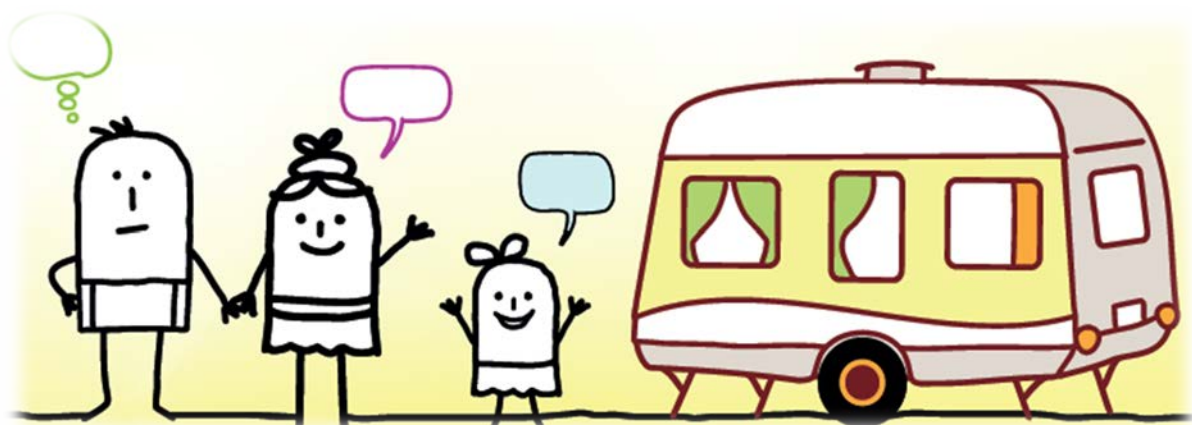


Gypsy and Traveller Accommodation Assessment 2015-2020



STRONG HERITAGE | STRONG FUTURE
RHONDDA CYNON TAF
TREFTADAETH GADARN | DYFODOL SICR

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Chapter One: Introduction and Policy Context

Introduction

Local authorities have a requirement to consider the housing accommodation needs of their localities under section 8 of the Housing Act 1985. This requirement is vital for authorities to have a comprehensive understanding of the intricacies of their local housing market(s) and to provide a robust evidence base for effective strategic housing and planning services. Originally, Section 225 of the Housing Act 2004 placed a further statutory requirement on local authorities to conduct a formal assessment of the accommodation needs of Gypsies and Travellers residing in or resorting to their area. This duty has since broadened in Wales after the Housing (Wales) Act 2014 received Royal Assent. Welsh Local Authorities are now required to undertake Gypsy and Traveller Accommodation Assessments (GTAAAs) and to make provision for sites where the assessments identify an unmet need for mobile home pitches. This GTAA has thus been prepared in accordance with Welsh Government Guidance to enable Rhondda Cynon Taf County Borough Council to discharge its' statutory duties under Part 3 of the Housing (Wales) Act 2014. This Assessment will be refreshed and re-submitted to the Welsh Ministers every five years to comply specifically with sections 101 and 102 of the Act.

Gypsies and Travellers are defined within section 108 of the Housing (Wales) Act 2014 as,

- 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 is a broad definition, which Welsh Government deems "necessary to achieve a full understanding of the accommodation needs of these communities" (WG, 2015a, para. 12). It is however stressed that Gypsy and Traveller families in bricks and mortar housing should also be considered to both help determine need for new sites and ascertain how conventional housing can potentially suit the needs of such communities.

Hence, the main objective of this study is to ensure there is comprehensive local understanding of the current and projected accommodation needs of Gypsies and Travellers in Rhondda Cynon Taf. This will help to deliver one of the key priorities of the Rhondda Cynon Taf Local

Housing Delivery Plan; to enable a functional housing market, where everyone is housed suitably and affordably regardless of income. This aim extends comprehensively to Gypsies and Travellers and it is vital that they have the same access to culturally appropriate accommodation as other members of the community. Indeed, it is felt that, “enabling a functional and balanced local housing market is fundamental to fostering social inclusion, health and well being and ensuring robust and prosperous communities within Rhondda Cynon Taf” (RCTCBC, 2013, p.7). This GTAA will help to identify, understand and provide the evidence to address the specific accommodation needs of Gypsies and Travellers via the local planning and housing policy framework, thereby contributing to a wide choice of local accommodation options. It is necessary to identify whether there is need to extend the existing Council site, whether any extra site provision should be enabled on public or private sites, and whether there is need to plan for provision of transit sites within the County Borough.

Duties, Powers and National Guidance

Circular 30/2007 states that where there is an assessment of unmet need for Gypsy and Traveller accommodation in the area, suitable sites should be allocated in the Local Development Plan to help meet this need. These sites should duly consider proximity to existing settlements and local services (i.e. education, healthcare and other facilities), along with the current working patterns of Gypsies and Travellers. Similarly, Circular 78/91 states that local planning authorities should consider the needs of Travelling Showpeople when preparing local plans, based on a realistic assessment of the amount of accommodation required (including where there has been a tradition of site occupation and/or new local need for sites). Due to the somewhat unique combination of residential, storage and maintenance uses on such sites, their proximity to the road network and impact on the environment needs to be duly considered.

In addition to site specific allocations, Circular 30/2007 also requires criteria based policies within Local Development Plans, irrespective of current need, to cater for any future or unexpected demand. This can be accompanied by a Gypsy and Traveller rural exception site policy where there is a lack of affordable land to meet local Gypsy and Traveller needs. This national policy framework is designed to ensure more certainty for all concerned when determining relevant planning applications, to help to avoid unauthorised camping and development in the future and ensure that the accommodation needs of Gypsies and Travellers can be met.

Each circular also clarifies that ownership arrangements can take several forms; whether Gypsies and Travellers find their own sites to develop and manage or lease them privately from a third party. However, it is stressed that public site provision will still be required for those unable to afford these options and/or any families that require transit sites. Part 5 of the Mobile Homes (Wales) Act 2013 provides powers for a local authority to provide sites within its area to locate mobile homes for holidays and other temporary purposes or for use as permanent residences. This power includes provision of sites to accommodate Gypsies and Travellers along with the necessary working space, services and facilities for them to carry out conventional related activities. These sites can be managed directly by the local authority or leased to another person, and recent Welsh Government Guidance on Designing Gypsy and Traveller Sites helps to ensure local authorities provide “appropriate services at reasonable cost to the public purse...[and] to ensure their sites are fit-for-purpose” (WG, 2015b, para. 1.5). Whilst these powers do not necessarily mean extra local authority owned sites will be required, the local authority is responsible for providing them where they are. The Mobile Homes (Wales) Act 2013 also gives local authorities the powers to enforce standards on private sites.

The Design Guidance is specifically intended to ensure that relevant sites;

- are sustainable, well managed and maintenance is planned and not always reactive;
- are equivalent to the relevant parts of standards which would be expected on other types of mobile home sites and social housing; and,
- create the necessary conditions to encourage and develop good relations between Gypsies and Travellers and the settled community, and between site residents and owners / managers (WG, 2015b, para 1.9).

The Guidance also emphasises that there is an ongoing commitment through the Sites Capital Grant to fund (up to 100% of capital costs) refurbishment of existing sites and to develop new sites. The maximum funding per project is £1.5m, and is based upon the costs of developing a twelve pitch site. The guidance recommends that new sites comprise 20 pitches or less, and encourages consultation with (potential) site residents when designing the physical layout.

The actual location of sites is another key issue addressed by the Design Guidance and it is made clear that local authorities should carefully consider access, suitability of land, local services, environment, utilities and sustainability. Although key sources of data such as the Caravan Count and the findings of the GTAA can inform preferences around location, it is made clear that “other factors such as availability of land, site sustainability and achievability of

planning permission will be more significant matters to consider” (WG, 2015b, 3.17). Furthermore, whilst there has been a trend towards Gypsies and Travellers becoming more ‘settled’ on permanent pitches or in conventional housing, the Sites Capital Grant can also be used to fund transit sites to “facilitate the traditional Gypsy and Traveller way of life” (WG, 2015b, para 6.1). This is considered appropriate where local authorities experience frequent unauthorised encampments; the locations of which should be used to influence the setting of any transit site.

Chapter Two: Background and Analysis of Existing Data

Previous Assessment, Local Development Plan Policies and Progress Hitherto

The previous Gypsy and Traveller Accommodation Assessment for Rhondda Cynon Taf was carried out in 2007 and formed part of the adopted Local Development Plan Evidence Base. In terms of identifying need, the Assessment specifically stated, “6 families are seeking a pitch on the local authority caravan Site, and 2 families are seeking accommodation on a private site” (RCTCBC, 2007, p17). This identified need led to the allocation of Beddau Caravan Park for the development of an 8-pitch Gypsy and Travellers site within the adopted Local Development Plan (Policy SSA 26 refers). Supporting paragraph 5.97 states, “the Council considers that the Beddau Caravan Park site would meet the needs identified in the Draft Gypsies and Travellers Study. However, the Council intends to keep the requirement for the provision of Gypsies and Traveller sites in Rhondda Cynon Taf under review” (RCTCBC, 2007, para. 5.97).

Historically, the Council owned Beddau Caravan Park and was originally developed in 1968 to provide a suitable form of accommodation for Gypsy and non-Gypsy households. Planning permission was granted for 50 pitches and site conditions were stipulated in the form of a licence. For many years, the site was fully occupied by permanent residents with several transit pitches. The site was designated for closure in 1998 and a number of Gypsy Traveller families left the site, many moving into bricks and mortar accommodation. Prior to the new Common Housing Register being established in 2012, there had been no waiting list for the site and it was thus difficult to calculate the net need for pitches.

In 2010, the Park had 7 occupied pitches, although there were no usable vacant pitches due to the general condition of the facilities and the overall environmental condition of the site. Following the adopted Local Development Plan allocation, the Council bid to refurbish six pitches and accepted an offer for the Welsh Gypsy Traveller Site Refurbishment Grant in respect of Beddau Caravan Park in March 2010. Continuous engagement with the site residents ensured an understanding and support for the works; resulting in a design that is based on their individual needs and the community as a whole. The refurbishment successfully met the original aim of being completed within a 12 month period, with:

- New drainage
- New infrastructure and services

- Levelling of site topography to facilitate the provision of 6 purpose built pitches (an additional pitch was also provided for one of the original residents who is not a Gypsy or Traveller)
- The erection of 6 high specification utility blocks

Residents have settled back on site in 2011 and new license agreements were devised and approved. The refurbishment has helped improved the overall quality of life, health and well being of site residents and further enhancements have taken place. Passive design features have provided enhanced security on site whilst maintaining a family friendly environment that engenders community pride.

