

Gypsy and Traveller and Travelling Showperson Accommodation Assessment 2025

Tonbridge and Malling Borough Council

Final Report
October 2025

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Executive Summary

Introduction

The Tonbridge and Malling Borough Council 2025 Gypsy and Traveller Accommodation Assessment (GTAA) has been prepared by arc4 Ltd. The GTAA provides the latest available evidence to identify the accommodation needs of Gypsies and Travellers and Travelling Showpeople across the borough.

The GTAA has included:

- A review of existing (secondary) data.
- Stakeholder consultation with a range of stakeholders.
- Site visits and a household survey. There is a total of 82 existing pitches across 19 sites, of these, 61 pitches are occupied by 50 households, and 21 pitches are vacant. Several households occupy more than one pitch.
- Information for 46 out of 50 Gypsy and Traveller households have been obtained, either through a household survey (36 households) and 10 from information obtained from the 2021 GTAA as several households said their circumstances and needs had not changed. In addition, information for three households in bricks and mortar accommodation and one household currently living out of the area but wanted to return was obtained.
- Interview with a Travelling Showperson resident who provided data for both existing yards.

Data has been carefully analysed to provide a picture of current provision across Tonbridge and Malling and to assess future need. The findings of the study provide an up-to-date, robust and defensible evidence base for policy development.

We are very grateful to the Gypsy, Traveller and Travelling Showperson communities across Tonbridge and Malling borough for their positive engagement with this work.

Population and current accommodation provision

The 2021 Census identified a population of 460 people who identified as 'White: Gypsy or Irish Traveller' or 'Gypsy/Romany' and 4 Roma. There is an estimate of 150 households where the household reference person identifies as being a Gypsy/Traveller.

Across Tonbridge and Malling borough there are a total of 82 pitches across the following 19 sites:

- 2 council sites (40 pitches, 27 occupied by 26 households, 13 vacant)
- 8 private authorised sites (24 pitches, 20 occupied by 13 households, 4 vacant)
- 2 private temporary authorised sites (3 pitches, 3 occupied by 3 households, 0 vacant)
- 7 unauthorised sites (15 pitches, 11 occupied by 8 households, 4 vacant)

There are also 2 Travelling Showpersons Yards (4 plots, 4 households, 0 vacant)

In January and July each year, Councils carry out a Traveller caravan count to inform MHCLG statistics. The latest seven bi-annual MHCLG Traveller caravan counts (January 2022 to January 2025) recorded an average of 97 caravans across all sites in Tonbridge and Malling borough. The January 2025 count recorded 89 caravans of which 50 were social rented pitches, 26 on private authorised pitches and 13 on unauthorised pitches.

An average of 7 Travelling Showperson caravans have been reported in the period 2021 to 2025. In January 2025, there were 7 caravans reported on private yards.

Planning policy requirements for needs assessments

The 2024 National Planning Policy Framework (NPPF) states in Paragraph 63 *‘the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policy (including travellers)’*. A footnote in the NPPF then states *‘Planning Policy for Traveller Sites sets out how travellers’ housing needs should be assessed for those covered by the definition in Annex 1 of that document’*.

The 2024 Planning Policy for Traveller Site (PPTS) document states that *‘local planning authorities should make their own assessment of need for the purposes of planning’* and *‘ensure that their local plan includes fair, realistic and inclusive policies’* and *‘to increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply’*.

In the absence of further guidance on preparing GTAAAs, the methods adopted by arc⁴ reflect the PPTS, build upon those methods established through previous guidance, our practical experience and decisions made at planning inquiries and appeals.

Need assessment period

Need has been assessed over a short-term period 2025/26 to 2029/30, and the longer-term period 2030/31 to 2041/42, to align this with the emerging Local Plan period.

Gypsy and Traveller pitch requirements

For the period 2025/26 to 2041/42, there is a need for 33 additional Gypsy and Traveller pitches across Tonbridge and Malling borough (Table ES1). Of this need, 12 pitches are needed in the first five years and 21 over the longer-term period 2030/31 to 2041/42.

Needs analysis considers the needs arising from existing households, households on unauthorised sites, newly forming households, in-migrant households and current vacancies on existing sites. Needs analysis also takes into account households on the housing waiting list for pitches on public sites. The main drivers of need across the borough are from households currently living on unauthorised sites and new household formation.

Table ES1 Gypsy and Traveller pitch need 2025/26 to 2041/42

Residential Pitch need	Tonbridge and Malling Borough
5yr Authorised Pitch Shortfall (2025/26 to 2029/30) (A)	12
Longer-term need	
<i>Over period 2030/31 to 2034/35 (B)</i>	6
<i>Over period 2035/36 to 2039/40 (C)</i>	9
<i>Over period 2040/41 to 2041/42 (D)</i>	6
Longer-term need TOTAL (E)=B+C+D	21
TOTAL SHORTFALL 2025/26 to 2041/42 (A + E)	33

The overall scale of need is lower to that reported in the 2022 GTAA. This reported a total need for 41 pitches over the period 2021/2 to 2039/40.

Meeting the need

There is a potential supply of additional authorised pitches through:

- Potential regularisation of existing pitches on sites that are not permanently authorised (18 pitches)
- Potential intensification of existing permanent authorised sites (26 pitches)

This would provide 44 additional authorised pitches and meet identified needs.

There is also potential supply through the potential expansion/intensification of temporary authorised sites (4 pitches), potential household dissolution over the plan period (9 pitches) and turnover on social rented pitches.

Notwithstanding evidence in this GTAA on need, additional need may arise over the plan period, for instance households moving into Tonbridge and Malling. It is therefore recommended the Council has criteria-based policies to inform future planning applications for private sites should these be submitted.

Transit provision

Although the level of unauthorised encampment activity is low and only a minority of household survey respondents in 2021 and 2025 indicated there is a need for transit provision, it is recommended that the Council introduces negotiated stopping arrangements to support any future transit need. This is an important consideration given the potential criminalisation of stopping on land legislated for in the Police, Crime, Sentencing and Courts Act 2022.

Travelling Showperson plot requirements

There are two Travelling Showperson yards in Tonbridge and Malling. Interviews carried out as part of the 2025 GTAA indicated there was sufficient capacity to meet needs on the existing yards. However, it is recommended that the Council develop a criteria-based policy to consider any applications coming forward over the plan period.

1. Introduction

Overview

- 1.1 In July 2025, arc⁴ were re-commissioned by Tonbridge and Malling Borough Council (TMBC) to prepare a 2025 Gypsy, Traveller and Travelling Showperson Accommodation Assessment (GTAA). This report updates the findings of the previous 2022 study.
- 1.2 The overall scope of the study is to ensure that the Council has a robust evidence base to determine an appropriate level of residential pitch and transit provision needed over the period 2025/26 to 2041/52 for Gypsies and Travellers and plots for Travelling Showpeople.
- 1.3 The National Planning Policy Framework (NPPF), Planning Policy for Traveller Sites (PPTS) and section 124 of the Housing and Planning Act 2016 provide the policy context for this work.

Who the study covers?

- 1.4 The 2024 Planning Policy for Traveller Sites provides the updated definition of Gypsies and Travellers as set out within Annex 1 of the 2024 PPTS:
“Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependants’ educational or health needs or old age have ceased to travel temporarily or permanently, and all other persons with a cultural tradition of nomadism or of living in a caravan, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.”
- 1.5 Similarly, the following definition from Annex 1 of the Guidance in respect of Travelling Showpeople is used:
‘Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family’s or dependants’ more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers as defined above.’
- 1.6 In addition:
‘For the purposes of this planning policy, “pitch” means a pitch on a “gypsy and traveller” site and “plot” means a pitch on a “travelling showpeople” site (often called a “yard”). This terminology differentiates between residential pitches for “gypsies and travellers” and mixed-use pitches for “travelling showpeople”, which may/will need to incorporate space or to be split to allow for the storage of equipment.’ (DCLG Planning policy for traveller sites December 2024 Annex 1, para 5).
- 1.7 For the purposes of this study, therefore, Gypsies and Travellers live on pitches within sites, whilst Travelling Showpeople live on plots within yards.

Report structure

1.8 The GTAA 2025 report structure is as follows:

- **Chapter 1 Introduction:** provides an overview of the study.
- **Chapter 2 Policy and local context:** presents a review of the national policy context which guides the study.
- **Chapter 3 Methodology:** provides details of the study's research methodology.
- **Chapter 4 Review of current Gypsy and Traveller population and provision of pitches/plots:** reviews estimates of the Gypsy and Traveller and Travelling Showpeople population across the borough and existing site/yard provision.
- **Chapter 5 Household survey:** presents relevant data obtained from the household survey research.
- **Chapter 6 Pitch/plot/transit requirements:** focuses on current and future pitch/plot requirements. This chapter includes a detailed assessment of drivers of demand, supply and current shortfalls across the borough.
- **Chapter 7 Conclusion and strategic response:** concludes the report, providing brief summary of key findings and recommendations.

1.9 The report is supplemented by the following appendices:

- **Appendix A** Household questionnaires.
- **Appendix B** Glossary of terms.

2. Policy and local context

- 2.1 This study is grounded in an understanding of the national legislative and planning policy context that underpins the assessment and provision of accommodation for Gypsies and Travellers and Travelling Showpeople.
- 2.2 This chapter sets out the policy context within which this GTAA has been prepared, including a consideration of the previous GTAA for Tonbridge and Malling.

