



**FRIENDS,
FAMILIES &
TRAVELLERS**

March 2026

Response to the proposed changes to the National Planning Policy Framework and Planning Policy for Traveller sites

Report compiled by:
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Friends, Families and Travellers



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Introduction

This response has been prepared on behalf of Friends, Families and Travellers by Dr Simon Ruston, a chartered town planner since 2013 with a specialism in the planning system as it relates to Gypsies and Travellers. Friends, Families and Travellers is a national charity working to end racism and discrimination against Gypsy, Roma and Traveller communities and to protect the right to pursue a nomadic way of life. This response will deal with the various issues within the consultation that impact on Gypsies and Travellers thematically, referring to the consultation questions.

In addition to the ongoing policy and casework evidence which forms the basis for this submission, Friends, Families and Travellers conducted semi-structured interviews with eight Romany Gypsies and seven Irish Travellers who had either applied for planning permission to station mobile homes on their own land for permanent residential use, or lived on a local authority Gypsy and Traveller site, or both. We present their views on some of the proposed changes below.

The submission also includes unpublished research conducted by Friends, Families and Travellers on transit site provision¹. The research was conducted between November 2024 and May 2025 with 106 people across England and Wales. Participants included Romany Gypsies, Irish Travellers, New Travellers, Scottish Gypsy/Travellers, Welsh Gypsies and Showmen. The research was conducted prior to the announcement of the proposed changes, but includes essential evidence for the consultation, and is included under the relevant proposed changes.

¹ Due to be published in summer 2026



We also launched a shortened, more accessible version of key elements of the consultation, for Gypsies and Travellers to engage that way. Those views have been sent in directly, to be considered as part of the consultation.

The merger of Planning Policy for Traveller Sites (PPTS) into the National Planning Policy Framework (NPPF)

'4) Do you agree with incorporating Planning Policy for Traveller Sites within the draft Framework? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.'

We partly agree. Gypsies and Travellers have had standalone policy documents since 1962, so this represents a significant departure from the status quo. The Government's explanation is as follows:

Following our commitment to review the Planning Policy for Traveller Sites to support a clearer and more consistent planning system, we are proposing to incorporate policies relating to traveller sites, currently set out in Planning Policy for Traveller Sites, within relevant chapters of the draft Framework. This will reduce unnecessary duplication and support equitable outcomes within the planning system, while providing greater clarity on how traveller sites should be planned for and delivered. These changes will result in the removal of Planning Policy for Traveller Sites as a separate document. While some wording has been changed or removed, the government's aims in respect to traveller sites remain unchanged.

It is necessary to consider this approach in the context of the ruling of the European Court of Human Rights in *Chapman v UK*² which states:

...the vulnerable position of gypsies as a minority means that special consideration should be given to their needs and their different lifestyle both in the relevant regulatory planning framework and in arriving at decisions in particular cases. To this extent there is a positive obligation imposed on the Contracting States by virtue of Article 8 to facilitate the gypsy way of life.

The question is whether *special consideration* can still be given through the merger of PPTS into the NPPF. Specifically, do the proposals the Government suggest deliver *equitable outcomes* and *greater clarity on how Gypsy and Traveller sites should be planned for and delivered*?

² (2001) 33 E.H.R.R. 18



On the first point, the comments below consider whether each of the specific changes to the approach to Gypsy and Traveller sites will deliver *equitable outcomes*. In short, where the setting of targets and making of allocations has been placed within the same policies as that of other forms of housing, then this is potentially a transformative measure that will ensure the need is met (nb there are caveats to this). Where there have been measures to bring locational policies for Gypsy and Traveller sites in line with other forms of housing, then this is likely to worsen the chances of equitable outcomes.

On the second point, there has been a gradual reduction in the amount of detailed policy on Gypsy and Traveller sites since 2006. By way of example, Circular 01/06 ran to some 28 pages and had detailed policy on many specific aspects of planning for Gypsy and Traveller sites. From 2012, the various versions of PPTS removed a significant amount of this detail (the current version is 11 pages long). Some of the detail in Circular 01/06 was important to aid understanding of the reasons why special consideration should be given to Gypsy and Traveller planning matters. For example, to provide context, paragraph 5 stated:

'Gypsies and Travellers are believed to experience the worst health and education status of any disadvantaged group in England. Research has consistently confirmed the link between the lack of good quality sites for gypsies and travellers and poor health and education. This circular should enhance the health and education outcomes of gypsies and travellers'.

This context is important for planning officers, elected members and the general public, as even with some of the more problematic proposals discussed below, there is still a different planning regime for Gypsy and Traveller sites than there is for bricks-and-mortar accommodation.

There are other matters, such as site selection (see below), where detailed guidance would be helpful for local planning authorities (LPAs).

On balance, subject to the amendments or clarifications set out below, our view is that the merger of PPTS and the NPPF is positive as it has the potential to ensure that LPAs take a plan-led approach to site provision. However, there is still a real need for detailed guidance as Gypsy and Traveller sites do have a number of relatively unique considerations in comparison to other forms of development.

One option for the Government would be to insert sections into the Planning Practice Guidance which address some of these matters. We would suggest that the following would be relevant (nb this list is not exhaustive):

- a) Community engagement with Gypsies and Travellers
- b) Pitches on strategic allocations
- c) Human rights and equalities considerations
- d) Site selection (see below)

e) Gypsy and Traveller Accommodation Assessments (see below)

Approach to weight

‘5) Do you agree with the proposed approach to simplifying the terminology in the Framework where weight is intended to be applied? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.’

We strongly disagree with this. This appears to be part of a change to a ‘rules-based’ approach. The consultation paper sets out that one of the Government’s principal objectives for the revised NPPF is to:

Make the policy which it contains more ‘rules-based’ and certain, and so more capable of supporting timely and consistent planning – especially in those places where development is most desirable, where national policy should provide for a default “yes” to the principle of development.

This has problematic consequences for the drafting of some of the policies set out below, namely those on intentional unauthorised development and development in the countryside. Gypsy and Traveller site planning proposals can often be finely balanced due in part to the prevalence of material considerations such as unmet need or personal circumstances. As such, it is important for planning judgment to be able to be applied to the facts of each individual case. A ‘rules-based’ approach would make it significantly harder for decision makers to do this.

Specifically with regard to weight, shifting to an approach that is, for the most part, binary means that nuance and planning judgement will be made more difficult to consider and apply. We would propose instead a hierarchy of weight that decision makers can apply, set out in the glossary of the NPPF. This could look like:

- Substantial
- Significant
- Moderate
- Limited
- None

This hierarchy would mean both a standardised system and the ability of decision makers to properly apply planning judgment.

Duplication of National Decision-Making Policies

‘11) Do you agree with the principles set out in policy PM6(1c), including its provisions for preventing duplication of national decision-making policies? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.’



We strongly agree with this proposal. Some LPAs have overly long or onerous Gypsy and Traveller which is both too prescriptive and can act as a barrier to development. Subject to the amendments set out below, the proposed Decision-Making Policy for Gypsies and Travellers adequately addresses the relevant considerations.

Site identification

'14) Do you agree with the approach to identifying land for development in PM9? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.'

We partly disagree. The issue here is that specific consideration needs to be given to the identification of Gypsy and Traveller sites. The [guidance](#) on this issue includes advice on running [a call for sites](#). Whilst there are some good general principles within this, there is a lack of specific detail on Gypsy and Traveller site provision. For instance, a standard call for sites will tend not to reach Gypsy and Traveller communities, whereas a targeted approach involving visiting sites in an area has been proven to identify sites in the emerging [South Gloucestershire plan](#).

Furthermore, Circular 01/06 contained clear and unambiguous advice on site identification:

35. There are a number of ways in which local authorities can identify specific sites and make land available.

a) Local authorities have discretion to dispose of land for less than best consideration where it will help to secure the promotion or improvement of the economic, social or environmental well-being of the area, as set out in ODPM Circular 06/03.

b) Authorities should also consider making full use of the registers of unused and under-used land owned by public bodies as an aid to identifying suitable locations. Vacant land or under-used local authority land may be appropriate.

c) Authorities should also consider whether it might be appropriate to exercise their compulsory purchase powers to acquire an appropriate site.

d) Cooperation between neighbouring authorities, possibly involving joint DPDs, can provide more flexibility in identifying sites. Such cooperation is particularly important where an authority has strict planning constraints across its area.