Most of the pitches on the site have remained occupied since the refurbishment was completed and turnover has been low. In total, there have been three vacant pitches since 2012, all of which have been re-allocated to new households through the Common Housing Register. There are no households having identified themselves as 'Gypsy, Romany or Irish Traveller' currently waiting for a caravan pitch on the Common Housing Register, although this should not be considered representative of needs of the Gypsy and Traveller community as a whole. There could nonetheless be scope to expand the current site if need dictates as the original allocation was for 8 pitches as opposed to the 6 currently sited.

In addition to the allocated site itself, the adopted Local Development Plan contains a criteria based policy to cater for any future or unexpected demand; ultimately to allow for the provision of needs which cannot reasonably be accommodated at the Beddau Caravan Park site. Policy AW 15 states,

Proposals for the use of land for the stationing of caravans occupied by Gypsies, Travellers and Travelling Show People will be permitted where it can be demonstrated that the proposed development:

1. Cannot be accommodated on the site allocated by policy SSA 26;
2. Is reasonably related to local services;
3. Where possible is located on previously developed land;
4. Includes sufficient space for parking and manoeuvring of all vehicles associated with of all vehicles associated with the occupiers within the site curtilage;
5. Is provided with adequate on-site services for water supply; power; drainage; sewage disposal; and waste disposal facilities;
6. Does not adversely affect surface or ground water resources

(RCTCBC, 2011, p.66).

Supporting paragraph 5.98 further clarifies,

the aim of this policy is to allow the development of land for sitting of caravans for Gypsies, Travellers and Travelling Show People in appropriate locations. In order to safeguard the character and appearance of the area development proposals will need to demonstrate that do not adversely affect the amenity of existing residential areas, the safe operations of the highway network, the provision of car parking and visual amenities (RCTCBC, 2011).

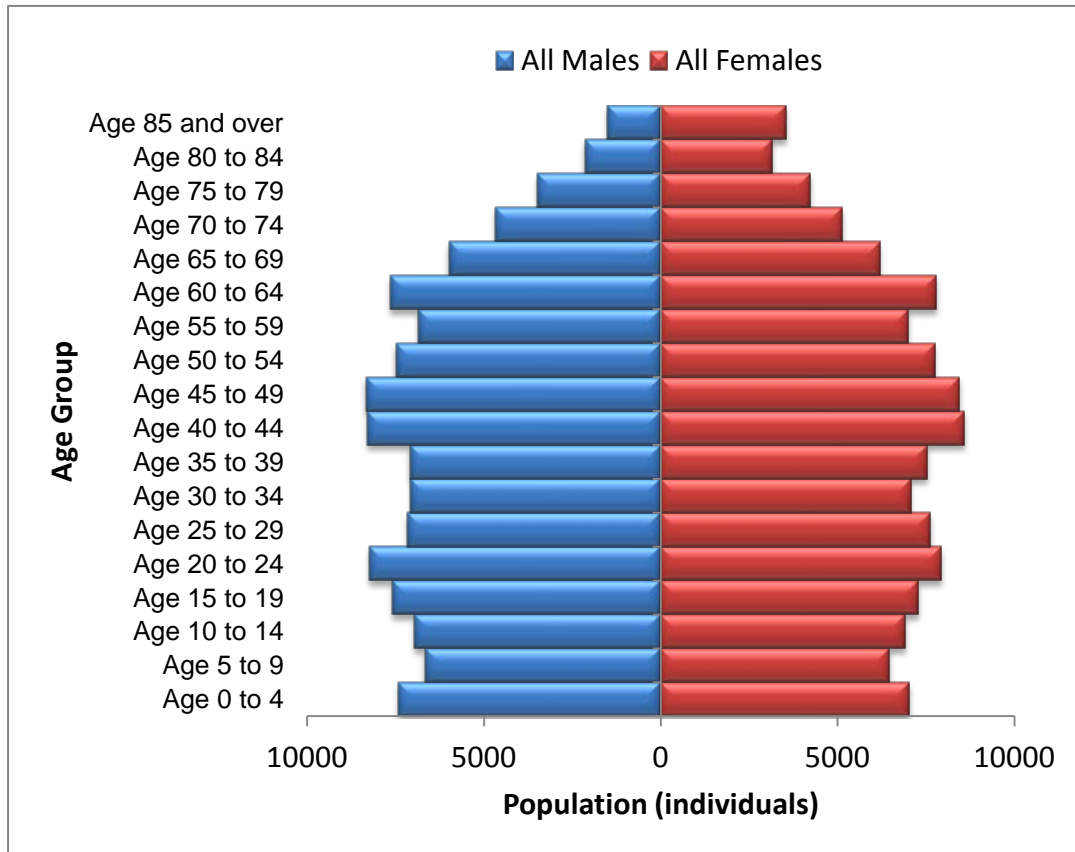
Census Population Data

For the first time, the 2011 Census included a dedicated 'tick box' for the ethnic group 'Gypsy or Irish Traveller'. The collated results also included anyone who wrote Gypsy or Traveller in the 'any other White background' question, yet excluded those who had written 'Roma' as they were considered "a distinct group with different needs to Gypsy or Irish Travellers" (ONS, 2014, p.2). ONS also ensured that they maintained a full address list of Gypsy or Traveller sites (whether official or unofficial) to distribute the questionnaire. Across the whole of Wales, 2,731 people chose to identify themselves as Gypsy or Irish Traveller, which equates to 0.09% of the identified Welsh population. In Rhondda Cynon Taf alone, there were 53 individuals who had selected Gypsy or Irish Traveller on their Census return; equivalent to 0.02% of the local population, and nearly five times less than the Welsh average in relative terms. The Census did not however provide a sub local authority breakdown given the small numbers of responses.

The most common age band for those selecting Gypsy or Irish Traveller was 25-29, which was far lower than the average for Rhondda Cynon Taf as a whole (40-44) at the time. This can be visualised by the two population pyramids in Figures 1 and 2 overleaf. These Figures also help to visualise just how small a proportion of the local population selected Gypsy or Irish Traveller in the Census. It is however important to emphasise that

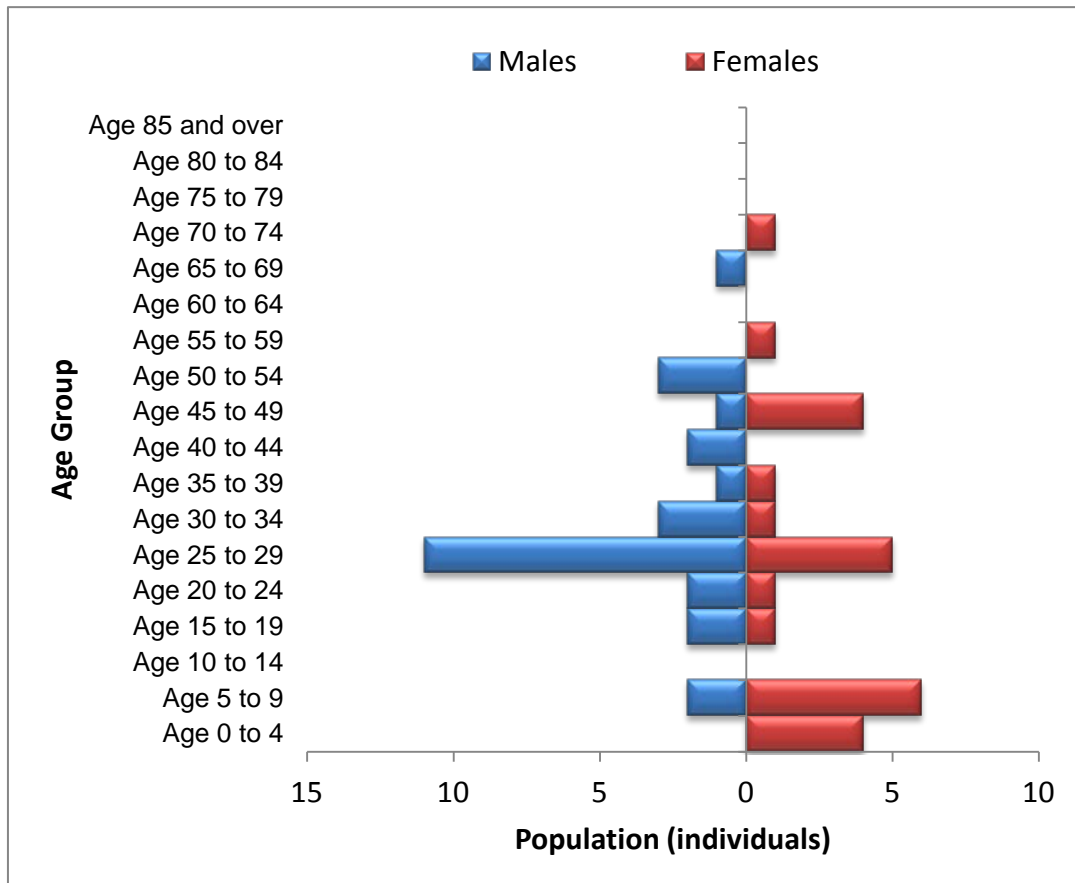
this total may exclude other members of these communities who declined to self-ascribe their ethnicity for fear of discrimination, stronger affiliation with other ethnicity categories (e.g. White Irish) or for other reasons though attempts were made by the Office for National Statistics to address these issues (WG, 2015a, para. 16).

Figure 1 Rhondda Cynon Taf Population Pyramid (all ethnicities)



Data Source: 2011 Census

Figure 2 Rhondda Cynon Taf Population Pyramid (Gypsy or Irish Traveller)



Data Source: 2011 Census

With this limitation in mind, the 2011 Census identified whole house or bungalow as the most common type of accommodation for respondents who identified as Gypsy or Irish Traveller, at 71%, which is far lower than for all usual residents in Rhondda Cynon Taf (95%). Flat, maisonette, apartment, or mobile/temporary accommodation accounted for 29% of Gypsy or Irish Travellers accommodation, well above that for Rhondda Cynon Taf as a whole (5%). Given that the numbers of the former are so small, it is not possible to provide a separate breakdown by caravan or other mobile or temporary structure. However, these trends do seem to reflect other research, which “estimated that between half to three quarters of Gypsy or Irish Travellers live in bricks and mortar housing” (ONS, 2014, p.16).

The 2011 Census also indicated that there were 22 **households** that had selected Gypsy or Irish Traveller on their return, which means that related average household size is 2.4 persons. In terms of tenure, the level of home ownership was lower for this ethnic group (55%) compared to all households in Rhondda Cynon Taf (71%) and the remainder were split between social rented accommodation (27%) and private rented accommodation (18%). Whilst the proportion residing in social housing is around 14% higher than on average, the proportion in private rented accommodation is broadly comparable to the general population, albeit 3% higher.

Caravan Count, Current Accommodation Provision and Planning History

A Gypsy or Traveller residential site is defined as,

A permanent residential site [that] 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 (WG, 2015, p.3).

