

Public Document Pack



Neuadd y Sir
Y Rhadyr
Brynbuga
NP15 1GA

County Hall
Rhadyr
Usk
NP15 1GA

Thursday, 31 December 2015

Notice of meeting / Hysbysiad o gyfarfod:

Strong Communities Select Committee

**Monday, 11th January, 2016 at 10.00 am,
Council Chamber, County Hall, The Rhadyr, Usk, NP15 1GA**

Please note that a pre meeting will be held 30 minutes before the start of the meeting for members of the committee.

AGENDA

Item No	Item	Pages
1.	Apologies for absence	
2.	Declarations of Interest	
3.	Gypsy and Traveller Assessment Discussion paper on the Gypsy and Traveller Needs Assessment in Monmouthshire.	1 - 114
4.	Pollinator Policy Review of Policy's progress one year post-implementation, together with highway verge maintenance.	115 - 118
5.	Date and time of next meeting Strong Communities Select Committee <ul style="list-style-type: none">Thursday 28th January at 10am	

Paul Matthews

Chief Executive / Prif Weithredwr

MONMOUTHSHIRE COUNTY COUNCIL
CYNGOR SIR FYNWY

THE CONSTITUTION OF THE COMMITTEE IS AS FOLLOWS:

County Councillors:

S. Howarth
V. Smith
D. Dovey
A. Easson
S. Jones
P. Jordan
A. Webb
S. White
K. Williams

Public Information

Access to paper copies of agendas and reports

A copy of this agenda and relevant reports can be made available to members of the public attending a meeting by requesting a copy from Democratic Services on 01633 644219. Please note that we must receive 24 hours notice prior to the meeting in order to provide you with a hard copy of this agenda.

Watch this meeting online

This meeting can be viewed online either live or following the meeting by visiting www.monmouthshire.gov.uk or by visiting our Youtube page by searching MonmouthshireCC.

Welsh Language

The Council welcomes contributions from members of the public through the medium of Welsh or English. We respectfully ask that you provide us with adequate notice to accommodate your needs.

Aims and Values of Monmouthshire County Council

Sustainable and Resilient Communities

Outcomes we are working towards

Nobody Is Left Behind

- Older people are able to live their good life
- People have access to appropriate and affordable housing
- People have good access and mobility

People Are Confident, Capable and Involved

- People's lives are not affected by alcohol and drug misuse
- Families are supported
- People feel safe

Our County Thrives

- Business and enterprise
- People have access to practical and flexible learning
- People protect and enhance the environment

Our priorities

- Schools
- Protection of vulnerable people
- Supporting Business and Job Creation
- Maintaining locally accessible services

Our Values

- **Openness:** we aspire to be open and honest to develop trusting relationships.
- **Fairness:** we aspire to provide fair choice, opportunities and experiences and become an organisation built on mutual respect.
- **Flexibility:** we aspire to be flexible in our thinking and action to become an effective and efficient organisation.
- **Teamwork:** we aspire to work together to share our successes and failures by building on our strengths and supporting one another to achieve our goals.

Nodau a Gwerthoedd Cyngor Sir Fynwy

Cymunedau Cynaliadwy a Chryf

Canlyniadau y gweithiwn i'w cyflawni

Neb yn cael ei adael ar ôl

- Gall pobl hŷn fyw bywyd da
- Pobl â mynediad i dai addas a fforddiadwy
- Pobl â mynediad a symudedd da

Pobl yn hyderus, galluog ac yn cymryd rhan

- Camddefnyddio alcohol a chyffuriau ddim yn effeithio ar fywydau pobl
- Teuluoedd yn cael eu cefnogi
- Pobl yn teimlo'n ddiogel

Ein sir yn ffynnu

- Busnes a menter
- Pobl â mynediad i ddysgu ymarferol a hyblyg
- Pobl yn diogelu ac yn cyfoethogi'r amgylchedd

Ein blaenoriaethau

- Ysgolion
- Diogelu pobl agored i niwed
- Cefnogi busnes a chreu swyddi
- Cynnal gwasanaethau sy'n hygyrch yn lleol

Ein gwerthoedd

- **Bod yn agored:** anelwn fod yn agored ac onest i ddatblygu perthnasoedd ymddiriedus
- **Tegwch:** anelwn ddarparu dewis teg, cyfleoedd a phrofiadau a dod yn sefydliad a adeiladwyd ar barch un at y llall.
- **Hyblygrwydd:** anelwn fod yn hyblyg yn ein syniadau a'n gweithredoedd i ddod yn sefydliad effeithlon ac effeithiol.
- **Gwaith tîm:** anelwn gydweithio i rannu ein llwyddiannau a'n methiannau drwy adeiladu ar ein cryfderau a chefnogi ein gilydd i gyflawni ein nodau.



SUBJECT:	Gypsy and Traveller Accommodation Assessment
MEETING:	Special Select
DATE:	11th January 2016
DIVISION/WARDS AFFECTED:	All

1. PURPOSE:

- 1.1 To provide information regarding the Monmouthshire Gypsy and Traveller Accommodation Needs Assessment (GTANA) undertaken by Housing and Communities.

2. RECOMMENDATIONS:

- 2.1 To note and provide observations on the recommendations of the Gypsy, Traveller and Showpersons Accommodation Assessment (GTAA) annexed to this report (Appendix 1).

3. KEY ISSUES:

- 3.1 Under Part 3 of the Housing (Wales) Act 2014, all local authorities must undertake a Gypsy & Traveller Accommodation Assessment and to make provision where assessments identify an unmet need for mobile home pitches (See Appendix 2).
- 3.2 The assessments were undertaken with reference to Welsh Government guidance document, 'Undertaking Gypsy & Traveller Accommodation Assessments' published in May 2015 (See Appendix 3).
- 3.3 All Local Authorities have until the 26th February 2016 to submit their assessments to the Welsh Government for scrutiny.
- 3.4 The purpose of the assessment is to inform the Council's LDP Annual Monitoring Report and the LDP Review Process to meet both current and future needs for Gypsy and Traveller sites.
- 3.5 The following provides a brief summary of the Assessment process, and its Findings. For a more detailed information please refer to the Assessment report.

3.5.1 Process:

- A Steering Group comprising of important key stakeholders and members of the Gypsy and Traveller community was formed to oversee the assessment process and its findings. The group had a number of responsibilities including:
 - Helping to identify households living within the community to contact and survey using the standard questionnaire contained in the Guidance.
 - To help scrutinise and provide feedback on the results:
 - To sign off the report to be submitted to Welsh Government.
- Household survey interviews were conducted between June and November 2015 by officers from Housing & Communities Service, with the assistance of the Regional Equalities Council's Gypsy & Traveller Liaison Officer. The Assessment's core findings, conclusions and recommendations are based on the answers to the questionnaire.

3.5.2 Findings:

- The Assessment identified a higher number of Gypsy & Traveller households in Monmouthshire than previous data sources indicated. 11 households were identified in total, 7 living in bricks and mortar and 4 in mobile accommodation.
- There is an estimated unmet need for eight pitches to 2021, based on overcrowding, unauthorised occupation and the likelihood of cultural aversion to conventional housing.
- A need for a transit site has not been identified due to the low number of unauthorised encampments in the County.
- A need for stopping place has been identified.
- A need for travelling Showpeople pitches has not been identified.
- There is an expectation that the Council should have a waiting list to allow Gypsy & Traveller households to register an interest in obtaining an authorised pitch for a mobile home, as well as for bricks and mortar accommodation
- A number of households within the community do not understand the Council's Planning Policy in relation to pitch provision.
- No additional households who wanted or needed to live in Monmouthshire have been drawn to the attention of the Council from other Welsh authorities
- Further consideration is given to amending current planning permission to allow lifetime occupation by additional named individuals in order to address identified unmet need

4. IMPLICATIONS

- 4.1 The Council will be in breach of its statutory duty should it fail to provide and submit a Gypsy and Traveller Assessment to the Welsh Government by the 26th February 2016.

5. REASONS:

- 5.1 To comply with its statutory duty under Part 3 of Housing (Wales) Act 2014

6. RESOURCE IMPLICATIONS:

6.1. Financial

Should the Council decide to develop site provision there could be a capital cost including land acquisition and provision of services. It is worth noting that Welsh Government grant assistance can be applied for to assist in meeting these costs; but these are limited and are subject to a bidding process.

7. SUSTAINABLE DEVELOPMENT AND EQUALITY IMPLICATIONS:

- 7.1 No implications have been identified in respect of this report. The Equalities Impact and Sustainable development assessments are attached (See Appendix 4).

7. SAFEGUARDING AND CORPORATE PARENTING IMPLICATIONS

There are no implications identified (See Appendix 4).

- 8. CONSULTEES:**
Planning
MCC Gypsy and Traveller Accommodation Assessment Steering Group
- 9. BACKGROUND PAPERS:**
Undertaking Gypsy & Traveller Accommodation Assessments' (May 2015)
Part 3 Housing (Wales) Act 2014
Gypsy and Traveller Assessment Report
- 10. AUTHOR:** Stephen Griffiths, Strategy & Policy Officer (Housing & Communities)
- 11. CONTACT DETAILS:**
Tel: 01633 644455
E-mail: stephengriffiths@monmouthshire.gov.uk

This page is intentionally left blank

MONMOUTHSHIRE COUNTY
COUNCIL
GYPSY AND TRAVELLER
ACCOMMODATION
ASSESSMENT

Contents

Forward	4
Introduction	5
Chapter One	7
1.0 Context	7
Background	7
Objective	7
Purpose	7
Local Development Plan & Planning Circulars	7
Definition of Key Terms	8
Statutory Guidance	8
Chapter Two	
2.0. Background and Analysis of Existing Data	10
Previous Gypsy and Traveller Accommodation Assessment Findings.	10
Population Data	10
Caravan Count	10
Current Accommodation Provision	11
Chapter Three	
3.0 Methodology	13
Project Steering Group	13
Study Methodology	14
Chapter 4	
4.0. Survey Findings	17
Households Interviews	17
Household Composition:	17
Household Ethnicity	18
Respondent by Age:	18
Suitability of Current Accommodation	19

Chapter Five

5.0 Assessing Accommodation Needs	20
Understanding 'Need' and 'Preferences'	20
Residential Unmet Need	20
Current Residential Supply	22
Planned Residential Supply	22
Current Residential Demand	23
Current Household and Future Residential Demand	24
Unmet Need	25
Transit Need	26

Chapter Six

6.0. Conclusions; Recommendations and Next Steps	27
Conclusions	27
Recommendations	27
Next Steps	28

Appendices

Appendix 1 – Part 3, Housing (Wales) Act 2014	29
Appendix 2 – Part 5, S56, Mobile Homes (Wales) Act 2013	32
Appendix 3 - LDP, Policy H8, Gypsy, Traveller and Travelling Showpeople Sites	33
Appendix 4 - Key Terms and Concepts	34

List of Tables

Table 1 – Welsh Government Checklist	14
Table 2 – Estimation of Need	21
Table 3 – Current Residential Supply	22
Table 4 – Planned Residential Supply	23
Table 5 - Planned Residential Demand	24
Table 6 – Current Households and Future Residential Demand	25
Table 7 –Unmet Need	26

List of Figures

Figure 1 - Unauthorised Encampments – Number of Occurrences by Month and Year	11
---	----

Figure 2 - Unauthorised Encampments – Number of Caravans by Month and Year	12
Figure 3 - Unauthorised Encampments - Duration of stay (Days) by Month and Year	12
Figure 4 – Accommodation at Time of Questionnaire	17
Figure 5 - Household Composition	18
Figure 6 – Household Ethnicity	18
Figure 7 – Respondent by Age Profile	19
Figure 8 - Suitability of Current Accommodation	19

Forward

To Be Completed

Introduction

This Gypsy & Accommodation Assessment has been completed under the Council's statutory duties relating to Part 3 of the Housing (Wales) Act 2014, which requires all local authorities in Wales to undertake a Gypsy & Traveller Accommodation Assessment and to make provision where assessments identify an unmet need for mobile home pitches.

This Assessment has been completed utilising the Welsh Government guidance document, 'Undertaking Gypsy & Traveller Accommodation Assessments' published in May 2015.

Although not a requirement of the Welsh Government Guidance, the Council was keen to utilise the Assessment as an opportunity to positively and proactively engage with Gypsy & Traveller households in Monmouthshire and to develop relationships with individual households and the local community as a whole. On this basis, the Council decided to implement the Assessment directly rather than appoint a partner agency to carry out the Assessment on its behalf.

The Assessment was overseen by a Monmouthshire multi-agency Steering Group under the co-ordination of the Council's Housing & Communities Service. The core findings, conclusions and recommendations of the Assessment are based on feedback collated between June and November 2015, through the interviewing of 19 Gypsy & Traveller households in Monmouthshire. The interviews were conducted by officers from Housing & Communities Service, with the assistance of the Regional Equalities Council Gypsy & Traveller Liaison Officer. To the knowledge of the Council, only one known Monmouthshire Gypsy & Traveller household (who declined to participate) has not contributed to this Assessment.

The summary conclusions of the Assessment are:

- The Assessment identified a higher number of Gypsy & Traveller households in Monmouthshire than previous data sources indicated. 11 households were identified in total, 7 living in bricks and mortar and 4 in mobile accommodation.
- There is an estimated unmet need for eight pitches to 2021, based on overcrowding, unauthorised occupation and the likelihood of cultural aversion to conventional housing.
- There is not a need for a transit site due to the low number of unauthorised encampments in the County.
- A need for stopping places has been identified.
- A need for travelling Showpeople yard has not been identified.
- There is an expectation that the Council should have a waiting list to allow Gypsy & Traveller households to register an interest in obtaining an authorised pitch for a mobile home, as well as for bricks and mortar accommodation
- A number of households within the community do not understand the Council's Planning Policy in relation to pitch provision.
- No additional households who wanted or needed to live in Monmouthshire have been drawn to the attention of the Council from other Welsh authorities
- Further consideration is given to amending current planning permission to allow lifetime occupation by additional named individuals in order to address identified unmet need

This Assessment, therefore, recommends

- The Council to conduct in-depth further assessments into the households identified by the assessment as having a likelihood of need based on cultural aversion.
- The Council establishes a pitch waiting list policy.
- The Council considers amending current planning permission to allow lifetime occupation by additional named individuals in order to address identified unmet need
- The Council works collaboratively with neighbouring local authorities to meet identified need for the development of additional temporary stopping places within the Gwent region;
- The Council organises an engagement event to enable Gypsy & Traveller households to find out more about the Council's planning policies and procedures so that the Community is able to seek planning advice on development opportunities prior to future land purchases.
- Mechanisms are established to enable effective engagement with both settled and Gypsy Traveller communities in relation to the identification of future potential sites.

Having been adopted by the Council, the next steps are to:

- Undertake more detailed assessment of those households identified through the assessment as having a likelihood of need based on cultural aversion by May 2016.
- Establish a waiting list and policy during 2016
- Engage with neighbouring Gwent authorities in respect of stop-over sites in liaison with WG
- Organise the Planning briefing session for Gypsy & Traveller households in the Spring 2016
- Inform the 2016 LDP Annual Monitoring Report (AMR) and subsequent LDP review process of the Assessments findings.

Chapter One

1.0 Context

1.1. Background

- 1.2. Part three of the Housing (Wales) Act 2014 placed number of statutory duties on local authorities to determine the accommodation needs of their Gypsy & Traveller community. S101 of the Act requires local authorities to conduct a review within one year of the Act coming into force and thereafter every five years. During the review period local authorities must carry out an assessment and report its findings to Welsh Ministers for approval. The report must detail how the assessment was carried out; contain a summary of the consultation process; the responses received and any accommodation need identified by the assessment (Appendix 1).
- 1.3. If from the study an accommodation need is identified, s103 of the Act places a duty on the local authority to exercise its powers under Part five of the Mobile Homes (Wales) Act 2013 to provide sites on which mobile homes may be stationed (Appendix 2).
- 1.4. Under S104, if the Welsh Ministers are satisfied that a local housing authority has failed to comply with their duty under s103, they can direct the authority to exercise those powers conferred to it powers under Part five of the Mobile Homes (Wales) Act 2013 to meet the needs identified in the assessment.

1.5. Objective

- 1.6. The overall objective is to help the Council meet its statutory duty by providing a robust evidence base of the accommodation needs of Gypsies, Travellers and Showpeople within Monmouthshire, both currently and for the next five years.
- 1.7. The Council also regards the Assessment as an opportunity to positively and pro-actively engage with Gypsy & Traveller households in Monmouthshire with a view to establishing and developing a relationship with some or all of the community and providing a building block to help identify and develop future solutions.

1.8 Purpose

- 1.9. The purpose of the assessment is to inform the Council's LDP Annual Monitoring Report and the LDP Review Process to meet those current and future needs for sites whether publicly or privately managed. It will also provide any evidence of whether transit sites or emergency stopping places are required.
- 1.10. The Assessment findings will also provide a complementary supplement to the Local Housing Market Assessment 2015.

1.11 Local Development Plan & Planning Circulars;

- 1.12. Monmouthshire County Council adopted its Local Development Plan (LDP) in February 2014. The LDP sets out the Council's policies for future development and use of land in its area. The framework for assessing proposals to meet the

accommodation needs of Gypsies, Travellers and Travelling Showpeople through the provision of sites, whether for permanent, transit or emergency use can be found in Policy H8 of the LDP (see Appendix 3).

- 1.13. Welsh Government Planning Circular 30/2007¹ provides guidance on the planning aspects of finding sustainable sites for Gypsies and Traveller and advises how local authorities and Gypsies and Travellers can work together to achieve this aim. Welsh Office Circular 78/91² provides local authorities with specific advice on planning considerations relating to Travelling Showpeople.

1.14 Definition of Key Terms

Gypsy and Travellers

- The report adopts the definition found within section 108 of the Housing (Wales) Act 2014
 - (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.
- This definition is sufficiently broad so that not only groups such Romani Gypsies and Irish Travellers are included but also covers those other groups that follow a nomadic life style such as Travelling Showpeople and New Travellers.
- It is also broad enough to cover those who no longer pursue a nomadic lifestyle and live in bricks and mortar accommodation but would like to return to living in a mobile home if sites became available in the future.

- 1.15. All other Key Terms and Concepts can be found within the Welsh Government's guidance for undertaking Gypsy and Traveller Accommodation Assessments (See Appendix 5).

1.16. Statutory Guidance

- 1.17. Under s106 of the Housing (Wales) Act 2014, the Welsh Government produced guidance - 'Undertaking Gypsy & Traveller Accommodation Assessments'- to help local authorities discharge their statutory duties under Part 3 of 2014 Act

- 1.18 The following provides a summary of the guidance:

- Chapter One - sets out the following aims:
 - Why a specific GTAA is required?

¹ Circular 30/2007 Planning for Gypsy and Traveller Caravan Sites, WAG 2007

² Circular 78/91 Travelling Showpeople, Welsh Office 1991

- What should be produced?
- Who needs to be consulted?
- What data sources need to be reviewed?
- Understanding the culture of Gypsy and Traveller communities.
- How to identify and communicate with Gypsies and Travellers?
- How to design, manage and undertake a GTAA?
- Support with partnership working and working regionally.
- Exploring specialist surveys, techniques and questions to be used.
- How accommodation 'need' is assessed?
- Submitting reports to Welsh Ministers.
- How to make provision for identified need?
- Chapter Two – offers guidance on the preparation work required prior to the undertaking of the assessments with advice on what is good practice in setting up steering groups, setting out the design of study and conducting the study itself.
- Chapter Three – explains how to analyse the data from the assessments and how to calculate need.
- Chapter Four – outlines the process for submitting the report to the Welsh Ministers for approval.
- Chapter Five – sets out the options that are available to local authorities on how they can meet any need identified by the assessments.
- Chapter Six – is concerned with reviewing and updating assessments.

1.19 The guidance also includes a universal questionnaire that all local authorities are to use so as to ensure commonality for comparability purposes. The guidance recommends that the questionnaire is completed on a face to face basis so that any issues of literacy is avoided and hopefully ensured a higher rate of participation than a mailshot. The questionnaire comprises of five sections. Sections A to D concern themselves mostly with accommodation needs arising in the area in which the assessment is undertaken. Section E is concerned with the provision of transit sites not only in the area where the assessment is undertaken but also in other local authorities in Wales. The following sub sections give a brief description of the questionnaire:

- Section A – deals with the current accommodation arrangements of community members who partook in the assessment.
- Section B – looks at the family structure.
- Section C – enquires about aspirations and plans.
- Section D – informs the local authority of anticipated family growth and need that is likely to occur within the next five years so that they are able to understand future demand and plan accordingly.
- Section E – is concerned with the need for transit sites and their availability or non-availability throughout Wales.

Chapter Two

2.0 Previous Assessment Findings and Analysis of Existing Data

2.1. Previous Gypsy and Traveller Accommodation Assessment Findings.

2.2 Roger Tym & Partners and Opinion Research Services were commissioned by Monmouthshire County Council in May 2009 to undertake a Gypsy and Traveller Accommodation Needs and Sites Study to inform the LDP evidence base. The final report was published in December 2009.

2.3. The study assessed the need for additional authorised gypsy, traveller and travelling show people site provision in the County. This required the identification of whether there should be any extra site provision on public or private sites and whether or not there was any need to plan for the provision of transit sites/emergency stopping places. It found that Monmouthshire had a very low gypsy and traveller population with only one authorised site (with one caravan) and accordingly that there was very little need for gypsy and traveller sites in Monmouthshire.

2.4. However, given that a planning application had been submitted to the Council for 4 pitches, the study concluded that this represented a need. The site in question, at Llangeview near Usk, was subsequently granted planning permission on appeal for a revised scheme comprising of 2 pitches.

2.5. Given that no other specific need was identified, the study concluded that no other new provision needed to be found through LDP site allocations.

2.6. Analysis of Existing Data - Population Data:

2.7. The number of households in Monmouthshire describing themselves as being of Gypsy & Irish Traveller ethnicity is very low. The 2011 census shows that 6 people identified themselves as Gypsy and Irish Traveller, 0.4% of the population.

2.8. It is argued that this figure under-represents the true number of households in Monmouthshire as the census relied on individuals self-classifying their ethnicity. Nationally it is known that there is a reluctance within the Gypsy and Irish Traveller community for households to reveal their ethnicity for fear of being shown some form of hostility or even racially abused. The ethnicity findings for England and Wales for the 2011 census found that 0.1% of the population self-identified themselves as Gypsy or Irish Traveller, this compares to the Governments own findings completed through other accounting statistics such as caravan counts and school records showing the gypsy and traveller community being around 6% in England and Wales.

2.9. Caravan Count

2.10 A key data source relating to gypsy and traveller communities is the bi-annual Gypsy and Traveller caravan survey conducted by each local authority. This is a count of caravans rather than households and only features those caravans that the Council is

aware of. As this count is undertaken on a specific date unauthorised encampments which occur on other dates are not recorded.

- 2.11. The 2015 caravan counts took place on the 15th of January and 16th of July both of which identified one caravan in the south of the County. This is a private site.
- 2.12 There is also a private site at Llangeview near Usk for 2 pitches, however, at the time of the caravan counts it would appear that the site was unoccupied and subsequently not picked up through the counts.
- 2.13. It is evident from past caravan counts that in comparison with other authorities Monmouthshire has a very low gypsy and traveller population.

2.14 Current Accommodation Provision

- 2.15 Monmouthshire currently has no local authority run sites, either residential or transit.
- 2.16 Monmouthshire has two privately owned sites.
- 2.17 There are no sites currently under review at the planning stage. Nor are there any temporary planning permissions in place.
- 2.18 There has been a total of 10 unauthorised encampments used by the travelling community when travelling through the County during the years 2013, 2014 and 2015. The following graphs show the number of occurrences by month and year (figure 1); the total number of caravans per year (figure 2) and the duration of the stay (figure 3).

