consultees answered this question. Their responses are presented below in their own words:

"Special needs should be excluded from the points list for two reasons. First as you could argue that these sites are inappropriate for such children. Second because it creates a game to jump up the list by fabricating the special needs which has become an epidemic and a huge burden on the public. Last, all people that will live on the pitch should be listed and validated by verifiable evidence. No other people can reside on the pitch for more than 3 days. If more days are needed then KCC permission must be sought."

"The proposed waiting list process is clearer and more structured than the current approach, which is positive. A points-based system and defined process for validating applications should help improve consistency and transparency in principle. However, I have some concerns about how this will operate in practice.

Firstly, placing full responsibility on applicants to keep their contact details up to date may disadvantage some individuals, particularly those with more transient living arrangements or limited access to stable communication methods. There is a risk that applicants with genuine need could miss opportunities simply due to missed contact, rather than lack of eligibility.

Secondly, while allocating pitches based on the highest number of points provides a clear framework, there should be greater transparency around how points are applied, reviewed, and, where necessary, challenged. Applicants should be able to clearly understand their position on the waiting list and how decisions are made.

I would also suggest that consideration is given to:

- Providing periodic reminders or check-ins with applicants to confirm their details remain current



- Allowing more than one attempt or method of contact before removing or bypassing an applicant
- Offering clear feedback to applicants on their points score and any changes over time
- Ensuring there is a straightforward and accessible process to challenge or review decisions

Finally, it is important that the waiting list system operates in a way that is perceived as fair. If applicants are required to follow a structured and potentially lengthy process to access authorised pitches, it is essential that this is supported by consistent and effective wider processes, so that those engaging properly with the system are not disadvantaged.

Overall, the approach is a positive step towards greater clarity, but safeguards and flexibility will be important to ensure it works fairly in practice.”

Clarity of the pitch allocation process

Eight consultees agreed that the draft Policy makes the process for pitch allocation clear and one partly agreed.

Consultees were asked if they had any suggestions on how we can make the applications process clearer or if they would like to provide comments on the application process. Two consultees provided an answer to this question, and one provided a response by email. Their responses are provided below in their own words:

“Include the previous comments so that applicants will know what to expect.”

“The draft Policy does make the application process clearer than before, and the step-by-step explanation is helpful. The introduction of support, such as the monthly drop-in session, is also a positive addition.

However, while the process is clear on paper, there are some practical considerations that may affect how accessible it is in reality.

For example, the reliance on a monthly drop-in session in Maidstone may not be convenient or accessible for all applicants across Kent. Travel, cost, and personal circumstances may limit the ability of some individuals to attend in person. It may be beneficial to consider additional locations or alternative forms of support.

In addition, the level of detail and documentation required throughout the application process may be challenging for some applicants, particularly those with lower literacy levels or more complex living arrangements. While support is mentioned, it will be important to ensure that this is readily available, well-publicised, and responsive to individual needs.



To strengthen this section, I would suggest:

- Expanding access to in-person support beyond a single location
- Offering more flexible support options, such as outreach or additional remote assistance
- Ensuring clear, simple guidance is provided alongside the application process
- Monitoring whether applicants are able to successfully complete the process without undue difficulty

Overall, the process is clearly set out, but its effectiveness will depend on how accessible and supportive it is in practice.”

“**3. Proof of Identification (P.18)** – many people from Gypsy and Traveller communities may not have any of the ID listed in the document. KCC should include the [Voting Authority Certificate](#) on the list of approved ID.”

Pointing and evidence requirements

Consultees were asked for any comments or suggestions on the pointing and evidence requirements. Four consultees provided feedback, two via the questionnaire, one via the in-person event and one by email.

Feedback from the in-person event indicated that the consultee did not agree with the points system, as it does not consider the family ‘links of existing residents. They said that where residents are related, they would prefer pitches to be allocated to other family members rather than to people who are not known to them.

Responses to the questionnaire and by email are presented below in consultees’ own words:

Only genuine GRT community members should be pointed.

Unauthorised/illegal encampments should not be rewarded because they have no ablution facilities or because they are private. Both categories should actually reduce the pointing score to discourage them. (Matched to this policy should be a more robust planning enforcement action plan with the number of illegal GRT development sites growing across the south east)

Fears for personal safety should be excluded as it creates another game to make false allegations to jump the queue.

Education arrangements should only count on pointing where attendance record is good.

Children with disabilities should be excluded from pointing unless it is a physical disability to avoid further queue jumping.”



“The introduction of a structured points-based system is a positive step and should help ensure that pitches are allocated based on need in a more transparent and consistent way. However, I have concerns about the level and rigidity of the evidence requirements across several of the criteria.

While it is important that decisions are evidence-based, the requirement for “clear, undeniable proof” in all cases may be too restrictive in practice. Some applicants may have genuine and significant housing needs but may struggle to provide formal documentation, particularly in areas such as:

- Existing accommodation – for example, those living on informal or unauthorised sites may not be able to provide formal contact details or documentation
- Welfare considerations – individuals experiencing intimidation or harassment may not always have formal records or crime reference numbers
- Medical conditions – requiring NHS letters (rather than allowing GP or other professional input) may create delays and additional barriers
- Financial and identity documentation – the breadth of documents required may be difficult for some applicants to provide, particularly those with less stable circumstances

There is a risk that the system could favour applicants who are better able to navigate administrative processes, rather than those with the greatest need.

In addition, I note that no points are awarded for local connection under the new system. While I understand the intention to prioritise need, this may have implications for community cohesion and local ties, and it would be helpful to understand how this balance will be managed.