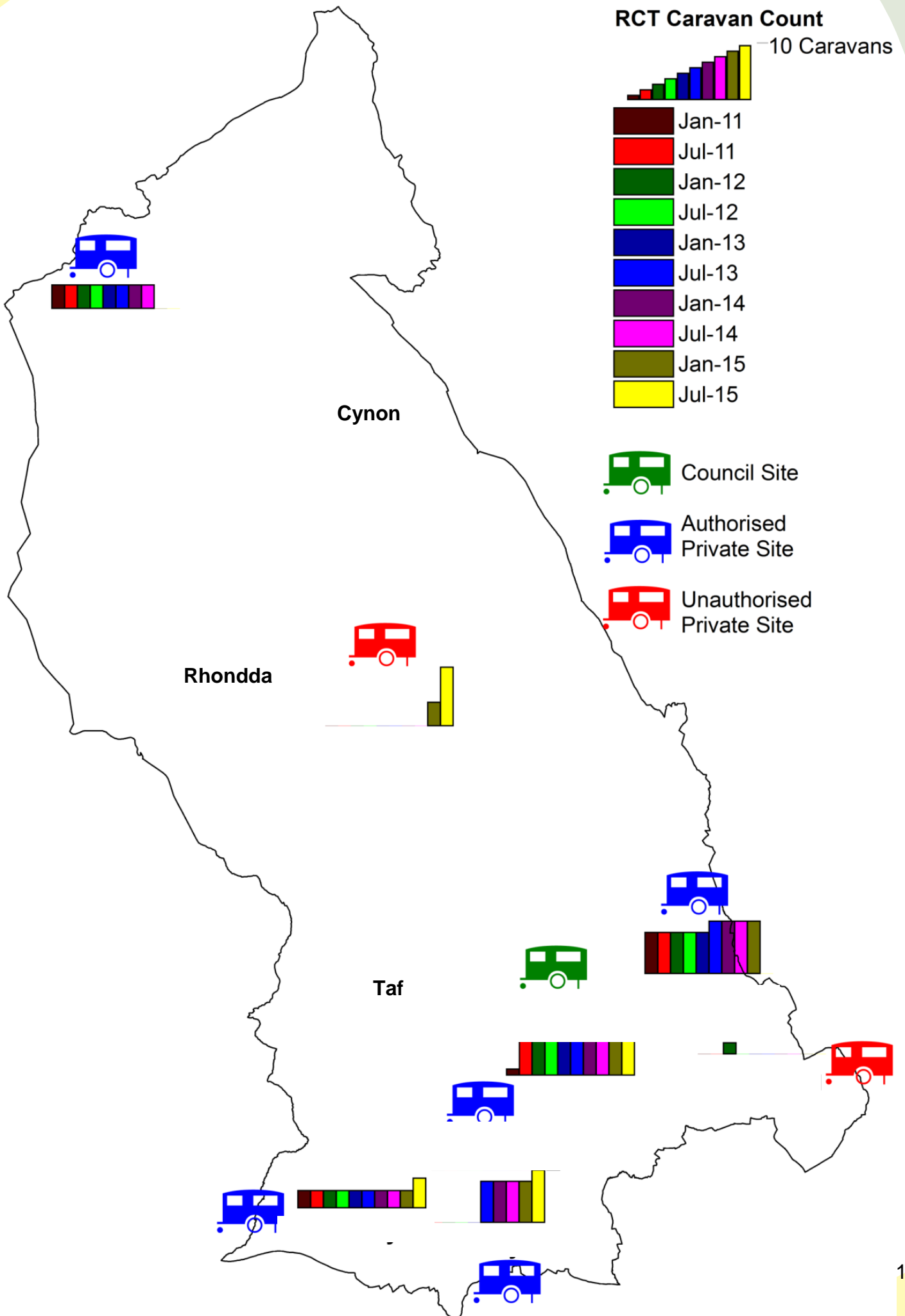
Private sites are bought and developed by Gypsies or Travellers for permanent residence for their immediate family or extended family members i.e. like private sector owner occupation and renting. On the other hand, public sites are provided by local authorities and a pitch on the site is rented from the authority, although residents have license agreements rather than tenancies. The Council monitors the number of residential sites within its administrative boundary via the biannual caravan count. This was reintroduced in Wales in 2006 and is conducted by local authorities in January and July. It sets out the number of Gypsy and Traveller caravans on

authorised and unauthorised sites in Wales, and details of pitches on local authority sites. As the Welsh Government explain,

a 'caravan' can include any of the following: mobile homes, caravans, trailers and other living-vehicles on Gypsy or Traveller sites and encampments, whether or not they meet the strict legal definition of a caravan; touring caravans on Gypsy or Traveller sites and encampments even if not lived in permanently; tents, benders or yurts where these are the 'permanent' living accommodation of Gypsies or Travellers (WG, 2015c, p.12).

Counting in this manner helps to ensure that any transient caravans are not double counted across Wales, although it does fail to record the affects of seasonal fluctuation on caravan numbers. Another principal limitation is that this method counts caravans and not families plus it fails to include Gypsies and Travellers living in bricks and mortar housing. It must therefore be emphasised that the count itself is not designed "to be an estimate of the Gypsy or Irish Traveller population in Wales" (WG, 2014c, p.8) and also "does not provide information on households' needs, wishes, aspirations or incomes" (WG, 2014b, p.16). Nevertheless, it does help to provide a starting point for identifying and mapping Gypsy and Traveller communities and is useful when triangulated with other sources of qualitative data. Indeed, Figure 3 overleaf illustrates the locations of caravans counted across Rhondda Cynon Taf from January 2011 to July 2015. As evident from Figure 3, the caravan counts have been relatively static over the last four and a half years, with five documented established sites. More recently though, there have been some changes to the data recorded; some can be merely explained by definition issues and some are attributable to changes in the Gypsy and Traveller population within Rhondda Cynon Taf. These site specific changes will now be further analysed in turn, complemented with information from local Planning records.

Figure 3 Rhondda Cynon Taf Caravan Count January 2011-July 2015



Local Authority Site in Taf

This is an authorised, permanent Council site, granted planning permission in 2010. Seven caravans have always been recorded on the site, notwithstanding the low count in January 2011 when the refurbishment works were being undertaken. There are indeed still seven caravans on the site, although one does not belong to a Gypsy or Traveller; it belongs to one of the non-Gypsy households still residing on the site from the original development. This caravan was thus erroneously included in the Caravan Count up until July 2015, when six caravans were correctly reported (i.e. one less than previously recorded). The six pitches are permanent and weekly fees are payable directly to the Council.

Caravan Site in Taf

There is no significant planning history on this long-established private site; it dates from around 1970 so would not be subject to planning enforcement. Whilst this isn't a Gypsy or Traveller site, there have been a number of households with Gypsy and Traveller roots living on this site from time to time. From January 2011 to January 2013, seven caravans were recorded on this site; increasing to nine in the following four caravan counts. However, the July 2015 count has not reported any caravans on this site. This was in fact due to new information that was received by the Housing Strategy and Standards Team explaining that no Gypsies or Travellers were residing on the site (notwithstanding the presence of caravans). Subsequent discussions with the site owner revealed there were four Gypsy households temporarily residing on site.

Gypsy Site in Taf

There is a history of seven planning applications on this site dating back to 2006. The majority were withdrawn, although the most recent of which was granted in 2009 for 'the stationing of caravans for two Gypsy pitches with hardstanding ancillary to that use'. This site is thus a permanent, private authorised Gypsy site and previous caravan counts had always recorded three caravans on the site, which tallies with the planning permission. However, the most recent count in July 2015 recorded an additional two caravans, now totalling five. Subsequent visits have revealed that these two extra caravans are no longer on the site, suggesting they were just visiting.

Traveller Site in Cynon

Planning permission was granted on this private site in 2009 for the 'change of use of land from agricultural to a one family Traveller site, including stationing of 2 mobile homes, 2 touring caravans, parking and small wash house/utility building. Indeed, all caravan counts on record

noted that the site permanently housed four caravans. However, during the course of the latest caravan count it was discovered that the residents had accepted an offer for the land from an adjoining land owner and had moved off site. Their moving patterns are unknown to the Council, although the landowner has indicated that the site itself will no longer be used as a Gypsy or Traveller Site and is not in contact with the previous occupants. All other sources of information available do not indicate that these residents are still living within Rhondda Cynon Taf.

Travelling Showperson Site in Taf (1)

This is a longstanding, permanent site that was missed from previous caravan counts. It accommodates Travelling Showperson families and four caravans were recorded in July 2015. Planning records indicate that the site has been used for over 50 years for the seasonal storage of fun fair vehicles and equipment for much of this time. An area of land was also transferred to the owners by the Council in 1998 as part of a compensation package when the Council acquired other land by compulsory purchase for Park and Ride facilities and construction of a housing estate. Planning reports around the year 2000 indicate an extended family in residence at this site, although there is no planning history since 2005. The site would thus not be subject to planning enforcement action. Recent visits have shown that there were three caravans on pitches on site, although two of those caravans were vacant (one of the occupants had moved into a nursing home and the other occupant was abroad). Furthermore, there was another caravan being stored on site although not on a pitch.

Travelling Showperson site in Taf (2)

This is a permanent private site for Travelling Showpeople; split between two yards in close proximity to each other. Neither yard has any traceable planning history of any relevance. Also, given that the yards are so long-established they would not be subject to any planning enforcement action. This site was not included in caravan counts prior to July 2013 as the original definition used by the Department for Work and Pensions did not include Travelling Showpeople. This definition was later changed by Welsh Government and this Travelling Showperson site was included from July 2013; with seven caravans recorded. This remained unchanged until the most recent count found two additional caravans on the site; nine in total. However, more recent visits have shown that there were only three caravans on site and the residents confirmed that the others had moved off site to a site in Bridgend County Borough.

Unauthorised Encampment in Rhondda

This site was a previous local authority site that was sold on the open market. The current owner now lives abroad. In December 2014, a group of New Age Travellers arrived on site and placed a boulder on the entrance. Four caravans were recorded on site in the January caravan count; rising to 10 in the July 2015 count. Indeed, the number of caravans has fluctuated since the encampment has been in existence, although a visit in December 2015 revealed that there were a total of five caravans clustered on one particular part of the site. Whilst this is an unauthorised encampment, no formal action has been taken by the Council and the Travellers have not been threatened with eviction by the absentee owners. However, this situation may change and will be monitored by the Local Authority.

Unauthorised Site in Taffs Well

An unauthorised encampment of two caravans was recorded in the January 2012 caravan count, although the occupants were only on site temporarily and there have been no further instances of caravans on the site. The destination of these Gypsies or Travellers was unknown.