Figure 1

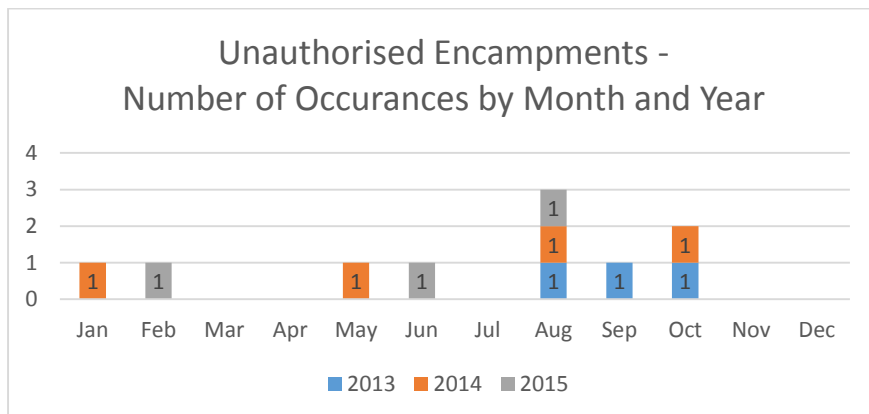
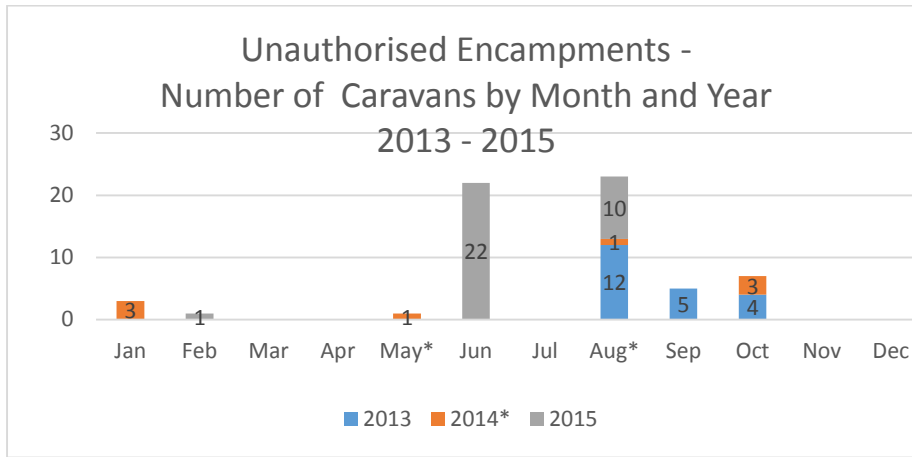
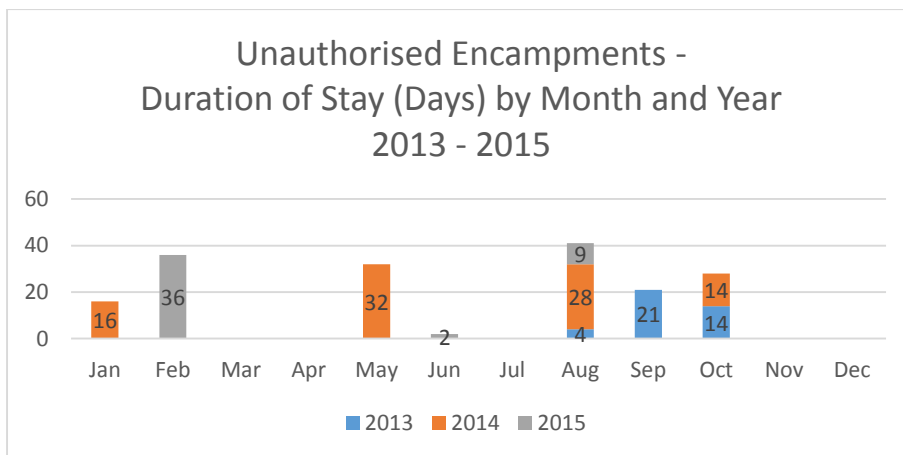


Figure 2



* Incomplete data for May & August 2014. This figure is a nominal and is likely to be a gross under estimation of the true figure.

Figure 3



Chapter Three

3.0 Methodology

3.1 Project Steering Group

3.2 For the assessment to be taken seriously by the Gypsy and Traveller community it needed to be well informed and robust. It was therefore recognised that the starting point should be the formation of a steering group comprising of important key stakeholders some of which already have established networks within the community.

3.3. The purpose of the group was to take ownership and oversee the assessment process and to assist the Council in meeting its statutory duty to assess the accommodation needs of the Monmouthshire Gypsy & Traveller community. Its key responsibilities were to:

- Identify other relevant agencies who should be asked to participate in the steering group
- To positively promote the Assessment and encourage participation
- Provide local knowledge;
- Help to identify households living within the community
- Publicise the assessment study within their own fields and to households within the respective networks
- To help raise awareness of the Gypsy & Traveller culture and the potential barriers typically experienced
- To help scrutinise and provide feedback on the results:
- To sign off the report to be submitted to Welsh Government.

3.4. The group consisted of representations from the following agencies:

- MCC Elected Members
- SE Wales Regional Equality Council
- Equalities Officer (MCC)
- Adult Social Services (MCC)
- Rural Programmes Manager (MCC)
- Specialist Environmental Health Officer (MCC)
- Monmouthshire Housing Association
- Melin Homes
- Planning Policy Department (MCC)
- Housing Options Team (MCC)
- Children's Services - Safe Guarding in Education
- Principal Officer Inclusion Officer - Children and Young People (MCC)
- Deputy Head of Gwent Education Minority Ethnic Service (GEMS)
- Senior Commissioning Officer, Supporting People (MCC)
- Housing & Communities Manager (MCC)
- Project Officer, Monmouthshire Voices

- Waste & Street Services (MCC)
- Regional Community Cohesion Co-ordinator East Gwent
- Gwalia
- Public Health Wales
- Police
- Member of the local Gypsy & Traveller community (x 4)
- Officer from adjoining local authorities.

3.5. Study Methodology

- 3.6 The assessment study was conducted directly by officers from the Council’s Housing & Community Services between June and November 2015.
- 3.7 The priority at the onset was, as per the Guidance, to endeavour to undertake face to face interviews to not only maximise engagement opportunities but also to mitigate against possible literacy issues
- 3.8 Where applicable, members of the Steering Group provided information of known Gypsy & Travellers and also where applicable, informed households that the Assessment was being conducted and invited household’s to participate.
- 3.9 Due consideration was given to the engagement checklist contained in the Guidance. Table 1 sets out the Guidance checklist and provides commentary about the Council’s application of the checklist within the context that the Council does not have any local authority run sites in the County:

Table 1: Welsh Government Checklist

1.	<p>Visit every Gypsy and Traveller household identified through the data analysis process up to 3 times, if necessary.</p> <ul style="list-style-type: none"> • There was only one household that the Council did not manage to fully engage with and repeat visits failed to achieve successful contact. A request to liaise with a family representative (a planning consultant) was also unsuccessful
2.	<p>Publish details of the GTAA process, including contact details to allow community members to request an interview, on the Local Authority website, Travellers’ Times website and World’s Fair publication.</p> <ul style="list-style-type: none"> • This guidance was followed. In addition the Council published a press release in August 2015.
3.	<p>Consult relevant community support organisations.</p> <ul style="list-style-type: none"> • The Council engaged closely with the SE Wales Regional Equality Council who helped inform the Assessment. This engagement facilitated the input of the Equality Council’s Gypsy & Traveller Liaison Officer.

4.	<p>Develop a Local Authority waiting list for both pitches and housing, which is accessible and communicated to community members.</p> <ul style="list-style-type: none"> • All households interviewed were advised about the Council's Housing Register and invited to register an application. • At the time of the Assessment, the Council did not have a waiting list in place. • The Assessment process identified households who were interested in going on to a pitch waiting list. • A recommendation of this Assessment is to establish a waiting list policy and to contact and invite those households to register.
5.	<p>Endeavour to include Gypsies and Travellers on the GTAA project steering group.</p> <ul style="list-style-type: none"> • Invitations to join the Steering Group were accepted by four individual members of the Gypsy & Traveller community, all of whom were residents of bricks and mortar social housing.
6.	<p>Ensure contact details provided to the Local Authority by community members through the survey process are followed up and needs assessed.</p> <ul style="list-style-type: none"> • All interviews provided the opportunity for other community members to be interviewed through the process.
7.	<p>Consider holding on-site (or nearby) GTAA information events to explain why community members should participate and encourage site residents to bring others who may not be known to the Local Authority.</p> <ul style="list-style-type: none"> • This wasn't considered appropriate for Monmouthshire due to there being no Council managed site in the County.

3.10. Raising awareness of the survey internally within the Council and externally has been a priority of the methodology. The following range of mechanisms have been utilised to communicate the implementation of the assessment:

- Briefing note provided to all Elected Members and an Elected Member Briefing Session supported by officers from Housing & Communities and Planning Services, prior to full Council on 30th July 2015. This included the circulation of a bespoke briefing note, a copy of the Council's flyer and a link to the Welsh Government video.
- Press release August 2015
- The distribution of a Monmouthshire County Council flyer by Steering group members to Gypsy & Traveller households
- Assessment details published on the Council's website
- An awareness briefing was provided to the Steering Group on 10th September 2015 by the SE Wales Regional Equalities Council. The intention was to arrange awareness training for the Council's elected members. However, this wasn't

progressed due to the Welsh Governments proposal to organise regional training across Wales.

- Regional elected member awareness training by Welsh Government on 14th December 2015. Six Monmouthshire County Council elected members attended
- The Assessment was considered and scrutinised by the Council's Stronger Communities Select Committee on 11th January 2016
- The Assessment Report is to go before the Council's Cabinet on 3rd February 2016.
- An outcome of the engagement has been the feedback relating to the understanding of the Council's planning policies and procedures. The Council, therefore, has agreed to facilitate a briefing session in the Spring of 2016 targeted at Gypsy & Traveller households.

Chapter 4

4.0. Survey Findings

4.1. Households Interviews

4.2. The following provides a profile of the assessment interviews

4.3. 20 Households were identified through the following means:-

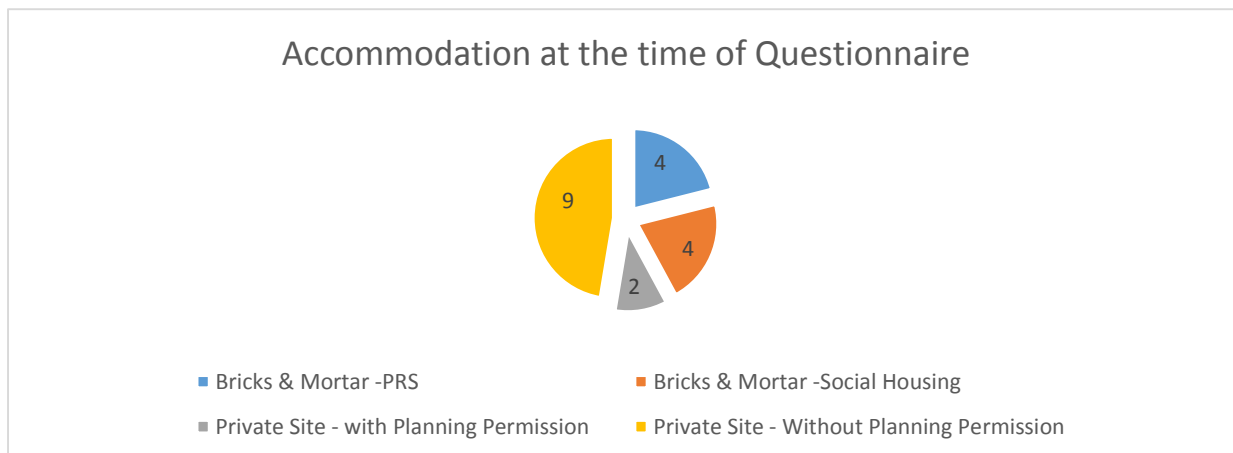
- The housing register.
- By members of the steering group.
- By attending unauthorised encampments.
- Through the interviewing process itself - 4 households were identified as additional contacts through the interviewing process

4.4. 19 households were surveyed in total, of which 18 interviews were conducted face to face and one by telephone as they lived outside the county.

4.5. One household declined to undertake the survey without first seeking advice and guidance from a family representative. Phone, email and text messages were sent to the representative, none of which were returned.

4.6. Just over 42% of the interviews were from respondents living in bricks and mortar, while just over 58% were from respondents living on Private sites. A full breakdown can be seen at figure 4 below.

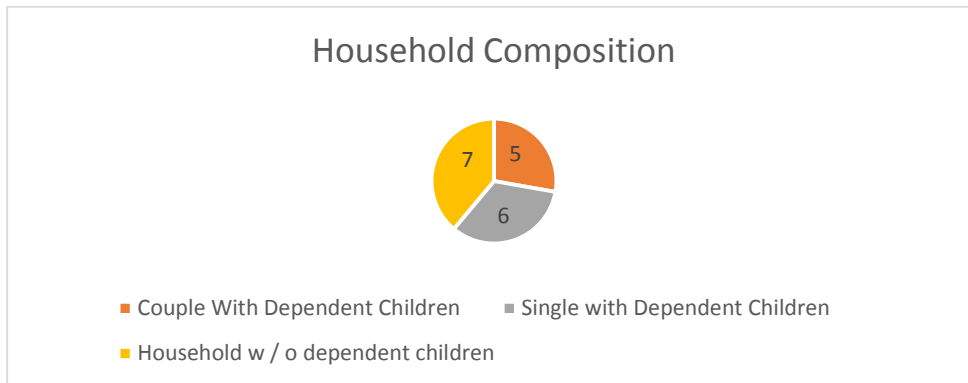
Figure 4 – Accommodation at the Time of Questionnaire



4.7. Household Composition:

4.8. 19 respondents completed this section with a small majority of households having dependent children. See figure 5, below for a detailed breakdown.

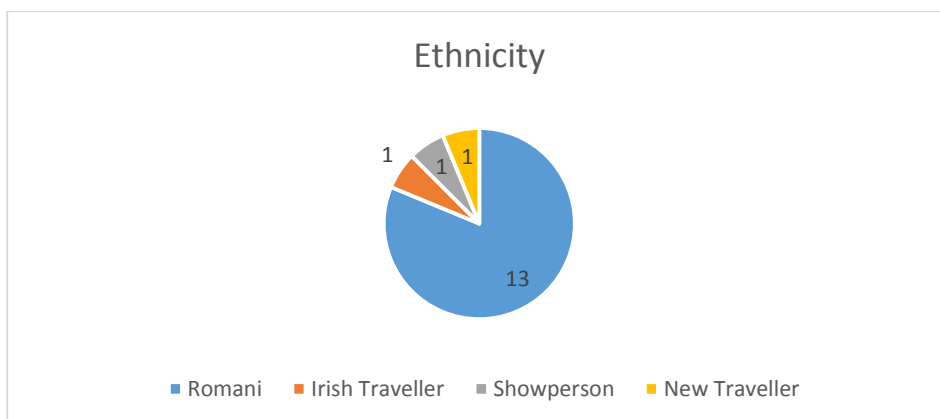
Figure 5 – Household Composition



4.9. Household Ethnicity:

4.10. Thirteen out of nineteen respondent households identified their ethnicity as Romani, while three households identified themselves as Irish Traveller, Travelling Showperson and a New Traveller respectively (figure 6). Three respondent households declined to answer.

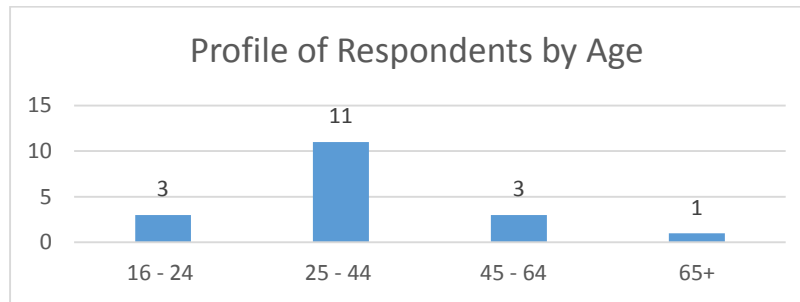
Figure 6 – Household Ethnicity



4.11. Respondent by Age Profile:

4.12 It can be seen from figure 7 that the largest number of respondent households were between 25 -64 years of age. With three respondents being classed as a young person (16 – 24) and one respondent being classed as an older person household (65+). One Household declined to answer.

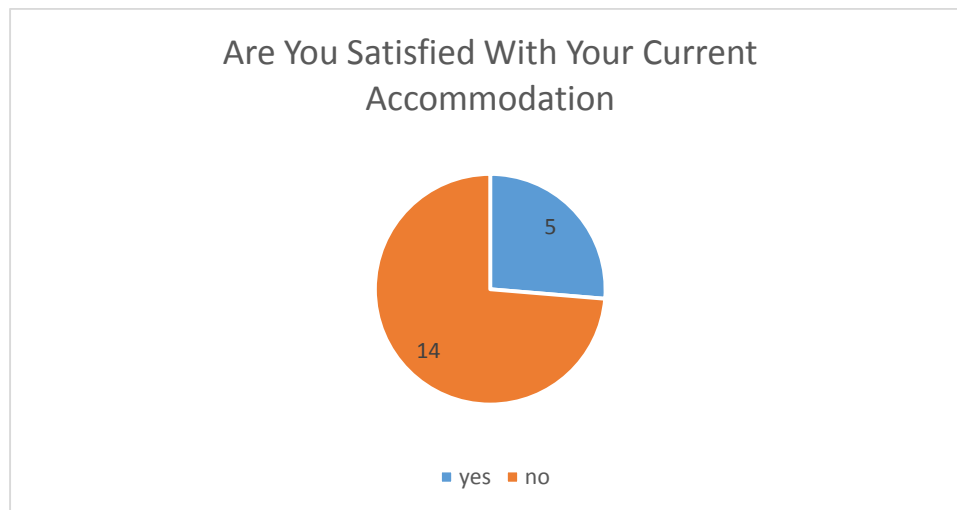
Figure 7 – Respondent by Age Profile



4.13 Suitability of Current Accommodation:

4.14 Fourteen of the respondents when asked if they were happy with their current accommodation responded negatively (Figure 8).

Figure 8 – Suitability of Current Accommodation



4.15. A further analysis shows that out of the 14 respondents who were dissatisfied with their current accommodation

- Six live in bricks and mortar, the most common reasons cited for their dissatisfaction were feelings of being trapped and not being accepted by the community.
- Two respondents were living on one authorised site but were unhappy with the current planning permissions granted.
- Two respondents were living on two unauthorised but permanent sites and were unhappy with the facilities.
- Four respondents were living on unauthorised sites but these sites were temporary as they were occupied for a religious festival.

Chapter Five

5.0 Assessing Accommodation Needs

5.1 Understanding 'Need' and 'Preferences'

- 5.2. When it comes to pitch provision and choice travellers are limited as to where they can choose to live. This is because in contrast to the non-travelling households - which have much wider choices due to the availability of social housing estates in all local authorities – travellers encounter local authorities where there are no authorised sites at all.
- 5.3. This can result in travellers occupying sites in nearby local authorities where sites are available but they have a preference / need to live in a neighbouring local authority which has no sites. This has the effect of depriving a local household of a pitch. It can also mean that traveller households move into bricks and mortar accommodation in their preferred local authority area. For some this is an option choice but for others it is because there are no other suitable alternative options available to them.
- 5.4. This presents a challenge to a local authority when undertaking the assessments as it will want to distinguish between a need and a preference, as it is 'needs' that determine whether the local authority has to provide sites and pitches.
- 5.5. For the purpose of this assessment need may take the following form:
- Households that have no authorised site on which to reside
 - Households that are overcrowded
 - Households that have a cultural aversion to living in conventional bricks and mortar housing.
- 5.6. Gypsy and Traveller households in conventional housing may experience what is known as 'cultural aversion'. This is where the impact of living in conventional housing is having a detrimental effect on the health and wellbeing of a household member.
- 5.7. However, it is not expected that local authorities do an in-depth investigation into an individual's assertion that they are suffering cultural aversion for purposes of this assessment, any in depth investigation should be made part of the authority's homelessness or pitch allocation policies. The assessment process aims to give a broad estimation of the likelihood of need in their area. (Paragraph 176 – 178 of the Guidance).

5.8. Residential Unmet Need

- 5.9. In terms of assessing the accommodation needs of the travelling community the assessment surveyed travellers across all accommodation sites that they found themselves in at the time the survey was conducted, that is, bricks and mortar; unauthorised sites and private sites.

5.10 Table 2 below is shows the various factors which were taken into account when estimating the need for residential pitches in Monmouthshire.

Table 2 – An Estimate of need for residential site pitches

Current residential supply		Number of pitches
A. Occupied Local Authority pitches		0
B. Occupied authorised private pitches		3
Total		3
Planned residential supply		Number of pitches
C. Vacant Local Authority pitches and available vacant private pitches		0
D. Pitches expected to become vacant in near future (see note 1)		0
E. New Local Authority and private pitches with planning permission		0
Total		0
Current residential demand		Pitch demand
F. unauthorised encampments		1
G. unauthorised development		0
H. overcrowded pitches (see note 2)		1
I. Conventional housing (see note 3)		5
J. New households to arrive (see note 4)		0
Total		7
Current households (see note 7)	Future households (at year 5)	Future households (Plan period)
K.1. 10	K.2 11 (see note 5)	K.3 11 (see note 6)
L.1. Additional household pitch need	L.2 1	L.3 1
Unmet Need		Need arising
		Need accommodated

Notes
1. As identified through analysis of pitch turnover data.

2. Overcrowding – e.g. where family numbers have grown to the extent that there is now insufficient space for the family

M. Current residential demand	7	
N. Future residential demand (5 year)	1	
O. Future residential demand (plan	1	
P. Planned residential supply	0	
Q. Unmet need (5 year)		8
R. Unmet need (Plan period)		8

within its mobile home accommodation and insufficient space on the pitch or site for a further mobile home.

3. As identified in the survey. This includes those with a cultural aversion to conventional housing, those experiencing overcrowding, and those whom have reached adulthood and want to live on a site.
4. As identified in the survey through waiting list, Caravan Count or partnership working with Local Authorities in the region.
5. 118 households (current residential supply + current residential demand – pitches expecting to become vacant) @ 2.25% year on year for 5 years. Growth rate for illustration only. Local growth rate should be based on details identified in the local survey.
6. 118 households (current residential supply + current residential demand – pitches expecting to become vacant) @ 2.25% year on year for 15 years. Growth rate and 15 year plan period for illustration only. Local growth rate should be based on details identified in local survey. Plan period should align to current LDP.
7. Occupied authorised pitches plus the current residential demand, minus the expected vacancies from authorised pitches.

5.11. Current Residential Supply –

- Row A – is concerned with local authority run sites
- Row B – is concerned with private sites and pitches with planning permission.

Table 3 - Current Residential Supply.

Table Entry:	Row A = 0 Row B = 3
Explanation:	This section is concerned with the number of pitches in total on local authority and private sites.
Findings:	Monmouthshire has no local authority run sites and two private sites with a total of 3 pitches.