I would suggest the following improvements:

- Allowing a degree of flexibility in evidence requirements where appropriate, including accepting a wider range of supporting information
- Providing clear guidance on what alternative evidence may be acceptable where formal documentation is not available
- Ensuring that professional judgement can be applied alongside documentary evidence in certain cases
- Reviewing whether some criteria may unintentionally disadvantage particular applicants

Finally, it is important that the system is not only fair in design but also perceived as fair in practice. If the process for accessing authorised pitches is highly structured and evidence-heavy, it should operate alongside consistent wider processes to ensure that those engaging properly with the system are not disadvantaged.



Overall, while the framework is logical and structured, greater flexibility and proportionality in evidence requirements would help ensure it operates fairly in real-world circumstances.”

“4. Points Rating (P. 19) – “*Unauthorised encampment roadside or development without running water and/or toilet facilities. 20 Contact details of landowner or Local Authority. Issued Section 77 or Section 78 Notice.*”

Should this also include [Section 55 of the CPR](#) too?

4.a. Points Rating relating to children – Do the points refer to each individual child and is there a cap on how many children are allowed to be catered for on a pitch? Also, there should be a section relating to home educated children, not just those who attend school.

4.b. Time on waiting list – Does the waiting list continue into the new policy once the consultation is over the new document accepted, or will the waiting list start from scratch?”

References and verification checks

Five consultees provided feedback on the proposed references and verification checks, three via the questionnaire and one by email. Their responses are presented below in their own words:

“Take 3 different types of ID. If no ID, no pitch.”

“Verification to include previous history of payment of Council tax”

“Alongside criminality checks in the UK the applicant should be required to authorise checks with both the Garda in Ireland and Interpol.

The current checks should be expanded to include the following:

- Their National Insurance number
- A check with Irish authorities as to any social housing or benefits being received
- The previously mentioned check that they do not own or lease any other property or their family in or outside the UK
- A declaration of any benefits being received in the UK
- A commitment that any children under 18 will attend school or pitch may be terminated
- Whilst it is good KCC will check for any debt to the County Council this should be extended to include debt to any public body or fines outstanding.
- No recent county court judgements against them, say 5 years
- Antisocial behaviour exclusion should be extended to 10 years



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- No participation in illegal/unauthorised encampments on public or private land in last 5 years across the UK
- No involvement at all in illegal sports such as Hare coursing.
- No weapons to be held unless legally certified.”

“The inclusion of references and verification checks is understandable and important to ensure that applications are assessed accurately and that sites remain safe and well-managed.

However, I have some concerns about the scope and proportionality of the checks proposed, particularly in relation to how certain types of information may be used in decision-making.

In particular:

- Police checks and intelligence – The use of police intelligence, warning markers, and ongoing investigations raises concerns about fairness and proportionality. Such information may not always be substantiated or lead to formal action yet could significantly influence an application outcome. It would be important to ensure that decisions are not made solely on unverified or low-level intelligence and that clear thresholds are in place for how this information is used.
- Broad data sharing and verification – The range of checks across multiple agencies (including financial, medical, and internal intelligence systems) is extensive. While verification is important, this level of scrutiny may feel intrusive and could deter some applicants from engaging with the process. Clear communication about how data is used, stored, and assessed will be essential.
- Risk of inconsistency – Where multiple sources of information are considered, there is a risk of inconsistent interpretation unless clear guidance and safeguards are in place. Applicants should have confidence that similar circumstances will be treated in the same way.
- Opportunity to respond – It is important that applicants are given a fair opportunity to respond to any adverse information identified through these checks before a final decision is made.

To strengthen this section, I would suggest:

- Clear guidance on how police intelligence and non-conviction information will be weighted and applied
- Ensuring that decisions are based on verified and relevant evidence, with appropriate safeguards in place
- Providing transparency to applicants about what checks are carried out and how this may affect their application



- Ensuring a clear and accessible right to challenge or appeal decisions arising from these checks

Overall, while verification processes are necessary, they should be applied in a proportionate, transparent, and consistent manner to ensure fairness and maintain confidence in the system.”

“5. References and Verification Checks (P. 22) – Credit checks with KCC intelligence. What does this mean? What are KCC checking?”

5.a Trading Standards databases – Why are KCC checking these? How is this relevant and would they check other people applying for general social housing?

5.c Confirmation with schools – Should also include deregistered children so EMTAS or Traveller Education need to be included.

5.d Police checks – What is a warning marker? Or intelligence flags? Is this something also carried out with other social housing applicants? What is the legality of a warning marker and keeping that information on a database and if it should be shared outside of the police force?”

Additional changes and anything else about the draft Policy

Consultees were asked if they have any comments on the rest of the changes being proposed or if there was anything else they would like to tell us about the draft Policy. Four consultees provided an answer to this question and one provided feedback via email. Their responses are provided below in their own words:

“Just recoup more money by putting the price up. If any taxpayer’s money is spent, it should be recouped.”

“Crucial to have proof of identity checks”

“No appeals should be allowed.

The Equality Act reference should be removed as this policy in itself is discriminatory for the benefit of one community.

A commitment that any children under 18 will attend school or pitch may be terminated

Whilst it is good KCC will check for any debt to the County Council this should be extended to include debt to any public body or fines outstanding.

No recent county court judgements against them, say 5 years

Antisocial behaviour exclusion should be extended to 10 years

No participation in illegal/unauthorised encampments on public or private land in last 5 years across the UK



No involvement at all in illegal sports such as Hare coursing.

No weapons to be held unless legally certified.”

“Overall, the draft Policy represents a clear effort to introduce greater structure, consistency, and transparency into the allocation of pitches, which is welcome.

