



Cyngor Castell-nedd Port Talbot  
Neath Port Talbot Council

## **NEATH PORT TALBOT COUNCIL**

### **CABINET**

9<sup>th</sup> February 2022

#### **Joint Report of the Head of Planning and Public Protection and Head of Adult Services**

Ceri Morris / Angela Thomas

#### **Matter for Decision**

**Wards Affected:** All Wards

#### **Housing (Wales) Act 2014 – Consideration of: the Neath Port Talbot Gypsy and Traveller Accommodation Assessment (GTAA) (2022)**

#### **Purpose of the Report**

To agree the findings of the Gypsy and Traveller Accommodation Assessment (GTAA) (2022) and authorise the submission of the GTAA Report to the Welsh Ministers for approval.

#### **Executive Summary**

Part 3 of the Housing (Wales) Act 2014 places a duty on all Local Authorities in Wales to undertake a new GTAA every 5 years, and where the assessment identifies an unmet need for mobile home pitches it must make provision for the identified need.

The Authority's most recent GTAA Study (2016) was produced in-house by officers from Planning Policy, Estates and Housing Strategy working collaboratively. This previous study identified that there was no need for additional pitches for the 5 year period (2016-2021) due to the supply of 11 new pitches at Cae Garw. In addition, there were 2 re-commissioned pitches in Briton Ferry. Combined, this meant that there was an oversupply of 3 pitches for 2016-2021 and that a further 4 pitches would be needed towards the end of the Local Development Plan (LDP) period (2022-2026).

Following WG guidance '*Undertaking Gypsy and Traveller Accommodation Assessments*' the new GTAA has again been undertaken collaboratively in-house. The Study, to be submitted to Welsh Ministers by 24<sup>th</sup> February 2022, has identified that there is no need for pitches in the next 5 years (2021-2026) and a need for an additional 10 pitches in the longer term (2027-2036).

This report seeks endorsement of the GTAA (2022) Study and authorisation to submit the report to Welsh Ministers for approval.

## **Background**

NPT has a well-established gypsy community with 67 pitches across three authorised public sites: two sites located at Wharf Road, Briton Ferry with a further site at Cae Garw, near Margam. The Council manages all three sites.

The previous GTAA Study (2016) covered a 15-year period to 2026. Whilst the study identified no need for transit pitches, private residential pitches or pitches for travelling show people, it was estimated that a further 4 additional pitches would be required on public residential sites towards the end of the LDP period.

The new GTAA should have been completed in 2020 and submitted to Welsh Government (WG) early in 2021. However, due to the Covid pandemic and associated restrictions, Local Authorities were unable to undertake the necessary data collection by face-to-face interview and in this context, the WG granted a one year extension to carry out the Assessment and confirmed the deadline for the submission of GTAA reports as 24<sup>th</sup> February 2022.

The findings of the new study, which once approved by WG, will supersede the need identified within the previous study and the Authority will have a duty under Section 103 of the Housing (Wales) Act to meet the required need.

## **Methodology**

Following WG guidance '*Undertaking Gypsy and Traveller Accommodation Assessments*', work on the new GTAA began in 2020. The Study has been a collaboration between Planning Policy, Estates, Social Services, Vulnerable Learner Service and Local Area Coordinator who all contributed to collecting the primary data through interviews and questionnaires. The primary survey was undertaken in late summer 2021.

The GTAA methodology comprised the following three main components:

1. *Analysis of Existing Data Sources* – Census 2011 / LA Housing & Planning records / Caravan Count / Vulnerable Learner Service data and Health Board Information;

2. *Conducting a Specialist Survey* – i.e. through face-to-face interviews using census-style questionnaires with households living on existing residential sites and those in Bricks and Mortar Accommodation. No unauthorised encampments existed during the survey period but records were kept from such events as to when and why they occurred; and
3. *Assessment of Accommodation Needs* – data obtained from the questionnaires / site management records / waiting lists and caravan count have been used within the calculation. The calculation analysed the current and planned residential supply and current and future residential demand (which incorporates an anticipated future household growth). From this data, the unmet need for residential and transit pitches over the next 5 years (up to 2026) and over the plan period (up to 2036) has been calculated.

The study assessed the accommodation needs for public residential pitches, private residential pitches, transit pitches and pitches for Travelling Showpeople. A total of 65 interviews were completed: 53 from those households living on the three existing Council run sites (Wharf Road, Briton Ferry and Cae Garw Farm, Margam) achieving a 82% response rate; and 12 from households living in 'Bricks and Mortar' accommodation (out of a total of 15).

## **GTAA (2022) – Study Findings**

The new GTAA is presented in full in **Appendix 1**. The following summarises the key findings – further detail setting out the methodology used to calculate the need and the annual household growth rate applied is set out within Chapter 5 'Assessing Accommodation Needs':

- **Public Residential Pitches** – the Study identified a total need for 0 pitches over the next 5 years (2021-2026); and a need for 10 pitches was identified for the subsequent 10 years (2027-2036).
- **Private Residential Pitches** – the study did not identify a need for any private residential pitches.
- **Transit Sites** – from reviewing the responses from the survey findings and the absence of any need identified for NPT by neighbouring Local Authorities, there is no clear evidence to accurately support or justify development of a permanent transit site.
- **Travelling Showpeople** – contact was made with the 'Showman's Guild' to explain the assessment and how it may relate to Travelling Showpeople.

The Guild had also been contacted by other authorities with Guild members completing interviews in areas where they currently reside. The Guild advised that their members did not wish to complete individual interviews with NPT – as Guild members do not regularly reside in or resort to NPT, and in the absence of any completed questionnaires, no need has been identified through the GTAA process.

## **Implications for the Development Plan**

Members will be aware that ‘Future Wales – The National Plan (2040)’ now forms part of the statutory Development Plan for Neath Port Talbot. Policy 19 ‘Strategic Policies for Regional Planning’ stipulates that Strategic Development Plans (SDPs) should establish for the region (*amongst other things*) the gypsy and traveller need – the responsibility for preparing the SDP for the region will fall to the Corporate Joint Committee (CJC).

Predicting need in the longer term is unreliable, hence there is a requirement to update GTAAs every 5 years. The longer term need will therefore need to be confirmed by the next GTAA (due in 2027) – this will be undertaken on a regional basis and it will be for the SDP to set out how that need will be met across the region.

Following the establishment of the CJC, it is anticipated that work on the SDP will formerly commence in summer 2022, taking a minimum of 5-6 years to complete. Given the Replacement LDP will be adopted well in advance of the SDP coming forward, there will be a need for the Council to consider its options on how to address the findings of this new GTAA. Notably, there will be an expectation by WG that the LDP, through a policy/allocation, will meet the identified need.

The current LDP (2011–2026) contains three policies relating to Gypsies and Travellers: Strategic Policy SP 9 Gypsies and Travellers; Policy GT1 Gypsy and Traveller Site (which allocated land at Cae Garw, Margam); and Policy GT2 Proposals for New Gypsy and Traveller Sites (a criteria based policy to assess future applications for new sites). This policy framework will need to be reviewed and amended where appropriate to reflect the new GTAA.

The GTAA forms part of the evidence base that will be subject to public scrutiny through the Plan preparation process. Ultimately, it will be a matter for the appointed Inspector to examine the suitability and ‘soundness’ of the policy framework presented in the Development Plan (i.e. both LDP and SDP).

## **Financial Impacts**

The costs associated with preparing the GTAA have been met from existing budgets. The findings of the GTAA however mean that there will be financial implications in the future, in terms of implementing additional pitch provision to meet the identified need.

## **Integrated Impact Assessment**

A first stage impact assessment has been undertaken to assist the Council in discharging its legislative duties (under the Equality Act 2010, the Welsh Language Standards (No.1) Regulations 2015, the Well-being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016.

The first stage assessment (presented in Appendix 2) has indicated that a more in-depth assessment is not required. A summary is provided below:

- **Equalities** – the GTAA 2022 is part of a process intended to meet the needs of a minority group, Gypsies and Travellers. Due regard has been paid to equalities issues and the protected characteristics of Gypsies & Travellers from the start and throughout its preparation.
- **Welsh Language** – the GTAA 2022 has been prepared in accordance with the Welsh Language Standards (No. 1) Regulations 2015.
- **Biodiversity** – in itself, the GTAA 2022 will not affect biodiversity.
- **Well-being of Future Generation (5 ways of Working)** – all five ways of working have been embraced during the preparation of the GTAA 2022. The document makes a positive contribution towards meeting the Council's well-being objectives. A range of relevant stakeholders were involved in its preparation.

## **Socio-Economic Duty**

The Council is required by law to submit a GTAA to Welsh Government by the 24<sup>th</sup> February 2022, therefore whilst this report and associated documents do not directly involve a strategic decision, the socio-economic duty has been taken into account in the preparation of the GTAA.

Evidence received through a survey and data gathering has been reflected in the calculations and conclusions of the GTAA and the impact of the GTAA findings have been considered in this report. The views and needs of Gypsy and Travellers residing in Neath Port Talbot were taken into account during the preparation of the GTAA, which seeks to confirm their future accommodation needs.

## **Valleys Communities Impacts**

No implications.

## **Workforce Impacts**

No implications.

## **Legal Impacts**

The report addresses Part 3 of the Housing (Wales) Act 2014, which places a duty on all Local Authorities in Wales to undertake a new GTAA every 5 years and where the assessment identifies an unmet need for mobile home pitches it must make provision for the identified need.

The Gypsy and Traveller provisions of the Act came into effect on 25<sup>th</sup> February 2015. Sections 103 and 104 requiring LAs to address unmet needs identified in the GTAAs and the Welsh Ministers' direction making powers that could be used if a LA has failed to comply with its duty under this Part.

## **Risk Management Impacts**

The Council will be in breach of its legal requirement to undertake a GTAA and submit to the Welsh Government by 24<sup>th</sup> February 2022 should there be a failure to implement the proposed recommendations.

## **Consultation**

The GTAA 2022 has been prepared in consultation with relevant stakeholders and the Gypsy & Traveller Steering Group and its final form reflects the outcome of that process. There is no requirement to undertake a formal or full public consultation on the draft GTAA 2022.

## **Recommendation**

That having considered the report and having due regard to the Integrated Impact Assessment, it is resolved to make the following recommendations for approval:

1. The GTAA (2022) methodology and findings as set out in Appendix 1 be agreed; and
2. That authorisation is given to submit the GTAA (2022) to the Welsh Ministers for approval.

## **Reasons for Proposed Decision**

The recommendations are needed to ensure compliance with Section 103 of the Housing (Wales) Act 2014; the Mobile Homes (Wales) Act 2013; the Well-being of Future Generations (Wales) Act (2015); the Equality Act (2010); and Planning Policy Wales 11 (2021).

## **Implementation of Decision**

The decision is proposed for implementation after the three day call in period.

## **Appendices**

Appendix 1 – Gypsy Traveller Accommodation Assessment (2022)

Appendix 2 – First Stage Integrated Impact Assessment

## **List of Background Papers**

### ***Legislation and Regulations:***

Planning and Compulsory Purchase Act 2004 (Section 63).

Town & Country Planning (LDP) (Wales) (Amendment) Regulations (2015).

Well-being of Future Generations (Wales) Act 2015 (Section 4).

The Equality Act (2010).

Housing (Wales) Act 2014.

Mobile Homes (Wales) Act 2013.

### ***Planning Policy / Guidance:***

Future Wales – The National Plan 2040.

Neath Port Talbot LDP (2011-2026) (January 2016).

Planning Policy Wales Edition 11 (2021).

Circular 005/2018 Planning for Gypsy, Traveller and Showpeople Sites (2018).

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## **APPENDIX 1**

Gypsy and Traveller Accommodation Assessment  
(GTAA) (2022)





# Gypsy & Traveller Accommodation Assessment (2022)

Submission Date:

Publication Date:

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## Executive Summary

**1.0.1** Part 3 of the Housing (Wales) Act 2014 places a duty on all Local Housing Authorities in Wales to undertake a new Gypsy and Traveller Accommodation Assessment (GTAA) every 5 years. Where the assessment identifies an unmet need for mobile home pitches it must make provision for the identified need.

**1.0.2** Following the findings of the 2012 GTAA the Local Development Plan (LDP) for the County Borough made further provisions for an extra 11 pitches at the existing Cae Garw site near Margam to accommodate the identified short to medium term need of 4 pitches for the period 2012 – 2017 and 7 pitches for the period 2018 – 2022. Due to the statistical inaccuracies associated with predicting the longer term needs of the Gypsy and Traveller community, who by their very nature have nomadic lifestyles, it was the Council's view that the remaining need for 9 pitches would be reviewed as part of the LDP's Monitoring Framework and addressed by the Plan's Annual Monitoring Report (AMR) – this was subsequently endorsed by the Inspector in their binding report.

**1.0.3** The most recent GTAA for Neath Port Talbot (NPT) was produced in-house by the Authority's Housing Strategy and Planning Policy Sections in 2016 using the Welsh Government Guidance "Undertaking Gypsy and Traveller Accommodation Assessments" (May 2015). The study identified no need in the short term relating to 2016 - 2021 (there was in fact an oversupply of 3 pitches) with 4 pitches required on public residential sites towards the end of the LDP period (2022-2026). This need takes into account the increase in supply of 13 pitches (11 built at Cae Garw and 2 brought back into use at Wharf Road).

**1.0.4** The 2016 GTAA Study findings were incorporated into the LDP's Annual Monitoring Report (AMR) process. The full list of relevant indicators were monitored throughout the AMR process from 2016/17 financial year and reported to the Welsh Government (WG) by 31 October 2017 and each year after (up to and including 2021). The Authority considers the findings of each AMR and triggered a review of the LDP in the 2019 AMR. A review report published in July 2020 concluded that a full review of the LDP was required.

**1.0.5** Due to the Covid-19 crisis, authorities across Wales were unable to carry out a survey in 2020. Welsh Government recognised this and gave all authorities in Wales an extension of 1 year to publish the next Gypsy and Traveller Accommodation Assessment (February 2022). This was simply down to the fact that the best survey method is by way of face to face interviews and the safety of householders and their families and the survey takers is paramount.

**1.0.6** The survey in Neath Port Talbot was eventually conducted over the summer of 2021. This GTAA (2022) has identified a need for 0 pitches in the short term and 10 pitches in the long term. Potential opportunities to meet the identified need will be considered and assessed as part of the NPT RLDP 2021-2036 preparation process and the preparation of a Strategic Development Plan for the South West Wales Region.

# 1 . Executive Summary

### Introduction

**2.0.1** Neath Port Talbot has a well established and long standing Gypsy and Traveller population and currently has one of the highest populations of Gypsy and Traveller communities in Wales. There are three authorised public sites within the County Borough, two sites located at Wharf Road, Briton Ferry and one site at Cae Garw, Margam.

**2.0.2** The purpose of this study is to assess the future accommodation needs of the Gypsy and Traveller community and determine whether there is a requirement for additional site provision within Neath Port Talbot for permanent residential pitches and/or transit pitches. Undertaking the study will enable the Authority to maintain a comprehensive understanding of the future accommodation needs of the Gypsy and Traveller Community.

**2.0.3** All local authorities have a duty to assess the future accommodation needs of the Gypsy and Traveller communities in Wales under the 2014 Act. Authorities are required to:

- Periodically assess the needs of Gypsies and Travellers residing in (i.e. those who currently live in the area) and those resorting to (i.e. those wishing to move to an area or stay from time to time); and
- Report the findings of the study to Welsh Ministers for approval; and
- Meet any need that is identified in the study.

# 2 . Introduction

### 3.1 National Policy Context: Legislation and Guidance

#### WELL-BEING OF FUTURE GENERATIONS (WALES) ACT 2015

**3.1.1** This places a statutory duty on public bodies in Wales to consider sustainable development in their decision-making. The concept has been expanded so that it now incorporates, more explicitly, cultural heritage and well-being. The Well-being of Future Generations (Wales) Act 2015 influences the way we plan for new development; it demands that development and use of land contribute to improving the economic, social, environmental and cultural well-being of Wales.

**3.1.2** Sustainable Development (in Wales) is now defined by the 2015 Act as meaning "the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals".

**3.1.3** This is linked to the more traditional definition by the explanation that "Acting in accordance with the sustainable development principle means that a body must act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs".

**3.1.4** The Act has seven well-being goals which include a healthier Wales, a more equal Wales and a Wales of cohesive communities.

#### HOUSING (WALES) ACT 2014

**3.1.5** The definition of 'Gypsies and Travellers' within section 108 of the Housing (Wales) Act 2014 is: (a) persons of a nomadic habit of life, whatever their race or origin, including - (i) persons who, on grounds only of their own or their family's or dependant's educational or health needs or old age, have ceased to travel temporarily or permanently, and (ii) members of an organised group of travelling show people or circus people (whether or not travelling together as such), and (b) all other persons with a cultural tradition of nomadism or of living in a mobile home.

**3.1.6** Whilst using this definition, Gypsies and Travellers should not be described as a homogeneous group or as a single entity; Gypsy and Traveller communities can have varying lifestyles dependent on culture and heritage. Gypsies and Travellers are a racial group, as defined in the Equality Act 2010, and are therefore protected from discrimination and harassment. This means that it is against the law to discriminate against someone because of "protected characteristics" and this includes race.

**3.1.7** Under Part 3 of the Housing (Wales) Act 2014, assessing the future needs of Gypsies and Travellers has become a statutory requirement with a duty placed on all local authorities in Wales to provide additional sites where a need has been identified.

**3.1.8** Local authorities in Wales are required to periodically carry out an assessment of the accommodation needs of Gypsies and Travellers residing in and resorting to an area every 5 years. Part 3, relating to Gypsies and Travellers (with the exception of sections



## 3 . Policy Context

103 and 104) came into effect on 25th February 2015, with the first Gypsy and Traveller Accommodation Assessment (GTAA) required to be completed within one year of commencement.

**3.1.9** Once an assessment is complete, local authorities must prepare a report detailing the findings. The report should detail the methodology used, the level of consultation undertaken and form conclusions on the future accommodation needs of Gypsies and Travellers both residing in and resorting to the area. The report must be submitted to Welsh Ministers, who will either approve the assessment with or without modifications, or reject it. If an assessment is rejected by Ministers, the authority must revise and resubmit or carry out another assessment. Reasons for rejecting an assessment could include inadequate consultation or failure to provide adequate evidence in support of an assessment of need.

**3.1.10** Should an assessment identify an unmet need, authorities have a duty under Section 103 of the Act to meet this need. Should an authority fail to comply with Section 103, Welsh Ministers may direct the authority to exercise its powers under section 56 of the Mobile Homes (Wales) Act 2013 to meet the needs identified in its approved assessment.

### **MOBILE HOMES (WALES) ACT 2013**

**3.1.11** The Mobile Homes (Wales) Act gained Royal Assent on 4th November 2013 and provided an update to previous legislation. The legislation (the provisions of which have subsequently come into force throughout 2014) is designed to improve regulations of the industry and ensure that conditions on mobile home sites are improved and the rights of mobile home owners are better protected. The legislation and protection of the rights to mobile home owners is required as in some instances, whilst the mobile home owner may own their own home, the land on which it sits may be owned by a site operator or land owner.

**3.1.12** The Act introduces a license system, where site owners are required to apply for a licence from their local authority to operate a site, subject to relevant planning permissions. To obtain a licence, site managers will need to pass a 'fit and proper person' test, with licences lasting for a period of 5 years once awarded. Pitch fees charged on site can only be increased in line with the Consumer Prices Index.

**3.1.13** Under the legislation, local authorities are able to inspect sites and issue fixed penalty notices to site owners if there are issues with on-site conditions and in more serious instances may issue compliance notices.

