

## Matthew Pennycook MP - Minister for Housing and Planning

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Decent Homes Review Team

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Dear Minister,

## **Decent Homes Standard review: Gypsy and Traveller site accommodation**

We write following our submission to the Decent Homes Standard (DHS) consultation. While we welcome the Government's intention to improve living conditions in rented accommodation, we note that the current proposed changes to the DHS do not include protections for residents living in rented accommodation on Gypsy and Traveller sites.

The Social Housing Regulation Act (SHRA) 2023 and the Renters' Rights Bill (RRB) support the strengthening and expansion of the DHS to social and private rented accommodation. However, the SHRA relies on the definition of 'social housing' in the Housing and Regeneration Act 2008, and the RRB relies on the definition of a 'dwelling' in the Housing Act 2004. Neither of these explicitly includes accommodation on residential Gypsy and Traveller sites, which has resulted in exclusions in practice. These exclusions deny site residents vital protections against disrepair.

Evidence shows poor living conditions on Gypsy and Traveller sites and a need for effective recourse to challenge landlords who fail to address these issues. For example, the Office for National Statistics published research in 2022, which highlighted poor living conditions on sites, including fly-tipping, vermin infestation, damp and leaks in rented facilities and the general need for repair. Research participants reported that the local authority often failed to deal with these issues in a timely manner.

Gypsy and Traveller sites provide a significant proportion of private and socially rented homes. According to the January 2025 Caravan Count, there were over 16,000 caravans stationed on private sites, and over 6,000 caravans on socially



rented sites. Rented accommodation on Gypsy and Traveller sites typically includes rental of an individual amenity block containing essential parts of the home such as kitchen and bathroom facilities, and a base on which to station a mobile home. There are some cases in which the resident also rents the mobile home from the landlord. It is often these facilities rented from landlords on Gypsy and Traveller sites, which are in a state of disrepair, presenting serious health and safety risks to residents.

Excluding this type of accommodation from the DHS presents a clear conflict with the Equality Act 2010, given that most sites are occupied by Romany Gypsies and Irish Travellers, who are recognised ethnic groups under the Act. However, the Equality Impact Assessment (EIA) for the DHS review makes no reference to the impact of excluding certain types of rented accommodation from the DHS. It therefore neglects to consider any potential impact of the exclusion of sites on Gypsies and Travellers.

The EIA refers to the "strong case for change to set and raise standards in rented housing that improve health and wellbeing, improve educational attainment for children and support economic growth." We support this sentiment, but there is strong evidence showing that Gypsy and Traveller communities experience disproportionately poorer outcomes across a range of social indicators, including in education, health, and significantly higher levels of economic exclusion compared with the overall population. This illustrates the need to ensure that Gypsies and Travellers are able to access safe and secure accommodation, to prevent any exacerbation of existing inequalities.

The Government has a crucial opportunity in the DHS review to make meaningful changes, so the improved and broadened standards include those who live on Gypsy and Traveller sites. Given the points raised here, and in our consultation response, we urge the Government to take urgent action to:

- assess the impact of the exclusion of rented accommodation on Gypsy and Traveller sites from the DHS on Gypsies and Travellers, and
- amend the Decent Homes Standard to apply to rented accommodation on Gypsy and Traveller sites.

We look forward to your response, and would welcome a meeting to discuss this further.

Yours sincerely,

Abbie Kirkby Head of Public Affairs and Policy

gypsy-traveller.org