

From: Simon Jones, Corporate Director Growth, Environment & Transport

To: Georgia Foster, Cabinet Member for Community and Regulatory Services

Subject: Adoption of Gypsy and Traveller Site Pitch Allocation Policy 2026

Decision no: 26/00017

Key Decision: It affects more than 2 Electoral Divisions

Classification: Unrestricted

Past Pathway of Report: Growth, Environment and Transport Cabinet Committee –
5 May 2026

Future Pathway of report: Cabinet Member Decision

Electoral Division: All divisions

Is the decision eligible for call-in? Yes

Summary: This report sets out the case for adopting the Gypsy and Traveller Site Pitch Allocation Policy 2026, which updates and replaces the current policy adopted in 2023. The revised policy has been developed to improve clarity, fairness and consistency in how pitches are allocated across the seven Gypsy and Traveller sites owned and managed by Kent County Council.

The policy has been subject to public consultation, Equality Impact Assessment and Data Protection Impact Assessment. No additional financial costs are anticipated, as the changes will be delivered within existing staffing and budgetary resources.

Recommendation(s):

The Cabinet Member for Community and Regulatory Services is asked to agree to the proposed decision as detailed in the attached Proposed Record of Decision document (Appendix A).

1. Introduction

Kent County Council (KCC) is reviewing and updating its Gypsy and Traveller Pitch Allocation Policy to ensure fair, transparent, and consistent decision-making around the allocation of pitches on the seven sites managed directly by KCC. This review forms part of a wider effort to modernise and improve the Allocation Policy that was revised in 2023, ensuring greater alignment with District and Borough Council housing practices and strengthening site management approaches.

2. Key Considerations

- 2.1 The current pitch allocations policy was last updated in 2023, and feedback from staff, applicants, and partner organisations has shown that some parts of the process are unclear, difficult to follow, or no longer aligned with modern housing allocation approaches used by District and Borough councils.
- 2.2 The updated version explains the process more clearly, strengthens the checks and evidence needed, and brings the system in line with how housing allocations work elsewhere in Kent.
- 2.3 It also helps ensure the council meets legal and data-protection requirements, reduces risks, and makes the process easier and more accessible for applicants, including those who may need extra support.

3. Background

- 3.1 Kent County Council (KCC) owns and manages seven Gypsy and Traveller sites across the county. Although KCC no longer has a statutory duty to provide Gypsy and Traveller sites, it continues to do so because of historic responsibilities, with council decisions around site provision dating back to the 1960s.
- 3.2 In Kent, the district and borough councils act as the Housing Authorities. This means they hold legal responsibility for housing duties, including homelessness assessments, housing allocations, and broader strategic housing functions. While KCC provides and manages its seven sites, the districts are responsible for meeting local housing need, delivering housing strategies, and fulfilling statutory housing obligations.
- 3.3. As the long-term site owner and landlord, KCC is responsible for maintaining the sites and ensuring that all owner-led maintenance and council services are provided. Public Gypsy and Traveller pitches function similarly to social rented housing and are intended for those unable to meet their accommodation needs through private provision.
- 3.4 On each pitch, KCC provides:
 - Utility/ablution block
 - Supply of utilities
 - Hardstanding for homes
 - Defined boundaries.Separately, KCC has responsibility for the rest of the site not included in each individual pitch, including surface and foul drainage, fencing and access routes.
- 3.5 The Gypsy Roma Traveller (GRT) Resident Service's core role is to provide safe, well-maintained accommodation for GRT communities and act as a landlord for residents, ensuring sites are properly managed, pitches are allocated fairly, and communities are supported. The service carries out regular site visits, deals with unauthorised encampments on KCC land, and works with partners to help residents access support and services.

- 3.6 It is published in the Kent 'Gypsy, Roma and Traveller Populations' Joint Strategic Needs Assessment completed by KCC Public Health¹ that 'life expectancy is 10 to 12 years less than that of the non-Traveller population (Traveller Movement 2012), and that a 'report published by the Equality and Human Rights Commission (2009) (EHRC) suggested that amongst Gypsies and Travellers with access to secure council or private owned sites, and who had access to adequate medical care, life expectancy may be closer to that of the general population²'.
- 3.7 In 2023, the Service was successful in securing a £4.05m capital grant (40% of the national pot) from the Ministry of Housing, Communities and Local Government Traveller Site Fund to refurbish and significantly improve the standard, quality and condition of all KCC assets on the sites. This project is now complete and as a result, the cost of reactive maintenance repairs has been reduced by more than 80% (approximately £85,000), which is a positive for the KCC Corporate Landlord budget which covers all statutory compliance tasks and the majority of reactive repairs.