Government policy and guidance

- 2.3 The 2024 National Planning Policy Framework states in Paragraph 63 **‘the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies’**. It then lists a number of groups including Travellers. A footnote to the paragraph states **‘Planning Policy for Traveller Sites sets out how travellers’ housing needs should be assessed for those covered by the definition in Annex 1 of that document’**.
- 2.4 The 2024 Planning Policy for Traveller Sites (PPTS) document states that **‘local planning authorities should make their own assessment of need for the purposes of planning’** and **‘ensure that their local plan includes fair, realistic and inclusive policies’** and **‘to increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply’**.
- 2.5 Policy A of the 2024 PPTS relates to evidence needed to plan positively and manage development. This states **‘in assembling the evidence base necessary to support their planning approach, local planning authorities should:**
- **pay particular attention to early and effective community engagement with both settled and traveller communities (including discussing travellers’ accommodation needs with travellers themselves, their representative bodies and local support groups);**
 - **cooperate with travellers, their representative bodies and local support groups; other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of the likely permanent and transit accommodation needs of their areas over the lifespan of their development plan, working collaboratively with neighbouring local planning authorities; and**
 - **use a robust evidence base to establish accommodation needs to inform the preparation of local plans and make planning decisions’**.
- 2.6 In the absence of further guidance on preparing GTAAs, the methods adopted by arc⁴ reflect Policy A of the PPTS; build upon those methods established through previous guidance; our practical experience and findings from planning inquiries and appeals.
- 2.7 The calculation of pitch/plot requirements is based on established DCLG modelling methodology, as advocated in *Gypsy and Traveller Accommodation*

Needs Assessment Guidance (DCLG, 2007). Although this guidance was formally withdrawn in December 2016, in the absence of any updated guidance on the subject, it continues to provide a good practice approach for needs modelling.

2.8 Policy B of the 2024 PPTS relates to planning for traveller sites and requires Local Plans:

- to be prepared with the objective of contributing to the achievement of sustainable development and consistent with the policies of the NPPF; and
- to set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople as defined in Annex 1 which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities.

2.9 Policy B (paragraph 10) sets out that local authorities should, in producing their Local Plan:

- a. identify and update annually, a supply of specific deliverable sites sufficient to provide 5-years' worth of sites against their locally set targets;
- b. identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15;
- c. consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints (local planning authorities have a duty to cooperate on planning issues that cross administrative boundaries);
- d. relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density; and
- e. protect local amenity and environment.

2.10 Policy B (paragraph 13) sets out that local authorities should ensure that traveller sites are sustainable economically, socially and environmentally and therefore ensure that their policies:

- a. promote peaceful and integrated co-existence between the site and the local community;
- b. promote, in collaboration with commissioners of health services, access to appropriate health services;
- c. ensure that children can attend school on a regular basis;
- d. provide a settled base that reduces both the need for long-distance travelling and possible environmental damage caused by unauthorised encampment;
- e. provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well-being of any travellers who may locate there or on others as a result of new development;

- f. avoid placing undue pressure on local infrastructure and services;
- g. do not locate sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans; and
- h. reflect the extent to which traditional lifestyles (whereby some travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability.

Intentional unauthorised development

- 2.11 The planning policy statement issued with PPTS 2015 ([click here for link to statement](#)) and confirmed by Ministerial Statement ([click here for link to Ministerial Statement](#)) makes clear that if a site is intentionally occupied without planning permission this would be a material consideration in any retrospective planning application for that site. Whilst this does not mean that retrospective applications will be automatically refused, it does mean that failure to seek permission in advance of occupation will count against the application.
- 2.12 In addition, PPTS 2024 (paragraph 12) makes clear that in exceptional cases where a local authority is burdened by a large-scale unauthorised site that has significantly increased their need, and their area is subject to strict and special planning constraints, then there is no assumption that the local authority will be required to meet their Gypsy and Traveller site needs in full. This is intended to protect local planning authorities with significant land constraints from being required to provide for additional needs arising directly from large sites such as Dale Farm (a large unauthorised site in Essex).

Responding to challenges

- 2.13 GTAAAs are subject to intense scrutiny, particularly at planning inquiries and hearings. The methodological approaches taken by arc⁴ aim to maximise the robustness of evidence and measures include:
 - An up-to-date assessment of the number of pitches on sites and the number of households living on pitches and any vacancies.
 - Maximising response rates from households.
 - Carefully considering the relationship between households and the pitches they occupy.
 - Sensitive analysis of the flows of existing households from and to districts.
 - Consideration of overcrowding and concealed households.
 - Careful consideration of turnover on council/housing association pitches, with clear assumptions over future potential capacity from households moving away from pitches.
 - Longer-term modelling of need using detailed demographic information contained from household survey work.
 - Reasonable assumptions around the number of households in bricks and mortar accommodation who may want to move to a pitch.

Further review of the PPTS

- 2.14 The government has stated in its response to changes to the NPPF that **‘in the context of our wider reforms to planning policy, we will review the PPTS next year’** i.e. 2025.

3. Methodology

Introduction

- 3.1 The GTAA research method is grounded in an understanding of the requirement of the NPPF and based on an established methodology which regularly withstands scrutiny at planning inquiries and hearings.
- 3.2 The methodology has comprised:
- a desktop analysis of existing documents, including data on pitches/sites, plots/yards and unauthorised encampments;
 - the collection of primary data, including household interviews with Gypsies and Travellers and Travelling Showpeople;
 - an assessment of accommodation needs taking into account all available data and information.
- 3.3 The information gathering has been carried out in three phases, as outlined below:
- Phase 1: Literature/desktop review.
 - Phase 2: Survey of Gypsies and Travellers and Travelling Showpeople across Tonbridge and Malling.
 - Phase 3: Needs assessment and production of the GTAA 2025 report.

Phase 1: Literature/desktop review and steering group discussions

- 3.4 We have reviewed relevant literature, including legislative background and best practice information; and analysis of available secondary data relating to Gypsies and Travellers and Travelling Showpeople in the borough. The research has been overseen by officers from the local authority's policy team.

Phase 2: Fieldwork survey and interviews with Gypsies and Travellers and Travelling Showpeople

- 3.5 Our aim is to obtain interviews from all households living on sites using a standard questionnaire (Appendix A). This questionnaire has been carefully designed in consultation with Councils, feedback from community representatives and planning agents. Site visits and interviews took place during July, August and September 2025.
- 3.6 A total of 51 Gypsy and Traveller households live on pitches on sites in the borough. Interviews were achieved with 37 households living on sites. In addition, data for 10 from information obtained from the 2021 GTAA as several households said their circumstances and needs had not changed. In addition, information for two households in bricks and mortar accommodation and one household currently living out of the area but wanted to return was obtained.
- 3.7 Information on the needs of Travelling Showpeople was obtained from interviews with households living on yards in the borough.

Phase 3: Needs assessment and production of report

- 3.8 A detailed explanation of the pitch requirements is contained in Chapter 7 but briefly comprises analysis of the following:
- current pitch supply, households living in bricks and mortar accommodation; households planning to move in the next five years, and emerging households to give total need for pitches; and
 - supply based on the number of authorised pitches and turnover on sites on public pitches.
- 3.9 The overall need for pitches is then compared with the overall supply.

Pitches and households

- 3.10 One of the key challenges faced when assessing Gypsy and Traveller pitch requirements is the actual nature of pitches and how this relates to the number of households they can support.
- 3.11 PPTS 2024 refers to the need for local planning authorities to **‘identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years’ worth of sites against their locally set targets’ and ‘relate the number of pitches/plots to the circumstances of the specific size and location of the site and the surrounding population’s size and density’** (PPTS 2024, paragraph 10).
- 3.12 Planning decision notices usually refer to the number of pitches on a site or the specifics of what can be on a pitch e.g. statics, tourers; or specific individuals and/or households.
- 3.13 As part of the GTAA, it is essential that the characteristics of sites, the number of pitches and how many households these can support is carefully considered. There are a range of issues which need to be considered when reviewing site and pitch characteristics and their potential implications for future pitch and site requirements which are now summarised.

Site and pitch size

- 3.14 There are no definitive parameters for site or pitch sizes. Although now withdrawn, the DCLG Designing Gypsy and Traveller sites: good practice guide (2008) states in paragraph 4.4 that **‘Gypsy and Traveller sites are designed to provide land per household which is suitable for a mobile home, touring caravan and a utility building, together with space for parking. Sites of various sizes, layouts and pitch numbers operate successfully today and work best when they take into account the size of the site and the needs and demographics of the families resident on them’**.
- 3.15 Paragraph 4.47 states that **‘to ensure fire safety it is essential that every trailer, caravan or park home must be not less than 6 metres from any other trailer, caravan or park home that is occupied separately’**.
- 3.16 Paragraph 7.12 states that **‘as a general guide, it is possible to specify that an average family pitch must be capable of accommodating an amenity building, a large trailer and touring caravan (or two trailers, drying space**

for clothes, a lockable shed (for bicycles, wheelchair storage etc.), parking space for two vehicles and a small garden area’.

