



Proud Gypsy Traveller CIC

## Response to the National Planning Policy Framework Consultation

Submitted by: Proud Gypsy Traveller CIC

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### Introduction

Proud Gypsy Traveller CIC is a community-led organisation advocating for Ethnic Gypsy and Traveller communities through welfare reporting, research, planning advocacy and cultural work.

This response draws on direct casework supporting Gypsy and Traveller families navigating the planning system, including welfare reports prepared for planning appeals, enforcement cases and housing instability.

Through this work we regularly see how planning policy intersects with:

- health inequalities
- disability and neurodivergence
- safeguarding
- domestic violence
- education disruption
- homelessness.

The evidence presented in this submission is drawn from welfare assessments prepared for planning proceedings, enforcement cases and housing advocacy work. This work provides a rare insight into how planning policy operates in practice for Gypsy and Traveller families.

The planning system therefore plays a decisive role in determining whether Gypsy and Traveller families are able to live in safe and culturally appropriate homes.

“Too often Gypsy and Traveller families encounter a planning system that closes every door except the one that leads to enforcement.”

— Violet Cannon, CEO, Proud Gypsy Traveller CIC

### Key Evidence from Practice

Evidence from welfare reporting and planning advocacy undertaken by Proud Gypsy Traveller CIC highlights several consistent patterns within the current planning system:

- **Lack of authorised sites is the primary driver of unauthorised development.** Many retrospective planning applications arise because no lawful accommodation alternatives exist.
- **Planning enforcement frequently intersects with health, disability and safeguarding issues.** Welfare assessments repeatedly demonstrate that planning decisions can directly affect children's wellbeing, educational stability and mental health.

• **Accommodation insecurity generates wider public service costs.** Families experiencing planning instability often require increased support from health services, education systems and social care.

#### Question 4

##### **Integration of Gypsy and Traveller Policy into the NPPF**

Gypsy and Traveller sites must be recognised as culturally appropriate housing.

Planning policy should explicitly recognise Gypsy and Traveller accommodation within housing frameworks relating to:

- affordable housing
- specialist accommodation
- self-build and custom-build housing.

Failure to recognise this creates a structural contradiction.

Where policy mechanisms could benefit Gypsy and Traveller communities they are frequently interpreted in ways that exclude them from eligibility, including access to:

- self-build registers
- affordable housing frameworks
- homelessness provision.

Conversely, where policies can be interpreted punitively, they are often applied disproportionately to Gypsy and Traveller families.

This asymmetry is a recurring feature of the planning system.

#### Questions 31–32

##### **Intentional Unauthorised Development**

Policies relating to intentional unauthorised development disproportionately affect Gypsy and Traveller families.

In practice many retrospective planning applications arise because no authorised accommodation exists.

Recent legislative changes, particularly the Police, Crime, Sentencing and Courts Act 2022, have significantly altered the consequences of roadside living.

Families living roadside may face:

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

For many Gypsy and Traveller families the choice is therefore not between authorised and unauthorised development. Instead, the choice may be between:

- attempting to create accommodation on land they own without permission
- roadside living with the risk of criminalisation and loss of their home.

Planning policy must therefore allow decision-makers to consider:

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

Removing discretion from planning decision-making risks turning planning enforcement into a mechanism of displacement rather than regulation.

A planning system that penalises families for attempting to secure stable accommodation, while simultaneously criminalising roadside living, risks leaving Gypsy and Traveller communities with no lawful or sustainable housing options.

### **Question 39**

#### **Development Outside Settlements**

Gypsy and Traveller sites have historically been located outside settlement boundaries due to:

- affordability of land
- cultural traditions of rural living
- historic settlement patterns.

Restricting development outside settlements risks making new site provision effectively impossible.

Small family sites are often the only realistic mechanism for delivery.

### **Questions 48–51**

#### **Housing Need and Accommodation Evidence**

Gypsy and Traveller Accommodation Assessments frequently underestimate need.

