

Maidstone Gypsy, Traveller and Travelling Showpeople Development Plan Document

Statement of Common Ground

Between:

Maidstone Borough Council and Swale Borough Council

Position at Regulation 18c Consultation (2025)

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1. Introduction

Status of the Statement of Common Ground

- 1.1 This is a Statement of Common Ground (SoCG) between Maidstone Borough Council and Swale Borough Council.
- 1.2 This version of the SoCG supports the draft Gypsy, Traveller and Travelling Showpeople Development Plan Document – Preferred Policies and Potential Sites (**Regulation 18c**) stage. It is expected that a further version of the SoCG will be produced prior to the submission of the Gypsy, Traveller and Travelling Showpeople Development Plan Document.

On behalf of Maidstone Borough Council

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Strategic matters	Gypsy, Traveller and Travelling Showpeople accommodation
Signature	
Date	15.05.2026

On behalf of Swale Borough Council:

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Purpose and structure

- 1.3 A Statement of Common Ground (SoCG) records key strategic cross-boundary matters of agreement or disagreement, or that are under discussion. The SoCG also includes the process for reaching agreements.
- 1.4 Maidstone Borough Council ('the Council') anticipates the need to agree a final SoCGs with the following strategic bodies:
- Ashford Borough Council;
 - Medway Council;
 - Swale Borough Council;
 - Tonbridge and Malling Borough Council;
 - Tunbridge Wells Borough Council; and potentially
 - Kent County Council;
- 1.5 This SoCG will set out the strategic context, strategic matters, governance arrangements and ongoing cooperation. It will be updated throughout the plan-making process.
- 1.6 Evidence of the ongoing, effective engagement and cooperation to date is recorded in the Appendices of this SoCG. It will be updated throughout the plan-making process.

Terminology

- 1.7 Strategic matters are presented as "Agreed", "Under discussion" or "Not agreed". These may be updated as discussions evolve.

Context

Spatial context

- 1.8 **Maidstone** is a Borough Council within the County of Kent. Maidstone is the Local Planning Authority, while Kent County Council has responsibility for the provision of services including transport and education. Maidstone is surrounded by the Kent District Councils of Ashford, Tonbridge & Malling, Tunbridge Wells, Swale, and Medway Council (a unitary authority working collaboratively with Kent County Council to provide services). In terms of neighbouring authorities, the following figure details those boroughs with which Maidstone shares a boundary:



Figure 1: Maidstone's neighbouring Local Planning Authorities

1.9 **Swale** is one of 12 local councils within the county of Kent. Swale borders the districts of Canterbury, Ashford and Maidstone, in addition to the Medway Unitary Authority. Swale is a coastal borough located immediately to the north east of Maidstone Borough, and the two boroughs share a 17km linear boundary which lies within the Kent Downs National Landscape in its entirety. Both boroughs contain a mix of urban and rural environs.