The lack of detailed advice can simply be resolved through its inclusion within the Planning Practice Guidance.

Developer contributions

'16) Do you agree that policy PM12 increases certainty at plan-making stage regarding the contributions expected from development proposals? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.'

We strongly agree with this proposal, given the direct reference to policy HO5, which mentions Gypsy and Traveller sites.

Test of soundness

'19) Do you agree that the tests of soundness set out in policies PM14 and PM15 will allow for a proportionate assessment of spatial development strategies, local plans and minerals and waste plans at examination? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.'

a) If not, please explain how this could be improved to ensure a proportionate assessment, making it clear which type of plan you are commenting on?'

We strongly disagree. We are unconvinced that the test of soundness will guarantee that the needs of Gypsies and Travellers are met within local plans. The following extract from the [Kicking the Can Down the Road Report](#) sets out the issues by looking at examples of plans that have proceeded without provision:

In the case of Bristol, a site allocations plan as part of housing provision was allowed to proceed without the Gypsy and Traveller site allocations on the basis of a commitment in the local development scheme to progress with a site allocations document. This commitment was never fulfilled.

Likewise in Southwark, the examining Inspectors would not hold the plan up and excepted future commitments to consider the need.

The same is true in Swale in 2008.

In Preston, commitments in the 2015 Local Plan to produce a joint Development Plan Document (DPD) with neighbouring authorities appears not to have progressed.

In Brighton, examining Inspector stated:

'43. It is less than ideal that the City Plan Part One does not fully comply with the Framework and PPTS, notably the requirements to set pitch targets and identify a five year supply of deliverable sites and sites or broad locations in later years of the Plan period. However, the Council has provided evidence of work undertaken with the aim of identifying a site or sites to meet the need to 2019, which provides a degree of confidence that the Council intends to address this issue in



Part Two of the Plan. In all the circumstances, I consider that this issue is likely to be resolved more quickly through the adoption of the City Plan Part One which will enable the Council to move forward with Part Two of the Plan and, if necessary, an early review of Policy CP22.'

The needs were not addressed in the subsequent plan.

In Cheshire West and Chester, commitments made in the 2015 plan did not happen. What this shows is that it is too easy for Local Planning Authorities to 'kick the can down the road' and defer allocations to a later date. Examining Inspectors, presumably not wishing to hold plans up are all too ready to allow this to happen.

Whilst we welcome the placing of Gypsy and Traveller provision alongside housing policy in some of the NPPF, there is still no guarantee that situations such as those set out above would not occur. This evidence is also compounded by another finding from the report:

Of the 100 local planning authorities where information was available, 64% had failed to allocate sites as part of the development plan process despite 29 years of government policy and guidance that required this.

As such, we would recommend that the test of soundness for local plans ensures that a plan cannot be found to be sound unless, at a minimum, the need for socially provided pitches has been addressed. This could be through a footnote.

Information requirements for planning applications

'22) Do you agree with the policy DM2 on information requirements for planning applications? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.'

We strongly agree with these proposals. All too often, planning applications are not validated without protracted arguments with LPAs over further requests for information that can add to the already significant costs of gaining planning permission.

Determining development proposals

'24) Do you agree with the principles set out in DM3? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.'

We strongly agree with this policy, which should ensure that the application process is less protracted.

Planning conditions

'29) Do you agree with the approach for planning conditions and obligations set out in policy DM6, especially the use of model conditions and obligations?

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.'

We strongly agree with the approach set out in DM6. We would also agree with the use of model conditions, which will ensure that unnecessary restrictions are not placed on sites.

Intentional unauthorised development (IUD)

'31) Do you agree with the new intentional unauthorised development policy in policy DM8? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.'

'32) Are there any specific types of harm arising from intentional unauthorised development, and any specific impacts from the proposed policy, which we should consider? a) If so, are there any particular additions or mitigations which we should consider?'

We strongly disagree with this policy. We would first note that the policy is disproportionately applied to Gypsy and Traveller sites. Using the CLAW website, we found the following:

77 appeals have been determined in the past 12 months that mention IUD, of these 59 (76.62%) relate to Gypsy and Traveller sites.

In the past 12 months CLAW states 1403 section 174 enforcement notice appeals were determined, of these only 45 (3.2%) mention IUD.

Clearly, there is an inequality in the way this policy has been applied. The revised wording will only serve to compound this. Previously, the 2015 Written Ministerial Statement stated it would make:

...intentional unauthorised development a material consideration that would be weighed in the determination of planning applications and appeals.

This meant that the weight to be afforded against a proposal was a matter of judgement for the decision maker. This allowed for there to be an assessment of the reasons for carrying out the development, which might have included homelessness or other personal circumstances which would fall to be considered in the context of

the Human Rights Act 1998. An example of this is this extract from an appeal decision letter³:

63. As already detailed above the appellants did move on to the appeal site in the full knowledge that planning permission was required for the change of use of land from the wholesale nursery to a Gypsy site with four pitches. However, the appellants had owned the old nursery site for nearly three years before they took occupation. During that time, they had tried to engage with the planning system and had made two planning applications, one of which was withdrawn and the subsequent one refused in June 2018. The application the subject of this appeal was submitted around the time the appellants moved on to the appeal site.

64. The appellants made a strong case that their living conditions across two existing sites, in over-crowded conditions, with children with specific health needs had become intolerable. With no security of tenure, they were pressurised to move by others to a point they considered, with no where else to go, they had no choice but to move onto the appeal site. I am mindful that the appellants moved their families onto the site as the Pandemic progressed during 2020.

65. The appellants have carried out works to create a habitable environment but from what I saw at my appeal site visit none of these were such that they could not be relatively easily reversed. I noted that the old nursery buildings were still in situ albeit deteriorating in condition.

66. A stable block was erected after the injunction had been put in place. However, whilst this is regrettable the wooden sectional structure could be easily removed and has an animal husbandry function associated with the cultural business of many of the Gypsy community.

67. I am satisfied that, considering the circumstances described by the appellants, as well as a lack of readily available Gypsy sites within the Borough, whilst intentional unauthorised development has been carried out, I afford this little weight in the balance of this decision.

As can be seen, the current wording of the IUD policy allows for nuance. In contrast, the revised policy states:

*In cases of unauthorised development where consideration is being given to an application for retrospective planning permission (or through an enforcement appeal, whether to grant planning permission in respect of a breach of planning control), if it is concluded based on evidence that the unauthorised development was intentional, that fact should be given **substantial weight** in considering whether to grant planning permission. [our emphasis]*

³ APP/P3420/W/21/3268816

In our view, this is far too blunt a tool to address the issue and takes away the ability of the decision maker to exercise judgement. This is a prime example of how the 'rules-based approach' would not allow for nuance and detail in decision-making.

Development outside of settlements

'38) Do you agree to the proposed approach to development outside settlements? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.'

'39) Do you have any views on the specific categories of development which the policy would allow to take place outside settlements, and the associated criteria? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.'

We strongly disagree. Of all the proposed policies within the NPPF, this has the most risk of reducing the delivery of pitches. This is a regressive measure that is counter to the approach that has existed for almost half a century, as Government policy on the provision of Gypsy and Traveller sites has explicitly accepted that sites will be found in rural areas since 1977. Circular 28/77 stated that:

In certain counties there are areas of open land (including Green Belts, Areas of Outstanding Natural Beauty, etc) where land use policies which apply are severely restrictive to development. It may be necessary, however, to accept the establishment of gypsy sites in such areas, particularly where they come close to urban fringes. There was no requirement for unmet need to be demonstrated.

Whilst the acceptance of sites in rural areas subject to designations was significantly curtailed in 1994, the general acceptance of rural locations was reiterated:

14. In deciding where to provide for gypsy sites, local planning authorities might, for example, consider locations outside existing settlements but within a reasonable distance of local services and facilities, e.g. shops, hospitals and schools. Sites on the outskirts of built-up areas may be appropriate, provided care is taken to avoid encroachment on the open countryside. Many sites may be found in rural or semi rural settings...

