

**Consultation on the Review
of the National Planning Policy Framework (NPPF), 2024**

**Response by Moving for Change and GATE Herts (Gypsy and Traveller
Empowerment, Hertfordshire) working across a range of Gypsy
and Traveller organisations**

Implications for Gypsies and Travellers

Main Messages:

- **The accommodation crisis among Gypsies & Travellers is substantially worse than within the housed population, and must be addressed as part of the review of the NPPF;**
- **The current policy framework for Gypsies and Travellers, particularly in how it is used by local planning authorities, makes it extremely difficult to make adequate provision and is discriminatory;**
- **Planning Policy for Traveller Sites (PPfTS) needs to be amended to make it consistent with the NPPF. Without that, Councils will use it to refuse planning permission. At paras 3.5 – 3.12 below we suggest how this can be done at this stage, rather than waiting for a full review of PPfTS, but if this cannot be done now, at para 3.14 we propose a change to NPPF para 4;**
- **Some of what we need is to reverse a raft of discriminatory measures introduced since 2010;**
- **We can learn a lot from the Welsh Government, including reintroducing the duty to provide sites, and changing the definition of Gypsy and Traveller for planning purposes;**
- **Reversing the running down of Gypsy and Traveller social rented provision is vital; and**
- **We suggest placing responsibility for provision for Gypsies and Travellers at the strategic level.**

1.0 Introduction

- 1.1 We welcome the direction of travel of the proposed changes to the National Planning Policy Framework (NPPF), which are intended to address the imbalance in the planning system between providing adequate, affordable housing and policies of restraint.
- 1.2 At the same time, we are deeply concerned that without significant amendment, the changes as currently drafted will fail to address the accommodation crisis for Gypsies and Travellers, and will have unintended consequences which risk making it even more difficult to make adequate provision.
- 1.3 Our response is in three sections:
- Firstly, Background and Context, which summarises the background to the profound deprivation of Gypsy people in England, and the centrality of the accommodation crisis to that deprivation;
 - Secondly, we summarise our major concerns with the proposed policy reforms and suggest how those concerns can be addressed; and
 - Thirdly, we respond to the consultation questions of most relevance to Gypsies and Travellers.

2.0 Background and Context

- 2.1 Gypsies and Travellers are among the most prejudiced against and deprived communities in Britain, see: England's Most Deprived Groups: Gypsies, Roma, Travellers. Communities, EHRC, 2016¹ and Tackling

¹ <https://www.equalityhumanrights.com/sites/default/files/is-england-fairer-2016-most-disadvantaged-groups-gypsies-travellers-roma.pdf>

Inequalities Faced by Gypsy Roma and Traveller, House of Commons Women and Inequalities Committee, 2019².

2.2 The accommodation crisis and homelessness are far more acute among Gypsies than the settled community. The stress over sites and planning is a major contributor to anxiety, depression and even suicide.

2.3 What was said in the previous Labour government's Circular 01/2006 remains true today:

"5. 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. More settled existence can prove beneficial to some gypsies and travellers in terms of access to health and education services, and employment, and can contribute to greater integration and social inclusion within local communities..."

2.4 A recent Court of Appeal decision³ summarised the background:

"4 Romany gypsies have been in Britain since at least the 16th century, and Irish travellers since at least the 19th century. They are a particularly vulnerable minority. They constitute separate ethnic groups protected as minorities under the Equality Act 2010 (see R (Moore) v Secretary of State for Communities and Local Government (Equality and Human Rights Commission intervening) [2015] EWHC 44 (Admin); [2015] PTSR D14), and are noted as experiencing some of the worst outcomes of any minority across a broad range of social indicators

² <https://publications.parliament.uk/pa/cm201719/cmselect/cmwomeq/360/full-report.html>