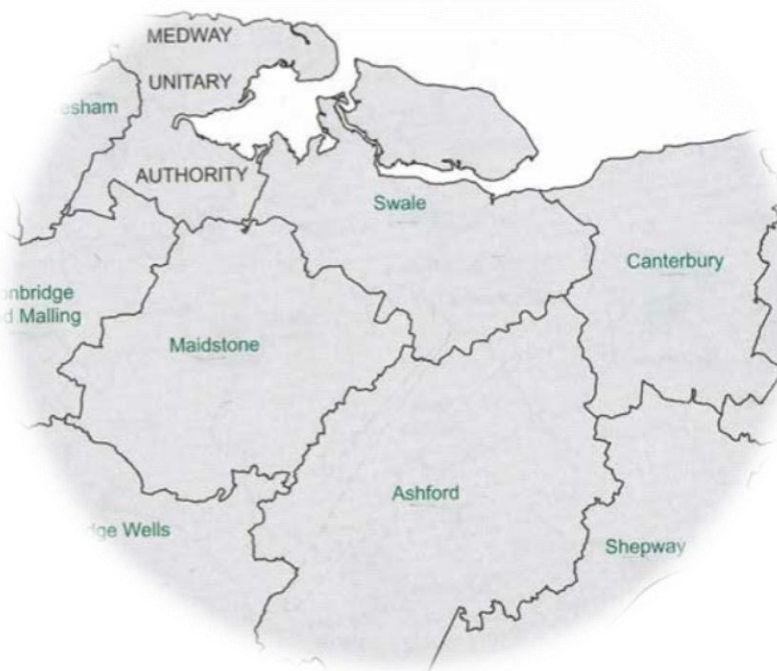


Figure 2: Swale's neighbouring Local Planning Authorities

Local Plan context

1.10 **Maidstone Borough Council** (MBC) adopted its Local Plan Review (LPR) in March 2024. It contains strategic and non-strategic policies, thematic and development policies, as well as site allocations. The LPR covers the period 2021 to 2038 and plans for the provision of 19,669 homes, 119,250sqm employment floorspace, 14,360sqm retail floors space, as well as setting out the associated infrastructure requirements in the Infrastructure Delivery Plan.

1.11 The LPR explains that the needs of Gypsies, Travellers and Travelling Showpeople are to be addressed through the preparation of a separate Development Plan Document (DPD). This is made clear in policy LPRSS1 – Maidstone Borough Spatial Strategy, criterion 9, as follows:

"9. The council will seek to ensure that the accommodation needs of the gypsy, traveller and travelling showpeople community over the plan period will be met in full. Further details will be set out in a Gypsy, Traveller and Travelling Showpeople DPD."

1.12 The LPR also contains the following directly relevant policies:

- LPRSP10(C) (Gypsy and Traveller site allocations) and LPRGT1(1) through LPRGT1(11)
- LPRHOU8 (Gypsy, Traveller, and Travelling Showpeople accommodation)

1.13 Alongside the preparation of this separate Gypsy, Traveller and Travelling Showpeople DPD, the Council is now in the early stages of beginning a new Local Plan, after the Cabinet decision was made in October 2025.

1.14 **Swale Borough Council** adopted its Local Plan, Bearing Fruits, in July 2017. It has plan period 2014 to 2031. It sets the spatial strategy and quantum of development over the plan period. With regard to the provision of Gypsy and Traveller pitches and Travelling Showpeople plots, the plan states that 85 pitches and no plots would be needed to 2031.

1.15 Preparation of a new Local Plan is underway. Most recently, an 'early stage' Regulation 18 public consultation was held between 12 January and 23 February 2026. This consultation asked for feedback from stakeholders and the community on a series of questions about the Local Plan's vision, objectives and Development Management policies. It did not include strategic policies or site allocations.

1.16 The Regulation 18 consultation plan included two development management policies relating to Gypsy and Traveller accommodation: H3 – Rural exception and community-led housing development, and H6 – Gypsy, Traveller and Travelling Showpeople Accommodation.

Gypsy, Traveller and Travelling Showpeople context

1.17 Gypsies and Travellers are a diverse group of communities which share some features but have their own histories and traditions. A key common feature is nomadism. Gypsies, Travellers and Travelling Showpeoples' history, heritage and traditions distinguish them from settled communities. Distinct again from these groups are travelling showpeople. They run fairs, circuses or shows, and their presence in Maidstone also goes back many years.

1.18 Gypsies and Travellers have a very long historic and cultural association with Maidstone Borough. There are approximately 576 traveller and travelling showpeople households in the borough, residing across circa 540 pitches and 6 plots. The current spatial distribution of sites shows the majority are located in the southern half of the borough and predominantly in rural, countryside locations, outside of settlement boundaries (see Figure 2).