However, I would like to raise the following comments on specific proposals and the overall approach:

- Alignment with housing allocation schemes – While aligning with District and Borough Council housing policies may improve consistency, it is important to recognise that Gypsy and Traveller accommodation needs and cultural circumstances can differ significantly from “bricks and mortar” housing. Care should be taken to ensure that this alignment does not reduce necessary flexibility.
- Debtors – The approach to applicants with outstanding debts appears more balanced than previously, particularly where housing need may outweigh the debt. However, it would be helpful to clarify how this balance will be assessed in practice to ensure consistency and fairness.
- Removal of interviews – Removing the interview stage may streamline the process, but it also removes an opportunity for applicants to explain their circumstances in more detail. This could be particularly important where documentation is limited or where individual situations are complex. Consideration could be given to retaining some form of discretionary engagement where needed.
- Visit to site/pitch (top scorer only) – While efficient, limiting visits to only the top-scoring applicant may reduce transparency and flexibility. There may be benefit in allowing a small number of top applicants to view the pitch to ensure the best overall match and avoid delays if an offer is declined.
- Appeals and complaints – The inclusion of more detail is positive. It will be important that this process is accessible, clearly explained, and genuinely independent to maintain confidence in decision-making.

More broadly, I would emphasise that the success of this Policy will depend not only on its design, but on how it operates in practice.

In particular, there is a need to ensure that:

- The system is perceived as fair and consistent by all communities
- Those who follow the correct processes are not disadvantaged
- Allocation processes are considered alongside wider planning and enforcement activity



If authorised pitch allocation is highly structured and evidence-driven, but wider enforcement of unauthorised development is not timely or consistent, this risks undermining confidence in the overall system.

In summary, the Policy is a positive step towards greater clarity and structure, but careful attention is needed to ensure that it remains flexible, proportionate, and fair in practice, and that it operates effectively within the wider context in which it sits.”

“**6. Decision not to offer** (P. 23) – How is this decided if not based on the points rating? Who decides the criteria and under what evidence?”

6. Application form

Three consultees provided feedback on the proposed application form (two via the questionnaire and one by email). Their responses are presented below in their own words:

“It looks OK but needs the suggested amendments so that the applicant knows what is expected.”

“The revised application form appears more comprehensive and better aligned with the draft Policy, and it is helpful that additional guidance is provided through the Supporting Information document. The inclusion of questions relating to health, caring responsibilities, and living arrangements should assist in building a clearer picture of applicants’ needs.

However, there are some concerns regarding the level of detail and volume of information required.

The application form, together with the supporting evidence requirements, is extensive and may be challenging for some applicants to complete fully and accurately. This is particularly relevant for individuals who may have lower literacy levels, limited access to documentation, or more complex or informal living arrangements. There is a risk that the process could become overly administrative and act as a barrier to those most in need.

In particular:

- The requirement for detailed financial, identity, and household information may be difficult for some applicants to provide in full
- Questions relating to health and medical conditions rely heavily on formal evidence, which may not always be readily accessible
- The breadth of supporting documentation required may feel disproportionate in some cases



While the Supporting Information document is a positive addition, it will be important to ensure that:

- Guidance is clear, simple, and easy to follow
- Support is readily available for those who need help completing the form
- A degree of flexibility is applied where applicants cannot provide all documentation immediately

Overall, the application form is thorough and structured, but consideration should be given to ensuring it remains accessible and proportionate, so that it does not unintentionally exclude applicants who may have genuine housing need but face practical barriers in completing the process.”

“7. Draft Application Form (P. 30) – Heritage groupings – What do KCC mean by ‘other’ groups? Why are non-ethnic groups not included here when the planning policy states the definition of who is deemed to be Gypsy or Traveller? This needs to be altered to include non-ethnic groups.

8. Children’s Details – Should include a section for elected home educated children too.

9. Appendix 3 Draft Supporting Information - Local Connection – What counts as a local connection for people who are from a travelling community? Who may not be able to prove this due to lack of provision, living just over the county border etc? In previous generations the family may have all been local and be buried in Kent graveyards, but current generations not been able to find a place to live in the county.

9.a. Proof of address – Why is this being asked of travelling communities? How is this relevant? People may not be able to provide a proof of address but should not be discriminated against this due to lack of provision from local authority.”

7. Feedback on the equality analysis

To help make sure we are following the Equality Act 2010, we carried out an Equality Impact Assessment (EqIA) on the draft Policy. This looked at how the proposed changes in the Policy might affect people with protected characteristics, such as age, disability, gender identify/transgender, pregnancy and maternity, marriage and civil partnerships, race, religion or belief, sex and sexual orientation. We also consider the impact on people with caring responsibilities. The EqIA was available on the consultation webpage or on request.

Consultees were asked to provide their views on the equality analysis, including suggestions for anything else that should be considered relating to equality and



diversity. The two responses received can be found below in the consultee's own words:

“Only that this is not equality as no other community gets such assistance. This is for cultural reasons and 'due preference' but it is not equality of treatment. Further, it is an odd conflict of providing fixed locations for a culture and heritage of mobility. In simple terms, when is a traveller not a traveller and that is when they cease to be nomadic.”

“The Equality Impact Assessment is a positive and important part of the process, and it is good to see consideration given to protected characteristics under the Equality Act 2010.

However, there may be a risk of indirect impacts arising from how the Policy operates in practice. In particular, the level of documentation, verification, and administrative requirements may be more challenging for some groups, including those with disabilities, lower literacy levels, or more complex living arrangements.

While support is referenced, it will be important to ensure this is accessible and sufficient in practice. There should also be consideration of whether the system may unintentionally favour those who are better able to navigate it, rather than those with the greatest need.

I would suggest ongoing monitoring of how different groups are able to access and progress through the system, and a degree of flexibility where appropriate to ensure fair outcomes.

Overall, the EqIA is a positive step, but further consideration of practical impacts would strengthen it.”



8. GRT Resident Service response to the consultation

The table below sets out KCC’s response to key themes and comments raised in consultation.