³ Bromley LBC v Persons Unknown (CA) [2020] EWCA Civ 12 [2020] PTSR 1043

5 *A nomadic lifestyle is an integral part of gipsy and traveller tradition and culture. While the majority of gipsies and travellers now reside in conventional housing, a significant number (perhaps around 25%, according to the 2011 United Kingdom census) live in caravans in accordance with their traditional way of life. The centrality of the nomadic lifestyle to the gipsy and traveller identity has been recognised by the European Court of Human Rights. In Chapman v United Kingdom (2001) 33 EHRR 18, the court held at para 73:*

“The court considers that the applicant’s occupation of her caravan is an integral part of her ethnic identity as a gipsy, reflecting the long tradition of that minority of following a travelling lifestyle. This is the case even though, under the pressure of development and diverse policies or from their own volition, many gipsies no longer live a wholly nomadic existence and increasingly settle for long periods in one place in order to facilitate, for example, the education of their children. Measures which affect the applicant’s stationing of her caravans therefore have a wider impact on the right to respect for home. They also affect her ability to maintain her identity as a gipsy and to lead her private and family life in accordance with that tradition.”

6 *In the UK, there is a long-standing and serious shortage of sites for gipsies and travellers. A briefing by the Race Equality Foundation found that gipsies and travellers were 7.5 times more likely than white British households to suffer from housing deprivation (Race Equality Foundation, Ethnic Disadvantage in the Housing Market: Evidence from the 2011 census, April 2015). The lack of suitable and secure accommodation includes not just permanent sites but also transit sites. This lack of housing inevitably forces many gipsies and travellers onto unauthorised encampments.”*

2.5 The treatment of Gypsies and Travellers is contrary to various international conventions and the UK Government’s commitment to them, see for example the Council of Europe’s Advisory Committee on the Framework Convention for the Protection of National Minorities,

Fifth Opinion on the UK Government, December 2022. ⁴

- 2.6 We place our concerns in a historical context. In the post-war period the decline in agricultural employment, the comprehensive control of development introduced through the 1947 T&CP Act, and the closing of traditional stopping places (which accelerated following the Caravan Sites and Control of Development Act, 1960) all undermined the traditional nomadic way of life with many Gypsies forced into housing.
- 2.7 The 1968 Caravan Sites Act attempted to address the crisis by imposing a duty on local authorities to provide sites. Nearly all the remaining social rented sites were developed in the 1970s and 1980s when the duty was in force.
- 2.8 The Criminal Justice and Public Order Act 1994 repealed most of the 1968 Act. It abolished the duty on local authorities to provide sites, discontinued grants for sites, and made it a civil offence to camp on land without owner's consent, and a criminal offence if people failed to move when directed to do so.
- 2.9 This forced Travellers to occupy sites without permission, and the resultant negative press coverage around the time of the 2001 general election eventually resulted in C1/06, Planning for Gypsy and Traveller Caravan Sites, which put in place a system to assess and meet needs at the regional level. The years from 2006 to 2010 were occupied by putting in place the regional Gypsy strategies.
- 2.10 Then in 2010, the incoming Government abolished regional strategies and passed responsibility from the regional to the local level. It is difficult not to see a series of actions by the then Secretary of State, Eric Pickles, as motivated by pandering to anti-Gypsy prejudice.