- 3.17 Paragraph 4.13 states that **‘smaller pitches must be able to accommodate at least an amenity building, a large trailer, drying space for clothes and parking for at least one vehicle’.**
- 3.18 As a general guide, it is suggested by arc⁴ that the minimum pitch size is 25m by 25m (625 square meters or 0.0625 hectares). This would support a twin-unit chalet/mobile home (15m x 6.5m), a tourer, an amenity shed/building (5m x 4m), two vehicle spaces (minimum 2.4m x 4.8m for each space) and turning circle for vehicles, amenity space and a small garden area/play space. Residential units need to be 3m from the pitch boundary and at least 6m apart. A slightly larger pitch of 25m by 30m (750 square meters or 0.075 hectares) would be appropriate for larger household units requiring several residential units. Additionally, it may be appropriate to have several caravans on a pitch to accommodate newly forming households who may require independent accommodation but want to stay living as part of an extended family group.
- 3.19 It is generally accepted amongst the Travelling community that private sites of up to 6-10 pitches are appropriate. Public sites tend to be larger and have policies and procedures in place to ensure the effective management of sites.
- 3.20 In 2010, the Showmen’s Guild of Great Britain prepared a document ‘Travelling Showpeople’s sites: a planning focus – model standard package). This document was intended to provide guidelines for Travelling Showpeople and Local Planning Authorities when considering the needs of Travelling Showpeople.
- 3.21 This document confirmed that:
 - A plot is a piece of land occupied by a Showperson with their family and equipment, used to store fairground rides, vehicles and other items as well as for living accommodation. The family unit can be large or small, for instance an extended family with grandparents, parents and children, or a single-family unit of parents and children.
 - A yard is two or more plots owned by the same family who may use this for their own family purposes or may let part out to other Showpeople.
 - A site is a group of plots where the land is owned by individual plot holders. Quite often a Showperson’s site will have a common shared access onto the main road network.
 - Showpeople’s sites do not fit neatly into the definition of a one land use category. The sites combine a residential use with a storage use, and maintenance is also likely to be carried out on site. The residential use can take the form of static homes and caravans.
 - For a Travelling Showperson yard, the minimum size of a plot is 0.5ha and should include space for residential accommodation and equipment storage.

Occupancy

- 3.22 A pitch may accommodate more than one family unit, for instance it could include a family, older children who have formed their own household and other family members. This could lead to potential overcrowding, and this is considered as part of the GTAA household survey.
- 3.23 Private sites may restrict occupancy to close family/friends. This limits opportunity for others to move onto the site, but this restrictive occupancy may provide for emerging needs within a household, for example as grown-up children (previously living within a parent(s) or grandparent(s) home) form independent households of their own.
- 3.24 It should also be noted that touring caravans on sites have the potential to help meet emerging need from household members which could be accommodated on existing pitches if appropriate space is available.
- 3.25 Quality, size of pitch and proximity of caravans on pitches vary dramatically.

Response

- 3.26 For each site, a pragmatic and reasonable judgement should be made as part of the GTAA regarding the number of pitches or sub-divisions on sites. This may relate to the number of families living on sites and could include a consideration of the potential intensification of sites (for instance through further sub-division, extension or use of vacant areas within the site). Capacity and layout of sites should be identified through site observation (directly or indirectly through Google maps or similar), planning history and local knowledge of planning, enforcement and liaison officers.
- 3.27 Pitches can become intensified or sub-divided once planning applications have been approved. These sub-divisions tend to be tolerated by Councils. Often pitches become subdivided to provide space for newly forming households, particularly from family members. The potential for pitch intensification/sub-division was considered on site visits and respondents were asked whether intensification/sub-division was possible on the site they lived on.

4. Review of the Gypsy, Traveller and Travelling Showpeople population and existing provision of pitches and plots

- 4.1 This chapter looks at the current picture in terms of the current population and demography of Gypsies and Travellers across Tonbridge and Malling before going on to explore the extent and nature of provision across the borough.

Census data

- 4.2 In October 2023, the ONS published detailed census data relating to Gypsy and Traveller populations. This provides valuable insights into the population dynamics and comparisons with overall populations
- 4.3 The 2021 Census identified a population of **460** people who identified as 'White: Gypsy or Irish Traveller' or 'Gypsy/Romany' and 4 Roma. There is an estimate of **150** households where the household reference person identifies as being a Gypsy/Traveller.
- 4.4 The previous 2011 Census reported 346 people and 131 households.
- 4.5 Table 4.1 sets out a range of data relating to people identifying as Gypsies and Travellers from the 2021 Census across Tonbridge and Malling. In summary:
- 78% live in bricks and mortar accommodation and 22% live in a caravan/mobile structure.
 - The majority of households rented (9% privately and 73% from a social landlord and 19% were owner occupiers.
 - 28% were overcrowded compared with 3.5% of the general population in the South East region.
 - 44% were single parents, 24% were couples with children, 7% singles, 5% couples and 20% were other household types.

Table 4.1 Characteristics of properties and households which are occupied by people identifying as Gypsy and Traveller from 2021 Census

Theme	Category	Number of people identifying as Gypsy/Traveller	% of people identifying as Gypsy/Traveller
Dwelling Stock	Detached whole house or bungalow	60	12.8
	Semi-detached whole house or bungalow	140	29.8
	Terraced (including end-terrace) whole house or bungalow	100	21.3
	Flat, maisonette or apartment	65	13.8
	A caravan or other mobile or temporary structure	105	22.3
	Total	470	100.0
Tenure	Owned: Owns outright	45	10.0
	Owned: Owns with a mortgage or loan or shared ownership	40	9.0
	Private rented or lives rent free	40	9.0
	Rented Social rented	340	73.0
	Total	465	100.0
Occupancy	Occupancy rating of bedrooms 0 or more	335	72.0
	Occupancy rating of bedrooms -1 or less (overcrowded)	130	28.0
	Total	465	100
Household composition	One person household: Aged 66 years and over	*	*
	One person household: Other	30	6.6
	Single family household: Couple family household: No children	25	5.5
	Single family household: Couple family household: Dependent children	95	20.9
	Single family household: Couple family household: All children non-dependent	15	3.3
	Single family household: Lone parent household	200	44.0
	Other household types	90	19.8
	Total	455	100.0
General Health	Very Good	220	47.3
	Good	135	29.0
	Fair	65	14.0
	Bad	45	9.7
	Very Bad	*	0.0
	Total	465	100.0
	Net health score (VG+G-B-VB)		66.7%

Source: 2021 Census. Note: * = small frequencies and not reported

- 4.6 In terms of health 76.3% of Gypsies and Travellers said their health was very good/good and 9.7% said it was bad/very bad. The overall net health satisfaction score (% saying very good/good minus bad/very bad) was 66.7% compared with 80.7% of the overall population.
- 4.7 Please note that the data reported from the census may differ from the findings of the household survey. This is because of the small population base of the Gypsy and Traveller population and data highly influenced by the level of response to both the 2021 Census and 2025 household survey. It is also important to note that an estimate of households in bricks and mortar is very difficult to establish.

Caravan Count information

- 4.8 Snapshot counts of the number of Gypsy and Traveller caravans were requested by the government in 1979 and have since been undertaken every January and July by local authorities. An annual count of Travelling Showperson caravans takes place every January. The counts provide a source of information on the number of caravans located on authorised and unauthorised sites but do not record the actual number of pitches on sites/yards.
- 4.9 The figures for the last six Traveller caravan counts for Tonbridge and Malling are set out in Table 4.2. Data shows an average of 97 caravans across the area during the period January 2022 to January 2025. Of these 51% were located on social rented sites, 32% on private sites and 17% on unauthorised sites. although there are caravans on unauthorised sites that should be included in future counts.

Table 4.2 Bi-annual Traveller caravan count figures: January 2022 to January 2025 for Tonbridge and Malling

	Authorised sites with planning permission			Unauthorised sites without planning permission	
Count Date	Social Rented	Total Private (Temporary)	Total Private (Permanent)	Total Unauthorised	Total
Jan 2022	50	0	26	13	89
Jul 2022	38	0	22	23	83
Jan 2023	41	7	21	15	84
Jul 2023	64	5	25	20	114
Jan 2024	48	6	30	14	98
Jul 2024	57	5	32	14	108
Jan 2025	46	6	35	14	101
7-Count Average (Jan 2022- Jan 2025)	49	4	27	16	97
7-Count % Average (Jan 2022- Jan 2025)	50.8%	4.3%	28.3%	16.6%	100%

Source: MHCLG Traveller Caravan Count, Live Table 1

- 4.10 Over the period 2021 to 2025 and average of 7 caravans on Travelling Showperson plots have been reported (Table 4.3).