5.12. Planned Residential Supply

- Row C - Vacant Local Authority pitches and available vacant private pitches.
- Row D – Pitches expected to become vacant in near future (see note 1)
- Row E - New Local Authority and private pitches with planning permission

Table 4 - Planned Residential Supply

Table Entry:	Row C = 0 Row D = 0 Row E = 0
Explanation:	This section is concerned with the number of vacant pitches either current or becoming vacant in the near future in both local authority and private run sites. It also looks at any site in the planning process.
Findings:	Because Monmouthshire has no local authority sites there are no vacant pitches from this source.

5.14 Current Residential Demand

- Row F – is concerned with unauthorised encampments
- Row G – is concerned with unauthorised development
- Row H – is concerned with overcrowding issues.
- Row I – Households identified in conventional housing
- Row J – Households identified by other local authorities and referred on to Monmouthshire.

Table 5 - Planned Residential Demand

Table Entry:	<p>Row F = 1</p> <p>Row G = 0</p> <p>Row H = 1</p> <p>Row I = 0</p> <p>Row J = 5</p> <p>Total = 7</p>
Explanation:	<p>This section is concerned with assessing the accommodation needs of the households interviewed and will inform the level of current and future demand. This involved officers making a judgement as to whether households expressed a need or a preference (see para 5.0.1, above).</p>
Findings:	<p>Seven households were found to have a current residential need.</p> <ul style="list-style-type: none"> • One Household was being accommodated on a private site without planning permission and • One Household was considered as a need based in Monmouthshire (Housing Authority area) but for planning purposes the encampment comes under the jurisdiction of the Brecon Beacons National Park Authority. • It is estimated that five households from conventional housing were found to have a need for mobile accommodation based on cultural aversion. <p>It should be noted that the current residential demand from those in conventional housing is not based on any in-depth assessment of each household but has been determined on the likelihood of them experiencing cultural aversion based on evidence and comments given at their interview. These comments ranged from issues of discrimination and harassment from neighbours to feelings of being trapped, one responded replied that 'walls are like cages'.</p> <p>At the time of drafting no referrals from other local authorities have been received.</p> <p>No unauthorised developments were identified.</p>
Calculation:	<p>Rows F+G+H+I +J</p>

5.15. Current Households and Future Residential Demand

- Row K,
 - K1 - provides the current residential demand
 - K2 - This provides an estimate of additional households over the next 5 years.
 - K3 - This provides an estimate of additional households over the remaining Local Development Plan period.
- Row L, - Additional Household Pitch Need.
 - L1 - represents need for the next 5 years.

- L2 - represents need over the remaining Local Development Plan period.

Table 6 - Current Households and Future Residential Demand

Table Entry:	Row K1 = 7 Row K2 = 0 Row K3 = 0 Row L2 = 0 Row L3 = 0
Explanation:	This section determines future demand based on the growth of households over the next 5 years and during the remaining Local Development Plan (LDP) period. Because the current LDP period runs to 2021 for the purpose of this report it is considered to runs co-terminus with the 5 year period. Growth figures are based on the findings of the assessment questionnaires which looked at family growth over the next five years.
Findings:	From The Assessment questionnaire a small number of households identified a demand for future household growth. Due to the small number identified, for calculation purposes we have taken the mid-range figure of 2% of the indicative range of percentage growth figures of between 1.5% and 3% suggested in the Guidance.
Calculation:	K1 is calculated by adding Rows F through to J minus Row E - D. K2 - based on the answers provided by the respondents of the survey. K3 - based on the answers provided by the respondents of the survey. L2 - is calculated by subtracting the number in Row K1 from the future number of household growth found in the K2 ($K2 - K1$). L3 - is calculated by subtracting the number in row K1 from the future number of household growth found in the K3 ($K3 - K1$).

5.16. Unmet Need

- Row M – Current Residential Demand (5 year period)
- Row N - Future Residential Demand (remaining plan period)
- Row O – Future Residential Demand
- Row P – Planned Residential Pitch Supply
- Row Q – Unmet Need - over the next 5 year period.
- Row R – Unmet Need over the remaining LDP period.

Table 7 - Unmet Need

Table Entry:	<p>Row M = 7</p> <p>Row N = 1</p> <p>Row O = 1</p> <p>Row P = 0</p> <p>Row Q = 8</p> <p>Row R = 8</p>
Explanation:	<p>This section is concerned with the overall residential or unmet need for additional pitches over the next 5 years and over the remaining LDP period, which for Monmouthshire run concurrently.</p>
Findings:	<p>From the Assessment questionnaire a small number of households identified a demand for future household growth. Due to the small number identified, for calculation purposes we have taken the mid-range figure of 2% of the indicative range of percentage growth figures of between 1.5% and 3% suggested in the Guidance.</p>
Calculation:	<p>M- current residential demand found in Row K1.</p> <p>N – Populated by the number found in Row K2 (5 year period).</p> <p>O - Populated by the number found in Row K3 (remaining LDP period).</p> <p>P - This is the aggregate of Rows C, D and E.</p> <p>Q - Is the calculated by adding current residential demand (Row M) and future 5 year residential demand (Row N) and subtracting the planned residential supply (Row P) [M + N –P].</p> <p>R – Is calculated by adding current residential demand (Row M) and future residential demand over the remaining LDP period (Row O) and subtracting the planned residential supply (Row P) [M+O-P]</p>

5.17. Transit Need

- 5.18. Under the Housing Act 2014, Local Authorities have a statutory duty to provide transit sites if an identifiable need is found.
- 5.19 However, when taking into account the guidance on calculating transit need with the evidence provided by the Welsh Government’s Caravan Count, the Council’s data on unlawful encampments and the evidence provided by the assessment questionnaire this would suggest that there is not a need for a transit site in Monmouthshire.
- 5.20 Section E of the survey questionnaire suggests that there is need for temporary stopping places within Monmouthshire and Wales as a whole.
- 5.21 The Welsh Government has encouraged local authorities to work in partnership to develop a national network of transit sites in the most appropriate locations throughout Wales, this assessment supports this approach to meet the requirements for short-term stopping place accommodation.

Chapter Six

6.0. Conclusions; Recommendations and Next Steps

6.1. This chapter looks at the key conclusions and recommendations in respect of meeting the accommodation needs of Gypsies, Travellers and Showpeople in Monmouthshire. However a note of caution, calculating levels of need for Gypsies, Travellers and Showpeople is not as straight forward as being able to calculate conventional housing need. When looking at the needs of Gypsies, Travellers and Showpeople we are not just considering the need for accommodation but also the need to maintain a way of life – their cultural identity – that is achieved from living in mobile accommodation. It should also be noted that when calculating conventional housing accommodation need, data is available from an extensive number of sources. Due to cultural sensitivities and lack of engagement from the community in general this level of data is not available when undertaking this type of survey.

6.2. Conclusions

6.3. The key issues that came out of the assessment process can be summarised as follows:

- The Assessment identified a higher number of Gypsy & Traveller households in Monmouthshire than previous data sources indicated. 12 households were identified in total, 7 living in bricks and mortar and 4 in mobile accommodation.
- There is an estimated unmet need for eight pitches to 2021, based on overcrowding, unauthorised occupation and the likelihood of cultural aversion to conventional housing.
- There is not a need for a transit site due to the low number of unauthorised encampments in the County.
- A need for stopping places has been identified.
- A need for travelling Showpeople yard has not been identified.
- There is an expectation that the Council should have a waiting list to allow Gypsy & Traveller households to register an interest in obtaining an authorised pitch for a mobile home, as well as for bricks and mortar accommodation
- A number of households within the community do not understand the Council's Planning Policy in relation to pitch provision.
- No additional households who wanted or needed to live in Monmouthshire have been drawn to the attention of the Council from other Welsh authorities
- Further consideration is given to amending current planning permission to allow lifetime occupation by additional named individuals in order to address identified unmet need

6.4. Recommendations

6.5 Based on the key issues identified above at 6.3 it is recommended that consideration is given to the following:

- The Council to conduct in-depth further assessments into the households identified by the assessment as having a likelihood of need based on cultural aversion.
- The Council establishes a pitch waiting list policy.
- The Council considers amending current planning permission to allow lifetime occupation by additional named individuals in order to address identified unmet need
- The Council works collaboratively with neighbouring local authorities to meet identified need for the development of additional temporary stopping places within the Gwent region;
- The Council organises an engagement event to enable Gypsy & Traveller households to find out more about the Council's planning policies and procedures so that the Community is able to seek planning advice on development opportunities prior to future land purchases.
- Mechanisms are established to enable effective engagement with both settled and Gypsy Traveller communities in relation to the identification of future potential sites.

6.6. Next Steps

- Undertake more detailed assessment of those households identified through the assessment as having a likelihood of need based on cultural aversion by May 2016.
- Establish a waiting list and policy during 2016
- Engage with neighbouring Gwent authorities in respect of stop-over sites in liaison with WG
- Organise the Planning briefing session for Gypsy & Traveller households in the Spring of 2016.
- Inform the 2016 LDP Annual Monitoring Report (AMR) and subsequent LDP review process of the Assessments findings/April 2016

*Housing (Wales) Act 2014 (anaw 7) 72***PART 3****GYPSIES AND TRAVELLERS***Meeting accommodation needs***101 Assessment of accommodation needs**

- (1) A local housing authority must, in each review period, carry out an assessment of the accommodation needs of Gypsies and Travellers residing in or resorting to its area.
- (2) In carrying out an assessment under subsection (1) a local housing authority must consult such persons as it considers appropriate.
- (3) In subsection (1), “review period” means—
 - (a) the period of 1 year beginning with the coming into force of this section, and
 - (b) each subsequent period of 5 years.
- (4) The Welsh Ministers may amend subsection (3)(b) by order.

102 Report following assessment

- (1) After carrying out an assessment a local housing authority must prepare a report which—
 - (a) details how the assessment was carried out;
 - (b) contains a summary of—
 - (i) the consultation it carried out in connection with the assessment, and
 - (ii) the responses (if any) it received to that consultation;
 - (c) details the accommodation needs identified by the assessment.
- (2) A local housing authority must submit the report to the Welsh Ministers for approval of the authority’s assessment.
- (3) The Welsh Ministers may—
 - (a) approve the assessment as submitted;
 - (b) approve the assessment with modifications;
 - (c) reject the assessment.
- (4) If the Welsh Ministers reject the assessment, the local housing authority must—
 - (a) revise and resubmit its assessment for approval by the Welsh Ministers under subsection (3), or
 - (b) conduct another assessment (in which case section 101(2) and this section apply again, as if the assessment were carried out under section 101(1)).
- (5) A local housing authority must publish an assessment approved by the Welsh Ministers under this section.

103 Duty to meet assessed needs

- (1) If a local housing authority’s approved assessment identifies needs within the authority’s area with respect to the provision of sites on which mobile homes may be stationed the authority must exercise its powers in section 56 of the Mobile Homes (Wales) Act 2013 (power of authorities to provide sites for mobile homes) so far as may be necessary to meet those needs.
- (2) But subsection (1) does not require a local housing authority to provide, in or in connection with sites for the stationing of mobile homes, working space and facilities for the carrying on of activities normally carried out by Gypsies and Travellers.
- (3) The reference in subsection (1) to an authority’s approved assessment is a reference to the authority’s most recent assessment of accommodation needs approved by the Welsh Ministers under section 102(3).

104 Failure to comply with duty under section 103

- (1) If the Welsh Ministers are satisfied that a local housing authority has failed to comply with the duty imposed by section 103 they may direct the authority to exercise its powers under section 56 of the Mobile Homes (Wales) Act 2013 so far as may be necessary to meet the needs identified in the authority’s approved assessment.

- (2) Before giving a direction the Welsh Ministers must consult the local housing authority to which the direction would relate.
- (3) A local housing authority must comply with a direction given to it.
- (4) A direction given under this section—
 - (a) must be in writing;
 - (b) may be varied or revoked by a subsequent direction;
 - (c) is enforceable by mandatory order on application by, or on behalf of, the Welsh Ministers.

105 Provision of information upon request

- (1) A local housing authority must provide the Welsh Ministers with such information (and at such times) as they may require in connection with the exercise of their functions under this Part.
- (2) The Welsh Ministers may exercise their powers under this section generally or in relation to a particular case.

106 Guidance

- (1) In exercising its functions under this Part, a local housing authority must have regard to any guidance given by the Welsh Ministers.
- (2) The Welsh Ministers may—
 - (a) give guidance either generally or to specified descriptions of authorities;
 - (b) revise the guidance by giving further guidance under this section;
 - (c) withdraw the guidance by giving further guidance under this section or by notice.
- (3) The Welsh Ministers must publish any guidance or notice under this section.

107 Duties in relation to housing strategies

- (1) This section applies where a local housing authority is required under section 87 of the Local Government Act 2003 to have a strategy in respect of meeting the accommodation needs of Gypsies and Travellers residing in or resorting to its area.
- (2) The local housing authority must—
 - (a) have regard to any guidance given by the Welsh Ministers in preparing its strategy;
 - (b) take the strategy into account in exercising its functions (including functions exercisable other than as a local housing authority).

General

108 Interpretation

In this Part—

“accommodation needs” (*“anghenion llety”*) includes, but is not limited to, needs with respect to the provision of sites on which mobile homes may be stationed;

“Gypsies and Travellers” (*“Sipsiwn a Theithwyr”*) 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;

“mobile home” (*“cartref symudol”*) has the meaning given by section 60 of the Mobile Homes (Wales) Act 2013.

109 Power to amend definition of Gypsies and Travellers

- (1) The Welsh Ministers may by order amend the definition of Gypsies and Travellers in section 108 by—
 - (a) adding a description of persons;
 - (b) modifying a description of persons;
 - (c) removing a description of persons.

(2) An order under this section may also make such amendments of the Mobile Homes (Wales) Act 2013 as the Welsh Ministers consider necessary or appropriate in consequence of a change to the definition mentioned in subsection (1).

110 Consequential amendments

Part 2 of Schedule 3 makes consequential amendments relating to this Part.

Mobile Homes (Wales) Act 2013

PART 5

POWERS OF LOCAL AUTHORITIES

56 Power to provide sites for mobile homes

(1) A local authority may within its area provide sites where mobile homes may be brought, whether for holidays or other temporary purposes or for use as permanent residences, and may manage the sites or lease them to another person.

(2) A local authority has power to do anything appearing to it desirable in connection with the provision of such sites and the things which it has power to do include (but are not limited to)—

(a) acquiring land which is in use as a mobile home site or which has been laid out as a mobile home site,

(b) providing for the use of those occupying mobile home sites any services for their health or convenience, and

(c) providing, in or in connection with sites for the accommodation of Gypsies and Travellers, working space and facilities for the carrying on of activities normally carried on by them.

(3) In exercising its powers under this section a local authority must have regard to any standards specified by the Welsh Ministers under section 10.

(4) Before exercising the power under subsection (1) to provide a site the local authority must consult the fire and rescue authority—

(a) as to measures to be taken for preventing and detecting the outbreak of fire on the site, and

(b) as to the provision and maintenance of means of fighting fire on it.

(5) A local authority must make in respect of sites managed by it, and of any services or facilities provided or made available under this section, such reasonable charges as it may determine.

(6) A local authority may make available the services and facilities provided under this section for persons whether or not they normally reside in its area.

(7) A local authority may, where it appears to it that—

(a) a mobile home site or an additional mobile home site is needed in its area, or

(b) that land which is in use as a mobile home site should in the interests of the users of mobile homes be taken over by the local authority, acquire land, or any interest in land, compulsorily.

(8) The power conferred by subsection (7) is exercisable in any particular case only if the local authority is authorised by the Welsh Ministers to exercise it.

(9) The Acquisition of Land Act 1981 has effect in relation to the acquisition of land, or an interest in land, under subsection (7).

(10) A local authority does not have power under this section to provide mobile homes.

Policy H8 – Gypsy, Traveller and Travelling Showpeople Sites

Where a need is identified for transit or permanent pitches/ plots for the accommodation needs of Gypsies, Travellers and Travelling Showpeople, they will be permitted provided they:

- a) Would enable the established need to be met at a location that is accessible to schools, shops and health care, by public transport, on foot or by cycle;
- b) Have a safe and convenient access to the highway network and will not cause traffic congestion or safety problems;
- c) Are of a suitable size to allow for the planned number of caravans, amenity blocks, a play area (for children on sites housing multiple families), the access road and include sufficient space for the parking and safe circulation of all vehicles associated with occupiers within the site curtilage;
- d) Do not occupy a prominent location and are consistent with LDP policies for protecting and enhancing character and distinctiveness of the landscape and environment. Where necessary the proposal will include mitigating measures to reduce the impact, and assimilate the proposal into its surroundings e.g. screening and landscaping;
- e) Avoid areas at high risk of flooding and proximity to uses with potential sources of pollution or emissions;
- f) Are of an appropriate scale to their location and do not have an unacceptable impact on the amenities of neighbouring land uses;
- g) Are served, or can be served, by adequate on-site services for water supply, power, drainage, sewage disposal and waste disposal (storage and collection), and for Travelling Showpeople that there is a level area for outdoor storage and maintenance of equipment.

Proposals for the use of land for emergency pitches¹ to meet proven need for use by gypsies and travellers will provide basic facilities, meet criteria b, d, e and f of this policy, and the location should be within reasonable travelling distance of a settlement with services and community facilities, including health and education.

Residential site - A permanent residential site can be privately owned or owned by the Local Authority. This site will be designated for use as a Gypsy and Traveller site indefinitely. Residents on these sites can expect to occupy their pitches for as long as they abide by the terms of their pitch agreements, under the Mobile Homes (Wales) Act 2013. Working space may also be provided on, or near, sites for activities carried out by community members.

Temporary residential site - These sites are residential sites which only have planning permission or a site licence for a limited period. Residents on these sites can expect to occupy their pitches for the duration of the planning permission or site licence (or as long as they abide by the terms of their pitch agreements, under the Mobile Homes (Wales) Act 2013 – whichever is sooner).

Transit site - Transit sites are permanent facilities designed for temporary use by occupiers. These sites must be designated as such and provide a route for Gypsies and Travellers to maintain a nomadic way of life. Individual occupiers are permitted to reside on the site for a maximum of 3 months at a time. Specific terms under the Mobile Homes (Wales) Act 2013 apply on these sites. Working space may also be provided on, or near, sites for activities carried out by community members.

Temporary Stopping Place - Also known as a 'stopping place', 'Atchin Tan', or 'green lane', amongst other names. These are intended to be short-term in nature to assist Local Authorities where a need for pitches is accepted, however, none are currently available. Pro-actively identified temporary stopping places can be used to relocate inappropriately located encampments, whilst alternative sites are progressed. Temporary stopping places must make provision for waste disposal, water supply and sanitation at a minimum.

Residential pitch - Land on a mobile home site where occupiers are entitled to station their mobile homes indefinitely (unless stated in their pitch agreement). Typically includes an amenity block, space for a static caravan and touring caravan and parking.

Transit pitch - Land on a mobile home site where occupiers are entitled to station their mobile homes for a maximum of 3 months. Transit pitches can exist on permanent residential sites, however, this is not recommended.

Unauthorised encampment - Land occupied without the permission of the owner or without the correct land use planning permission. Encampments may be tolerated by the Local Authority, whilst alternative sites are developed.

Unauthorised development - Land occupied by the owner without the necessary land use planning permission.

Current residential supply - The number of authorised pitches which are available and occupied within the Local Authority or partnership area. This includes pitches on Local Authority or private sites.

Current residential demand - Those with a need for authorised pitches for a range of reasons, including:

- An inability to secure an authorised pitch leading to occupation of unauthorised encampments;
- An inability to secure correct planning permission for an unauthorised development;
- Households living in overcrowded conditions and want a pitch;
- Households in conventional housing demonstrating cultural aversion;
- New households expected to arrive from elsewhere.
- Future residential demand - The expected level of new household formation which will generate additional demand within the 5 year period of the accommodation assessment and longer LDP period.

Overall residential pitch need - The ultimate calculation of unmet accommodation need, which must be identified through the Gypsy and Traveller accommodation assessment process. This figure can be found by adding the immediate residential need to the future residential demand. The overall residential need will capture the needs across the 5 year period within which the accommodation assessment is considered to be robust.

Planned residential pitch supply - The number of authorised pitches which are vacant and available to rent on Local Authority or private sites. It also includes pitches which will be vacated in the near future by households moving to conventional housing or in other circumstances. Additional pitches which are due to open on private sites likely to achieve planning permission shortly should be included as planned residential supply.

Household In this guidance this refers to individuals from the same family who live together on a single pitch / house / encampment.

Concealed or 'doubled up' household - This refers to households which are unable to achieve their own authorised accommodation and are instead living within authorised accommodation (houses or pitches) assigned to another household. This may include adult children who have been unable to move home or different households occupying a single pitch.

Household growth - In this guidance household growth is defined by the number of new households arising from households which are already accommodated in the area.

This page is intentionally left blank

*Housing (Wales) Act 2014 (anaw 7) 72***PART 3****GYPSIES AND TRAVELLERS***Meeting accommodation needs***101 Assessment of accommodation needs**

- (1) A local housing authority must, in each review period, carry out an assessment of the accommodation needs of Gypsies and Travellers residing in or resorting to its area.
- (2) In carrying out an assessment under subsection (1) a local housing authority must consult such persons as it considers appropriate.
- (3) In subsection (1), “review period” means—
- (a) the period of 1 year beginning with the coming into force of this section, and
 - (b) each subsequent period of 5 years.
- (4) The Welsh Ministers may amend subsection (3)(b) by order.

102 Report following assessment

- (1) After carrying out an assessment a local housing authority must prepare a report which—
- (a) details how the assessment was carried out;
 - (b) contains a summary of—
 - (i) the consultation it carried out in connection with the assessment, and
 - (ii) the responses (if any) it received to that consultation;
 - (c) details the accommodation needs identified by the assessment.
- (2) A local housing authority must submit the report to the Welsh Ministers for approval of the authority’s assessment.
- (3) The Welsh Ministers may—
- (a) approve the assessment as submitted;
 - (b) approve the assessment with modifications;
 - (c) reject the assessment.
- (4) If the Welsh Ministers reject the assessment, the local housing authority must—
- (a) revise and resubmit its assessment for approval by the Welsh Ministers under subsection (3), or
 - (b) conduct another assessment (in which case section 101(2) and this section apply again, as if the assessment were carried out under section 101(1)).
- (5) A local housing authority must publish an assessment approved by the Welsh Ministers under this section.

103 Duty to meet assessed needs

- (1) If a local housing authority’s approved assessment identifies needs within the authority’s area with respect to the provision of sites on which mobile homes may be stationed the authority must exercise its powers in section 56 of the Mobile Homes (Wales) Act 2013 (power of authorities to provide sites for mobile homes) so far as may be necessary to meet those needs.
- (2) But subsection (1) does not require a local housing authority to provide, in or in connection with sites for the stationing of mobile homes, working space and facilities for the carrying on of activities normally carried out by Gypsies and Travellers.
- (3) The reference in subsection (1) to an authority’s approved assessment is a reference to the authority’s most recent assessment of accommodation needs approved by the Welsh Ministers under section 102(3).

104 Failure to comply with duty under section 103

- (1) If the Welsh Ministers are satisfied that a local housing authority has failed to comply with the duty imposed by section 103 they may direct the authority to exercise its powers under section 56 of the Mobile Homes (Wales) Act 2013 so far as may be necessary to meet the needs identified in the authority’s approved assessment.
- (2) Before giving a direction the Welsh Ministers must consult the local housing authority to which the direction would be given.

- (3) A local housing authority must comply with a direction given to it.
- (4) A direction given under this section—
 - (a) must be in writing;
 - (b) may be varied or revoked by a subsequent direction;
 - (c) is enforceable by mandatory order on application by, or on behalf of, the Welsh Ministers.

