

Tunbridge Wells Borough Council

Five-Year Gypsy and Traveller Pitch Supply Statement 2024

September 2024

Position as at 1 April 2024



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Introduction

1. The [Planning Policy for Traveller Sites](#) (PPTS) 2015, in conjunction with the [National Planning Policy Framework](#) (NPPF) 2023, requires Local Planning Authorities to identify and annually update specific deliverable sites suitable for Gypsies and Traveller pitches.
2. The previous iterations of this document identified the need for new Gypsy and Traveller pitches in the borough informed by the 2018 [Gypsy and Traveller Accommodation Assessment](#) (GTAA), which had provided the basis for determining pitch requirements to be met through the emerging Local Plan. However, a revised GTAA (2024) has now been prepared which updates the assessment of need within the borough for the period from 2024-2039. This revised GTAA supersedes the previous GTAA and now takes account of the revised definition of Gypsies and Travellers within the PPTS which was updated in December 2023.
3. This Statement provides a summary of the current level of need for new pitches and the five-year supply position of deliverable Gypsy and Traveller sites within Tunbridge Wells Borough for the five-year period from 1 April 2024 to 31 March 2029. It will be used to inform the consideration of planning decisions relating to Gypsy and Traveller sites/pitches.

Need for Pitches

4. As noted above, the present and future need for Gypsy and Traveller accommodation is calculated and presented within the revised GTAA (2024). This revised GTAA identifies the level of need between 1 April 2024 – 31 March 2039. This position also takes account of any previous under-supply.
5. **Table 1** indicates the total level of need for Gypsy and Traveller pitches within the borough as identified within the 2024 GTAA. It is noted that the GTAA provides two need figures: one based on the ethnic identity definition, and one based on the PPTS 2023 definition. The ethnic definition includes all Gypsies and Travellers regardless of whether they have ceased to travel or not, and the PPTS definition includes Gypsies and Travellers who have permanently or temporarily ceased to travel due to their own or their family’s or dependants’ educational or health needs or old age.
6. While the GTAA recommends adopting the ethnic definition, the GTAA accepts that the Local Planning Authority may adopt the PPTS 2023 definition (with the balance of ethnic need being an additional need that the Council may choose to meet), i.e., the remaining ethnic need could be subject to a criteria-based windfall policy (which, of course, would be subject to all other relevant material considerations). Thus, it is noted that adopting the ethnic need is not mandatory, and the GTAA accepts that it is for Local Planning Authorities to decide individually which approach to take for planning purposes (but to be kept under review in light of evolving appeal decisions and case law).
7. Given that the emerging Local Plan (2020-2038) proposes to include a criteria-based windfall policy (that will also apply to proposed allocations), it considers that adopting the PPTS definition for Plan-making purposes (i.e., seeking to meet the PPTS definition through existing supply and proposed allocations) is most appropriate, but that any further (windfall) applications will be assessed in light of the balance of ethnic need. For completeness however, the assessment of both ethnic and PPTS need figures are covered within this Statement.

Table 1 - Gypsy and Traveller Pitch Needs Between 1 April 2024 and 31 March 2039

Period (1 April to 31 March)	Pitch Need (Ethnic)	Pitch Need (PPTS 2023)	Transit Site Plots
2024 - 2029	37	29	0
2029 - 2034	8	8	0
2034 - 2039	9	8	0
Total 2024 - 2039	54	45	0

8. **Table 1** therefore indicates that there is a need for 54 pitches under the ethnic definition, and 45 pitches under the PPTS (2023) definition to the end of the

assessed period (31 March 2039). The need within the five-year period subject to this Statement is 37 pitches under the ethnic definition, and 29 pitches under the PPTS definition. There is no identified need for transit site plots. The emerging Plan period runs to 2038, and thus the need to 31 March 2038 would equate to 52 pitches under the ethnic definition, and 43 pitches under the PPTS definition (rounded to the nearest whole number). To the end of the 10-year supply period proposed in the emerging Plan (i.e., to 31 March 2035), the need would be 47 pitches under the ethnic definition, and 39 pitches under the PPTS definition (rounded to the nearest whole number). The yearly averages are broken down in **Table 2**.