Table 4.3 Annual Travelling Showperson caravan count figures: January 2021 to January 2025 for Tonbridge and Malling

	Authorised sites with planning permission		Unauthorised sites without planning permission	
Count Date	Social Rented	Total Private	Total Unauthorised (tolerated)	Total
2021	0	5	0	5
2022	0	5	0	5
2023	0	10	0	10
2024	0	8	0	8
2025	0	7	0	7
5 -count % Average	0	0	0	7

Source: MHCLG Travelling Showpeople Caravan Count, Live Table 3

Local site and yards

- 4.11 There are several ways in which sites can be described which are associated with their planning status. Authorised sites are those with planning permission and can be on either public or privately-owned land. Unauthorised sites are made up of either longer-term (approximately three months or longer) unauthorised encampments and can be considered to be indicative of a permanent need for accommodation (in some instances local authorities class these as tolerated sites and do not take enforcement action to remove them); and unauthorised developments, where Travellers are residing upon land that they own and that does not have planning permission (see Appendix B for more detailed definitions).
- 4.12 Table 4.4 sets out assumptions regarding pitches and household occupancy on each site. This provides a transparent base position from which the modelling of future pitches in section 6 need can proceed.
- 4.13 Across Tonbridge and Malling borough there are a total of 83 pitches across the following sites:
- 2 council sites (40 pitches, 27 occupied by 26 households, 13 vacant)
 - 8 private authorised sites (24 pitches, 20 occupied by 13 households, 4 vacant)
 - 2 private temporary authorised sites (3 pitches, 3 occupied by 3 households, 0 vacant)
 - 7 unauthorised sites (15 pitches, 11 occupied by 8 households, 4 vacant)
- 4.14 There are also 2 Travelling Showpersons Yards (4 plots, 4 households, 0 vacant).

Table 4.4 List of Gypsy & Traveller sites in Tonbridge and Malling (as at July 2025)

Site Code	Address	Planning status	Total Pitches	Total occupied pitches	Total vacant pitches	Total households	Interview 2025	2021 GTAA	Other data	Not available/refused	Total household responses
LA1	Windmill Lane, Teston Road, West Malling ME19 6PQ	Permanent Authorised (Kent County Council managed)	14	12	2	11	10			1	10
LA2	Coldharbour Lane, Aylesford ME20 7NZ	Permanent Authorised (Kent County Council owned and managed)	26	15	11	15	15				15
Priv1	Springfield Place (Rear of The Harrow Public House), Cemetery Lane, Hadlow TN11 0LT	Private Authorised	4	4	0	4		4			4
Priv2	Orchard Place/Land to the rear of Swinburn, Teston Rd, Offham, West Malling, ME19 5PD	Private Authorised	5	5	0	1		1			1
Priv3 (now bricks and mortar)	Sunny Paddock/Meadow, 14 Birling Rd, Leybourne ME19 5HT	Private Authorised	0	0	0	1	1				1
Priv4	76 Church Lane, East Peckham TN12 5JH	Private Authorised									
Priv6	Hoath Wood, Lavenders Road, West Malling ME19 6HP	Private Authorised	1	1	0	1		1			1
Priv7	Old Orchard, Rochester Road, Aylesford ME20 7ED	Private Authorised	2	2	0	1	1				1

Site Code	Address	Planning status	Total Pitches	Total occupied pitches	Total vacant pitches	Total households	Interview 2025	2021 GTAA	Other data	Not available/ refused	Total household responses
Priv8	Woodford, Old Lane, Ightham TN15 9AH	Private Authorised	5	1	4	1		1			1
Priv9	East Acres, Branbridges Road, East Peckham TN12 5HD	Private Authorised	1	1		1				1	0
Priv10	The Horseshoes, Sandy Lane, Ryarsh ME19 6TG	Private Authorised	3	3	0	1		1			1
Priv11	The Spinney, Land West of Wrotham Heath House, London Road TN15 7RS	Private Authorised	3	3	0	3	3				3
PrivTemp1	Alans Hectare, Cemetery Lane, Hadlow TN11 0LT	Private Temporary Authorised	2	2	0	2	2				2
PrivTemp2	The Paddock, Pilgrims Way, Rochester Road, ME1 3SN	Temp Authorised	1	1	0	1	1				1
Unauth1	Rear of Offham Methodist Church, Hayes Lane, Offham ME19 5PG	Unauthorised	2	2		1		1			1
Unauth2	The Hollies/Land North of Askew Bridge/Builders Yard, Maidstone Rd, Platt TN15 8LB	Unauthorised	4		4						
Unauth3	Malling Meadows, Land East of Teston Road, West Malling ME19 6PQ	Unauthorised	2	2	0	1		1			1

Site Code	Address	Planning status	Total Pitches	Total occupied pitches	Total vacant pitches	Total households	Interview 2025	2021 GTAA	Other data	Not available/ refused	Total household responses
Unauth4	Laxton Farm and Land West of Laxton Farm, Common Road Hadlow TN11 0JE	Unauthorised	1	1	0	1				1	0
Unauth5	The Orchards, Common Road, Hadlow TN11 0JD AKA Land SE of the Croft, Common Road, Hadlow, Tonbridge, TN11 0JD and Land off Maidstone Road	Unauthorised	1	1	0	1				1	0
Unauth6	Birchwood Farm, Land off the Paddocks, Birling Road, Leybourne, West Malling, ME19 5HZ	Unauthorised (application being determined)	4	4	0	3	3				3
Unauth7	Sunny Paddock/Meadow, 14 Birling Rd, Leybourne ME19 5HT	Unauthorised	1	1	0	1	1				1
TOTAL			82	61	21	50	36	10	0	4	46

NOTE: Where possible site codes are based on the 2022 GTAA.

Priv3 former authorised pitch now classified as a C3 dwelling house

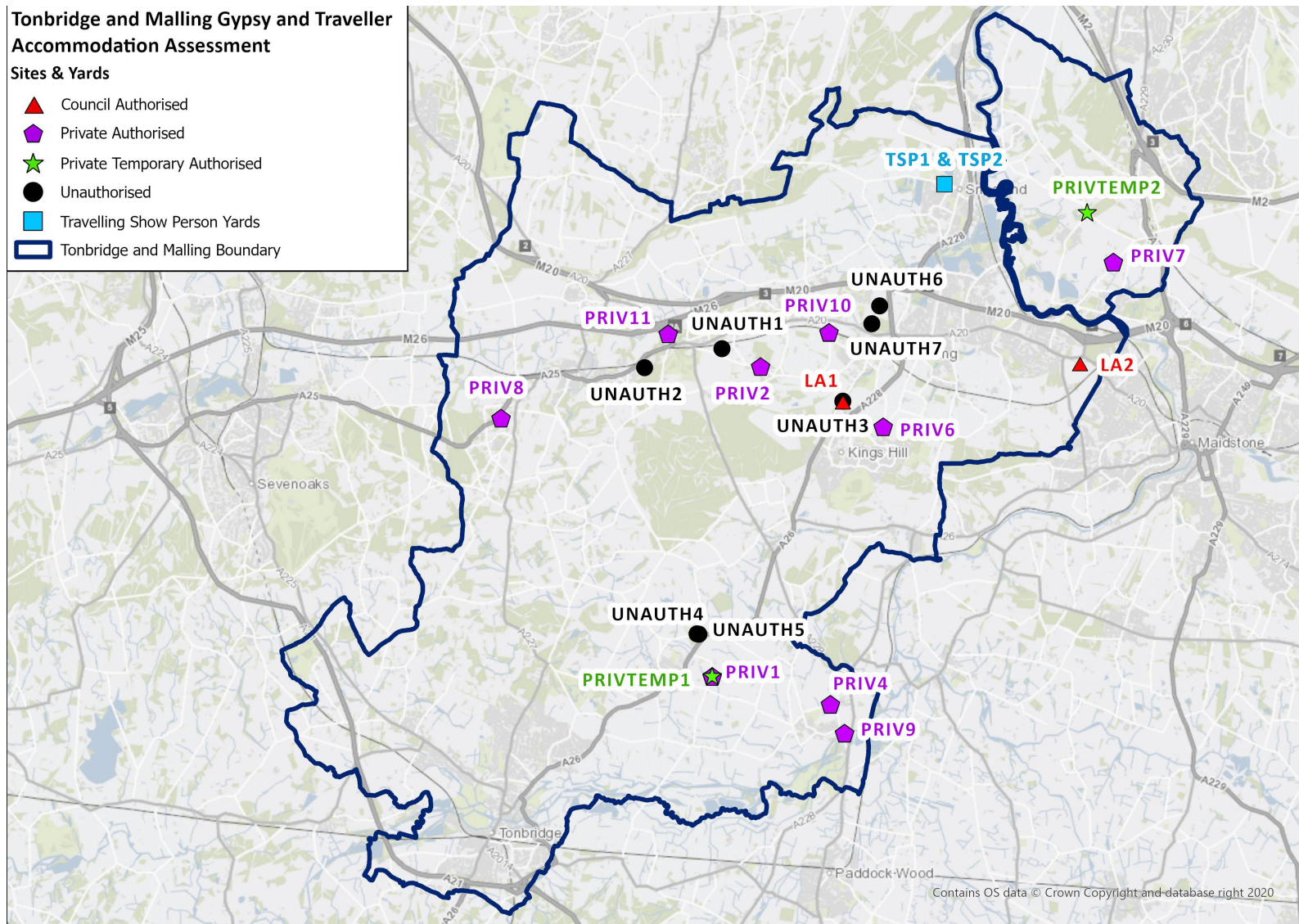
Priv4 76 Church Lane East Peckham TN12 5JH is now used as a residential caravan site

Priv5 from the 2021 GTAA no longer a site

Table 4.5 Summary of Travelling Showperson yards in Tonbridge and Malling

Yard Code	Address	Planning status	Total Plots	Total occupied plots	Total vacant plots	Total households	Interview 2025	2021 GTAA	Other data	Not available/ refused	Total household responses
TSP1	Redgates, Constitution Hill, Snodland ME6 5DJ	Private Authorised	2	2		2	2				2
TSP2	Greengates, Constitution Hill, Snodland ME6 5DJ	Private Authorised	2	2		2	2				2
TOTAL			4	4		4	4				4

Source: Council data 2025, site survey and fieldwork 2025

Map 4.1 Location of sites and yards in Tonbridge and Malling

5. Household survey findings and stakeholder summary

- 5.1 This chapter presents the findings of the household survey, which was carried out to provide primary data to inform this GTAA. The survey aimed to reach as many Gypsy and Traveller households living in the study area as possible. It was conducted using the questionnaire presented in Appendix A.