105 Provision of information upon request

- (1) A local housing authority must provide the Welsh Ministers with such information (and at such times) as they may require in connection with the exercise of their functions under this Part.
- (2) The Welsh Ministers may exercise their powers under this section generally or in relation to a particular case.

106 Guidance

- (1) In exercising its functions under this Part, a local housing authority must have regard to any guidance given by the Welsh Ministers.
- (2) The Welsh Ministers may—
 - (a) give guidance either generally or to specified descriptions of authorities;
 - (b) revise the guidance by giving further guidance under this section;
 - (c) withdraw the guidance by giving further guidance under this section or by notice.
- (3) The Welsh Ministers must publish any guidance or notice under this section.

107 Duties in relation to housing strategies

- (1) This section applies where a local housing authority is required under section 87 of the Local Government Act 2003 to have a strategy in respect of meeting the accommodation needs of Gypsies and Travellers residing in or resorting to its area.
- (2) The local housing authority must—
 - (a) have regard to any guidance given by the Welsh Ministers in preparing its strategy;
 - (b) take the strategy into account in exercising its functions (including functions exercisable other than as a local housing authority).

General

108 Interpretation

In this Part—

“accommodation needs” (*“anghenion llety”*) includes, but is not limited to, needs with respect to the provision of sites on which mobile homes may be stationed;

“Gypsies and Travellers” (*“Sipsiwn a Theithwyr”*) 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;

“mobile home” (*“cartref symudol”*) has the meaning given by section 60 of the Mobile Homes (Wales) Act 2013.

109 Power to amend definition of Gypsies and Travellers

- (1) The Welsh Ministers may by order amend the definition of Gypsies and Travellers in section 108 by—
 - (a) adding a description of persons;
 - (b) modifying a description of persons;
 - (c) removing a description of persons.
- (2) An order under this section may also make such amendments of the Mobile Homes (Wales) Act 2013 as the Welsh Ministers consider necessary or appropriate in consequence of a change to the definition mentioned in subsection (1).

110 Consequential amendments

Part 2 of Schedule 3 makes consequential amendments relating to this Part.



Llywodraeth Cymru
Welsh Government

www.gov.wales

Undertaking Gypsy and Traveller Accommodation Assessments

Guidance



May 2015

Contents

Glossary	3
Chapter One: Introduction	6
Why assess Gypsy and Traveller accommodation needs?	7
Why do Gypsies and Travellers need a separate assessment?	8
Who needs to be consulted through the Accommodation Assessment?	9
What should the accommodation assessment produce?	11
How will it differ from assessing the housing needs of the non-Gypsy and Traveller community?	11
Chapter Two: Carrying out the assessment	13
Preparation and partnership working	14
Project management	14
Appointing Researchers	16
Engaging key stakeholders	18
Analysis of existing data sources	19
Table 1 – Secondary data sources	19
Conducting a specialist survey	21
Identifying the community	21
Table 2 – Engagement Checklist	23
Difficulties in accessing the community	23
Managing expectations	24
Cultural sensitivities	24
Timing of the survey	25
Survey and Qualitative techniques	25
Survey questions	26
Chapter Three: Assessing Accommodation Needs	29
Current residential pitch supply	29
Planned residential pitch supply	30
Current residential demand	31
Understanding ‘Needs’ and ‘Preferences’	32
Understanding the Cultural Aversion	33
Demand for accommodation in alternative local area	34

Demand for accommodation from unauthorised sites	35
Overcrowding	35
Calculating overall residential need	36
Future residential demand	36
Table 3 – An estimate of need for residential site pitches	37
Calculating transit need	39
Chapter Four – Submitting Reports to Welsh Ministers	41
Chapter Five – Making use of the assessment	42
Chapter Six – Review and Update	45
Annex 1 – Relevant Organisations	46
Annex 2 – Questionnaire	50
Annex 3 – Interview Log	60
Annex 4 – Draft Gypsy and Traveller Accommodation Assessment Submission Template	64

Glossary

Definitions of key terms and concepts in this guidance

Gypsies and Travellers	<p>(a) Persons of a nomadic habit of life, whatever their race or origin, including:</p> <p>(1) 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</p> <p>(2) Members of an organized group of travelling show people or circus people (whether or not travelling together as such); and</p> <p>(b) All other persons with a cultural tradition of nomadism or of living in a mobile home.</p> <p>Source: Section 108, Housing (Wales) Act 2014</p>
Residential site	<p>A permanent residential site can be privately owned or owned by the Local Authority. This site will be designated for use as a Gypsy and Traveller site indefinitely. Residents on these sites can expect to occupy their pitches for as long as they abide by the terms of their pitch agreements, under the Mobile Homes (Wales) Act 2013.</p> <p>Working space may also be provided on, or near, sites for activities carried out by community members.</p>
Temporary residential site	<p>These sites are residential sites which only have planning permission or a site licence for a limited period. Residents on these sites can expect to occupy their pitches for the duration of the planning permission or site licence (or as long as they abide by the terms of their pitch agreements, under the Mobile Homes (Wales) Act 2013 – whichever is sooner).</p>
Transit site	<p>Transit sites are permanent facilities designed for temporary use by occupiers. These sites must be designated as such and provide a route for Gypsies and Travellers to maintain a nomadic way of life. Individual occupiers are permitted to reside on the site for a maximum of 3 months at a time.</p> <p>Specific terms under the Mobile Homes (Wales) Act 2013 apply on these sites. Working space may also be provided on, or near, sites for activities carried out by community members.</p>

<p>Temporary Stopping Place</p>	<p>Also known as a ‘stopping place’, ‘Atchin Tan’, or ‘green lane’, amongst other names. These are intended to be short-term in nature to assist Local Authorities where a need for pitches is accepted, however, none are currently available. Pro-actively identified temporary stopping places can be used to relocate inappropriately located encampments, whilst alternative sites are progressed.</p> <p>Temporary stopping places must make provision for waste disposal, water supply and sanitation at a minimum.</p>
<p>Residential pitch</p>	<p>Land on a mobile home site where occupiers are entitled to station their mobile homes indefinitely (unless stated in their pitch agreement). Typically includes an amenity block, space for a static caravan and touring caravan and parking.</p>
<p>Transit pitch</p>	<p>Land on a mobile home site where occupiers are entitled to station their mobile homes for a maximum of 3 months.</p> <p>Transit pitches can exist on permanent residential sites, however, this is not recommended.</p>
<p>Unauthorised encampment</p>	<p>Land occupied without the permission of the owner or without the correct land use planning permission. Encampments may be tolerated by the Local Authority, whilst alternative sites are developed.</p>
<p>Unauthorised development</p>	<p>Land occupied by the owner without the necessary land use planning permission.</p>
<p>Current residential supply</p>	<p>The number of authorised pitches which are available and occupied within the Local Authority or partnership area. This includes pitches on Local Authority or private sites.</p>
<p>Current residential demand</p>	<p>Those with a need for authorised pitches for a range of reasons, including:</p> <ul style="list-style-type: none"> • an inability to secure an authorised pitch leading to occupation of unauthorised encampments; • an inability to secure correct planning permission for an unauthorised development; • households living in overcrowded conditions and want a pitch; • households in conventional housing demonstrating cultural aversion; • new households expected to arrive from elsewhere.
<p>Future residential demand</p>	<p>The expected level of new household formation which will generate additional demand within the 5 year period of the accommodation assessment and longer LDP period.</p>

Overall residential pitch need	The ultimate calculation of unmet accommodation need, which must be identified through the Gypsy and Traveller accommodation assessment process. This figure can be found by adding the immediate residential need to the future residential demand. The overall residential need will capture the needs across the 5 year period within which the accommodation assessment is considered to be robust.
Planned residential pitch supply	The number of authorised pitches which are vacant and available to rent on Local Authority or private sites. It also includes pitches which will be vacated in the near future by households moving to conventional housing or in other circumstances. Additional pitches which are due to open or private sites likely to achieve planning permission shortly should be included as planned residential supply.
Household	In this guidance this refers to individuals from the same family who live together on a single pitch / house / encampment.
Concealed or 'doubled-up' household	<p>This refers to households which are unable to achieve their own authorised accommodation and are instead living within authorised accommodation (houses or pitches) assigned to another household.</p> <p>This may include adult children who have been unable to move home or different households occupying a single pitch.</p>
Household growth	In this guidance household growth is defined by the number of new households arising from households which are already accommodated in the area.

Chapter One: Introduction

1. This Statutory Guidance has been produced to assist Local Authorities in discharging their duties under Part 3 of the Housing (Wales) Act 2014 (“the 2014 Act”). The guidance is published under section 106 of the 2014 Act.

2. Local Authorities are required to undertake a Gypsy and Traveller accommodation assessment (“GTAA”) and to make provision for sites where the assessment identifies an unmet need for mobile home pitches.

3. The aims of this guidance are to set out:

- a. Why a specific GTAA is required?
- b. What should be produced?
- c. Who needs to be consulted?
- d. What data sources need to be reviewed?
- e. Understanding the culture of Gypsy and Traveller communities.
- f. How to identify and communicate with Gypsies and Travellers?
- g. How to design, manage and undertake a GTAA?
- h. Support with partnership working and working regionally.
- i. Exploring specialist surveys, techniques and questions to be used.
- j. How accommodation ‘need’ is assessed?
- k. Submitting reports to Welsh Ministers.
- l. How to make provision for identified need?

4. **Chapter two** will help Local Authorities to consider the geographic scope of their GTAA, outline the development of a project steering group and the design of the study, and how to set out to undertake the study itself. **Chapter three** supports the analysis of the data produced during the study and explains how to calculate needs within the Local Authority area. **Chapter four** sets out the process for submitting reports to the Welsh Ministers for scrutiny and the subsequent feedback and publication. **Chapter five** includes options for Local Authorities to consider when exploring how to make provision for needs identified in the GTAA. Finally, **Chapter six** explains the process of reviewing and updating assessments and associated documents in due course.

5. This guidance also includes a universal questionnaire (Annex 2) to be used during interviews with Gypsy and Traveller communities, though chapter two will explain how this should be approached in more detail.

6. A glossary of important terms used throughout this document is included after the contents page.

7. A list of relevant organisations to assist Local Authorities when undertaking GTAAs is also included (Annex 1).

Why assess Gypsy and Traveller accommodation needs?

8. In the past, the accommodation needs of Gypsies and Travellers have often not been adequately assessed as part of the process by which Local Authorities assess people's housing needs. The consequences of this have been a lack of understanding regarding the current and projected accommodation needs of Gypsies and Travellers.

9. The assessment of Gypsy and Traveller accommodation needs, and the duty to make provision for sites where the assessment identifies need, became statutory requirements under the Housing (Wales) Act 2014. The needs identified in this process should also be included in the wider Local Housing Market Assessment when this is updated to ensure Gypsy and Traveller accommodation needs are mainstreamed within the local housing strategy. A lead agency should be identified to take the assessment process forward, ensuring key progress targets and milestones are met. This should normally be the Local Housing Authority as the strategic housing body. Guidance on Local Housing Market Assessments is available on the Welsh Government website.

10. The definition of 'Gypsies and Travellers' for the purposes of this accommodation assessment process is contained within section 108 of the Housing (Wales) Act 2014. Gypsies and Travellers means:

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

- 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
- members of an organized group of travelling show people or circus people (whether or not travelling together as such); and
- all other persons with a cultural tradition of nomadism or of living in a mobile home.”

11. The intention of the above definition is to ensure ethnic Romani Gypsies and Irish Travellers are included, as well as those from any ethnic group who follow a nomadic habit of life. The definition also includes Travelling Showpeople. New Travellers could also be captured by the definition if they can demonstrate a cultural tradition of nomadism and of living in mobile homes. Members of these communities do not necessarily need to demonstrate a continued nomadic habit of life to be considered to be Gypsies or Travellers for the purposes of this assessment.

12. A broad definition is necessary to achieve a full understanding of the accommodation needs of these communities. Gypsies and Travellers, and their children and other relatives, in bricks and mortar housing may form part of the source from which future site need and aspiration may arise, and it will be essential to understand this. Assessing the needs of housed Gypsies and Travellers will also help identify the ways in which housing may be made to work better for them, and made more attractive to Gypsies and Travellers in general. The intention should not be to encourage these communities to integrate into conventional housing. However, adapted or improved housing could reduce the numbers who leave or wish to leave conventional housing for sites. Some of those currently on unauthorised sites may also wish to move into, or back into, housing if it can better suit their circumstances.

13. Case law has established both Romani Gypsies and Irish Travellers are recognised racial groups for the purposes of the Race Relations Act 1976. These groups continue to be recognised racial groups for the purposes of the Equality Act 2010. The accommodation needs of all Gypsies and Travellers should be identified, understood and addressed through the planning framework and housing strategy on the same basis as other sectors of the community.

14. The Welsh Government's Gypsy and Traveller Framework for Action, *Travelling to a Better Future* (2011), sets out a vision for culturally appropriate accommodation for these communities. The Welsh Government seeks to ensure a wide choice of accommodation type is available to meet the needs of all members of the community. It is reflective of our commitment to ensure equality of opportunity for all sections of the community and in this instance, Gypsies and Travellers should have the same access to culturally appropriate accommodation as all other members of the community.

15. An understanding of Gypsy and Traveller accommodation issues is essential to make properly planned provision and avoid the problems associated with ad hoc or unauthorised provision. A comprehensive accommodation assessment (required under the Housing (Wales) Act 2014) and strategy to meet the need which is identified will greatly strengthen the ability of Local Authorities to respond swiftly and firmly to inappropriate unauthorised developments and encampments and help to avoid future unauthorised camping and development.

Why do Gypsies and Travellers need a separate assessment?

16. Gypsies and Travellers will typically form only a very small percentage of the population in any given area. The Census 2011 included a new ethnic category for 'Gypsy or Irish Traveller' and the data collected suggested a total population of 2,785 in Wales. The total may exclude other members of these communities who declined to self-ascribe their ethnicity for fear of discrimination, stronger affiliation with other ethnicity categories (e.g. White Irish) or for other reasons, though attempts were made by the Office for National Statistics to address these issues. Only a minority of this figure is believed to be living in, or seeking, caravan site accommodation.

17. Cultural differences, a reluctance of some members of these communities to disclose their ethnicity as Gypsies or Travellers, or a disinclination to participate in a process with which they are not familiar, mean the main housing market assessment process is likely to be significantly less successful in accessing this group than others. In addition, the particular lifestyle and culture of Gypsies and Travellers may give rise to distinctive accommodation needs, which the main assessment will be unlikely to pick up.

18. However, these differences should not be exaggerated. Many Gypsies and Travellers are permanently settled in housing or on residential public or private sites. A small percentage of the population are on unauthorised encampments or unauthorised developments. The percentage of the population who are permanently nomadic is believed to be very low. Nevertheless, it is imperative Local Authorities assess the needs of the nomadic population as well as those who are more settled.

19. Some of those living in conventional housing are likely have moved from living in mobile homes due to the lack of legal alternatives, possibly because the Local Authority where they reside had not provided enough site accommodation.

20. Unlike the wider Local Housing Market Assessment, which should be up-dated every two years, the Gypsy and Traveller accommodation assessment must be redone at least every 5 years. Although the Local Housing Market Assessment must be done more frequently, it largely involves the review of secondary data, unlike the more in-depth Census style survey required for Gypsy and Traveller accommodation assessments.

21. The more in-depth Census (or 'primary' data survey) is required to assess the needs of Gypsy and Traveller communities due to their small population size and particular accommodation needs. Using existing statistics (or 'secondary' data) could create unforeseen errors in projections over time. Relying on existing data in relation to Gypsies and Travellers to assess future needs is unlikely to yield results which are statistically robust. This is partially due to the small size of these communities and also because very little existing data exists regarding the accommodation requirements of these communities in each local area.

22. As a result, the Gypsy and Traveller accommodation assessment will require a primary survey to be undertaken (acquired through a census-style approach), in addition to a review of the available existing data. This process will be explained in more detail in **Chapter two**.

Who needs to be consulted through the Accommodation Assessment?

23. With reference to the definition of Gypsies and Travellers stated above, Local Authorities must ensure the various communities within its scope are directly consulted and needs assessed. This may include (but is not limited to) Romani Gypsies, Irish Travellers, New Travellers, and Travelling Showpeople who are residing in or resorting to their area.

24. Most Gypsy and Traveller accommodation assessments have sought to consult Romani Gypsy and Irish Traveller communities in their area, however, often this has been restricted to those living on authorised sites. The needs of those on unauthorised sites and those living in bricks and mortar housing must also be assessed through direct consultation.

25. In some parts of the country New Travellers form a significant minority of the travelling population. Although these people have adopted a nomadic lifestyle relatively recently, their needs should be assessed alongside those of the more traditional Gypsy and Traveller groups. To do otherwise would be to neglect the needs of part of the community, leading to potential homelessness or unauthorised sites and potential legal challenges. It should be noted Travelling Showpeople, travelling together as such, are not excluded from this definition. Where there is a need for winter quarters for this group, Local Authorities should assess this need as part of the Gypsy and Traveller accommodation assessment, as many of their accommodation issues will be similar.

26. Local Housing Authorities must be able to demonstrate they have consulted directly with as many members of these communities residing in or resorting to their area as possible, through a census approach. Reviewing data sources (as outlined in **chapter two**) and liaising with Gypsy and Traveller support organisations (**Annex 1**) to identify and engage with community members will support this aim.

27. An interview log should be kept to demonstrate the assessment process has sought to engage with all known Gypsies and Travellers in the area. It should be clearly stated as part of a log of interviews with community members if repeated efforts to engage with community members have failed. Reasons for non-participation should also be recorded where available. A draft interview log has been provided at **Annex 3**.

28. Welsh Ministers may request this interview log when considering whether to approve or reject Local Authority Gypsy and Traveller accommodation needs assessments, if it is not submitted in the first instance.

29. To ensure the estimate of pitch need is robust, it is essential as many responses as possible are received from community members. Local Authorities should ensure they follow the 'engagement checklist' (**Table 2 – Engagement Checklist**) to ensure they reach as many community members as possible.

30. It may not always be clear-cut where a particular group falls within the definition of Gypsy and Traveller in section 108 of the Housing (Wales) Act 2014. However, section 8 of the Housing Act 1985 requires every Local Housing Authority to consider the needs of the area with respect to the provision of further housing accommodation and, for that purpose, to review any information which has been brought to their notice. Therefore, if the Local Authority decides the accommodation needs of a particular group should not be assessed under this guidance in the context of GTAAs, they are nonetheless under a duty to review those needs as part of the wider 'section 8' requirement.

31. The inclusion of someone in the survey as a Gypsy or Traveller within the definition set out in paragraph 10 above does not, in itself, imply a person **should** live on a site. However, the Housing (Wales) Act 2014 has consolidated the definition of 'Gypsies and Travellers' with the Mobile Homes (Wales) Act 2013, which means all such individuals should be considered as having '**Gypsy Status**' in planning terms.

32. If identified need for Gypsy and Traveller pitches has been established, Local Housing Authorities will continue to be responsible for the allocation of pitches on sites. Local Housing Authorities may consider a variety of ways in which pitch needs could be met, including:

- Socially rented site accommodation (Local Authority or Registered Social Landlord operated sites);
- Private Gypsy and Traveller site accommodation;
- Sites created through Community Land Trusts.

33. If a need for Gypsy and Traveller pitches is identified, the Local Authority will need to consider how to make the necessary provision (as outlined in **Chapter five**).

34. The following groups may be particularly likely to give rise to pitch need:

Mobile Home dwelling households:

- who have no authorised site anywhere on which to reside;
- whose existing site accommodation is overcrowded or unsuitable and are unable to obtain larger or more suitable accommodation;
- who contain households who are unable to set up separate family units and who are unable to access a place on an authorised site or develop their own site.

'Bricks and mortar' dwelling households:

- whose existing accommodation is overcrowded or unsuitable ('unsuitable' in this context includes unsuitability by virtue of psychological aversion to bricks and mortar accommodation);
- which contain concealed households who are unable to set up separate family units and who are unable to access suitable or appropriate accommodation.

35. It should also be recognised the shortage of sites and local hostility to site planning applications, as well as lack of income, may prevent Gypsies and Travellers exercising their free choice in the accommodation market – and there may, in fact, be no ‘local accommodation market’ in sites.

What should the accommodation assessment produce?

36. The aim of the assessment is to provide data which will identify Gypsy and Traveller pitch needs separately from wider demand and aspiration.

37. Local Authorities must submit their GTAA to Welsh Ministers, who will then scrutinise and decide whether to approve or reject them. Approved accommodation assessment reports must then be published.

38. The completed GTAA should equip Local Authorities with all the relevant data to inform their local housing strategy and Gypsy and Traveller site provision policies in their Development Plan.

39. An assessment of Gypsy and Traveller accommodation needs will mean they will be understood and can be set out alongside other housing needs. Just as for the rest of the community, needs assessments are primarily required to understand and meet need, not simply demand or aspiration.

How will it differ from assessing the housing needs of the non-Gypsy and Traveller community?

40. The assessment aims for Gypsies and Travellers will be the same as for other sectors of the community. However, the shortage of Gypsy and Traveller accommodation, as well as the distinctive lifestyle and culture of Gypsies and Travellers, will mean the process for undertaking the review is substantially different. Unlike other sectors of the community, Gypsies and Travellers reside in three main types of accommodation:

- bricks and mortar housing;
- authorised Local Authority or private mobile home sites; and
- unauthorised sites (either unauthorised encampments, on land they do not own, or unauthorised developments, on land they do own).

41. The accommodation needs of Gypsy and Traveller communities may differ from the rest of the population because of:

- their nomadic or semi-nomadic pattern of life;
- the caravan-dwelling culture of some;
- movement between housing and caravans;
- their presence on unauthorised encampments or developments.
- patterns of extended family living.

42. Mobility between areas may have the following implications for carrying out an assessment:

- the possibility of working on a regional level in both carrying out assessments and delivering solutions to site provision;

- the timing of the accommodation assessment for Gypsies and Travellers will need to be considered (see paragraph 114);
- different questions may need to be asked (see Annex 2);
- different data sources may need to be used (see paragraph 85).

43. It is important to consider:

- How you identify and engage with those to be surveyed (see paragraph 91);
- How interviewers put questions (see paragraph 116).

44. If your authority has little knowledge of, or reliable data on, Gypsies and Travellers, it is even more important groups supporting these communities are engaged to ensure the assessment is as precise as possible. After the initial GTAA has been completed in 2015/16, the process must be redone at least every 5 years to ensure the evidence remains robust. Local Authorities are able to undertake GTAAs more frequently than this if they choose to do so. This is discussed further in **Chapter Six – Review and Update**.

45. It is also recommended local Councillors are made aware of the requirement to conduct a GTAA and of this guidance. Providing Gypsy and Traveller sites can be a sensitive issue within communities and it may be helpful to ensure Council members are fully briefed at an early stage.

Chapter Two: Carrying out the assessment

Preparation and partnership working

46. The degree of sensitivity which often surrounds Gypsy and Traveller issues will make it very important to achieve buy-in for the accommodation assessment process, from local politicians and the settled community. If the process is not seen as legitimate, it will be much harder to get support for the later stages of providing Gypsy and Traveller sites. The risk of the process being seen as illegitimate needs to be carefully considered when designing the study, as this data will form crucial evidence when assessing future site applications and the Local Development Plan (LDP). It is essential the process also has credibility and acceptance within the Gypsy and Traveller community. If not, it may be difficult to engage community members and the accuracy of the assessment will be undermined.

47. The Local Authority is responsible for deciding who the lead agency should be to take the assessment process forward. This should normally be the Local Authority itself, usually either the Housing or Planning Department. Whoever is appointed should ensure the Housing and Planning Departments work closely together, have suitable seniority to take ownership of the outcome, and ensure policies are adopted across the Local Authority as a whole.