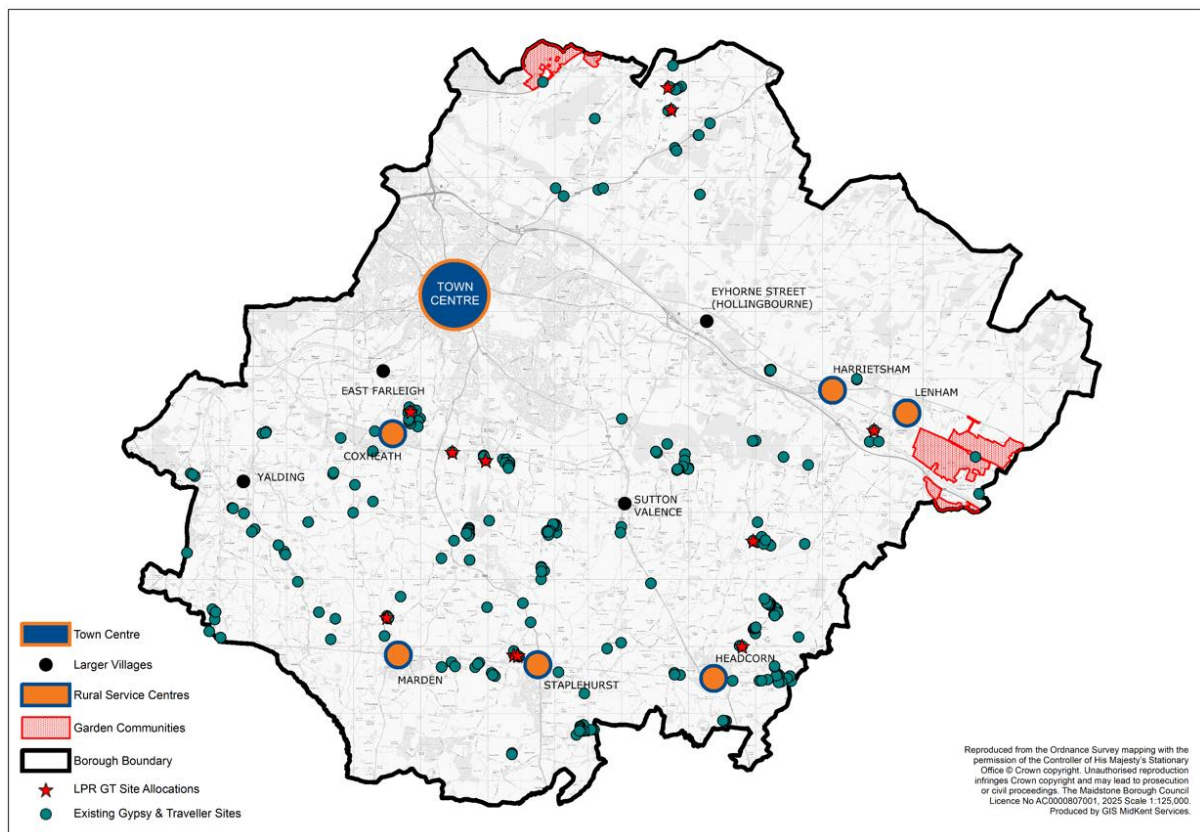


Figure 3: Spatial distribution of Maidstone's existing Gypsy, Traveller and Travelling Showpeople sites

2. Strategic Matters

Regulation 18c

Meeting Gypsy, Traveller and Travelling Showpeople Accommodation

What are the identified needs?

- 2.1 Maidstone Borough Council commissioned a [Gypsy and Traveller Accommodation Assessment](#) (GTAA) (2025) which identified the need for Gypsy, Traveller and Travelling Showpeople accommodation in Maidstone Borough over the period 2023 to 2040 as:

Permanent pitch requirements of Gypsy and Traveller households				
Years		PPTS definition households	Undetermined households	Total pitches from all households
0-5	2023-27	251	82	333
6-10	2028-32	56	14	70
11-15	2033-37	61	16	77
16-18	2038-40	39	10	49
Total		407	122	529
Permanent plot requirements of Travelling Showpeople households				
Years		PPTS definition households	Undetermined households	Total plots from all households
0-5	2023-27	2	2	4
6-10	2028-32	1	0	1
11-15	2033-37	1	1	2
16-18	2038-40	0	0	0
Total		4	3	7

- 2.2 The PPTS requires us to identify deliverable sites for years 1 to 5 of the plan (i.e. allocations); to identify developable sites or broad locations for years 6 to 10, and where possible 11 to 15.
- 2.3 A total of 251 deliverable pitches and 2 deliverable plots require allocation in the first five years for households meeting the planning definition. However, since the 2023 base date, permission has been granted for 75 permanent pitches, taking the **net need requirement to 176 pitches and 2 plots.**

- 2.4 Need occurring after year five results from assumed household formation rates. The GTAA recommends that the need arising from undetermined households is addressed through the development management process.