⁴ <https://rm.coe.int/0900001680ab55b4>

- 2.11 In 2015 we had the second edition of PPfTS, which changed the definition of who had nomadic status and was a Gypsy for planning purposes. This had the effect of substantially reducing the numbers who met the definition by 73%.⁵
- 2.12 In parallel, increasingly draconian measures were introduced against unauthorised encampment and many local authorities sought and obtained district wide injunctions against unauthorised encampment anywhere within their district. Together these measures have criminalised and, in the absence of transit provision, made it impossible to follow a nomadic way of life. This then makes it more difficult to get planning permission – a vicious Catch 22.
- 2.13 The 2022 Lisa Smith Court of Appeal decision found that the definition change in 2015 was discriminatory and the December 2023 edition of PPfTS returned the definition to what it had been before 2015.
- 2.14 The Courts have declared that the amendment to Section 60c of the Criminal Justice and Public Order Act introduced through the Police Act 2022 was incompatible with Articles 14 and 8 of the European Convention on Human Rights and represented unjustified racial discrimination. Underlying this judgement and their consideration of borough wide injunctions was the courts recognition that the obvious way to address unauthorised encampment was for local authorities to ensure the provision of adequate transit accommodation. The quotation at para 4 above is from the Court of Appeal consideration of the Bromley Council's application for a borough wide injunction. Among the Court's findings were
'there is an inescapable tension between the article 8 rights of the gipsy and traveller community...and the common law of trespass. The obvious solution is the provision of more designated transit

⁵ Gypsy and Traveller Sites: The revised planning definitions impact on assessing accommodation needs, Equality and Human Rights Commission, September 2019

*sites for the gipsy and traveller community”; and
“borough-wide injunctions are inherently problematic. They give the
gipsy and traveller community no room for manoeuvre”*

2.15 To summarise: it took the previous Labour Government from 1997 to 2006 to develop an effective solution to the Traveller accommodation crisis. The years 2006 to 2010 were taken up with putting that solution in place and in the years after 2010 the progress was abandoned, and put into reverse. We would not want the time-scale of that history to be repeated under the current Government.

2.16 We would urge the new Government to recognise that ensuring sufficient sites both for permanent as well as transit sites will enhance the health and education outcomes of gypsies and travellers and dramatically reduce the costs of enforcement that are presently being wasted by councils which fail to make sufficient sites available.

3.0 Major Concerns with the Proposed Reforms to the NPPF

Leaving Planning Policy for Traveller Sites (PPfTS) in place unamended

3.1 While there are important weaknesses in PPfTS, a major, perhaps the largest, barrier to providing adequate accommodation for Gypsy people is the way that national guidance and Local Plan policy are interpreted and undermined at the local level by decisions by local planning authorities, which are driven by anti-Gypsy lobbying at the local level.

3.2 This is why so many Traveller planning applications are refused, and so many refusals are reversed on appeal. It is why Local Plans, almost without exception, fail to make adequate, and in many cases any, allocations for Gypsies and Travellers.

- 3.3 Seen against that context we are extremely concerned that the NPPF changes will be introduced, but the determination of applications at the local level will continue to be trumped by those strands of PPfTS which remain unaltered and which, far from reflecting the urgency to address Gypsy & Traveller accommodation needs, offer ready reasons for refusal.
- 3.4 With a small number of changes, PPfTS could be rendered substantially more effective. We would specifically recommend that the following changes are introduced as part of the package of changes introduced at this stage in response to the current NPPF consultation.

3.5 **Title and Language**

Many Gypsies and Travellers find the use of the (lower case) term travellers as offensive as denying their ethnicity and the recognition by the courts that Romany Gypsies, Scottish Travellers and Irish Travellers are distinctive ethnic groups protected by legislation. We would therefore ask that the (upper case) term Gypsies and Travellers is used and the document is called Planning Policy for Gypsy and Traveller Sites.⁶

3.6 **Para 4.a.: *'that local planning authorities should make their own assessments of need for the purposes of planning'***

In 2010 the October 2007 DCLG Guidance on Gypsy and Traveller Accommodation Needs Assessments was withdrawn, and local planning authorities encouraged to make their own assessments. The quality of those produced varies, and many are flawed and undercount needs. This could be readily addressed by requiring assessments to be carried out in accordance with updated guidance. Two issues which need to be covered and are ignored by most recent

⁶ This has implications for policy towards Travelling Show-people, which is addressed in PPfTS, but had been addressed separately prior to March 2012.

assessments are affordability issues(and hence the need for social provision), and the need for transit provision.