48. While the responsibility to carry out the assessment rests with individual Local Authorities, it is possible to work in partnership with others. The potential benefits of such an approach are particularly relevant in relation to the Gypsy and Traveller community because of their mobility and travelling patterns, which are liable to cross Local Authority boundaries, and which must be understood if appropriate transit provision is to be made. Working in regional partnerships may save costs and improve the data available to assess need.

49. All Local Authorities in Wales must undertake their first accommodation assessments under the Housing (Wales) Act 2014 within 12 months of commencement. This provides authorities with a unique opportunity to work together to produce regional assessments of pitch needs. Nevertheless, Local Authorities have the flexibility to decide to undertake individual GTAAAs or regional GTAAAs.

50. Partnership working should aim to deliver:

- a better understanding of the need across the administrative boundaries;
- a better understanding of travelling patterns;
- a common approach and consistency across the area;
- economies of cost and scale;
- reduced risks of double counting;
- opportunities to work together to devise a concerted and strategic approach to Gypsy and Traveller mobile home site shortages and enforcement against unauthorised sites.

51. If Local Authorities are keen to produce regional GTAAAs, early discussions must take place with other Local Authorities in the region to identify the scope for partnership working, and the most appropriate areas to be involved. Any delays in the process of undertaking the GTAA or adopting its findings could put Local Authorities at risk of breaching their statutory duty to submit the GTAA to Welsh Ministers within specified time limits in the Housing

(Wales) Act 2014. Therefore, early agreement of the process for commissioning and adopting the findings of GTAAs is essential in any regional partnership.

52. When assessing which areas should cooperate to understand regional needs, Local Authorities should have regard to the knowledge and experience of their officers and members of the local Gypsy and Traveller communities. The area to be covered should largely depend on travel and movement patterns within the region or where existing sites are situated close to administrative boundaries, which community members will be able to explain. The involvement of key individuals from Gypsy and Traveller communities at an early stage in these discussions will help to inform the partnership area which would produce most effective results.

53. It is essential the data arising from jointly conducted assessments remains capable of disaggregation to the Local Authority level, to ensure each partner retains ownership of its own information base and can produce this information in circumstances involving Development Plan hearings, a planning inquiry or appeal specific to the situation within each individual Local Authority.

54. Where National Park Authorities exist within the Local Authority area, the data must be capable of disaggregation within and outside the National Park Authority boundary. This is because the National Park Authorities are also required to produce Development Plans and the GTAA will provide evidence to underpin each plan.

55. Local Authorities are also required to submit accommodation assessments for approval of Welsh Ministers, which identify the needs within the specific Local Authority area. The duty to undertake GTAAs, under Part 3 of the Housing (Wales) Act 2014, rest with individual Local Authorities, rather than regional partnerships. Therefore, Local Authorities have the power to undertake GTAAs independently if they feel it would be more appropriate or practical to do so.

Project management

56. A steering group for the work will help to ensure the process is informed by all available expertise to produce the most effective assessment possible. It is important key stakeholders are aware and involved at an early stage. Fundamentally, the group should be composed of those who have established networks within these communities and those with accountability for meeting the accommodation needs of these communities. These may include representatives from:

- Local Authority Housing and Planning Departments;
- Local Gypsy and Traveller community;
- organisations working to support Gypsy and Traveller communities (**Annex 1**);
- other relevant services such as Traveller education services, Gypsy and Traveller liaison officers or health board officers who work closely with Gypsy and Traveller communities and may have the best knowledge of communities in the area; and
- Local Authority Councillor, for example, the Equality or Planning portfolio holder.

57. It may also be useful to include someone with detailed knowledge of the GTAA in adjoining geographical areas.

58. The involvement of members of the local Gypsy and Traveller communities is an important part of the steering group composition and should not be omitted or delayed. Their involvement should help to counter perceptions the study is being done ‘to’ Gypsy and Traveller communities, rather than ‘with’ them. Their involvement may also provide a crucial perspective on the travelling patterns of communities and the need (or otherwise) to work on a regional basis. It will also strengthen opportunities for the study to be well publicised amongst community members and explore the best way of engaging community members to gather the required information.

59. Some Gypsy and Traveller community members may be reluctant to participate in the primary survey due to past experiences of being interviewed without the subsequent development of necessary sites. Involving community members in the steering group should help to reassure some regarding the likelihood of the GTAA yielding a positive result.

60. When selecting community members to participate in the steering group, community members themselves could be given an opportunity to nominate well-respected individuals. Organisations who work closely with these communities could also nominate those who they believe would be able to support the steering group aims. Although the views of these community members will not be representative of everyone, they may offer a different perspective as members of the community whose accommodation needs are being assessed. Furthermore, community members may be able to provide some advice on the appropriateness of proposed engagement techniques, expected questions emanating from the community and ways to manage expectations. Gypsy and Traveller representation on the steering group is likely to form a minority. However, the Local Authority should endeavour to ensure their views are given due weight as they are more likely to be able to advise on their own communities.

61. In areas with a small Gypsy and Traveller population it may not be possible to achieve steering group representation from these communities. However, the likely value arising from having such members of the group should persuade Local Authorities to exercise its influence as far as possible to engage community members. It may be easier to achieve participation through education or health members of the steering group, who are likely to have more established links.

62. The steering group should have a range of responsibilities, including:

- a. recommending the survey area;
- b. design the study aims and outcomes;
- c. appoint the researchers (in-house or external);
- d. publicising the study to stakeholders;
- e. providing local knowledge to the researchers;
- f. providing feedback to consultation participants and stakeholders;
- g. ensuring results are taken seriously and acted upon.

63. Once the extent of the survey area, and any collaboration with other Local Authorities, has been decided the steering group should identify the aims and outcomes which it hopes to derive from the accommodation assessment. Key outcomes will include compliance with the Local Authority duties under the Housing (Wales) Act 2014, and to understand the accommodation needs of Gypsies and Travellers, including the need for mobile home pitches which must be provided in the area. There may also be other aims which steering group

members wish to pursue. For example, understanding how changes to a particular public service would affect the local Gypsy and Traveller community.

64. The Local Authority should utilise the universal questionnaire at **Annex 2** to ensure key data can be analysed. However, the steering group may wish to consider adding additional optional questions to the end of the questionnaire to capture any locally specific data to achieve other outcomes. It is recommended any longer questionnaire is piloted with community members to ensure the length of the interview does not jeopardise participation.

65. Establishing clear outcomes will support the steering group in appointing researchers to undertake the evidence gathering and data analysis sections of the accommodation assessment. The researchers can be in-house staff or external consultants. More information on appointing researchers can be found from paragraph 71.

66. Once researchers have been appointed, the steering group should focus on providing support. Firstly, they should utilise their networks within relevant Local Authority departments and Gypsy and Traveller communities to ensure the GTAA is well publicised and all interested community members know how they can participate.

67. The steering group should also seek to ensure the researchers are provided with all relevant local knowledge and contacts to ensure they can produce a complete study of accommodation needs of the Gypsy and Traveller communities in the area. Local Authorities will need to consider and comply with data protection issues and any restrictions on sharing data.

68. After the researchers have completed the study and analysed the results, the steering group should ensure feedback is provided to all participants and stakeholders (in compliance with data protection restrictions). Without accessible feedback, the participation of community members risks being viewed as tokenistic rather than meaningful as individuals are not able to see how their involvement has influenced local policy. Worse still, a lack of feedback can be counter-productive as the same individuals may decline to participate in subsequent consultation processes because of a perception that “nothing ever changes.”

69. Finally, one of the steering group’s most important roles should be to assist the Local Authority to meet its statutory duty to provide the necessary Gypsy and Traveller sites. The steering group will draw together the key organisations and individuals to ensure there is accountability for Local Authority progress.

70. If the steering group has achieved a balanced composition of strategic managers and officers from the Local Authority, Gypsies and Travellers, and support organisations for these communities, there should be enough accountability to ensure the assessment results will be fully addressed. Where a GTAA has identified unmet Gypsy and Traveller site need and Welsh Ministers are satisfied the Local Authority has failed to comply with its duty to meet the need, the Local Authority may be directed to do so.

Appointing Researchers

71. Once the survey area and aims have been decided, researchers will need to be appointed to conduct the accommodation assessment study. Options include the use of:

- in-house staff – preferably either within the Gypsy and Traveller section or the housing department of the Local Authority; or
- consultants.

72. It may be sensible for different groups to be involved at different times – for example, in-house staff reviewing the existing data, and specialists being brought in to conduct census style interviews with Gypsies and Travellers. Local Authorities may wish to conduct in-house assessments to strengthen their ongoing relationship with local communities.

73. Where consultants are employed, particular care should be taken to ensure all parties have a clear and detailed understanding of what service the consultant is expected to provide, the methodology to be used and the outcome to be delivered.

74. Some organisations supporting Gypsies and Travellers have begun tendering to undertake GTAAs due to their experience of engaging with these communities and their ability to identify otherwise hidden populations.

75. Consultants can range from social research companies to Gypsy and Traveller support organisations or academic institutions. Each may have particular strengths which could support the development of the accommodation assessment.

76. In reaching a decision, Local Authorities will wish to consider:

- the capacity and expertise of in-house staff;
- the qualifications and track record of consultants, including evidence interviewers have undertaken cultural-awareness training;
- how effective each option might be in reaching the target group (e.g. previous relationship with Gypsy and Traveller communities or whether the use of Gypsies and Travellers themselves may be useful to obtain access to the community and secure the trust of those being assessed);
- the ability to analyse primary and secondary data (with the use of this guidance) to assess accommodation needs;
- the perceived robustness of the process, which will be vital for securing public acceptance of the results;
- the credibility of each option with both Gypsies and Travellers and the settled community;
- resources and costs.

77. Each of these factors are important considerations when assessing commissioning options. Local Authorities should consider making use of organisations and individuals who are trusted by the local Gypsy and Traveller communities as this is likely to yield a higher rate of participation and more engaged responses to the questionnaire. It may be possible to contract a trusted organisation to undertake the interviews, whilst maintaining Local Authority responsibility for analysing the survey responses.

78. It is likely each Local Authority will have additional factors which need to be satisfied. The cost of undertaking the assessment is an important consideration, however, Local Authorities should consider the engagement of communities and robust analysis will be scrutinised by Welsh Ministers before the assessment can be adopted. Furthermore, the assessment will eventually be used as evidence to support and be incorporated within the Development Plan, so must be as robust as possible.

79. The results, conclusions or strategies arising from the assessment may potentially become subject to challenge or judicial review. A properly conducted assessment process and clearly evidenced policies to address the outcomes will help to ensure the Local Authority's actions and decisions are as robust as possible.

80. As GTAA's (and resulting policies in Development Plans) are scrutinised during the planning process, it is important to pay attention to how the agreed process will be perceived.

Engaging key stakeholders

81. Key stakeholders should already be included as part of the project steering group. Nevertheless, wider consultation on the design and conduct of the assessment should also be undertaken with local agencies and the local Gypsy and Traveller communities. This process will involve mapping the local Gypsy and Traveller communities to ensure the researchers engage as many people as possible. It will also require testing of the survey methodology, including proposals regarding who will attend to ask questions, when interviews will be scheduled to take place, the appropriateness of questions, and the most effective phrasing to support maximum understanding. The Gypsy and Traveller accommodation assessment questionnaire can be found at Annex 2.

82. It is crucial the purpose of the work is fully explained to the Gypsy and Traveller communities before the survey begins. The intention is to help to secure support and buy-in for the process. The Welsh Government will be developing a short film resource during spring 2015 to assist interviewers to explain the value of participation to Gypsies and Travellers. The purpose of the data gathering should be made clear and it should be emphasised the data will only be used for the purposes of assessing and meeting accommodation needs. Where aspirations involve households moving between Local Authority boundaries, households should be given the opportunity to consent for their data to be shared for the specific purpose of discussing needs with other authorities. Local Authorities should consider issuing these households with a privacy notice outlining how their data will be held and processed.

83. It should also be made clear that while the information provided will be used to inform decisions on site provision, and will provide a benefit to the community as a whole, the Local Authority is not committing to meet all the perceived aspirations expressed in the survey. On some occasions the Local Authority will be required to balance 'needs' and 'preferences' and this is discussed further in paragraph 166. It is important stakeholders are informed of the progress and outcome of the assessment. This feedback will ensure community members understand how their views have been taken into account and will add accountability to the process.

84. The GTAA methodology will be informed by this guidance and the testing process mentioned in paragraph 81 and will comprise of three main components:

- an analysis of existing data sources;
- conducting a specialist survey;
- assessing accommodation needs.

Analysis of existing data sources

85. Some information is currently held by Local Authorities or other agencies, and can be used to inform the assessment, although given the small population size, care will need to be taken to ensure no individuals are identifiable.

Table 1 – Secondary data sources

<p>Census 2011</p>	<p>The Census 2011 included an ethnicity category for 'Gypsy or Irish Traveller' for the first time. The data suggests a total population of 2,785 Gypsies and Travellers across Wales. However, this number may not include Travelling Showpeople or New Travellers. The total may also exclude other members of these communities who declined to self-ascribe their ethnicity for fear of discrimination, stronger affiliation with other ethnicity categories (e.g. White Welsh; White Irish) or for other reasons though attempts were made by the Office for National Statistics to address these issues.</p> <p>This data has been disaggregated to the Local Authority level by the Office for National Statistics. Data is also available to show how many households live in each area and in which type of accommodation.</p>
<p>Housing records</p>	<p>In areas with Local Authority Gypsy and Traveller sites, Information should be available from site management records. These may provide useful information regarding pitch turnover, pitch waiting lists and pitch assignment applications.</p> <p>Registered Social Landlords may also have data relating to Gypsy and Traveller residents or those on waiting lists. Supporting People staff may have access to information which may help to identify community members to be interviewed.</p> <p>As with other Local Authority housing records and waiting lists, this data may be out of date or incomplete and the households recorded cannot be considered to be representative of the Gypsy and Traveller community as a whole.</p>
<p>Local Authority Planning records</p>	<p>Information relating to private authorised sites will be available to the Local Planning Authority through the planning application process. This should include the number of caravans/pitches permitted on each site, whether the planning permission was granted on a permanent or temporary basis, and whether it restricted occupancy to named individuals.</p> <p>Local Authorities should also gather data on unauthorised developments in their area. This should include the number of caravans or pitches on each site, and planning applications, appeals and/ or enforcement action over the previous 5 years. This data may be out of date or incomplete. Nevertheless, it can be used with other information to help indicate the adequacy of current site provision and the extent of need for sites. Any use and interpretation of these figures should clearly note the limitations of the data.</p>

<p>Caravan Count</p>	<p>Historically, the Caravan Count has been a biannual snapshot of Gypsy and Traveller caravans within the Local Authority area. However, from Spring 2015 the Caravan Count will be developed into an all year log of unauthorised camping across Wales, in addition to the usual biannual data on authorised sites. This will provide Local Authorities with much better data regarding the frequency, location, size and type of unauthorised sites they experience and help them to better plan to meet needs.</p> <p>Local Authorities will include the number of caravans on all types of site, including authorised private or public sites and unauthorised encampments or developments. The Count, however, does not provide information on households' needs, wishes, aspirations or incomes. In addition, it does not include any Gypsy or Traveller who is living in a house. Though the data has clear limitations it can help to provide a starting point for mapping these communities.</p>
<p>Traveller education records</p>	<p>Local Authorities may also have additional sources of data regarding local Gypsy and Traveller populations, subject to personal confidentiality safeguards, via service providers, such as health service providers and the Traveller Education Service (TES). The TES will have information on Gypsy and Traveller pupil numbers via the Pupil Level Annual School Census (PLASC) and other records. This data appears to record a higher level of Gypsy and Traveller population than the Census 2011.</p>
<p>Liaison officers / Support organisations</p>	<p>Gypsy and Traveller Liaison Officers or organisations supporting these communities may well have much more detailed personal knowledge of the community, and Local Authorities or partnerships should draw on this when designing and carrying out their assessment (Annex 1).</p>
<p>Departments with regular contact with Gypsies and Travellers should consider obtaining consent for data sharing for the purposes of accommodation assessments. As with all personal data, any transfer will need to comply with the Data Protection Act and any specific legislation relating to the use of certain data.</p>	

86. However, for Gypsies and Travellers there is likely to be very little secondary data available. Although 76% of Gypsy and Traveller communities (Census – England and Wales data, 2011) are thought to be residing in bricks and mortar, local housing records are unlikely to identify who or where they are. Ethnic monitoring categories often do not identify Gypsies and Travellers separately, and where they do, Gypsies and Travellers in housing may be reluctant to identify themselves as such. Local Authority housing waiting lists may not be well used by the Gypsy and Traveller community, as many Gypsies and Travellers may not be looking for bricks and mortar housing. Useful data may be available if Local Authorities operate waiting lists which allow households to specify a need for mobile home pitches. If Local Authorities do not currently operate such waiting lists, they will be expected to amend their policies to evidence their attempts to engage with Gypsy and Traveller communities (see Table 2 – Engagement Checklist).

87. The records held by other service providers cannot be assumed to be comprehensive either, as they will only record those accessing the service, and it is known Gypsies and Travellers frequently do not take up available services, for a variety of reasons¹.

88. Existing data alone will not be sufficient in carrying out an accommodation assessment. As such assessments produced only utilising existing data will not be considered to be comprehensive or detailed enough for approval by Welsh Ministers. This data will only give approximations of need and will provide no specific information in relation to needs and preferences for sites or housing.

89. Fuller information is needed to ensure Gypsy and Traveller accommodation need is adequately identified. Nevertheless, a proper review of the existing secondary data should provide researchers with a good knowledge base, including how they are likely to identify community members. Therefore the Local Authority should conduct a specialist survey to obtain further, more detailed, information.

Conducting a specialist survey

90. Undertaking a specialist survey for Gypsy and Traveller communities is likely to involve a unique approach to assessing accommodation needs in the Local Authority area. To achieve the most accurate data and supported conclusions, Local Authorities or partnerships will need to undertake a census style approach to assessments. Local Authorities will need to identify known Gypsies and Travellers in their area and seek to survey each household's accommodation needs. It is crucial those undertaking the assessment endeavour to include all known Gypsies and Travellers residing in or resorting to the area to ensure the assessment is seen as legitimate by all and provides the most accurate assessment of unmet need.

Identifying the community

91. When designing the survey, Local Authorities should consider how they are likely to identify Gypsy and Traveller communities living in various types of accommodation. Those undertaking surveys must aim to interview at least one representative from each household and not rely on a response from one person from each site. This is required for a variety of reasons, including ensuring information is accurately recorded and to ensure individuals do not become gatekeepers for the whole community or misrepresent accommodation needs of others.

92. Local Authorities' best quality data will be held regarding Gypsies and Travellers on existing Local Authority sites. These community members are also likely to be the easiest group to identify and approach. It is important the accommodation needs of concealed (or 'doubled up') households sharing pitches are also considered. The needs of the concealed household should be assessed separately to the needs of household who are agreed tenants of the pitch or house.

93. Other existing authorised sites should be known to Local Authorities through the planning process or local knowledge. Approaching these community members should not be any more difficult, though there may be increased suspicion of Local Authority officers where there has been a lack of previous engagement.

¹ For example, The Race Equality Foundation / Zoe Matthews, 'The Health of Gypsies and Travellers in the UK' (2008)

- 94.** Local Authorities are less likely to have complete knowledge of community members living in conventional bricks and mortar housing. Some Local Authorities may have established Gypsy and Traveller specific pitch waiting lists or may record ethnicity on their wider social housing waiting lists. However, even this data is likely to be incomplete. Authorities should work with specialist professionals (such as Traveller Education Services, specialist health visitors or Gypsy and Traveller liaison officers) and community support organisations (**Annex 1**), where applicable, to better identify and notify these community members.
- 95.** Gypsies and Travellers on unauthorised encampments or developments may be identified via the Caravan Count or through monitoring undertaken by the Local Authority, or by court proceedings relating to possession. Those on unauthorised encampments may be well known to the Local Authority, as regular and perhaps tolerated visitors, or may be less well known and less easy to identify. It will be especially important to explain to these occupiers the GTAA survey seeks to understand the need for both residential and transit pitches. Even where occupiers of unauthorised encampments have declined to participate in the survey, their reason for the encampment should have already been recorded through the unauthorised encampment log component of the Caravan Count and can be included in the GTAA through the analysis of existing data sources.
- 96.** Achieving responses from occupiers of unauthorised developments is likely to be very difficult. This is because occupiers may suspect information is being collected to take enforcement action against the development, rather than to genuinely understand needs. In order to help address this issue, it would be beneficial for Local Authorities to provide clear reassurance of their intentions and to stress this is not the purpose of the survey. In many instances, the use of intermediaries trusted by the community for these interviews may work more effectively. Gypsy and Traveller members of the steering group are likely to know where unauthorised development exist within the area and may have some useful suggestions for how to engage these households.
- 97.** Researchers should maintain a log of appointments and interviews with community members to ensure they can demonstrate consultation has been extensive. Where community members decline to participate in the survey, researchers should record this and the reasons for non-participation (if given). Researchers should attempt to engage with households on three occasions if they have been unsuccessful previously. They should record the date and time of these attempts on the interview log and the approach taken to try to engage the household (e.g. advance notice of appointment, unannounced visit, introduced by trusted intermediary etc). The interview log is at Annex 3. Local Authorities may decide to amend the interview log template for use in their area. However, any personally identifiable data should be removed from the version which is submitted to the Welsh Government.
- 98.** Local Authorities or appointed researchers should always seek to engage as many households as possible in the specialist survey. This would mean one person from each known Gypsy and Traveller household has been interviewed or has actively declined to participate in the GTAA survey. However, it is recognised achieving participation from all households is unlikely to occur.
- 99.** It is important Local Authorities are able to demonstrate they have followed the 'engagement checklist' below to ensure they have reached as many households as possible through the GTAA process. In addition, the interview log (**Annex 3**) should be completed to show where attempts to engage known households have failed. Welsh Ministers will check compliance with the checklist when assessing whether to approve the submitted GTAA.

Where it has not been possible to include elements of the checklist, this should be explained when the GTAA is submitted to the Welsh Government.

Table 2 – Engagement Checklist

1.	Visit every Gypsy and Traveller household identified through the data analysis process up to 3 times, if necessary.
2.	Publish details of the GTAA process, including contact details to allow community members to request an interview, on the Local Authority website, Travellers' Times website and World's Fair publication.
3.	Consult relevant community support organisations, such as those in Annex 1.
4.	Develop a Local Authority waiting list for both pitches and housing, which is accessible and communicated to community members.
5.	Endeavour to include Gypsies and Travellers on the GTAA project steering group.
6.	Ensure contact details provided to the Local Authority by community members through the survey process are followed up and needs assessed.
7.	Consider holding on-site (or nearby) GTAA information events to explain why community members should participate and encourage site residents to bring others who may not be known to the Local Authority.

Difficulties in accessing the community

100. Even where the local Gypsy and Traveller community has been identified, approaching the community to undertake a specialist accommodation assessment survey may not be straightforward. There may be a reluctance to provide information, or a suspicion regarding the purposes to which the information will be put. Some Gypsies and Travellers may be unwilling to co-operate. Officers or support organisations who have the trust of the community, along with Gypsy and Traveller representatives, can play an important role in preparing the ground, explaining the purpose of the survey and introducing researchers.