They often fail to capture:

- families living in housing who wish to return to sites
- overcrowding within extended family sites
- hidden homelessness.

We have also encountered cases where authorities rely on unusable or uninhabitable pitches to demonstrate supply.

In one case a planning refusal cited available pitches despite the referenced site being uninhabitable for over two years.

Accommodation assessments must therefore involve meaningful engagement with Gypsy and Traveller communities.

## Question 224

### Impacts on Protected Groups

Gypsy and Traveller accommodation issues often intersect with multiple forms of vulnerability including:

- disability and neurodivergence
- poverty
- domestic violence
- barriers to healthcare
- disrupted education.

Welfare reporting demonstrates that accommodation insecurity has direct consequences for public health and educational continuity.

Families living with planning uncertainty frequently experience:

- interrupted schooling
- increased mental health stress
- reduced access to healthcare
- worsening existing health conditions.

Conversely, stable authorised sites are associated with improved outcomes including:

- improved school attendance
- stronger family stability
- improved child wellbeing.

Planning policy should therefore be understood not only as a land-use framework but also as a structural determinant of health, education stability and long-term public service expenditure.

### Additional Issue

#### Housing Inequality on Local Authority Gypsy and Traveller Sites

Residents of many local authority Gypsy and Traveller sites occupy their homes under licence agreements rather than tenancy agreements.

Licence agreements are typically used for:

- holiday parks
- temporary accommodation.

Yet Gypsy and Traveller sites function as permanent homes, often across multiple generations.

Residents rarely leave except through:

- death
- eviction
- family crisis.

Treating residents as licensees rather than tenants reduces security of tenure and creates inequality compared with other local authority residents.

Gypsy and Traveller residents should therefore be recognised as having the same rights and responsibilities as any other local authority tenant.

### **Human Rights Considerations**

The European Court of Human Rights has recognised that governments have a positive obligation to facilitate the Gypsy way of life.

Planning policy must therefore ensure that decisions affecting Gypsy and Traveller accommodation properly consider:

- Article 8 rights relating to family life
- Equality Act duties.

### **Conclusion**

Reform of the National Planning Policy Framework presents an opportunity to address longstanding structural inequalities affecting Gypsy and Traveller communities.

Without structural reform planning authorities will continue to manage the consequences of accommodation shortages through enforcement rather than resolution.

Planning policy must recognise that Gypsy and Traveller sites are:

- culturally appropriate homes
- essential community infrastructure
- a matter of equality and human rights.

Residents must also be afforded the same security of tenure and housing protections as any other local authority resident.

Proud Gypsy Traveller CIC would welcome the opportunity to provide further evidence from welfare reporting and planning advocacy work should the department wish to explore these issues in more detail.

### **Key Policy Recommendations**

#### **Recognise Gypsy and Traveller Sites as Culturally Appropriate Housing**

Planning policy should explicitly recognise Gypsy and Traveller accommodation within housing policy frameworks including affordable housing and self-build provision.

#### **Improve Accommodation Assessments**

Gypsy and Traveller Accommodation Assessments must involve meaningful engagement with communities and identify hidden need.

#### **Ensure Proportionate Planning Decisions**

Planning decisions must retain the ability to consider:

- welfare impacts
- children's education
- health needs
- lack of available sites.

### **Reintroduce a Statutory Duty to Provide Sites**

Reintroducing a duty on local authorities to provide Gypsy and Traveller sites would help address the national shortage of authorised accommodation.

### **Ensure Housing Equality on Local Authority Sites**

Residents of Gypsy and Traveller sites should have security of tenure equivalent to other local authority tenants.

### **Evidence Base**

Evidence referenced in this briefing draws on welfare assessments prepared by Proud Gypsy Traveller CIC between 2023 and 2026.

These assessments examine the impact of planning decisions on children's welfare, health, safeguarding and family stability.

### **Proud Gypsy Traveller CIC**

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