How will the need be met?

- 2.5 The Maidstone Gypsy, Traveller and Travelling Showpeople Development Plan Document – Preferred policies and potential sites (Regulation 18c) outlines that new pitches and plots to address the Borough’s need will be met as follows:

- 1) Through the allocation of sites, the identification of broad locations for growth and the granting of planning permissions, provision will be made for 529 pitches for Gypsies and Travellers and 7 plots for Travelling Showpeople over the plan period 2023 to 2040.

Meeting need in years 1 to 5 (site allocations)

- 2) In accordance with the PPTS, site allocations that contribute towards meeting the identified needs¹ for households who meet the PPTS Annex 1 definition (251 pitches and 2 plots) over the first 5 years of the plan, 2023 to 2027, are identified on the Policies Map and listed under strategic **policy TR4**. The policy sets out the indicative number of additional pitches or plots that could be accommodated on each site.
- 3) Any remaining unmet accommodation needs for Gypsy, Traveller and Travelling Showpeople households (including need for undetermined households²) over the first 5 years of the plan, 2023 to 2027, will be addressed primarily through the consideration of planning applications for additional pitches/plots within identified broad locations for growth – as per criterion 4 of this policy.

Meeting need in years 6 to 10 (Broad locations for growth)

- 4) In accordance with the PPTS, any existing authorised permanent sites or land adjoining existing authorised permanent sites in the borough where the land is in control of the household on the existing site are identified as broad locations for growth where the provision of additional pitches/plots to meet identified accommodation needs between 2028 and 2032 are supported.

Meeting need in years 11 to 15 (Broad locations for growth)

- 5) In accordance with the PPTS, any existing authorised permanent sites or land adjoining existing authorised permanent sites in the borough where the land is in control of the household on the existing site are identified as broad locations for growth where the provision of additional pitches/plots to meet identified accommodation needs from 2033 onwards are supported.

Unmet need (windfall sites)

¹ Maidstone Borough GTAA (2025)

² Households who were not available for interview and therefore who’s planning definition status – for the purposes of plan-making – could not be determined.

- 6) Any accommodation needs that cannot be met through site allocations or broad locations will be addressed through consideration of planning applications for pitches/plots on new sites (windfall sites) in accordance with national policy, **policy TR1**, **policy TR7**, and any other relevant Maidstone Development Plan policies.
- 7) Additional sites may be allocated as part of a future review of the plan, based on updated evidence of needs.

2.6 At this Regulation 18c stage, **potentially deliverable sites** that could contribute to meeting the need in the first 5 years come from three sources:

- 1) Existing Gypsy and Traveller sites in the borough;
- 2) Existing Local Plan Review 'GT1' site allocations; and
- 3) Potentially suitable sites submitted through the three 'call for sites' exercises.

DELIVERABLE pitch requirement:		
Pitch requirement (PPTS-households, first 5 years)	251	
Permissions granted 2023/24 – 2024/25	75	-
Net pitch requirement 2023/24 – 2027/28	176	=
Potential DELIVERABLE supply (at Reg 18c):		Up to:
Existing sites in the borough	114	
Existing LPR 'GT1' site allocations	22	
Call for sites potentially suitable sites	128	
TOTAL	264	=
Residual 'unmet' need in first 5 years	-154 to +89	=

2.7 These potential sources of deliverable supply are to be subject to more detailed assessment between Regulation 18c and Regulation 19. This is almost certain to alter potential site capacities and may even alter a site's overall suitability for allocation. Further, any permissions or appeal decisions on potential sites may also alter a site's potential for allocation.