Table 2 - Gypsy and Traveller Pitch Needs Between 1 April 2024 and 31 March 2039 (Yearly Breakdown)

Period (1 April to 31 March)	Pitch Need (Ethnic)	Pitch Need (PPTS 2023)	Transit Site Plots
2024 – 2025	7.4	5.8	0
2025 – 2026	7.4	5.8	0
2026 – 2027	7.4	5.8	0
2027 – 2028	7.4	5.8	0
2028 – 2029	7.4	5.8	0
2029 – 2030	1.6	1.6	0
2030 – 2031	1.6	1.6	0
2031 – 2032	1.6	1.6	0
2032 – 2033	1.6	1.6	0
2033 – 2034	1.6	1.6	0
2034 – 2035	1.8	1.6	0
2035 – 2036	1.8	1.6	0
2036 – 2037	1.8	1.6	0
2037 – 2038	1.8	1.6	0
2038 – 2039	1.8	1.6	0
Total 2024 - 2039	54	45	0

- Given that the 2024 GTAA updates the base date of the need assessment to 1 April 2024, any under-supply is therefore taken into account within the base date and applied to the first five-year period (hence the need figure for the first five years is higher than within the remainder of the assessment period to 2039). Accordingly, within this iteration of the Five-Year Pitch Supply Statement, there is no separate need to take into account any previous shortfalls or surpluses in supply as these are already taken into account. It is necessary, however, to ascertain the extent of extant supply (i.e., unoccupied lawful pitches, either by vacancy or non-implemented extant planning permissions) as at 1 April 2024. This is considered within the following section.

Deliverable Supply of Gypsy and Traveller Pitches

10. **Table 3** identifies the calculated allowance, as identified within the GTAA (2024), for additional existing pitches to become available/vacant through mortality within the five-year period, as well as pitches expected to become available through households leaving the borough within the five-year period. **Table 4** identifies those sites with an extant planning permission for additional Gypsy and Traveller pitches as at 1 April 2024, and **Table 5** identifies those existing sites with lawful unoccupied pitches. Finally, **Table 6** identifies the overall expected supply position between 1 April 2024 – 31 March 2029.

Table 3 – Supply: Pitches Expected Through Vacancy

<i>Form of Supply</i>	<i>Pitches Within 5-Year period</i>	<i>Pitches Beyond 5-Year Period</i>	<i>Outstanding Net Pitches</i>
<i>N/A – Number of Existing Pitches Expected to Become Vacant Through Mortality in Next Five Years</i>	2	0	2
<i>N/A – Net Number of Households on Sites Expected to Leave the Area in Next Five Years</i>	2	0	2
Total	4	0	4

Table 4 – Supply: Extant Planning Permissions for Additional Gypsy and Traveller Pitches as at 1 April 2024

<i>Site</i>	<i>Planning Reference</i>	<i>Number of Pitches Permitted (Net)</i>	<i>Number of Pitches Completed as at 31 March 2024</i>	<i>Pitches Within 5-Year period</i>	<i>Pitches Beyond 5-Year Period</i>	<i>Outstanding Net Pitches</i>
Cinder Hill Wood	20/02649/FULL	3	1	1	1	2
Lordship Stables	21/00184/FULL	2	1	1	-	1
Mile Oak Stables	21/02389/FULL	3	0	2	-	3
Touchwood	21/02236/FULL	3	0	3	-	3
Greenfields Farm	22/02506/FULL	3	0	3	-	3
Funnel Piece	22/01294/FULL	2	0	2	-	2
Oak Tree Farm	23/02519/FULL	4	0	4	-	4
Total				17	1	18

11. Sites with extant planning permission are generally assumed to be deliverable; however, sites which are phased beyond the five-year period generally comprise sites where the Council has seen insufficient evidence of implementation nor deliverability and where the permission is close to expiry. Sites with extant planning permission may also include sites where pitches have been consented for both the short and long-term, with long-term pitches phased beyond the five-year period (while these may not be implemented for a

number of years, they remain extant by virtue of the implementation of short-term pitches).

Table 5 – Supply: Existing Sites With Lawful Unoccupied Pitches

<i>Site</i>	<i>Pitches Within 5-Year period</i>	<i>Pitches Beyond 5-Year Period</i>	<i>Outstanding Net Pitches</i>
Willow Stables	1	0	1
Touchwood	1	0	1
Land Adjacent to 1-3 Holly Cottages	1	0	1
Total	3	0	3

12. The sites listed in **Table 5** are existing sites with lawful unoccupied pitches. All pitches are assumed to be deliverable within the five-year period. Both Willow Stables and Touchwood are existing occupied sites, and while the Land Adjacent to 1-3 Holly Cottages is not currently occupied, the permission has been partially implemented. Given that all three pitches are available for occupation at any time, it is considered an appropriate assessment to consider that they should contribute towards meeting the identified need in the borough.

Table 6 – Overall Supply of Pitches for the Period 1 April 2024 – 31 March 2029

<i>Form of Supply</i>	<i>Pitches Within 5-Year period</i>
Pitches Expected Through Vacancy	4
Extant Planning Permissions for Additional Gypsy and Traveller Pitches as at 1 April 2024	17
Existing Sites with Lawful Unoccupied Pitches	3
Total	24

13. **Table 6** therefore indicates that there is an extant supply of 24 pitches that are expected to be delivered over the period from 1 April 2024 – 31 March 2029. The assessment against outstanding need is addressed within the following section.