Comment / question raised	KCC response
<p>Concerns were raised about applicants’ ability to provide documentation.</p>	<p>The Policy will be updated to clearly allow flexibility where standard evidence cannot be provided. KCC is committed to making this Policy as inclusive as possible, and alternative evidence may be accepted based on individual circumstances, as long as it provides the same level of proof.</p>
<p>Consultees question whether fairness and transparency will be achieved <i>in practice</i> without clearer safeguards, consistency mechanisms, and transparency of scoring / decision review, and also whether professional judgement can be applied alongside documentary evidence in certain cases.</p>	<p>We will continue with the strengthened verification arrangements, alongside enhanced procedural safeguards - including transparent and consistent guidance, and the right to respond - to maintain confidence in decision-making (see section 10 of the Policy). Once approved and implemented, the Policy will be underpinned by comprehensive training and the designation of a dedicated officer within the team to ensure consistent application of the Policy and related decisions.</p>
<p>It was asked if KCC carries out the same police checks on people applying for bricks and mortar social housing.</p>	<p>KCC does not provide bricks and mortar housing. This requirement is set out in the current/existing Pitch Allocation Policy and there are no proposal to change it.</p>
<p>Suggestions that the criteria should be reviewed and considered whether some criteria may unintentionally disadvantage particular applicants.</p>	<p>The criteria set out in the Policy are a strengthened version of those used in the previous policy and are broadly aligned with criteria commonly applied within housing. The criteria have not previously been subject to challenge. Further review will take place once the new Policy has been implemented and sufficient evidence is available, either as part of continuous</p>



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Comment / question raised	KCC response
	improvement activity or in response to complaints and feedback received from applicants.
One consultee asked if anyone who has been on a unauthorised encampment regardless of whether there was alleged anti-social behaviour will be excluded from applying for a pitch.	No, the clause specifies anyone who sets up an unauthorised encampment and who behaved anti-socially whilst doing so or forced the council to incur legal cost will be excluded from applying for a pitch.
Concern about excluding applicants based on being under investigation or use of intelligence / markers that may not equate to proven wrongdoing.	The Policy has been updated to make clear that decisions will be based on the full range of available information, not just one individual piece of evidence (section 16 of the Policy).
Consultees suggested that there should be greater transparency around how points are applied, reviewed, and, where necessary, challenged, and that applicants should be able to clearly understand their position on the waiting list and how decisions are made.	<p>Where applicants request it, KCC will provide confirmation of their awarded points. If the applicant is able to provide adequate proof that supports the award of more points than this will be considered.</p> <p>Reasonable attempts to contact applicants will be made before any decision to remove them from the waiting list.</p> <p>The Policy does include an Appeals and Complaints section – section 24.</p>
Consultee suggested monitoring by KCC to determine whether applicants are able to successfully complete the process without undue difficulty.	As part of the GRT Resident Service’s ongoing commitment to improvement, any feedback suggesting that the application process is difficult will be considered and reviewed to identify opportunities for further improvement.
Suggestions that the Policy could be strengthened by expanding access to in-person support beyond a single location, and also that the new process may become overly administrative and act as a barrier.	Due to limited resources, the GRT Resident Service is unable to offer more than one face-to-face support session. Telephone support and signposting to other services remain available to help applicants with their application. This support is provided to balance accessibility with the administrative



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Comment / question raised	KCC response
	processes required to ensure fair and consistent plot allocation.
No points are awarded for local connection in new Policy / points system.	These points have been removed as the information required is difficult to evidence and verify in a consistent and proportionate way.
Consultee provided feedback on reference and verification checks, along with suggestions for expanded checks.	While the Policy names certain partner organisations, it makes clear that any checks undertaken will be necessary and proportionate, and may vary depending on the information provided by the applicant. This means that additional or alternative checks may be carried out where the information supplied warrants it, provided this is justified, proportionate, and lawful under UK GDPR data-sharing /protection requirements.
Feedback provided about how debt and housing need will be balanced.	This will be determined on a case by case basis depending on each individual circumstance.
Feedback highlights the removal of the 'interview' and the risk that it removes the opportunity for an applicant to explain their circumstances in more detail.	Engagement with applicants will always be discretionary and the GRT Resident Service publishes contact details for applicants to contact us where they wish to.
It was asked whether people are vetted for suitability before moving into social housing, whether existing residents have any say in who their neighbours are, and how is this applied in practice.	The reference to promoting a “balanced community” is not intended to endorse segregation or the exclusion of applicants based on ethnicity, religion, cultural identity, or family background. Rather, it reflects a practical site management consideration, similar to those applied across wider social housing, where landlords take into account safeguarding, welfare needs, household composition, and the sustainability of communities — while



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Comment / question raised	KCC response
	<p>remaining fully compliant with equality legislation.</p> <p>It would therefore not be appropriate to determine that an applicant should or should not be offered a pitch solely because:</p> <ul style="list-style-type: none"> • A site is predominantly occupied by one GRT group, or • Existing residents express a preference for neighbours from a particular background. <p>However, KCC may consider individual, evidence-based site management or welfare factors where relevant, for example:</p> <ul style="list-style-type: none"> • Specific safeguarding risks • Serious, evidenced disputes that cannot be mitigated through proportionate management action • The needs of vulnerable households or children. <p>Any such considerations must be:</p> <ul style="list-style-type: none"> • Based on objective evidence, not assumptions or generalisations • Proportionate and necessary • Considered on a case by case basis • Clearly documented and capable of being explained to the applicant.
<p>A question was raised about whether new Travellers can apply on equal grounds for a pitch on any of KCC's sites, where they meet the government's planning policy definition.</p>	<p>Yes, new Travellers are able to apply for a pitch on equal grounds.</p>