This caravan counting process will shortly be developed into a continuous log of unauthorised camping across Wales, to further supplement the biannual data collection. This will provide superior data at the local level regarding the location, frequency, size and type of unauthorised sites to help better plan to meet accommodation needs of Gypsies and Travellers. Historic Planning Records also indicated instances of two other sites that had not been recorded by the Caravan Count, as will be elaborated on in turn.

Gypsy and Traveller Site in Taf

The first of which related to a Gypsy and Traveller Site application for two residential caravans and one touring caravan. Two planning applications were initially refused and then dismissed at appeal in 2002 and 2006, respectively. Discussions with Housing Officers revealed that the household later moved into bricks and mortar within the social rented sector, although ended the tenancy in 2013. The subsequent moving patterns of the household are unknown to the Registered Social Landlord or the Council.

Travelling Showperson Site in Cynon

Planning permission was granted on appeal in 2006 for the change of use of the land (last used as a coal processing yard) to a Travelling Showpeople's depot and winter quarters, including living accommodation and storage and maintenance of fairground equipment. According to

planning records, there were 6 people living on the site (from the same family, spanning three generations). This private site had previously been missed from the caravan count, although was found to still be permanently located on the land and is certainly authorised.

Unauthorised Encampments

During the course of this Assessment, there were also two unauthorised encampments recorded on **different sites** in Talbot Green. The first comprised of three caravans and the second comprised of four. Residents of both encampments were approached during the course of this Assessment but did not wish to participate in the survey and moved off the respective sites several days later. This will be further elaborated on in Chapter Four.

Other recent unauthorised encampments were recorded in the summer months of 2013; with seven caravans on a site in Abercynon, three on a site in Aberdare and two on a site in Treherbert. These are all geographically distinct areas and the residents moved on in several days to unknown locations outside of Rhondda Cynon Taf.

Other Population Data

Health

The Housing Strategy Team engaged with Cwm Taf University Health Board to determine whether any additional population data was held. Internal meetings with the Health Visitor Team Leaders revealed that Gypsies and Travellers from two authorised sites had occasionally made themselves known. These individuals were already known to the Council and had been invited to take part in the GTAA Survey. No other information was held by GP Surgeries.

Council Staff

The Council is the largest employer in the whole of Rhondda Cynon Taf. A voluntary equality and monitoring survey was conducted of staff in mid 2015, which included the option for workers to identify themselves as Gypsies or Travellers. Following internal dialogue with the Council's Equality and Diversity Team, no member of the Council chose to identify themselves as a Gypsy or Traveller.

Education

Internal discussions with the Council's Education department revealed that there were twelve Gypsy and Traveller children known to the Local Education Authority, based on the individuals personally identifying their ethnicity at some point. Two of these individuals resided within bricks

and mortar (in the same household), whereas the remainder resided on the aforementioned sites. Each respective household was contacted and invited to take part in the GTAA Survey.

Common Housing Register

The Common Housing Register enables households to apply for affordable housing in Rhondda Cynon Taf. As part of equality and diversity monitoring, applicants can choose to describe their ethnic origin as “Gypsy, Romany, Irish Traveller” and apply for conventional housing or a caravan pitch. At the time of conducting this GTAA, there were no households selecting this ethnic origin waiting for a caravan pitch in Rhondda Cynon Taf. There was however one household that had described their ethnic origin as “Gypsy, Romany, Irish Traveller” waiting for a flat. This household was duly contacted to take part in the GTAA survey.

Chapter Three: Methodology

Preparation

Existing data alone is not deemed sufficient to carry out a GTAA due to the small population size of Gypsy and Traveller communities and the lack of information held regarding needs, preferences and access to private sites. Sole reliance on secondary data could “create unforeseen errors in projections over time”, and therefore, a “more in-depth Census (or ‘primary’ data survey) is required to assess the needs of Gypsy and Traveller communities” (WG, 2015a, para. 21). However, it is essential that the process is supported by all stakeholders given the sensitivity that surrounds Gypsy and Traveller issues and the fact that community members can often be unwilling to engage with public sector bodies. Significant preparation work was therefore undertaken as part of this GTAA to help ensure the process was credible and understood by all related parties.

The Housing Strategy Team played the key role in this respect; getting all key stakeholders in a co-ordinated and unified manner. A Project Lead was appointed within the Housing Strategy Team itself, assisted by several other Housing Strategy Officers and working in close collaboration with an appointed Officer within the Planning Department. The Project Lead and several of the other Officers attended Welsh Government Training on carrying out GTAA's in preparation.

Steering Group and Focus Group

Prior to commencement of any surveys, a steering group was set up to oversee the production of the assessment. The Steering Group had a range of responsibilities including designing the study aims and outcomes, determining the researchers, publicising the study to stakeholders and providing local knowledge to inform the research. The Steering Group encompassed a range of officers with established knowledge of and existing relationships with the Gypsy and Traveller community in Rhondda Cynon Taf. More specifically, the Steering Group comprised of representatives from:

- Cwm Taf University Health Board
- RCTCBC Beddau Caravan Park (Manager)
- RCTCBC Community Safety Partnership
- RCTCBC Consultation Team
- RCTCBC Education
- RCTCBC Equality and Diversity
- RCTCBC Housing Strategy
- RCTCBC Planning Department
- South Wales Police

Two Cabinet Members were also kept up to date with the Steering Group; the Deputy Leader and Cabinet Member for Tackling Poverty, Engagement & Housing plus the Cabinet Member for Children's Social Services, Equalities & the Welsh Language. Other representatives from Save the Children, Gypsies and Travellers Wales and the Romani Cultural and Arts Company were invited to join the Steering Group but were unable to attend.

This latter stakeholder in particular would have otherwise helped to fulfil the recommendation of the Assessment Guidance (WG, 2015a, para. 58) to include a member of the Gypsy and Traveller Community on the Steering Group. A more practical solution was however reached to mitigate this issue; creation of a focus group. Indeed, given the wide geographical spread of different sites across Rhondda Cynon Taf, it was deemed more rational to visit a site directly and hold a more informal yet tailored focus group meeting, as suggested during a Welsh Government training session. Discussing the GTAA process broadly with the Focus Group provided the opportunity for community members to comment on engagement techniques, raise likely questions the community would have and provide advice on managing expectations. The lead officers ensured that the views of the Focus Group were given due weight and fed back to the overall Steering Group.

Specifically, the Focus Group discussed a range of issues as summarised below:

- The Group felt that the flyer was good, clear and fit for purpose. It was particularly praised for its eye catching colours and pictures and deemed to be easy to understand.
- The Group suggested leaving copies of the flyer in motorway services and petrol stations in addition to public facing offices throughout Rhondda Cynon Taf.
- The Group felt the best way to engage with Gypsies/Travellers is face to face by arranging a meeting through someone known to them. The Group however acknowledged that this wasn't always possible, and it may then be best to try and contact people by phone or letter. The Group emphasised that there were low literacy levels amongst the community, although there is usually somebody on a site that can read a letter. The Group however advised against turning up unannounced where possible.
- It was deemed best to engage with those living in bricks and mortar through a family contact initially, or failing that via a telephone call. Letters were not deemed appropriate due to literacy levels amongst the related population and the Group did not feel that turning up on the doorstep uninvited would be very successful.

- The Group however warned against pushing people too hard. It was felt that if a household is desperate or in genuine need, they will call the number on the flyer/poster and partake in the survey. It was nonetheless emphasised that the purpose of the GTAA should be clarified from the outset to ensure people know exactly what they are taking part in and what the likely outcomes will be.

The Steering Group itself met prior to the commencement of the Assessment itself and initially began discussing the ultimate aims of the research; to fulfil the Council's statutory duties and to understand the accommodation needs of Gypsies and Travellers within Rhondda Cynon Taf. The questionnaire provided by Welsh Government was also scrutinised and the Group concluded that it was suitable for the purpose of the research aims and no further additions were required.

One of the other key principle topics of initial discussion was to establish exactly who would be undertaking the evidence gathering and analysing the corresponding data. The Group explored a range of options including using consultants to carry out the surveys only or conducting the whole Assessment in-house. To better inform these discussions, a meeting with several neighbouring authorities was held to discuss comparative approaches and it was discovered that most neighbouring authorities had established links with the community and would be carrying out the research in-house. The Steering Group therefore decided that the whole GTAA would be conducted in-house, disaggregated into two key elements. Firstly, three officers were appointed to carry out the primary research (the Beddau Caravan Park Manager, the Housing Delivery and Engagement Officer and the Community Cohesion Officer). This was due to some Officers having existing links with certain parts of the Gypsy and Traveller Community and others having consultation experience. To support these officers, a communal database was established for different internal departments to share data in manner that complied with data protection, and the local knowledge held by members of the Steering Group was duly pooled. Secondly, one of the Housing Strategy Officers was appointed to take the lead role in analysing the data itself and producing the GTAA report given extensive previous experience of conducting similar research projects such as the Local Housing Market Assessment.

The final preparatory decision made by the Steering Group regarded the promotion of the whole process to the community. Officers with existing links to certain sites and families ensured that residents were informed verbally of the GTAA process, the respective benefits, and how to go about taking part. These same residents were also asked to circulate this information with family

and friends in the community. Indeed, this was recommended by the Focus Group as a principal means of promoting the GTAA and gaining trust. To complement this approach, and the national advert placed by Welsh Government in World's Fair, the Steering Group recommended producing an eye catching flyer with minimal words for widespread local distribution. Rhondda Cynon Taf County Borough Council collaborated with Caerphilly County Borough Council and Merthyr County Borough Council to utilise the same graphic, colour scheme and style for consistency purposes. This was very widely distributed to local housing association offices, libraries, leisure centres, One 4 All Centres, shops, cinemas and petrol stations as recommended by the Focus Group. It was also placed on the Council's website. A copy of the bilingual flyer is included in Appendix 1. The Council also endeavoured to engage with as many organisations that had contact with Gypsies and Travellers in Rhondda Cynon Taf as possible. These included Save the Children, the Romani Cultural and Arts Company, Gypsies and Travellers Wales and the Showmen's Guild. However, no new contact information was provided by these organisations. Local information was nonetheless provided by Education, the Beddau Caravan Park Manager, the Common Housing Register and the University Health Board, which fed into the communal database in preparation for the commencement of surveys.

Engagement with other local authorities

During the course of the GTAA process, numerous discussions were held with neighbouring authorities and existing strategic links were exploited. In addition to regular one to one contact, more formal updates were provided at the quarterly South East Wales Regional Housing Forum Meetings and the All-Wales Gypsy and Traveller Accommodation Forum. Discussions at earlier Forum Meetings centred on the methodology different local authorities were planning on employing. The majority were going to conduct the Assessment in house, whereas several were planning on utilising consultants. Regional Officers also discussed ways of advertising the process and the consensus was that simplified and illustrative flyers would be utilised and distributed. Clear lines of communication were also established in the event that surveys revealed respondents with long-standing connections in neighbouring authorities and/or where Gypsy and Traveller populations regularly move across administrative borders. Regular updates on progress and issues with surveys were also fed back to the Forums periodically to engender effective discussion.