Gypsy and Traveller households living in Tonbridge and Malling

- 5.2 A review of the characteristics of Gypsy and Traveller households living in Tonbridge and Malling has been based on data from a total of 47 households on pitches obtained either through 2025 household survey data (37) or from 2021 survey data (10).
- 5.3 The number of responses achieved to particular questions is summarised for each question. It would not be appropriate to provide a detailed analysis of the survey information, for instance by type or location of site, as this has the potential to identify individual responses. Broad summaries of the household data are presented in a manner which maintains respondent confidentiality. Where analysis refers to 'small numbers' this means 4 or fewer households responding.
- 5.4 **Ethnicity** (base=46): Of household on pitches 74% identified as Irish Traveller and 26% identified as Romany Gypsy/English Traveller.
- 5.5 Data obtained provided an insight into household size, type and the age of residents living on pitches.
- 5.6 **Household size** (base=44): 18.2% of households were single person; 27.3% two person; 13.6% three person; 27.3% four person, 11.4% five person and 2.3% six person households.
- 5.7 **Household type** (base=44): 18.2% of households were single person, 15.9% couples, 29.5% couples with child(ren) including adult children, 25% were single parents, 18.2% were multi-adult households and 9.1% were extended families.
- 5.8 **Age profile:** The household survey (base=47 households) identified a total of 130 Gypsies and Travellers living on sites across Tonbridge and Malling of whom 86 were adults and 44 were children. Household survey data reports the following age profile (base=130) of the Travelling population in Tonbridge and Malling: 28.5% were aged 13 or under, 5.4% aged 14-17, 26.9% aged 18-34, 18.5% aged 35-49, 9.2% aged 50-64 and 11.5% aged 65 and over.
- 5.9 **Length of residence** (base=38): 23.7% had lived at their current place of residence for less than 5 years, 2.6% between 5 and less than 10 years, 34.2% between 10 and less than 20 years and 39.5% for 20 years or more.
- 5.10 **Overcrowding:** When asked if their home was overcrowded (base=35), 100% said no. When asked whether their pitch was overcrowded (base=35), 100%

said no. However, one household did say that the council should be more aware of allocating larger pitches for families on sites they own/manage.

Help and support needs

- 5.11 Respondents were asked if they had any broader help and support needs. A small number of respondents stated age-related problems, but no-one required specific assistance.

6. Gypsy and Traveller pitch, Travelling Showperson plot and transit site requirements

Introduction

- 6.1 This section reviews the overall pitch and plot requirements of Gypsies and Travellers and Travelling Showpeople across Tonbridge and Malling. It takes into account current supply and need, as well as future need, based on modelling of data. This chapter also considers transit pitch requirements for Gypsies and Travellers. Finally, the chapter presents planning policy recommendations.
- 6.2 The calculation of pitch requirements is based on modelling as advocated in **Gypsy and Traveller Accommodation Assessment Guidance** (DCLG, 2007). Although now formally withdrawn, the former DCLG Guidance still provides the best-practice approach towards the assessment of pitch and plot needs (see Chapter 2 for further discussion).
- 6.3 This approach requires an assessment of the current needs of Gypsies and Travellers and a projection of future needs. It advocates the use of a survey to supplement secondary source information and derive key supply and demand information. Modelling presents an overall need based on the revised 2024 PPTS definition which is also called the ‘cultural’ need.

Gypsy and Traveller pitch requirement model overview

- 6.4 Pitch need is assessed for two time periods. A short-term 5-year model looks at need over the next five years (2025/26 to 2029/30). A longer-term model looks at need over the longer-term (to 2041/42).
- 6.5 In terms of **need**, the 5-year model considers:
- the baseline number of households on all types of site (authorised, unauthorised and temporary authorised sites) as at August 2025;
 - existing households planning to move in the next five years (currently on sites and also from bricks and mortar) and where they are planning to move to; and
 - emerging households currently on sites and planning to emerge in the next five years and stay within the study area on a pitch; to derive a figure for total pitch need.
- 6.6 In terms of **supply**, the model considers:
- total supply of current pitches on authorised sites; and
 - vacant pitches on authorised sites.
- 6.7 The model then reconciles total need and existing authorised supply over the next five years by summarising:
- total need for pitches; and
 - total supply of authorised pitches.

- 6.8 The longer-term model then considers the cultural need over the period to 2041/42. This is based on the age profile of children under 13 living in Gypsy and Traveller households on pitches.

Gypsy and Traveller pitch need analysis: Description of factors in the 5-year need model: Tonbridge and Malling

- 6.9 Table 6.1 provides a summary of the 5-year pitch need calculation for Tonbridge and Malling. Each component in the model is now discussed to ensure that the process is transparent and any assumptions clearly stated.

Need

Current households living on pitches (1a to 1e)

- 6.10 These figures are derived from Council data and site observation data. In summary there are 50 households in total living on sites, with 39 households living on authorised sites, 3 on private temporary authorised and 8 households living on unauthorised sites.

Current households in bricks and mortar accommodation (2)

- 6.11 The 2021 Census suggested there were 116 households living in bricks and mortar accommodation.

Weighting

- 6.12 Survey data have been weighted to take account of non-response households. The weighting is 50 (total households) divided by 47 (total responses) = 1.064.

Existing households planning to move in the next five years (3)

- 6.13 This was derived from information from the 2025 household survey for respondents currently on pitches.
- 6.14 Of existing households currently on sites, the household survey indicates that 1 household plans to move in the next 5 years (rows 3a, 3b and 3c). Overall, this move has no impact on need.
- 6.15 For households currently in bricks and mortar, based on national arc⁴ studies it is estimated that 5.3% of households living in bricks and mortar would prefer to live on a site which would equate to around six households. The household survey has specifically identified two households wanting to move to a site from bricks and mortar and this figure is used in modelling.
- 6.16 Regarding in-migration, the household survey identified 1 household that had moved onto a pitch in the past 5 years, and this is used in the model as an indicator of in-migration in the next 5 years.
- 6.17 The factors presented in section 3 of the model result in an overall net requirement of +3 pitches from existing households planning to move in the next 5 years.

Emerging households (4)

- 6.18 This is the number of households expected to emerge in the next 5 years based on 2025 household survey information. The total number is +24. If of this number +23 want to move onto a site and +1 plans to move to bricks and mortar. Therefore, the net need for pitches from emerging households is +23. If young people aged 18 and over were living with family and have not specified that they want to form a new household, this is assumed to be through choice, and the model does not assume they want to form a new household.

Total need for pitches (5)

- 6.19 This is a total of current households on authorised and unauthorised pitches, households on pitches and in bricks and mortar planning to move in the next five years and demand from emerging households from pitches and bricks and mortar accommodation. This indicates a total need for 78 pitches.

Supply**Current supply of authorised pitches (6)**

- 6.20 Modelling assumes a total supply of authorised pitches to meet the needs of 66 households. This is broken down to a total of 49 occupied Gypsy and Traveller pitches and 17 vacant pitches.

Reconciling supply and demand

- 6.21 There is a total need over the next five years (2025/26 to 2029/30) for 78 pitches in Tonbridge and Malling (Table 6.1) compared with a supply of 66 authorised pitches. The result is an overall need for 12 additional pitches.

Table 6.1 Summary of demand and supply factors: Gypsies and Travellers – Tonbridge and Malling 2025/26 to 2029/30/30

CULTURAL NEED			Tonbridge and Malling Total
1	Households living on pitches (includes households doubled up on pitches)	1a. On council site	26
		1b. On private site - Authorised	13
		1c. On private site – Temporary Authorised	3
		1d. On unauthorised site	8
		1e. Total (1a to 1d)	50
2	Estimate of households living in bricks and mortar accommodation	2021 Census estimate	116
		WEIGHTING	1.085
3	Existing households planning to move in next 5 years or on unauthorised site	Currently on sites	
		3a. To another pitch/same site (no net impact)	1
		3b. To another site in LA (no net impact)	0
		3c. From site to bricks and mortar (-)	0
		3d. To site/bricks and mortar outside district	0
		Currently in Bricks and Mortar	
		3e. Planning to move to a site in LA (+)	2
		3f. Planning to move to another B&M property (no net impact)	0
		Roadside in TMBC	
		3g. Currently on roadside (+)	0
		In-migrant households	
		3h. Allowance for in-migration (+)	1
3i. TOTAL Net impact (-3c-3d+3e+3g+3h)		3	
4	Emerging households (5 years)	4a. Currently on site and planning to live on current site	20
		4b. Current on site and planning to live on another site in the district	3
		4c. Currently on site and planning to live outside the district	0
		4d. Currently in B&M planning to move to a site in LA (+)	0
		4e. Currently in B&M and moving to B&M (no net impact)	0
		4f. Currently on Site and moving to B&M (no net impact)	1
		4g. TOTAL (4a+4b+4d)	23
5	Total Need	1e+3i+4g	76
SUPPLY			
6	Current supply of authorised pitches	6a Current supply of occupied permanently authorised pitches	47
		6b. Current authorised pitches which are vacant	17
		6c. Total current authorised supply (6a+6b)	64
RECONCILING NEED AND SUPPLY			
7	Total need for pitches	5 years (from 5)	76
8	Total supply of authorised pitches	5 years (from 6c)	64
5 YEAR AUTHORISED PITCH SHORTFALL 2025/26 TO 2029/30			12