In 2006, Circular 01/06 stated:

54. Sites on the outskirts of built-up areas may be appropriate. Sites may also be found in rural or semi-rural settings. Rural settings, where not subject to special planning constraints, are acceptable in principle. In assessing the suitability of such sites, local authorities should be realistic about the availability, or likely availability, of alternatives to the car in accessing local services.



There was no requirement in any of the Circulars for there to be an unmet need in order for permission to be granted.

PPTS since 2012 has continued the acceptance of sites within rural or semi-rural locations (albeit with various caveats). Again, there is/was no requirement in any version of PPTS for there to be some form of unmet need for a site in a rural location to be acceptable.

Aside from the significant change to a long-established principle, there are several practical issues which mean that this change is problematic:

First, even with strategic-level oversight of need figures and the possibility of new guidance for accommodation assessments, Gypsy and Traveller Accommodation Assessments (GTAAAs) will still have the potential to underestimate need. This is especially relevant in areas where there are limited numbers of Gypsies and Travellers, meaning need figures can be as low as 10. Furthermore, the revised

more inclusive definition means that it will be more difficult for assessments to identify need from all those who are eligible (as they may be living in bricks-and-mortar, and more difficult to identify).

Second, applications for sites from Gypsies and Travellers whose needs have not been identified in a GTAA can skew the 5-year supply of sites. This includes those who may have previously been residing elsewhere, as draft policy H012 continues with the PPTS approach and states LPAs should take into account:

c. That applications for sites from any travellers should be considered and not just those with local connections.

Third, in the event of there being a 5-year supply, the applicant will then have to rely on their personal circumstances to be given what would in all likelihood be a personal permission. This involves the need to disclose highly personal information, often in an appeal setting with hostile objectors. It also means that, unlike most other people, there is no option to sell on a site if circumstances change.

Fourth, other policies in the draft NPPF will mean that there is greater competition for land within settlements than ever before, which makes the chances of finding suitable land for Gypsy and Traveller sites more problematic. This includes S5.h, which states:

h. Development for housing and mixed-use development which would be: within reasonable walking distance of a railway station which provides a high level of connectivity to jobs and services [the implication is that Gypsy and Traveller sites are excluded from this criterion]

A return to the principle of sites being acceptable within rural locations would mean that exclusion of Gypsies and Travellers from this policy would not be so problematic.



Finally, for reasons set out elsewhere in this document, the rural exception site policy will not provide sufficient mitigation against the impact of this policy change.

We would ask that the wording of the criterion be simply amended to:

Development of Gypsy, Traveller or Travelling Showpeople accommodation, provided it meets the criteria in policy HO12;

Community views on the location of sites

The NPPF consultation interviews conducted by FFT, included a question on preference for site locations. 13 out of 15 people had a preference for being 'on the edge' of a town, city or village, with access to both the countryside and amenities afforded by an urban hub. Nine out of 15 people emphasised either the cultural importance of rural access in the Gypsy and Traveller way of life, and/or an aversion to living in a built-up area:

"It's my life, the horses, countryside, it's all I know, I've never been a town person."

"I love the animals, important to have that nearby. It keeps it in your generation, the Travellers, keeps our culture going."

"When you go into a church graveyard where there's Gypsies, most of them are buried by the road because the road's our home. We haven't been brought up to live in built-up areas, the young ones do better with it, but it takes away their right to live their natural lifestyle."

"If you're in the city, you're gonna be compromising size-wise, those pitches are tiny, you're all crammed in ... off out a bit you can have the bigger pitch and it's better."

"[At my last site] they built all new flats opposite, this is partly why I come off. There were always people looking off their balcony looking over us. I even had a couple spitting. You wanna be away from everyone, but not too far."

"I want to be right on the edge of the countryside, so I have lots of space."



"I can see fields from my door, and that's important to me, to feel like a Traveller."

The transit research also included a question on the preferred location for a transit site, with the options of rural, suburban, urban or any of the above. Of 106 people:

- 5 preferred rural areas
- 19 preferred suburban areas
- 24 preferred urban areas
- 58 said any of the above

The difference in preference between the transit research and NPPF interviews may be explained by the different accommodation circumstances of the research participants. In the transit research, all 58 of the participants who said they had no preference, had no permanent place to stop. Whereas for the NPPF interviews, all but one participant had secure accommodation. This will undoubtedly impact responses.

Railway stations

'40) Do you agree with the proposed approach to development around stations, including that it applies only to housing and mixed-use development capable of meeting the density requirements in chapter 12? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

- a) Please provide your reasons, including any evidence that this policy would lead to adverse impacts on Gypsies and Travellers and other groups with protected characteristics.'***

We strongly disagree with this policy. It is clear that the density requirements will not meet the need for Gypsy and Traveller sites which require more space. The adverse impact is obvious, the most connected pieces of land will not be available. The primary impact of this will be on the rural fringes of large cities and towns with good transport links where Gypsy and Traveller sites are often found. Areas such as London would be particularly impacted, for example all but one (Sidcup) of the existing Gypsy and Traveller sites in London are within the one-mile distance of stations.

As an alternative, we would suggest that these provisions are not applied to proposals for and including Gypsy and Traveller sites. This would ensure that proposals for sites near railway stations would not be refused on the basis of density issues.

Requirements for spatial development strategies and local plans

'48) Do you agree the requirements for spatial development strategies and local plans in policy HO1 and policy HO2 are appropriate? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

We partly disagree. There are two points in response to this. First, the requirement to identify pitch numbers is placed within the same policy as housing, which in theory gives it an equal footing in the way that planning authorities will approach the assessment of need. We are supportive of this.

Second, section 2i indicates that the need for socially provided pitches is to be assessed as well (type and tenure). This is a repeat of the wording of the current NPPF at paragraph 63, which has existed since the 2018 version⁴. However, despite this being a requirement of national policy for the last 8 years, we are only aware of 2 GTAAs⁵ that have included a specific figure for social need, which demonstrates local authorities are failing to comply with national planning policy.

The [2021 Census showed](#) that a disproportionate percentage of people who identified as 'Gypsy or Irish Traveller' lived in socially rented accommodation, at 42.3% compared with 16.6% of the England and Wales population. Therefore, it is clearly important that the need for socially provided sites is explicitly identified within local plans.

Between 1968 and 1994 there was a statutory duty for local authorities to provide sites. The Kicking the Can down the Road report identified that out of 100 local authorities surveyed, 77% had social sites. Of these sites, 119 were built before 1994, and only 30 since. This demonstrates starkly that without a statutory requirement, social sites will not be developed. We would ask the government to reintroduce the statutory duty to provide sites. According to the Government Caravan Count figures, between [January 2014](#) and [January 2024](#), there was a decrease of 102 permanent pitches.

At a very minimum, the wording of the policy would benefit from being made clearer to ensure social provision is assessed and then provided for, either with a footnote or with additional wording added to the policy or glossary.

Additionally, any specific GTAA guidance issued should ensure that socially provided need is clearly included. The [2007 GTAA guidance](#) had a clear requirement to quantify social provision (the guidance was withdrawn in 2015). However, looking at

⁴ It is also notable that the working of PPTS is less explicit, the only mention of social provision is within the aims: *to promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites.*

⁵ Leeds and South Gloucestershire.



20 GTAA's between 2007 and 2015, only 3 had a specific figure for social provision (see Appendix 1).

As such, what is required is a statutory requirement for the assessment of social need. Planning and Compulsory Purchase Act 2004, sec. 12D (5) states:

(5) A spatial development strategy may specify or describe—

(a) an amount or distribution of housing (of any kind), the provision of which the strategic planning authority considers to be of strategic importance to the strategy area;

(b) an amount or distribution of affordable housing or any other kind of housing, the provision of which the strategic planning authority considers to be of strategic importance to the strategy area.

Subsection 14 states:

In subsection (5) "affordable housing" means—

(a) social housing within the meaning of Part 2 of the Housing and Regeneration Act 2008, and

(b) any other description of housing that may be prescribed.