- 3.7 **Para 16.** *'Inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances. Traveller sites (temporary or permanent) in the Green Belt are inappropriate development. Subject to the best interests of the child, personal circumstances and unmet need are unlikely to clearly outweigh harm to the Green Belt and any other harm so as to establish very special circumstances.'*

This is completely contrary to the change proposed in the new para 152 of the NPPF where development is not inappropriate if a local planning authority cannot demonstrate a five year supply of deliverable housing sites plus buffer. It is essential that the NPPF and PPfTS make explicit that Para 152 also applies to accommodation for Gypsies and Travellers.

Accordingly, para 16 of PPfTS should be deleted.

- 3.8 **Para 25.** *'Local planning authorities should very strictly limit new traveller site development in open countryside that is away from existing settlements or outside areas allocated in the development plan. Local planning authorities should ensure that sites in rural areas respect the scale of, and do not dominate, the nearest settled community, and avoid placing an undue pressure on the local infrastructure.'*

(and para 14. which repeats part of the same message).

These need to be revised to recognise that Gypsies have traditionally always lived in countryside locations, and that in terms of ensuring development is sustainable that meeting unmet accommodation needs will often be more important than whether a location is sub-optimal in terms of access to services.

- 3.9 **Para 27.** *'If a local planning authority cannot demonstrate an up-to-date*

5 year supply of deliverable sites, this should be a significant material consideration in any subsequent planning decision when considering applications for the grant of temporary planning permission.'

This should be made consistent with proposed NPPF para 152, and the limitation to only temporary planning permission deleted. (Temporary planning permissions are a tool much used by Councils, with the effect of perpetuating insecurity, and requiring Gypsies and Travellers to incur the cost of repeated applications for planning permission.)⁷

- 3.10 **Annex 1.** The definition of who is a Gypsy and Traveller for planning purposes in the Annex to PPfTS is highly problematic and over-dependent on the concept of nomadic habit of life, which with the limitations on nomadism and the penalties against road side stopping and unauthorised encampment is increasingly impossible and means the definition is anachronistic.
- 3.11 While the definition, which was reinstated in the December 2023 version of PPfTS addressed the discrimination issues recognised in the Lisa Smith case of old age or ill health, with that discrimination inextricably linked to ethnicity, problems remain, including that the definition discriminates against women, and that it takes no account of ethnicity.
- 3.12 An obvious solution would be to adopt the Welsh Government's definition, which includes recognition of a cultural tradition of nomadism, or living in a mobile home, and in that way gets round the ethnicity issue. Based on the Welsh definition we would recommend that Gypsies and Travellers are defined as:

(a) Persons of a nomadic habit of life, whatever their race or origin, including:

⁷ We have a client whose application for permanent permission in the Green Belt awaits determination after no less than five temporary permissions!

(i) Persons who, on grounds only of their own or their family's or dependant's educational or health needs or old age, have ceased to travel temporarily or permanently, and

(ii) Members of an organised group of travelling showpeople or circus people (whether or not travelling together as such); and

(b) All other persons with a cultural tradition of nomadism or of living in a mobile home.'

3.13 We propose that the above changes to PPfTS are adopted as part of the package of changes introduced at this stage in response to the current NPPF consultation.

3.14 Alternatively, if it is concluded that changes of this scale would need to be subject to a separate consultation process, we would ask that para 4 NPPF is rewritten on the following lines:

'4. The Framework should be read in conjunction with the Government's planning policy for traveller sites, and its planning policy for waste. When preparing plans or making decisions on applications for these types of development, regard should also be had to the policies in this Framework, ~~where relevant~~. Pending a review of Planning Policy for Traveller Sites, where there is conflict between the policies in this Framework and those in Planning Policy for Traveller Sites, the policies in this Framework will take precedence. This includes in regard to any conflict between para 152 of this updated Framework and paras 16 and 27 of Planning Policy for Traveller Sites.