Longer-term pitch requirement modelling to 2041/42

- 6.22 Longer-term pitch need modelling has been carried out using known household structure information from the household survey of households living on pitches. Based on the age of children in households, it is possible to determine the extent of 'likely emergence', which assumes that a child is likely to form a new household at the age of 18.
- 6.23 When calculating longer-term need, a reasonable assumption is that half of these children will form new households, bearing in mind culturally women tend to move away on marriage and men tend to stay in close proximity to their families on marriage. The model therefore assumes that 50% of children will form households when they reach 18 and that these households remain in the local authority area. This approach has been tested at Inquiry, and the assumption has been corroborated by several Traveler interviewees. Demographic data are currently available to 2041/42. Over this period, there is a need for an additional 21 pitches (Table 6.2).

Table 6.2 Future pitch requirements based on the assumption that 50% of children will require a pitch in Tonbridge and Malling

Time period	No. children	No. pitches
2030/31 to 2034/35 (5 years)	12	6
2035/36 to 2039/40 (5 years)	18	9
2040/41 to 2041/42 (2 years)	12	6
Total (2030/31 to 2041/42) (12 years)	42	21

Overall pitch need

- 6.24 Table 6.3 summarises the overall need for pitches across Tonbridge and Malling over the period 2025/26 to 2041/42. Need has been assessed over short-term 2025/26 to 2029/30 and long-term 2030/31 to 2041/42 periods. The overall need is 33 additional pitches. The main driver of need in the first five years is households living on unauthorised sites and emerging households. Longer-term need takes into account the demographic profile of people living on sites.

Table 6.3 Plan period Gypsy and Traveller pitch need 2025/26 to 2041/42 – Tonbridge and Malling

Residential pitch need	Additional pitch need
5yr Authorised Pitch Shortfall (2025/26 to 2029/30) (A)	12
Longer-term need	
Over period 2030/31 to 2034/35 (B)	6
Over period 2035/36 to 2039/40 (C)	9
Over period 2040/41 to 2041/42 (D)	6
Longer-term TOTAL to 2041/41 (12 years) E=(B+C+D)	21
NET SHORTFALL 2025/26 to 2041/52 (A+E) (17 years)	33
Annual net shortfall	1.9

Potential capacity for Gypsy and Traveller pitches on existing sites

6.25 There are several potential sources of pitch supply that are summarised in Table 6.4.

Table 6.4 Gypsy and Traveller pitch need: potential sources of pitch supply

1. Regularisation of temporary authorised private site	Pitches on sites that are temporary authorised	3 across 2 sites	Potential for regularisation
2. Regularisation of unauthorised pitches	Pitches on sites that are unauthorised	15 across 7 sites	Potential for regularisation
3. Potential household dissolution	All on public pitches	9	Potential pitches coming available over the plan period owing to the current age of occupants.
4. Turnover/relets on council pitches	5 pitches have become available and occupied in the past 5 years. Notable level of vacancy on Coldharbour Lane	Assume turnover/ reletting of 1 pitch each year	Some potential supply is assumed through turnover/reletting

6.26 Each of these options is now discussed in further detail.

Regularisation

6.27 Regularisation of sites that are not permanently authorised would help meet the needs identified. There are 2 Temporary Authorised sites with 3 pitches and 7 unauthorised sites with 15 pitches unauthorised sites in Tonbridge and Malling. These could be considered for regularisation if they satisfy relevant Local Plan policies. This would create **18 authorised pitches**.

Household dissolution

6.28 Analysis also considers in a sensitive manner the potential for pitches to come available through the dissolution of households. Based on the age profile and household composition on pitches, a potential of **9 pitches** could become available over the period to 2041/42.

Turnover on sites

6.29 Turnover relates to the number of pitches that are expected to become available for occupancy. Analysis only includes expected turnover on public sites as this is referenced in (former) CLG guidance and more accurate data on changes in pitch occupancy is likely to be available. Although there is likely to

be turnover on private sites, the ability of households to move onto private sites may be more restrictive (for instance the site may be restricted to a particular family) and less likely to be recorded. Five households have moved onto council pitches in the past 5 years which indicates that turnover/reletting is taking place. Turnover therefore has the potential to provide pitches to meet need and some supply of pitches over the plan period is anticipated.

Summary of need and capacity

- 6.30 Overall, there is a need across Tonbridge and Malling for 33 additional authorised pitches over the period 2025/26 to 2041/42. There is a need for 12 additional pitches in the first five years 2025/26 to 2029/30, driven mainly by unauthorised sites and emerging household and 21 additional pitches in the longer-term 2030/31 to 2041/42 through emerging household need.
- 6.31 There is a potential supply of additional authorised pitches through:
 - 1. Potential regularisation of existing pitches on sites that are not permanently authorised i.e. temporary authorised sites (18 pitches)
 - 2. Potential intensification of existing permanent authorised sites (26 pitches)
- 6.32 Should all the above be pursued, there is a potential supply of 44 (excluding turnover of existing pitches) which would more than meet the minimum identified need over the plan period. Additionally, it may be possible to expand/intensify temporary authorised sites (4 pitches). Some turnover/reletting on social rented pitches, which has been estimated at 9 over the plan period, is also anticipated. Planning policies which support 1 and 2 above would be more than sufficient to meet identified needs over the plan period. There is also a potential for 9 pitches to become available through household dissolution over the plan period.

Alternative need analysis based on annual growth rates

- 6.33 Table 6.5 sets out the projected number of households using growth rates of between 1.5% and 3.5% each year. The rate of 3.0% represents the anticipated growth rate based on the pitch need modelling. Higher growth rates can be associated with youthful populations and emerging need will be a key driver of pitch need over the period 2025/26 to 2041/42.
- 6.34 Modelling of household dissolution indicates a potential loss of 9 household reference people over the period 2025/26 to 2041/42, representing an annualised dissolution rate of 0.7%. This would imply a net overall household growth rate of around 2.3%.
- 6.35 The main conclusion is that the youthful population living on pitches in Tonbridge and Malling is a key driver of future pitch need. Some household dissolution is anticipated. The scale of pitch need identified is consistent with a gross growth rate of 3.3% each year which would be reduced to around 2.3% when household dissolution is considered.

Table 6.5 Annual household growth rate analysis

	Annual Gross Household Growth Rate				
	1.5%	2.5%	3.0%	3.3%	3.5%
2025 base no. households	51	51	51	51	51
2026	50.8	51.3	51.5	51.7	51.8
2027	51.5	52.5	53.0	53.4	53.6
2028	52.3	53.8	54.6	55.2	55.4
2029	53.1	55.2	56.3	57.0	57.4
2030	53.9	56.6	58.0	58.9	59.4
2031	54.7	58.0	59.7	60.9	61.5
2032	55.5	59.4	61.5	62.9	63.6
2033	56.3	60.9	63.3	65.0	65.8
2034	57.2	62.4	65.2	67.1	68.1
2035	58.0	64.0	67.2	69.4	70.5
2036	58.9	65.6	69.2	71.7	73.0
2037	59.8	67.2	71.3	74.1	75.6
2038	60.7	68.9	73.4	76.5	78.2
2039	61.6	70.6	75.6	79.1	80.9
2040	62.5	72.4	77.9	81.7	83.8
2041	63.4	74.2	80.2	84.4	86.7
2042	64.4	76.1	82.6	87.3	89.7

Tenure preferences

- 6.36 Existing households planning to move and new households expecting to form were asked about tenure preferences.
- 6.37 Based on the tenure preferences of existing and emerging households (number of tenure preferences stated = 19), 58% stated a preference for a social rented pitch and 42% a pitch on a private site. This was based on specific preferences expressed or if no tenure was specified the current tenure of pitches occupied.

Transit requirements

- 6.38 There are a number of ways to deliver temporary places where Travellers can stop whilst passing through a local authority area. These include transit sites, stop over areas and negotiated stopping. A good indicator of transit need is unauthorised encampment activity.
- 6.39 For Tonbridge and Malling, there were 7 incidences of unauthorised encampment activity reported between 2021 and 2025 (Table 6.6).