101. Community members could also play a part in mapping the community within the Local Authority or partnership area.

102. Local Authorities should consider holding community involvement events to ensure the purpose and nature of the accommodation assessment is well understood and publicised. These events should be held in locations which are accessible for the majority of local community members to attend. This may involve the use of any community facilities on authorised sites or nearby community facilities which are used by these communities. Community members should be encouraged to bring along relatives or friends living off site who would be interested in obtaining an authorised pitch. In Local Authorities without an authorised site or small Gypsy and Traveller population, community involvement days may not be practical.

103. Local Authorities should also promote participation in the study through community support organisation websites, social media channels and well-known community publications, such as *Travellers' Times* and *World's Fair* (Travelling Showpeople only).

104. It is vitally important community members are told and understand the provision of additional sites in the area is unlikely to occur without the participation of as many Gypsies and Travellers as possible. If Local Authorities are able to evidence they have undertaken a thorough mapping of Gypsy and Traveller communities in their area and fulfilled the engagement checklist criteria, they will be more likely to be able to defend the robustness of their GTAA at planning inquiries. If these steps are followed, the burden of responsibility for registering an interest in obtaining an authorised pitch should lie with Gypsy and Traveller households themselves.

Managing expectations

105. In conducting the survey it should be emphasised to those taking part this exercise is designed to gain a clearer understanding of the scale of Gypsy and Traveller pitch needs, which the Local Authority is required to address, and to help it develop a strategy to meet it. However, the assessment does not place an obligation on the Local Authority to provide accommodation to the specific individuals who have been interviewed as part of the study. The allocation of available authorised pitches is a matter for Local Authorities to decide through their other housing functions. Nevertheless, the universal questionnaire at **Annex 2** includes a question which allows individuals to request to be included on the local waiting list for a mobile home pitch or housing.

106. There is also no obligation on the Local Authority to address all the needs identified in the assessment, or in precisely the way respondents have stated as a preference. The duty following the assessment relates to providing mobile home pitches to meet the identified need. Furthermore, where a Local Authority identifies accommodation aspiration or preferences, without the need for pitches, there is no requirement upon the authority to meet these needs. However, in some circumstances the Local Authority may wish to do so regardless – for example, to vacate social housing occupied by Gypsy or Traveller families who have expressed a desire for a pitch. Striking the right balance between preferences and needs may not always be simple and is discussed further in Chapter Three – Assessing Accommodation Needs.

107. Interviewers are urged to ensure participants understand these issues and even where need is established and sites are required, sites can take years to be developed.

Cultural sensitivities

108. Cultural sensitivities should be carefully researched and considered during the design of the survey. Any changes to the wording of the questionnaire due to cultural sensitivities need to be carefully considered. This is because changes may undermine the future comparison and use of survey data. The Welsh Government recommends the questionnaire is not amended unless there is a pressing cultural reason to do so. Any changes should be explained when submitting the GTAA to the Welsh Government.

109. However, there may be significant cultural sensitivities to consider when deciding how to administer the survey. For example, the gender of the interviewer, the time of the interview or location of the interview might be considerations which should be discussed with the communities themselves.

110. There may be cultural sensitivities which may affect the willingness of some individuals to participate. For example, some women may not be comfortable being interviewed alone in their mobile homes by male researchers. Where extended families are interviewed together, individuals should still be given the opportunity to respond separately and in confidence if they wish.

111. Cultural sensitivities can be overstated. Nonetheless, it is important for Local Authorities to consider the potential for offence caused by interviewers with little understanding of the communities they are working with. It is recommended all interviewers undertake Gypsy and Traveller cultural-awareness training prior to undertaking any interviews.

112. It is important to recognise the survey may involve interviewing members of several different communities, with different cultural norms and practices. Therefore, when seeking to understand sensitivities researchers need to engage members of each community or the most relevant community support organisations.

113. It is also recommended Local Authorities consider providing training for Elected Members prior to undertaking the GTAA, particularly any Councillors involved in the steering group, Planning Committee or Committee which will scrutinise the GTAA.

Timing of the survey

114. Careful consideration should be given to the appropriate timing for the survey. Seasonal changes should be taken into account when deciding the timing of the survey. The Local Authority or partnership will need some knowledge of travelling patterns of the local Gypsy and Traveller population before a decision can sensibly be made. For example, it may be easier to access local Gypsies and Travellers during the winter months if they are highly mobile in the summer. If, on the other hand, they come from outside the area, the survey will need to be carried out during the summer if their needs are to be assessed. Account should also be taken of the fact some Gypsies and Travellers normally resident in the area may be away travelling themselves during summer months. The Gypsies and Travellers and support organisations represented on the project steering group and those who administer the Caravan Count may be well-placed to provide advice.

115. Where neighbouring Local Authorities are aware their Gypsy and Traveller populations regularly move across administrative borders it is recommended they consider undertaking their GTAAs regionally or at a mutually agreed time to avoid the potential for double-counting and to determine the most suitable location for sites. This may also include determining the most environmentally sustainable site across the region.

Survey and Qualitative techniques

116. Traditional survey techniques, such as sending a mailshot to random addresses, are very unlikely to deliver sound results. Gypsies and Travellers may be even less likely to respond to a survey than other groups. Reasons for this include:

- a. high or seasonal mobility;
- b. cultural differences may mean questions are regarded as sensitive or there is distrust of the process;
- c. lower levels of literacy within certain communities.

117. Given the need to build trust and to ensure high levels of participation, interview surveys are more appropriate as they tend to yield much higher response rates and more reliable data from these communities.

118. Where possible it is useful to achieve equal gender representation among interviewees. Various techniques can be used to try to encourage greater participation of men, as most would be off-site working during the daytime when many researchers may want to visit. The use of community involvement days at accessible facilities or trying to arrange set appointments for interviews are two possible ways. Repeat attempts to engage by arranging to return to the site during the evening may be useful. Early evening appointments may be just as inconvenient if the family has young children and a bedtime routine. Community members have stated appointments between late morning and early afternoon are likely to be most effective. However, this is likely to change on a case-by-case basis.

119. Local Authorities should also consider the right of children and young people to have their voices heard on decisions which affect them. This right is enshrined as article 12 in the United Nations Convention on the Rights of the Child (UNCRC). Children and young people may have significantly different opinions than their parents in relation to their aspirations. Researchers should aim to include young people in responding to their surveys, where possible. For example, Section D of the questionnaire asks about family growth and young people may have different views on their plans than their parents. By ultimately providing sites to meet the future need of Gypsy and Traveller households, Local Authorities will also be meeting the right of young people to good standard of living (article 27) and right to practice their culture (article 30).

120. Achieving interviews with as many community members as possible will improve the accuracy of data recorded. In other words, the more community members interviewed will make the data more representative of the whole Gypsy and Traveller population in the area.

Survey questions

121. The new universal questionnaire, modelled upon previous robust GTAA's, is attached to this guidance at **Annex 2**. The questionnaire is comprised of five parts to gather all of the relevant data required to assist Local Authorities to assess needs.

122. It is intended for interviewers to complete the questionnaire itself during a face-to-face conversation with a member of each household in the Local Authority area. This process should avoid the potential for literacy issues and ensure a higher rate of participation than a mailshot, as well as providing the opportunity for clarifications where words or questions have been misunderstood.

123. Section A asks community members their current accommodation arrangements. Analysis of this section will provide Local Authorities with the information required to understand the nature of the current accommodation supply. For example, although the analysis of existing secondary data should inform Local Authorities of how many authorised pitches are provided in the area, the answers to Section A should identify how satisfied community members are with their current circumstances. It may help Local Authorities to recognise where site refurbishment or household adaptations are required. Grants, such as the Sites Capital Grant and the Disabled Facilities Grant, may be able to help in this process. It may also be possible to identify if site management practices are deficient.

124. Section B seeks to establish the family structure of the household, including age, gender, ethnicity and any additional needs.

- 125.** The ethnicity column is not intended to capture any pre-set definitions of ‘Gypsy’ or ‘Irish Traveller’ etc. Instead, this column should be used for interviewees to be able to self-ascribe how they see their identity. The purpose of this is to alert the Local Authority to the various cultural or ethnic groupings which may exist within their Gypsy and Traveller population, as this may have some bearing on the eventual size and configuration of sites.
- 126.** The final column of the Section B table provides a broad opportunity for households to register anything which they believe Local Authorities need to know regarding why they cannot continue to occupy their current accommodation. This may include a cultural aversion to a particular type of accommodation or other issues they feel should be considered.
- 127.** Questions B2 and B3 should also help Local Authorities to understand whether there is likely to be overcrowding within the accommodation. More information on overcrowding on mobile home sites can be found in the Overcrowding section below.
- 128.** Question B4 provides an opportunity for community members to request an application pack to join the Local Authority waiting list for conventional housing or mobile home pitches.
- 129.** Section C enquires about accommodation aspirations and plans. Information gathered under this section will support Local Authorities to consider the viability of working with individuals to develop private sites and explores the accommodation aspirations of households who want to move.
- 130.** Questions C3, C4 and C6 should help Local Authorities to consider what type of accommodation is likely to be required to meet the needs of this household.
- 131.** Questions C2 and C7 (in addition to some questions in Section D) will help Local Authorities to assess whether mobile home pitch needs are likely to need to be met in the specific Local Authority where the household is currently residing or whether it could be provided in another Local Authority. If answers to these questions suggest the need could be met in other authorities the Local Authority undertaking the survey could discuss the potential for transferring the need with another Local Authority. However, the unmet need would remain with the authority where the household currently resides if the other authority refuses to accept the transfer of unmet need.
- 132.** Question C5 provides an opportunity for community members to register their intention to develop a private site in the area. The question allows community members to request a discussion with the Local Authority, which would provide an opportunity for the authority to assess the feasibility of plans to develop sites. If the community member does not provide their contact details it would be difficult for the Local Authority to assess the viability of private sites plans.
- 133.** Section D will help Local Authorities to plan for anticipated family growth and the needs which will arise from new households during the next 5 years. Questions D1 – D3 will help the Local Authority to understand future demand for residential accommodation arising from existing households.
- 134.** Questions D4 and D5 provide an opportunity for community members to notify the Local Authority regarding households living in other Local Authorities who want to reside in the same Local Authority as their family. If community members provide details of family members living elsewhere, the Local Authority should contact them to undertake another survey with the additional household. Under the Housing (Wales) Act 2014, Local Authorities have a duty to assess the needs of those who reside or resort to their area. Therefore,

questions D4 and D5 provide a route to assess the needs of those who resort to the area. However, this does not extend to a requirement for Local Authorities to assess the needs of the extended families of households residing in the area. The test of whether the Local Authority should assess needs is whether the household regularly spends time living on sites (authorised or unauthorised) in the Local Authority's area.

135. Where a desire for pitches arises from outside the Local Authority, the authority undertaking the GTAA may wish to discuss the circumstances and transfer of needs with the Local Authority where the household currently resides. The household should be asked to consent for these discussions to take place and the Local Authority should consider issuing a privacy notice.

136. Finally, Section E addresses the issue of the need for transit provision in the area and other Local Authority areas. Analysis of this section should help the Local Authority to understand whether there is a need for transit site accommodation in the area.

137. Sections A – D of the questionnaire are very closely related to residential pitch needs arising in the specific Local Authority undertaking the survey. However, Section E asks for information on a wider geographic basis. This is because transit sites needs are much more likely to be resolved on a regional basis to ensure sites are economically viable. Furthermore, the majority of households interviewed by the Local Authority are likely to be local residents so they are more likely to be travelling (and therefore more interested in transit sites) in other Local Authority areas.

138. It is crucial the answers to questions in Section E are shared with the Local Authorities named by community members to ensure transit site needs are properly accounted for in those areas. In particular the answers to questions E2, E3 and E5 are likely to be of use to other authorities. The data shared does not need to include any personal sensitive information as the answers to these questions should not be attributable to any household.

139. If Local Authorities, through the steering group, decide they wish to include other questions relating to accommodation needs they should include them as Section F of the questionnaire. When considering whether to include additional questions, Local Authorities should balance the desire for additional knowledge with the time it will take researchers to undertake the survey and the effective usefulness of the data collected. Longer interviews may increase the risk of participants, consciously or unconsciously, providing answers which they believe the interviewer wants to hear. To be most effective questionnaires should be developed in consultation with representatives of the local Gypsy and Traveller communities. They may include a mix of tick-box closed questions and more open questions where respondents are encouraged to expand their answers. Any additional questions should be included when submitting the GTAA to the Welsh Government.

Chapter Three: Assessing Accommodation Needs

140. Once the interviews and reviewing of data is complete, Local Authorities will need to make an assessment of the need to provide additional mobile home pitches.

141. From the results of the Gypsy and Traveller accommodation assessment (GTAA) it should be possible to identify the number of Gypsy and Traveller households which require additional pitches immediately, within 5 years, and over the Development Plan period.

This will include:

- the types of accommodation required to meet the need (i.e. residential or transit sites, specific sites for Travelling Showpeople or Romani Gypsies/Irish Travellers etc);
- the number of households already residing in the Local Authority in unsuitable accommodation (i.e. overcrowded, living in conventional housing with an aversion etc);
- the level of households on unauthorised developments or on authorised sites with temporary permission, which is likely to increase the unmet need if planning permission is not granted;
- the likely rate of net household formation (i.e. young adults needing their own pitches, migration and dissolution of households etc);
- the number of households with a realistic opportunity to move to preferred type of accommodation, which may free up spare pitches or bricks and mortar capacity.

142. This chapter will outline the process of using the data collected through the review of data sources and the specialist survey. It provides support in assessing needs and preferences, demand for accommodation in the specific area and in other areas, how to project net household formation, and how to make the essential final calculation of need for pitches.

143. Through undertaking the specialist survey Local Authorities may become aware of need or demand for residential pitches, transit pitches or bricks and mortar housing. Local Authority duties under Part 3 of the Housing (Wales) Act 2014 only relate to the requirement to provide mobile home pitches rather than other types of accommodation. Therefore, any need arising for bricks and mortar housing should be considered as part of the Local Housing Market Assessment and included in the local housing strategy in due course if the Local Authority prepares one.

Current residential pitch supply

144. Before Local Authorities can consider demand for additional pitches in their area it is important to explore the current residential pitch supply available. This process should be largely a matter of data collection based upon knowledge of authorised sites, held by Local Authority planning and housing departments. Rows A and B of **Table 3 – An estimate of need for residential site pitches** demonstrate how the number of occupied Local Authority pitches and authorised private pitches should be presented.

145. The number of occupied Local Authority pitches should be entered into row A. This data is available from the Caravan Count system and Local Authority housing records. Vacant pitches should not be included as these will be entered into row C in due course. The number of occupied authorised private pitches should be entered into row B. This data

will be available through completion of site surveys with occupants. Some private site owners may refuse interviewers access to the site, which may prevent the GTAA from identifying potential vacant pitches. If this occurs, the site should be taken to have full occupancy.

146. Local Authorities should not include households on 'tolerated' sites within current residential supply unless the site has been provided with assurances that no planning enforcement action will be taken against the site within the subsequent 5 year period.

147. Similarly, if authorised sites only have temporary planning permission and are due to close within the 5 year period the GTAA covers, the households on these sites will constitute demand under row F or G, rather than pitch supply.

148. Once the total number of occupied authorised pitches is identified, Local Authorities should consider planned additional pitch supply.

Planned residential pitch supply

149. Local Authorities should seek to identify the number of existing vacant pitches on authorised sites to be entered into row C. The number of vacant Local Authority pitches should be available from the Caravan Count system and Local Authority housing records. The data source used to identify the number of vacancies should align with the data source used to identify the number of occupied pitches in row A.

150. Understanding the level of vacancies on authorised private sites will require communication with the site owners. Some site owners may not wish to lease their vacant pitches to non-family members. Nevertheless, where this is the case the vacant pitches will ultimately be leased to family members, which would help to address the unmet need for pitches. The number of vacancies on private sites should also be entered into row C.

151. To identify the number of authorised pitches which are expected to become vacant in the near future, Local Authorities should review their site management records to assess the annual pitch turnover over a 5 year period. The average turnover rate of pitches for one year should be inserted into row D.

152. In addition, Local Authorities should review survey responses to questions A6-7 and Section C. Responses from these questions are likely to provide optimistic aspirations of households intending to move. Local Authorities can identify which responses are from households currently occupying authorised pitches by making reference to responses to question A1. This information can be explored by Local Authorities to ascertain whether any of these aspirations can be agreed.

153. When considering those who are likely to vacate pitches on authorised sites in the near future, survey responses may identify households who have expressed a desire to move into conventional housing. If Local Authorities wish to include the pitches currently occupied by these households as likely to become vacant in the near future, they must be able to demonstrate the household will definitely secure alternative accommodation. If this can be shown, these pitches can be included in row D.

154. Current levels of satisfaction with existing accommodation will provide some indication of whether households are likely to stay in their current accommodation. Individuals may express a preference to leave mobile home accommodation and move into conventional bricks and mortar housing or individuals may express a preference or cultural need to leave conventional housing in favour of mobile home accommodation.

155. When enquiring about current levels of satisfaction with existing accommodation (questions A2 and A7), it is possible improvements or adaptations to existing accommodation could be preferable to moving. Those expressing a desire to move accommodation may be helped to maintain their current accommodation through accessing the Disabled Facilities Grant or the Supporting People Grant.

156. The general amenity of the site and health and safety issues may be a reason for households wanting to move. If this is the case, Local Authorities may be eligible to utilise the Welsh Government's Gypsy and Traveller Sites Capital Grant to refurbish their sites.

157. In addition to the assessment of existing authorised pitches, Local Authorities should consider how many additional pitches with planning permission are due to become available. This will include Local Authority and private site pitches, where these will be available to rent. These additional pitches should be included as part of the planned residential pitch supply in row E.

158. Only sites with planning consent should be included at this stage. Sites currently in the planning system without planning consent must not be considered. This is because there is no guarantee the site will be deliverable until planning consent is granted and failed applications would under-estimate unmet need in the area. Nevertheless, if planning consent is approved for a site after the publication of the GTAA, the approved number of pitches will offset the identified unmet need.

159. The planned residential pitch supply can be calculated by adding the:

- a. number of currently vacant authorised pitches (row C);
- b. number of pitches expected to become vacant in the near future (row D);
- c. number of pitches with planning consent which are yet to be developed or occupied (row E).

160. The planned residential pitch supply should be entered into row P in Table 3.

Current residential demand

161. The current residential demand is found through making an estimate of the needs of Gypsies and Travellers consulted through the specialist survey and other relevant data sources. Researchers will have gathered information on household accommodation aspirations through the survey and Local Authorities will need to analyse this data to make an estimate of likely needs.

162. Before starting this process it is important to note an estimate of needs does not replace or contradict Local Authority duties under Homelessness or other Housing legislation. Estimates of need will not relate directly to specific households who are consulted and should simply represent an overall picture of likely needs which must be planned for. Once needs have been established, Local Authorities can utilise their existing Homelessness and Housing Allocation policies to make detailed assessments of who would be eligible for assistance and allocated pitches.

163. It is a fundamental this is communicated to Gypsy and Traveller participants to ensure they are not under the impression their aspirations will be met directly through this process.

164. Calculating the level of current residential demand will require Local Authorities to assess those:

- a. on unauthorised encampments with a likely need for site accommodation;
- b. on unauthorised developments without planning permission;
- c. on existing sites whilst in overcrowded conditions;
- d. in conventional housing with a cultural aversion or overcrowded; and,
- e. new households which are expected to arrive in the area.

165. Data collected through questionnaire sections A, C and D should support Local Authorities to consider the likely demand arising from these sources. However, Local Authorities will also have to make a distinction between accommodation needs and accommodation preferences / aspirations.

Understanding 'Needs' and 'Preferences'

166. Gypsies and Travellers have often not been able to access culturally appropriate sites in the areas where they wish to live. Different Local Authority approaches to providing sites and encampment enforcement have sometimes distorted where communities have settled. Where this is the case the Local Authority responsible for the area where the need is currently found may need to work closely with other Local Authorities in the region to find a shared solution. In some cases, Local Authorities who currently show a low level of need may need to accept they will have to play a greater part in meeting regional need.

167. The distribution of authorised Gypsy and Traveller sites is unevenly spread across Wales. Some of this distribution will be the result of the personal choices of community members who have opted to live in particular areas for family, economic or cultural reasons. However, it is also true some areas do not possess authorised sites because of more forceful enforcement policies and a refusal to provide sites where there is need. This is particularly likely to have occurred after the Criminal Justice and Public Order Act repealed the duty upon Local Authorities to provide sites in 1994.

168. As a result, sites in some areas may be populated by those with long-standing connections in neighbouring authorities. Similarly, some areas may have no sites whilst substantial Gypsy and Traveller populations live in conventional bricks and mortar housing in the area.

169. Consequently, Local Housing Authorities will likely encounter several situations when undertaking their surveys, where the needs and preferences of occupiers may be difficult to disentangle.

170. The consideration of needs versus preferences is likely to be focused around three major themes:

- a. community members in conventional housing who claim a need for mobile home pitches due to a cultural aversion;
- b. community members who claim a need for mobile home pitches in a different Local Authority area than the one undertaking the assessment; and
- c. Those on unauthorised sites who claim a need for mobile home pitches in the specific Local Authority undertaking the assessment.

Understanding the Cultural Aversion

171. For many Gypsies and Travellers, living in mobile homes is a key aspect of their cultural identity. However, the Census 2011 suggested only 24% of Gypsy and Traveller communities in England and Wales live in caravans or other temporary structures. The Census also suggested almost 76% of these communities currently live in houses, flats or bungalows in England and Wales.

172. Many of those living in houses, flats or bungalows do so by choice and for a variety of reasons. However, it is also believed a significant minority of this population have moved into conventional housing due to a lack of lawful mobile home pitch alternatives.²

173. Amongst the community members living in conventional housing, it is likely some experience what is known as a ‘cultural aversion’ to this type of accommodation.³ That is, community members who have a tradition of living in a mobile home or on sites and who struggle to adapt to living in conventional bricks and mortar accommodation.

174. Cultural aversion could be created by the failure to adapt to a new type of accommodation or more sedentary lifestyle or isolation from community and family members whilst living in conventional housing.

175. Local Housing Authorities will need to carefully consider whether those interviewed who have a stated preference for living on mobile home sites could also be said to have a cultural aversion to maintaining their accommodation in conventional housing. This consideration should have reference to:

- a. the cultural tradition of the household for living in mobile homes;
- b. the reason for moving into conventional housing;
- c. the likelihood of harm to the individual if they remain in conventional housing; and,
- d. the developing case-law around the issue of cultural aversion.

176. During the accommodation assessment, it would not be appropriate for Local Authorities to require interviewees to demonstrate their aversion through any kind of medical or psychiatric assessment. The assessment process aims to develop a broad estimate of likely overall Gypsy and Traveller pitch needs in the area, rather than the needs of any specific individuals.

177. Any in-depth assessments of an individual’s cultural aversion should be made as part of the Local Housing Authority’s homelessness or pitch allocation policies, rather than through the accommodation assessment.

178. Information contained within the survey questionnaire (especially questions A2, A3, A7 and Section B table) should support Local Authorities to ascertain whether individuals believe they have a cultural aversion to conventional housing. Local Authorities will need to make case-by-case estimates to ascertain which individuals would have a demonstrable aversion. This estimate will only serve to support the final accommodation needs identified in the assessment and can not be used as an alternative to proper investigation of individual circumstances through the homelessness or pitch allocation policy.

² Shelter, ‘Good Practice Guide: Working with housed Gypsies and Travellers’ (2008)

³ Established in case law, originally in *Clarke v. Secretary of State for the Environment, Transport and the Regions* (2002)

179. Estimates should have reference to the answers given in the questionnaire and the points outlined in paragraph 172 above. It is recognised these estimates are open to subjective interpretation. However, a pragmatic attempt to quantify the number of households living in conventional housing who require mobile home pitches needs to be undertaken.