### **PLANNING CIRCULAR 005/2018 - PLANNING FOR GYPSY AND TRAVELLER AND SHOWPEOPLE SITES**

**3.1.14** The circular provides guidance on planning for suitable sites for Gypsies and Travellers. The Circular recognises that Gypsies and Travellers are not a single entity and have varying values and lifestyles and future accommodation needs should be discussed directly with the Gypsy and Traveller community and representative bodies and groups.

**3.1.15** The Well-being of Future Generations (Wales) Act 2015 sets a framework for local authorities across Wales to ensure the ‘sustainable development principle’ (meeting the needs of the present without compromising the ability of future generations to meet their own needs) is met.

**3.1.16** Housing is a fundamental issue that affects the lives of people across Wales, including our Gypsy and Traveller communities. It is reflective of the Government’s commitment to ensure equality of opportunity for all sections of the community and in this instance, Gypsies and Travellers should have equal access to culturally appropriate accommodation as all other members of the community.

**3.1.17** The Welsh Government is committed to working with local authorities to deliver new Gypsy and Traveller sites. This commitment is addressed through the availability of Sites Capital Grant funding for the development of new sites. Changes to legislation through the Housing (Wales) Act 2014 and the Mobile Homes (Wales) Act 2013 have also supported this objective.

**3.1.18** The provision of Gypsy and Traveller sites is one of several key issues that need to be addressed through the plan making process. Where a lack of appropriate sites and insufficient provision exists within local authority areas, this has a significant detrimental impact on the lives of Gypsies and Travellers. Delivering appropriate Gypsy and Traveller site accommodation will have a beneficial impact on the communities’ ability to access other essential services. Delivery of appropriate site accommodation for Gypsy and Traveller communities could also have a beneficial impact on the settled community by reducing the number of legal challenges and costs incurred in challenging unauthorised encampments.

**3.1.19** The definition of a Gypsy and Traveller site for the purposes of this Circular does not include a dwelling (i.e. housing that falls within Use Class C3 under the Town and Country Planning [Use Classes] Order 1987 [as amended]). Those Gypsies and Travellers who wish to live in bricks and mortar accommodation will have their needs met through provision of appropriate housing. The mechanism within the planning system for local authorities to ensure a sufficient supply of land for housing is set out in Planning Policy Wales (PPW11).

**3.1.20** Local Housing Market Assessments (LHMA) are identified as providing a key source of information for assessing future accommodation needs. Where a need for additional accommodation is found, LDPs should provide additional accommodation to meet this need over the Plan period and will need to demonstrate that sites are suitable and there is a realistic possibility of the identified sites being made available for this purpose.

**3.1.21** The circular notes the suitability of a site is important for the health and well being of the community and for the maintenance and support of family and social networks. The circular provides guidance on a number of important considerations when identifying sites.

**3.1.22** In identifying sites, first regard should be given to sites in locations which are in or near to existing settlements with a range of services and facilities available, and the social, environmental and economic impacts of the site’s potential allocation will need to be assessed in accordance with the requirements of the Sustainability Appraisal.

## 3 . Policy Context

**3.1.23** Criteria based policies are required within LDPs to assess / meet future or unexpected demand. Gypsies and Travellers have the same rights and responsibilities in the planning system as other residents and social groups. As such, Plan policies and criteria must be fair, reasonable, realistic and effective in delivering sites. Policies that place undue constraints on the development of Gypsy and Traveller sites should not be included in LDPs.

### **FUTURE WALES - THE NATIONAL PLAN 2040 (February 2021)**

**3.1.24** Future Wales is the WG's national development plan and in accordance with section 38 of the Planning and Compulsory Purchase Act 2004, forms part of the statutory development plan for Neath Port Talbot County Borough Council (NPTCBC). The document outlines the WG's strategies for addressing key national priorities through the planning system and details where future WG investment will be concentrated. It covers the time period to 31 December 2040. It is a development plan with a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of our communities.

**3.1.25** Relevant Future Wales Outcomes include:

- A Wales where people live and work in connected, inclusive and healthy places.
- A Wales where people live in distinctive regions that tackle health and socio-economic inequality through sustainable growth.

**3.1.26** Future Wales has identified four separate regions across Wales where strategic development will ensure that wider than local issues will be tackled collaboratively. Neath Port Talbot is within the South West Region which covers Neath Port Talbot, Swansea and Carmarthen. Strategic Development Plans are required within each region to establish a clear strategic policy framework and provide direction for decision makers. National and/or Regional Growth Areas are identified in all four regions and their growth will be planned through the preparation of Strategic Development Plans.

**3.1.27** Future Wales Policy 19 Identifies Policies for Regional Planning and Strategic Development Plans should embed placemaking as an overarching principle and should establish for the region the gypsy and traveller need. This means that any subsequent GTAA 's will be carried out on a regional basis.

### **PLANNING POLICY WALES (Edition 11) February 2021**

**3.1.28** Planning Policy Wales defines the purpose of the planning system as being to build sustainable places that positively contribute towards the health and well-being of current and future generations.

**3.1.29** Everyone engaged with or operating within the planning system in Wales must embrace the concept of placemaking in both plan making and development management decisions in order to achieve the creation of sustainable places and improve the well-being of communities. The planning system should create sustainable places which are attractive, sociable, accessible, active, secure, welcoming, healthy and

friendly. Placemaking in development decisions happens at all levels and involves considerations at a global scale, including the climate emergency, down to the very local level, such as considering the amenity impact on neighbouring properties and people.

**3.1.30** One of the Key Planning Principles contained within PPW 11 includes facilitating accessible and healthy environments. Our land use choices and the places we create should be accessible for all and support healthy lives. High quality places are barrier-free and inclusive to all members of society. They ensure everyone can live, work, travel and play in a way that supports good physical and mental health.

**3.1.31** In assessing the Sustainable Benefits of Development; Planning authorities should ensure that social, economic, environmental and cultural benefits are considered in the decision-making process and assessed in accordance with the five ways of working to ensure a balanced assessment is carried out to implement the Well-being of Future Generations Act and the Sustainable Development Principle. Key factors in the assessment process include how does a proposal support development of more equal and more cohesive communities.

**3.1.32** Paragraph 4.2.35 of PPW 11 states that local authorities are required to assess the accommodation needs of Gypsy and Traveller families and to allocate sites to meet the identified need. Where a Gypsy and Traveller Accommodation Assessment (GTAA) identifies an unmet need, a planning authority should allocate sufficient sites in their development plan to ensure that the identified pitch requirements for residential and/or transit use can be met. Planning authorities will need to demonstrate that sites are suitable for development and deliverable in the identified timescales. In drawing up policies planning authorities should consult providers of social housing, representatives of Gypsies and Travellers communities and landowners in areas likely to be appropriate for site provision. The consultation should be undertaken in a manner that is consistent with the planning authority's Community Involvement Scheme.

### **BUILDING BETTER PLACES; Placemaking and the Covid-19 Recovery (2020)**

**3.1.33** *Building Better Places* sets out the Welsh Government's planning policy priorities to assist in taking action in the recovery period after the Covid-19 pandemic. In respect of Gypsy and Travellers the issues to consider are:

- We can all appreciate the difference between having a good quality environment to live, work and relax in and how being cut off from our friends and family can mean that a poor environment, with no or limited access to local goods, services and green spaces can have a severely detrimental impact on our mental and physical health and well-being, as well as our ability to protect our livelihoods;
- Placemaking is at the heart of this recovery;
- If we forego our policy commitment to quality, we risk repeating previous errors in allowing development on unsustainable sites in areas which did not have the infrastructure or connections to enable us to live active, healthy lives and promote better well-being in every sense;

## 3 . Policy Context

- Placemaking in Wales is a new partnership of organisations involved in the built environment coming together to help deliver quality across the sector to promote better outcomes for all;
- Placemaking will also encourage early, positive engagement on proposals and plans to inspire good practice;
- National Sustainable Placemaking Outcomes include facilitating accessible and healthy environments which is accessible by means of active travel, feels safe and inclusive, supports a diverse population and promotes physical and mental health and well-being;
- The Covid crisis has emphasised the importance of considering health and well-being throughout the planning system to ensure communities across Wales are healthy, vibrant and inclusive.

### **UNDERTAKING GYPSY AND TRAVELLER ACCOMMODATION ASSESSMENTS GUIDANCE (May 2015)**

**3.1.34** The Welsh Government has produced comprehensive guidance on how to carry out the survey. This ensures a consistent approach across Wales and gives an accurate picture as to the actual need for pitches in the future. The guidance covers everything from setting up a Steering Group, to the etiquette that must be adhered to when carrying out the survey, the questionnaire that must be asked is included as well as how to calculate the need. Any failure in following this guidance may result in Welsh Government challenging the results and not agreeing to its content.

### **WELSH GOVERNMENT DESIGNING GYPSY AND TRAVELLER SITES (2015)**

**3.1.35** The Welsh Government updated this guidance in May 2015, providing a revised good practice guide to local authorities that should be read in conjunction with another Welsh Government publication, 'Managing Gypsy and Traveller Sites'. The guidance, whilst not a statutory document, provides practical assistance to local authorities to deliver sites that are sustainable, well managed and fit for purpose, providing a good quality of life for residents which aims to promote positive relationships between the Gypsy and Traveller community and settled community.

**3.1.36** Important material considerations, including size of site, layout, access arrangements spacing of caravans and trailers, are explored in some detail to provide model standards that promote well designed sites that comply with health and safety, secure by design principles and fire standards. It is suggested that local authorities follow a 'line of best fit' when assessing potential sites and use the following general themes:

- Access: locating sites close to public roads and where possible with public transport links;
- Suitability of land: a site survey should be undertaken to identify issues such as
- drainage, flood risk and contaminated land;
- Local Services: locating sites within a reasonable distance from education, health and local services such as shops;

- Environment: consideration should be given to the location of hazards such as rivers, canals, industrial sites and major roads;
- Utilities: sites should be able to provide adequate water supply, electricity, sewerage, drainage and refuse disposal.

**3.1.37** The publication also provides guidance on transit sites, temporary stopping places and methods of consultation with stakeholders.

### **UNITED NATIONS CONVENTION ON THE RIGHTS OF THE CHILD (UNCRC)**

**3.1.38** The United Nations Convention on the Rights of the Child (UNCRC) is an international agreement setting out the rights of children. The rationale for the UNCRC is that children's rights need specific consideration due to the special care and protection often needed by children and young people.

**3.1.39** The UNCRC is a list of rights that all children and young people, everywhere in the world have. Children and young people aged 18 and under, have the right to be safe, to play, to have an education, to be healthy and be happy.

**3.1.40** There are four key articles which form the basis of the rights set out in the UNCRC:

- Right to non-discrimination (article 2)
- Commitment to the best interests of the child (article 3)
- Right to life, survival and development (article 6)
- Right to be heard (article 12)

**3.1.41** In 2004, the Welsh Government formally adopted the UNCRC as the basis of policy making relating to children and young people.

### **3.2 Local Policy Context**

#### **NEATH PORT TALBOT WELL-BEING PLAN 2018 - 2023**

**3.2.1** The Plan sets out the long term vision for NPT including priorities for the 5 year period 2018-2023. It sets out some major challenges that NPT is facing which includes how the help communities to sustain themselves and build a climate where people look out for one another. The Plan has been drawn up to meet the requirements of the Well-being of Future Generations (Wales) Act 2015. There are seven well-being goals within the Act and one of which seeks a more equal Wales that enables people to fulfil their potential no matter what their background.

**3.2.2** The vision wants Neath Port Talbot to be a vibrant and healthy place where people have an equal chance to get on in life - a place where people want to live, learn, work invest and visit for many generations to come.

**3.2.3** The Plan contains 6 objectives and objective 2 states that NPT wants to create safe, confident and resilient communities where people are able to develop towards meeting their potential, culture, a Wales where they will have an environment in which to grow strong.



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**3.2.4** Without opportunities in which to develop to their full potential, people and communities can become, fearful, distrusting and intolerant. Cohesive communities need people who have aspirations that are achievable, where they can become confident and contribute in a meaningful way within the community

### **NEATH PORT TALBOT COUNTY BOROUGH COUNCIL LOCAL DEVELOPMENT PLAN (2011 - 2026)**

**3.2.5** The Neath Port Talbot Local Development Plan (LDP) sets out the Council's planning policy for the 15 year period 2011 - 2026. Adopted in January 2016, the LDP provides a development framework to deliver prosperous, thriving, sustainable communities with social and economic opportunities available to all, whilst addressing the key issues facing the County Borough.

**3.2.6** The Plan's vision and strategy were established and underpinned by a substantial evidence base and considerable community involvement. The evidence identified a total of 18 key issues that the LDP needed to address, one of these issues (KI7) related specifically to Gypsies and Travellers and the need for additional residential pitches in the County Borough. This issue translated into some of the Plan's main objectives which formed the basis for policy development:

- OB 7: Provide an adequate supply, mix, type and tenure of housing within sustainable settlements to meet the needs of the projected population.
- OB 9: Deliver additional pitches, to meet the identified need of Neath Port Talbot's Gypsy and Traveller community.

**3.2.7** Based on the findings of the 2012 Neath Port Talbot Gypsy and Traveller Accommodation Needs Study and to meet the objectives listed above, the LDP has provided a framework to address the needs of the Gypsy and Traveller community over the Plan period through the detailed policies listed below.

**3.2.8** The 2012 Neath Port Talbot Gypsy and Traveller Accommodation Needs Study identified a need of 20 additional residential pitches over the Plan period, with 11 of these pitches required over the short to medium term of the LDP, up to 2022. These 11 pitches have been provided through an expansion of the existing, well established Gypsy and Traveller site at Cae Garw, Margam.

**3.2.9** Policy GT1 allocated land to extend the existing site at Cae Garw, Margam. The allocation created 11 new permanent, residential pitches to meet the identified need over the short to medium term of the Plan, up to 2022.

**3.2.10** Whilst the allocation identified in Policy GT1 met the identified need, there maybe future applications for additional sites over the Plan period, which will need to be assessed on individual merits. To assess such applications, Policy GT2 provides a policy framework and sets out a criteria based approach to ensure future sites are sustainable, located in close proximity to community facilities and have utilities such as water supply, drainage and waste disposal.

**3.2.11** The Plan's monitoring framework closely monitors the implementation and take up of the new pitches and will review the requirement for the latter part of the Plan, post 2023. A new GTAA will be undertaken every 5 years, in line with the requirements of the Housing (Wales) Act 2014, which will further inform the provision of Gypsy and Traveller pitches over the Plan period.

### **Policies of the LDP:**

#### **Policy SP 9 - Gypsies and Travellers**

Provision will be made for 20 Gypsy and Traveller pitches through the following measures;

1. the allocation of a site ; and
2. providing a framework to assess proposals for additional Gypsy and Traveller sites.

#### **Policy GT1 - Gypsy and Traveller Site**

The following site is allocated for the provision of 11 Gypsy and Traveller pitches:

**Table 3.2.1**

Reference	Site
GT1	Cae Garw, Margam

#### **Policy GT2 - Proposals for New Gypsy and Traveller Sites**

Sites and/or pitches to accommodate Gypsies and Travellers residing in, or resorting to, the County Borough will only be permitted where all the following criteria, where relevant, are satisfied:

1. Sites will be allowed outside settlement limits only when it has been demonstrated that there are no suitable sites or pitches available within:
  - (a) the allocated Gypsy Site at Cae Garw (GT1), or within other existing authorised Gypsy and Traveller sites in Neath Port Talbot; or
  - (b) within existing settlement limits.
2. The site is in a sustainable location within reasonable distance of community facilities (including education) and transport links including walking and cycling routes;
3. The site has or would have a good standard of utilities including water supply, power, drainage, sewage disposal, waste disposal (storage and collection) and safe play areas for children;
4. The site will not be detrimental to residential amenity or the environment;
5. The site can accommodate home-based business uses where required without detrimentally affecting the amenity and character of the area;
6. The site can accommodate a safe and convenient access to the highway network and would not compromise highway safety and can provide an appropriate layout, in



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terms of pitches, parking and manoeuvring of vehicles, amenity buildings, hard standings and open spaces.

**3.2.12** The Review Report for the LDP published in July 2020 states in reference to the GTAA 2022 that; "This study will identify the needs of the Gypsy and Traveller Community over the period of the Replacement Plan and will be used to form a new policy if a need is identified. The extension of 11 pitches at Cae Garw was completed in 2016 and therefore Policy GT1 will need to be amended during the review to reflect the new assessment. Policy GT2 may require some minor amendments to ensure conformity with the new Circular."

### **NEATH PORT TALBOT COUNTY BOROUGH COUNCIL LOCAL HOUSING STRATEGY (2015 - 2020)**

**3.2.13** Neath Port Talbot's Local Housing Strategy sets out an agreed vision for addressing the housing needs of its citizens over the forthcoming years:

**3.2.14** "Our Vision is that Housing in Neath Port Talbot will be appropriate, affordable, of good quality, in sustainable communities, offering people choice and support if they need it".

**3.2.15** The Local Housing Strategy (LHS) had been produced at a time of considerable change. The Housing (Wales) Act 2014, Wales' first ever housing act proposes to improve the supply, quality and standards of housing in Wales. This includes improvement of the private rented sector, better standards in social housing, help to meet people's housing needs and prevent homelessness, enhance communities and help prevent the difficulties and lack of opportunities often encountered by vulnerable people.

**3.2.16** Housing impacts on all aspects of life and on all of society regardless of age, race, status etc. Housing is essential to meeting basic human needs, such as shelter; but it is not just a question of four walls and a roof, housing should offer a place to sleep and rest where people feel safe and have privacy and personal space; somewhere they can raise a family. All of these elements help make a house a home.

**3.2.17** The findings from the Local Housing Market Assessment produced jointly with the City and County of Swansea are the main feature within the document which analyses the local housing market and identifies the need for affordable housing. The housing mix indicated that 61% of market housing was required and 39% of social housing and other affordable housing was necessary to meet the housing need.

**3.2.18** In 2016 Neath Port Talbot County Borough Council decided to undertake the next Gypsy & Traveller Accommodation Needs Assessment in-house using the Welsh Government guidance 'Undertaking Gypsy and Traveller Accommodation Assessments'. This GTAA was undertaken by the Authority's Housing Strategy and Planning Policy Sections with help from colleagues within the Estates' section of the Authority to collect the primary data for the study through interviews / questionnaires.

**3.2.19** The main objective of the GTAA study was to assess the need for authorised Gypsy and Traveller site provision within Neath Port Talbot and of which required the identification of whether any extra site provision should be on public or private sites, and whether or not there was any need to plan for the provision of transit sites or emergency stopping places. The outcomes from the study helped the Authority meet the requirements of the Housing Act 2004 and provide evidence to assist the Local Development Plan (LDP) on the need for additional pitches in Neath Port Talbot and to inform the Local Housing Strategy

### **LOCAL DEVELOPMENT PLAN (2011-2026) ANNUAL MONITORING REPORTS FINDINGS (2017-2021)**

**3.2.20** The AMR includes findings from monitoring the effects of the plan in terms of the effectiveness of the policies themselves and the delivery of the SA objectives.

**3.2.21** Due to the statistical inaccuracies associated with predicting the longer term needs of the Gypsy and Traveller community, who by their very nature have nomadic lifestyles, it was the Council's view that the remaining need identified in the 2016 GTAA (beyond 2022 to 2026) would be reviewed as part of the LDP's Monitoring Framework and addressed by the Plan's Annual Monitoring Report (AMR) – this was subsequently endorsed by the Inspectors in their binding report. As part of each Annual Monitoring Report, instances of unauthorised encampments are also recorded in order that any, as yet undiscovered, transit need is identified or not.