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Comment / question raised	KCC response
A suggestion was made that KCC should include the Voting Authority Certificate on the list of approved ID.	This has been added to the list of approved IC in the Supporting Information document.
It was asked whether ' <i>Unauthorised encampment roadside or development without running water and/or toilet facilities. 20 Contact details of landowner or Local Authority. Issued Section 77 or Section 78 Notice.</i> ' in the Points Rating section should also be include Section 55 of the CPR.	This has been added to the new Policy.
In the 'Points Rating relating to children' section, a consultee asked if the points refer to each individual child and if there is a cap on how many children are allowed to be catered for on a pitch. They also asked if there should be a section relating to home educated children, not just those who attend school.	Points are awarded for each child in full time education with no cap on the number of children. Points are only awarded for children who attend school, as this can be reliably evidenced.
A consultee asked whether the waiting list will carry over if the new policy is approved, or whether it will start from scratch.	The current waiting list will continue.
One consultee queried what 'credit checks with KCC intelligence' means in the 'References and Verification Checks' section of the Policy and asked what KCC would be checking.	The Policy does not refer to 'credit checks with KCC intelligence'. Relevant checks are carried out using KCC's intelligence databases, which hold details of criminal enforcement actions taken by local authorities under the legislation they are responsible for.
It was asked why KCC are checking Trading Standards databases and if they make the same checks for people applying for general social housing.	Trading Standards can enforce some criminal legislation that is not always recorded be the police. We therefore check Trading Standards information to verify details provided in the application. KCC does not provide general social housing, so we cannot confirm what checks are carried out for those applications.



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Comment / question raised	KCC response
<p>One consultee suggested that ‘confirmation with schools’ should also include deregistered children so EMTAS or Traveller Education is included.</p>	<p>Points are only awarded for children who attend school, as this can be reliably evidenced.</p>
<p>With regards to police checks, one consultee asked for confirmation on what a warning marker or intelligence flag is and if this is something also carried out with other social housing applicants. They also queried the legality of a warning marker and keeping that information on a database and whether it should be shared outside of the police force.</p>	<p>Warning markers or intelligence flags are gathered from previous experiences with an applicant. These may need to be considered for the health and safety of KCC staff. In the public sector these can be shared if there are previous incidents / instances that could identify a health and safety risk. All personal data is processed in accordance with Data Protection Act. This is detailed in the GRT Resident Service privacy notice.</p> <p>KCC does not provide general social housing, so we cannot confirm what checks are carried out for those applications.</p>
<p>One consultee asked how a decision not to offer a pitch is decided if not based on the points rating who decides the criteria, and under what evidence.</p>	<p>The points system is the main way that applications are prioritised, but it is not the only factor considered. In some limited circumstances, KCC may decide not to offer a vacant pitch even where an applicant has a high points score. Decisions are made by looking at all the available information together, rather than relying on points alone. This may include factors relating to:</p> <ul style="list-style-type: none"> • Site safety and management • Safeguarding or welfare concerns • The needs of vulnerable residents (including children) • Serious and evidenced issues that could not be managed through normal site support or mediation. <p>These decisions are not routine and are only made where it is believed to be necessary and proportionate to do so. The decision is</p>



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Comment / question raised	KCC response
	<p>made by senior officers within the GRT Resident Service, and where appropriate, advice may also be taken from other relevant professionals (for example, safeguarding or legal teams).</p> <p>Any decision not to offer a pitch will be based on clear, relevant evidence; considered on a case-by-case basis, and will be recorded and be capable of being explained.</p>
<p>One consultee asked what KCC means by 'other' groups under heritage groupings in the draft Application Form and why non-ethnic groups are not included here when the planning policy states the definition of who is deemed to be Gypsy or Traveller. They suggested that this be altered to include non-ethnic groups.</p>	<p>When the policy refers to "other" groups, this was meant to reflect identities beyond the more commonly referenced ethnic groups, but we recognise that this wording is unclear and could cause confusion.</p> <p>We also acknowledge the feedback that non-ethnic Gypsies and Travellers must be explicitly included. Planning policy defines Gypsies and Travellers based on way of life and travel patterns, not solely on ethnic background, and the Pitch Allocation Policy must be consistent with that definition. The final Policy will be amended to reflect this.</p>
<p>It was suggested that in the Application Form 'Children's Details' should include a section for elected home educated children too.</p>	<p>Points are only awarded for children who attend school, as this can be reliably evidenced.</p>
<p>One consultee asked, in relation to the draft Supporting Information under 'Local Connection' how a local connection would be defined for people from a travelling community. They noted that some individuals may be unable to provide evidence due to a lack of provision, living just over the county border etc. The consultee gave the example of families with longstanding historic connections to Kent,</p>	<p>It can be very hard for applicants to provide proof / evidence of a longstanding historic connection, but where this proof is provided KCC will consider it alongside the other information provided in the application.</p>



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Comment / question raised	KCC response
such as previous generations living locally and being buried in Kent cemeteries, but where current generations have been unable to secure accommodation within the county.	
It was queried why proof of address is this being requested from travelling communities, as some people may not be able to provide it. The consultee said applicants should not be discriminated because of this, particularly where a lack of local authority provision makes it difficult to evidence an address.	For a number of reasons, not all Gypsies and Travellers travel so this will be applied flexibly to take into account, where standard evidence cannot be provided. KCC is committed to making this Policy as inclusive as possible, and alternative evidence may be accepted based on individual circumstances, as long as it provides the same level of proof.

9. Next steps

All of the responses to this consultation have been considered by KCC and used to help finalise the Pitch Allocation Policy and supporting documents.

This report, the updated post-consultation EqIA and final Policy documents are expected to be presented to the Growth, Environment and Transport Cabinet Committee on 5 May 2026 before a decision is taken by the Cabinet Member for Community and Regulatory Services.