It should also be noted that section 72 of the Housing and Regeneration Act 2008 allows for the meaning of social housing to be amended by regulation. The Government is invited to consider the following options to ensure that the need for socially provided Gypsy and Traveller pitches is properly assessed:

- Clarification that socially provided pitches are within the meaning of social housing
- Amending the definition of social housing by regulation (sec.77 HRA2008)
- Prescribing that socially provided pitches fall into the meaning of affordable housing

Given the failure between 2007 and 2015 of the GTAA guidance and the NPPF since 2018 to ensure that social provision was assessed, a statutory approach to this issue is essential.

Community views on social site provision

The NPPF consultation interviews included a question asking if participants felt there were enough socially-provided pitches/sites to meet the need in their area. All 15 participants said no:



'My name was down for 6 years, I had to pull on in the end because I'd waited so long and I had nowhere to go ... I had to put my daughter first, she was ill. Where the list was so long, no one was helping, I had to take it into my own hands.'

'If there's a site now you'll have a queue as long as your arm to get it, it's different now. When I was a kid there were more sites, people could move around more.'

'Back when I got my plot it was different, the plots was easier to get then ... But you wouldn't get a plot now, it's impossible, there's not enough for everyone who needs them ... My son's been on a waiting list for a couple of years, and when a new plot come up it just goes again and again to the same one family.'

The transit provision research asked 106 participants if they felt accommodation needs were being met in the local authorities where they needed to travel. 103 answered no:

'No, there need to be more transit sites....I want to do some college courses, but no point as I need somewhere more secure to stay...'

'We travelled around living roadside for years before we got a permanent pitch. As a result, my kids all missed out on school.'

'There is not enough sites. Nor is there enough transit sites and sometimes even no transit sites.'

'we be wanting for a long, long time. I've lost me brother, me sister, been waiting a long time now.'

'If every site in the country had an extra place, a place somewhere, that would be good you know, we would not need a lot just a water tap and toilet would do me honestly...'

'...accommodation needs assessment aren't being met.'

We would also note that there is no reference to the provision of temporary and permanent residential moorings for boat dwellers. There is a requirement in Section 124 of the Housing and Planning Act 2016 for these needs to be assessed, as well as those who live in caravans. As such, we would suggest that residential moorings for boat dwellers is added in as a specific category.

Inclusion of PPTS policies in the housing chapter

'50) Do you agree with the approach to incorporating relevant policies of Planning Policy for Traveller Sites within this chapter? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.'

We partly agree. The obvious point is, where else would they go? But as a matter of principle, it is positive for sites to be considered alongside all other forms of housing, subject to the various amendments we have suggested.

The need for new Gypsy and Traveller Accommodation Assessment Guidance

'51) Is further guidance needed on how authorities should assess the need for traveller sites and set requirement figures? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.'

a) If so, what are the key principles this guidance should establish?'

We strongly agree that there should be new GTAA guidance. As noted above, GTAA guidance has been absent for over 10 years. The impact of this is that LPAs and the research companies that undertake assessments and other related documents have been left to develop their own methodologies, which, in our view, are problematic and end up underestimating the need for pitches. This is particularly relevant to the approach to the revised definition of Gypsies and Travellers. We attach an opinion on how this should be applied by Marc Willers KC.

We will now set out some examples of problematic practice caused by a lack of guidance, and then some suggestions as to the approach that a good GTAA would take. Examples of problematic practice are as follows:

'Undetermined households'

This is an approach used by Opinion Research Services (ORS), and is set out in the [Lichfield GTAA Report, September 2025](#):

'3.25 A GTAA has to consider the needs of any households where it is not possible to determine if they meet the planning definition – usually because we have been unable to complete an interview. These are defined as undetermined households

3.26 Whilst there is no guidance that sets out how the needs of these households should be addressed ORS consider it necessary to estimate potential need from these households. This is an additional need figure over and above the need identified for households that meet the planning definition.

3.27 The estimate sought to identify potential current and future need from any pitches/plots known to be temporary or unauthorised; through modelling need from concealed-doubled-up households and from teenagers based on the outcomes from completed interviews; and through new household formation. As the demographics of the undetermined households are unknown, ORS use our national household formation rate of 1.50% in our analysis to estimate future need.

*3.28 Following the changes to the planning definition in PPTS 2024 it has been assumed that all undetermined households will meet the definition. **However, it is recommended that need from undetermined households is addressed through Criteria-Based Local Plan Policies and not through specific allocations.** [our emphasis]'*

There is no basis for this approach in national policy. It is, however a consequence of lack of detailed guidance on GTAAs and Gypsy and Traveller matters more generally.

Failure to assess need from people in bricks-and-mortar

The change in the definition means that there will be Romany Gypsies and Irish Travellers who live in bricks and mortar, whose needs will need to be identified. However, ORS fails to do this as can be seen in the following extract from the [Lichfield GTAA Report, September 2025](#):

'Bricks and Mortar Households

3.17 The 2021 Census recorded 14 households who identified as either Gypsy or Irish Traveller, or Roma who lived in a house or bungalow in in Lichfield and 9 living in a flat or maisonette.

3.18 ORS apply a rigorous approach to making contact with bricks and mortar households as this is a common issue raised at Local Plan Examinations and Planning Appeals. Contacts were sought through a range of sources including the interviews with people on existing sites and yards; information from stakeholder interviews; and information from housing registers. Interviews are sought with all identified households.

3.19 Through this approach the GTAA endeavoured to enable households living in bricks and mortar the opportunity to make their views known.

*3.20 **ORS do not make assumptions on the overall needs from household in bricks and mortar based on the outcomes of any interviews that are completed**, as in our experience this leads to a significant overestimate of the number of households wishing to move to a site or a yard. We do not model need from households living in bricks and mortar. [emphasis added]*

Another example of a problematic approach to need from bricks and mortar is that of Arc4 in the [Tonbridge and Malling Borough Council Gypsy and Traveller and Travelling Showperson Accommodation Assessment 2025](#):

'Current households in bricks and mortar accommodation (2)

6.11 The 2021 Census suggested there were 116 households living in bricks and mortar accommodation.

Weighting

6.12 Survey data have been weighted to take account of non-response households. The weighting is 50 (total households) divided by 47 (total responses) = 1.064.'

We have been unable to find any justification for this approach within the GTAA, and it does not make any sense in any event. Again, an example of where a lack of guidance leaves a vacuum.

Household formation rates

There has been considerable debate about household formation rates in planning appeals and local plan examinations. ORS have produced their own paper on the subject, arguing that 3% should not be used. This approach was considered in a [review of a GTAA by the University of Salford in 2015](#), which found the following on rates of household formation:

The issue

The GTAA problematizes the use of a commonly employed indicator of household formation, which utilises a standard figure of 3% growth per annum (compound), referring to criticisms made at planning appeals and comments by politicians about the logic of using such an indicator. Drawing upon findings from some in-house modelling which combines birth rates of Roma from Hungary, findings about mortality from a health study in England (Parry et al, 2004) and evidence from their surveys of households, the authors of the Essex GTAA indicate a 1.5% pa compound household growth figure. Within the GTAA they increase this by 0.5% to 2%pa to account for potentially understatement of need from hidden populations in bricks and mortar housing or concealed households (although the latter is stated as being adjusted for in the concealed household element at para 8.25). For Maldon, over the 20 year period, this equates to 32 additional pitches. The local authority questions the use of the 2% on the basis that ORS have found that 1.5% pa better explains the growth based on national modelling and their assertion about the older demographics of the local Gypsy and Traveller population.

Implications

Data on the household growth of Gypsy and Traveller households remain in its infancy to accurately determine the rate of growth with any certainty. There has only been a single UK Census that has identified Gypsies and Travellers as a distinct population and many GTAAs have taken a sampling approach within their methodologies which has predominantly relied on self-reports from households. It should be welcomed that the authors have sought to improve the empirical basis for household formation rates. However, it is not clear how applicable the use of birth rates from Hungarian Roma population statistics are to UK Gypsy and Traveller populations and, although the study by Parry et al (2004) is significant, there remains a dearth of studies detailing mortality rates of Gypsy and Traveller populations. It is therefore unclear how much validity the 1.5% household formation rate has.

Possible adjustments

It is difficult to predict how the population of Gypsies and Travellers will develop under different levels of increase in the supply of pitch based accommodation. In order to plan for future needs, and build in resilience to the evidence, it may be prudent to utilise a range figure for growth of both 1.5% pa and 2% pa. However, planning only for the 1.5% pa figure may not provide for possible understatement resulting from shortcomings in accessing households in bricks and mortar and concealed households.