To ensure all forms of engagement were completed, Table 1 documents the checklist provided by Welsh Government.

Table 1: Engagement Checklist

1.	Visit every Gypsy and Traveller household identified through the data analysis process up to 3 times, if necessary.	All households identified on the communal database were visited or contacted up to 3 times unless they specifically indicated that they did not wish to participate in the Assessment. Refer to interview log (Table 2).
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.	An eye catching flyer was placed in local housing association offices, libraries, leisure centres, One 4 All Centres, shops, cinemas and petrol stations as recommended by the Focus Group. It was also placed on the Council's website. Welsh Government placed an advert on behalf of Welsh Local Authorities in World's Fair, although not in Travellers' Times as it was not due to be published until November, which Welsh Government deemed too late.
3.	Consult relevant community support organisations.	A number of community support organisations were engaged including Save the Children, the Romani Cultural and Arts Company, Gypsies and Travellers Wales and the Showmen's Guild. However, no new information was received.
4.	Develop a Local Authority waiting list for both pitches and housing, which is accessible and communicated to community members.	A local authority waiting list has been in operation since October 2012 as part of the overall Common Housing Register. The application form provides the option for households to indicate their ethnicity as 'Gypsy, Romany, Irish Traveller' and apply for caravan pitches as well as all other forms of accommodation available. At the time of conducting the GTAA, one such household was identified on the waiting list, although for a flat as opposed to a caravan pitch. Contact was made with this household although the household chose not to respond.

5.	Endeavour to include Gypsies and Travellers on the GTAA project steering group.	Representatives from Save the Children, the Romani Cultural and Arts Company and Gypsies and Travellers Wales were invited to join the Steering Group but were unable to attend. Therefore a more targeted Focus Group was held with members of the Community to feed back into the Steering Group as per Welsh Government advice.
6.	Ensure contact details provided to the Local Authority by community members through the survey process are followed up and needs	All referrals for interviews were duly followed up.
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.	Contacts with existing members of the community and owners of private sites were utilised to spread the message that the Council wanted to pro-actively engage with Gypsies and Travellers. The Focus Group was also held at one site and participants were asked to promote the process amongst the community, as were all surveyed households.

The interviews themselves began in July 2015 and concluded in December 2015. This timescale was deemed long enough by the Steering Group and ensured that it covered both summer time, when many Gypsies and Travellers could be travelling frequently (both into and outside of Rhondda Cynon Taf), and also the winter months, when Gypsies and Travellers are typically less mobile.

Chapter Four: Survey Findings

In total, Council Officers attempted to engage with 30 households and 13 interviews were completed. The Guidance states, “it is intended for interviewers to complete the questionnaire itself during a face-to-face conversation with a member of each household” (WG, 2015a, para. 122) and this was facilitated in 12 out of 13 successful cases.

Successful engagement was often enabled through the use of a gatekeeper to the community. Specifically, the six households on the Council site were all willing to engage as prior appointments had been made via the Site Manager, who had previously developed a good rapport with the occupants. Another household had approached Welsh Government after seeing the advert in World’s Fair and was thus happy to undertake a survey when contacted by the Council and also encouraged a related household to take part. This household also provided contact details for a third Travelling Showperson family residing in a different part of Rhondda Cynon Taf, which nearly resulted in another survey being completed. Alas, the timing of the survey was not suitable for the household for personal reasons and it was thus not possible to interview this household. Nevertheless, use of relationships with members of the community was deemed to be a key means of engaging with Gypsies and Travellers by the Focus Group and these examples are testament to this advice.

Due to a lack of other gatekeepers, unarranged visits to sites known to the Council were conducted. Whilst this was not an engagement technique held in high esteem by the Focus Group, no other contact details were held. However, this approach did prove successful in three cases and three Travelling Showperson households were happy to complete surveys after the purpose of the GTAA was fully explained. To help remove potential obstacles, a combination of male and female interviewers approached the sites, adopting a smart-casual dress. It should however be noted that one of the households surveyed was offended by the term ‘Gypsy and Traveller Assessment’ as it was not felt that this broad categorisation was appropriate to represent the needs of Travelling Showpeople.

It was not possible to interview one of the households face-to-face as that household (residing on the unauthorised encampment) was travelling abroad at the time, with an unplanned return date. The household however offered to complete the survey electronically and emailed a form to the Council. Whilst this response is included in the forthcoming analysis of survey findings, some of the answers are limited and it was not possible to expand on the questions in a similar manner as it would have been face-to-face. This was unavoidable, yet regrettable, as this

particular household was more engaging with the Council and could have acted as a gatekeeper to engage with the remaining residents on the unauthorised encampment. As noted in the Interview Log (Table 2), an appointment made with another member of the same community was not honoured and subsequent efforts to engage with this site by telephone were not answered. It was thus impossible to identify accommodation needs of this community, especially given that caravan numbers have habitually fluctuated between 5 and 10.

Non-response to telephone calls, flyers and personal visits was a further obstacle as documented in Table 2 and this issue was duly discussed at the Steering Group. It was however felt that the Council had done everything it could to promote the Assessment and the Steering Group specifically warned against any action that would make the Council appear to be targeting families or 'forcing' them to engage. As the Focus Group also stressed, if households choose not to engage with the Council then that is their prerogative.

Finally, the only outright refusals received were on the two short term unauthorised encampments on different sites in Talbot Green. The one set of households simply had no desire to utilise an authorised site (even a transit site) and the other set stated they were not interested, and had no needs (including health, education and accommodation) to be met. The interview log in Table 2 further elaborates on the attempts made to engage with the Gypsy and Traveller population in Rhondda Cynon Taf. Analysis of the survey findings then follows.

Table 2: Interview Log

Address	Type of tenure	Interview attempts			Engagement techniques used	Questionnaire completed or refusal?	Reasons for refusal?
Magden Park, Talbot Green	Temporary Unauthorised Encampment	08/07/2015			Unarranged site visit (3 households)	Refusal	Occupiers were successfully engaged and the purpose of the survey was explained (including identifying need for transit sites). Occupiers stated that they did not wish to take part in the survey and that they had no interest in stopping on authorised sites as they only stop for short periods. They indicated that they would rather stop temporarily on any land they see fit for a day or two at a time.
Rhondda	Unauthorised Encampment	13/08/2015	14/09/2015	16/09/2015	Unarranged site visit Subsequent telephone calls (2 households engaged)	One survey completed electronically, unable to complete surveys with the other residents	An unarranged site visit took place on Wednesday 10 th August from 10.30AM-12.30PM. Community Safety Officers discussed potential issues the community may be facing and this led to the Council obtaining a contact number. An appointment was initially made for 17th August to engage with several of the Travellers. The point of contact called on the morning of the visit to cancel. Several follow-up calls were made, with no reply each time. One of the Travellers on the site was leaving to travel abroad indefinitely but emailed through a copy of the survey.
Taf Local Authority Site Plot 1	Local Authority site	11/09/2015			Pre-arranged appointment (1 household)	Completed	
Taf Local Authority Site Plot 2	Local Authority site	11/09/2015			Pre-arranged appointment (1 household)	Completed	
Taf Local Authority Site Plot 3	Local Authority site	11/09/2015	12/09/2015		Pre-arranged appointment, re-arranged (1 household)	Completed	
Taf Local Authority Site Plot 4	Local Authority site	11/09/2015			Pre-arranged appointment (1 household)	Completed	
Taf Local Authority Site Plot 5	Local Authority site	11/09/2015			Pre-arranged appointment (1 household)	Completed	
Taf Local Authority Site Plot 6	Local Authority site	11/09/2015			Pre-arranged appointment (1 household)	Completed	
Taf Mobile Homes	Private	23/09/2015	20/10/2015	04/11/2015	Appointment with owner of site	Unable to Complete	Held meeting with site owner to discuss whether any Gypsies or

Site	Authorised Site				and subsequent telephone calls (4 households)		Travellers were residing on the site. The owner said there were four Gypsy households currently living on site temporarily. However, the owner explained that the households would not be willing to meet on site with the Council and it would not be appropriate to approach unannounced. The owner offered to explain the process to the four household's on the Council's behalf and share leaflets / questionnaires. The residents did not want to engage despite chasing up a response two other times.
Taf Showperson Site (1) Plot 1	Private Authorised Site	08/10/2015			Unarranged site visit (1 household)	Completed	It should be noted that there was another occupied plot on this site, but the household was abroad indefinitely and unavailable to complete a separate survey.
Taf Showperson Site (2) Plot 1	Private Authorised Site	08/10/2015			Unarranged site visit (1 household)	Completed	
Taf Showperson Site (2) Plot 2	Private Authorised Site	08/10/2015			Unarranged site visit (1 household)	Completed	
Taf Showperson Site (2) Plot 3	Private Authorised Site	08/10/2015			Unarranged site visit (1 household)	Completed	
Taf	Private Authorised Site	08/10/2015	04/11/2015	18/11/2015	Unarranged site visit Attempt to reach by telephone Letter sent to site (2 households)	Unable to Complete	Unable to speak to residents. Interviewers were attacked by angry dogs on-site and had to leave due to personal safety. Later attempts to engage by telephone and letter were unsuccessful.
Lanelay Hall, Talbot Green	Temporary Unauthorised Encampment	19/10/2015			Unarranged site visit (4 households)	Refusal	Occupiers were engaged. All occupiers refused to take part, stating that they were not interested and had no needs (health, education and accommodation) to be met.
Taf	Bricks and Mortar	20/10/2015			Pre-arranged appointed (Via Welsh Government advert) (1 household)	Completed	
Taf	Bricks and Mortar	23/11/2015	24/11/2015	03/12/2015	Attempted telephone call Flyer sent to address	Unable to Complete	No response to all three attempts of communication