The consultation report and details of the decision will be published on the consultation webpage. The report can be made available in paper copy or alternative formats on request.



10. Appendix 1. Word version of questionnaire

Pitch Allocation Policy Questionnaire

We are proposing changes to our policy for how pitches are allocated on Kent County Council (KCC) owned and managed Gypsy and Traveller sites.

The Pitch Allocation Policy sets out how we allocate pitches when they become available and how we decide who is most in need. It is essential to the good management of our sites and helps make sure they provide a safe environment for Gypsy and Traveller communities.

This Policy only impacts future people applying to live on KCC owned sites. The changes being proposed would not impact current site residents unless they are applying to transfer between KCC sites or are a young person who currently lives on one of our sites with a parent(s) or guardian and wishes to apply for their own plot when they reach 18 years old.

These proposals relate only to the seven gypsy and traveller sites operated directly by KCC. They do not apply to the six sites run by the District and Borough Councils in Kent.

The main changes being proposed are:

- Updates to make the Policy clearer and more like the 'bricks and mortar' housing allocation policies operated by District and Borough Councils in Kent.
- How we handle applications, what documents applicants must provide, and how they are placed on the waiting list.
- Updated application form which asks the right questions to support the revised Policy.

More information on the changes being proposed is available in the Consultation Document. We have also made two videos explaining the consultation process and proposals, which are available, alongside all of the consultation material.

We recommend that you read the Consultation Document before completing this questionnaire. All of the consultation material is available from our website www.kent.gov.uk/pitchallocationpolicy or in paper copy on request.

If you have any questions, need any help to take part or require paper copies, please email gypsy.traveller@kent.gov.uk or call 03000 421 567 (Monday to Friday, 9am to 5pm).



Have your say

We want to hear your views on the proposed changes to our Pitch Allocation Policy and have provided this questionnaire for you to give your feedback. The questionnaire is split into five sections:

Section 1 – About you	Page 3
Section 2 – Your feedback on our draft Policy	Page 6
Section 3 – Application form	Page 15
Section 4 – Equality analysis	Page 16
Section 5 – Equality monitoring	Page 17

You can answer all or as many of the questions as you like. If you would rather not provide feedback on a section or question, just move on to the next one.

Please do not include any personal information that could identify you or anyone else in any of your answers.

This questionnaire can be completed online at www.kent.gov.uk/pitchallocationpolicy.

If you can't take part online, please fill in this paper form and return by:

- Email : gypsy.traveller@kent.gov.uk
- Post: GRT Resident Service, Kent County Council, County Hall, Maidstone, Kent ME14 1XQ
- To a member of the GRT Resident Service team (if you are currently a KCC site resident).

Please ensure your response reaches us by midnight on Monday 30 March 2026.

Privacy: Kent County Council (KCC) collects and processes personal information in order to provide a range of public services. KCC respects the privacy of individuals and endeavours to ensure personal information is collected fairly, lawfully, and in compliance with the United Kingdom General Data Protection Regulation and Data Protection Act 2018. Read the full Privacy Policy at the end of this document.

Alternative formats: If you require any of the consultation material in an alternative format or language, please email: alternativeformats@kent.gov.uk or call: 03000 42 15 53 (text relay service number: 18001 03000 42 15 53). This number goes to an answering machine, which is monitored during office hours.



Section 1 – About you

Q1. How are you taking part in this consultation?

Please select the option from the list below that most closely represents how you will be responding to this consultation. Please select **one** option.

<input type="checkbox"/>	As a resident of a Kent County Council (KCC) owned Gypsy and Traveller site
<input type="checkbox"/>	On behalf of a friend or family member living on a KCC owned Gypsy and Traveller site - please answer all the questions using their details and not your own
<input type="checkbox"/>	As a resident on another council owned site in Kent (not KCC)
<input type="checkbox"/>	As a Gypsy or Traveller living on a private site or in bricks and mortar
<input type="checkbox"/>	As a member of the public not living on a Gypsy and Traveller site
<input type="checkbox"/>	As a representative of a local community group or residents' association
<input type="checkbox"/>	On behalf of a Parish / Town / Borough / District Council in an official capacity
<input type="checkbox"/>	As a Parish / Town / Borough / District / County Councillor
<input type="checkbox"/>	On behalf of a charity, voluntary or community sector organisation (VCS)
<input type="checkbox"/>	Something else, please tell us:

Q1a. If you are responding on behalf of an organisation, please tell us the name of your organisation. Please write in below.



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Q1b. If you are responding as a resident or on behalf of a resident of a KCC owned site, please tell us which site you/they live on:

<input type="checkbox"/>	Aylesham Caravan Park
<input type="checkbox"/>	Barnfield Park
<input type="checkbox"/>	Coldharbour Caravan Site
<input type="checkbox"/>	Greenbridge Park
<input type="checkbox"/>	Polhill Caravan Site
<input type="checkbox"/>	Three Lakes Park
<input type="checkbox"/>	Windmill Lane Caravan Park

Q1c. If you are responding as a resident on a District or Borough Council owned site in Kent (not KCC), please tell us which site you live on:

Q2. Please tell us the first five characters of your postcode:

Please do not reveal your whole postcode. If you are responding on behalf of a friend or relative, provide their postcode. If you are responding on behalf of an organisation, use your organisation's postcode. We use this to help us to analyse our data. It will not be used to identify who you are.



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Q3. How did you find out about this consultation? Please select **all** that apply.