2.8 **As such, the current residual need (for PPTS-households in the first five years) is a range of between +89 pitches (surplus, if all identified pitches are found to be deliverable) to -154 pitches (deficit, if only the existing 'GT1' site allocations remain deliverable).**

2.9 **At this stage, the Council expects the true position to be somewhere in between these two extremes but is not in a position to be any more precise.**

Statement of Common Ground Agreement

2.10 In the context of the above, Maidstone Borough Council and Swale Borough Council current position on matters are as follows:

Strategic Matter 1 (SM1):	Quantum of identified needs
	Maidstone: The quantum of accommodation need identified through Maidstone's GTAA for Gypsy, Traveller and Travelling Showpeople households (PPTS, Annex 1 definition) over the period 2023 to 2040 is 407 pitches and 4 plots. The quantum of accommodation need identified through Maidstone's GTAA for Gypsy, Traveller and Travelling Showpeople households (PPTS, Annex 1 definition) over the first 5 years (2023 to 2027) is 251 pitches and 2 plots. The net requirement for Maidstone Borough over the first 5 years (2023 to 2027), taking into account the 75 permanent permissions already granted, is 176 pitches and 2 plots. Swale: The quantum of need identified through Swale's GTAA for Gypsy, Traveller and Travelling Showpeople households over the period 2022/23 to 2037/38 is 114 pitches and zero plots.
Current position:	This matter is <u>Agreed.</u> Both authorities agree the baseline need as per the published GTAA's but acknowledge that this evidence collection gives a 'point in time' output that may change over time.
Next steps:	Both authorities will continue to monitor the delivery of pitches/plots in their administrative areas which may alter the net pitch/plot needs required in their plan.

Strategic Matter 2 (SM2):	Meeting identified needs
	Maidstone: As set out in the Regulation 18c plan and this SoCG, Maidstone intend to meet the need through a combination of site allocations; existing authorised permanent sites or land adjacent (collectively a 'broad location'); and then through windfall (new) sites. At this Regulation 18c stage, Maidstone Borough Council is unable to confirm whether it is in a position to meet identified needs in full over the plan period.

It is also unable to confirm whether it is in a position to meet identified needs in the first 5-years of the plan through deliverable site allocations.

If MBC cannot meet its needs in full and/or cannot meet identified needs in the first 5-years of the plan through deliverable site allocations, it is likely to formally ask neighbouring authorities if they can help meet unmet need through the formal Duty to Cooperate process.

Swale: Over the immediate five years after the GTAA study there is a potential for an additional 72 to 78 authorised pitches to become available through regularisation and expansion/intensification plus 4 more through turnover on existing sites and, that these supplies result in a potential 76 to 82 pitches that could meet the overall need in the short-term and would result in a longer-term need for 34 pitches.

A significant proportion of the immediate need could be met through existing sites however there is also a longer-term need that could be address through suitable windfall sites. Therefore, a criteria-based policy will guide planning applications for new sites that come forward, together with proposals for the extension and/or intensification of existing sites.

Current position:	This matter is <u>under discussion.</u> Both authorities will continue ongoing discussions regarding the level of need that can be met within each administrative boundary, with further clarity on precise pitch/plot numbers to be delivered.
Next steps:	Maidstone will continue to assess site suitability and capacity, refining the level of need that could be accommodated within the borough and any resultant unmet need that cannot be accommodated within the borough. Assistance from neighbouring authorities in meeting any unmet need may then be requested under the Duty to Cooperate. Swale will to seek to meet identified needs within their administrative boundary through the Local Plan process, and will respond accordingly to any formal request to help meet any of Maidstone's unmet need under the Duty to Cooperate.

Other strategic matters

2.11 There are no further strategic matters specifically relating to Maidstone's Gypsy, Traveller and Travelling Showpeople DPD.