Reinstating Social Provision as a central part of Gypsy and Traveller Accommodation

3.15 Addressing the accommodation crisis among Gypsy people does not just require unblocking the barriers in the planning system to render the

planning system less punitive and discriminatory, it is essential it is complemented by reversing the decline in the social rented sector. For 35 years social rented sites have been neglected and run down. The number of pitches has not increased. When funds were available, local authorities did not take them up. Management is often poor and inadequate. Councils have sold sites off with, in some cases, long term residents bullied off, to create spaces for more remunerative residents.

- 3.16 The increase in provision that has occurred has been solely through individuals battling to win planning permission for private sites. This leaves those who cannot afford to buy land and pay planners and lawyers dependent on trying to get places on rundown social rented sites, or pushed into poor quality private rented housing. This is profoundly inequitable and discriminatory.
- 3.17 We would specifically recommend that:
- The duty to provide sites is reintroduced with Councils required to be able to offer pitches on social rented sites; and
 - Councils should not be allowed to sell off their sites without specific Ministerial authorisation.
- 3.18 In terms of the type of provision required, needs assessments should consider affordability and specify the need for different types on provision: privately provided pitches, pitches on social rented sites, pitches on transit sites and pitches on self-build sites.
- 3.19 The latter suggestion is a response to the need for more creativity in site provision. It reflects the ambition among many, probably most, Gypsies and Travellers to own their own family site, and of their strong, practical building skills. We envisage allocating small to medium sites (of the scale of 3 to 6 pitches) which could be developed and sold to individual Gypsies with basic services - fencing, water supply, foul drainage etc – with site completion left to the new owners, and funds from sale of the pitches recycled into

further pitch provision. Such an approach would be v popular with Gypsies and Travellers, and an equity share variant could be developed.

3.20 A number of local authorities are responding to major shortages of provision by proposing allocations as part of urban extensions, and garden villages, but without any sense of how such sites will be developed. The record of delivery with such schemes is extremely poor⁸ because, at root, neither local authorities nor developers really want Gypsy provision. At the same time, we would suggest that such allocations have the potential to relaunch a programme of public site provision and to provide the land for a programme of self-build / equity share sites.

3.21 If social provision is to be successfully resurrected, the chronic shortage of skills in site development and site management must be addressed. We have some thoughts about this:

- Part of the skill shortage issue is because of the number of councils with just one or two sites, which they do not have the resources to manage properly;
- The situation has got worse with the abandonment in 2010 of the strategic, regional dimension to planning for Gypsies and Travellers;
- We can see merit in placing responsibilities for Gypsies & Travellers at the strategic, above local level. This would include in regard to accommodation needs assessments, spatial strategy towards new site provision, provision of transit sites, site development, and site management. Such an approach would allow strategic authorities to develop expertise and leadership in this area. It would take decision away from the local level where decisions are more vulnerable to local political pressures;

⁸ The site at Chelmsford that was mentioned in our meeting is the only successful scheme we are aware of. There were local reasons why it was successful.

- Homes England and other agencies should support the development of site development and site management skills, including through Homes England's regulation and funding of housing associations;
- Management needs to involve Gypsies and Travellers. This is both in regard to social rented sites and particularly to transit sites, the management of which can be challenging, and the only examples we know of where it is being carried out effectively are by Gypsies and Travellers.

Unintended Consequences

3.22 Given the inability of local planning authorities to allocate sites, Gypsies and Travellers often acquired marginal sites, such as former scrap yards and abandoned glass houses. Reflecting the limited harm such sites do to the Green Belt, they form a considerable proportion of those which have been won on appeal in Green Belts. An example of an area with a substantial number of such sites is the concentration of former glass houses in the Lea Valley on the Hertfordshire / Essex border.

3.23 It is precisely these types of sites, which are likely to be defined as grey belt. There is a double risk here. Notwithstanding the mechanisms proposed to limit the increase in land values, prices will inevitably rise, and render such sites unaffordable for all but the most affluent Gypsies. At the same time, given the choice for local planning authorities between allocating such sites for housing and business development and allocating them for Gypsy and Traveller sites, most local planning authorities will opt for housing and business. The supply of such sites for Gypsies and Travellers will be cut off.

