

## London Gypsies and Travellers' response to proposed reforms to the National Planning Policy Framework (NPPF) and other changes to the planning system

Report compiled by:

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- The social and policy context
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### Main recommendations for reforms to the system:

London Gypsies and Travellers has supported community members' campaign for equal rights and access to adequate housing since 1982. There are some 40,000 Gypsies and Travellers living in London, and they face multiple devastating challenges.<sup>1</sup> In the context of Gypsy and Traveller social exclusion, members of these communities suffer suicide rates many times higher than the national average.<sup>2</sup> London Gypsies and Travellers proposes that resolving the shortage of adequate and culturally suitable accommodation adjusted to nomadic life is the keystone for building a path out of decades of neglect and discrimination. Our vision is of London where Gypsies and Travellers can pursue the culture of nomadism in manifold ways and where Gypsies and Travellers will be welcomed as neighbours with equal chances in life. To achieve this vision:

- **The national policy must set regional targets that prioritize the provision of social rented accommodation. The London target should be that 35% of all accommodation be socially rented, of which 1% be culturally suitable for people with a heritage of nomadism, so as to achieve a diverse mix of tenures and inclusive communities;**
- The method for assessing Gypsy and Traveller accommodation needs should be standardised across all government authorities with regular updates to reflect good practice, such as using the Welsh definition of Gypsies, Travellers and other people with nomadic cultures;<sup>3</sup>
- **The NPPF should integrate positive elements of the Planning Policy for Traveller Sites into a single policy that assigns to regional authorities the duty to provide new sites; and no evictions from substandard or unsuitable accommodation should be enforced before relocation sites are ready;**
- "Well-designed" housing should include specific mention of spaces that are culturally suitable, including for Gypsies and Travellers, and that are accessible to people with all different types of disabilities, including autism spectrum and sensory disorders;
- **Transit sites and stopping places should be integral to planning infrastructure and accommodation adjusted for nomadism.**

**The social and policy context:**

Gypsies, Roma and Travellers are members of recognised ethnic groups which are protected from racial discrimination under the Equality Act 2010. These ethnic groups (Gypsies, Roma and Travellers being in themselves umbrella terms for a number of groups) share a protected characteristic, which is a culture and heritage of nomadism, legally recognized in 2020 in the judgment that the “Gypsy and Traveller community have an enshrined freedom not to stay in one place but to move from one place to another” (*Bromley LBC v Persons Unknown, London Gypsies and Travellers and Others [2020]*, para 109). Nomadism is a lawful activity, and its exercise and expression are protected by human rights legislation as part of Gypsies and Travellers’ right to private and family life (Article 8 of the *Human Rights Act 1998* (HRA)), and to protection from discrimination (Article 14 of HRA), which relates to the NPPF in terms of the provision of adequate housing (Article 11(1) of the *International Covenant on Economic, Social and Cultural Rights*). One aspect of adequacy is that the accommodation be culturally appropriate (UN Committee on Economic, Social and Cultural Rights, *General Comment 4*, para 8(g)). **The reform of the NPPF is an opportunity to fix systemic discrimination.**

The housing crisis in London is a result of accumulated policies that give rise to discrimination against racially minoritized groups in general, and against Gypsies and Travellers in particular. The Office for National Statistics analysed in 2023 that Gypsies and Travellers are more than twice as likely than the national average to live in accommodation rented from local authorities.<sup>4</sup> Of the 1,264 Gypsy and Traveller households who live on caravan pitches in London, 655 are tenants in 35 sites provided by local authorities.<sup>5</sup> For one in 50 Londoners, and members of racially minoritized groups disproportionately,<sup>6</sup> rising rents, the cost of living, and the lack of social housing has led to statutory homelessness.<sup>7</sup> Additionally, data for London shows that Black African, Caribbean, White Other, Roma and Gypsy Traveller groups [sic] are all more likely to be sleeping rough.<sup>8</sup> Gypsies and Travellers in London have the highest percentage of households suffering from overcrowding.<sup>9</sup> **The context for all these forms of homelessness is a chronic under-supply of Gypsy and Traveller sites.**

The last assessment of the housing needs of Gypsies and Travellers living in London was published in 2008.<sup>10</sup> It found then that 1,626 Gypsy and Traveller households required a pitch on specialized sites to be provided by the local authorities in 2007-2017 because they were living in overcrowded conditions or in culturally inappropriate housing.<sup>11</sup> No additional site has been built since 1996. The same assessment identified the need for 40 transit pitches in London,<sup>12</sup> yet **there is still no provision for nomadic Gypsy and Traveller families.**<sup>13</sup>