#### **LOCAL DEVELOPMENT PLAN; ANNUAL MONITORING REPORT 2017**

**3.2.22** The first published AMR was in October 2017. Within the monitoring period, the Council submitted and received Ministerial approval for the 2016 Gypsy and Traveller Accommodation Assessment, the first assessment under the Housing (Wales) Act 2014. This latest assessment concluded that the 11 pitches implemented by the Council was sufficient to meet the needs of the community up to 2021. For the remainder of the LDP period (i.e. up to 2026) the assessment identified a need of 4 additional pitches, lower than the 9 pitches originally projected within the 2012 GTAA. A further GTAA is required by 2021 and this will assess the longer term need more accurately.

**3.2.23** There have been no new Gypsy and Traveller sites permitted within the monitoring period and no unauthorised encampments reported. On this basis, it is not considered that any action is required at this time, and monitoring will continue over the next year.

#### **LOCAL DEVELOPMENT PLAN: ANNUAL MONITORING REPORT 2018**

**3.2.24** The most recent assessment, the 2016 Gypsy and Traveller Accommodation Assessment, concluded that the 11 pitches provided at Cae Garw was sufficient to meet the needs of the community up to 2021.

**3.2.25** Over the monitoring period, there has been one unauthorised encampment in the County Borough. The encampment was accompanied by a planning application to change the use of the land to a private Gypsy and Traveller site. This application was

## 3 . Policy Context

refused by the Council as it was considered contrary to the LDP, with the applicant taking the Council's decision to appeal. The appeal was subject to a hearing in April 2019, and will therefore be detailed within the next AMR.

### **LOCAL DEVELOPMENT PLAN: ANNUAL MONITORING REPORT 2019**

**3.2.26** Over the monitoring period, there has been one unauthorised (residential) private encampment in the County Borough. In addition, there were 7 short-term encampments (transit) on 4 sites recorded during the reporting period, ranging from 3 days to 15 days.

**3.2.27** The private residential site was the subject of an appeal hearing in April 2018 against refusal of a planning application (and associated Enforcement Notice), with the planning appeal having been allowed and a personal planning permission granted for up to 2 caravans in August 2018.

**3.2.28** The appeal is of note insofar as the traveller family in this case had previously resided at the Council's authorised Cae Garw site, but chose to move off the site onto a private site based on their personal family circumstances. The appeal decision therefore raised many issues surrounding the management of the Council's existing site at Cae Garw. However, while the personal circumstances of that family were considered to override the policy conflict, it is considered that Policy GT2 remains robust and fit for purpose in assessing proposals for new sites and that Policy GT1 allocates sufficient sites to meet identified gypsy and traveller accommodation requirements.

### **LOCAL DEVELOPMENT PLAN: ANNUAL MONITORING REPORT 2020**

**3.2.29** Over the monitoring period, there were 3 unauthorised encampments. Each of the encampments only lasted for a period of a few days and did not require any further action.

### **LOCAL DEVELOPMENT PLAN: ANNUAL MONITORING REPORT 2021**

**3.2.30** Over the monitoring period, there was only 1 unauthorised encampment. This encampment was in relationship to family wanting to be near a hospitalised relative (due to Covid) and only lasted for a period of a few days and did not require any further action.

**3.2.31** One application for two pitches within the Authority area and this was refused amongst other matters as it was contrary to Policy GT 2 and it was in a flood zone and was seeking to place a highly vulnerable development in a dangerous location.

### **LDP Review Report (2020)**

**3.2.32** The Review Report identifies the key issues to be considered when taking the existing LDP forward and sets out areas where the current LDP is delivering and performing well, in addition to those areas where changes may be required. Importantly, it is not the purpose of the Review Report to detail any changes that may be made to the Plan. The detail and extent of any changes will only be identified through the preparation process of the Replacement Plan.

**3.2.33** Neath Port Talbot has a well established Gypsy and Traveller Community. Policy SP9 provides the policy framework for ensuring there is adequate pitch provision to accommodate the needs of the community over the Plan period, through the allocation of a site and providing a criteria policy to assess applications for new sites. The policy was informed by the findings of the 2012 Gypsy and Traveller Accommodation Assessment (GTAA) which identified a need of 20 pitches: 4 pitches by 2017; 7 pitches by 2022; and 9 pitches by 2026. To accommodate the short to medium term need (11 pitches by 2022) an extension to the existing site at Cae Garw, Margam was allocated, with the longer term need (9 pitches 2023-26) to be addressed through the monitoring framework based on updated GTAAs.

**3.2.34** GTAAs are required at intervals of at least 5 years, with the next assessment due by 2021. This study will identify the needs of the Gypsy and Traveller Community over the period of the Replacement Plan and will be used to form a new policy if a need is identified. The extension of 11 pitches at Cae Garw was completed in 2016 and therefore Policy GT1 will need to be amended during the review to reflect the new assessment.

**3.2.35** The Officer Working Group found the general policy approach to be working effectively. Since LDP adoption, Planning Circular 005/2018 'Planning for Gypsy, Traveller and Showpeople Sites' was published, providing guidance on the duty to provide sites, engaging the community in the process and policies to include within development plans. Policy GT2 may require some minor amendments to ensure conformity with the new Circular.

### **Replacement LDP 2021- 2036 Draft Delivery Agreement Consultation**

**3.2.36** A public consultation took place on a draft Delivery Agreement between the 16th August, 2021 and the 27th September, 2021. Its purpose is to set out:

- The Council's RLDP preparation timetable outlining the various stages of plan preparation, when these will be undertaken and when engagement will take place;
- Details of the Community Involvement Scheme (CIS), detailing who will be involved in the RLDP preparation process and how and when participation and collaboration will occur; and
- The resources the Authority will invest in plan preparation.

**3.2.37** The Delivery Agreement (DA) is a statutory requirement of the Plan preparation process under Regulation 9 of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as revised by the Local Development Plan (Wales) Amendment Regulations 2015), and must be approved by resolution of the Council and the Welsh Government (WG).

**3.2.38** The Council hopes to achieve ministerial sign off of the agreement in January 2022, following which formal preparation of the Replacement Local Development Plan (RLDP) 2021-2036 will begin.

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### 4.1 Current Accommodation Provision

#### Public Residential Sites

**4.1.1** The Gypsy and Traveller community in Neath Port Talbot is well established, with 67 permanent residential pitches over three authorised public sites: two sites are located at Wharf Road, Briton Ferry with a further site at Cae Garw, near Margam.

**4.1.2** The sites at Wharf Road and Cae Garw have been constructed in phases over a period of time; the original Briton Ferry site was developed in the 1980's, with the larger element of the site constructed later during the 1990's. Both original phases of the Cae Garw site were also completed in the 1990's and the extra 11 pitches were added in 2016. All sites are permanent, have full planning consent and are owned by the Local Authority.

**4.1.3** All sites were originally managed by the Authority until June 2000, at which time the management was transferred to the National Gypsy Council, with Neath Port Talbot Council retaining a small role liaising directly with the Gypsy Council. This arrangement continued until September 2013, at which time the full management responsibilities reverted back to Neath Port Talbot County Borough Council.

**4.1.4** Upon regaining full management of the sites, the Authority assessed the standard of pitches on all sites and found that the sites had deteriorated over recent years, mainly due to general wear and tear and limited maintenance. To rectify this, the Authority prioritised the required works, and through Welsh Government grant funding and some of the Council's own resources set about undertaking a considerable amount of improvement and upgrading works.

**4.1.5** The upgrading and improvement works set about improving the standard of living across all sites, ensuring all pitches were in a good habitable condition ensuring a good quality of life for residents. In summary, improvements included the following:

- The replacement of windows and doors on facility blocks;
- Due to deterioration of facility blocks, walls and ceilings were lined with UPVC Cladding;
- Electrical re-wiring, including new fixtures and fittings and external weatherproof boxes;
- New fencing to provide screening and privacy for sites and also fencing and gates to individual pitches to improve security and safety for small children;
- A new site office at Briton Ferry to provide a community facility to hold meetings and an area for the site warden(s) to undertake their duties;
- Improvements to facility blocks and upgrades to kitchens and bathrooms;
- Increasing the number of pitches to 67.

#### Current Vacancy Levels

**4.1.6** The survey carried out in the summer of 2021 revealed current vacancy levels to be low with only 4% (3 out of 67 pitches) vacant. 2 of the pitches were on the Gae Garw site, and 1 pitch on the Briton Ferry New Site.

## 4 . Background

### Unauthorised Encampments

**4.1.7** Neath Port Talbot, generally, has experienced very low levels of unauthorised encampments. Early in 2021 there was an unauthorised encampment of 4 caravans. This came about due to an elder member of a large family needing hospitalisation in Morriston due to Covid-19. The family gathered to be near to the hospital and support each other. When his health improved they all left the area they were camped on.

**4.1.8** This picture is supported by the live caravan count system which only recorded 5 unauthorised encampments since 2016. 3 of those encampments were in 2021, one in 2018 and one in 2017. Apart from the two encampments in the Pontardawe area, there is no pattern to the location or occurrence of the encampments.

### Private Sites

**4.1.9** There is currently one private site in Neath Port Talbot comprising of 1 pitch for two caravans. Within the past 5 years, there has been only two planning applications for a new pitch/site made for private residential provision. The first was for 1 pitch granted on appeal in rural Margam in 2018. The second was made in late 2020 in the Dulais Valley and was again for a 2 pitch provision. This was refused planning permission on the 12th February, 2021. Both applications were submitted by a member of the Gypsy and Traveller community linked to Neath Port Talbot.

### Travelling Showpeople

**4.1.10** There are no known permanent Travelling Showpeople in Neath Port Talbot. There are a number of fairs that visit the area, the largest of which is the September Neath Fair, which has a long standing history and connection to the area. Contact with the representative organisation for Travelling Showpeople confirmed that they have no need for accommodation provision in the Neath Port Talbot area.

### Transit / Emergency Stopping Site Provision

**4.1.11** Neath Port Talbot currently contains no Transit or Emergency Stopping Site Provision. The travel patterns identified through NPT as well as the very low instances of unauthorised encampments confirm that this is the correct position.

## 4.2 Previous GTAA Findings

**4.2.1** In 2016, Neath Port Talbot County Borough Council carried out an in-house survey following the Welsh Government Guidance "Undertaking Gypsy and Traveller Accommodation Assessments" by the Authority's Housing Strategy and Planning Policy Sections. Completed in February 2016, the study reviewed the Gypsy and Traveller accommodation need within the County Borough for the 15 year period, up to 2027.

**4.2.2** The 2016 GTAA was published shortly after the LDP was adopted. The 2016 Study identified no need (an oversupply of 3 pitches) in the short term (2016 – 2021) with 4 pitches required on public residential sites towards the end of the LDP period 2022 – 2026). This need takes into account the supply resulting from the 11 pitches that received



planning permission in February 2015 and the two pitches on the Briton Ferry site that were brought back into use. For the remainder of the LDP period (i.e. up to 2026) the assessment identified a need of 4 additional pitches, lower than the 9 pitches originally projected within the 2012 GTAA.

**4.2.3** Due to the statistical inaccuracies associated with predicting the longer term needs of the Gypsy and Traveller community, who by their very nature have nomadic lifestyles, it was the Council's view that the remaining need for pitches would be reviewed as part of the LDP's Monitoring Framework and addressed by the Plan's Annual Monitoring.

**4.2.4** In undertaking the study, interviews were carried out with all households on the existing sites. The success rate for the interviews was high with 59 face-to-face completed interviews obtained (100%) - 56 households on the three sites, 2 in bricks and mortar and 1 on an unauthorised encampment.

### Local Connection

**4.2.5** The survey found that a high percentage of respondents, 45 out of a total of 59 respondents (76%), had a local connection with Neath Port Talbot (either through family or work), a further 13 respondents (22%) stated that there was no alternative pitch available and 1 respondent (2%) stated that they could not find a house to move to.

### Length of Residence

**4.2.6** In terms of length of residence, 42 Respondents (72%) had lived on their current site for over 5 years. This is in contrast with 3 Respondents (5%) who had been resident on the site for less than a month. The remaining data reveals 9 Respondents (15%) having been resident from a period of 1 month to 2 years, and 5 Respondents (9%) resident for a period of between 2 and 5 years.

### Previous Residence

**4.2.7** 10 Respondents (17%) indicated that they had moved within the last year. Of those 10:

- 1 Respondent indicated they were residing within the Neath Port Talbot Borough in a 'House' prior to entering onto the Local Authority's Authorised Site(s);
- 8 Respondents confirmed that they had been living outside of the Local Authority's Borough prior to entering onto the Local Authority's Site(s);
- 1 Respondent indicated that they were residing between 2 Local Authority Boroughs (Neath Port Talbot and Bridgend) in a 'Caravan and a House'.
- Of the 8 Respondents who had confirmed they had been living outside of the Borough:
- 2 Respondents had indicated the type of accommodation they had been living in was a house;
- 3 Respondents had indicated they had been living on caravan sites and therefore presumably in caravan accommodation;



## 4 . Background

- 2 Respondents indicated they were living on the roadside and therefore we can assume they were in caravan accommodation;
- 1 Respondent had not indicated the type of accommodation they had been living in prior to entering the Neath Port Talbot County Borough.

### Length of Stay

**4.2.8** Respondents were asked how long they planned to stay in the Neath Port Talbot area. All Respondents answered this question with 50 Respondents (85%) stating that they were not intending to move from their existing site, 7 Respondents (11%) did not know how long they would stay on site, 1 Respondent (2%) indicated that they intended to stay for 3-28 days (unauthorised encampment) until alternative accommodation had been secured (the Respondent has since moved into private rented accommodation) and 1 Respondent (2%) indicated that they intended to stay for over 5 years.

### 4.3 Population Data and Caravan Count

#### 2011 Census

**4.3.1** The 2011 Census allowed respondents to identify themselves as Gypsy and Traveller for the first time. In England and Wales as a whole, there were 58,000 people identified within this category, accounting for 0.1% of the overall population of England and Wales, and was the smallest of all ethnic groups listed within the Census. Of those respondents, the highest proportion (61%) of Gypsies and Traveller households lived in a house or bungalow, with 24% of households living in caravans or other mobile or temporary structures.

**4.3.2** Of those identifying as Gypsy and Traveller in England and Wales, a high proportion, 39%, were aged under 20, which was significantly higher than the whole population of England and Wales, where 24% were within this age category. The median age of the Gypsy and Traveller population was 26, compared to a median age of 39 for the total population of England and Wales. In terms of family formation, 45% of Gypsy and Traveller households had dependent children, compared to 29% (the average for England and Wales as a whole).

**4.3.3** Whilst featuring Gypsy and Travellers as an ethnic group within the Census is a positive addition to the survey, it should be noted that these figures may not be representative of the whole community for a number of reasons. The category within the Census was, 'White: Gypsy or Irish Traveller'; and whilst some community members may identify themselves within this category, others may have a stronger affiliation with other ethnic categories such as White Irish, Roma, Travelling Showpeople or New Travellers who may not identify with the Gypsy and Traveller ethnic group. In addition, there may be some instances where Gypsy and Travellers may not have taken part in the Census or may have declined to self-ascribe their ethnicity for fear of discrimination.

**4.3.4** In Wales alone there were 2,785 Gypsies and Travellers who identified themselves within the 'White: Gypsy or Irish Traveller' ethnic group, with 125 of these residents residing in Neath Port Talbot, which represented less than 1% of the total population of the County Borough.

Table 4.3.1 Total Population and Gypsy and Traveller Population

	All categories Accommodation  Type	Whole House or Bungalow  Total	Whole House or Bungalow  Detached	Whole House or Bungalow  Semi-detached	Whole house or Bungalow  Terraced	Flat, Maisonette or apartment or mobile or temporary Accommodation
NPT All categories	138,682	129,754	30,519	63,094	36,141	8,928
NPT White; Gypsy or Irish	125	51	17	24	10	74

Source: 2011 Census (ONS\_DC2121EW - Ethnic Group by Accommodation Type - from Nomis, 27 July 2015).

**4.3.5** Table 4.3.2 on page 23 shows the number of Gypsy and Traveller households by Local Authority. In comparison with the rest of Wales, the Census indicates that Neath Port Talbot has the fourth highest number of households in Wales living in a caravan or other mobile or temporary structure, with only Cardiff, Pembrokeshire and Torfaen having a greater number of households in this type of accommodation.

**4.3.6** The table indicates that in Neath Port Talbot there were 25 households living in a caravan or other mobile or temporary structure. However, at the time of the Census there were 54 residential pitches in the County Borough, with generally high levels of occupancy. Potentially, therefore, there could be a greater concentration of Gypsy and Travellers in Neath Port Talbot, and indeed other areas of Wales than indicated by the Census. For this reason, and given the relatively small sample size in Neath Port Talbot, whilst the Census provides a useful indication of demographic and social factors, it is difficult to construct meaningful conclusions around future growth, particularly as the previous 2001 Census did not feature Gypsy and Traveller as an ethnic category. The bi-annual caravan count and questionnaire element of this survey will therefore provide a more detailed analysis of the Gypsy and Traveller community and future need.

Table 4.3.2 Census 2011: Number / Type of Gypsy and Traveller Households by Local Authority

	Total; Accommodation Type	House or Bungalow	Flat, Maisonette or Apartment	Caravan or other Mobile of Temporary Structure
Wales	1,004	602	116	286
Blaenau Gwent	30	15	0	15
Bridgend	26	18	4	4
Caerphilly	14	11	0	3
Cardiff	158	70	36	52
Carmarthenshire	120	91	7	22

## 4 . Background

Ceredigion	29	21	5	3
Conway	33	29	3	1
Denbighshire	16	11	4	1
Flintshire	38	30	1	7
Gwynydd	72	54	11	7
Isle of Anglesey	30	19	6	5
Merthyr Tydfil	29	16	4	9
Monmouthshire	3	3	0	0
<b>Neath Port Talbot</b>	<b>47</b>	<b>20</b>	<b>2</b>	<b>25</b>
Newport	28	23	3	2
Pembrokeshire	151	75	14	62
Powys	52	31	6	15
Rhondda Cynon Taf	22	16	3	3
Swansea	20	13	3	4
The Vale of Glamorgan	6	4	0	2
Torfaen	50	15	2	33
Wrexham	30	17	2	11

Source: 2011 Census

### 2021 Census;

**4.3.7** The 2021 Census will give a more accurate figure for NPT's Gypsy and Traveller population however, this data was not available for the 2022 GTAA as it is due to be published some time between the spring of 2022 and the spring of 2023.

### NPT Vulnerable Learner Service

**4.3.8** NPT Vulnerable Learner Service records indicate that as at the 2nd of February, 2021 there were 113 pupils registered and engaged in education who identify as Gypsy and Traveller. All pupils have access to the usual school-based support as well as involvement in School from the organisations 'Travelling Ahead' and the 'Youth Action Service'.

**4.3.9** Analysis of records show that of the 113 Pupils registered, 45 (39.8%) were being home-educated and the remaining 68 (60.2%) were being educated within 17 of the local schools operating within the County Borough. The gender split of those home-educated, were 57 Male and 56 Female with the age profile shown in the table below for all children in education.

**4.3.10** Of those pupils being educated within a formal school environment; 50 pupils were based within 13 Primary/ Junior Schools, catering for pupils aged between 3 & 7 years; and 17 pupils were based within 4 Comprehensive/ 6th Form Centres, catering for pupils aged 11+ years.

**4.3.11** None of the 17 Schools were Welsh-medium so all of the children are being educated through the English language. The remaining 46 children across all age ranges are being educated by their parent at home with the support of the NPT Vulnerable Learner Service.