Five-Year Gypsy and Traveller Pitch Supply Position

14. The five-year Gypsy and Traveller pitch supply position, covering the period from 1 April 2024 – 31 March 2029, is illustrated within **Table 7** below.

Table 7 – Pitch Supply Position for the Period 1 April 2024 – 31 March 2029

<i>Supply/Need</i>	<i>Number of Pitches</i>
Overall Supply for Five-Year Period	24
Overall Need for Five-Year Period (Ethnic)	37
Overall Need for Five-Year Period (PPTS)	29
Outstanding Need for Five-Year Period (Ethnic)	13 (37 – 24)
Outstanding Need for Five-Year Period (PPTS)	5 (29 – 24)
Five-Year Supply (Ethnic)	3.24 years ((5/37)*24)
Five-Year Supply (PPTS)	4.14 years ((5/29)*24)

15. As per **Table 7** above, the Council can therefore demonstrate a supply of **3.24 years** under the ethnic definition, and **4.14 years** under the PPTS definition. The identified position, however, does not take into account non-consented proposed allocations for additional pitches on existing as well as new proposed sites in the emerging Local Plan.

Conclusion

16. From the above, the Council can therefore not currently demonstrate a five-year supply of Gypsy and Traveller pitches as at 1 April 2024 under either the ethnic or the PPTS definition. The supply position under the ethnic definition is **3.24 years**, and the position under the PPTS definition is **4.14 years**.
17. As above, however, it is important to note that, at this point, the assessment does not include the additional pitches identified and proposed on sites in the [Submission Local Plan](#). These sites (without planning permission at the base date of this Statement) are not included in the current calculation of supply as the emerging Local Plan is yet to be adopted.
18. The [Submission Local Plan](#) and the Council's supporting evidence base (see [Annex 1 of Housing Supply and Trajectory Topic Paper](#)) provides an assessment of estimated additional capacity at existing sites for further pitches through intensification, expansion, and/or regularisation, as well as the potential for new identified sites throughout the borough. These sites are identified in emerging Local Plan Policy H9 as well as Appendix 5 of the Submission Local Plan. While now superseded by the calculations below, the Submission Local Plan (as at December 2020) had identified a sufficient number of sites to meet the need of the 2018 GTAA (32-35 pitches against an outstanding need of 31). A number of the sites allocated as suitable to deliver additional pitches have now been consented and/or delivered.
19. On the assumption that the sites/pitches in the submitted Local Plan are endorsed, then the longer-term position would be as set out in **Table 8** below.

Table 8 - Gypsy and Traveller Pitch Need Against the Potential Supply over the Local Plan Period (as at 1 April 2024)

	Number of Pitches
Pitch Need - April 2024 to March 2039 (Ethnic)	54
Pitch Need - April 2024 to March 2039 (PPTS)	45
Total Supply (Tables 3-5)	25
Outstanding Need – April 2024 to March 2039 (Ethnic)	29
Outstanding Need – April 2024 to March 2039 (PPTS)	20
Potential Additional Pitch Capacity at Existing Sites (SLP)	12-13
Potential additional pitches at new site allocations	3
Anticipated Supply v Ethnic Need (April 2024 to March 2039)	40-41 (supply) v 54 (need) = shortfall of 13-14
Anticipated Supply v PPTS Need (April 2024 to March 2039)	40-41 (supply) v 45 (need) = shortfall of 4-5
Anticipated Supply v Ethnic Need (April 2024 to March 2038)	40-41 (supply) v 52 (need) = shortfall of 11-12
Anticipated Supply v PPTS Need (April 2024 to March 2038)	40-41 (supply) v 43 (need) = shortfall of 2-3

Anticipated Supply v Ethnic Need (April 2024 to March 2035)	40-41 (supply) v 47 (need) = shortfall of 6-7
Anticipated Supply v PPTS Need (April 2024 to March 2035)	40-41 (supply) v 39 (need) = surplus of 1-2

20. **Table 8** therefore shows that, while there would be a shortfall in meeting needs to the end of the emerging plan period (31 March 2038), there would be a surplus in provision of pitches to the end of the proposed 10-year supply period post-adoption to 31 March 2035 through existing and proposed supply using the PPTS definition of need.
21. The Council is committed to an early review of the Local Plan post adoption, and as part of the early review will seek additional sites and/or to additional capacity at existing sites in order to ensure that the full needs of Gypsies and Traveller within the borough are met in full to the end of the plan period.

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