Most of the local authority sites in London lack basic amenities such as rainwater drainage, road maintenance, communal and green spaces, and regulation of noise and air pollution.<sup>14</sup> Environmental racism, whereby accommodation for minoritized groups is situated in polluted environments that damage their health, has been researched with regards to Gypsies and Travellers in the United Kingdom: **of 291 sites provided by local authorities, 54% were found to be within 100 metres of major pollutants.**<sup>15</sup>

**London Gypsies and Travellers' answers to relevant consultation questions:**

The organization's experience in London is that the separate Planning Policy for Traveller Sites has provided an excuse for local authorities to neglect the accommodation needs of Gypsies and Travellers. Local Plans have been found sound, as they conformed with the NPPF, without addressing the needs of Gypsies and Travellers, whose plans were postponed to an intended modification, later consideration, and left inoperative.<sup>16</sup>

In general, the separation of policies that focus on Gypsies and Travellers has not resulted in fair and equal treatment of Gypsies and Travellers. The only local authority in London to utilize the government's Traveller Site Fund was Kensington and Chelsea, which spent £78,909 in 2022 on refurbishing a communal space at the Stable Way Traveller Site, while £485,000 of the funds were not spent at all.<sup>17</sup> Stable Way Site is overcrowded, wedged under a dual carriageway overpass where seven major roads and a railway line intersect.<sup>18</sup>

Since the duty to provide Gypsy and Traveller pitches, as stipulated in the Caravan Sites Act 1968,<sup>19</sup> was abolished in 1994, there has been no way to enforce policies and plans that purport to focus on the needs of Gypsies and Travellers.

Nevertheless, specific clauses of the Planning Policy for Traveller Sites are positive, particularly those that mention consultation with the affected population.<sup>20</sup> London Gypsies and Travellers argues that these clauses should be integrated into the NPPF, and that they are beneficial beyond Gypsy and Traveller communities as well. In particular, these clauses could be transferred, resulting in a single planning policy with a chapter on specialist housing, including accommodation that is culturally appropriate for Gypsies and Travellers and other people with a culture and heritage of nomadism, whose ethnic identity should be recognised in the use of capital letters for their preferred self-identification:

Policy A: Using evidence to plan positively and manage development

7. In assembling the evidence base necessary to support their planning approach, local [and regional] planning authorities should:

- a) pay particular attention to early and effective community engagement with both settled and [Gypsy and T]raveller communities (including discussing [Gypsies and T]ravellers' accommodation needs with [Gypsies and T]ravellers themselves, their representative bodies and local support groups)
- b) cooperate with [Gypsies and T]ravellers, their representative bodies and local support groups; other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of the likely permanent and transit accommodation needs of their areas over the lifespan of their development plan, working collaboratively with neighbouring local planning authorities
- c) use a robust evidence base to establish accommodation needs to inform the preparation of local plans and make planning decisions *[additions by London Gypsies and Travellers]*.

We also encourage the integration of Planning Policy for Traveller Sites's clauses on sustainability, subject to updates that task regional authorities with a duty to provide sites, into the NPPF, in particular:

Policy B: Planning for [Gypsy and T]raveller sites, paragraph 13:

13. Local [and regional] planning authorities should ensure that [Gypsy and T]raveller sites are sustainable economically, socially and environmentally. Local [and regional] planning authorities should, therefore, ensure that their policies:

- a) promote peaceful and integrated co-existence between the site and the local community
- b) promote, in collaboration with commissioners of health services, access to appropriate health services
- c) ensure that children can attend school on a regular basis
- d) provide a settled base that reduces both the need for long-distance travelling and possible environmental damage caused by unauthorised encampment
- e) provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well-being of any travellers that may locate there or on others as a result of new development
- f) avoid placing undue pressure on local infrastructure and services
- g) do not locate sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans
- h) reflect the extent to which traditional lifestyles (whereby some [Gypsies and T]ravellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability *[additions by London Gypsies and Travellers]*.<sup>21</sup>

See below for London Gypsies and Travellers responses to specific questions.

**Question 7**

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?

Yes, para 77 needs to include specific reference to maintaining a supply of Gypsy and Traveller pitches in accordance with an up to date and robust assessment of needs prepared in accordance with standardised new guidance on preparing such assessments based on the Welsh definition of Gypsies and Travellers:

Gypsies and Travellers means:

- (a) Persons of a nomadic habit of life, whatever their race or origin, including –
  - (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 show people 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.