**Table 4.3.3 Age Range of Gypsy and Traveller Pupils Educated (both within and outside a formal School Environment)**

AGE	TOTAL
3 years	0
4 years	3
5 years	5
6 years	16
7 years	11
8 years	8
9 years	10
10 years	3
11 years	7
12 years	10
13 years	7
14 years	15
15 years	7
16 years	6
17 years	5
TOTAL	113

Source: Vulnerable Learner Service Records

### Caravan Count

**4.3.12** The Gypsy and Traveller Caravan Count is undertaken by local authorities in Wales, with the data collated by the Welsh Government. The count is of the number of caravans and not the number of households or pitches. The Count records whether the caravans are on authorised or unauthorised sites, and whether they are public or private.

## 4 . Background

**4.3.13** Caravan counts are undertaken on a bi-annual basis, in January and July each year on a specific day. The Welsh Government also operates a reporting system whereby any unauthorised encampments that occur outside of the two days, can be recorded. This live stand alone system runs alongside the traditional bi-annual caravan count system.

**4.3.14** The most recent caravan count was conducted in July 2021, with 22 local authorities participating in the study. The count recorded a total of 1,095 Gypsy and Traveller caravans across a total of 143 sites. This represented an increase in caravans of 2.8% (30 caravans), and an increase of 2.9% (4) sites (both authorised and unauthorised) from the previous count in January 2021. Of the 1,095 caravans recorded, 85% (928 caravans) were on authorised sites of which 618 (67%) were on Local Authority pitches, and 310 (33%) on private sites. A comparison with the July 2020 count could not be completed because a count was not undertaken in July 2020 due to the Covid-19 pandemic.

**4.3.15** At the time of the study, there were a total of 409 authorised permanent pitches provided by Local Authorities, 10 of which were vacant. A further 2 transit pitches were provided by Local Authorities, both of which (2 pitches) were vacant at the time the study was conducted. Cardiff, Pembrokeshire and Neath Port Talbot had the highest number of pitches provided by local authorities (80, 73 and 67 pitches respectively) accounting for over half of the total number of pitches (54%).

**Table 4.3.4 Neath Port Talbot Bi Annual Caravan Count (July 2016-2021)**

Date	Jan 2016	July 2016	Jan 2017	Jul 2017	Jan 2018	Jul 2018	Jan 2019	Jul 2019	Jan 2020	Jul 2020	Jan 2021	July 2021
No. of Caravans	92	98	103	95	97	99	108	100	101	n/a	97	110

### 5.1 Study Methodology

**5.1.1** Following deliberation with Council colleagues it was agreed that the Study would be undertaken 'In-House' as a previous GTAA carried out by external consultants had yielded a poor response rate compared to 2016 when there was a response rate of 100%. It was agreed that the Council was still in a position to utilise the knowledge and skills of its staff as well as build on the good relationships made with local Gypsy & Traveller community members, particularly those members living on existing Council-run sites in Neath Port Talbot.

**5.1.2** It was agreed that Neath Port Talbot County Borough Council's Planning Policy would undertake the full Project Management of the Gypsy & Traveller Survey and Housing Strategy Officers assist; this included the co-ordination of a Gypsy & Traveller Project Steering Group and the production of an Assessment Report which would provide calculation of the level of Accommodation Needs, to be submitted to Welsh Government on completion. The Council's Gypsy & Traveller Liaison Officer would assist in promoting the study to known households, conducting the Accommodation Survey seeking to interview each 'known' Gypsy & Traveller household within the County Borough (up to 3 times as per Welsh Government Engagement Checklist / Guidance) and deal with any queries posed at the time of interview or when on-site.

**5.1.3** A 'far and wide' approach was undertaken in completing this assessment including;

### 5.2 Project Steering Group and Consultation

**5.2.1** The Gypsy & Traveller Steering Group was made up of Key Partners and Stakeholders whose remit include working with / representing the Gypsy and Traveller Community within Neath Port Talbot:

- Neath Port Talbot Council's Housing Strategy Team;
- Neath Port Talbot Council's Planning Policy Team;
- Councillor Annette Wingrave (Cabinet Member with responsibility for the LDP)
- Neath Port Talbot Council's Gypsy & Traveller Liaison Officer;
- Gypsy and Traveller Site Wardens (through constant liaison and feedback);
- Neath Port Talbot Council's Consultant Social Worker, Childcare Team and Traveller's Rights;
- Neath Port Talbot Council's Equalities and Engagement Officer;
- Neath Port Talbot's Vulnerable Learner Service;
- Tai Tarian and Coastal Housing Representative;
- Swansea Bay Health Board Health Visitors for the Gypsy & Traveller Community;
- Senior Programme Officer: Travelling Ahead - Save the Children;
- Representatives from The Wallich;
- Representatives from Thrive Women's Aid;
- Local Area Co-Ordinator;
- Chair of Regional Gypsy & Traveller Multi-Agency Forum (Swansea Bay);
- Regional Community Cohesion Co-Ordinator
- Representative from 'Voices Have Spoken' – Swansea Bay Regional Equality Council;

## 5 . Methodology

- Regional Community Cohesion Co-ordinator (Swansea, NPT and Bridgend);
- Local Councillor Briton Ferry;
- Local Councillor Margam.
- Representatives from South Wales Police;
- Representatives from Families First Youth Service NPT.

**5.2.2** The Gypsy & Traveller Steering Group was fundamental in delivering the Study and in ensuring the process was informed by all available expertise to produce the most effective assessment possible. The Group were fully consulted on the GTAA before, during and after the Assessment; providing maximum opportunity for feeding back.

**5.2.3** An Information Sharing Group was considered but due to the delay caused by Covid-19 restrictions and the need to proceed with the survey itself, the Information Sharing Group were all members of the Steering Group and fed their information directly to the Steering Group without any loss of value to the exercise being carried out - the survey.

**5.2.4** The Steering Group members that were able to supply data for cross referencing were;

- Neath Port Talbot Council's Housing Strategy Team;
- Neath Port Talbot Council's Planning Policy Team;
- Neath Port Talbot Council's Gypsy & Traveller Liaison Officer;
- Neath Port Talbot Council's Consultant Social Worker, Childcare Team and Traveller's Rights;
- Senior Programme Officer: Travelling Ahead - Save the Children;
- Swansea City Council Traveller Liaison Officer;
- Swansea Bay Health Board Health Visitors for the Gypsy & Traveller Community;
- Representative from 'Voices Have Spoken' – Swansea Bay Regional Equality Council;
- Neath Port Talbot Vulnerable Learner Service.

**5.2.5** The first meeting of the 2022 GTAA Steering Group took place on the 6th July, 2021. The purpose of this first meeting was to provide an overview of the assessment exercise and to give the opportunity of sharing with key partners, who were most likely to have access to the local Gypsy and Traveller Community, all relevant information relating to the exercise. This first meeting confirmed the membership on the Steering Group including members of the Gypsy and Traveller community as well by way of constant liaison as opposed to physically attending the sessions.

**5.2.6** The Steering Group quickly established the Survey Team as being made up of NPTCBC Officers who all had long term links with the G&T community and all of which were trusted by them. The Steering Group agenda also touched upon the importance of identifying any Gypsy and Travellers living within bricks and mortar accommodation that may require (due to a psychological aversion to such accommodation) to live within a mobile home on a Gypsy and Traveller site.

**5.2.7** The timetable for the survey was agreed along with the Covid protocols to be followed.



**5.2.8** There was agreement on how the survey was to be shared out amongst the survey team and that there would be site visits to both make the two communities and "bricks and mortar" gypsies aware that the survey was about to occur and why they should take part.

**5.2.9** A training session on how to carry out the survey was agreed and fully attended some days later.

**5.2.10** An awareness raising exercise was also agreed which comprised a poster/flyer for both sites and every caravan, doctors, dentist, pharmacist and school. and every Member of the Council. This would take place prior to the survey to give the community time to accept the value of the exercise to them and consider their responses. It would also allow time for "the word to spread" both amongst the two sites but more importantly, amongst the "hidden community" in bricks and mortar.

**5.2.11** A further Steering Group meeting to consider the results and draft GTAA 2022 was held on the 11th January 2022 where a detailed discussion focussed around the following points:

- 2011 Census Data and the poor detail expected from the forthcoming 2021 Census
- Education needs of Gypsy & Traveller children and the high proportion being home educated.
- Engagement with Travelling Show People and their confirmed accommodation needs within the adjoining authority of Swansea. It was agreed that the Welsh Government would be contacted separately to raise concerns that Travelling Show People do not consider themselves to be part of the Gypsy & Traveller community as defined by legislation. Also to request a review of the questionnaire within the Undertaking Gypsy & Traveller Accommodation Assessments Guidance (2015) to be undertaken with a view to providing further guidance on appropriate engagement with the Travelling Show Person's Community and the Romani Community specifically.
- Concerns around improvements to facilities on sites required given recent antisocial events.
- Perceived pressure for accommodation from the adjoining authorities of Bridgend & Swansea, given their current insufficient pitch provision to meet needs. However, discussion between officers confirmed that neither authority received survey responses which identified a need within Neath Port Talbot and vice versa.
- The adult community not expecting their children to form new households in the within their current community.

**5.2.12** The G & T Steering Group received a comprehensive presentation setting out the methodology, findings of the survey and future pitch needs calculations. Following consideration and discussion, the conclusions of the assessment were accepted and the procedural next steps were set out.

### Community Involvement

**5.2.13** In forming the Steering Group, the Authority used various means to publicise the study to the Gypsy and Traveller Community and encourage their participation.



## 5 . Methodology

**5.2.14** At the first Steering Group the partners and organisations working with the Gypsy and Traveller Community were in agreement that the best form of publicity for the survey would be "word of mouth". All members of the Steering Group agreed to both raise awareness and the design of a poster/flyer to support this was agreed along with their role in distributing them also (Appendix A).

**5.2.15** Since the Local Authority regained full management responsibilities of all three sites in September 2013, the Authority's Gypsy Liaison Officer has built up a good relationship with the Community. The NPT Gypsy and Traveller Forum has also established a very positive relationship with the sites and those Gypsy and Travellers in bricks and mortar as they work with this community on a regular basis. The survey team which was made up of the Liaison Officer, Senior Social Workers, members of the Vulnerable Learner Service, an Area Co-ordinator and Support Worker visited each household living on the authorised sites to explain the purpose of the study to residents and answered any queries. During these visits the posters/flyers advertising and explaining the study were delivered and left in communal areas.

**5.2.16** A QR Code was also placed on the poster/flyer which allowed all the information be displayed on people's phones was used. A dedicated phone line was set up to answer any query or to get contact details out of hours so that no opportunity was missed. The poster/flyer was also distributed to local doctors surgeries, pharmacies, dentists, schools, RSL's, anywhere that people may be calling in at and spending some time browsing while they wait.

**5.2.17** Members of the Wallich were particularly helpful in raising awareness of the study and getting agreement to take part. They were a useful contact point for "hidden gypsies " in bricks and mortar.

**5.2.18** Residents representatives were sought by way of the site wardens (one is in each site and both are from the Gypsy and Traveller Community and live on site). It was felt by both sides that the Steering Group may be overwhelming and therefore close liaison and feedback was the best alternative to ensuring that as many residents as possible (both on-site and off) were aware and willing to contribute and fully informed as to the progress.

**5.2.19** Two web pages belonging to NPTCBC , that of Planning and Housing, were also used to raise awareness of the study and to signpost to the survey team.

**5.2.20** One critical part of the process to date has been the commitment to publicising the results of the GTAA. The intention is that following the publication of the survey that the site wardens are informed, that letters will be hand delivered to all the residents who took part in the study to inform them of the findings.

**5.2.21** The next step of the process will be that nominated officers are available on any aspect of the findings of the Assessment.

### Neath Port Talbot Council Briefing

**5.2.22** The Cabinet Members responsible for both Planning and Housing along with ward Councillor's who currently have official sites within their constituencies were all members of the Steering Group. All other Members were made aware of the study as it was explained to them with an e-mail. Covid restrictions prohibited any formal briefing Session which had been the method before.

**5.2.23** The e-mail explained the Welsh Government's Guidance including an overview of the Study and the process the Authority would be undertaking. Contact details were provided should any member have a question to raise.

### Internal Meetings

**5.2.24** Regular fortnightly meetings were held and attended by representatives from Neath Port Talbot County Borough Council's Planning Policy sat in on the Neath Port Talbot Gypsy and Traveller Forum who had responsibility for areas within the Borough where Council-run Gypsy & Traveller Sites along with access to those Gypsy and Travellers that had moved into bricks and mortar but still required access to certain support services. The purpose of these meetings were to develop and progress the project plan and allocating tasks, as well as enabling the opportunity to problem solve, where necessary.

### E-mail Communications

**5.2.25** Electronic messaging was utilised to communicate with all relevant key partners including frontline support agencies and homelessness services to make organisations aware of the Study and to request their assistance in identifying Gypsy & Traveller community members so that we could reach as many community members as possible including those in bricks and mortar housing.

**5.2.26** A number of local community support organisations providing a service to Gypsy & Traveller Communities were contacted via email throughout July, 2021 to request their help in locating any members of the Gypsy & Traveller Community who were residing in the Neath Port Talbot Borough - 'beyond' those living on established Council-run sites. Following this, the Showmen's Guild liaised with the Planning Policy Team to discuss their accommodation needs, and the Wallich were fundamental to establishing contacts for Gypsies and Travellers within Bricks and Mortar Accommodation.

### Survey Timeline

**5.2.27** Following consultation with members of the Gypsy & Traveller Project Steering Group, it was agreed that the full survey team (who would be undertaking the survey exercise) would follow the format of the questionnaire in chronological order and would only change the order that the questions were asked if it was deemed appropriate in engaging the Interviewee. It was agreed that an additional question was added to the end of the questionnaire to give respondents the opportunity to provide any other feedback about their needs.

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**5.2.28** The Survey was undertaken over a period of just over 9 weeks from the 13th July, 2021 to the 16th September, 2021 inclusive. The initial survey period was extended until the 27th of September 2021 in order to capture responses from some households who couldn't be visited due to positive Covid-19 cases. In that time, 56 face-to-face interviews were carried out with Gypsy & Traveller households - some households had to be visited more than once in order to obtain contact (and in meeting Welsh Government's Engagement Checklist). Where a face to face interview was not achievable, 9 interviews were undertaken via the telephone.

### Engagement with other Authorities

**5.2.29** Neath Port Talbot adjoins the following Local Authority areas, Bridgend, Swansea, Carmarthenshire, Powys, and Rhondda Cynon Taf (RCT). Dialogue has been undertaken with these Authorities in order to discuss the GTAA process and understand the regional context of the Gypsy and Traveller Community. Discussion was had on the type of information held by each Local Authority and agreement sought on what could be obtained and shared with others, for consistency purposes.

**5.2.30** Each Local Authority within the region has varying levels of accommodation provision and management arrangements. Carmarthenshire has the second highest number of Gypsy and Traveller pitches, with one public site and 4 private sites. Neath Port Talbot is the only Local Authority to only have public sites run by the Local Authority, with Swansea, Carmarthenshire, Powys, and RCT all having both public and private sites. There are unauthorised, but tolerated sites in RCT, Swansea and Powys and there is currently a large transit site in Powys, of approximately 100 pitches, which provides accommodation for the Gypsy and Traveller Community during the Royal Welsh Show. Aside from this transit site, there are no other transit sites in the region. The need for transit provision will be assessed by each Authority as part of their study. There are currently 3 sites for Travelling Showpeople in RCT and in Swansea. Bridgend, RCT and Neath Port Talbot all have annual fairs which see Travelling Showpeople visit their area.

**5.2.31** Bridgend has recently completed its GTAA (May 2020) and this has made site specific provision for two permanent three pitch sites but this has been contested by Welsh Government.

**5.2.32** Carmarthenshire published a GTAA in November 2019 which indicated a need for 31 pitches over their plan period. Pembrokeshire also published a GTAA in 2019 for the County including the Pembrokeshire Coast National Park which identified a need for 56 pitches over their plan period. It is believed that both authorities are awaiting approval of their GTAA's from the Welsh Government.

**5.2.33** The latest GTAA for Powys (2016) identified no future need. Rhondda Cynon Taf GTAA 2015-2020 identified a need for 4 pitches over their plan period.

**5.2.34** Swansea latest published GTAA (2015) identified a need for 29 pitches over their plan period. They are currently in the process of preparing another GTAA, the results for which were not available at the time this report was written.

**5.2.35** A number of Authorities indicated that there is likely to be a number of Gypsy and Traveller households living in bricks and mortar accommodation, however, exact numbers and the reasons for families living in this type of accommodation is unknown. In terms of community cohesion, Neath Port Talbot, Swansea and Bridgend have the Vulnerable Learner Service who work with Gypsy and Traveller families. General responses suggest at several families are well integrated into the existing community and access schools, GP services and have access to a number of support groups and networks

### List of Organisations Consulted

**5.2.36** All frontline support agencies and homelessness services working with the Local Authority were contacted as part of this consultation process.

**5.2.37** Steering Group members and their organisations were consulted by email and through organised meetings as previously stated.

**5.2.38** All other partners were consulted via email communication to inform them of the study should they wish to participate / provide input or comment, including the following organisations :

- All 6 RSL partners who hold social housing stock within the Neath Port Talbot;
- Neath Port Talbot Supporting People Team;
- Public Health Wales;
- Port Talbot Women's Aid;
- Swansea Bay Health Board;
- The Wallich;
- Thrive Women's Aid;
- Swansea City Traveller Liaison;
- South Wales Police;

### Identifying Households in Bricks and Mortar

**5.2.39** The 2011 Census indicated that there are a number of households living in conventional housing who have identified themselves within the Gypsy and Traveller ethnic group. Therefore, as part of the study, extensive engagement was undertaken to try and identify as many households living in bricks and mortar as possible.

**5.2.40** A number of organisations were consulted and engaged in the process and asked if they worked with any Gypsy and Traveller households living in bricks and mortar. The Steering Group was made up of a number of representatives who work with the community, such as social workers, health visitors and site wardens. Members of the group were asked if they were aware of any families living in bricks and mortar, and if these families could be engaged in the GTAA process and to publicise the study to these households. Contact was also made with all housing associations operating within the Neath Port Talbot Borough and the Authority's Vulnerable Learner Service. In addition, the Gypsy and Traveller Liaison Officer along with the survey team visited both sites to

## 5 . Methodology

speak to all residents, where possible, to advise them of the GTAA; during these discussions and during the interview process, residents were asked if they were aware of any friends or family living in bricks or mortar.

**5.2.41** A total of 15 families/individuals were identified as living in bricks and mortar accommodation. These families were identified through the Vulnerable Learner Service and the Wallich records. This information was cross-referenced with the site waiting lists, and Tai Tarian also looked at their social housing database as did all the other Registered Social Landlords.

**5.2.42** Due to data protection issues, organisations were unable to directly pass on names and contact details for households, and instead organisations contacted the households on the Authority's behalf. A range of consultation methods were used, including posters/flyers (Appendix A), phone calls, low key chat on site and household visits. Of the 15 families identified, 11 agreed to be interviewed, 4 were not interviewed. It was discovered that two of the households had moved away when interviews were attempted. One household was visited 3 times in an attempt to obtain an interview, however, they were not in on every attempt. Due to child safeguarding issues, it was not appropriate to undertake an interview with the other household identified in bricks and mortar. The interview log is within Appendix C.