3. Governance Arrangements

Duty to Cooperate Protocol

Maidstone Borough Council

3.1 Joint working activities with neighbouring authorities follow a tiered approach in order that strategic matters could be considered in further detail, and any issues may be escalated where required. The tiered approach is as follows:

- **Level 1:** A broad range of issues and strategic matters are discussed in detail at officer level. In the latter stages of the plan these meetings take place in consultation with the Cabinet Member for Planning Policy and Management to ensure political oversight and continuity across all levels.
- **Level 2:** More complex issues and matters of agreement and disagreement are escalated to discussed at senior officer level. This involves the relevant directors and/or Chief Executive and takes place in consultation with the Cabinet Member for Planning Policy and Management.
- **Level 3:** Any unresolved issues and key matters of agreement and disagreement are discussed at member level meetings. Member level meetings involve the Cabinet Member for Planning Policy and Management, as well as the Cabinet Member for the Policy and Recourses Committee.

3.2 Once key matters of agreement or disagreement are identified by officers, these will be set out in a draft SoCG. All SoCGs in the Borough need to be taken through the Committee process for sign off by Cabinet or Cabinet Member.³

Swale Borough Council

3.3 In responding to Duty to Cooperate raised by other Local Authorities on general matters of Plan drafting Swale Borough Council operates a delegated authority to officer's approach. This involves setting out where Swale is in agreement, disagreement and under discussion on those matters with the other Local Authority. This approach is required to be signed off by the chair of the Policy and Resources Committee in consultation with the chair and deputy chair of the members Planning and Transportation Policy Working Group.

³ The sign off governance process for Statements of Common Ground was amended in April 2026 to delegate this to Head of Planning & Economic Development. As such the position as of the governance proposal at Reg 18c is correct, but the SoCG is signed by the Head of Planning and Economic Development.

- 3.4 For strategic matters that have specific impact on Swale officers are required to take a formal report setting out recommendations on matters of agreement, disagreement and under discussion to the Policy and Resources committee for their agreement.

4. Next Steps

Actions

- 4.1 Below are the list of actions that officers will undertake between Regulation 18c and Regulation 19:
- Detailed assessment of Regulation 18c potential site allocations will continue, as the Council seeks to refine and confirm precise pitch numbers suitable for inclusion in the Regulation 19 plan.
 - Discussions with the Council's Housing Team on the progress made towards identifying suitable land for delivery of a new public site of up to 15 affordable pitches.
 - Receive feedback/confirmation from site owners of existing LPR 'GT1' allocations as to the continued availability and deliverability of their allocated sites in the plan.
 - Receive feedback/confirmation from LPR 'omission site' landowners/promoters as to whether their sites may be considered for development of Gypsy and Traveller pitches or Travelling Showpeople plots.
 - Receive feedback from PINS advisory meeting as to the merits in the approach of acknowledging that existing authorised sites are already permitted for such use and that applications for additional pitches could be assessed via criteria-based policy as opposed to requiring formal allocation, versus formally allocating existing sites for additional pitches.
 - Calculate precise pitch/plot needs that can be met within the borough and approach neighbouring LPAs to formally ask for help in meeting any remaining unmet need.
- 4.2 Feedback from this process and updates to matters within the SoCG will be made, with a view to moving matters from 'under discussion' to 'agreed' or 'not agreed' as appropriate.
- 4.3 An updated Duty to Cooperate Statement and SoCG are to be published alongside the Regulation 19 draft submission plan.

Plan timetable

4.4 A final Statement of Common Ground will be signed by all parties at the submission of the Gypsy, Traveller and Travelling Showpeople Development #Plan Document.

4.5 The following table shows plan-making timetable for Maidstone's Gypsy, Traveller and Travelling Showpeople DPD:

Date	Milestone
February 2023	Scoping, Issues and Options consultation (Regulation 18a)
October 2024	Preferred Approaches consultation (Regulation 18b)
November 2025	Preferred Policies and Potential Sites consultation (Regulation 18c)
June 2026	Proposed Submission consultation (Regulation 19)
December 2026	Submission of Plan to Secretary of State (Regulation 22)
March 2027	Examination in Public (regulation 14)
July 2027	Main Modifications public consultation (if required)
January 2028	Adoption of Plan (Regulation 26)

