



Consultation Response – Proud Gypsy Traveller CIC

Question

Do you agree with incorporating Planning Policy for Traveller Sites within the draft Framework?

Response: Strongly agree (with qualifications).

Reason

Incorporating Planning Policy for Traveller Sites within the National Planning Policy Framework has the potential to improve policy coherence and ensure that Gypsy and Traveller accommodation is considered alongside wider housing policy.

However, integration alone will not address the long-standing structural shortage of authorised Gypsy and Traveller sites.

Evidence from welfare reporting undertaken by Proud Gypsy Traveller CIC demonstrates that lack of authorised sites remains the primary driver of unauthorised development. Families frequently submit retrospective planning applications not as a deliberate attempt to circumvent the planning system, but because no lawful accommodation alternatives exist.

The Framework should therefore explicitly recognise Gypsy and Traveller sites as culturally appropriate housing and ensure that local authorities properly assess and plan for accommodation need.

Without this, incorporation of traveller policy risks becoming a procedural change rather than a meaningful solution to the shortage of lawful sites.

Question

Do you agree with the new intentional unauthorised development policy (DM8)?

Response: Partly disagree.

Reason

Policies relating to intentional unauthorised development disproportionately affect Gypsy and Traveller families because they are the group most affected by the national shortage of authorised sites.

Evidence from welfare reporting demonstrates that many families who develop land without planning permission do so after being unable to access authorised accommodation.

Recent legislative changes under the Police, Crime, Sentencing and Courts Act 2022 have significantly increased the risks associated with roadside living. Families living roadside may face:

- seizure of caravans
- significant fines
- criminalisation of adults
- potential imprisonment.

In this context, the decision to establish accommodation on land owned by a family is often driven by necessity rather than intention to circumvent planning control.

Planning policy must therefore allow decision-makers to consider:

- lack of authorised sites
- welfare considerations
- children's education
- health needs
- safeguarding considerations.

Removing this discretion risks turning planning enforcement into a mechanism of displacement rather than proportionate planning regulation.

Question

Are there specific harms arising from intentional unauthorised development that should be considered?

Response

The consultation should also consider the harms arising from lack of authorised accommodation.

Evidence from welfare reporting demonstrates that accommodation insecurity can result in:

- disruption to children's education
- deterioration in mental health
- increased safeguarding concerns
- financial hardship caused by repeated planning appeals.

In several cases documented through welfare reporting, families have been required to repeatedly apply for temporary planning permission over many years. This creates long-term uncertainty and significant financial strain.

Planning policy must address the root cause of these situations: the structural shortage of authorised Gypsy and Traveller sites.

Question

Do you agree with the proposed approach to development outside settlements?

Response: Partly disagree.

Reason

Gypsy and Traveller sites have historically been located outside settlement boundaries due to land affordability, cultural traditions and historic settlement patterns.

Restricting development outside settlements risks making new Gypsy and Traveller site provision extremely difficult.

Small family sites are often the most realistic and deliverable form of accommodation.

Planning policy should therefore explicitly recognise small Gypsy and Traveller sites as appropriate forms of rural development where they meet reasonable planning criteria.

Question

Do you agree with the proposed definition of settlements?

Response: Neither agree nor disagree.

Reason

While the definition of settlements may work for conventional housing, Gypsy and Traveller accommodation often operates within different spatial patterns.

Gypsy and Traveller sites are frequently located in rural areas and function as small extended family communities.

Planning policy should recognise that culturally appropriate accommodation may not always align with conventional settlement pattern

Question

Do you agree with the revised presumption in favour of sustainable development?

Response: Partly agree.

Reason

The presumption in favour of sustainable development should apply equally to Gypsy and Traveller accommodation.

However, sustainability must be considered in terms of social and cultural factors as well as physical location.

Stable authorised sites can deliver significant social benefits including:

- improved educational continuity
- better health outcomes
- stronger family support networks.

Planning decisions affecting Gypsy and Traveller accommodation should therefore consider social sustainability and equality duties.

Question

Please provide evidence that policy could adversely affect Gypsies and Travellers or other protected groups.

Response

Evidence from welfare reporting highlights several ways in which planning policy can disproportionately affect Gypsy and Traveller communities.

For example, one welfare assessment involved a family with a child with severe autism requiring specialist educational provision.

The family had created small outdoor spaces within their site to help regulate the child's behaviour and provide a quiet sensory environment.

Planning enforcement action sought removal of these structures.

Such domestic adaptations would normally be considered routine within the garden of a conventional dwelling. However similar structures on Gypsy and Traveller sites may be treated as breaches of planning control.

This example illustrates how planning frameworks can unintentionally penalise Gypsy and Traveller families for creating supportive home environments that other families are generally permitted to establish.

Planning decisions affecting Gypsy and Traveller accommodation frequently intersect with:

- disability equality duties
- safeguarding considerations
- children's best interests.

Question

Do you have any additional comments on the Framework?

Response

Gypsy and Traveller communities have historically functioned as small extended-family micro-communities built around mutual support networks.

Where stable authorised sites exist, welfare evidence frequently shows strong informal care systems supporting disabled children, older relatives and vulnerable family members.

These community structures can reduce reliance on external services and help address issues such as loneliness and isolation among elders, which are recognised priorities within national policy on social care and community wellbeing.

Planning policy should recognise that Gypsy and Traveller sites are not temporary encampments but homes and functioning communities.

Ensuring access to culturally appropriate accommodation is therefore not only a planning issue but also a public health, education and equality issue.