180. Local Authorities should not require individuals who are currently resident in mobile home accommodation to demonstrate they have a cultural aversion to conventional housing for the purposes of the GTAA.

181. Where it is accepted individuals are likely to have a cultural aversion to conventional housing, Local Housing Authorities should include the need identified by these households as part of the current demand for mobile home pitches. This should be included in Row I of **Table 3 – An estimate of need for residential site pitches**.

182. Even when a cultural aversion is not agreed, it may be expedient for Local Housing Authorities to agree to move individuals in this scenario as it may benefit all parties. If the conventional housing currently occupied is socially provided the provision of an alternative mobile home pitch could free up social housing. This will be especially relevant in Local Authorities with a lack of socially provided conventional housing available.

Demand for accommodation in alternative local area

183. When undertaking surveys it is likely some community members will state they have a preference or a need to be accommodated on a mobile home site in another Local Authority area.

184. Questionnaire sections C and D should provide data to help Local Authorities to understand where such accommodation demand is likely to arise. Furthermore, section E is likely to provide useful data to ensure neighbouring authorities are able to anticipate future needs for transit accommodation.

185. Local Authorities should seek to engage proactively with other areas in anticipation of this likelihood. This will be easier to achieve where a regional partnership has already been established to undertake accommodation assessments or where the other Local Authorities are also undertaking their assessments simultaneously.

186. It is important the preferences of community members are given consideration and the relevant Local Authorities work together to decide where the demand for accommodation will arise. Where demand has been identified for accommodation in an alternative authority it must be recorded and details provided to the relevant authority.

187. This is likely to be a two-way process with demand being identified in both authorities, which may need to be communicated to the other. By working in partnership areas this process could be facilitated more easily. Nevertheless, understanding how such circumstances will be dealt with should be established in advance of undertaking the survey.

188. This process may result in the Local Authority undertaking the GTAA being informed by other Local Authorities regarding new households expected to arrive in the area. Answers to question D5 will also provide some information on this point. Finally, the Local Authority's pitch waiting list may also include information which will add to this figure. The number of households identified will populate row J of **Table 3 – An estimate of need for residential site pitches**.

Demand for accommodation from unauthorised sites

189. Where surveys of those occupying unauthorised encampments or developments show demand for mobile home pitches within the Local Authority where they are currently residing, Local Authorities will want to check the community members do not have alternative authorised accommodation elsewhere.

190. If these households do have alternative accommodation (pitches or housing) elsewhere their aspiration for pitches in the area would not constitute need.

191. Welsh Government planning circular 30/2007, “Planning for Gypsy and Traveller Caravan Sites”, makes clear applying local connection criteria to Gypsies and Travellers wishing to establish their own sites in an area would be inappropriate.

192. Demand arising from unauthorised encampments and unauthorised developments in the Local Authority area should be captured in rows F and G of **Table 3 – An estimate of need for residential site pitches** respectively. This includes sites which are currently ‘tolerated’ with no assurance of protection against planning enforcement or those on temporary sites with planning permission ending within 5 years.

193. The application of any local connection test should not be used in relation to aspirations for transit pitches in an area. By definition, potential occupiers of these sites are less likely to have a local connection and any such test would undermine the facilitation of the Gypsies and Travellers way of life.

Overcrowding

194. Residential demand is also likely to arise from overcrowding, either within existing sites or conventional housing. Due to the legacy of a lack of site provision, many of those provided throughout Wales experience overcrowding on the pitch. This situation can have serious health and safety implications, notably the risk of fires if additional caravans are placed on the pitch.

195. There is no legal definition of overcrowding in the context of a mobile home. However, the Bedroom Standard, which is used within a conventional housing context can be adapted for use in these circumstances.

196. The Bedroom Standard is defined in this guidance as requiring a separate sleeping area for each:

- a. adult couple (married or cohabiting);
- b. any other adult aged 16 or over;
- c. pair of children aged under 16 of the same sex;
- d. pair of children aged under 10 regardless of sex;
- e. any other child.

197. Within mobile homes, the Bedroom Standard should also apply. However, it should more accurately relate to separate sleeping areas, rather than bedrooms. Unlike in conventional housing, it may be possible to relieve any identified overcrowding through the addition of another mobile home on the pitch.

198. Local Authorities may need to consider if it is possible for the household to station another mobile home on the pitch without contravening the Fire Safety guidance included in the Welsh Government's *Designing Gypsy and Traveller Sites* guidance. It is recommended Local Authorities consult the local Fire and Rescue Authority if they are unsure regarding the possibility for safely stationing additional mobile homes on the site. If households are unable to safely station an additional mobile home and their current accommodation contravenes the Bedroom Standard, this will indicate additional residential demand.

199. Overcrowding in conventional housing should be more straightforward to assess and Local Housing Authorities will be used to undertaking such assessments through their existing housing functions. However, where overcrowding is present in housing and arises from new household formation, Local Authorities will need to be aware it may constitute additional residential pitch demand. If the overcrowding is the result of dependent children reaching adulthood, these new households may express a desire to live in mobile home accommodation. As these individuals could not be said to have made the original decision to live in conventional housing, Local Authorities should consider this to represent additional demand which should be met.

200. Questionnaire section B will provide Local Authorities with useful information regarding participants' perceptions of overcrowding.

Calculating overall residential need

201. The current residential demand can be found by adding the demand found through those on unauthorised encampments (row F), unauthorised developments (row G), through overcrowding (row H), through those with a cultural aversion to their current accommodation (row I) and through households expected to arrive from elsewhere (row J).

202. The current residential demand total should populate row M in Table 3.

Future residential demand

203. Anticipated future household growth should be identifiable by the answers provided by participants under section D of the questionnaire. This will provide an estimate of additional households over the coming 5 year period. As a guide, it is likely household growth in Gypsy and Traveller communities is greater than in the wider settled community. However, data compiled by those undertaking previous Gypsy and Traveller accommodation assessments suggests this growth rate is usually within the range of 1.5 – 3% per annum.⁴

204. Local Authorities should analyse the demographic data provided by community members to consider their own local anticipated growth over the 5 year period. However, reference to the range above should ensure needs are not excessively under- or over- estimated.

205. This anticipated growth is the estimated number of households representing future residential demand and should be used to calculate row K of Table 3 – An estimate of need for residential site pitches.

206. The first column of row K reflects the number of households currently occupying authorised pitches in the area plus the current residential demand, minus the expected vacancies on authorised pitches found in row D.

⁴ Opinion Research Services, 'Household formation rates for Gypsies and Travellers: Technical note' (2013); Pat Niner / ODP, 'Local Authority Gypsy/Traveller Sites in Wales' (2003)

207. In the example calculation in Table 3, household growth has been estimated using the mid-range growth figure provided by previous estimates and multiplied by the total number of households in the area, which is found in the first column of row K. The use of the mid-range growth figure is for illustrative purposes and Local Authorities should utilise their own local growth rate.

208. Inevitably, there should also be dissolution of some households over time. The calculation found through Table 3 – An estimate of need for residential site pitches should take account of this dissolution through Local Authorities considering their pitch turnover rate in row D. Where households on pitches have been dissolved the pitch would have been reallocated as part of this turnover.

209. As the estimate of household growth is based upon the aspirations of community members, it would be difficult to perfectly forecast growth in excess of 5 years. However, the GTAA is a crucial piece of evidence underpinning Local Development Plans (LDPs), which operate on a longer timeframe. To address this point, GTAAs should apply the same estimated growth rate over the full LDP period to produce an additional figure of need arising in the Local Authority area.

210. Although this process will identify an indicative pitch need over the lifetime of the LDP, this longer-term figure is expected to be revised every time the GTAA is redone. This will ensure the forecasting of growth can be as accurate as possible and should limit the extent of changes needed to the LDP each time a GTAA is published.

211. The additional household pitch need (row L) can be found by subtracting the current number of households in the first column of row K from the estimated future number of households in the second and third columns of the row. These values will populate rows N and O of Table 3.

212. The overall residential or unmet need for additional residential pitches can be found by adding the current residential demand and the estimated future additional pitch need, then subtracting the planned residential supply. The balance of these figures will provide the unmet need for the 5 year period (row Q) and over the plan period (row R), as indicated in at the bottom of the example overleaf. The level of 5 year unmet need must be provided within the area as soon as possible. The longer term need should be provided during the lifetime of the LDP.

Table 3 – An estimate of need for residential site pitches

Current residential supply	Number of pitches
A. Occupied Local Authority pitches	40
B. Occupied authorised private pitches	40
Total	80

Planned residential supply	Number of pitches
C. Vacant Local Authority pitches and available vacant private pitches	1
D. Pitches expected to become vacant in near future (see note 1)	12
E. New Local Authority and private pitches with planning permission	12
Total	25

Current residential demand	Pitch demand
F. unauthorised encampments	5
G. unauthorised development	10
H. overcrowded pitches (see note 2)	15
I. Conventional housing (see note 3)	15
J. New households to arrive (see note 4)	5
Total	50

Current households (see note 7)	Future households (at year 5)	Future households (Plan period)
K. 118	132 (see note 5)	165 (see note 6)
L. Additional household pitch need	12	42

Unmet Need	Need arising	Need accommodated
M. Current residential demand	50	
N. Future residential demand (5 year)	12	
O. Future residential demand (plan period)	42	
P. Planned residential supply		25
Q. Unmet need (5 year)		39 pitches
R. Unmet need (Plan period)		72 pitches

Notes

1. As identified through analysis of pitch turnover data.
2. Overcrowding – e.g. where family numbers have grown to the extent that there is now insufficient space for the family within its mobile home accommodation and insufficient space on the pitch or site for a further mobile home.
3. As identified in the survey. This includes those with a cultural aversion to conventional housing, those experiencing overcrowding, and those whom have reached adulthood and want to live on a site.
4. As identified in the survey through waiting list, Caravan Count or partnership working with Local Authorities in the region.
5. 118 households (current residential supply + current residential demand – pitches expecting to become vacant) @ 2.25% year on year for 5 years. Growth rate for illustration only. Local growth rate should be based on details identified in the local survey.
6. 118 households (current residential supply + current residential demand – pitches expecting to become vacant) @2.25% year on year for 15 years. Growth rate and 15 year plan period for illustration only. Local growth rate should be based on details identified in local survey. Plan period should align to current LDP.
7. Occupied authorised pitches plus the current residential demand, minus the expected vacancies from authorised pitches.

Calculating transit need

209. Once the assessment of accommodation need has been carried out for Gypsies and Travellers on unauthorised sites, it will be possible to identify whether their presence on those sites indicates a need for residential pitches within the area, a need for transit pitches, or no requirement as the encampment was the result of a one-off family occasion or medical emergency. Some encampments also occur without a desire for permanent or long transit stays in the area. These occupants are likely to be simply “passing through.” Local Authorities will need to consider whether it would be more appropriate to provide temporary stopping places where such encampments are rare or a more sustainable transit site for more frequent stays. More information regarding responding to instances of unauthorised camping can be found within the Welsh Government’s *Managing Unauthorised Camping* guidance.⁵

210. Temporary stopping places are short-term unsustainable facilities which can be utilised to re-locate an encampment which occurs in an inappropriate location. These temporary stopping places should be pro-actively identified by Local Authorities to ensure encampments can be swiftly moved when required. However, if a Local Authority is experiencing a significant number of unauthorised encampments, providing transit sites should be considered.

211. Unlike temporary stopping places, transit sites are permanent facilities which allow occupation by households for up to 3 months at a time. These sites can be provided with the assistance of Welsh Government Gypsy and Traveller Sites Capital Grant funding and Local Authorities would be able to charge residents a weekly rent and service charges.

212. A need for transit sites would be identified through a significant number of encampments occurring in the area, particularly between March and October, especially if they last more than a few days.

213. Though there is a public perception Gypsies and Travellers should follow a nomadic habit of life, the Welsh Government realises the traditional semi-nomadic lifestyle is now very difficult to achieve. Romani Gypsies and Irish Travellers are officially recognised ethnic minorities and the traditional lifestyle of travelling or nomadism is not required to maintain their racial identity. Nevertheless, many Gypsies and Travellers attempt to continue at least a semi-nomadic lifestyle, usually travelling for a period between the end of March and beginning of October each year.

214. Some of those occupying unauthorised encampments may have permanent bases elsewhere and hence will not be considered in need of residential pitches in the survey area. However, this should not apply in relation to the demand for transit pitches.

215. The case of *Chapman v UK* (European Court of Human Rights, 2001) established the UK has a duty to facilitate the Gypsy way of life. The Welsh Government acknowledges this includes a desire for a semi-nomadic lifestyle whilst there is also a lack of available stopping places for these communities. Under the Housing (Wales) Act 2014, Local Authorities will have a duty to provide for identified transit pitch needs, as well as residential pitch needs.

216. Accurately understanding the likelihood of needing to provide transit sites is likely to require an even greater level of cooperation with other Local Authorities. Section E

⁵ *Managing Unauthorised Camping* (2013), Welsh Government: <http://gov.wales/topics/people-and-communities/communities/communitycohesion/gypsytravellers/accommodation-needs/?lang=en>

of the questionnaire seeks to capture the transit requirements of Gypsies and Travellers throughout Wales, which should go some way towards providing an evidence base of likely needs in other Local Authorities. This data will need to be shared within the partnership area and with other Local Authorities where need is anticipated.

217. The Welsh Government will encourage Local Authorities to work in partnership to develop a network of transit sites in the most appropriate locations around Wales. The All-Wales Gypsy and Traveller Accommodation Forum offers an ideal platform for discussions on this issue.

218. Caravan Count data should also provide very useful information of the likely transit needs within the Local Authority area. This is because the 'log of unauthorised sites' component of the Caravan Count system will record the locations of encampments when Local Authorities respond to them. Reviewing this data should provide Local Authorities with the number of encampments throughout the year, the most occupied locations, the number of caravans present on each encampment and the duration and reason of the stay. This information can be analysed to understand whether there is need for a transit site and its required size.

219. When calculating the unmet need for residential pitches, Local Authorities may wish to consider the proportion of need arising from each community as it may have a bearing on the future configuration of sites which need to be provided. For example, due to the specific design and management requirements of Travelling Showpeople and New Traveller sites they are likely to use sites which are unique to those communities.

Chapter Four: Submitting Reports to Welsh Ministers

220. Section 102 of the Housing (Wales) Act 2014 requires Local Authorities to submit their Gypsy and Traveller accommodation assessment reports to the Welsh Ministers for approval.

221. The report must clearly set out how the assessment was carried out and a summary of consultations undertaken in connection with the assessment, including responses received. As part of this, Local Authorities are encouraged to provide a breakdown of accommodation needs in a similar way to the table entitled **Table 3 – An estimate of need for residential site pitches**. The report must also provide details of the pitch needs identified.

222. It is strongly recommended Local Authorities submit their full Gypsy and Traveller accommodation assessment report, which should contain this information, to ensure Welsh Ministers have all the relevant information they require to approve the report as early as possible.

223. Welsh Ministers will assess the submitted report to ensure its robustness in terms of compliance with this guidance, quality of engagement with relevant individuals and calculation of needs.

224. Welsh Ministers may approve the assessment as submitted, approve the assessment with modifications, or reject the assessment and require a new assessment be undertaken. If reports are not approved as submitted, the Welsh Government will consult with the particular Local Authority in relation to the necessary changes required.

225. Once an assessment has been approved by Welsh Ministers, it must be published by the Local Authority. It is recommended Local Authorities publish the accommodation assessment on its website and provides feedback to the participants in the survey to ensure they understand how their views have been included and what the next steps will be.

226. At any time, Local Authorities must provide Welsh Ministers with any information they require in connection with assessing these reports.

227. This guidance aims to provide Local Authorities with advice on the process of carrying out an assessment of the accommodation needs of Gypsies and Travellers. However, it is recognised the exact approach may need to be reasonably adapted to suit local circumstances.

228. A draft Gypsy and Traveller accommodation assessment submission template at **Annex 4** is provided to assist Local Authorities to understand the information the Welsh Government expects to require to assess compliance with the guidance.

229. The Welsh Government does not want to receive personally identifiable data relating to Gypsy and Traveller residents when Local Authorities submit their GTAAs for scrutiny.

Chapter Five: Making use of the assessment

230. Once the Gypsy and Traveller accommodation assessment has been approved by Welsh Ministers, Local Authorities will be subject to a legal duty to exercise their functions to provide mobile home pitches to meet the identified needs. Section 56 of the Mobile Homes (Wales) Act 2013 provides the power for Local Authorities to do this. However, Local Authorities should recognise there are a range of tools at their disposal to support them to achieve this aim.

231. Local Authorities should consider how far each of the following options can assist them in providing for the unmet need:

- a. providing Local Authority Gypsy and Traveller sites;
- b. supporting households to develop viable private sites;
- c. supporting households to develop viable community led approaches such as Community Land Trusts.

232. Option A will offer Local Authorities with opportunities to control the allocation of pitches on these sites, in accordance with the Mobile Homes (Wales) Act 2013 and their housing allocation policies. This would mean future pitch vacancies could be filled to militate against overcrowding or homelessness within the area. In addition, in some circumstances vacancies on such sites could be used to efficiently relocate unauthorised campers, which could provide added social benefits.

233. If Local Authorities decide to pursue Option A to meet some, or all, of their unmet needs they should be eligible to apply for the Welsh Government's Sites Capital Grant. The Sites Capital Grant currently provides at least £1.5 million per annum for site refurbishment and development purposes.

234. The Welsh Government *Designing Gypsy and Traveller Sites* guidance should be given due consideration when Local Authorities are seeking to develop sites. The Local Authority should also consider the Welsh Government's *Planning for Gypsy and Traveller Sites* planning circular and, when developing sites for Travelling Showpeople, the joint Welsh Office and Department for the Environment circular 78/91. These documents are available on the Welsh Government website.

235. To make use of the Sites Capital Grant, Local Authorities must retain the ownership or leasehold of the site to be developed. Potential sites must also have the necessary planning permission in place before applications for Sites Capital Grant funding are submitted.

236. It is also possible for the Local Authority to develop Gypsy and Traveller sites and then to arrange for another organisation to be contracted as managers of the site. In the past this has produced mixed results in Wales and may be more appropriate for certain communities. For example, Travelling Showpeople may support site management by the Showmen's Guild.

237. Option B would involve the Local Authority working proactively with Gypsy or Traveller households who have a viable opportunity to develop private sites in the area. Responses to questionnaire section C will provide Local Authorities with information regarding aspirations for private sites. Local Planning Authorities should seek to discuss proposals with Gypsies and Travellers at the earliest possible opportunity to ensure only viable site applications are progressed. Planning Aid Wales may be able to assist with some community engagement in relation to site proposals.

238. An assessment of viability will depend on a range of factors, which prevents this guidance including a set methodology. The affordability of sites depends upon the circumstances of the particular family wishing to establish a private site and the relevant local planning policies. Local Authorities with appropriate rural exception policies allowing Gypsy and Traveller sites may increase the likelihood of viable sites, as land is expected to be cheaper in more rural locations. Local Authorities should discuss the viability of sites on a case-by-case basis.

239. Pursuing option B would not discharge the Local Authority's duty to provide sites until the pitches are eventually available for occupation. Nevertheless, by supporting households to develop sites there should be negligible costs to the Local Authority or Welsh Government. Furthermore, the sites created through this process would be small-scale and occupiers would be more easily able to integrate into the local community.

240. Option C would involve the Local Authority working proactively with Gypsy or Traveller households to develop a more community led approach such as Community Land Trusts (CLTs).

241. A CLT is a mechanism for acquiring and holding land and property for the benefit of a defined locality or community. The purpose of CLTs is commonly to provide affordable housing. However, CLTs may also exist for other purposes, such as community/social enterprise or cultural, recreational, environmental or conservation objectives.

242. A CLT can operate to capture the value of the land for the community in perpetuity while facilitating productive use of the land separate from its ownership. CLTs must be not-for-profit organisations in which the community owns the land and/or property or assets in trust.

243. A site could be owned by the Trust itself, rather than the occupants, and would be maintained for the use of these communities rather than becoming private sites over the long-term.

244. Local Authorities could constitute part of the membership of the CLT, along with members of the Gypsy or Traveller community and other relevant individuals or organisations.

245. Such schemes may be more attractive than living on Local Authority sites to certain communities, for example, New Travellers. The cultural desire for ecological and cooperative living amongst this community lends itself to this type of development. When assessing whether to pursue options such as private sites or CLTs, Local Authorities should review participant answers under section C of the questionnaire. Some communities may not be prepared to live on Local Authority owned or managed sites.

246. Plans to develop Gypsy and Traveller site CLTs have been proposed in recent years. However, the major obstacle has been securing land to develop. If this barrier can be overcome, this type of site might become a viable alternative to Local Authority or privately provided sites.

247. It is crucial the Local Authority considers the future occupants of the site which it proposes to develop as each community has specific cultural concerns which will need to be taken into account for any design or management proposal. More information can be found in the Welsh Government's *Designing Gypsy and Traveller Sites* guidance.

248. The data collected through the accommodation assessment process will inform the preparation of Development Plans. One of the tests of the soundness of a draft Development Plan at its examination will be whether it is founded on robust and credible evidence. Following this guidance closely should support Local Authorities to demonstrate they have conducted a robust assessment. Local Authorities will also need to demonstrate the unmet need identified will be met through the planning system.

249. Where Development Plans are yet to be adopted, the needs identified in the Gypsy and Traveller accommodation assessment should be included. This should take the form of site specific proposals to meet the identified need in the plan period of the assessment and criteria-based policies to make provision for any additional need arising throughout the Development Plan period.

250. Where Development Plans have already been adopted, Local Authorities will need to review and consider revising their policies in relation to Gypsy and Traveller accommodation needs at the next Development Plan Annual Monitoring Review (AMR). Revising the plan will require the identification of potential sites for the development of pitches which will address the unmet need. The revised plan should include enough pitches to meet the full unmet need. The Development Plan may require revision to ensure the relevant site provision is made.

251. Local Authorities will be aware the process of identifying sites and achieving planning permission can be a lengthy one. These processes will be subject to public consultation and decisions may be contested by concerned residents or businesses. Therefore, Local Authorities should ensure their evidence base is robust and work to identify sites to meet the unmet need as soon as possible.

252. The data has other uses apart from decision-making regarding new provision, and will also inform the Local Authority's potential work in other ways. It will provide a clearer understanding of the ways in which bricks and mortar housing can be made to work better for the Gypsies and Travellers who live there. It will help to show what support may be needed by Gypsies and Travellers to access and maintain stable accommodation, and how access to services can be improved. Any needs for additional bricks and mortar housing should be included in the Local Housing Market Assessment.

Chapter Six: Review and Update

253. The Housing (Wales) Act 2014 requires Local Authorities to undertake a Gypsy and Traveller accommodation assessment (GTAA) at least every 5 years. This is because it is difficult to accurately assess Gypsy and Traveller population changes over a period longer than 5 years.

254. Once unmet pitch needs have been established through the assessment process and approved by the Welsh Ministers, Local Authorities should work to meet the need through the Development Plan process.

255. Progress toward meeting the identified needs will need to be assessed at regular intervals to ensure the Local Authority is able to utilise its planning powers, including its enforcement functions effectively. It is incumbent on Local Authorities to demonstrate they are doing all it reasonably can to meet needs. Planning inspectors may assess Local Authority progress against meeting these needs when making decisions regarding planning enforcement issues.

256. Furthermore, Welsh Ministers possess the power under section 104 of the Housing (Wales) Act 2014 to direct Local Authorities to utilise their functions to provide the necessary sites.⁶ This power can be invoked if Welsh Ministers are satisfied Local Authorities are not complying with their duties to provide the required Gypsy and Traveller sites.