It is also helpful to consider the approach to this issue found in 2007 DCLG (as it was then) document Preparing Regional Spatial Strategy reviews on Gypsies and Travellers by regional planning bodies:

Q6: What allowance is made for future population growth and household formation?

The issue

Future population growth and household formation is often the main element in needs assessments in mainstream housing. In the past, it sometimes seems to have been forgotten in the context of Gypsy and Traveller site provision. However, our research has shown that the demographics of the Gypsy and Traveller population suggest that population growth and family formation is likely to be significantly higher than in the population as a whole. Average family size is larger – across GTAAAs reviewed it averaged just under 4 persons compared with a national average of 2.36 persons. Gypsies and Travellers traditionally have married and started families young meaning that a ‘generation’ is relatively short – many grandparents are only in their 40s. Other things being equal, this means that pitch requirements from population and household growth are likely to be relatively rapid. Many authorised sites have high proportions of children among their residents. Over the next five years young adults will marry and form their own families and any longer term trends towards more ‘normal’ family structures are not relevant in short-term assessments. Several studies use a figure of 3 per cent a year compound for household increase. In the Republic of Ireland, Task Force assumptions of 4 per cent a year compound have proved remarkably accurate. Multipliers, where used, should be relevant to the characteristics of the local population.

Implications

An assessment which ignores future household formation will underestimate pitch requirements. An assessment using a figure much less than 3 per cent a year probably will also under-state requirements from this element unless there are particular population characteristics to justify it (for example a high proportion of New Travellers).

Possible adjustments

Where this element is missing, RPBs might consider applying an assumed growth rates of 3 per cent pa compound to the total number of existing Gypsy and Traveller households on authorised pitches and unauthorised developments.

It then went on to state:

'At present, the best assumption to be made for a period when the current backlog of site need has been cleared is household growth rate of 3 per cent a year compound. This would give an indication of long-term requirements and would counter any perception that Gypsy and Traveller need can be met on a once-and-for-all basis in a way that is not assumed for the settled community. Household growth should be monitored in order to form improved assumptions for the future.'

Given that the definition change now includes many housed Gypsies and Travellers, who are typically more difficult to engage with, setting the rate at 3% would seem prudent.

Best practice for assessing the accommodation needs of Gypsy and Traveller communities

Turning now to what should be included within a needs assessment. The following is an updated extract from a [good practice guide](#) produced by a number of different organisations and experts in 2016.

A good assessment: things to do

Have strong community member engagement:

Community member engagement should be central to a good assessment, whether involved directly in the undertaking of surveys, such as community enumerators, or carrying out support work assessing local communities, such as engaging Gypsy and Traveller people living on the road or in bricks-and-mortar in the area. This should involve paid community involvement with all interview or advisory work attracting the same rate as staff employed by the local authority or contracted private company. Without community member involvement, assessments are likely to be inaccurate. In particular, these inaccuracies often involve undercounting and a failure to fully comprehend household patterns. Local authorities, particularly those without



their own liaison officers, may have limited information or be poorly informed about their local Gypsy and Traveller communities.

Use resources already available:

Those working directly with Gypsies and Travellers, such as Gypsy and Traveller Liaison Officers, typically have established relationships with community members and can prove valuable in disseminating key information, such as on forthcoming assessments, as well as allaying potential anxieties. As such, they should be fully involved in an advisory capacity from the beginning of any assessment exercise.

Build trust and explain purpose:

Those undertaking assessments need to clearly explain the purpose of the study and demonstrate honest intent. It is also important to be clear that any provision will take time to be delivered, to ensure more complete and comprehensive responses. Building trust and taking care to outline intent and how information will be used not only assists in further disseminating key information—it also fosters goodwill at a local area level.

Focused, straightforward questionnaires:

Ask no more questions than are required to establish key need figures, and use clear, understandable language. As part of engaging effectively, you should always try to formulate questions by consulting with community members, who are often best placed to advise on appropriate language. Strongly consider use of pictorial images alongside written questions to help with comprehension.

Use checks and balances:

Data provided requires the confidence of both the local authority and community members. This is best gained through regular dialogue during the survey period and as the report is produced. Best practice assessments undertaken in the past have typically had access to a community advisory group that helps with engaging community members as well as offering views on the coverage of interviews and recommendations made for accommodation.

Ask questions about site location:

One legitimate question to include on a questionnaire regards seeking opinions about the location and design of potential future sites. This directly relates to



accommodation and provides the local authority with relevant information about how best to meet need identified within surveys.

Build on previous work and the criticisms of it:

In most cases, there will have already been a number of prior GTAAs in a particular locality. It is likely that considerable resources from local authorities and Gypsy and Traveller organisations will have been engaged in the earlier assessments. Some assessments were subject to processes which appraised their methodologies and the soundness of the conclusions. As such, it is important that the findings and recommendations/critiques of earlier GTAAs are built on and earlier mistakes avoided. Comparison with previous surveys provides a reality check and helps to build up a body of reliable and valid evidence.

Carefully consider survey timings:

It is recommended to carry out surveys at times of year when the return rate will be highest and results consequently most representative. Undertaking surveys solely during the summer months is best avoided, as there is a greater chance of missing respondents who would come under the definition of travelling and therefore underestimating actual need. Surveys should be carried out over a 9 to 12-month period to mitigate the risks of misrepresenting need. With fairs operating from April to October, very careful consideration must be taken of those not present during the surveys but who should be reflected in the need figures.

A poor assessment: things to avoid

Rely only on existing data:

It is critical that assessments are not a desktop exercise alone. An assessment relying exclusively or heavily on a desktop assessment will be insufficient and flawed. 'Desktop' methodologies tend to focus mainly on the biannual caravan count, which provides a questionably accurate snapshot of residents in caravans. There **must** be field work including the interviewing of community members, to gain an accurate picture of need.

Miss out bricks-and-mortar:

Those living in a bricks-and-mortar represent a significant proportion of Gypsy and Traveller communities in almost any local authority so **must** be factored in. Whilst not all may wish reside on a site/pitch this must be explored through actual interviews. Many Gypsies and Travellers have been left with no choice but to move



into bricks-and-mortar housing because of the shortage of culturally pertinent accommodation. The shortage of social housing means there isn't available housing stock for their children, who often retain a cultural preference for living on suitable sites. The changes to the definition of Gypsies and Travellers in December 2024 make this particular issue of significant relevance as Romany Gypsies and Irish Travellers who live in bricks-and-mortar will be encompassed by the new definition.

Misunderstand low response rates:

There is a tendency for some people not to identify as Gypsies and Travellers for a range of reasons, including prejudice, and this may often lead to an undercount of need. Just because some need is not easily found does not mean that it is not there. Crucially, utilising community interviewers will lead to higher response rates and a more representative study.

Make simple or formulaic assumptions about turnover:

Assessments involving any form of pitch turnover in their supply rely upon making assumptions; a practice best avoided. Turnover is naturally very difficult to assess accurately and in practice does not contribute meaningfully to additional supply so should be very carefully assessed in line with local trends. Mainstream housing assessments are not based on the assumption that turnover within the existing stock can provide for general housing needs.

Presume all existing supply is usable:

Factoring all empty pitches into supply figures is a flawed methodology. The details of pitches need to be assessed before their inclusion. Issues such as poor site management or families holding pitches vacant for future needs while someone is working away, mean that some pitches are in practice not available and cannot be considered part of the current supply. Furthermore, pitches on private sites tend to only be available to an owner's family (unless they are explicitly available for rent on the open market).

Ask irrelevant or leading questions:

Questionnaires should focus on accommodation need, not address wider matters of repairs or satisfaction with general local services, although questions about family members with disabilities etc. can be relevant to assessing need and how many other people may need to live on a site to provide support. It is important that when questions are asked about travelling, community members can detail everything



relevant to their travelling patterns. As this section of the survey will support decisions being reached on 'Gypsy/Traveller status', it is critically important to avoid having only a narrow set of potentially incomplete answers available for selection in the questionnaire. For Romany Gypsies and Irish Travellers, ethnicity alone should be sufficient to prove that they have a *cultural tradition of nomadism or of living in a caravan*, now required by Planning Policy for Traveller sites.