4.0 Responses to the Consultation Questions most relevant to Gypsies and Travellers

<p>Question 7</p> <p>Do you agree that all local planning authorities should be required to continually demonstrate 5 years of specific, deliverable sites for decision making purposes, regardless of plan status?</p>	<p>Yes, para 77 needs to include specific reference to maintaining a supply of Gypsies and Traveller pitches in accordance with an up to date and robust assessment of needs prepared in accordance with new guidance on preparing such assessments</p>
<p>Question 9</p> <p>Do you agree that all local planning authorities should be required to add a 5% buffer to their 5-year housing land supply calculations?</p>	<p>Yes, subject to the answer to Q.10.</p>
<p>Question 10</p> <p>If yes, do you agree that 5% is an appropriate buffer, or should it be a different figure?</p>	<p>Given the small numbers involved, the endemic shortage of accommodation, and the many very poor needs assessments, we can see merit in using a higher figure, at least until local planning authorities have sound local plans based on up to date and robust assessment of needs prepared</p>

	<p>in accordance with new guidance on preparing such assessments.</p>
<p>Question 12</p> <p>Do you agree that the NPPF should be amended to further support effective co-operation on cross boundary and strategic planning matters?</p>	<p>We welcome the intention to introduce legislation to reintroduce a strategic, above local, dimension to planning.</p> <p>At para 3.21 we suggest that strategic authorities should have comprehensive responsibility for Gypsies & Traveller provision and needs, including in regard to accommodation needs assessments, spatial strategy towards new site provision, provision of transit sites, site development (including in regard to self-build / equity share sites), and site management.</p>
<p>Question 14</p> <p>Do you have any other suggestions relating to the proposals in this chapter? (Chapter 3 – Planning for the homes we need)</p>	<p>The Wenman decision (Wenman v-SSCLG [2015] EWHC 925 (Admin), 21 April 2015) determined that housing includes mobile homes.</p> <p>Through the National Planning Policy Framework: technical adjustment: Written statement - HLWS167 of 22 July 2025 the Government responded to the Wenman decision by making it</p>

	<p>clear that the judgement did not apply to Travellers.</p> <p>The policy framework needs to recognise that provision of mobile homes and caravans to meet residential needs of Travellers is a form of housing. To reflect this the post Wenman ministerial statement needs to be reversed.</p> <p>One of the consequences of the failure of local authorities to plan for and allow adequate provision has been the costs of enforcement against unauthorised encampments. We suggest that where there is a lack of a five year supply of sites and of transit sites, that the costs of enforcement, which are a direct consequence of that failure, should be deducted from the following year's central government funding to the local authority.</p>
<p>Question 19</p> <p>Do you have any additional comments on the proposed method for assessing housing needs?</p>	<p>Only that if we are going to have robust assessments of Gypsy and Traveller accommodation needs it is essential that updated guidance on their production is provided.</p>
<p>Question 23</p>	

<p>Do you agree with our proposed definition of grey belt land? If not, what changes would you recommend?</p>	<p>The types of uses proposed to be included within the definition are exactly the types of land within Green Belts that Gypsies and Travellers have sometimes been able to acquire. This confirms our anxieties at paras 3.22 and 3.23 that the policy will make it even harder for Gypsies and Travellers to develop enough sites in Green Belts.</p> <p>We are unable to make any suggestions about how the definition could be amended to mitigate this.</p> <p>It makes it more urgent that Local Plans are required to make adequate allocations for Gypsies and Travellers.</p> <p>Reflecting how hopeless local planning authorities are in identifying sites, we would recommend to MHCLG that it commissions good practice guidance on the identification of sites.</p> <p>.</p>
<p>Question 32</p> <p>Do you have views on whether the approach to the release of Green Belt through plan and decision-making should apply to traveller sites, including the</p>	<p>Yes definitely.</p> <p>Without this kind of approach, it is difficult to see how Gypsy and Traveller needs will be met in Green Belt areas. Indeed, by making it clear that the policy will be applied to any shortage of Gypsy and Traveller sites</p>