N.B. The intention of the above definition is to ensure that ethnic Romani Gypsies and Irish Travellers are included, as well as those from any ethnic group who follow a nomadic habit of life. Members of these communities do not necessarily need to demonstrate a continued nomadic habit of life to be considered to be Gypsies or Travellers.<sup>22</sup>

<p><b>Question 9</b> 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><b>Question 10</b> 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 target provision in line with the national census statistics that indicate that 0.1% of the population of England is Gypsy and Traveller, even though this statistic is likely to be an underestimate. Targets should be in place at least until local and regional planning authorities have sound local plans based on up to date and robust assessment of Gypsy and Traveller accommodation needs prepared in accordance with new guidance on preparing such assessments.</p>
<p><b>Question 12</b> 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 &amp; 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><b>Question 14</b> 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 2015 the Government responded to the Wenman decision by making it clear that the judgement did not apply to Travellers – this needs to be reversed, so that the NPPF can recognise that provision of mobile homes and caravans to meet residential needs of Travellers is a form of housing.</p>

<p><b>Question 19</b> 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><b>Question 23</b> 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 of grey belt are exactly the types of land within Green Belts that Gypsies and Travellers have sometimes been able to acquire. The policy should reinstate the duty to provide accommodation that is culturally suitable for Gypsies and Travellers, with particular note that this type of accommodation does not impact significantly on the Green Belt, and can contribute to maintaining green landscapes. Therefore, applications for land release in the Green Belt should make it easier for exceptions to be made for Gypsy and Traveller sites, and permits for Gypsy and Traveller site developments should not be transferrable to other types of development.</p>
<p><b>Question 32</b> 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 sequential test for land release and the definition of PDL?</p>	<p>Gypsy and Traveller sites are almost never “major developments” (over 1ha) and therefore have little impact on the Green Belt and do not need to prove that they meet the proposed “Golden Rules”. However, we think NPPF should prioritise the direct provision of social rented accommodation including socially provided sites. Where there is an identified need for socially provided sites, this should be met through direct provision rather than through site allocations. In areas constrained by Green Belt, national policy should be amended to state that the need for socially provided sites is capable of outweighing the harm to the Green Belt, so as to enable release of appropriate land.</p>



<p><b>Question 33</b></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>We would like national policy to guide local and regional plans by integrating provision of Gypsy and Traveller sites into local plans from the outset, as a test of soundness for the inspection. There are multiple examples of where local plans were found to be sound without the need of Gypsies and Travellers having been met.</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 adequate transit sites or stopping places.</p>
<p><b>Question 34</b></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). We would suggest that the test of soundness at inspection also explicitly includes the need for targets for socially rented accommodation, set regionally, envisioning a mixture of tenures, for instance in London, with 35% socially rented accommodation.</p>
<p><b>Question 42</b></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><b>Question 47</b> 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>The NPPF should set regional targets that prioritize the provision of social rented accommodation. The London target should be that 35% of all accommodation be socially rented, of which 1% be culturally suitable for people with a heritage of nomadism, so as to achieve a diverse mix of tenures and inclusive communities. With regards to Gypsy &amp; Traveller accommodation needs assessments, the research should investigate the mixture of tenures including social rented accommodation.</p>
<p><b>Question 51</b> Do you agree with introducing a policy to promote developments that have a mix of tenures and types?</p>	<p>There should be a focus on provision of social rented accommodation that is ringfenced by regional targets.</p>
<p><b>Question 54</b> 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><b>Question 59</b> 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><b>Question 70</b> How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?</p>	<p>Gypsies and Travellers have statistically the worst health outcomes of any minoritized group in the UK.<sup>23</sup> Poor accommodation contributes to ill-health. Most Gypsy and Traveller sites are located in places which would have been unacceptable for others, more than 50% are located within 100m of major pollutants.</p>

**Question 70 (cont'd)**

How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?

For example, Bashley Road Site in west London is located within an industrial estate and next to a highspeed railway construction site; the resulting intolerable levels of air and noise pollution rendered the site “not fit for purpose”.<sup>24</sup> The government-appointed railway construction company held a public meeting in 2021 at which it explained that it would suppress the dust for the benefit of its workers but not for the Traveller residents.<sup>25</sup> The Old Willow Close Site in east London is delineated by a triangle between three train lines, and consequently subjected to constant loud railway noise, and Trewint Street Caravan Site in south London is situated immediately adjacent to a waste disposal facility.<sup>26</sup>

This pattern of locations would not be acceptable to any other community, and represents systemic discrimination contrary to Articles 8 and 14 of the European Convention of Human Rights. Environmental health factors should be taken into account in regard to Gypsy and Traveller sites in the same way as for other residential accommodation, without discrimination.

It is important that the health and safety issues of such sites are addressed, either by improvements in situ, or by relocating the sites to locations which support the residents’ health & safety.