Table 6.6 **Unauthorised encampment activity in Tonbridge and Malling**

Year	Number of encampments recorded
2021	1
2022	3
2023	1
2024	1
2025	1

Source: Council monitoring data

- 6.40 The findings from the 2021 study regarding Transit need remain appropriate. These indicated a limited need for transit provision which was reflected in the 2025 household survey.
- 6.41 When considering transit need, the Council needs to be mindful of the 2022 Police, Crime, Courts and Sentencing Act (Part 4). This makes using land for stopping without permission a criminal offence rather than a civil offence. The Bill gives police increased powers to act and introduces significant penalties (fines up to £2,500, impounding vehicles and prison sentences).
- 6.42 Although the level unauthorised encampment activity is low and only a minority of household survey respondents indicate there is a need for transit provision, it is recommended that the Council introduces negotiated stopping arrangements to support any future transit need. This is an important consideration given the potential criminalisation of stopping on land legislated for in the Police, Crime, Sentencing and Courts Act 2022.
- 6.43 Negotiated stopping developed by Leeds GATE ([click here for link to model](#)) involves Councils making an agreement with Gypsies and Travellers on unauthorised encampments. The terms of the agreement can vary but usually include the provision of portaloos, waste disposal, water; the length of the agreement can vary but tends to be around 28 days; and users agree to comply with rules for behaviour and use of the site. Developing a negotiated stopping policy is a recommended policy response for the Council.

Travelling Showperson residential plot requirements

- 6.44 There are currently two Travelling Showperson yards in Tonbridge and Malling which are used for residential purposes and storage of equipment, these are occupied by one extended family group. Discussions indicate there is currently sufficient capacity to accommodate residential needs.
- 6.45 However, there is a national strategic need for Showperson yards to accommodate residential plots. It is therefore recommended that a criteria-based policy is developed through which any applications over the plan period can be considered.
- 6.46 Through discussions with several Travelling Showpeople who have developed yards, a recommended minimum size for a yard on 0.15ha which could accommodate up to 3 caravans (or 3 plots) and ideally 0.2ha which could accommodate up to 5 caravans (or 5 plots).

7. Conclusion and response

- 7.1 This concluding chapter provides a summary of key findings and recommendations.

Current accommodation

- 7.2 There are well-established Gypsy and Traveller communities living across Tonbridge and Malling. There are currently 2 authorised Council sites (40 pitches), 10 private sites (26 pitches), 2 private temporary sites (3 pitches) and 6 unauthorised sites (14 pitches). Household survey data was obtained for 130 people in 47 households living on pitches including 86 adults and 44 children.
- 7.3 There are currently two Travelling Showperson yards in Tonbridge and Malling accommodating 6 members of one extended family.

Future Gypsy and Traveller residential need

- 7.4 There is an overall minimum need for 33 additional Gypsy and Traveller pitches across Tonbridge and Malling over the period 2025/26 to 2041/42. Of this need, 12 pitches are needed in the first five years and 21 over the longer-term period 2030/31 to 2041/42.
- 7.5 Needs analysis considers the needs arising from existing households, households on unauthorised sites, newly forming households, in-migrant households and current vacancies on existing sites. The main drivers of need across Tonbridge and Malling are from households currently living on sites that are not permanently authorised and household formation from households already on pitches. The annual net shortfall need is 2.17 pitches.
- 7.6 The need in the first five years 2025/26 to 2029/30 is:
- households living on pitches = 50
 - Existing households needing a pitch = 3
 - Emerging households needing a pitch = 23
 - Total need = 76
 - Total authorised supply = 64
 - Net shortfall 2025/26 to 2029/30 (76 need – 64 authorised supply) = **12 pitches**
- 7.7 The need over the **longer-term** 2030/31 to 2041/42 is based on the demographics of people living on sites. There is a total of 42 people currently aged under the age of 13 who are expected to need a pitch during the period 2030/31 to 2042/43. Assuming that 50% form households, the pitch need is **21 pitches**.
- 7.8 The total need over the 17-year period 2025/26 to 2041/42 is **33 pitches** or 1.94 each year.

- 7.9 To meet its need for pitches, the Council is recommended to consider regularising sites that are not permanently authorised along with intensifying and expanding existing authorised sites where possible. In addition, the Council should acknowledge there is likely to be some household dissolution which could result in existing pitches becoming available, therefore resulting in turnover / reletting of pitches on Council owned sites.
- 7.10 It is recommended that supply of additional authorised pitches over the plan period is achieved by:
1. Regularisation of existing pitches on sites that are not permanently authorised (18 pitches estimate subject to detailed site assessments).
 2. Intensification of existing permanent authorised sites (26 pitches estimate subject to detailed site assessments).
- 7.11 This would provide a potential supply of 44 pitches which would more than meet the minimum need of 33 pitches identified in this GTAA. Appropriately permissive planning policies should therefore be included in the Council's emerging Local Plan, to support the identified sources of pitch supply in coming forward. Applications for all suitable sites may not be submitted during the plan period to 2042, however there is a buffer of 10 pitches in the identified supply which provides flexibility.
- 7.12 Site assessment work has been undertaken and is currently being reviewing alongside the assessment of potential sites promoted through the Council's Local Plan process. It is anticipated that this work will be finalised for publication at Reg19 stage.
- 7.13 Analysis has also considered annual growth rates. The scale of need evidenced is equivalent to an annual growth rate of 3.0%. Although this is high, it reflects the youthful population living on sites. The household dissolution rate is estimated to be 0.7% annually, resulting in a net annual growth rate of around 2.3%.
- 7.14 Notwithstanding evidence in this GTAA on need, additional need may arise over the plan period, for instance households moving into Tonbridge and Malling. It is therefore recommended that the Local Plan references the need in the GTAA as a minimum which is likely to be met, and sets out criteria-based policies to inform all future planning Gypsy and Traveller applications.

Transit provision

- 7.15 When considering transit need, the Council needs to be mindful of proposed new legislation through the Police, Crime, Courts and Sentencing Act (Part 4). This will make using land for stopping without permission a criminal offence rather than a civil offence. The Act gives police increased powers to act and introduces significant penalties (fines up to £2,500, impounding vehicles and prison sentences).
- 7.16 Although the level unauthorised encampment activity is low and only a minority of household survey respondents in 2021 and 2025 indicate there is a need for transit provision, it is recommended that the Council introduces negotiated

stopping arrangements to support any future transit need. This is an important consideration given the potential criminalisation of stopping on land legislated for in the Police, Crime, Sentencing and Courts Act 2022.

- 7.17 Negotiated stopping involves Councils making an agreement with Gypsies and Travellers on unauthorised encampments. The terms of the agreement can vary but usually include the provision of portaloos, waste disposal, water; the length of the agreement can vary but tends to be around 28 days; and users agree to comply with rules for behaviour and use of the site. Developing a negotiated stopping policy is a recommended policy response for the Council.

Future Travelling Showperson residential need

- 7.18 There are currently two Travelling Showperson's yards in Tonbridge and Malling. Updated information on the occupants on the two yards have been obtained and confirm there is currently no additional need for residential plots. However, the Council should have a criteria-based policy in place should any additional need arise over the plan period.

Future updating

- 7.19 The GTAA should be updated on a 5-yearly basis to ensure that the level of pitch, plot and mooring provision remains appropriate for the Gypsy, Traveller and Travelling Showperson populations across Tonbridge and Malling.

Appendix A: Gypsy and Traveller Fieldwork Questionnaire

Date and Time	
Site Reference	
Address	
General Data Protection Regulation (2018) and Data Protection	GDPR came into effect from 25th May 2018. This provides rights of people to control personal data held about them by organisations. This study is being done for Tonbridge and Malling Borough Council to identify if there is a need for more residential pitches and transit provision in the area. A report will be prepared based on the findings of these surveys. The information you provide will not be used for any other purpose.
Can you please say if you are happy to carry on with the questionnaire on this basis?	Yes No

1	Pitch/Property Type (and tenure if B&M)	
2	No. statics/mobiles/chalets or bricks and mortar	
3A	No. tourers/caravans	
3B	No. of amenity blocks	
4	Description of pitch occupancy	
5	No. households	
6	No. concealed households	
7	No. doubled up households	
8	Does anyone else use this pitch as their home? If so, who	

9	HOUSEHOLD CHARACTERISTICS			
		Gender	Age	Relationship to respondent
	Respondent			
	Person2			
	Person 3			
	Person 4			
	Person 5			
	Person 6			
	Person 7			
	Person 8			

10	ETHNICITY	
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11	How many bedspaces are there on your pitch?	
12	Overcrowding of home	Y / N
13	Overcrowding of pitch	Y / N
14	Thinking back to when you were 15, were you living on a site, on the roadside or living in bricks and mortar housing?	S, R, B&M
15	Where were you living? Record district/settlement name	

	TRAVELLING QUESTIONS	
16	In the last year have you or someone in your household travelled?	Y / N
17	If yes, reason(s) for travelling	
18	If yes, please describe when and where do you travel? (if relevant)	
19	If no, what reasons do you or your household have for not travelling now or in the future?	