Ignoring roadside encampments:

Roadside camps represent a clear manifestation of need, likely to relate to that local authority's responsibilities. Whilst it is possible those on the camp do not wish for accommodation in that area, this must not be presumed and requires surveying to confirm. Needs assessments are of Gypsies and Travellers residing in **or resorting to** an area, i.e. including those coming to an area for work and as such these households **must** be included in assessments. The needs of mobile Gypsies and Travellers will be underplayed if there is a focus exclusively on private and public sites; those sites which are easiest to identify.

Ignoring or downplaying New Traveller needs:

It is critical to avoid ignoring New Travellers when undertaking a count, noting that they can meet the planning definition of 'Gypsies and Travellers' contained in *Planning Policy for Traveller Sites*, December 2024.

Miscalculating migration:

There is a tendency for assessments in areas of high need, high constraint i.e. through planning regulation/Green Belt/limited space, to take account of out-migration. Similarly, in areas with low identified need and fewer constraints on provision there is a tendency in assessments to ignore the pressures for in-migration.

Our view is that any guidance should include the approach set out above.

Community views on GTAAs

The NPPF consultation interviews included a question asking if participants were aware of GTAA's being conducted, if they had ever been asked to take part in one, and if they felt their views/needs were heard.

10 of the 15 participants did not know what a GTAA was, and just one had been asked and taken part in an assessment:



'I felt it was a waste of time. They may have recorded my views ... but it doesn't reflect in the way sites have been built, they didn't listen to me. It was a very poor assessment. They don't understand the needs of families, they aren't accounting for how we live. Gypsy and Traveller kids stay, we want to live close to each other.'

'It [the shortage of sites] all goes back to the original assessment, and them not understanding us, not listening to what we actually need.'

The same questions were asked of 106 people in the transit research. 41 had heard of a GTAA, and 26 had been asked to participate in one.

5-year supply of sites

'54) Do you agree the requirements to establish a 5 year supply of deliverable traveller sites and monitor delivery are sufficiently clear? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.'

We strongly disagree. The requirements with regard to how a 5-year supply of sites is both identified and monitored amount to some 2 sentences:

'10. Local planning authorities should identify and update annually a supply of specific deliverable traveller sites. This should be sufficient to provide a minimum of 5 years' worth of pitches and plots, assessed against their pitch and plot requirement in the development plan.'

This is no different to that which can currently be found in the PPTS. It is useful to first note that in our experience it is rare for a LPA to have identified a 5-year supply of sites.

For example, [research undertaken by FFT in 2020](#) found that only 8 local authorities, out of 68 local authorities in the South East of England, had identified a 5-year supply of specific deliverable sites for Gypsies and Travellers.

Other than non-compliance of LPAs, there are 4 key issues with this policy:

First, the approach allows some LPAs to simply rely on windfall permissions in order to demonstrate that need has been met as opposed to making allocations as per the

policy. The [Kicking the Can Down the Road Report](#) commented on the effectiveness of this policy:

'...even where a local planning authority purports to have a 5-year supply of sites, this is not necessarily indicative of any proactive efforts that have been made to identify sites. It can simply be because there have been sufficient sites granted planning permission (often at appeal). As such, allocations do not need to have been made in order to have a 5-year supply.'

Second, the sites that have been granted permission will more often than not be for use by an applicant and their family; as such, they are not available on the general market as would be the case with bricks-and-mortar housing. The Kicking the Can report identified a number of instances where Inspectors accepted the existence of a 5-year supply of sites, but found there was also a lack of alternative sites.

Third, as LPAs are not specifically required to assess social need, the need for socially provided sites can be obscured if sufficient private permissions have been granted.

Fourth, the approach to how a 5-year supply of sites is assessed varies across LPAs and has been the subject of significant criticism in appeals. For example, in an appeal in Shropshire⁶ The Inspector found that:

'46. It is the GTAA 2025's contention that a five-year supply of sites can be demonstrated. The supply identified as providing a five-year supply of pitches includes:

- 16 pitches at Craven Arms: This is a local authority site that is currently closed for refurbishment. The Council could provide no details of when that refurbishment is scheduled to be carried out or how it is to be funded.*
- 5 pitches arising from household dissolution: There is no guarantee that any pitches will become available in the next five years as they are dependent upon the death of existing pitch residents. Furthermore, the location of these '5 pitches' is undeterminable.*
- 3 pitches granted planning permission since September 2024 (the GTAA site baseline date): the Council confirmed that 1 of these pitches represents an extension of an existing authorised site and it would, more than likely, be occupied by an additional household arising from the*

⁶ APP/L3245/C/25/3363600 & APP/L3245/W/25/3363263

existing authorised site. In respect of the other 2 pitches, the Council could only confirm that they were not the subject of personal conditions.

47. The Framework requires local authorities to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years supply to meet their identified need. The 16 pitches at Craven Arms are not available now and, while the GTAA 2025 says they will come forward within the next 5 years, there is insufficient evidence to show that to be the case. In my judgement, household dissolution should not form part of the 5-year supply of pitches as it is not specific and delivery cannot be guaranteed. Of the 3 pitches granted planning permission, 1 is not available as it has an occupier.

48. Even without assessing the accuracy of the identified need in the GTAA 2025, taking the above factors together 22 of the pitches identified do not represent a supply of specific deliverable sites. Furthermore, in my judgement only 2 pitches could meet the immediate needs of travellers. I therefore find that the Council has failed to demonstrate a five-year supply of deliverable sites to meet the accommodation needs of gypsy and travellers. There is therefore a demonstrable unmet need for this type of development and that need would be immediate if planning permission were to be withheld for the developments the subject of the appeals.⁷

Commented [VG1]: This is such a good example of a shambolic GTAA

Some local authorities now have 'Pitch Delivery Assessments', for which there is no national guidance. One of these documents was considered in an appeal decision letter in Tandridge⁷:

'23. Due to the level of need identified in the GTAA and the lack of supply of available pitches a Pitch Delivery Assessment (PDA) was carried out in an attempt to meet the need. This aims to identify and assess potential sites for pitches and focusses on determining the suitability, availability, and achievability of existing sites and the scope for intensification or expansion of existing sites. The PDA suggests that 43% of all need for the plan period to 2044 could potentially be met. When discounting travelling show-people, this rises to 64% for gypsies and travellers, specifically...

...the Council takes the view that the PDA findings along with planning permissions granted for related development suggest that a supply of deliverable pitches in excess of 5 years can be demonstrated.

However, the PPTS says that for pitches to be considered deliverable they should be available now, have a suitable location, and there should be a reasonable prospect that development can be delivered within the 5 year period...

⁷ APP/M3645/C/24/3349392, APP/M3645/C/24/3349392

*...31. Moreover, the agent says that the IPPS [Interim planning policy statement] fails to provide any clear evidence that the sites identified in the PDA are deliverable whereas the Council takes the view that the evidence base to support the delivery of pitches is up to date, and is of the view that a 5 year land supply exists, and that this should be afforded considerable weight. **As mentioned, Mr Jarman considers that deliverability should have more weight than actual site allocations...***

*...34. **Currently, I am not fully convinced as to whether the level of deliverability expected by the Council will fully bear fruit. The evidence is not yet there and the hoped for success is arguable.***

These are two examples of an issue which, in our experience, is widespread, as the 5-year supply of sites is often a contested matter in many appeals. It is again an example of a policy vacuum which is filled by substandard approaches.

In summary, on the issues with the 5-year supply policy:

- It allows LPAs not to make allocations where sufficient planning permissions have been granted
- The policy is a poor indication of whether need is being met, as pitches are generally not available on the open market
- It does not adequately consider social need due to a lack of clear direction in national policy to do so
- The assessment and monitoring

Turning to solutions, we understand that the 5-year supply policy is the government's chosen approach. Given this, we would suggest the following:

First, we would ask that there be an explicit requirement to identify and monitor the 5-year supply of private and social need separately. This will ensure that the need for socially provided pitches is not lost.