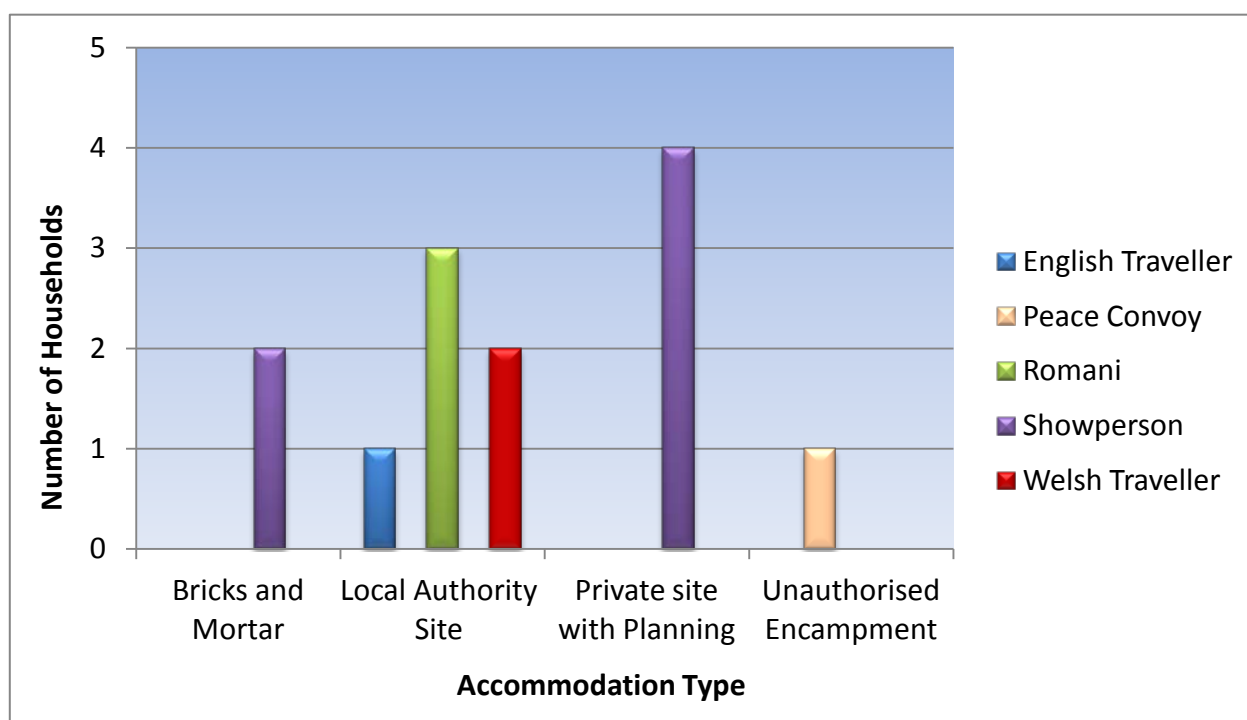
					Unarranged visit to property (1 household)		
Rhondda Valley	Bricks and Mortar	01/12/2015	02/12/2015	09/12/2015	Telephone calls to landline and mobile numbers, message left. Not possible to visit unannounced or send letters due to confidentiality reasons. (1 household)	Unable to Complete	Numerous calls to both landline and mobile numbers held. Message left but no response.
Cynon Valley	Private Authorised Site	04/12/2015	08/12/2015	09/12/2015	Telephone number sourced via another member of the community. Numerous successful telephone calls (1 household)	Refused at present	Spoke in depth to the resident and explained the reasons for the GTAA and benefits of taking part. The household initially agreed for an interview to take place on 9th December 2015, but cancelled the same day for personal reasons. The residents then indicated that they were unable to take part at the moment, but perhaps at a later date. The residents did however state briefly that their private site was large enough to accommodate the family's needs.
Taf	Bricks and Mortar	11/12/2015	14/12/2015		Telephone number sourced via another member of the family. Telephone conversation resulted in an appointment being made. (1 household)	Complete	

Number of Households by Type of Accommodation and Ethnicity

A number of different ethnicities were selected by the thirteen households taking part in the survey, meaning that there is a relatively varied Gypsy and Traveller Community residing within Rhondda Cynon Taf (Figure 4). There was no one predominant ethnicity recorded by the surveys; although residents of the Local Authority site and several Travelling Showpeople sites proved more willing to engage.

Nine out of the ten households residing on authorised pitches stated their reasons for living there were primarily due to local family and work connections. The other household placed more emphasis on their preference for caravans over houses. The two households residing in bricks and mortar felt that they had to move into such accommodation due to a lack of sites, although disclosed a preference for living in caravans. Finally, the household that had been living on the unauthorised encampment highlighted that this was only due to a lack of alternative authorised pitches.

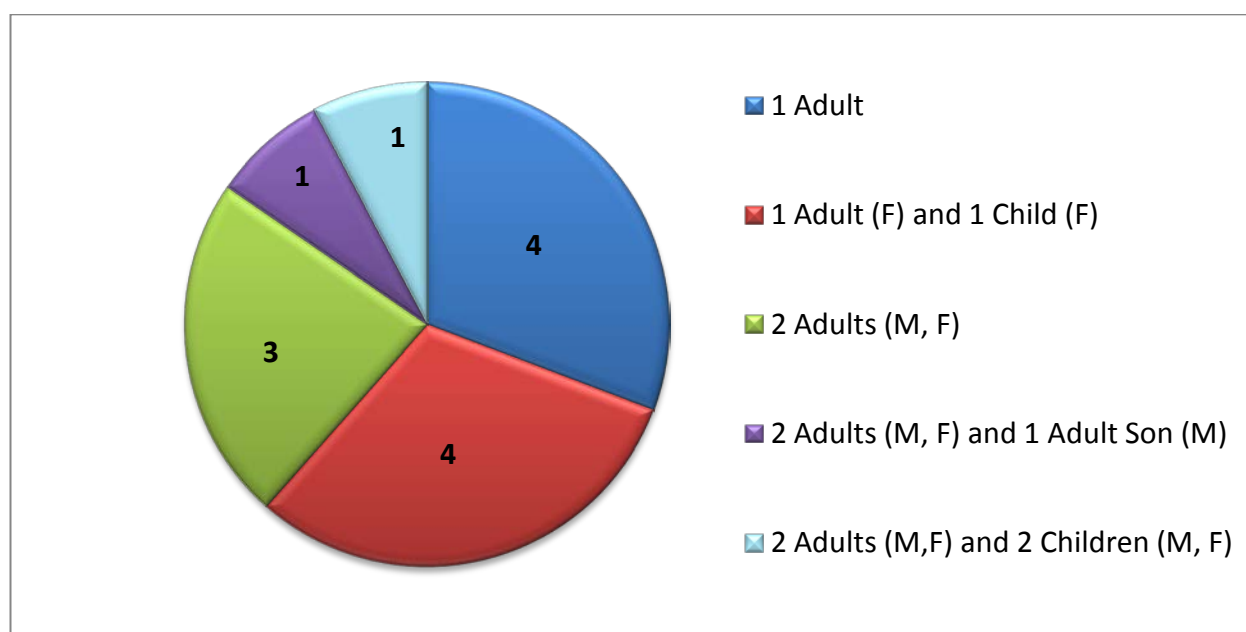
Figure 4 Household Ethnicity and Accommodation Type



Demographic Profile of Population

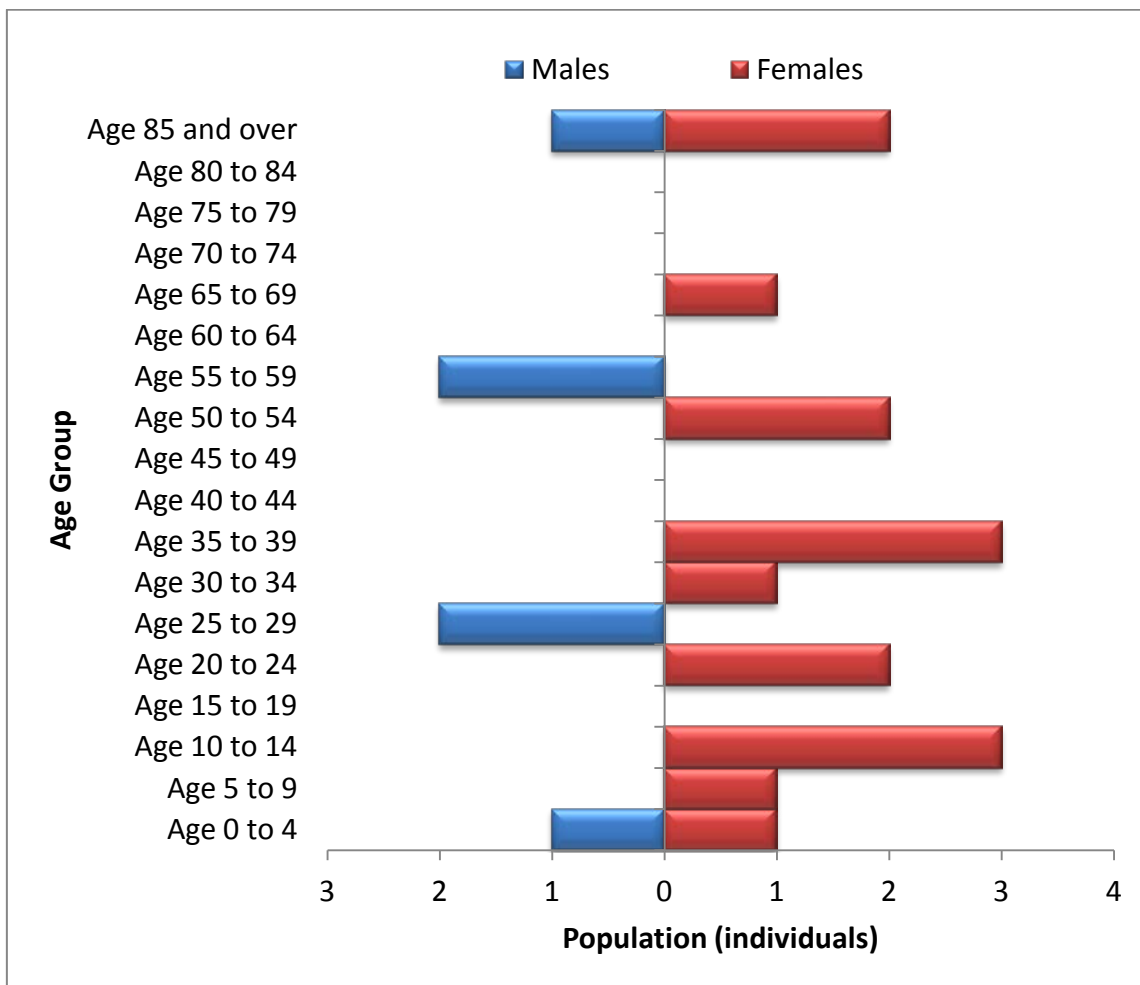
Household compositions were also varied, although 1 female adult with 1 dependent child and 1 single adult proved to be the most common household make up (4 households per category), closely followed by 2 adults with no children (3 households). The two remaining households comprised of two adults with a non dependent son and two adults with two children (Figure 5).

Figure 5 Household Composition



The population pyramid (Figure 6) further elaborates on the age groupings of the individuals residing within the surveyed households. Please note that Figure 6 excludes one individual (aged 50) who chose not to disclose their gender, although with this individual included, there are 23 individuals residing in the 13 surveyed households. This compares to a total of 53 individuals identifying themselves as 'Gypsy or Irish Traveller' on the Census, or 22 households. Whilst it should be re-emphasised that the Council attempted to engage with 30 households in total, it is unlikely that there is perfect correlation between the two datasets.