### **"Undertaking Gypsy and Traveller Accommodation Assessments" - Engagement Checklist**

**5.2.43** In compliance with the Engagement Checklist and in demonstrating that Neath Port Talbot Council has reached as many households as viable:

**Item 1: 'Visit every Gypsy and Traveller Household identified through the data analysis process up to 3 times, if necessary'.**

**5.2.44** An 82% response rate was achieved collectively on the 3 public sites and bricks and mortar addresses within the County Borough during this Study - with some households being visited more than once to complete the interview(s).

**Item 2: 'Publish details of the GTAA process, including contact details to allow Community Members to request an interview, on the Local Authority Website (Planning and Housing), RSL Websites.**

**5.2.45** An array of communication methods were utilised including those listed within Chapter 3 'Study Methodology' as well as:

- Adverts placed on the Council Website and the Neath Port Talbot 'Housing' Website;
- Adverts placed in the reception areas of the Civic Centres;
- Posters/flyers were produced and hand delivered to every household on the three Local Authority run Gypsy & Traveller sites (Appendix A);
- Posters advertising the Study were displayed around both Local Authority run Gypsy & Traveller sites, as well as QR Codes - which could link Community members with smart phones directly to the bespoke telephone hotline and answerphone giving details where details of the Study could be found (Appendix A);

### **Item 3: 'Consult relevant Community Support Organisations'.**

Relevant Community Support Organisations listed in Annex 1 of the Welsh Government's 'Undertaking Gypsy and Traveller Accommodation Assessments - Guidance' were contacted via email to outline the Study itself and respond to any specific queries they had, as well as request their help in locating any members of the Gypsy & Traveller community who were residing in Neath Port Talbot - 'beyond' those living on established Council-run sites. Regular meetings took place with the NPT Gypsy and Traveller Forum and updates on the progress of the study was given. Members were given the opportunity to raise questions relating to the study as well as sharing this information with local Gypsy and Traveller community members that they supported, as they saw appropriate.

### **Item 4: 'Develop a Local Authority Waiting List for both pitches and housing, which is accessible and communicated to community members'.**

The Local Authority Site's waiting list is held and managed by the Gypsy and Traveller Liaison Officer and is fully accessible to the community. Housing waiting lists are also provided by all RSL's. Section 7 (Assessing Accommodation Needs) looks at the waiting list in more detail.

### **Item 5: 'Endeavour to include Gypsies and Travellers on the GTAA Steering Group'.**

**5.2.46** Gypsy and Traveller representatives (Site Wardens) were considered to be an "arm's length" part of the GTAA Steering Group and were provided with a regular update reports on the progress made within the Study. Other members of the Steering Group were able to share this information with local Gypsy and Traveller community members - as they saw fit.

### **Item 6: 'Ensure contact details provided to the Local Authority by Community Members through the Survey Process are followed up and needs assessed'.**

**5.2.47** Responses to the survey, and details passed to the survey team to be followed up through the process.

### **Item 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'.**

**5.2.48** An array of communication methods were used as described in Item 2 of this section and flyers/posters were produced and hand delivered to each individual household on the three Local Authority run Gypsy & Traveller sites - along with a copy of poster which was displayed on site explaining the study and the Welsh Government's information. New techniques using technology contained with mobile phones was tried in order to maximise awareness of the study and encourage participation. The Local Authority's Gypsy and Traveller Liaison Officer and survey team also spoke to as many households as possible at the time of hand delivering the letters to help reduce any concerns/fears over the Study.

# 5 . Methodology



### 6.1 Household Interviews

**6.1.1** In order to gather all relevant data required to assist the Local Authority in assessing the accommodation needs of the Gypsy & Traveller Community, the detailed survey (questionnaire) comprised of 6 sections entitled: A Your Home; B Your Family; C Your Plans; D Family Growth; E Transit Sites; and F Any other comments.

**6.1.2** The survey aimed to identify current households with housing needs and to assess likely future household formation from within existing households to help determine the need for future site provision(s).

#### Study Results

**6.1.3** Most of the surveys were undertaken through face-to-face interviews by the Local Authority's Survey Team (Senior Social Workers, Vulnerable Learner Service Officers, the Gypsy Liaison Officer and an Area Co-ordinator). A small number did take place over the phone as circumstances dictated. The vast majority were willing to participate as the Survey Team had explained the necessity to take part.

**6.1.4** In total, 65 completed interviews with Gypsy & Traveller Households (an 82% response rate) were achieved as part of the Gypsy and Traveller Accommodation Assessment as follows:

- 53 completed interviews were obtained from those households living on the three existing Local Authority run sites in the Cae Garw and Briton Ferry area;
- 12 interviews within Households living in bricks and mortar accommodation (One address contained two households who provided separate responses).

**6.1.5** Information from Steering Group Members working with Gypsy Traveller families in bricks and mortar Accommodation, revealed that there were a further 4 Households known to be part of the Gypsy & Traveller Community however, after contact through various communication forms including telephone, face-to-face and written letter, it was established that they had moved away, were not in or it was not appropriate to conduct an interview with them.

**6.1.6** The person responding to the survey will be referred to as the 'Respondent' (total of 65) and in questions which refer to all people in the Household, they will be referred to as 'Household Members' (total of 212).

#### Local Connection

**6.1.7** The study results reveal that 56 out of a total of 65 Respondents (86%) had a local connection with the Neath Port Talbot area (either through family or work), a further 3 Respondents (5%) stated there was no alternative pitch available, another 2 Respondents (3%) stated during their interview that they could not find a house to move into, with the one final Respondent (2%) stating personal reasons. 3 Respondents did not give a reason.

#### Length of Residence



## 6 . Survey Findings

In terms of length of residence, 44 Respondents (68%) had lived on their current site for over 5 years. This is in contrast with 2 Respondents (3%) who had been resident on the site for less and a month. The remaining data reveals 11 Respondents (17%) having been resident for a period of between 2 and 5 years, 3 Respondents (5%) resident between 1 and 2 years, 2 Respondents (3%) between 7 and 12 months, and a further 2 (3%) having been resident 1 - 6 months. 1 Respondent did not give an answer.

### Previous Residence

**6.1.8** 6 respondents (9%) indicated that they had moved within the last year. Of those 6:

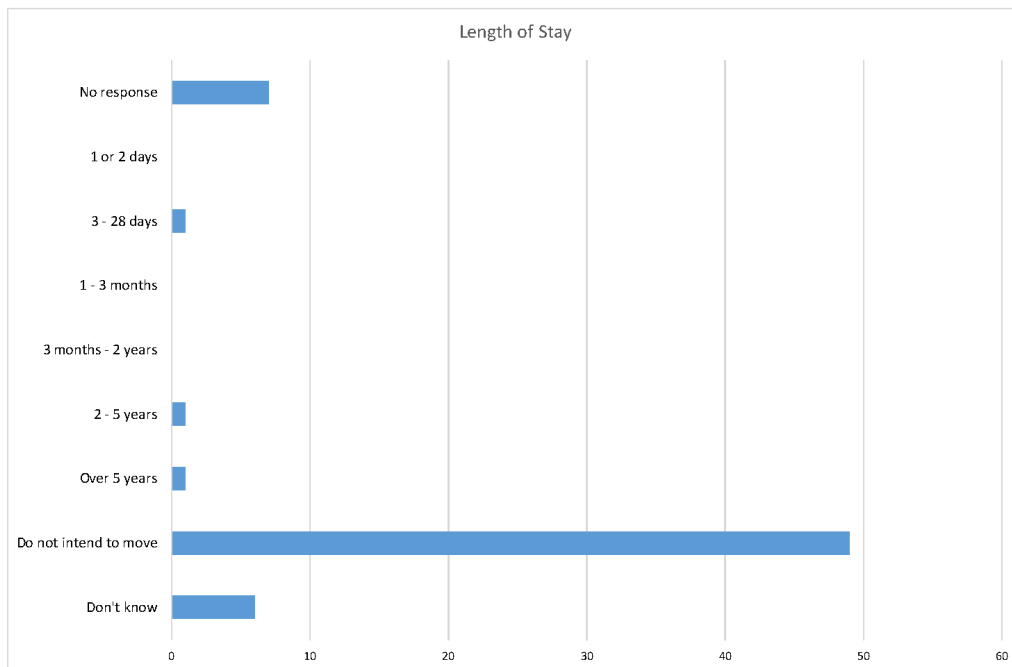
- 4 respondent indicated they were residing **within** the Neath Port Talbot Borough in a 'House' prior to entering onto the Local Authority's Authorised Site;
- 2 respondents confirmed that they had been living **outside** of the Local Authority's Borough prior to entering onto the Local Authority's Site(s);
- 4 respondents had indicated they had been living on caravan sites and therefore presumably in caravan accommodation;
- 1 respondent indicated they had been living in a house.
- 1 respondent did not indicate the type of accommodation they were living in previously.

### Length of Stay

**6.1.9** All Respondents were asked how long they planned to stay in Neath Port Talbot:

- 49 respondents (75%) stating that they were not intending to move from their existing site,
- 6 Respondents (9%) did not know how long they would stay on site,
- 1 Respondent (2%) indicated that they intended to stay for 3-28 days,
- 1 Respondent (2%) intended to stay between 2 to 5 years on site,
- 1 Respondent (2%) intended to stay over 5 years on site, and
- 7 Respondents (11%) did not give any indication as how long they intended to remain on site.

**Figure 6.1 Length of Stay**



## 6.2 Demographic Profile

**6.2.1** The Gypsy & Traveller Household Study has provided the Local Authority with a very accurate picture of the local population by establishing the family household structure including age, gender, ethnicity any any additional needs.

### Age and Gender Profile of Respondents

**6.2.2** Of the 65 Survey Respondents, 83% (54) of interviews took place with Female interviewees and 17% (11) were Male interviewees.

**6.2.3** The youngest Respondents were 18 years of age - in which there were 2; 1 Male and 1 Female. The oldest Respondent was a Male, 84 years of age.

### Household Profiling

**6.2.4** Survey data from 65 Respondents indicate a total Gypsy & Traveller Population of 212 people. When compared against the Neath Port Talbot total population Census (2011) of 139,812 the Gypsy and Traveller Population makes up less than 1% (0.08%) of the population. However, this should be taken as a caveat as we are aware of another 14 Gypsy and Traveller Households currently living on sites (10) or in bricks and mortar accommodation (4) who did not participate in the survey. The lower proportion of male household members captured by the survey is also an indication that male household members were not declared in some instances or may have been working away at the time. It is likely that there are also further bricks and mortar Gypsy and Traveller

## 6 . Survey Findings

households who are "hidden" living in society, "hidden" and unwilling to make their needs know. Therefore the population is likely to be higher than the figure of 212 we have recorded here.

**6.2.5** 2011 Census Data indicated that at the time of the Census Study, there were 125 people in Neath Port Talbot who were of Gypsy or Irish Traveller Ethnicity. However, as not all Gypsy & Travellers will indicate their ethnicity within the Census Study and therefore will go under-represented alongside the general population.

**6.2.6** 53 of 65 Respondents indicated that they had at least 1 or more family member living with them. This is in contrast to 12 Respondents who had indicated they had no other person living them, of which 10 were Female and 2 were Male.

**6.2.7** The following is a breakdown of Household size:

**Table 6.2.1 Survey Findings: Breakdown of Household Size.**

1 Person Household	2 Person Household	3 Person Household	4 Person Household	5 Person Household	6 Person Household	7 Person Household	8 Person Household
12	17	8	14	6	7	1	0

N.B. Respondent forms part of the Household make-up.

**6.2.8** Overall, 12 Respondents stated they had no other family members living with them; 17 out of 65 Respondents had a Partner living with them – either a Husband or Wife, Fiancé or Fiancée; 31 Respondents did not have a Partner living with them however did have a Son(s) and/or Daughter(s); 2 Respondents had no Partner however did have a sibling living with them.

**6.2.9** Based on the information provided by Respondents it would indicate that the average household size is 3.26 persons.

### Household Ethnicity

**6.2.10** Respondents were able to self-ascribe how they saw their identity. The purpose of this was to provide information to the Local Authority of the various cultural or ethnic groupings which exist within the local Gypsy & Traveller Population; of which may have some bearing on the eventual size and configuration of existing or future sites.

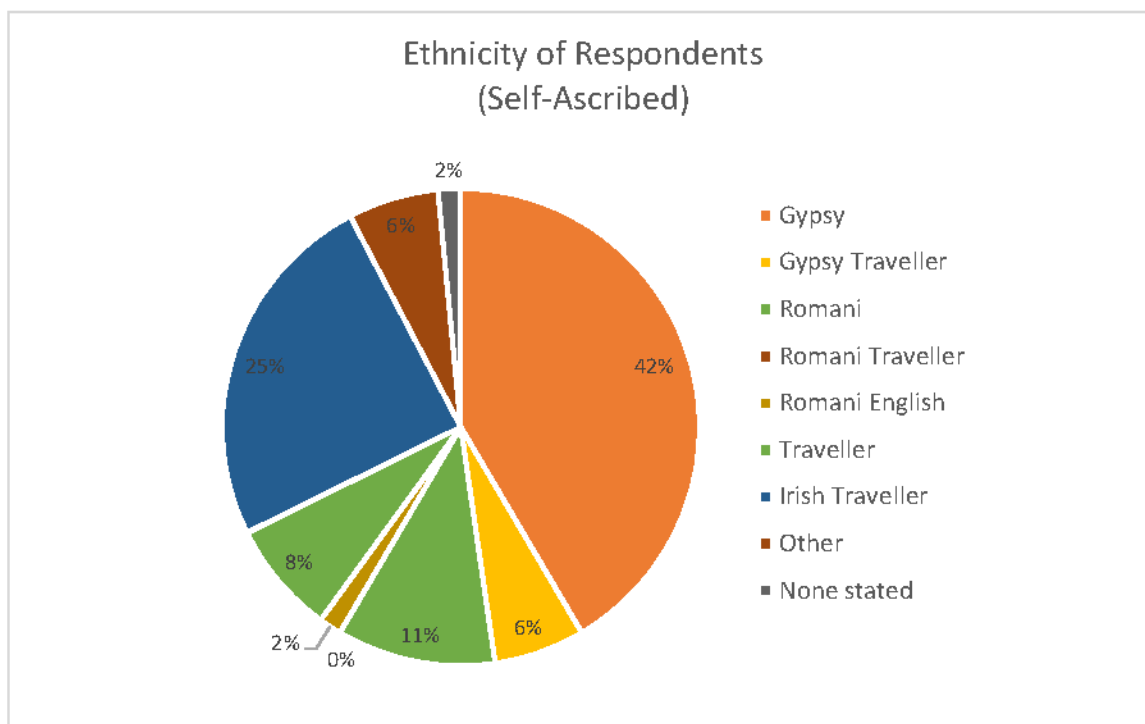
**6.2.11** All Respondents indicated their ethnicity and break down of ethnic groups as follows:

**Table 6.2.2 Ethnicity (Self-Ascribed) Table of Figures**

Respondents only	No.	%
Gypsy	27	42%
Gypsy Traveller	4	6%
Romani	7	11%
Romani Traveller	0	0%
Romani English	1	2%

Respondents only	No.	%
Traveller	5	8%
Irish Traveller	16	25%
Other	4	6%
None stated	1	2%
TOTAL	65	100%

**Figure 6.2 Ethnicity of Respondents**



**6.2.12** From both pie chart and table, it is clearly evident that the majority of Respondents 27 (or 42%) saw themselves as a Gypsy, and a further 16 Respondents (25%) saw themselves as 'Irish Traveller'. This is in contrast to 1 Respondent (2%) who saw their identity as a 'Romani English' and a further 1 Respondent (2%) who did not state any identity from the options.

### Total Household Population

**6.2.13** Respondents were also asked to self-ascribe the ethnicity/identity of their family member(s), all but 10 Interview Respondents held the same ethnicity/ identity as their Family Members (whom they were living with - ie. Romani, Irish Traveller, New Traveller, Gypsy etc).

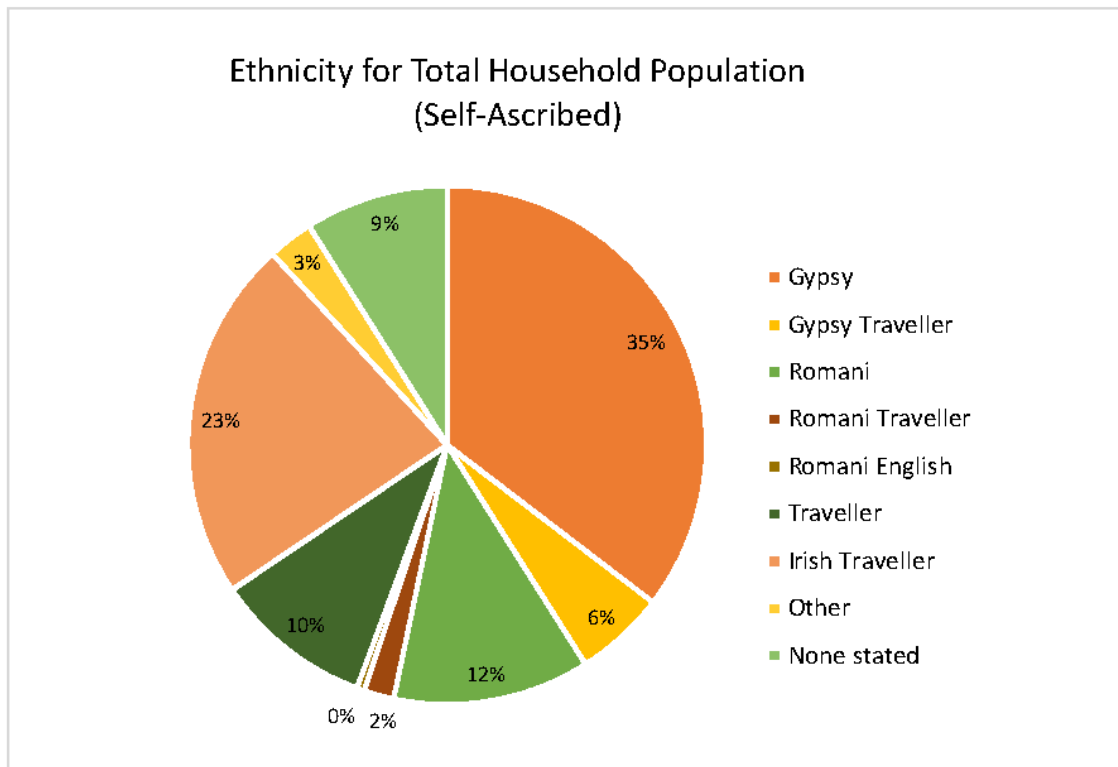
**Table 6.2.3 Ethnicity for Total Household Population (Self-Ascribed) Table of Figures**

Total Household Population	No.	%
Gypsy	75	35%
Gypsy Traveller	12	6%
Romani	26	12%
Romani Traveller	4	2%

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Total Household Population	No.	%
Romani English	1	0%
Traveller	21	10%
Irish Traveller	48	23%
Other	6	3%
None stated	19	9%
<b>TOTAL</b>	<b>212</b>	<b>100%</b>

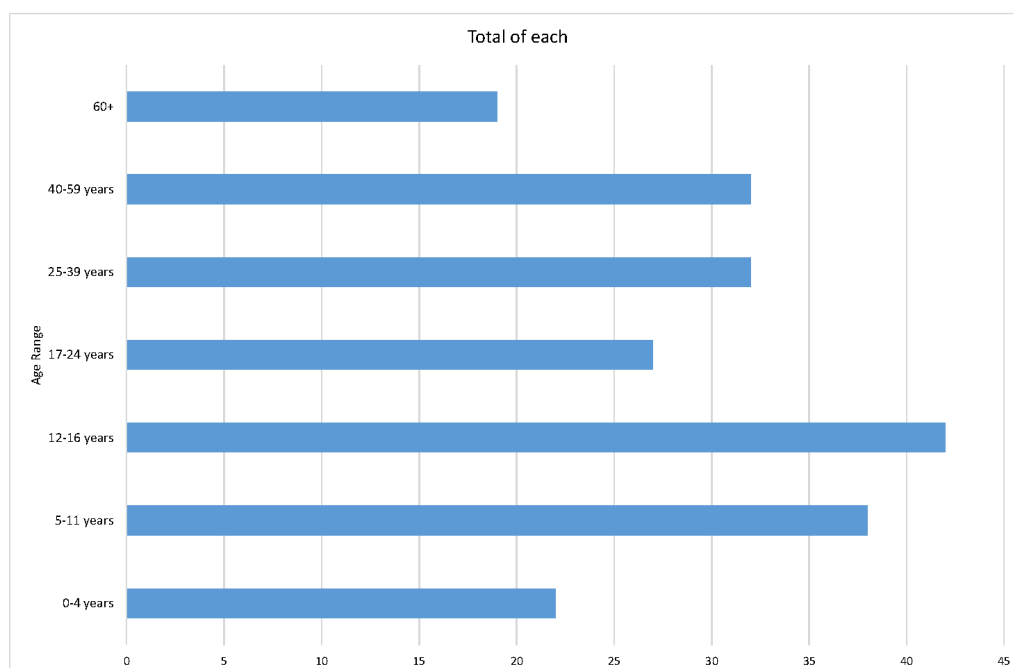
**Figure 6.3 Ethnicity for Total Household Population**



### 6.2.14 Household Age Profiling and Gender

**6.2.15** From a total population of 212, 52% were aged 17 years or over, with 42% being children 16 years or under.

**Figure 6.4 Age Range**



**6.2.16** From the bar graph it is clear that the most common age range of household members is that of children between 12 and 16 years (20%). This is in contrast to the least common age range of household members - only 9% of the Gypsy and Traveller population are over 60 years of age.