<p>sequential test for land release and the definition of PDL?</p>	<p>may help focus local planning authorities' minds on the need to make adequate provision.</p> <p>We would also comment that Gypsies have traditionally always lived in countryside locations, not least in the arc of counties around London, and the issues we have identified about Green Belt sites being lost to Gypsies and Travellers will tend to push Gypsy and Traveller sites down the hierarchy to the 'other sustainable Green Belt locations' at para 144.</p>
<p>Question 33</p> <p>Do you have views on how the assessment of need for traveller sites should be approached, in order to determine whether a local planning authority should undertake a Green Belt review?</p>	<p>Policy failure in regard to provision for Gypsies and Travellers should be taken into account in determining whether a Green Belt review is required both through contributing to the justification for a review which also addresses wider needs, or on its own.</p> <p>Factors to be taken into account in determining whether a Green Belt review is required should include the failure to make adequate provision, particularly if that failure has existed over an extended period, a pattern of appeal decisions allowing Gypsy and Traveller development in Green Belt, not having adequate or any social rented sites, and not having any or</p>

	adequate transit sites or stopping places.
<p>Question 34</p> <p>Do you agree with our proposed approach to the affordable housing tenure mix?</p>	<p>The policy should make clear that affordable housing includes social rented Gypsy and Traveller sites, pitches on transit sites, and pitches on self-build sites (see para 3.19).</p>
<p>Question 42</p> <p>Do you have a view on how golden rules might apply to non-residential development, including commercial development, travellers sites and types of development already considered 'not inappropriate' in the Green Belt?</p>	<p>The question is badly framed, since it implies that Gypsy and Traveller sites are non-residential development.</p>
<p>Question 47</p> <p>Do you agree with setting the expectation that local planning authorities should consider the particular needs of those who require Social Rent when undertaking needs assessments and setting policies on affordable housing requirements?</p>	<p>Yes, in regard to Gypsy & Traveller accommodation needs assessments.</p>

<p>Question 51</p> <p>Do you agree with introducing a policy to promote developments that have a mix of tenures and types?</p>	<p>Yes, in regard to Gypsy & Traveller accommodation.</p>
<p>Question 54</p> <p>What measures should we consider to better support and increase rural affordable housing?</p>	<p>Social rented Gypsy and Traveller sites, pitches on transit sites, and pitches on self-build sites should be specifically included within rural exception sites</p>
<p>Question 59</p> <p>Do you agree with the proposals to retain references to well-designed buildings and places, but remove references to 'beauty' and 'beautiful' and to amend paragraph 138 of the existing Framework?</p>	<p>References to "well-designed" should include "culturally appropriate" as a component of the human right to adequate housing.</p> <p>Also, it is shocking that the definition of "well-designed" does not mention accessibility for people with different types of disability. This should include accessibility for people physical disabilities and with invisible needs, such as sensory impairments and autism spectrum disorders that require protection from, for example, noise pollution, and resting places for people with long Covid and other chronic illnesses.</p>

<p>Question 70</p> <p>How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?</p>	<p>Reflecting the tradition of locating Gypsy and Traveller sites in places which would have been unacceptable for others, more than 50% are located within 100m of major pollutants.</p> <p>Environmental health factors should be taken into account in regard to Gypsy and Traveller sites in the same way as for other residential accommodation.</p> <p>In planning for Gypsy and Traveller accommodation needs, the health and safety issues of sites which are located in proximity to major pollutants should be addressed, either by improvements in situ, or by relocating the sites to locations which support the residents health & safety.</p>

Michael Hargreaves, MH Planning
September 2024