Figure 6 Population Pyramid of Individuals in Surveyed Households



For example, Figure 6 does show that a fair proportion of individuals (8 out of 23) fall within the 20 to 39 age bracket, which is broadly similar to the age make up of those individuals identified by the Census (Figure 2). However, Figure 6 also shows five individuals aged between 50 to 69 and three aged 85 and over. These older individuals are not evident from the Census data displayed in Figure 2.

Moreover, it is not wholly accurate to compare Figure 6 with Figure 2 in any case, as the latter Census data set excluded those individuals who had identified their ethnicity as 'Roma', whereas the former includes information from three households identifying themselves as 'Romani'. Indeed, the Welsh Government definition is more inclusive than the Census definition in this respect and this GTAA has thus included all individuals meeting the aforementioned definition of Gypsies and Travellers.

Suitability of Current Accommodation and Overcrowding

Satisfaction rates were generally high amongst survey respondents, with nine out of thirteen households stating that they were satisfied with their current accommodation. Each of these nine households did not express a desire to move, which is also testament to this phenomenon. The four households that stated 'no' provided three varied reasons; the first felt that there were a lot of pot holes near the (private) site entrance that needed repairing, the second and third felt the need to move into a house due to a lack of sites for Travelling Showpeople and the fourth lived on an unauthorised encampment and desired a permanent site (NB this latter household has since moved off the unauthorised encampment indefinitely and no other households from that site took part in the survey). Furthermore, whilst two Travelling Showperson households were happy with their current private site, they cited concerns that they could soon be evicted by the freeholder and thus felt anxious that they may lose their home.

Whilst satisfaction on the Local Authority Site itself was high overall, one resident did highlight that the utility block was cold in winter and would welcome additional heating. Following consultation with residents and corporate maintenance, installation of a central heating type system was not deemed feasible due to the absence of a gas supply to the site. The Council is however hoping to secure funding to install a panel heater to replace the existing fan heater system, and thus, this issue is already being addressed.

Every respondent living in a caravan indicated there were enough sleeping areas for all residents, and, interestingly, four sleeping areas could be added to each pitch surveyed if required. Overcrowding amongst the respondents was thus not a perceptible issue, although this obviously excludes the unauthorised encampment as there are no defined pitches and it was not possible to identify household need.

Accommodation Aspirations

Six out of the thirteen households did express a desire for a new site, as will now be discussed in turn.

Household One and Two

The first two of these households had previously lived on authorised private sites owned by third parties within Rhondda Cynon Taf. Both households had recently purchased a house, although only because there was a lack of alternative private Showperson sites with planning permission available. The respondents felt uncomfortable living on other people's land, yet equally felt that bricks and mortar accommodation was prohibitive to their traditions and heritage. Both

households were clear that they were not satisfied with their current accommodation, preferred to reside within caravans instead of houses and expressed the desire to move at some point in the future. Moreover, both households' fair equipment and lorries etc were being stored on numerous rented sites and this was perceived as an issue by both households.

It is thus possible that both households are experiencing cultural aversion, 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" (WG, 2015a, para 173). However, Welsh Government Guidance suggests that it is not appropriate to require interviewees to demonstrate this aversion (i.e. through medical or psychiatric assessment) during the GTAA itself. More in-depth assessments of an individual's cultural aversion are required as part of the Authority's homelessness or pitch allocation policies as opposed to the broader estimate of likely overall pitch need provided by this GTAA.

The Local Authority's responsibilities are also made clear in this respect;

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 (WG, 2015a, para. 175).

With these considerations in mind, it is felt that both households could be experiencing cultural aversion based on the circumstances summarised above. Whilst both cases would need to be examined in more detail, there is some relevant case law regarding cultural aversion, which would need to be taken into account.

One landmark case was *Clarke v Secretary of State for the Environment, Transport and the Regions, Tunbridge Wells Borough Council* [2001] EWHC 800 (Admin). Both the High Court and then the Court of Appeal quashed a planning inspector's decision to refuse planning permission for caravans on a Gypsy's land. The Inspector was judged to have breached Articles 8 and 14 of the European Convention on Human Rights by taking into account an offer of conventional housing that had been made when the family could demonstrate that they had

lived a traditional Gypsy lifestyle and had “an aversion to bricks and mortar”. The appeal was reconsidered and planning permission was granted for the family to continue living in their caravans on their land.

In *R (Margaret Price) v Carmarthenshire County Council* ([2003] EWHC 42 (Admin)), Mrs Price had made a homelessness application to the local authority since she had no lawful place to pitch her caravans. The local authority offered Mrs Price a house, whilst seeking her family’s eviction from their encampment on local authority land, which, hitherto, had been tolerated. The local authority evidenced the fact that Mrs Price has previously indicated a willingness to live in conventional housing in 2001 as a sufficient reason for disregarding her Gypsy way of life. The judge examined the way in which the local authority had dealt with the issue of Mrs Price’s ‘cultural aversion to conventional housing’. The judge found that the local authority’s approach had been flawed because it had placed too much weight on the fact that she had seemingly been prepared to give up her traditional way of life to live in conventional housing in 2001, and, it had used this fact as sufficient reason for totally disregarding her ‘aversion to bricks and mortar’ when considering whether the offer of conventional housing would be ‘suitable’ in her case. The judge quashed the decision to evict, stating that, “In order to meet the requirements and accord respect, something more than ‘taking account’ of an applicant’s gypsy culture is required”.

Nevertheless, the facts of the *Wingrove and Brown v Secretary of State for Communities and Local Government and Mendip DC* [2009] EWHC 1476 (Admin) case demonstrate that it is permissible for a decision maker to conclude that there is no cultural tradition of nomadism or aversion to bricks and mortar if the facts support such a conclusion in a particular case.

Locally, the two households in question have both indicated that they have the financial means to purchase a joint site to accommodate two pitches with storage for fair equipment. The one household in particular was also unsure whether they would feel comfortable living on an authorised pitch managed by the Council. Correspondingly, in *South Cambridgeshire District Council v Secretary of State for Communities and Local Government* [2008] EWCA Civ 1010, the Court of Appeal confirmed that there is no burden of proof on the applicant to prove the lack of alternative sites for the stationing of caravans. Ultimately, it is a matter for the planning authority to determine what are material considerations and to give each of them such weight as considered appropriate. It could thus be appropriate for this need to be met via the criteria based Policy AW 15.

Households Three, Four and Five

The third, fourth and fifth households having expressed a desire for a new site are Travelling Showpeople currently living on the same authorised site. Whilst this has been a longstanding arrangement, all three households had been told by the freeholder that the site is due to be sold at some point in the future and that they will have to leave. However, the fundamental consideration is the fact that no formal eviction notice has been served on any of these households. Therefore, whilst these households may need a new site at some point in the future, the imminent need was not apparent at the point of conducting this GTAA. The three households indicated they may have the financial means to purchase their own site, although may need some form of assistance from the Council. Similarly to the previous two cases, therefore, it could be equally appropriate for this need to be met via the criteria based Policy AW 15, although a more thorough assessment of need could identify the requirement for a Local Authority Site.

Household Six

The sixth household requesting a new site lived on the unauthorised encampment in the Rhondda. As aforementioned, this household was unavailable to complete the survey face to face and instead chose to email a copy to the Council prior to leaving the site to travel abroad. The household requested “an undeveloped site, with no shower block, no electricity and no tarmac”, further elaborating that “a gate and a field/quarry will do”. This household had also made a homelessness application to the Council, although this application is no longer live. The Council is not privy to when or if this household may return to Rhondda Cynon Taf and no other households on the site were willing to engage as part of this GTAA. This is further complicated by the fact that a varying number of caravans have been stationed on the encampment; between four and ten at any one time. Given all of these considerations, it is impossible to identify the extent of accommodation need on the site.

Findings from a Neighbouring Authority

Throughout the course of this GTAA, the Council has maintained close dialogue with neighbouring local authorities. Indeed, as Welsh Government Guidance states,

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 (WG, 2015a, para. 166).

One such case has been brought to the Council's attention. A household identifying as a Gypsy is currently residing on a caravan site within Caerphilly. This household does reportedly have links to Rhondda Cynon Taf, although Caerphilly County Borough Council's GTAA has deemed this household to be adequately accommodated at present. This household is thus not considered to be in accommodation need currently and the desire to reside within Rhondda Cynon Taf is considered to be a preference rather than a need. This household has nonetheless been duly contacted to join the waiting list for Council pitches.

Household Growth

None of the interviewees specifically indicated that people within existing households are likely to want to move to their own home in the next five years. There is thus no immediately apparent household growth based on the twelve surveys conducted. Indeed, there were no instances of young adults still living in households with their parents and three of the households surveyed were also in their young twenties, so have recently formed new households in any case. Where children were present in households, they were either very young or too young to start thinking about forming their own households. For example, there were two thirteen year old girls and one 12 year old girl living in households with their mothers, although their parents did not feel that they would form new households within the next five years. There is nonetheless scope for some of these individuals to potentially form new households towards the latter part of this GTAA period, although it may be that their need becomes more apparent in the subsequent GTAA for Rhondda Cynon Taf.

An estimate of household growth does however need to be made. Welsh Government advise,

“data compiled by those undertaking previous Gypsy and Traveller accommodation assessments suggests... [the] growth rate is usually within the range of 1.5 – 3% per annum” (WG, 2015a, para. 203). However, it is also deemed important to ensure “needs are not excessively under- or over- estimated” (WG, 2015a, para. 204).

If one was to assume that the two individuals due to reach 18 during the course of this GTAA will form new households within the next five years **and** there were no deaths amongst the other existing households surveyed, the number of households would increase from 13 to 15. This would represent a percentage growth rate of 15% in five years, or 3% per annum (compound growth). Whilst this is based on a relatively small sample size, it does fall within the higher parameter of the expected growth rate and thus can be used as a logical estimate of household growth.

Chapter Five: Assessing Accommodation Needs

Calculating Overall Residential Need

There is currently one Local Authority site in Rhondda Cynon Taf, comprising six residential pitches for social rent. The remaining residential supply stems from 4 authorised private sites, with 15 pitches between them. Two of the sites have planning permission and the other two have been in existence for a significant enough time to be immune from planning enforcement action. The total number of authorised pitches within Rhondda Cynon Taf thus totals twenty one. Nonetheless, the private sites are owned and occupied by certain families. Therefore, any vacant pitches arising on these sites should not necessarily be deemed capable of meeting generic need for pitches in Rhondda Cynon Taf, although it is known that one site owner in particular has allowed third parties to rent pitches. It should also be noted that this total excludes the one unauthorised site, which houses a fluctuating number of caravans, as no assurances have been provided to the residents that the site will be immune from planning enforcement action. Welsh Government Guidance is clear that sites meeting this criterion should not be included within current residential supply. Furthermore, as the current residents of this site chose not to participate in this GTAA, it is impossible to determine their accommodation needs.

