



HOUSE OF COMMONS
LONDON, SW1A 0AA

Planning Policy Consultation Team
Ministry of Housing, Communities and Local Government
3rd floor, South East
Fry Building
2 Marsham Street
LONDON
SW1P 4DF

10 May 2018

Dear Sir or Madam

Re: National Planning Policy Framework Consultation.

We are writing as co-chairs of the All-Party Parliamentary Group for Gypsies, Travellers and Roma.

We are pleased to see that the Housing Delivery Test will include Traveller sites, as delivery on Traveller sites is even slower than that on housing, and we presume that the action plans mentioned in point 77 of Chapter 5, which will examine the causes of under delivery and identify actions to increase delivery, will include Traveller sites.

Delivery on Traveller sites is extremely slow, and the requirement under PPTS (Planning Policy for Traveller Sites) for local authorities to allocate a five year supply of land for Traveller sites is not currently being monitored by central government, so the Housing Delivery Test will results will be very helpful.

Gypsy and Traveller organisations carried out their own research in 2016 (in 4 of the 9 English regions) into whether local authorities were complying with the requirement to allocate a five year supply of land for sites. The results were as follows:

Friends, Families and Travellers found that in the South East, only 10 out of 66 local authorities had allocated a five year supply of land.

The London Gypsy and Traveller Unit found that in London only five out of the 32 London boroughs had allocated a five year supply of land.

The National Federation of Gypsy Liaison Groups found that in the East and West Midlands only 15 out of 70 local authorities had allocated a five year supply of land.

Point 62 of Chapter Five 'Delivering a wide choice of high quality homes' references assessing the needs of Travellers who do not meet the definition of 'Traveller' in 'Planning Policy for Traveller Sites'. We feel it does not make sense to have two definitions of

Traveller and that it is not the best use of local authorities' time doing two assessments of Travellers' accommodation needs, when the end result in type of accommodation to be allocated (caravan sites) is the same. It would be better to have a more all-encompassing definition of Traveller, such as that in the draft London Plan, or in the Housing Act 2004.

Question 41 of the 'Transitional arrangements and consequential changes' chapter asks if any changes should be made to the Planning Policy for Traveller Sites as a result of the proposed changes to the Framework set out in the consultation document? If so, what changes should be made?

We think that this is the ideal opportunity to amend the definition of Traveller in Planning Policy for Traveller Sites (PPTS) which is not workable and is discriminatory and has been objected to by a wide range of organisations including the Equalities and Human Rights Commission.

The current definition is discriminatory as it excludes Gypsies and Travellers who have been travelling all their life, but are no longer able to do so due to ill health or old age. It is also much harder to travel now as there is a huge lack of transit and permanent sites to stop on, and a high level of evictions against encampments, making it impossible for many to travel as there is nowhere to stop when travelling. The current draft London plan has a definition of Gypsy/Traveller which is more sensible and could replace the current PPTS definition: 'People with a cultural tradition of nomadism, or living in a caravan, whatever their race or origin, including: 1) those who are currently travelling or living in a caravan, 2) those who currently live in bricks and mortar dwelling households whose existing accommodation is unsuitable for them by virtue of their cultural preference not to live in bricks and mortar accommodation, 3) those who, on grounds of their own or their family's or dependants' educational or health needs or old age, have ceased to travel temporarily or permanently'.

An unintended consequence of the change to the definition of Traveller in PPTS in 2015 is that it has resulted in an increase in unauthorised encampments as Travellers have to travel around more in order to prove their status as travelling Travellers, but with the lack of sites there is nowhere authorised for them to stop.

We are sure this was not the government's intention with PPTS, indeed the current consultation on unauthorised encampments and eviction powers would indicate that they would like a reduction in this. A change in the PPTS definition would allow this to happen.

We would suggest replacing the current PPTS definition with one similar or in line with that in the draft London Plan.

Yours sincerely

The image shows two handwritten signatures in blue ink. The signature on the left is 'Janet Whitaker' and the signature on the right is 'Kate Green'.

Baroness Janet Whitaker and Kate Green MP
Co-Chairs All Party Group for Gypsies, Travellers and Roma