257. Local Authorities have the flexibility to undertake GTAAs at 5 year intervals or any time in between. They may choose to do more frequent assessments if a material change in the level of need in the area has been identified. Local Authorities may choose to align the renewal of their GTAAs with the substantial review of the Local Development Plan every 4 years.

258. The Welsh Government will continue to monitor site provision and progress towards meeting identified need in each Local Authority.

259. The Welsh Government will review this guidance during 2018 to reflect any relevant legislative changes, such as those proposed by the Planning (Wales) Bill, if they receive Royal Assent. Changes which occur as a result of the Williams Commission recommendations will also be considered. The first cycle of GTAAs produced under this guidance will also be reviewed to consider if any changes are required before the second cycle.

⁶ To be commenced, expected March 2016

Annex 1: Relevant Organisations

Wales-based organisations:

Gypsies & Travellers Wales

113-116 Bute Street

Cardiff Bay

Cardiff

CF10 5EQ

029 2021 4411

info@gtwales.org.uk

Travelling Ahead (at Save the Children Cymru)

8 Cathedral Road,

Cardiff

CF11 9LJ

029 2039 6838

travellingahead@savethechildren.org.uk

<http://www.travellingahead.org.uk>

The Unity Project

Monkton CP School

Pembroke

Pembrokeshire

SA71 4LS

unity@pembrokeshire.gov.uk

Romani Cultural and Arts Company

Temple Court

13a Cathedral Road

Cardiff

CF11 9HA

isaacblake@romaniarts.co.uk

<http://www.romaniarts.co.uk>

The Bridges Project

Merthyr Tydfil

01685 353959

lb2@smt.org.uk

The Showmen's Guild of Great Britain (Travelling Showpeople only)

South Wales –

110 New Dock Road

Llanelli

SA15 2HH

07949 289 075

Sgwales@talktalk.co.uk

North Wales –

11 St. Mary's Place

Bury

Lancashire

BL9 0DZ

01617 629 502

leesashowmensguild@yahoo.com

<http://www.showmensguild.co.uk>

The Travellers School Charity (New Travellers only)

Ty Loveden House

26 Bridge Street

Aberystwyth

Ceredigion

SY23 1QB

07786 466 107

info@travellersschool.org.uk

<http://www.travellersschool.org.uk>

Planning Aid Wales

First Floor

174 Whitchurch Road

Cardiff

CF14 3NB

029 2062 5000

<http://www.planningaidwales.org.uk>

Other UK community support organisations:

The Traveller Movement (formerly Irish Travellers Movement in Britain)

The Resource Centre

356 Holloway Road

London

N7 6PA

020 7607 2002

info@travellermovement.org.uk

<http://www.travellermovement.org.uk>

Friends, Families and Travellers

Community Base
113 Queens Road
Brighton
BN1 3XG

01273 234777

Fft@gypsy-traveller.org

www.gypsy-traveller.org

The National Federation of Gypsy Liaison Groups

c/o Derbyshire Gypsy Liaison Group

Unit 3

Molyneux Business Park

Whitworth Road

Darley Dale

Matlock

DE4 2HJ

01629 732744

info@nationalgypsytravellerfederation.org

<http://www.nationalgypsytravellerfederation.org>

The Gypsy Council (for Education, Culture, Welfare and Civil Rights)

8 Hall Road

Aveley

Romford

Essex

RM15 4HD

07963 565 952

info@gypsy-association.com

<http://www.gypsy-association.com>

Roma Support Group

PO Box 23610

London

E7 0XB

020 7511 0800

info@romasupportgroup.org.uk

<http://www.romasupportgroup.org.uk>

Annex 2: Questionnaire

Section A – Your Home

A1 Where do you live now?

Local Authority (“Council”) residential site	
Council transit site	
Private site with planning permission	
Private site currently without planning permission	
Unauthorised encampment	
Bricks and Mortar – Socially Rented	
Bricks and Mortar – Privately Rented	
Bricks and Mortar – Owner Occupied	

A2 Are you satisfied with your current accommodation?

Yes	
No	
Prefer not to say	

If ‘no’ please explain what could be improved:

A3 Can you tell me why you live here?

Local connections (family or work)	
No alternative authorised pitch	
Can't find a house to move into	
Health or age reasons	
Prefer houses to caravans	
Other:	

A4 How long have you lived here?

Less than 1 month	1–6 months	7–12 months	1–2 years	2–5 years	Over 5 years

A5 If you have moved within the last year, was your last home in this Local Authority?

YES NO

Please give details below:

Type of accommodation	Did it have planning permission?	Which Local Authority was it in?	Why did you leave?

A6 How long do you think you'll stay here?

1 or 2 days	3–28 days	1–3 months	3 months – 2 years	2–5 years	Over 5 years	Do not intend to move	Don't know

A7 Would you stay longer if changes or improvements were made to your current accommodation?

(Note: The Local Authority may not be able to make these improvements but understanding the problems with your accommodation may help)

YES

NO

Reason	Tick
Repairs needed	
Site made bigger	
Accommodation made safer	
Planning permission granted	
Adaptations needed (please state below)	

Reason	Tick
Just passing through	
Want authorised pitch in other area	
Want to move into housing	
Relationships broken down	
Prefer living in caravan	

Other:

Section B – Your Family

	Relationship to respondent (eg. Spouse, son/ daughter etc)	Age	Gender	Romani / Irish Traveller / New Traveller / Showperson / Roma / Other (Self-ascribed)	Are there any reasons why you cannot continue to live in this accommodation? (Give details)
Respondent					
Person 2					
Person 3					
Person 4					
Person 5					
Person 6					
Person 7					
Person 8					
Person 9					
Person 10					
Person 11					
Person 12					

If not living in caravans proceed to B4.

B2 If living in caravans, are there enough sleeping areas for all residents?

YES NO

B3 Is there room on the pitch for additional trailers to prevent overcrowding?

(Note: guidance suggests that there should be 6 metre gap between trailers and 3 metre gap to boundaries to be safely accommodated on pitch)

YES NO

If yes, how many additional sleeping areas can be added?

B4 Would anyone in your family like to join the Local Authority waiting list for pitches or housing?

YES NO

Please provide address for application pack to be posted to below:

Please state if already on a waiting list and which.

Section C – Your Plans

C1 Are you planning to move into other accommodation?

Yes	<i>Go to C2</i>	
No	<i>Go to D1</i>	
Prefer not to say	<i>Go to D1</i>	

C2 Where are you planning to move to?

Within the Local Authority	
Another Local Authority in Wales – please state which	
Somewhere else in the UK	

C3 Why are you planning to move?

Need more space	
Need different facilities	
Local connection (family or work)	
Need to be closer to services – schools etc (Please give details below)	
Employment opportunities	
Other (Please specify below)	

Services:	Other:
-----------	--------

C4 What type of accommodation are you planning to move to?

1. Site		2. Bricks and Mortar	
Council / Social rented		Owner / occupied	
Private site owned by self		Rent from Council / Housing Association	
Private site owned by other		Rent from private landlord	

C5 Do you own land in the Local Authority which you would like to be considered as a possible future site?

(**Note:** Interviewer to explain that there is no guarantee that the site will be allocated or developed but planning officers may contact respondent to discuss their situation and offer support)

Yes	<i>Give details below</i>	
No	<i>Go to C6</i>	
Prefer not to say	<i>Go to C6</i>	

If you like the Local Authority to discuss these plans with you, provide contact details below:

		YES	NO
C6	If you are looking for an authorised pitch, would you live on a site managed by the Local Authority if offered one?		
C7	If an authorised pitch was available in another Local Authority, would you consider moving there? If ' yes', which Local Authorities?		

Section D – Family Growth

D1 Is anyone in your household likely to want to move to their own home in the next 5 years?

Yes	<i>Go to D2</i>	
No	<i>Go to D4</i>	
Don't know	<i>Go to D4</i>	
Prefer not to say	<i>Go to D4</i>	

D2 Will this be in this Local Authority?

Yes	<i>Go to D3</i>	
No	<i>Go to D4</i>	
Prefer not to say	<i>Go to D4</i>	

D3 How many new households will there be and when will these be needed?

	Type of accommodation (LA site; private site; B&M housing)	No. of people	Now	Within a year	1-2 years	2-5 years
Household 1						
Household 2						
Household 3						
Household 4						

D4 Do you have family members living outside this area who camp in this Local Authority regularly?

Yes	<i>Go to D5</i>	
No	<i>Go to E1</i>	
Don't know	<i>Go to E1</i>	
Prefer not to say	<i>Go to E1</i>	

D5 If they would like to be interviewed about the need for pitches, provide their contact details and Local Authority where they currently live below:

Section E – Transit Sites

E1 Have you camped by the roadside / on an unauthorised encampment / on a transit site in Wales while travelling in the past year?

(Prompt: this information is only to be used to understand if more transit sites are needed)

Yes	<i>Go to E2</i>	
No	<i>Go to E4</i>	
Prefer not to say	<i>Go to E4</i>	

E2 In which Local Authority areas have you camped?

Prefer not to say

E3 How long would you usually stay in one place whilst travelling?

1–2 days	3 days – 1 week	1–2 weeks	2 weeks – 1 month	1–3 months

E4 Do you think there is a need for more transit sites in Wales?

Yes	<i>Go to E5</i>	
No	<i>Questionnaire ends</i>	
Prefer not to say	<i>Questionnaire ends</i>	

E5 Where are they needed? (Probe for Local Authorities and specific locations)

Prefer not to say

Annex 3 – Interview Log

Please [click here](#) to go to Interview Log.

Annex 4: Draft Gypsy and Traveller Accommodation Assessment submission template

Local Authorities are able to structure their Gypsy and Traveller Accommodation Assessments in which ever way they choose. However, following the template below should ensure the scrutiny process of the GTAA by Welsh Ministers is concluded quicker. The template includes only suggested headings and expected information to ensure that crucial information is included and easily referenced during the scrutiny process.

Chapter One: Policy context

- **Legislation and Guidance**
 - Housing (Wales) Act 2014 duties.
 - Mobile Homes (Wales) Act 2013 powers.
 - Planning circulars 30/2007 and 78/91.
 - Welsh Government Designing Gypsy and Traveller Sites guidance.
- **Local Development Plan policies**
 - Site specific allocations.
 - Criteria-based policies.
 - Rural exception policies.
- **Definition of key terms**
 - Recommended to use common definitions to those included in the Welsh Government's *Undertaking Gypsy and Traveller Accommodation Assessments* guidance.

Chapter Two: Background and analysis of existing data

- **Previous Gypsy and Traveller Accommodation Assessment findings**
 - Identified need to be met and progress to date.
- **Population data**
 - Analyse data from Census 2011, Local Authority Housing and Planning records, Traveller Education Services and Health Board information, and knowledge from specialist officers or voluntary organisations.
- **Caravan Count**
 - Data can show trends in overcrowding on authorised sites or change in unauthorised encampment patterns over time.
- **Current accommodation provision**
 - Local Authority sites – residential and transit. Make clear if sites are only temporary in nature.
 - Privately owned authorised sites (permanent).
 - Privately owned sites with temporary permission.
 - Unauthorised developments.

- Unauthorised encampments.
- Include information about any ethnically or culturally specific site. For example, if a site is exclusively for Showpeople or New Travellers, please state.

Chapter Three: Methodology

- **Project steering group composition**
 - Please state who comprised the steering group membership, including the organisation, ward or community they represent.
- **Study Methodology**
 - Who undertook the study?
 - Approach taken, including where the study deviated from the guidance.
 - Dates of undertaking survey.
 - Engagement with other Local Authorities.
 - List of consulted organisations.
 - Confirm compliance with engagement checklist.
 - Any alterations to the universal questionnaire.

Chapter Four: Survey Findings

- **Households interviews**
 - Number of households broken down by type of accommodation and by ethnicity.
 - Include interview log.
 - Explain any difficulties encountered trying to access households.
- **Demographic profile of population**
- **Suitability of current accommodation**
 - Satisfaction findings discussion.
 - Overcrowding.
 - Improvements / changes required.
- **Accommodation aspirations**
 - Discussion of needs and preferences of those who desire authorised pitches, including reasons for any discounted aspirations.
 - Discussion regarding realistic potential for private site developments.
- **Household growth**
 - Number of expected new households within 5 years.
 - Number of expected new households within LDP period.
 - Include information about any assumptions made regarding anticipated level of growth.

Chapter Five: Assessing accommodation needs

- **Residential unmet need**
 - Current Residential supply.
 - Planned Residential supply.
 - Current Residential demand.
 - Future Residential demand.
 - Future Household Growth.
 - Table of needs (similar to Table 3 in the Undertaking GTAA's guidance).
- **Transit unmet need**
 - Include analysis of Caravan Count data and other relevant data to determine need for transit sites, temporary stopping places or neither.
 - Include discussions with neighbouring Local Authorities.

Chapter Six: Conclusions and Recommendations

- **Next steps**
 - Proposed plan to understand what type of additional sites are required and their locations. Full plans and locations not required as these take more time to develop.
 - Proposed timescale for updating of LDP policies.

Appendix 1: Survey Questionnaires (only any questions that differ from the universal questionnaire)



Future Generations Evaluation (includes Equalities and Sustainability Impact Assessments)

<p>Name of the Officer completing the evaluation Stephen Griffiths</p> <p>Phone no: 01633 644455 E-mail: stephengriffiths@monmouthshire.gov.uk</p>	<p>Please give a brief description of the aims of the proposal</p> <p>Gypsy and Traveller Needs Assessment.</p> <p>To determine the level of need within Monmouthshire for Gypsy and Traveller pitch provision.</p>
<p>Name of Service</p> <p>Housing & Community Services</p>	<p>Date Future Generations Evaluation form completed</p> <p>22nd December 2015</p>





Page 107


Does your proposal deliver any of the well-being goals below? Please explain the impact (positive and negative) you expect, together with suggestions of how to mitigate negative impacts or better contribute to the goal.

Well Being Goal	How does the proposal contribute to this goal? (positive and negative)	What actions have been/will be taken to mitigate any negative impacts or better contribute to positive impacts?
<p>A prosperous Wales Efficient use of resources, skilled, educated people, generates wealth, provides jobs</p>	<p>A neutral contribution.</p>	
<p>A resilient Wales Maintain and enhance biodiversity and ecosystems that support resilience and can adapt to change (e.g. climate change)</p>	<p>A neutral contribution</p>	

Well Being Goal	How does the proposal contribute to this goal? (positive and negative)	What actions have been/will be taken to mitigate any negative impacts or better contribute to positive impacts?
A healthier Wales People's physical and mental wellbeing is maximized and health impacts are understood	It positively contributes to the health of Gypsy and travellers through the provision of good quality site accommodation.	
A Wales of cohesive communities Communities are attractive, viable, safe and well connected	It positively contributes by helping the Gypsy and Traveller community settle in the area while at the same time acknowledge their tradition of being mobile. This will decrease the need for the Gypsy and Traveller community to set up unlawful encampments in unsuitable areas.	Through the provision of official sites both transit and permanent sites.
A globally responsible Wales Taking account of impact on global well-being when considering local social, economic and environmental wellbeing	The Gypsy and Traveller Community will have better facilities that will contribute to better physical wellbeing and will offer the Community the opportunity to better integrated into the general community as a whole.	
A Wales of vibrant culture and thriving Welsh language Culture, heritage and Welsh language are promoted and protected. People are encouraged to do sport, art and recreation	A neutral contribution	

2. How has your proposal embedded and prioritised the sustainable governance principles in its development?

Sustainable Development Principle	How does your proposal demonstrate you have met this principle?	What has been done to better to meet this principle?
 <p>Long-term</p> <p>Balancing short term need with long term and planning for the future</p>	<p>The Assessment has taken an evidenced based approach in determining the accommodation needs of the Gypsy and Traveller Community in the short term; over the next 5 years and for the remaining period of the Local Development Plan.</p>	
 <p>Collaboration</p> <p>Working together with other partners to deliver objectives</p>	<p>A steering group was set up comprising of important key stakeholders and members of the Gypsy and Traveller community. The purpose of the group was to take ownership and oversee the assessment process.</p>	
 <p>Involvement</p> <p>Involving those with an interest and seeking their views</p>	<p>A steering group was set up comprising of important key stakeholders and members of the Gypsy and Traveller community. The purpose of the group was to take ownership and oversee the assessment process.</p>	
 <p>Prevention</p> <p>Putting resources into preventing problems occurring or getting worse</p>	<p>No applicable</p>	

Sustainable Development Principle	How does your proposal demonstrate you have met this principle?	What has been done to better to meet this principle?
 <p data-bbox="159 347 304 376">Integration</p> <p data-bbox="331 213 517 400">Positively impacting on people, economy and environment and trying to benefit all three</p>	<p data-bbox="546 213 958 240">This requires further consideration.</p>	

3. Are your proposals going to affect any people or groups of people with protected characteristics? Please explain the impact, the evidence you have used and any action you are taking below.

Protected Characteristics	Describe any positive impacts your proposal has on the protected characteristic	Describe any negative impacts your proposal has on the protected characteristic	What has been/will be done to mitigate any negative impacts or better contribute to positive impacts?
Age	None	None	
Disability	None	None.	
Gender reassignment	None	None	
Marriage or civil partnership	None	None	
Race	The assessment will have a positive impact on the Gypsy and Traveller community by the provision of suitable sites	None	
Religion or Belief	None	None	
Sex	None	None	
Sexual Orientation	None	None	
Welsh Language	None	None	

4. Council has agreed the need to consider the impact its decisions has on important responsibilities of Corporate Parenting and safeguarding. Are your proposals going to affect either of these responsibilities? For more information please see the guidance note <http://hub/corporatedocs/Democratic%20Services/Equality%20impact%20assessment%20and%20safeguarding.docx> and for more on Monmouthshire's Corporate Parenting Strategy see <http://hub/corporatedocs/SitePages/Corporate%20Parenting%20Strategy.aspx>

	Describe any positive impacts your proposal has on safeguarding and corporate parenting	Describe any negative impacts your proposal has on safeguarding and corporate parenting	What will you do/ have you done to mitigate any negative impacts or better contribute to positive impacts?
Safeguarding	None	<i>No negative impacts</i>	
Corporate Parenting	None	No negative impacts	

5. What evidence and data has informed the development of your proposal?

Census Data
 Housing Register data
 Household Questionnaires

6. SUMMARY: As a result of completing this form, what are the main positive and negative impacts of your proposal, how have they informed/changed the development of the proposal so far and what will you be doing in future?

The main positive benefits of this mandate are:

- Additional accommodation options for Gypsy and Traveller households
- The Council is better able to meet its statutory duties under the Part 3 Housing (Wales) Act 2014
- The reduction in unlawful encampments within the County

The main negative impacts are:

7. Actions. As a result of completing this form are there any further actions you will be undertaking? Please detail them below, if applicable. No

What are you going to do	When are you going to do it?	Who is responsible	Progress

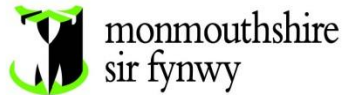
8. Monitoring: The impacts of this proposal will need to be monitored and reviewed. Please specify the date at which you will evaluate the impact, and where you will report the results of the review. – Not Applicable

The impacts of this proposal will be evaluated on:

Not Applicable

D
S
9
1
1
3

This page is intentionally left blank



SUBJECT: POLLINATOR POLICY UPDATE

MEETING: Strong Communities Select Committee

DATE: January 11th 2016

DIVISION/WARDS AFFECTED: ALL

1. PURPOSE:

- 1.1 To provide the Strong Communities Select Committee with a performance overview of the pollinator policy 22 months post implementation. In particular the perceived implications of the highway verge maintenance policy amendment (Budget Mandate proposal number B4) in relation to MCC's commitment to support WG Pollinator Action Plan.

2. RECOMMENDATION:

- 2.2 That the Select Committee consider the performance report.

3. KEY ISSUES:

- 3.1 The pollinator policy was adopted in 2014 and fully supports the Welsh Governments' Action Plan for Pollinators and the Natural Environment and Rural Communities act 2006. The Action Plan recommended new management systems in terms of planting regimes and resulted in reducing the first cut on A & B routes to safety cuts only and reducing the number of unnecessary cuts to large verged areas and elected public open spaces. The change in the management system resulted in a benefit saving of £43,555, whilst actively making the county more desirable to visit, live and work in.
- 3.2 Consultation with Town and Community Councils (T&CC's) was a requirement of the policy and as such, there are now regular and much improved discussions with T&CC's on how to replicate the flowering displays within their areas. Support for the policy has been given by numerous T&CC's, with one council requesting an extension to the safety cuts and reduced cuts in more rural areas.
- 3.3 On April 16th 2014 the Select Committee were presented with a report of petitions received, a petition with 163 signatures – opposed to the verge safety cuts on A&B roads and a 2nd petition with 766 electronic signatures, 74 emails and 6 individual

letters fully supporting the whole policy. This support has since grown with many residents and groups actively asking for reduced cuts to hedges and verges.

- 3.4 The Wales Environment Bill will place an enhanced biodiversity duties on Local Authorities when it receives royal ascent in the spring. This means that rather than just having regard for biodiversity, we will need to maintain and enhance biodiversity in exercising our functions, which dovetails the Council's commitment outlined in the Single Integrated plan to promote, protect and enhance Monmouthshire under the theme "Our County Thrives".
- 3.5 Within the first 6 months of implementing the policy, the Council received over 80 emails and 25 telephone calls in praise and support of the displays. Individual T&CC's and various environmental groups also took time to congratulate us on the work.
- 3.6 In the wider arena, the Council received applause from DEFRA, BBC's Country File, Spring Watch and Horticultural Weekly. Advice was sought from neighbouring Councils including Chard, Somerset and Crickhowell Town Council in addition Council officers have given presentations to a large proportion of Welsh LA's on the subject.
- 3.7 Since the implementation of the policy, officers received only one concern on issues of visibility/ safety from 1 Community Council and one resident and these concerns were addressed immediately.
- 3.8 Currently, highway verges are cut twice, with field hedges and verges receiving a safety cut in the summer, if there isn't a verge, for example within a large proportion of our narrower R and C routes, the hedge is cut to a metre high. It is worth noting that all field hedges are the responsibility of the land owner and are in their ownership as identified within section 154 of the Highways Act.
- 3.9 Mandate proposal Number B14 discussed the introduction of a change to the number of cuts when the new contract is issued, reducing them to one cut per year, with the exception of scheduled Urbanised areas of which will continue to receive two cuts. This will fully support the Pollinator policy and the groups/individuals wishes, which form the majority when commenting on the policy. It is proposed that local Community Councils will have the opportunity to fund additional cuts as required within their individual boundaries. The priority as always will be safety and confidence in this statement can be assured through the immediacy of grounds maintenance response to concerns by highly mobile compact tractor and flail units – this quick reaction will fully support the reduced cuts, in addition the section will continue to carryout out x3 cuts to scheduled visibility fence lines.

4. REASONS:

- 4.1 The overwhelming support for this policy can be considered as a statement of approval and as such lends weight to the need to increase sustainability, resilience and the biodiversity of our countryside.

5. RESOURCE IMPLICATIONS:

- 5.1 90% of the Highway verge network is cut by sub contract labour with only 10% cut by our own staff.

6. BACKGROUND PAPERS:

Highways Act 1980

Well Maintained Highways – code of practice

National Action Plan for Pollinators

Welsh Government – Managing roadside verges for wildlife in wales

Sustainable Landscape Management (landscape and Environmental Services)

7. AUTHOR:

Alison Howard

8. CONTACT DETAILS:

Tel:

E-mail:

This page is intentionally left blank