4. Options considered and dismissed, and associated risk

- 4.1 The amendments to the Policy are Service led and have been identified as 'continuous improvement' based on feedback from staff applying the policy and a formal complaint from an applicant.
- 4.2 Other options could have been to do nothing, or to have kept the existing policy but offered clearer guidance or extra support to help applicants understand and use it. However, this would not have provided improvements, and it would not have tackled the underlying issues of fairness, clarity, and consistency.

5. Summary of Changes in 2026 Policy

- 5.1 The updated Policy clarifies its focus on making best use of permanent pitches, ensuring fair and transparent allocation based on priority need, providing pitches for eligible Gypsies and Travellers, and recognising the diversity within GRT communities.
- 5.2 The legislative framework has also been expanded, with an explicit reference confirming the Policy's alignment with Housing Authority schemes. In the section on equality and diversity, the Policy now explains the Council's commitments under the Equality Act 2010 in clearer and more readily understandable terms.
- 5.3 Changes have been made to the exclusions for applying for a pitch. The current Policy prevents applications from individuals with convictions for violent or serious offences or weapons-related crimes. The revised Policy extends this to include anyone subject to a current or live police investigation, meaning their application will not be considered until the investigation concludes. The sections previously titled 'Statutory exclusions', 'Anti-social behaviour' and 'Other

¹ <https://www.kpho.org.uk/joint-strategic-needs-assessment/health-intelligence/population-groups/ethnicity#tab1>

² [Research report 12: Inequalities experienced by Gypsy and Traveller communities | Equality and Human Rights Commission \(equalityhumanrights.com\)](#)

accommodations' have been incorporated into a streamlined opening paragraph in section 7.

- 5.4 A new section on the waiting list explains how applications can now be submitted at any time as opposed to just when plots are available. It outlines the review and checking process and confirms that successful applicants will then be added to the waiting list. It emphasises that applicants will be responsible for keeping their contact details up to date so they can be reached when a pitch becomes available, as the Policy also now explains the process that all applicants on the waiting list will be contacted to confirm their details and interest.
- 5.5 The application process section now provides clearer instructions on how to apply and introduces monthly drop-in sessions in Maidstone to help applicants complete their forms.
- 5.6 The constant with this policy is that pitches are allocated to the 'highest pointing' applicant. The pointing and evidence requirements section has been expanded to set out the six areas considered for pointing, alongside the evidence required for each. The previous scoring table in section 21 has been replaced by a new 'Points Rating Criteria' table within the pointing section. This incorporates several changes, including the removal of points for local connections as this cannot be reliably evidenced, the addition of 'no fixed address/sofa surfing' under existing accommodation, and the reassignment of certain circumstances—such as being given notice to quit through no fault of their own—to different scoring categories for greater clarity. The 'poor or absent facilities' criteria have been removed. Amendments have also been made to welfare, family and education-related considerations, adding clearer definitions and additional supporting circumstances. Under medical conditions, the Policy now distinguishes between two types of minor medical needs—those affected by current living conditions and those that are not—to ensure a more accurate assessment of need.
- 5.7 Several previous sections have been reorganised: content previously covered under sections 11, 12, 13 and the 'Debtors' section is now included within 'References and verification checks. Under this new structure, applicants who owe money to KCC will not be considered unless their housing need outweighs the outstanding debt, replacing the previous absolute exclusion unless debts were paid in full. This will fall into the 'exceptional circumstances' criteria.
- 5.8 The section on references and verification checks has been strengthened with more detail on police checks and the implications of any discrepancies between the information provided and the results of those checks.
- 5.9 The appeals and complaints section has been revised to include more detail on the processes available to applicants.

6. Consultation Activity and Outcome

- 6.1 A public consultation on the Policy was undertaken between 4 February and 30 March 2026, seeking views on the proposed changes. The consultation was delivered through KCC's online engagement platform, supported by options to

give feedback via a Word questionnaire, in-person, by phone, email or letter, with all materials signposting how to request hard copies or alternative formats.

- 6.2 Four drop-in events at local libraries allowed the public to speak directly with GRT Resident Service staff, ask questions and share their views. There were two attendees at these events, who submitted one response to the consultation.
- 6.3 The consultation received nine responses. Overall, respondents broadly supported the intention to introduce a clearer and more structured allocation process. Feedback highlighted the importance of ensuring the policy operates fairly in practice, remains accessible to applicants, applies evidence and verification requirements proportionately, and includes appropriate safeguards to support transparency and consistency in decision-making.
- 6.4 All consultation responses have been considered and have informed targeted refinements to the final policy, supporting documents and Equality Impact Assessment, which are presented alongside this report to support informed decision-making.
- 6.5 One respondent felt that having a points-based system was not suitable for GRT families and communities as it doesn't make provision for families to stay together on sites, when children reach the age of needing/wanting their own pitch. However, the respondent also recognised that pitches could not be held just for children if/when they might want a plot on the same site as their family, and that there would be significant issue with aligning the timing of this.