This then has implications for the accommodation needs assessments of our earlier submissions. The guidance on assessments of needs, which we indicate is required, should include reference to the need to include provision for the relocation of those public and private Gypsy and Traveller sites located in close proximity to major pollutants harmful to the health and safety of the occupants, where the issues cannot be addressed in situ. No evictions should take place from substandard sites before the improved accommodation is ready.

**Question 81**

Do you have any other comments on actions that can be taken through planning to address climate change?

Gypsy and Traveller sites entail a potentially small carbon footprint, however the Gypsy and Traveller residents are some of the most exposed to climatic change. Practical features can mitigate the effects of climate change, and should be planned for (e.g. trees on sites for shading, local clean water provision and treatment, solar panels, green roofs). The planting of trees and meadows on and around Gypsy and Traveller sites, together with species habitats such as protected wildlife paths and “highways” would increase local biodiversity and facilitate education on environmental issues.

**Endnotes**

<sup>1</sup> Office for National Statistics, *Gypsies’ and Travellers’ lived experiences, overview, England and Wales: 2022*, 7 December 2022, <https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/ethnicity/articles/gypsiesandtravellerslivedexperiencesoverviewenglandandwales/2022> accessed 25 June 2024.

<sup>2</sup> NHS Race and Health Observatory, *Inequalities in Mental Health Care for Gypsy, Roma, and Traveller Communities*, report, September 2023, <https://www.nhs.uk/wp-content/uploads/2023/05/Inequalities-in-mental-health-care-for-Gypsy-Roma-and-Traveller-communities.pdf> accessed 25 June 2024.

<sup>3</sup> “Gypsies and Travellers means:

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

(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 show people 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. The intention of the above definition is to ensure that ethnic Romani Gypsies and Irish Travellers are included, as well as those from any ethnic group who follow a nomadic habit of life. Members of these communities do not necessarily need to demonstrate a continued nomadic habit of life to be considered to be Gypsies or Travellers,” Welsh Government, Circular 005/2018, June 2018, <https://www.gov.wales/sites/default/files/publications/2019-05/planning-for-gypsy-traveller-and-showpeople-sites-wgc-0052018.pdf>, p.1, accessed 24 September 2024.

<sup>4</sup> 42.3% of Gypsies and Travellers live in socially rented accommodation compared with the 16.6% national average, Office for National Statistics, *Gypsy or Irish Traveller populations, England and Wales: Census 2021*, 13 October 2023, <https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/ethnicity/articles/gypsyoririshtravellerpopulationsenglandandwales/census2021> accessed 10 June 2024.

<sup>5</sup> Department for Levelling Up, Housing and Communities, *Official Statistics: Traveller caravan count: January 2024*, 5 June 2024, <https://www.gov.uk/government/statistics/traveller-caravan-count-january-2024> accessed 10 June 2024.

<sup>6</sup> Joseph Rowntree Foundation, *What’s causing structural racism in housing?*, <https://www.jrf.org.uk/housing/whats-causing-structural-racism-in-housing>, p.4, accessed 10 June 2024.

<sup>7</sup> London Assembly Housing Committee, *Temporary Accommodation – written evidence submitted in Sep-Oct 2023*, October 2023, <https://www.london.gov.uk/media/105211/download> (PDF download), p.34, accessed 10 June 2024.