4.6 The following table shows plan-making timetable for Swale's Local Plan, where the strategic matter of Gypsy and Traveller accommodation needs will be addressed:

Date	Milestone
January to February 2026	Publication of Regulation 18
July to September 2026	Publication of submission draft (Reg 19)
October to December 2026	Submission of Plan for Examination (with results of the public consultation) Reg 22
April to June 2027	Examination hearing sessions (Reg 24) *
July to September 2027	Main modifications consultation *
October to December 2027	Adoption, Full Council (Regulation 26) *

Asterisks are indicative time frames as finalisation of dates will be dependent on the availability of the Planning Inspectorate.

5. Appendices

Appendix A: Record of engagement and cooperation

Date	Type	Meeting with	Topic Area(s)	Content summary	Relevant actions/ outcomes
08/11/2023	Online meeting	Swale Borough Council	LPR update; G&T DPD and GTAA	LPR - MM consultation and G&T policies within LPR, G&T DPD - New GTAA published and indicates a full cultural need of 529, next stage is pitch deliverability assessment, reasonable alternatives will be required. Swale = initial need of c.30 has been met, new GTAA has been undertaken	Further DtC meetings will be required
07/11/2024	Online meeting	Swale Borough Council	Gypsy & Traveller DPD	Update on the MBC GTAA/DPD; likely to come to neighbouring authorities to help meet need. Update on Swale local plan and GTAA; likely to be a shortfall towards the end of the plan period.	Notes to be circulated
13/11/2025	Online meeting	Swale Borough Council	Gypsy & Traveller DPD, New Local Plan	Discussed Swale BC emerging Local Plan - Regulation 18 to be consulted on in Jan 2026 - will only contain vision, objectives and DM policies. No spatial strategy or sites. Aim to submit plan under current NPPF transition arrangements and current planning system. MBC discussed emerging GT DPD and the fact that we are unlikely to meet full needs. May need to formally ask for help in meeting needs under DtC. Suggested SoCG - MBC to share draft SoCG specifically in relation to GT DPD. MBC briefly updated Swale on Cabinet decision to commence preparation of new Local Plan under new planning system.	MBC to share draft SoCG for GT DPD with Swale for comment and agreement of content.

Date	Type	Meeting with	Topic Area(s)	Content summary	Relevant actions/ outcomes
16/12/2025	Online meeting	Swale Borough Council	Gypsy & Traveller DPD, New Local Plan	Potential sites are high-level and include all options except those clearly unsuitable (e.g., green belt, flood zones); sites from the 2017 Local Plan and Local Plan Review are carried forward; their relevance will be reassessed through landowner discussions; advisory meeting with PINS indicated that existing authorised sites will need to be assessed for allocation and undetermined sites will need to be allocated.	Send covering letter and draft Statement of Common Ground, asking if they can meet unmet need.

Appendix B: Summary of representations during formal consultation stages

Regulation 18A

None received.

Regulation 18B

SBC have no comments to make on Maidstone Borough Councils' (MBC) approach to meeting Gypsy and Traveller need.

As MBC goes on to identify its sites and growth approach for Gypsy and Travellers, SBC would like to request early engagement before any formal consultation where there maybe potential cross boundary matters between MBC and SBC.

SBC acknowledges the duty to cooperate matters set out in your consultation.

SBC would like to make clear that we do not have a 5-year supply of sites to meet our Gypsy and Traveller need and that it is highly unlikely that we will be able to accommodate any potential unmet arising from Maidstone in the foreseeable future.

Regulation 18C

No new sites on the boundary between Swale and Maidstone in Policy TR4. However, an existing site near the border of Swale GT(LPR10) The Ash, Yelsted Road, is allowed to intensify by approximately 5 pitches (net gain), subject to planning permission. Swale would request early engagement on this site.

SBC acknowledges the duty to cooperate matters set out in your consultation.

SBC would like to make clear that we do not have a 5-year supply of sites to meet our Gypsy and Traveller need and that it is highly unlikely that we will be able to accommodate any potential unmet arising from Maidstone in the foreseeable future.