	WHERE YOU PLAN TO LIVE IN THE FUTURE	
20	Are you planning to move to another place to live in the next 5 years?	Y / N
21	Why are you planning to move?	
22	Where are you planning to move to? (Same Site, Private Site in District, Council Site in District, Outside District (if so where), Bricks and Mortar housing)	
23	What type of dwelling? (caravan, trailer, chalet, house, flat, bungalow)	
24A	If pitch, single (one static) or double pitch (for two statics/family pitch)	
24B	Would you need any grazing land for any livestock?	Y / N
24C	If you are considering bricks and mortar, what are your reasons	

	IF IN B&M HOUSING	
25	If you live in bricks and mortar housing, are you happy to live here or would you prefer to live on a pitch?	Happy Here / Prefer pitch
26	If you would prefer to live on a pitch is this because you have a 'cultural aversion' to living in bricks and mortar (this means if affects your mental health and makes you unhappy/depressed)?	Y / N

	EMERGING HOUSEHOLDS	
27	Emerging households: Are there any people in your household who want to move to their own pitch in the next 5 yrs?	Y / N

		HH1	HH2	HH3	HH4
28	Where are you planning to move to? (Same Site, Private Site in District, Council Site in District, Outside District (if so where), Bricks and Mortar housing)				
29	What type of dwelling? (caravan, trailer, chalet, house, flat, bungalow)				
30	If pitch, single (one static) or double pitch (for two statics)				
31	If living in bricks and mortar, do you have a 'cultural aversion' to living in bricks and mortar? (this means if affects your mental health and makes you unhappy/ depressed)	Y / N	Y / N	Y / N	Y / N

	ADDITIONAL RESIDENTIAL PITCHES	
32	Scope to expand site (extend the boundary of the site)	Y / N
33	No. additional pitches	
34	Scope to intensify pitches (put more pitches on the existing site)	Y / N
35	No. additional pitches	
36	Are there any vacant pitches on the site which could be used by another family? If so, how many pitches	
37	In general, is there a need for more authorised pitches (for people to live on all the time?) in this part of B81 Shropshire?	Y / N
38	If so, now many are needed?	
39	Who should own them (Council, people from the Traveller Community, non-Travellers)	
40	Do you own any land or know of anywhere within the district which could be considered for development as a site?	

	TRANSIT AND TEMPORARY STOPOVER NEED	
41	Is there a need to provide places where people can stop whilst travelling through the district? This can include transit pitches or stopover places	Y / N
42	Is there a need for transit pitches (for people stopping over temporarily) in the district? A transit pitch is intended for short-term use and usually includes space for two caravans, parking space and access to electricity, a toilet, washing facilities	Y / N
43	If so, how many are needed?	
44	Who should manage them? (Council, Traveller Community)	
45	Where should they be located?	

46	Is there a need for stopover places? A stopover place is land which can be used on a temporary basis and usually include access to portaloos, waste disposal and water	Y / N
47	If so, how many are needed?	
48	Who should manage them? (Council, Traveller Community)	
49	Where should they be located?	

	RESIDENTIAL HISTORY	
50	How many years have you lived here? <u>Please state number of years</u>	
Routing	If more than five years	Go to Q56
	If five years or less	Go to Q51
51	Where did you move from? (District)	
52	Were you living on a Private Site, Council Site, Roadside or Bricks and Mortar housing?	
53	When you moved here, was the pitch vacant, a brand-new pitch or had the pitch been created by dividing up an existing pitch?	
54	What were the reasons for moving here?	
55	Did you already have a connection with the area? (e.g. family or friends living here; or you used to live here?)	

	SUPPORT NEEDS	
56	Do you or a member of your household have any health-related needs? Could you please explain what they are?	

	FINAL QUESTIONS	
57	Is there anything else you'd like to tell us about your housing or support needs?	
58	Do you know anyone in bricks and mortar housing looking to live on a pitch? If so, can you provide contact details	

OTHER COMMENTS

Appendix B: Glossary of terms

Bargee Travellers: Itinerant boat dwellers on Britain's inland and coastal waterways. This includes anyone whose home is a boat and who does not have a permanent mooring for their boat with planning permission for residential use

Caravans: Mobile living vehicles used by Gypsies and Travellers; also referred to as trailers.

CJ&POA: Criminal Justice and Public Order Act 1994; includes powers for local authorities and police to act against unauthorised encampments.

CRE: Commission for Racial Equality.

Duty to cooperate: introduced in the Localism Act 2011 and is set out in section 33A of the Planning and Compulsory Purchase Act 2004. It placed a legal duty on local planning authorities in England to engage constructive, actively and on an ongoing basis with prescribed bodies on the preparation of a Local Plan. The Duty, as a legal test, has now been rescinded by the Levelling Up and Regeneration Act, which received Royal Assent on 26 October 2023. This has replaced the legal test with a soundness test (in national policy). The Levelling-up and Regeneration Act 2023 will revoke the Duty to Cooperate in relation to the reformed plan making system. However, the Duty remains a legal requirement under the current Local Plans system and will continue to apply to Local Plans progressed within the current system.

Gypsies and Travellers: Defined in MHCLG *Planning policy for traveller sites 2024* annex 1 as “Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, and all other persons with a cultural tradition of nomadism or of living in a caravan, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.”

Irish Traveller: Member of one of the main groups of Gypsies and Travellers in England. Irish Travellers have a distinct indigenous origin in Ireland and have been in England since the mid nineteenth century. They have been recognised as an ethnic group since August 2000 in England and Wales (O'Leary v Allied Domecq).

MHCLG: Ministry of Communities, Housing and Local Government. Previously renamed DLUHC Department for Levelling Up, Housing and Communities in 2021 from the MHCLG in 2018. The ministry has oversight of policies to meet the needs Gypsies and Travellers in England.

Mobile home: Legally a 'caravan' but not usually capable of being moved by towing.

Negotiated Stopping: involves Local Authority officers making an agreement with Gypsies and Travellers on unauthorised encampments. The agreement allows Travellers to stay either on the land they are camped on or move to a bit of land more suitable for all parties. The length of the agreement can also vary from 2 weeks to several months but tend to be around 28 days. The agreement is a local one and will vary but has so far included Travellers agreeing to leave sites clean and not make too much noise and the Local Authority providing waste disposal and toilets, sometimes showers and water too. See www.negotiatedstopping.co.uk for more information.

Pitch: Area of land on a Gypsy/Traveller site occupied by one resident family; sometimes referred to as a plot, especially when referring to Travelling Showpeople.

MHCLG *Planning policy for traveller sites* (December 2024) states that “For the purposes of this planning policy, “pitch” means a pitch on a “gypsy and traveller” site and “plot” means a pitch on a “travelling showpeople” site (often called a “yard”). This terminology differentiates between residential pitches for “gypsies and travellers” and mixed-use plots for “travelling showpeople”, which may / will need to incorporate space or to be split to allow for the storage of equipment”.

Plot: see pitch

PPTS: Planning Policy for Traveller Sites (DCLG, 2012 and 2015 editions, amended 2023 with latest edition published by MHCLG December 2024).

Roadside: Term used here to indicate families on unauthorised encampments, whether literally on the roadside or on other locations such as fields, car parks or other open spaces.

Roma: Migrant populations from Central and Eastern Europe that have arrived in the UK in the last half-century. It is an umbrella term used to describe sub-groups including Sinti, Lovari, Erldes and others.

Romany: Member of one of the main groups of Gypsies and Travellers in England. Romany Gypsies trace their ethnic origin back to migrations, probably from India, taking place at intervals since before 1500. Gypsies have been a recognised ethnic group for the purposes of British race relations legislation since 1988 (CRE V Dutton).

Sheds: On most residential Gypsy/Traveller sites 'shed' refers to a small basic building with plumbing amenities (bath/shower, WC, sink), which are provided at the rate of one per pitch/plot. Some contain a cooker and basic kitchen facilities.

Showpeople: Defined in MHCLG *Planning policy for traveller sites* (December 2024) as “Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family’s or dependants’ more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above”.

Site (Gypsy and Traveller): An area of land laid out and used for Gypsy/Traveller caravans; often though not always comprising slabs and amenity blocks or ‘sheds’. An authorised site will have planning permission. An unauthorised development lacks planning permission.

Slab: An area of concrete or tarmac on sites allocated to a household for the parking of trailers (caravans)

Stopping places/stopover sites: A term used to denote an unauthorised temporary camping area tolerated by local authorities, used by Gypsies and Travellers for short-term encampments, and sometimes with the provision of temporary toilet facilities, water supplies and refuse collection services.

Tolerated site: An unauthorised encampment/site where a local authority has decided not to take enforcement action to seek its removal.

Trailers: Term used for mobile living vehicles used by Gypsies and Travellers; also referred to as caravans.

Transit site: A site intended for short-term use while in transit. The site is usually permanent and authorised, but there is a limit on the length of time residents can stay.

Unauthorised development: Establishment of Gypsy and Traveller sites without planning permission, usually on land owned by those establishing the site. Unauthorised development may involve ground works for roadways and hard standings. People parking caravans on their own land without planning permission are not Unauthorised Encampments in that they cannot trespass on their own land – they are therefore Unauthorised Developments, and enforcement is always dealt with by local planning authorities enforcing planning legislation.

Unauthorised encampment: Land where Gypsies or Travellers reside in vehicles or tents without permission. Unauthorised encampments can occur in a variety of locations (roadside, car parks, parks, fields, etc.) and constitute trespass. The 1994 Criminal Justice and Public Order Act made it a criminal offence to camp on land without the owner's consent. Unauthorised encampments fall into two main categories: those on land owned by local authorities and those on privately owned land. It is up to the landowner to take enforcement action in conjunction with the police.

Wagons: This is the preferred term for the vehicles used for accommodation by Showpeople.

Yards: Showpeople travel in connection with their work and therefore live, almost universally, in wagons. During the winter months these are parked up in what was traditionally known as 'winter quarters'. These 'yards' are now often occupied all year around by some family members.