Second, there should be clear guidance on how the 5-year supply of sites should be identified, assessed and monitored in order to fill the current policy vacuum identified above. Any guidance should be highly prescriptive to ensure no room for ambiguity. Considerations could include:

- Intensification or expansion of existing sites should only be included where there is a planning permission in place capable of implementation
- New sites should be the subject of planning permission, which is capable of implementation



- The regulation of unauthorised sites should not be included until planning permission is in place
- Sites without a specific Gypsy and Traveller restrictive condition should not be included

Third, a version of the Housing Delivery Test should be included in the NPPF specifically for Gypsies and Travellers. Given that there are consequences for LPAs for the non-delivery of bricks-and-mortar housing, the same approach should be taken to Gypsy and Traveller sites. This approach would be compliant with sec.149 of the Equality Act 2010.

Large-scale residential and mixed-use development

'59) Do you agree the proposals to support the needs of different groups, through requiring authorities to identify sites or set requirements for parts of allocated sites are proportionate? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.'

We partly agree. This policy is welcomed, but we would strongly suggest that explicit guidance is needed for how LPAs approach this with regard to Gypsies and Travellers.

There has been a tendency in recent years for LPAs to try and meet some or all of their need for pitches from strategic allocations. This has been the subject of considerable debate and has had very mixed results. For instance, pitches allocated on a strategic allocation in South Worcestershire in 2016 are yet to be delivered. At the other end of the scale, in Runnymede, the council has [consulted](#) on how pitches on strategic allocations should be allocated to occupants, and Mid Devon has approved applications which include Gypsy and Traveller site provision on strategic sites. Runnymede in particular have done some detailed work on how section 106 agreements work.

There is also a reported tendency for developers to be very resistant to the provision of pitches on strategic sites. Further reading can be found in a report produced by [Professor Jo Richardson for Mid Devon District Council](#).

For all these reasons, in order to ensure that delivery on strategic allocations is both realistic and of a high quality, detailed advice should be provided in the PPG. This could include advice on matters such as:

- Delivery timescales
- Site design in relation to other aspect of the development
- Off site provision
- Density
- A wide choice of pitch sizes

Weight to be given to unmet need

'62) Are any changes to policy HO7 needed in order to ensure that substantial weight is given to meeting relevant needs?'

No changes are needed.

Off-site provision

'71) Do you support proposals to enable off site delivery where affordable housing delivery can be optimised to produce better outcomes in terms of quality or quantity? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.'

We strongly agree. There are some instances where off-site provision of a Traveller site may be desirable, provided that policy H012 is complied with.

Rural exception sites

'75) Do you agree the proposals provide adequate additional support for rural exception sites? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.'

a) Please provide your reasons, including what other changes may be needed to increase their uptake?'

We strongly disagree. The idea of rural exception sites was included within Circular 01/06. PPTS continued this with **Policy D: Rural exception sites**, which states:

15. If there is a lack of affordable land to meet local traveller needs, local planning authorities in rural areas, where viable and practical, should consider allocating and releasing sites solely for affordable traveller sites. This may include using a rural exception site policy for traveller sites that should also be used to manage applications. A rural exception site policy enables small sites to be used, specifically for affordable traveller sites, in small rural communities, that would not normally be used for traveller sites^[footnote 6]. Rural exception sites should only be used for affordable traveller sites in perpetuity. A rural exception site policy should seek to address the needs of the local community by accommodating households



who are either current residents or have an existing family or employment connection, whilst also ensuring that rural areas continue to develop as sustainable, mixed, inclusive communities.

We are unaware of any examples where this approach has been explicitly used or where a Gypsy and Traveller rural exception policy has been included within a local plan.

Policy **HO10: Exception Sites** of the draft NPPF changes approach in some ways and states:

1. Development proposals for housing or traveller sites on land not already allocated for this purpose, and which are located outside settlements, should be supported where they are:

a. A rural exception site (as defined in the glossary of this Framework) that will provide affordable housing or affordable traveller sites to meet identified local needs – as evidenced through a local housing needs survey or secondary data which is no more than five years old;

or

b. Sites which comprise community-led development which would not qualify as a rural exception site, but which include one or more types of affordable housing as defined in the glossary of this Framework.

2. Unless otherwise specified in the development plan, exception sites brought forward in one of these two ways should:

a. Adjoin or be physically well-related to settlements;

b. Be no larger than 1 hectare in size, or exceed 5% of the size of the existing settlement; and

c. Comprise a majority of affordable housing or affordable traveller pitches. A proportion of market homes may be allowed on the site where essential to enable the delivery of affordable units without grant funding.

There are, however, a number of issues within this draft policy which render it ineffective. First, and most crucially it does nothing different to S5: Principle of development outside settlement, which allows for sites in rural locations where there is an identified need. Furthermore, there is no definition of 'affordable Traveller sites' provided within the glossary. Whilst there may be some theoretical use in high value Green Belt (i.e. not grey belt) given that rural exception sites are appropriate development, there is no evidence to suggest that this policy will deliver more pitches.

Development management policy – H012

'78) Do you agree the proposals to set out requirements for traveller sites at policy HO12 adequately capture relevant aspects from Planning Policy for Traveller Sites, whilst ensuring fair treatment for traveller sites in the planning system? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

79) Please provide your reasons, particularly if you disagree.'

We partly agree. The draft policy merges some of the elements of PPTS together in a way that is more coherent, which is to be welcomed. The criterion are on the whole, clear and concise. There are however aspects that could be improved, and comments in red within the policy below highlight these:

HO12: Traveller Sites

1. Development proposals for traveller sites should be located and designed so that they:

a. Provide a settled base that limits the need for long-distance travelling and potential environmental damage caused by unauthorised encampment, while recognising the extent to which traditional lifestyles (whereby some travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability;

b. Enable access to education, welfare, and health services, including ensuring that children can attend school on a regular basis;

*c. Promote opportunities for healthy lifestyles, such as by providing adequate landscaping and play areas for children, and minimising adverse impacts from local environmental factors (such as noise and air quality) on the health and wellbeing of travellers that may locate there; and**

**Ideally this criterion should be amended to ensure that it is clear that sites should not be built in unhealthy locations that are deemed unsuitable for general housing, such as land that is contaminated (and not capable of remediation) and in close proximity to environmental hazards.*

*d. Do not enclose the site such that the site and its occupants appear to be isolated from the rest of the community.**

**Ideally this should be deleted as it is not necessary. However, if not then it requires amendment. The PPTS version explicitly refers to hard landscaping, this version could be read to suggest that soft landscaping was seeking to enclose a site which would provide reasons to resist permission being granted.*

2. Alongside the criteria in this policy, when considering proposals for traveller sites, local planning authorities should take into account:*

**This section should be amended to make clear that in cases where a proposal is not compliant with section 1 the following material considerations are relevant:*

- a. The existing level of local provision and need for additional sites;*
- b. Other personal circumstances which may be relevant; and*
- c. That applications for sites from any travellers should be considered and not just those with local connections.*

Density questions

'122) Do you agree with the minimum density requirements set out within policy L3? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

b) Could these minimum density requirements lead to adverse impacts on Gypsies and Travellers and other groups with protected characteristics?'

'137) Do you agree policy GB7 (1h) successfully targets appropriate development types and locations in the Green Belt, including that it applies only to housing and mixed-use development capable of meeting the density requirements in chapter 12? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

'138) Please provide your reasons, including any evidence that this policy would lead to adverse impacts on Gypsies and Travellers.'

We strongly disagree. It is clear Gypsy and Traveller sites will not be able to meet the density requirements. The adverse impacts are obvious, as there will be places where Gypsies and Travellers are unable to gain permission. The primary impact of this will be on the rural fringes of large cities and towns where Gypsy and Traveller sites are often found, often in the Green Belt.

We would suggest that these provisions are not applied to proposals for Gypsy and Traveller sites.

Design policies

‘146) Do you agree that policy DP1 provides sufficient clarity on how development plans should deliver high quality design and placemaking outcomes? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.’

We partly disagree. Unless there is specific site design guidance for Gypsy and Traveller sites then design could potentially be used as a reason for refusal for such development.

‘147) Do you agree with the approach to design tools set out in policy DP2? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.’

Strongly disagree – without specific national guidance on Gypsy and Traveller site design, LPAs may either use design tools to object to proposals or devise their own Gypsy and Traveller site design tools which may not be appropriate.