**6.2.17** The gender split of the community obtained from the study is 130 females and 82 males.

**Table 6.2.4 Gender Split of Residents**

Male	82	39%
Female	130	61%
Total Residents	212	

### 6.3 Suitability of Current Accommodation

**6.3.1** Respondents were asked if they were satisfied with their current accommodation and 35 out of 65 respondents (54%) reported during their interview that they were 'not satisfied' with their current accommodation; whilst 27 respondents (42%) were satisfied, and 3 respondents (5%) did not provide a response or preferred not to say.

## 6 . Survey Findings

**6.3.2** Those Respondents 'not satisfied' with their current accommodation were asked how their accommodation could be improved and the following suggestions/points were made (please note Respondents could state more than 1 item):

- 22 Respondents stated they felt that the kitchen and toilet blocks needed improvements;
- 2 Respondents were concerned that there were no fire hydrants on site;
- 8 Respondents raised general maintenance and repair issues.

**6.3.3** Respondents were asked details of their family structure and given the opportunity to highlight any reasons why their household/ or members of their household could not continue to occupy their current accommodation. This could include cultural aversion to a particular type of accommodation or other issues they felt should be considered by the Local Authority.

**6.3.4** Of the 35 respondents who were not satisfied with their accommodation, only 1 Respondent gave their reasons why they felt they could no longer continue to live in their current accommodation, which was because they were sharing their plot.

### Overcrowding

**6.3.5** There is no legal definition of overcrowding in the context of a mobile home. However, the Bedroom Standard, which is used within a conventional housing context can be adapted for use in these circumstances. The Bedroom Standard is defined in this guidance as requiring a separate sleeping area for each:

- a. Adult Couple (Married or Cohabiting);
- b. Any other Adult aged 16 or over;
- c. Pair of Children aged under 16 of the same sex;
- d. Pair of Children aged under 10 regardless of sex;
- e. Any other Child.

**6.3.6** Respondents were asked 'Are there enough sleeping areas for all residents?' A total of 51 responses were received, of which, 49 indicated 'Yes' and 2 indicated 'No'. The household make-up of the 2 Respondents who indicated 'No' are as follows;

1. An individual female in her 20s
2. A couple in their mid 50s

**6.3.7** Respondents were also asked if there was room on their pitch for additional trailers to prevent overcrowding and of the 2 Respondents who had indicated there was not enough sleeping areas for their family (residents) 1 indicated 'No' and 1 'Yes'. In conclusion, the couple who did not identify any children or other family members to be living with have sufficient space for additional caravans on their plot and it may be that they felt they needed more space for business needs rather than sleeping. The individual female was staying on site with a relative but wishes a plot of her own, she is therefore identified in the calculation of arising needs from overcrowding.

## Waiting List Applications

**6.3.8** Respondents were asked whether anyone in their family would like to join the Local Authority's waiting list for pitches or housing and of the 57 Respondents who answered this question, 13 (23%) confirmed that 'Yes' a family member(s) would like to join the Waiting List and 44 (77%) stated 'No'.

**6.3.9** Of those identified, none were on the Local Authority waiting list. Therefore, where addresses were provided by respondents, these have been followed up by the Authority. Some respondents did not wish to provide addresses for their family members, in such circumstances, the interviewer ensured the respondent was aware of the Authority's waiting list and the process for joining, to allow family members to place themselves on the waiting list. The Authority's waiting list is further considered in Chapter 6 (Assessing Accommodation Needs).

## 6.4 Accommodation Aspirations

**6.4.1** This area of the Survey enquires about accommodation aspirations and plans. The responses given will help the Local Authority to consider what type of accommodation is likely to be required to meet the needs of future households.

### Future Planned Moves

**6.4.2** Respondents were asked the Question 'Are you planning to move into other accommodation?' and 10 (15%) out of 65 Respondents indicated 'Yes' they were planning to move, 6 respondents (9%) preferred not to say and 5 (8%) respondents did not answer the question. The remaining 44 Respondents (68%) confirmed they were not planning to move. Of those 10 Respondents who had stated they were planning to move:

- 7 (70%) were planning to move within the Local Authority;
- 3 (30%) did not answer the question:
- No respondents said they were planning to move to another Local Authority or somewhere else in the UK.

**6.4.3** Respondents were asked 'Why are you planning to move?' and the 9 Respondents who indicated they were planning to move – gave the following reasons (please note more than 1 answer could be given):

**Table 6.4.1 Reasons given for Planning to Move**

Reasons for Moving	Total Number
Need More Space	4
Need different facilities	0
Local Connection (family or work)	2
Need to be closer to services (i.e. schools)	0
Employment Opportunities	0
Other	7



## 6 . Survey Findings

**6.4.4** The 7 Respondents who indicated 'Other' as reasons for moving, specified the following:

- Unhappy in social rented accommodation;
- Safer within own community;
- Would like a family plot;
- Need a smaller home;
- Currently sofa surfing;
- Would like option to move, but not looking to move now;
- Need own plot.

**6.4.5** Respondents were then asked 'What type of accommodation are you planning to move to?' to which the following answers were received:

**Table 6.4.2 Type of Accommodation planning to move to**

Planned Move; Type of Accommodation	Total Number
Site; Council/Social Rented	4
Site; Private Owned by Self	2
Site; Owned by Other	0
Bricks and Mortar; Owner Occupied	0
Bricks and Mortar; Rent from Housing Association	2
Bricks and Mortar; Rent from Private Landlord	1

**6.4.6** From the table above it is evident that the largest number of planned moves are to Council/ Social Rented Sites – of which all 4 of the responses were from those currently living in Bricks & Mortar Accommodation.

**6.4.7** Only 1 Respondent that was planning to move claimed to own land in the Local Authority area which could be considered as a possible future site. However, when asked if they would like to discuss their plans they did not provide any contact details and stated: 'Yes, when we are ready to look for a plot'. This respondent currently lives on a Local Authority site.

**6.4.8** The 7 Respondents who planned to move within the Local Authority all confirmed that they would be happy to live on a site managed by the Local Authority if offered an authorised pitch.

**6.4.9** When the same 7 Respondents were then asked the Question 'If an authorised pitch was available in another Local Authority, would you consider moving there?' to which 2 Respondents said 'No' and the 3rd Respondent said 'Yes' and would be willing to move to any other Local Authority but did not specify which. The other 4 respondents did not answer the question.

### 6.5 Household Growth

**6.5.1** It is intended that this section of the survey will help the Local Authority plan for the future demand of accommodation. Questions under this section relate to anticipated family growth and the needs which will arise from new households forming during the next 5 year period.

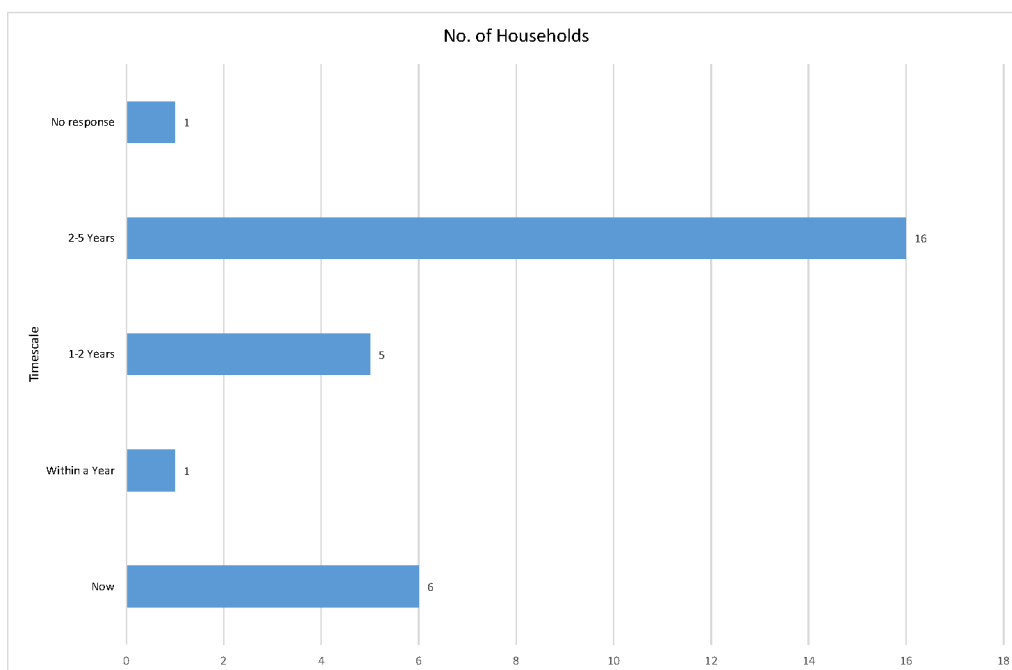
**6.5.2** Respondents were asked 'Is anyone in your household likely to want to move to their own home in the next 5 years?' to which 74% (48) replied 'No', 1 replied don't know and 2 did not provide a response. The remaining 22% (14) indicated 'Yes'.

**6.5.3** A total of 29 Households were identified by the 14 Respondents:

**6.5.4** The majority of Households were seeking accommodation on a Local Authority Site and 4 household also expressed an interest in a Private site or Bricks & Mortar accommodation.

**6.5.5** The following bar chart provides a time frame of when these newly arising households will be requiring their own accommodation:

**Figure 6.5 Timeframe of New Households Requiring Accommodation**



**6.5.6** From the bar chart it is clear that 1 of the newly formed Households (3%) will be looking to move within the next year. This is in contrast to 6 Households (21%) who would be looking to move with immediate effect. The majority of households would be looking to form/move in 2-5 years (55%).

## 6 . Survey Findings

**6.5.7** Respondents were also asked whether they had family members living outside of the area who camped in this Local Authority regularly. In total, 4 respondents indicated 'yes', 3 respondent did not answer the question, and the remaining 58 respondents indicated 'no'. The 4 respondents who answered 'yes' were then asked question D5, whether they would want to provide contact details for the family member to be interviewed. Only 1 of the 4 respondents passed contact details to the researcher. A survey response was captured from the household which contact details were provided for.

## 7 . Assessing Accommodation Needs

### 7.1 Residential Unmet Needs

**7.1.1** The information compiled in sections 3 and 5 of this report, gathered through secondary and primary data respectively, has enabled the Authority to undertake a comprehensive assessment of future need of the Gypsy and Traveller population. This chapter explores in detail the planned residential supply; the level of future need; assess the requirements for permanent residential pitches; transit provision; and sites for Travelling Showpeople.

### Current Residential Supply

**7.1.2** The first element of the calculation (which is presented in Table 7.1.2 - An Estimate of Need for Residential Site Pitches) needs to consider the existing residential supply, and the level of current occupation. There are 67 authorised Local Authority pitches, all of which have full planning consent, however, only 64 were occupied at the time of the survey being undertaken. There is one private site in Neath Port Talbot which has a personal consent for one pitch for a specific family and their dependants. Therefore the figures input in Rows A and B are 64 and 1 respectively.

### Planned Residential Supply

**7.1.3** Whilst Rows A and B provide the current residential supply, it is also important to understand the planned residential supply, such as levels of current vacancies, pitches expected to become vacant and any planned new pitch provision.

**7.1.4** Row C represents the number of vacant pitches in Neath Port Talbot. During the survey period, a total of three pitches were vacant.

**7.1.5** Row D of the calculation indicates the number of pitches that are expected to become vacant over the next year. To calculate the anticipated rate of new vacancies, the Welsh Government guidance states that site management records for the last 5 years should be reviewed and an average over that period input into Row D. Analysis of the Authority's site management records identified an annual turnover rate of 8 pitches since 2016.

**7.1.6** Using information obtained from questions A6-7 and Section C of the survey, Row D may also indicate those with aspirations to leave the site for another Local Authority area or those who wish to move into conventional housing. Responses from these questions have therefore been considered and assessed to determine whether any additional vacancies above the 8 pitches per annum from pitch turnover records can be expected.

**7.1.7** In terms of responses to Question A6, 'How long do you think you'll stay here?', the majority of Respondents (49) stated that they did not intend to move. Of the remaining 16 Respondents interviewed, 6 stated 'don't know', (of which 1 was staying on a Local Authority site and 5 were living in bricks and mortar accommodation); 1 Respondent stated 'over 5 years' (living on a Local Authority site); 1 respondent stated 2-5 years (living on a

## 7 . Assessing Accommodation Needs

Local Authority Site), and 1 respondent stated '3-28 days', (this response was from a respondent living in privately rented bricks and mortar accommodation). 7 respondents did not answer this question.

**7.1.8** Responses to Question A2 indicate that 35 Respondents are not satisfied with their current accommodation, of which 27 were Local Authority site residents, and 7 were in bricks and mortar accommodation. The Authority will continue regular dialogue with residents and will, where possible, continue to make adaptations and improvements to sites and pitches. However, it should be noted that some responses indicated amenity blocks were too small and meeting these accommodation aspirations would be more difficult for the Authority, particularly at Wharf Road where there is limited space for expansion of plots. Feedback received from those in socially rented bricks & mortar accommodation will be fed back to the relevant RSL.

**7.1.9** Referring to responses to Section C, 10 Respondents indicated that they intended to move to alternative accommodation. The majority of these respondents (8) were living in Bricks & Mortar accommodation. Whilst these responses suggest there is 1 permanent site resident that is considering alternative accommodation, the Authority is unable to demonstrate that these households will definitely secure alternative accommodation over the next 5 years. 1 respondent was staying on a site and has been factored into the calculation of arising need as a result of overcrowding.

**7.1.10** The responses to Sections A and C, therefore, indicate to the Authority that there are households considering alternative accommodation, however, as no meaningful conclusions can be drawn from this information, a '0' figure has been attributed and if these residents do secure alternative accommodation, it is envisaged they would be included within the anticipated annual turnover rate of 8 pitches.

**7.1.11** Row E indicates the total number of new local authority and private pitches with planning permission. Currently, there are no un-developed pitches with planning consent, therefore 0 has been attributed to Row E.

### Current Residential Demand

**7.1.12** The information obtained through the survey and other data sources provide sufficient detail to accurately assess the level of current residential demand. When reviewing and analysing responses, it is important that the distinction between need and demand/ preference is fully understood to ensure those who are in 'need' have their needs adequately assessed through this process. Paragraphs 166-170 of the guidance(4) considers that the three main areas when considering the distinction between needs and preferences include:

- i) assessing cultural aversion in conventional housing;
- ii) community members who claim a need for mobile home pitches in a different Local Authority area than the one undertaking the assessment; and
- iii) those on unauthorised sites.

**7.1.13** This has been considered in further detail below.

## 7 . Assessing Accommodation Needs

**7.1.14** Rows F and G should contain the number of unauthorised encampments and unauthorised developments. There were no known unauthorised encampments or developments during the survey period, a figure of '0' has therefore been attributed to both Rows.

**7.1.15** Row H assesses the residential demand from overcrowding within existing households, and should include those where there is insufficient space for family members within its mobile home accommodation and insufficient space available on their pitch to safely station an additional mobile home. A total of 2 Respondents indicated that there were not enough sleeping areas for all family members, with 1 of these households stating that there was sufficient room for additional trailers on their pitch. The remaining 1 household stated there was insufficient space to accommodate an additional trailer or mobile home, a figure of 1 has therefore been attributed to Row H.

**7.1.16** Row I is the count of those in conventional housing who display a need for a pitch, which will include:

- i) those with a cultural aversion to conventional housing:
- ii) those experiencing overcrowding or
- iii) those who have reached adulthood and want to move out of the family home and live on a site.

**7.1.17** There were 12 interviews undertaken with families in bricks and mortar, and from these interviews, whilst 7 respondents expressed a desire to move onto a site, there were no signs of cultural aversion, with many having lived in their current accommodation for more than 5 years. Furthermore, none of the households who expressed a preference to move to a site are currently on the waiting list for pitches which doesn't confirm a need to move to a site.

**7.1.18** The survey identified 10 households currently living in bricks and mortar accommodation who would like to move to their own home in the next 5 years. 5 of whom would exclusively like Local Authority Site accommodation, 2 of whom would like Local Authority or Private Site or Bricks & Mortar Housing Accommodation and 3 of whom did not specify the type of accommodation they would like. Given that the respondents to the survey from Bricks & Mortar Accommodation did not demonstrate a cultural aversion to housing, there is potential that the newly arising households (children) may also wish to live and establish a home in Bricks & Mortar Accommodation. Apart from the 1 households who is suffering overcrowding explained below, none of the other anticipated newly forming households identified through the survey had reached adulthood and have therefore not been identified in Row I.

**7.1.19** One household in bricks and mortar accommodation was currently living with their parents household who also responded to the survey. This relatively new family household is therefore experiencing overcrowding constitutes a need of 1 pitch and has been included within Row I.

**7.1.20** Row J should feature anticipated demand from new households expected to arrive, and is derived from an analysis of current waiting lists, caravan count or partnership working with other Local Authorities. There are currently two separate waiting lists held, one for

## 7 . Assessing Accommodation Needs

Cae Garw and one for Wharf Road, with households able to place their name on both lists if they so wish. From a review of the waiting lists, there are a number of families currently on the Wharf Road waiting list who already live on the site with their parents and are looking to establish their own households in the future. Three of these households are under the age of 18, they have not yet reached adulthood and would not be able to take on a tenancy. These 3 households have been discounted from the calculation from the waiting list for the purpose of assessing Row J, as it is not an actual 'current' need. After discounting these 3 households, there is currently 4 households on the lists, all of whom are currently living on authorised pitches at either the new or old Wharf Road sites, Briton Ferry. A figure of 4 has therefore been attributed to Row J.