There are no new sites (Local Authority or private) due to come forward within the next five years. Three pitches have become available on the Council site since refurbishment was completed in 2012 and all three were re-let via the Common Housing Register. At the time of writing this GTAA, there were no households having identified themselves as 'Gypsy, Romany or Irish Traveller' waiting for a caravan pitch on the Common Housing Register. There was however one waiting for bricks and mortar accommodation and specifically not a caravan pitch. As aforementioned, attempts to engage this household were unsuccessful.

Table 3 attempts to estimate the need for residential site pitches over the 5 year period of the GTAA and the existing Local Development Plan period (up until 2021). However, given the nature and status of certain sites together with the varying backgrounds of certain households, this calculation is not particularly helpful as will be further elaborated on.

Table 3: An Estimate of Need for Residential Site Pitches

Current residential supply	Number of pitches
A. Occupied Local Authority pitches	6
B. Occupied authorised private pitches	11
Total	17

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)	1
E. New Local Authority and private pitches with planning permission	0
Total	1

Current residential demand	Pitch demand
F. Unauthorised encampments	0
G. Unauthorised development	0
H. Overcrowded pitches (see note 2)	0
I. Conventional housing (see note 3)	2
J. New households to arrive (see note 4)	0
Total	2

Current households (see note 7)	Future households (at year 5)	Future households (Plan period)
K. $17 + 2 - 1 = 18$	21	21
L. Additional household pitch need	3	3

Unmet Need	Need arising	Need accommodated
M. Current residential demand	2	
N. Future residential demand (5 year)	3	
O. Future residential demand (plan period)	3	
P. Planned residential supply		1
Q. Unmet need (5 year)		4
R. Unmet need (Plan period)		4

Firstly, the three households that feel they may be evicted from this aforementioned site have not been included in the current residential demand figures as they have not formally been served with eviction notices. These households could potentially meet their needs through purchasing a site and seeking planning permission through the criteria based policy in the Local Development Plan. Otherwise, these households would be subject to a financial viability assessment to determine if they were in need of public site provision upon being served an eviction notice.

Secondly, the two households in conventional housing (part I) could be experiencing cultural aversion, which would need to be investigated further. However, both of these households wish to purchase a private site in any case and thus could meet their needs through the criteria based policy in the Local Development Plan.

Thirdly, the household currently adequately accommodated in Caerphilly has also been excluded from these calculations, although has been contacted to join the waiting list for a Council pitch to cater for preferences as opposed to need.

Therefore, whilst this quantitative calculation is required as per the guidance, it is of little use in properly estimating the need for pitches. Indeed, this is better evidenced through analysis of the qualitative data. Specifically, it is felt that the two potential newly forming households on the Council site can be accommodated within their existing respective plots as there is space on each for an additional caravan. Any other growth based on the 3% figure amongst this community could then potentially be accommodated through turnover within the next five years as past trends have shown.

Transit Unmet Needs

Caravan count data and local records do not show a significant preponderance of caravans on unauthorised encampments within Rhondda Cynon Taf. Notwithstanding the aforementioned unauthorised encampment in the Rhondda, there are only a few instances of short term encampments scattered around the County Borough as detailed within Table 4.

Table 4: Recent Unauthorised Encampments in Rhondda Cynon Taf

Location	Area	Arrival	Number of Caravans
Navigation Park	Abercynon	June 2013	7
Baglan Field	Treherbert	July 2013	2
Michael Sorbel Centre	Aberdare	July 2013	3
Magden Park	Talbot Green	July 2015	3
Laenlay Hall	Talbot Green	October 2015	4

As previously discussed, none of these encampments remained in situ for more than several days and the occupants that did engage indicated that they would not utilise an official transit site or stopping place even if one was available. As Welsh Government guidance states, “some encampments do also occur without a desire for permanent or long transit stays in the area” (WG, 2015a, para. 209). Irrespective of this phenomenon, there are numerous powers available to respond to unauthorised camping and to move such occupants on to transit sites or temporary stopping places. Sections 61 and 62 of the Criminal Justice and Public Order Act 1994 confer powers on the police to remove any trespasser and vehicle from land and Sections 62A – E provide further powers for the police in relation to trespassers. Furthermore, Section 77 of the Criminal Justice and Public Order Act 1994 gives local authorities the power to direct persons to leave land and remove any vehicles or property.

Nonetheless, the short term unauthorised encampments recorded in Table 4 have literally only lasted for several days. Therefore, by the time any of these powers would have been invoked, the occupiers would have moved on anyway. In accordance with the Managing Unauthorised Camping guidance, therefore, the Council tolerates unauthorised encampments where a site visit reveals the residents’ intentions are to stay for a **very short period of time**, such as if they are en route to another destination. Given the minor number of unlawful encampments and their duration, there is thus insufficient local evidence to justify provision of a transit site or temporary stopping place within Rhondda Cynon Taf at present, although this situation will be duly monitored, both locally and regionally.

Chapter Six: Conclusion and Next Steps

This GTAA has analysed a range of secondary and primary data sources to assess the needs of the Gypsy and Traveller Community in Rhondda Cynon Taf. Existing sources of information such as the caravan count, Census records and data held by a range of local stakeholders was firstly synthesised and scrutinised. A variety of preparatory engagement activities were then undertaken in preparation for the primary data surveys taking place. In total, Council Officers attempted to engage with 30 households and 13 interviews were completed.

Analysis of this primary data revealed a range of potential accommodation needs. Firstly, two households currently living in bricks and mortar may have a cultural aversion to living in housing and have indicated the desire to purchase a joint Travelling Showperson Site. It is felt that this could be facilitated through the criteria based Policy AW 15 and these households have been contacted and referred to the Planning Department to discuss site suitability with a view to meeting both households' needs. This would account for two of the households in the unmet need category of Table 3.

Three households currently living on a private site may be subject to eviction at some point in the future, although they are not currently deemed to be in need of accommodation. These households have indicated that they may be able to purchase a site, although may not have sufficient finance available. It could therefore equally be possible for the households to purchase and operate a site via Policy AW 15, although a financial viability assessment would be required. Contact details are held for the households concerned and they will be contacted again following completion of this GTAA to ascertain their current status and determine if they have security of tenure. If these conversations reveal that the households have been served notice, a financial viability assessment will be conducted to determine if a site needs to be provided or facilitated through Planning.

Two individuals could form new households on the Council site over the course of this GTAA period, although both existing pitches have sufficient space to accommodate a caravan and provision of new pitches for these households is not therefore deemed necessary. It is thus felt that the remaining potential growth in households documented within Table 3 can be met through these means if these projections do indeed become a reality. One other household currently adequately housed in Caerphilly also has a preference to live on this site and has therefore been invited to join the waiting list.

Finally, as the current occupants of the unauthorised encampment in the Rhondda chose not to engage with the Council, it is impossible to identify accommodation needs through this GTAA. Periodic site visits will nevertheless still be conducted to ascertain whether the community is growing and if any future accommodation needs become apparent.

Furthermore, the need for both a transit site and temporary stopping place has been duly considered as part of this Assessment. However, the local evidence has not indicated need for either for two principal reasons. Firstly, with the exception of the one long term encampment in the Rhondda (that did not engage with the Council) there were only a minor number of short term unlawful encampments recorded in recent years. These encampments were so short term in nature that by the time the Council would have attempted to move them on, they would have left anyway. Secondly, in accordance with the Managing Unauthorised Camping guidance, the Council tolerates unauthorised encampments where a site visit reveals the residents' intentions are to stay for a very short period of time (such as if they are en route to another destination). There is thus insufficient local evidence to justify provision of a transit site or temporary stopping place within Rhondda Cynon Taf at present, although this situation will be duly monitored locally and regionally. All instances will be recorded by the Council and if it becomes apparent that a growing number of unlawful encampments are settling within Rhondda Cynon Taf for periods exceeding several days at a time, then this position will be re-visited.

Appendix 1



Your Home Your Say

Gypsy and Traveller Accommodation Needs Assessment

- Rhondda Cynon Taf Council is looking into the living needs of Gypsies and Travellers.
- If you are a Gypsy or Traveller living in Rhondda Cynon Taf we would like to hear from you.
- We need to hear your views so that we can make sure we understand your living needs.
- **The information from the interviews will be private. No one will be able to trace any answer back to you.**



If you would like to take part:

 **01443 425678**  **Fill in a questionnaire on www.rctcbc.gov.uk**

 **housingstrategy@rctcbc.gov.uk**



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TRIFFADAMITH GADARN | DYFODOL HEIC

Eich cartref Eich barn

Asesu Anghenion Llety ar gyfer Sipsiwn a Theithwyr

- Mae Cyngor Rhondda Cynon Taf yn ystyried anghenion byw Sipsiwn a Theithwyr.
- Os ydych chi'n Sipsi neu'n Deithiwr yn byw yn Rhondda Cynon Taf, rhowch wybod i ni.
- Mae angen inni glywed eich barn er mwyn inni ddeall eich anghenion byw.
- Bydd yr wybodaeth o'r cyfweiliadau yn breifat.
Fydd neb yn gallu olrhain o ble ddaeth yr atebion.



Os hoffech chi gyfrannu:



01443 425678



Llenwch holiadur yn www.rctcbc.gov.uk



strategaethdai@rctcbc.gov.uk



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TRIFFATH GADARN | DYFODOL ICE

Appendix 2

Glossary: Definitions of Key Terms Used in this Assessment

Gypsies and Travellers	<p>(a) Persons of a nomadic habit of life, whatever their race or origin, including:</p> <ol style="list-style-type: none">(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(2) Members of an organized group of travelling show people or circus people (whether or not travelling together as such); and <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>

Temporary Stopping Place	<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>
Residential pitch	<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>
Transit pitch	<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>
Unauthorised encampment	<p>Land occupied without the permission of the owner or without the correct land use planning permission.</p> <p>Encampments may be tolerated by the Local Authority, whilst alternative sites are developed.</p>
Unauthorised development	<p>Land occupied by the owner without the necessary land use planning permission.</p>
Current residential supply	<p>The number of authorised pitches which are available and occupied within the Local Authority or partnership area.</p> <p>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>
<p>Overall residential pitch need</p>	<p>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.</p>
<p>Planned residential pitch supply</p>	<p>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.</p>
<p>Household</p>	<p>In this guidance this refers to individuals from the same family who live together on a single pitch / house / encampment.</p>
<p>Concealed or ‘doubled- up’ household</p>	<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.

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