‘148) Do you agree policy DP3 clearly set out principles for development proposals to respond to their context and create well-designed places? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.’

Strongly disagree - Without specific ‘good design’ principles that address the Gypsy and Traveller (GT) community’s atypical housing needs, the majority of the principles cannot be applied realistically to traditional sites.

Gypsy and Traveller sites are disproportionately located close to environmental hazards such as motorways, sewage plants, waste/refuse centres, industrial estates and floodplains, and as a result, residents face health and safety risks in their own homes. Research conducted by Bloch and Quarmby 2024 found:

‘Among the 167 councils who responded, around three quarters (73%) had received environmental complaints from Gypsy and Traveller sites within their areas. The most frequent complaint related to vermin – of those councils that had received complaints around half (51%) had complained about vermin, followed by waste



(38%). Sewage, drainage problems, odour, noise, fire, dust, air pollution and flooding were also issues that residents complained to the council about.'

It is essential that the NPPF sets out clear guidance on good site design, considering proximity to environmental hazards.

Transport policies

'152) Do you agree with the changes proposed in policy TR3(1a), including the reference to proposals which could generate a significant amount of movement, and the proposed use of the Connectivity Tool? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.'

We strongly disagree. As Gypsy and Traveller sites are often in locations with limited connectivity, we would strongly advise that the connectivity tool is not suitable for use in assessing proposals.

Equalities question

'224) Do you have any views on the impacts of the above proposals for you, or the group or business you represent and on anyone with a relevant protected characteristic?

a) If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how.'

'225) Is there anything that could be done to mitigate any impact identified?'

Romany Gypsies and Irish Travellers are recognised as distinct ethnic groups and are protected under the Equality Act 2010. Living in caravans and maintaining a travelling lifestyle are central to both cultures. As a result, these communities are likely to be disproportionately affected by the proposed changes, particularly due to their implications for site delivery. Many of the technical impacts on site provision have already been outlined in the relevant sections above.

In addition to this, the inclusion of 'Gypsy' within the draft document represents a welcome return to the pre-2012 position. However, its use is currently inconsistent. In some instances, 'Gypsy', including in references to 'Gypsy and Traveller sites', is omitted where it would be appropriate, and elsewhere 'Gypsy' and 'Traveller' are not consistently capitalised. For clarity and in recognition of the distinct ethnic and cultural groups to whom the policy refers, the terminology should be applied



consistently throughout the document, including the use of capital letters for Gypsy and Traveller.

Below, we set out the views shared by participants in the NPPF interviews regarding the impacts of the ongoing shortage of sites. They described how this chronic lack of provision has led to homelessness, overcrowding, enforced moves into settled housing, and the gradual erosion of the Gypsy and Traveller way of life.

'The sites now are very, very small, only 8 or 9 plots, and the actual size of the plots is too small for more than one caravan. When the family grows, where are they gonna go?'

'In my local area there's a few but not enough, and they're not big enough. They wonder why people just pull on the plots and claim them cos the waiting list is so long, they have nowhere to go and they're so desperate.'

'We have families all crammed into the same plot, people who are married are having to move back onto their mother's plot. It's a fire hazard how many people are having to cram on to the same site.'

'I was forced to move into a house because I was travelling the roads with nowhere to go ... It's not our culture to live like this, we feel trapped in a house. You've got your freedom when you're in a caravan.'

'They put my friend in a flat where she feels uncomfortable, and she had to come stay here [on a site] with me. Nobody wanted to help her, they just chucked her in. Her neighbour was leaving heroin needles outside her door, but there's just not enough pitches.'

'They want us in houses. Even Travellers go and buy their own land, they're not even allowed to do that. They save up their money, struggling for years to get their own space, and they still want them in houses. You just can't do that. I can't go on trying to be someone else when I'm a Traveller. It's something been taken away from us that we knew all our life, we're shoved into houses we never wanted to be in. Of course if I had a choice I'd rather be on a site.'



'The council woman wants to put me in a flat, I can't live all closed in like that, I've got anxiety and it'll make it worse.'

'I know we come very low down on the list for priority of building places to live, that's why we've so many ended up settled in houses now. It's not our way.'

Others spoke about how difficult it was to get planning permission under the current planning regime, highlighting overt and structural discrimination:

'They've said you've got to put a load of trees up so you can't be seen from the road. It's racism! They wouldn't say that if it was anyone else... My other friends who have planning permission on this beautiful bit of land and they've done it up so nice, their whole place looks like a post card... And even still there was a lady on their committee objecting, whose house is worth millions... She said I'll give it to you because I have no choice, but if I had a choice, I wouldn't give it.'

'...there's a lot of opposition against [building more sites], they don't want people like myself living in the village.'

'My local council are nasty people who don't want Travellers, they're making it as difficult as possible... Our neighbour 2 doors down has just gotten planning permission to build a 12-bedroom guest house, and he told us the council are coming round asking for money to help get us out.'

'It is very hard to get planning permission here, in the village they don't like you, they don't want you to have your own land and have privacy. The council just want you to live like a dog.'

'This land had planning permission on it for a hundred years, but I'm not allowed to build on it because of who I am. They claim it's because of 'outstanding natural beauty' but it is discrimination I assure you, everyone around me has no trouble getting permission.'

'I tried to put in a planning application that didn't mention it was for a Gypsy or Traveller site, and they wouldn't let me, they said I had to say. But if a Black man applied for an extension they're not going to tell him to say 'this is an extension for a Black man'. Because, you know, it gets published publicly, and then it encourages



people to oppose, it encourages discrimination. Unless the government stops and puts a clamp down on the way planning applications are dealt with by the press, no Gypsy will ever be welcomed to the place he wants to live.'

'I came down here 40 years ago, you could buy any land you wanted then. But now the locals won't sell to us. When I go to buy land, I've got to dress up like a snob - take my earrings out, put my hair back.'

Appendix 1 – historic GTAA list

GTAA's with no specific figure for social provision

- [Southern Staffordshire and Northern Warwickshire Gypsy and Traveller Accommodation Assessment – February 2008](#)
- [Ribble Valley Gypsy and Traveller Accommodation Needs Assessment – March 2008](#)
- [Cumbria Gypsy and Traveller Accommodation Needs Assessment Final report 2008](#)
- [Derbyshire Gypsy and Traveller Accommodation Assessment 2008](#)
- [West Yorkshire Gypsy and Traveller Accommodation Assessment 2008](#)
- [Essex Gypsy and Traveller Accommodation Assessment 2009](#)
- [Rossendale Gypsy and Traveller Accommodation Needs Assessment: Update 2010](#)
- [Cambridge sub-Regional Gypsy and Traveller Accommodation Needs Assessment \(GTANA\) 2011](#)
- [North Northamptonshire Gypsy and Traveller Accommodation Assessment Update 2011](#)
- [Solihull Gypsy and Traveller Accommodation Assessment 2012](#)
- [West Suffolk Gypsy and Traveller Accommodation Needs Assessment \(GTANA\) Update 2012](#)
- [Gypsy and Traveller Needs Assessment Update Somerset Local Planning Authorities 2013](#)
- [Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment Telford & Wrekin Council 2014](#)
- [North Hertfordshire– Gypsy, Traveller and Showperson Accommodation Assessment 2014](#)
- [Greater Manchester Gypsy and Traveller Accommodation Assessment 2014](#)
- [Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment Brighton & Hove City Council and the South Downs National Park Authority 2014](#)
- [Kirklees Gypsy and Traveller and Travelling Showperson Accommodation Assessment 2015](#)

GTAA's with a specific figure for social provision

- [A Gypsy and Traveller Accommodation Assessment For The South Housing Market Area Of the West Midlands Region – March 2008](#)
- [Stratford on Avon District Gypsy and Traveller Accommodation Assessment 2011](#)
- [An assessment of the accommodation needs of gypsies, travellers and travelling showpeople within the Borough of Basingstoke and Deane. July 2012](#)



About us

Friends, Families and Travellers (FFT) is a leading national charity that seeks to end racism and discrimination against Gypsies, Travellers and Roma communities and to protect the right to pursue a nomadic way of life. www.gypsy-traveller.org

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