7. Financial Implications

- 7.1 There are no additional financial costs associated with the new policy because it has been designed to work fully within the service's existing resources both in terms of staff and budget. The updates focus on improving clarity and consistency of process by tweaking some processes and enhancing some areas to ensure it stays within the same cost resource. Any additional tasks created by the revised process can be absorbed by the current GRT Resident Service team, whose capacity and expertise are already well-aligned to deliver the changes.
- 7.2 The strengthened approach allows more thorough checks before entering into a Pitch Licence Agreement. This will help the Service to understand each resident's situation earlier and more accurately, giving greater confidence in identifying risks and putting the right interventions in place to prevent residents from falling into debt, and enabling the Service to take appropriate and proportionate action should debt start to accrue.
- 7.3 For context, the revenue budget for 25/26 within the service is set at an over-recovery level of -£8.1k on the assumption that the sites will be recharged costs with a small over-recovery to cover administration.

| Category | Amount |
|---|-------------------|
| Service Operating Costs | £447,523.00 |
| Site Operating Costs | £118,200.00 |
| Rental Income | -£490,223.00 |
| Water Repayments | -£37,000.00 |
| Miscellaneous (Repayments, Management fees) | -£46,600.00 |
| Total | -£8,100.00 |

7.4 On an annual basis, as per legislation (Mobile Homes Act 1983 (amended 2023)) the service has successfully implemented an increase to weekly pitch rents to cover operating costs. The annual review is implemented every 1st April, with the weekly rents increased by the CPI rate recorded in January.

8. Legal implications

8.1 A review of the Policy has been undertaken by an expert Barrister, and no challenges or issues have been identified.

9. Equalities implications

9.1 The reviewed policy directly affects Gypsy and Traveller communities, a recognised ethnic minority group. Due consideration has been given to key equality considerations including but not limited to:

- Ensuring equitable access to pitches for those with the greatest need, including vulnerable or homeless applicants.
- Preventing discriminatory practices by applying consistent and transparent criteria.
- Supporting young residents transitioning into adulthood with clear guidance on future applications.
- Providing consultation materials in alternative formats and languages to avoid exclusion.

9.2 The EqIA shows that the updated Pitch Allocation Policy has been carefully reviewed to ensure it is fair, accessible, and does not negatively impact protected groups. The assessment found no significant negative impacts for most groups, and highlighted several positive ones—such as clearer information, improved accessibility, and more support for applicants of different ages, abilities, and literacy levels.

9.3 Where potential challenges were identified (for example, applicants with lower literacy or disabled applicants needing support), the EqIA sets out practical mitigating actions, including offering help with applications and making the process easier to understand.

10. Data Protection Implications

10.1 The adoption of the Pitch Allocation Policy 2026 involves the processing of personal and special category data relating to applicants and household members, including identity, contact details, health information, education, financial circumstances and information obtained through verification and

safeguarding checks. This data is necessary to assess eligibility, housing need and suitability for a pitch in a fair and transparent manner.

10.2 A Data Protection Impact Assessment (DPIA) has been completed and no data protection risks have been identified that would prevent adoption of the policy.

11. Other corporate implications

11.1 Adoption of the Pitch Allocation Policy 2026 will have no impact on other Council services. The policy revisions focus on clarifying processes, strengthening evidence requirements, and aligning allocation practices with existing housing-related frameworks, but they do not introduce new responsibilities, procedural changes, or dependencies for any other service areas.

12. Governance

12.1 The Director of Growth and Communities will be delegated any further decisions that may be appropriate to deliver the Policy.

13. Conclusions

13.1 The Gypsy and Traveller Site Pitch Allocation Policy 2026 represent a proportionate and necessary update to ensure that Kent County Council continues to allocate its limited number of pitches fairly, transparently and in line with modern housing allocation principles.

13.2 By strengthening the policy framework, improving clarity for applicants, and reinforcing evidence-based decision-making, the revised policy provides greater confidence that pitches will be allocated to those with the greatest need, while also supporting effective site management and safeguarding community wellbeing. It enables earlier identification of risk, supports residents to sustain their tenancies, and helps to reduce avoidable issues such as debt or tenancy failure.

13.3 The proposed changes have been carefully developed, consulted upon and assessed for equality and data protection impacts, with no significant adverse effects identified. Adoption of the policy will support stronger, more resilient Gypsy and Traveller communities now and in the future, while ensuring the Council continues to meet its responsibilities as a landlord in a fair, lawful and transparent way.

Recommendation(s):

The Cabinet Member for Community and Regulatory Services is asked to agree to the proposed decision as detailed in the attached Proposed Record of Decision document (Appendix A).

14. Appendices

- A –Record of Decision
- B - Pitch Allocation Policy 2026
- C - Consultation Report
- D - Equality Impact Assessment

15. Contact details

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