- | | |
|--------------------------|--|
| <input type="checkbox"/> | An email from Kent County Council (KCC) |
| <input type="checkbox"/> | Direct mail to my home |
| <input type="checkbox"/> | From a friend or relative |
| <input type="checkbox"/> | From a GRT Resident Service team |
| <input type="checkbox"/> | From my Parish / Town / Borough / District Council |
| <input type="checkbox"/> | Kent.gov.uk website |
| <input type="checkbox"/> | Newspaper |
| <input type="checkbox"/> | Poster |
| <input type="checkbox"/> | Social media (e.g. Facebook, X, Nextdoor) |
| <input type="checkbox"/> | Something else, please tell us: |



Section 2 – Your feedback on our draft Policy

You can read the new proposed draft of the Pitch Allocation Policy in Appendix 1 of the Consultation Document.

Q4. Is the new draft of the Pitch Allocation Policy easy to understand?

Please select **one** option.

<input type="checkbox"/>	Yes
<input type="checkbox"/>	Partly
<input type="checkbox"/>	No
<input type="checkbox"/>	I don't know

Q4a. If you have any suggestions on how we can make the Policy easier to understand, please tell us in the box below. If your suggestion relates to a specific section/page, please provide details in your answer.



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Q5. Does the draft Policy adequately consider the Gypsy, Roma and Traveller (GRT) community and its culture? Please select one option.

<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

Yes

Partly

No

I don't know

Q5a. If you have any suggestions on how we can make sure the Policy adequately considers the GRT community and its culture, please tell us in the box below. If your suggestion relates to a specific section/page, please provide details in your answer.



Aims of the Policy

The draft Policy sets out the following aims:

- Make best use of permanent pitches.
- Ensure fair and transparent allocation based on priority need.
- Provide pitches for eligible Gypsies and Travellers.
- Recognise the diversity within GRT communities.

Q6. Does the draft Policy meet these aims? Please select **one** option.

<input type="checkbox"/>	Yes
<input type="checkbox"/>	Partly
<input type="checkbox"/>	No
<input type="checkbox"/>	I don't know

Q6a. If you have any comments or suggestions on the aims, please tell us in the **box below**. If your comment relates to a specific aim, please make it clear in your answer.



Key changes and sections

We are now going to ask you some questions about the key proposals and sections in the draft Policy. From page 4 of the Consultation Document there is a table which provides a summary the proposed changes.

There will be an opportunity later to provide feedback on any of the other proposed changes and to tell us anything else you would like to about the draft Policy.

Exclusions for applying for a pitch

The exclusions for who cannot apply for a pitch are set out in the draft Policy from page 14 of the Consultation Document. In the current Policy under 'Unacceptable behaviour' anyone with a conviction for a violent or other serious offences, and/or weapons cannot apply for a pitch. In the new Policy this is extended to include anyone with a current or live police investigation as well. This means that if an applicant is being investigated by the police they will not have their application considered at this time.

Q7. Do you agree with the exclusions for applying for a pitch set out in the draft Policy? Please select **one** option.

<input type="checkbox"/>	Yes
<input type="checkbox"/>	Partly
<input type="checkbox"/>	No
<input type="checkbox"/>	I don't know

Q7a. If you have any comments or suggestions on the exclusions for applying for a pitch, please tell us in the box below. If your comment relates to a specific exclusion, please make that clear in your answer.



Waiting list

The draft Policy (from page 16 of the Consultation Document) explains how the waiting list will now work. Application forms would be accepted at any time, and once received, reviews, due diligence checks and pointing would take place. Following this, if the application is accepted, it would be added to the waiting list. Once on the waiting list, when a pitch becomes available, all of the applicants on the waiting list would be contacted to confirm their details and interest. The applicant with the highest number of points, would be offered the pitch.

It will be the responsibility of the person applying for a pitch to make sure that they keep their contact details up to date. This is so we can contact them when a pitch becomes available.

Q8. If you have any comments or suggestions on the waiting list, please tell us in the box below.



Application process

This section of the Policy (pages 16 to 18 in the Consultation Document) explains the process for applying for a pitch in more detail. It also introduces a monthly 'drop-in session' in Maidstone, providing assistance with completing an application.

Q9. Does the draft Policy make the process for pitch applications clear? Please select **one** option.

<input type="checkbox"/>	Yes
<input type="checkbox"/>	Partly
<input type="checkbox"/>	No
<input type="checkbox"/>	I don't know

Q9a. If you have any suggestions on how we can make the applications process clearer or would like to provide comments on the application process, please tell us in the box below. If your suggestion relates to a specific section/page, please provide details in your answer.



Pointing and evidence requirements

Once completed applications and supporting information have been received, they will be assessed and reviewed for pointing. Pointing is used to identify which applicants are considered the most in need. The draft Policy sets out the six areas that are considered for pointing, and the evidence requirements for each. They can be found from page 18 to 21 of the Consultation Document.

Q10. If you have any comments or suggestions on the pointing and evidence requirements, please tell us in the box below. If your comment relates to a specific criteria, please make that clear in your answer.

References and verification checks

This section of the draft Policy explains the references and verification checks that will be completed on each application for anyone living on the pitch over the age of 18. This can be found from page 22 of the Consultation Document.

Q11. If you have any comments or suggestions on the references and verification checks, please tell us in the box below. If your comment relates to a specific check, reference or verification, please make that clear in your answer.



Feedback on other changes or anything else you would like to tell us

The new draft Policy also proposes to make the following changes:

- Legislative framework - new sentence added to state that the policy is closely aligned with District and Borough Council housing allocation schemes.
- Equality and diversity – amended to explain our commitment to the Equality Act 2010 in simpler and clearer terms.
- Debtors – applicants won't be considered for a pitch if they previously owed money to KCC and the debt remains unpaid, unless their housing need outweighs the debt.
- Interview – removes the need for the applicants with the highest scores to meet with KCC's GRT Resident Service in-person to discuss their application in more detail.
- Addition to the waiting list – new section clarifying when an application is added to the waiting list.
- When a pitch becomes available for allocation – new section explaining the new process for allocating a pitch.
- Visit to site/pitch – only the top scorer is invited to visit the pitch.
- Appeals and complaints – amended to include more detail.
- Appendix 1 points allocation system - replaced in the new Policy by the 'Points Rating Criteria' table in section 10. 'Pointing and evidence requirements.'