- <sup>8</sup> Centre for Homelessness Impact, *Ethnic inequalities and homelessness in the UK*, December 2022, [https://assets-global.website-files.com/59f07e67422cdf0001904c14/63e6476b4d417106be76eae5\\_CHI.Ethnic.Inequalities.homelessness.pdf](https://assets-global.website-files.com/59f07e67422cdf0001904c14/63e6476b4d417106be76eae5_CHI.Ethnic.Inequalities.homelessness.pdf), p.23, accessed 10 June 2024.
- <sup>9</sup> 32.6% of Gypsies and Travellers live in overcrowded conditions in contrast to a 19.6% average for London, Office for National Statistics, *Gypsy or Irish Traveller populations, England and Wales: Census 2021*, previously cited, accessed 10 June 2024.
- <sup>10</sup> Greater London Authority, *London Boroughs' Gypsy and Traveller Accommodation Needs Assessment (GTANA)*, March 2008, [https://www.london.gov.uk/sites/default/files/london\\_boroughs\\_gypsy\\_and\\_traveller\\_accommodation\\_needs\\_assessment\\_-\\_final\\_report\\_-\\_2008\\_-\\_fordham\\_research.pdf](https://www.london.gov.uk/sites/default/files/london_boroughs_gypsy_and_traveller_accommodation_needs_assessment_-_final_report_-_2008_-_fordham_research.pdf) accessed 10 June 2024.
- <sup>11</sup> Greater London Authority, *London Boroughs' 2008 GTANA*, previously cited, p.162.
- <sup>12</sup> Greater London Authority, *London Boroughs' 2008 GTANA*, previously cited, p.8.
- <sup>13</sup> In January 2024, 377 Gypsy and Traveller caravans were standing on unauthorized sites in London, risking eviction, criminalisation and confiscation of their homes, Department for Levelling Up, Housing and Communities, *Traveller caravan count: January 2024*, previously cited.
- <sup>14</sup> Details on file with London Gypsies and Travellers.
- <sup>15</sup> Alice Bloch and Katharine Quarmbay, Environmental racism, segregation and discrimination: Gypsy and Traveller sites in Great Britain, *Critical Social Policy Journal*, 2024, <https://doi.org/10.1177/02610183241229053> accessed 25 June 2024.
- <sup>16</sup> Several London boroughs are currently in the situation of having a "sound" Local Plan that provides no specific accommodation for Gypsies and Travellers such as Islington, see the Planning Inspectorate, *Report to the London Borough of Islington*, 5 July 2023, <https://www.islington.gov.uk/-/media/sharepoint-lists/public-records/planningandbuildingcontrol/publicity/publicconsultation/20232024/islington-local-plan-inspectors-report-july-2023.pdf?>, paras 67-68; and also Southwark, see the Planning Inspectorate, *Report to the Council of the London Borough of Southwark*, 17 November 2021, <https://www.southwark.gov.uk/assets/attach/73553/Southwark-Local-Plan-Inspectors-Report.pdf> [opens PDF], para 94; and Brent, see the Planning Inspectorate, *Report to the London Borough of Brent Council*, 17 January 2022, [https://legacy.brent.gov.uk/media/16419965/1\\_brent-lp-inspectors-report-final.pdf](https://legacy.brent.gov.uk/media/16419965/1_brent-lp-inspectors-report-final.pdf), paras 71-72; all accessed 24 September 2024.
- <sup>17</sup> Department for Levelling Up, Housing and Communities, *Traveller Site Fund 2022/23*, updated 15 June 2023, <https://www.gov.uk/government/collections/traveller-site-fund-202223> accessed 25 June 2024.
- <sup>18</sup> Simon Ruston, *Hearing statement – Gypsies and Travellers – On behalf of the Stable Way Residents / Kensington and Chelsea Social Council*, 12 July 2023, <https://planningconsult.rbkc.gov.uk/gf2.ti/f/1479298/168883685.1/PDF/-/M5-3b.pdf> accessed 26 June 2024.
- <sup>19</sup> UK Legislation, *Caravan Sites Act 1968*, as amended, Part II "Gypsy Encampments: Provision by local authorities", <https://www.legislation.gov.uk/ukpga/1968/52/part/II/1991-08-28>, accessed 24 September 2024.
- <sup>20</sup> Ministry of Housing, Communities and Local Government, *Planning Policy for Traveller Sites*, <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites/planning-policy-for-traveller-sites>, published March 2012 and updated 19 December 2023, Chapter 2 "Using Evidence", accessed on 23 September 2024.
- <sup>21</sup> Ministry of Housing, Communities and Local Government, *Planning Policy for Traveller Sites*, previously cited, Chapter 3 "Plan-making", accessed 24 September 2024.
- <sup>22</sup> Welsh Government, Circular 005/2018, previously cited.
- <sup>23</sup> Office for National Statistics, *Gypsies' and Travellers' lived experiences, overview, England and Wales: 2022*, previously cited.
- <sup>24</sup> Opinion Research Services, *West London Alliance Gypsy, Traveller and Travelling Showpeople Accommodation Assessment*, October 2018, [https://www.ealing.gov.uk/download/downloads/id/18373/west\\_london\\_alliance\\_gypsy\\_traveller\\_and\\_travelling\\_showpeople\\_accommodation\\_assessment\\_october\\_2018.pdf](https://www.ealing.gov.uk/download/downloads/id/18373/west_london_alliance_gypsy_traveller_and_travelling_showpeople_accommodation_assessment_october_2018.pdf), p.42, accessed 25 June 2024.
- <sup>25</sup> HS2, *Community meeting – Noise, Dust, Vibration Event*, 11 May 2021, <https://assets.hs2.org.uk/wp-content/uploads/2021/09/QA-with-responses-Noise-Dust-Vibration-Event-FINAL.pdf> accessed 25 June 2024.
- <sup>26</sup> As observed and noted on repeated London Gypsy and Traveller staff site visits, most recently in May 2024.