### Future Household Growth

**7.1.21** It is widely suggested that the rate of household growth within the Gypsy and Traveller community is greater than that of the wider settled community, this is generally due to factors such as the relative youthfulness of the population, higher birth rates and younger fertility age. Whilst we can generally assume the rate of household formation will be higher, it is important that household formation rates applied to local Gypsy and Traveller communities are based on robust local evidence and provide an up to date assessment. The Welsh Government Guidance states that Authorities should analyse the demographic data provided by community members and based on data compiled within previous Gypsy and Traveller assessments, the Welsh Government suggest a growth range of 1.5-3% per annum.(5)

**7.1.22** In 2003, a study on behalf of the Office of the Deputy Prime Minister (6) suggested a household growth rate of 2-3% is appropriate when projecting future formations. On this basis, a figure of 3% has been widely used in assessments since publication of the study, even though the study suggests that individual assessments should use local evidence for future household formation rates.

**7.1.23** In 2013, Opinion Research Services (ORS), within their 'Household Formation Rates for Gypsies and Travellers' Technical Note, suggested that there is little statistical evidence to support a rate of 3%, stating, 'A growth rate of 3% has been commonly used in assessments, but no statistical evidence exists to support households growing this quickly'. (7) Based on their modelling of the population, ORS state the rate of population growth may be as low as 1.25% and the formation rate between 1.5% and 2.5% per annum, with a 3% growth rate only applying in exceptional circumstances and would require clear justification and statistical support before being used, concluding, 'Therefore, a household growth figure not far in excess of 1.25% per annum is plausible and a 3% is highly implausible'.(8)

**7.1.24** ORS have, more recently, released a further Technical Note providing additional analysis from the 2013 Technical Note stating, 'Even using extreme and unrealistic assumptions, it is hard to find evidence that new Gypsy and Traveller population and household growth rates are above 2% per annum nationally. The often assumed 3% per annum net household growth rate is unrealistic and would require clear statistical evidence before being used for planning purposes'.(9)



## 7 . Assessing Accommodation Needs

**7.1.25** Section D of the questionnaire suggests that 29 households will require a pitch within the next 5 year period, which represents a 9.21% gross growth per annum:

**7.1.26**  $29/5 \text{ years} = 5.8 \text{ pitches}$

**7.1.27**  $5.8 \text{ pitches divided by existing households (63), } 5.8 / 63 \times 100 = 9.21\%$ .

**7.1.28** Within the context of published research and the range suggested by the Welsh Government guidance, the Authority considers a growth rate in excess of 3% to be unrealistic, and has therefore explored the appropriate level of growth in Neath Port Talbot in an alternative way.

**7.1.29** Household Growth in Neath Port Talbot

**7.1.30** When assessing household formation rates, it is important to consider not only the level of new household formation, but the loss of any households through dissolutions. Whilst the Welsh Government guidance (10) states that dissolution of households should be included within row D of the calculation, row D only features the pitch turnover data for a one year period. If migration and dissolutions are not considered for the remainder of the 5 year period, then the assessment of household formations would only be focusing on growth in households and would not consider losses.

**7.1.31** This would result in a gross household formation rate, rather than net household formation rate, which would be artificially inflated. To achieve an accurate household formation rate, a reduction in the number of households due to dissolutions, movements out of the area and transfers into other forms of housing need to be considered. Indeed, ORS have stated, '*...It is a matter of concern that many Gypsy and Traveller accommodation needs assessments have not distinguished gross and net growth rates nor provided evidence for their assumed rates of household increase. These deficiencies are particularly important because when assumed growth rates are unrealistically high, and are compounded over a number of planning years, they can yield exaggerated projections of accommodation needs and misdirect public policy*'.(11) On this basis, the Authority further looked into other demographic components of the survey, not focusing on section D in isolation.

**7.1.32** The results from Section D of the survey indicate the gross household formation (family growth), this gross growth needs to be off set against the dissolution of households to provide a net household formation rate. ORS further state, '*...the gross rate if household growth is moderated by reductions in households through dissolution and/or by households moving into bricks and mortar housing or moving to other areas. In other words, even if 3% is plausible as a gross rate, it is subject to moderation through such reductions in households through dissolution or moves. It is the resulting net household growth rate that matters for planning purposes in assessing future accommodation needs*'.(12)

**7.1.33** In terms of migration, ORS (13) have looked at the levels of migration within the Gypsy and Traveller community. The research found that there is little evidence of international migration, but in relation to local migration, there are often movements between Local Authorities, generally with each case finding that in-migration to one area



## 7 . Assessing Accommodation Needs

is matched by out-migration from another area. On this basis a nil migration to/from an area is assumed by ORS, and in the absence of any plausible data, the Authority has also used a nil migration based on the conclusions by ORS. Transfers to other forms of housing, such as bricks and mortar can also have an impact the household formation rate, however, there is no statistical data to suggest at what rate this may occur and therefore no allowance has been made for this.

**7.1.34** Considering the level of dissolutions, a study by Parry et al (2004) (14) , found Gypsies and Travellers are less likely than average to live beyond 68 to 70 years, 10-12 years lower than the life expectancy across the whole population of the UK. ORS assume an average life expectancy of 72 years within their modelling, to provide a more cautious approach than the study by Parry et al. In our analysis, we have followed the approach by ORS and assumed 72 years as the life expectancy rate to provide a degree of caution.

**7.1.35** When the age profile of the community, from the survey findings, is compared to results from the 2011 census, there are a higher proportion of Gypsy and Traveller residents aged over 65 years old in Neath Port Talbot than the average for the Gypsy and Traveller population in England and Wales, as illustrated in the following table:

**Table 7.1.1 Age Profile of Residents aged 65 and above**

Age Range	Number (NPT 2011 Census)	Number (NPT 2011 Survey)	Percentage (NPT 2011 Census)	Percentage (NPT 2021 Survey)	Average England and Wales (2011 Census)
65-69	4	3	2.11%	1.42%	2.00%
70-74	6	2	3.16%	0.94%	2.00%
75-79	4	8	2.11%	3.77%	1.00%
80-84	1	5	0.53%	2.36%	0.50%
85+	0	0	0.00%	0.00%	0.50%
Total 65+	15	18	7.89%	8.49%	6.00%
Total Population	190	212	100%	100%	100%

**7.1.36** Based on the survey results, 16 residents will be over 72 years old by the end of the 5 year study period, with a total of 8 households where all persons within the household would be aged 72 and over (3 are single person households and 5 households with 2 members). If all households dissolve over the period, the annual rate would be 1.6 pitches per year.

### Net Household Growth Rate

**7.1.37** To achieve a net household growth rate, the evidenced dissolution rate should be off set against the maximum gross household growth rate suggested by nationally recognised guidance and research. Therefore if the dissolution rate (1.6) is taken away from the maximum gross household growth rate (3), a net households growth rate of 1.4% is identified.

**7.1.38** This is further supported by an analysis of the average growth of all caravans over a 5 year period 2016-2021. According to the caravan count, the total number of caravans identified in Neath Port Talbot has fluctuated significantly at the 6 monthly intervals which the count is undertaken. Whilst it is recognised that not all caravans are occupied by Gypsy & Traveller households, it provides an indication of the changing numbers of transient households. The total net % change over the 5 year period is 7%, divided by 5 gives an average annual change of 1.41%.

**7.1.39** Stakeholder engagement undertaken through the Gypsy & Traveller Steering group highlighted anecdotal evidence of new household formation trends. Community representatives confirmed that many Gypsy & Traveller families do not automatically expect that their children will form new households within their childhood sites when they reach adulthood. It is also accepted that often the female in a new relationship will move to reside at their partner's site. This provides additional justification as to why it would be inappropriate to apply an annual household growth rate towards the higher end of the nationally accepted growth rate (2-3%).

**7.1.40** A household growth rate of 1.4% is well within the latest available guidance and research of what an appropriate rate should be of between 1.25% and 2.25%. The Authority therefore concludes that a net household growth rate of 1.4% is appropriate for the area as it is based on robust local evidence, and therefore is fully compliant with the Welsh Government guidance.

### An Estimate of Need for Residential Site Pitches in Neath Port Talbot

**7.1.41** Using the information collated above, the following table assesses the need for Gypsy and Traveller pitches in Neath Port Talbot over the next 5 years, and for the Plan period (up to 2036).

Table 7.1.2

Row	Current residential supply	Number of Pitches
A.	Occupied Local Authority pitches	64
B.	Occupied authorised private pitches	1
	Total	65

## 7 . Assessing Accommodation Needs

**Table 7.1.3**

	<b>Planned residential supply</b>	<b>Number of Pitches</b>
C.	Vacant Local Authority Pitches and available vacant private pitches	3
D.	Pitches expected to become vacant in near future (see note 1)	8
E.	New Local Authority and private pitches with planning permission	0
	<b>Total</b>	<b>11</b>

**Table 7.1.4**

	<b>Current residential demand</b>	<b>Pitch Demand</b>
F.	Unauthorised encampments	0
G.	unauthorised developments	0
H.	Overcrowded pitches (see note 2)	1
I.	Conventional housing (see note 3)	1
J.	New households to arrive (see note 4)	4
	<b>Total</b>	<b>6</b>

**Table 7.1.5**

	<b>Current Households (see note 7)</b>	<b>Future Households (at year 5)</b>	<b>Future Households (Plan period)</b>
K.	63	68	78
L.	Additional household pitch need	5	15

**Table 7.1.6**

	<b>Unmet Need</b>	<b>Need arising</b>	<b>Need accommodated</b>
M.	Current residential demand	6	
N.	Future residential demand (5 year)	5	
O.	Future residential demand (plan period)	15	
P.	Planned residential supply		11

## 7 . Assessing Accommodation Needs

	Unmet Need	Need arising	Need accommodated
Q.	Unmet need (5 year)	0	itches
R.	Unmet need (plan period)	10	itches

### Travelling Showpeople

**7.1.42** As part of the GTAA process, the Showman's Guild were contacted by the Authority to obtain a representative view of Travelling Show Peoples accommodation needs within the County.

**7.1.43** The Guild have previously built up good relations with the Authority and have a long standing connection with the area through the annual Fairs. Outside of visiting the area for annual Fairs, there are no permanent Travelling Showpeople residing in Neath Port Talbot and there is no history of regularly residing in or resorting to the area for their accommodation needs. The Guild confirmed through telephone and email correspondence that they did not wish to participate in our survey and that a residential site and/or winter quarters is not needed within Neath Port Talbot.

**7.1.44** We are aware that households from the Travelling Show People community who visit Neath Port Talbot to operate fairs resort to / reside within the City & County of Swansea and commute into Neath Port Talbot when fairs are in operation. Liaison with Swansea Council officers also confirmed that a need for provision for Travelling Show People is likely to be identified within their forthcoming GTAA.

**7.1.45** As Guild members do not regularly reside or resort in Neath Port Talbot, and in the absence of interviews, no need has been identified through the GTAA process.

### 7.2 Transit Unmet Needs

**7.2.1** This Section of the Survey addresses the issue of the need for transit provision in the area and other Local Authority areas. It will help the Local Authority to understand whether there is a need for transit site accommodation in the area.

**7.2.2** Respondents were asked the Question 'Have you camped by the roadside/ on an unauthorised encampment/ on a transit site in Wales while travelling in the past year?' – to which 56 (86%) of Respondents replied 'No' and 4 Respondents (6%) claimed 'Yes' they had camped. 5 respondents (8%) did not answer this question.

**7.2.3** Of the 4 respondents who confirmed they had camped, 2 respondents did not answer where, 1 respondent preferred not to say where, and the remaining 1 respondent explained they had camped in various places in the UK, the last time being in Yorkshire about 6 months ago.

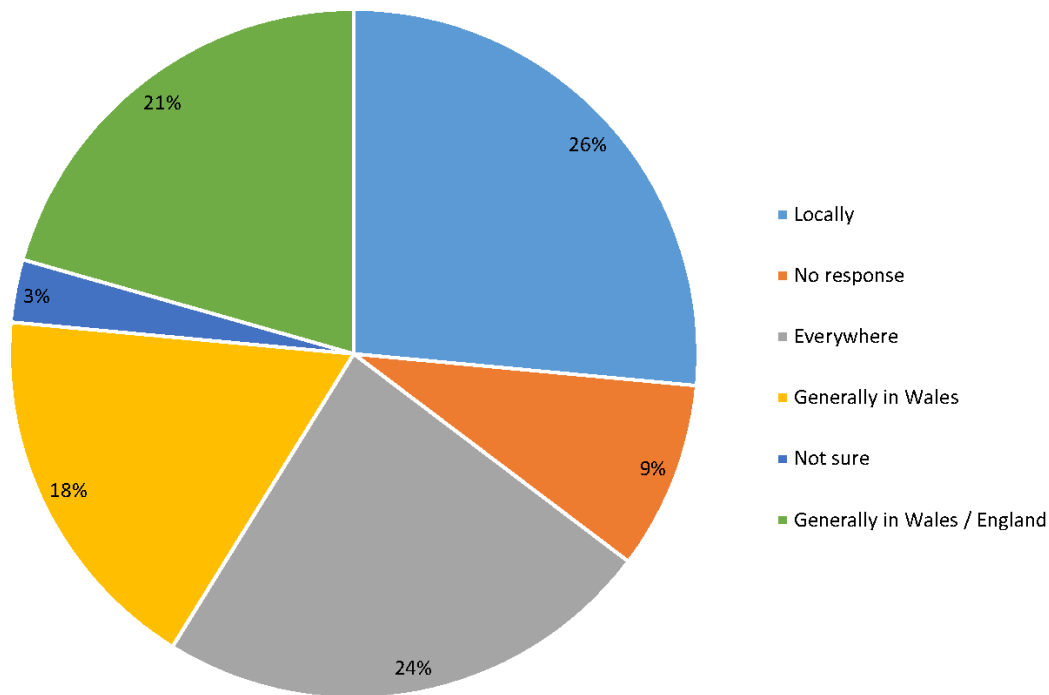
**7.2.4** In terms of length of stay in one place, 2 respondents answered 1-3 months, 1 respondent answered 2weeks-1month and the remaining respondent answered 1-2 weeks.

## 7 . Assessing Accommodation Needs

**7.2.5** From the responses to Question E1, it is evident that there has been very limited travel movements of Neath Port Talbot's Gypsy and Traveller population over the past year. As at least 86% of households have not travelled, it would suggest that the community is relatively settled, with little indication of regular travelling movements, and no confirmed evidence of travelling within the County or Wales.

**7.2.6** Question E4 asks respondents 'Do you think there is a need for more transit sites in Wales?' to which 42% (27) stated 'No' and 52% (34) stated 'Yes' with a further 6% providing no response to this question. Of those 34 Respondents who stated 'Yes' , the survey then asked where they were needed, responses are illustrated below.

Figure 7.1 Transit Site needs



**7.2.7** Of the 34 responses, 18% (6) felt that Transit Sites were required 'generally in Wales', 21% (7) stated 'generally in Wales / England' and 26% of Respondents (9) felt that Transit Sites were required 'locally'. Whilst 52% of households stated they think there is a need for more transit provision in Wales, none identified a specific other local authority in Wales. Two respondents suggested that a transit site is needed in Briton Ferry for visiting families.

**7.2.8** Whilst we can conclude that there is a general presumption for further transit pitches in Wales, no meaningful conclusions can be drawn from the data obtained from the survey over possible locations for a Transit site.

**7.2.9** Furthermore, liaison with Swansea Council officers confirmed that respondents to their questionnaire survey had identified a need for transit provision within Swansea to accommodate visiting families, and that this will be addressed in their forthcoming GTAA.

## 7 . Assessing Accommodation Needs

It is anticipated that any future transit site provision within Swansea or the region will also help to reduce the number of unauthorised encampments within Neath Port Talbot in the future.

# 7 . Assessing Accommodation Needs

**8.0.1** The calculation setting out the estimate of need for residential site pitches is contained within Table 7.1.1. It concludes that in the next five year period, the need for new pitches in Neath Port Talbot is a figure of 0.

**8.0.2** The longer term need to be met over the remainder of the plan period up to 2036 is an additional 10 pitches. The authority will consider ways of making provision to meet this identified future need through the preparation of the Neath Port Talbot Replacement Local Development Plan 2021-2036. Initially this will involve undertaking a call for candidate sites to include potential Gypsy & traveller sites in March-May 2022. In addition, the county's identified needs will also be taken into consideration when assessing the accommodation needs of Gypsies and Travellers across the South West Wales Region through the preparation of a Strategy Development Plan by the South West Wales Corporate Joint Committee, a process which is due to commence formally in February 2022.

**8.0.3** With regard to Transit Sites and Temporary Stopping Places, from reviewing the responses from the survey findings and the absence of any need identified for Neath Port Talbot by neighbouring Local Authorities, there is no clear evidence to accurately support or justify development of any transit provision within Neath Port Talbot.

### Next Steps

### Monitoring

**8.0.4** Following the adoption of the LDP, the Council has a statutory obligation under Section 61 of the Planning and Compulsory Purchase Act 2004 to keep all matters under review that are expected to affect the development of its area. Monitoring is a crucial part of the development process, providing a key mechanism for developing a fuller understanding of the issues that impact upon communities and the extent to which existing policies are meeting their stated objectives.

**8.0.5** In accordance with Regulation 37 of the Town and Country Planning (Local Development Plan) (Wales) (Amendment) Regulations 2015, the Authority is required to prepare an Annual Monitoring Report (AMR) covering the preceding financial year from 1 April to 31 March. It must be submitted to the Welsh Government by 31 October each year and published on the Authority's website.

**8.0.6** The current LDP was adopted on 27 January 2016, and the Authority has subsequently prepared and submitted 5 AMRs in 2017, 2018, 2019, 2020 & 2021 which are summarised in section xxx. The 2019 AMR triggered a review of the current LDP and a Review Report was published in July 2020 setting out the issues to be addressed. The plan review and policy development will be underpinned by the findings in the monitoring framework.

**8.0.7** The LDP Monitoring Framework contains a number of indicators specifically relating to the Gypsy and Traveller Community that will be kept under review. These include:

- The number of additional pitches provided at Cae Garw;



## 8 . Conclusions

- The number of proposals for Gypsy and Traveller sites permitted annually;
- The number of unauthorised Gypsy and Traveller encampments reported annually;
- The need for additional Gypsy and Traveller provision as identified within a GTAA.

**8.0.8** Each of the above indicators will continue to be monitored on an annual basis and reported to the Welsh Government through the AMR. The AMR will ensure that the Gypsy and Traveller provision identified within the LDP and required by any subsequent GTAAs is provided and will allow any potential changes, such as an increased need for pitches or an increase of unauthorised encampments to be monitored, reported annually and if necessary addressed through a review of the Plan.