A table summarising the changes is available from page 4 of the Consultation Document.



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Q12. Do you have any comments on the rest of the changes being proposed or is there anything else you would like to tell us about the draft Pitch Allocation Policy for KCC owned sites? If your comment relates to a specific change/proposal, please make that clear in your answer. Please do not include any personal information that could identify you or anyone else in your answer.



Section 3 – Application form

You can find the new draft application form in Appendix 2 of the Consultation Document. The form collects all the details needed to manage pitch allocations in line with the new draft Policy. To make sure we get the right information from applicants, we have reviewed the response options in section 2 'Current Accommodation Arrangements' ('Are there problems with your existing accommodation?') and now ask:

- for extra information about family members who would also be living on the pitch about health or medical issues affecting current or future living arrangements
- if the applicant is a Carer.

To make things easier, there is now a Supporting Information document to help applicants to complete the application form. You can see a draft of this in Appendix 3 of the Consultation Document.

Q13. Please use the box below to provide any feedback on the proposed application form. Please do not include any personal information that could identify you or anyone else in your answer.



Section 4 – Equality analysis

To help make sure we are meeting our responsibilities under the Equality Act 2010 we have prepared an Equality Impact Assessment (EqIA) for the proposed draft Policy.

An EqIA is a tool to assess the impact any proposals would have on the protected characteristics: age, disability, gender identity/re-assignment, pregnancy and maternity, marriage and civil partnerships, race, religion or belief, sex and sexual orientation. We also include carer's responsibilities. The EqIA is available online at www.kent.gov.uk/pitchallocationpolicy or on request.

Q14. We welcome your views on our equality analysis and if you think there is anything we should consider relating to equality and diversity, please add any comments below.

Please do not include any personal information that could identify you or anyone else in your answer.



Section 5 – Equality monitoring

We are asking these optional questions to help us meet our obligations under the Public Sector Equality Duty. This information really helps us to understand how people with different protected characteristics could be affected by our proposals. **If you would rather not answer any of these questions, you don't have to.**

It is not necessary to answer these questions if you are responding on behalf of an organisation.

If you are responding **on behalf of someone else**, please answer using their details.

Q15. Which of these age groups applies to you? Please select one option.

<input type="checkbox"/>	Under 16	<input type="checkbox"/>	16-25	<input type="checkbox"/>	26-35	<input type="checkbox"/>	36-45	<input type="checkbox"/>	46-55
<input type="checkbox"/>	56-65	<input type="checkbox"/>	66-75	<input type="checkbox"/>	76-85	<input type="checkbox"/>	86+ over	<input type="checkbox"/>	I prefer not to say

Q16. What is your ethnic group? Please select one option.

White

<input type="checkbox"/>	English, Scottish, Welsh, Northern Irish or British
<input type="checkbox"/>	Irish
<input type="checkbox"/>	Gypsy or Irish Traveller
<input type="checkbox"/>	Roma
<input type="checkbox"/>	Any other White background, please tell us:

Please see over the page for more ethnic groups.



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Mixed or Multiple

White and Black Caribbean

White and Black African

White and Asian

Any other Mixed or Multiple background, please tell us:

Asian or Asian British

Indian

Pakistani

Bangladeshi

Chinese

Any other Asian or Asian British background, please tell us:

Black, Black British, Caribbean or African

Caribbean

African background, write in below

Any other Black, Black British, or Caribbean background, please write in below:

Another ethnic group

Arab

Roma

Any other ethnic group, please tell us:



Q17. Do you have a disability, health condition, physical or mental impairment that has a substantial and long-term negative effect on your ability to do normal daily activities? Please select **one** option.

- Yes
- No
- I prefer not to say

Q17a. If you answered 'Yes' to Q17, please tell us if any of the following disabilities or health conditions apply to you.

You may have more than one, so please select **all** that apply. If none of these applies to you, please select 'A different disability or health condition' and give brief details.

- Physical
- Sensory (hearing, sight or both)
- Longstanding illness or health condition, such as cancer, HIV/AIDS, heart disease, diabetes or epilepsy
- Mental health condition
- Learning disability
- Neurodivergent, such as ADHD, autism, dyslexia and dyspraxia
- I prefer not to say
- A different disability or health condition

If you have selected 'A different disability or health condition', please tell us:



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A Carer is someone who gives unpaid care or help to anyone because they have a long-term physical or mental health condition or illness, or problem related to old age. Both children and adults can be Carers.

Q18. Are you a Carer? Please select **one** option.

- Yes
- No
- I prefer not to say

Q19. What is your religion or belief? Please select **one** option.

- No religion or belief
- Atheist
- Christian
- Buddhist
- Hindu
- Jewish
- Muslim
- Sikh
- A different religion or belief, please tell us:
- I prefer not to say



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Q20. What is your sex? A question about gender identity will follow. Please select **one** option.

- Female
- Male
- I prefer not to say

Q21. Is the gender you identify with the same as your sex registered at birth?
Please select **one** option.

- Yes
- No, please tell us your gender identity:
- I prefer not to say

Q22. Which of the following best describes your sexual orientation? Please select **one** option.

- Heterosexual/Straight
- Gay or Lesbian
- Bisexual
- I prefer to define my own sexuality, please tell us:
- I prefer not to say

Thank you for taking the time to complete this questionnaire. Your feedback is important to us. All feedback received will be reviewed and considered in the development of our proposals.

We will report back on the feedback we receive, but details of individual responses will remain anonymous, and we will keep your personal details confidential.

Closing date for responses: 30 March 2026.