

Secretary of State for Environment, Food and Rural Affairs, Emma Reynolds MP
Department for Environment Food and Rural Affairs
Nobel House, 17 Smith Square
London, SW1P 3JR

Minister for Housing and Planning, Matthew Pennycook MP
Ministry of Housing, Communities and Local Government
2 Marsham Street
London, SW1P 4DF

26 September 2025

Dear Emma and Matthew,

RE: Biodiversity Net Gain – inequity in exemptions

We write as Chair and Co-Chair of the APPG for Gypsies, Travellers and Roma. We wish to draw your attention to an inequity in the application of Biodiversity Net Gain (BNG) exemptions for self-build homes, which is creating an additional barrier to the development of Gypsy and Traveller sites.

The vast majority of private Gypsy and Traveller sites fall within the ‘minor development’ category and are self-build sites occupied by their owners. While BNG exemptions exist for self-build and custom-build applications, the definition set out in the Self-build and Custom Housebuilding Act 2015 refers to ‘housebuilding’. As a result, many local planning authorities do not accept small-scale Gypsy and Traveller sites as qualifying, stating that they are not classified as ‘houses’ despite being homes that include buildings and other essential infrastructure.

This interpretation has led to the exclusion of Gypsy and Traveller sites from BNG exemptions that apply to other forms of housing, resulting in indirect discrimination. The requirement to comply with BNG imposes significant additional costs, creating a major barrier to the development of much-needed small family sites.



For Gypsies,
Travellers and
Roma

There is already a well-documented national shortage of Gypsy and Traveller sites. We therefore urge you to address this issue as part of the current reforms to BNG, and to ensure that self-build Gypsy and Traveller sites are explicitly included within the scope of the exemptions.

We would welcome the opportunity to discuss this matter further and to provide any evidence that may assist in your consideration.

Mary Kelly Foy MP and Baroness Janet Whitaker and Mary Foy MP
Chair and Co-chair of the All-Party Parliamentary Group for Gypsies, Travellers and Roma