### Timescales for Updating the LDP

**8.0.9** Once the Authority receives confirmation from the Welsh Ministers that the GTAA has been approved, the Study findings will be incorporated into the preparation of a Replacement Local Development Plan 2021-2036. The proposed timetable for the preparation of the RLDP is set out below:

**Table 8.0.1 Table detailing the stages of RLDP preparation**

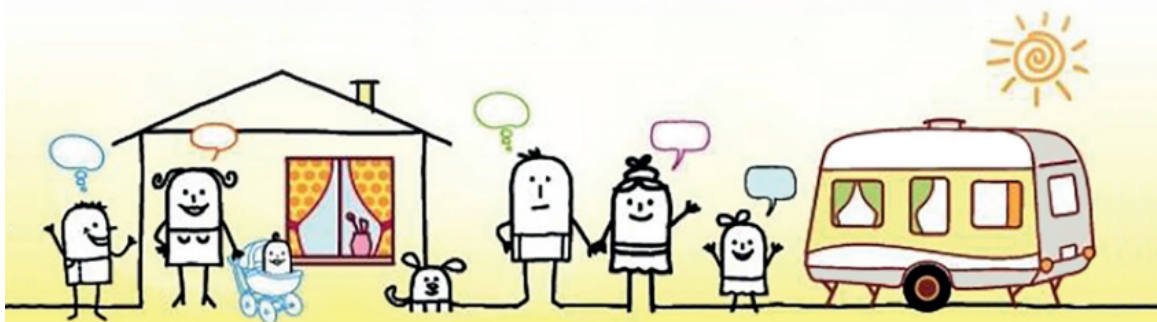
Key Stage	Stage of RLDP Preparation	Timescale
<b>Definitive Stages</b>		
1	Delivery Agreement	January 2022
2	Pre-Deposit Participation / Preparation (Regulation 14)	January 2022 - November 2023
	Call for Candidate Sites	March 2022 - May 2022
3	Pre-Deposit (Preferred Strategy) Consultation – (Regulation 15)	March 2023 - April 2023
4	Deposit Participation/ Preparation	August 2023 - February 2024
	Deposit RLDP Consultation (Regulation 17)	March 2024 - April 2024
<b>Indicative Timetable</b>		
5	Submission of RLDP to WG for examination (Regulation 22)	October 2024
6	Independent Examination (Regulation 23)	December 2024 - February 2025
7	Receipt & Publication of the Inspector's Report (Regulation 24)	May 2025
8	Adoption of the RLDP (Regulation 25)	July 2025
9	Monitoring and Review	April 2026

GYPSY & TRAVELLER SURVEY

# Are you part of the Gypsy Traveller Community?

Neath Port Talbot Council are carrying out a Gypsy Traveller Accommodation Needs Assessment (GTAA) 2022.

The survey will take place between the 13th July and 16th September 2021.



To take part in our survey, please go here:  
[www.npt.gov.uk/ldplatestnews](http://www.npt.gov.uk/ldplatestnews)

or contact the council on **01639 686010**



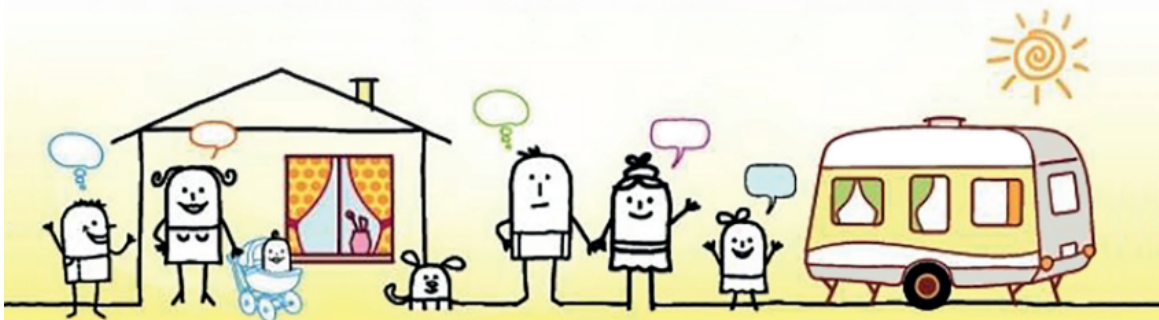
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Neath Port Talbot Council

AROLWG AR SIPSIWN A THEITHWYR

# Ydych chi'n aelod o Gymuned y Sipsiwn a'r Teithwyr?

Mae Cyngor Castell Nedd Port Talbot yn cynnal  
Aseiad o Anghenion Llety Sipsiwn a'r Teithwyr  
(GTAA) 2022.

Bydd yr arolwg hwn yn cael ei gynnal rhwng  
13eg Gorffennaf ac 16eg Medi 2021.



Os carech chi gymryd rhan yn ein harolwg,  
ewch i: [www.npt.gov.uk/cdllnewyddiondiweddaraf](http://www.npt.gov.uk/cdllnewyddiondiweddaraf)  
neu cysylltwch â'r cyngor ar **01639 686010**



Cyngor Castell-nedd Port Talbot  
Neath Port Talbot Council

**Table B.0.1 Definitions of key terms and concepts in this guidance**

Gypsies and Travellers	<p>a. Persons of a nomadic habit of life, whatever their race or origin, including:</p> <ol style="list-style-type: none"> <li>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</li> <li>1. Members of an organized group of travelling show people or circus people (whether or not travelling together as such); and</li> </ol> <p>b. All other persons with a cultural tradition of nomadism or of living in a mobile home. (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. 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. 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. 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>

## Appendix B: . Glossary of Terms

Current residential supply	The number of authorised pitches which are available and occupied within the Local Authority or partnership area. This includes pitches on Local Authority or private sites.
Current residential demand	Those with a need for authorised pitches for a range of reasons, including: <ul style="list-style-type: none"><li>• an inability to secure an authorised pitch leading to occupation of unauthorised encampments;</li><li>• an inability to secure correct planning permission for an unauthorised development;</li><li>• households living in overcrowded conditions and want a pitch;</li><li>• households in conventional housing demonstrating cultural aversion;</li><li>• new households expected to arrive from elsewhere.</li></ul>
Future residential demand	The expected level of new household formation which will generate additional demand within the 5 year period of the accommodation assessment and longer LDP period.
Overall residential pitch need	The ultimate calculation of unmet accommodation need, which must be identified through the Gypsy and Traveller accommodation assessment process. This figure can be found by adding the immediate residential need to the future residential demand. The overall residential need will capture the needs across the 5 year period within which the accommodation assessment is considered to be robust.
Planned residential pitch supply	The number of authorised pitches which are vacant and available to rent on Local Authority or private sites. It also includes pitches which will be vacated in the near future by households moving to conventional housing or in other circumstances. Additional pitches which are due to open on private sites likely to achieve planning permission shortly should be included as planned residential supply.
Household	In this guidance this refers to individuals from the same family who live together on a single pitch / house / encampment.
Concealed or "doubled-up" household	This may include adult children who have been unable to move home or different households occupying a single pitch.
Household growth	In this document household growth is defined by the number of new households arising from households which are already accommodated in the area.

Table C.0.1 Interview Log

ID	Location	Plot No.	Interview Technique	Interview Attempt 1	Interview Attempt 2	Interview Attempt 3	Questionnaire Completed or Refused	Questionnaire Received
14	Briton Ferry New	Plot 1	In person	11.08.21			Yes	Yes
15	Briton Ferry New	Plot 2	In person	26.07.21			Yes	Yes
16	Briton Ferry New	Plot 3	In person	11.08.21			Yes	Yes
66	Briton Ferry New	Plot 4	In person	09.11.21			Yes	Yes
17	Briton Ferry New	Plot 5	In person	26.07.21			Yes	Yes
18	Briton Ferry New	Plot 6	In person	26.07.21			Yes	Yes
19	Briton Ferry New	Plot 7	telephone	07.09.21	28.09.21		Yes	Yes
20	Briton Ferry New	Plot 8	telephone	07.09.21			Yes	Yes
21	Briton Ferry New	Plot 9	In person	03.08.21	11.08.21		Yes	Yes
22	Briton Ferry New	Plot 10	In person	03.08.21	11.08.21		Yes	Yes
	Briton Ferry New	Plot 11	In person	27.07.21			Vacant	N/A
23	Briton Ferry New	Plot 12	In person	27.07.21			Yes	Yes
24	Briton Ferry New	Plot 13	In person	26.07.21			Yes	Yes
25	Briton Ferry New	Plot 14	In person	25.08.21			Yes	Yes

## Appendix C: . Interview Log

26	Briton Ferry New	Plot 15	In person	25.08.21			Yes	Yes
27	Briton Ferry New	Plot 16	In person	18.08.21			Yes	Yes
28	Briton Ferry New	Plot 17	In person	11.08.21			Yes	Yes
29	Briton Ferry New	Plot 18	In person	11.08.21			Yes	Yes
30	Briton Ferry New	Plot 19	In person	13.07.21			Yes	Yes
31	Briton Ferry New	Plot 20	In person	18.08.21			Yes	Yes
33	Briton Ferry New	Plot 21	In person	16.08.21			Yes	Yes
32	Briton Ferry New	Plot 22	In person	11.08.21			Yes	Yes
7	Briton Ferry Old	Plot 1	In person	26.07.21			Yes	Yes
4	Briton Ferry Old	Plot 2	In person	26.07.21	14.09.21		Yes	Yes
3	Briton Ferry Old	Plot 3	In person	26.07.21			Yes	Yes
5	Briton Ferry Old	Plot 4	In person	26.07.21			Yes	Yes
2	Briton Ferry Old	Plot 5	In person	26.07.21			Yes	Yes
1	Briton Ferry Old	Plot 6	In person	26.07.21			Yes	Yes
6	Briton Ferry Old	Plot 7	In person	26.07.21			Yes	Yes
40	Cae Garw	Plot 1	In person	28.07.21			Yes	Yes

## Appendix C: . Interview Log

	Cae Garw	Plot 2	In person	28.07.21			Vacant	N/A
	Cae Garw	Plot 3	In person	28.07.21			Vacant	N/A
41	Cae Garw	Plot 4	In person	13.07.21	28.07.21		Yes	Yes
43	Cae Garw	Plot 5	In person	01.09.21			Yes	Yes
	Cae Garw	Plot 6	In person	14.09.21			Refused	N/A
44	Cae Garw	Plot 7	In person	10.08.21			Yes	Yes
	Cae Garw	Plot 8	In person	13.09.21			Refused	N/A
45	Cae Garw	Plot 9	In person	01.09.21			Yes	Yes
46	Cae Garw	Plot 10	In person	11.08.21			Yes	Yes
47	Cae Garw	Plot 11	In person	10.08.21	13.09.21		Yes	Yes
48	Cae Garw	Plot 12	In person	10.08.21			Yes	Yes
	Cae Garw	Plot 13	In person	19.09.21			Refused	N/A
	Cae Garw	Plot 14	In person	10.08.21			Refused	N/A
49	Cae Garw	Plot 15	telephone	13.07.21			Yes	Yes
	Cae Garw	Plot 16	In person	13.07.21			Refused	N/A
50	Cae Garw	Plot 17	In person	28.07.21			Yes	Yes
51	Cae Garw	Plot 18	In person	07.09.21	24.09.21		Yes	Yes
52	Cae Garw	Plot 19	In person	10.08.21			Yes	Yes
53	Cae Garw	Plot 20	In person	10.08.21			Yes	Yes
54	Cae Garw	Plot 21	In person	10.08.21			Yes	Yes
	Cae Garw	Plot 22	In person	14.09.21			Refused	N/A



## Appendix C: . Interview Log

	Cae Garw	Plot 23	In person	13.09.21			Refused	N/A
	Cae Garw	Plot 24	In person	13.09.21	14.09.21		Vacant	N/A
56	Cae Garw	Plot 25	In person	14.09.21			Yes	Yes
57	Cae Garw	Plot 26	In person	08.09.21			Yes	Yes
58	Cae Garw	Plot 27	In person	08.09.21	13.09.21		Yes	Yes
59	Cae Garw	Plot 28	In person	13.08.21			Yes	Yes
60	Cae Garw	Plot 29	In person	13.07.21			Yes	Yes
61	Cae Garw	Plot 30	telephone	25.08.21			Yes	Yes
	Cae Garw	Plot 31	In person	13.07.21			Vacant	N/A
	Cae Garw	Plot 32	In person	01.09.21	14.09.21		Refused	N/A
	Cae Garw	Plot 33	In person	01.09.21	14.09.21		Yes	Yes
62	Cae Garw	Plot 34	In person	10.08.21			Yes	Yes
63	Cae Garw	Plot 35	In person	10.08.21			Yes	Yes
	Cae Garw	Plot 36	In person	13.09.21	15.09.21		Refused	N/A
64	Cae Garw	Plot 37	In person	14.07.21			Yes	Yes
65	Cae Garw	Plot 38	telephone	13.07.21			Yes	Yes
8	Bricks and Mortar	N/A	In person	16.09.21			Yes	Yes
	Bricks and Mortar	N/A	In person	17.09.21	22.09.21	24.09.21	Not in	N/A
9	Bricks and Mortar	N/A	In person	09.09.21			Yes	Yes

## Appendix C: . Interview Log

10	Bricks and Mortar	N/A	In person	24.09.21			Yes	Yes
11	Bricks and Mortar	N/A	In person	24.09.21			Yes	Yes
12	Bricks and Mortar	N/A	In person	24.09.21			Yes	Yes
13	Bricks and Mortar	N/A	In person	09.09.21			Yes	Yes
34	Bricks and Mortar	N/A	telephone	21.09.21			Yes	Yes
	Bricks and Mortar	N/A	In person	21.09.21	05.10.21		Family emergency - could not complete survey	N/A
35	Bricks and Mortar	N/A	In person	15.09.21			Yes	Yes
36	Bricks and Mortar	N/A	telephone	16.08.21	15.09.21		Yes	Yes
37	Bricks and Mortar	N/A	telephone	15.09.21	29.09.21		Yes	Yes
	Bricks and Mortar	N/A	In person	14.09.21			Left Authority area 7 months ago	N/A
38	Bricks and Mortar	N/A	telephone	23.09.21			Yes	Yes
39	Bricks and Mortar	N/A	In person	24.09.21			Yes	Yes

# Appendix C: . Interview Log



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## APPENDIX 2: Integrated Impact Assessment (IIA) - First Stage

### 1. Details of the initiative

<b>Initiative description and summary:</b> Neath Port Talbot Gypsy and Traveller Accommodation Assessment (GTAA) 2022
<b>Service Area:</b> Planning and Public Protection & Adult Services
<b>Directorate:</b> Environment and Regeneration & Social Services, Health and Housing

### 2. Does the initiative affect:

	Yes	No
Service users	✓	
Staff	✓	
Wider community	✓	
Internal administrative process only		✓

### 3. Does the initiative impact on people because of their:

	Yes	No	None/ Negligible	Don't Know	Impact H/M/L	Reasons for your decision (including evidence)/How might it impact?
Age		✓				The GTAA 2022 identifies the future accommodation needs for Gypsy and Traveller community in the County Borough from 2021 until the end of 2036.  Gypsies and Travellers are a minority group whose characteristics are protected by the provisions of the Equality Act 2010. Gypsies and Travellers should have equal access to culturally appropriate accommodation as all other members of the community.
Disability		✓				
Gender Reassignment		✓				
Marriage/Civil Partnership		✓				
Pregnancy/Maternity		✓				
Race	✓				L	
Religion/Belief		✓				

Sex		✓				<p>The findings of the GTAA will impact on the County's Gypsy &amp; Traveller community. The Council has a duty to meet any identified need under the Housing (Wales) Act 2014.</p> <p>Where a need is identified in a GTAA, the Council must set out provisions to meet this need in their Local Development Plan. Longer terms needs will also need to be addressed at the regional level by the South West Wales Strategic Development Plan as required by Future Wales Policy 19.</p> <p>Whilst the assessment itself will have a low impact on the Gypsy and Traveller community, future initiatives to meet the identified needs e.g. an LDP policy allocation or pitch provision planning application / delivery project could have a medium or high impact.</p>
Sexual orientation		✓				

**4. Does the initiative impact on:**

	Yes	No	None/ Negligible	Don't Know	Impact H/M/L	Reasons for your decision (including evidence)/ How might it impact?
People's opportunities to use the Welsh language			✓			The GTAA 2022 will not in itself have an impact on people's opportunities to use the Welsh Language. The GTAA survey was promoted bilingually (website & posters/flyers) and the final report will be published in Welsh in accordance with the Welsh Language Standards (No. 1) Regulations 2015.
Treating the Welsh language no less favourably than English		✓				As above.

**5. Does the initiative impact on biodiversity:**

	Yes	No	None/ Negligible	Don't know	Impact H/M/L	Reasons for your decision (including evidence) / How might it impact?
To maintain and enhance biodiversity		✓				The GTAA will not in itself have any impact on the maintenance or enhancement of biodiversity since it does not identify any precise land use implications.
To promote the resilience of ecosystems, i.e. supporting protection of the wider environment, such as air quality, flood alleviation, etc.		✓				The GTAA will not in itself have any impact on the promotion of the resilience of ecosystems since it does not identify any precise land use implications.

**6. Does the initiative embrace the sustainable development principle (5 ways of working):**

	Yes	No	Details
<b>Long term</b> - how the initiative supports the long term well-being of people	✓		The GTAA is concerned with the identification of accommodation needs for the Gypsy and Traveller community during the period from 2021 to 2036. The GTAA will contribute towards ensuring that the Council fully embraces the requirement to support the long term well-being of the Gypsy & Traveller population of NPT through the provision of sufficient pitches to accommodate identified needs.

<p><b>Integration</b> - how the initiative impacts upon our wellbeing objectives</p>	<p>✓</p>		<p>The GTAA is the first step in a process to identify and meet Gypsy &amp; Traveller accommodation needs. It will help the authority to meet the following well-being objectives:</p> <p>Objective 1: Support children in their early years, especially children at risk of adverse childhood experiences</p> <p>Objective 2: Create safe, confident and resilient communities, focusing on vulnerable people</p>
<p><b>Involvement</b> - how people have been involved in developing the initiative</p>	<p>✓</p>		<p>The GTAA has been prepared through engagement with officers across the Council, elected members and external stakeholders which includes representatives for Gypsies and Travellers through a steering group. The survey itself was undertaken by a survey team which consisted of researchers from different services within the authority. The Gypsy &amp; Traveller Forum was regularly updated throughout the GTAA preparation process. This forum includes representatives from a range of council services, voluntary sector organisations and adjoining authorities. This report seeks the endorsement of the draft GTAA 2022 report for submission to the Welsh Government for their approval.</p>
<p><b>Collaboration</b> - how we have worked with other services/organisations to find shared sustainable solutions</p>	<p>✓</p>		<p>As above, the stakeholder engagement undertaken during the preparation of the GTAA will ensure that there has been full collaboration with stakeholders and partners in the development of the final GTAA, including organisations from the public and community/voluntary sectors.</p>
<p><b>Prevention</b> - how the initiative will prevent problems occurring or getting worse</p>	<p>✓</p>		<p>The GTAA is concerned with ensuring that accommodation needs of Gypsies &amp; Travellers are fully investigated and accurately identified.</p> <p>The GTAA is the first step in the process to meeting any identified needs in a timely fashion for both the short and longer term.</p> <p>Making sufficient pitch provision for gypsies &amp; travellers will reduce the likelihood of unauthorised encampments occurring within our County. It will also help to resolve any overcrowding issues identified in the survey.</p>



**7. Declaration - based on above assessment (tick as appropriate)**

A full impact assessment (second stage) <b>is not</b> required	✓
Reasons for this conclusion	
<p><b>Equalities</b> – The GTAA 2022 is part of a process intended to meet the needs of a minority group; Gypsies and Travellers. Due regard has been paid to equalities issues and the protected characteristics of Gypsies &amp; Travellers from the start and throughout its preparation.</p> <p><b>Welsh Language</b> – The GTAA 2022 has been prepared in accordance with the Welsh Language Standards (No. 1)) Regulations 2015.</p> <p><b>Biodiversity</b> – In itself, the GTAA 2022 will not impact on biodiversity.</p> <p><b>Well-being of Future Generation (5 ways of Working)</b> – All five ways of working have been embraced during the preparation of the GTAA 2022. The document makes a positive contribution towards meeting the Council’s well-being objectives. A range of relevant stakeholders were involved in its preparation.</p>	

	Name	Position	Date
Completed by	Lana Beynon	Planning Policy Manager	6 <sup>th</sup> December 2021
Signed off by	Ceri Morris / Angela Thomas	Head of Service	7 <sup>th</sup> December 2021