



Llywodraeth Cynulliad Cymru
Welsh Assembly Government

Accommodation needs of Gypsy-Travellers in Wales

Report to the Welsh Assembly Government

Pat Niner
Centre for Urban and Regional Studies
School for Public Policy
University of Birmingham



CONTENTS

	Page
GLOSSARY	vii
EXECUTIVE SUMMARY	ix
1. INTRODUCTION	
INFORMATION ON GYPSY-TRAVELLERS IN WALES	1
RESEARCH APPROACH AND METHODS	3
OUTLINE OF THE REPORT	5
Terms Used	6
2. EXISTING SITE PROVISION	7
THE SITES NETWORK	7
Local Authority Sites	7
Private Gypsy-Traveller Sites	14
SITE CONDITION	17
A Description of Local Authority Gypsy-Traveller Sites in Wales	17
Local Authority Site Condition and Costs	23
The Private Site	26
STAKEHOLDER VIEWS ON SITES	27
Local Authority Views	27
Gypsy-Traveller Views	29
3. SITE MANAGEMENT AND FINANCE	33
ADMINISTRATIVE ARRANGEMENTS FOR SITE MANAGEMENT	33
Gypsy Council Managed Sites	33
Sites Managed In-House	35
Staffing Issues	36
MANAGEMENT POLICIES, PROCEDURES AND ISSUES	37
Site Residents	37
Site Management Performance	39
Licence Agreement and Site Rules	41
Waiting Lists and Pitch Allocations	47
Licence Fees and Other Charges	50
Repairs	52
Services	53

	Page
Management and Relations with Residents	56
Liaison with Other Service	58
SITE FINANCES	59
4. AN ESTIMATE OF GYPSY-TRAVELLER ACCOMMODATION NEED	61
A DISCUSSION OF METHODS	61
Gypsy-Traveller Accommodation Needs Assessments in Wales	61
Approach Adopted to Assessing Accommodation Needs	63
AN ESTIMATE OF ACCOMMODATION NEED IN WALES	64
Household Growth and Family Formation	64
Overcrowding and Poor Conditions on Sites	65
Waiting Lists and Movement Desires	65
Unauthorised Development of Sites	66
Unauthorised Camping and Nomadism	66
An Accommodation Needs Summary	70
GYPSY-TRAVELLER PERSPECTIVES ON ACCOMMODATION NEEDS	71
Accommodation Plans and Aspirations	71
Accommodation Concerns and Proposals	71
Attitudes towards Gypsy-Traveller Sites	72
Attitudes towards Bricks and Mortar Housing	73
Travelling and Associated Accommodation	74
SUMMARY AND DISCUSSION OF ISSUES AROUND 'NEED' FOR ACCOMMODATION	75
Summary of Estimated Need	75
Key Issues around Accommodation Need for Gypsy-Travellers	76
5. CONTRIBUTIONS TO SUPPLY OF GYPSY-TRAVELLER ACCOMMODATION	81
GYPSY-TRAVELLER ACCOMMODATION STRATEGIES AND POLICIES	81
General Gypsy-Traveller Accommodation Policies	81
Local Authority Site Provision	82
Managing Unauthorised Camping	82
Planning	87
Housing and Homelessness	91
Contributions to Supply of Gypsy-Traveller Accommodation	94
PERCEIVED OBSTACLES TO SITE PROVISION	95
Local Authority Views	95
Gypsy-Traveller Perceptions of Discrimination	96
Community and Town Council Consultation	98

	Page
6. BENCHMARKING AND IDEAS FROM ELSEWHERE	99
GYPSY-TRAVELLER SITE PROVISION	99
Republic of Ireland	100
France	102
Site Provision: Comments	104
GYPSY-TRAVELLER SITE IMPROVEMENT	104
FORMS OF GYPSY-TRAVELLER ACCOMMODATION AND WIDER POLICIES	106
Group Housing	107
Other Traveller Accommodation Policies in the Republic of Ireland	109
SERVICES TO GYPSY-TRAVELLERS AND SITE MANAGEMENT	110
7. CONCLUSIONS AND RECOMMENDATIONS	113
STRATEGY AND POLICY FRAMEWORK	113
THE EXISTING SITES NETWORK	113
NEED FOR ADDITIONAL RESIDENTIAL SITE PROVISION	117
NEED FOR TRANSIT SITES AND ACCOMMODATION FOR NOMADISM	118
GYPSY-TRAVELLER SITE MANAGEMENT	120
GYPSY-TRAVELLERS AND SOCIAL HOUSING	121

Appendix 1: SCHEDULE USED IN CONDITION SURVEY

Appendix 2: MEMBERS OF THE PROJECT ADVISORY GROUP

Tables

Table 2.1: Local Authority Gypsy-Traveller Sites in Wales	10
Table 2.2: Size of Sites in Wales	11
Table 2.3: Age of Site	12
Table 2.4: Problems in the Local Area	18
Table 2.5: Thirty Years Repair/Improvement Costs	25
Table 2.6: Local Authority Assessments of Site Quality	27
Table 3.1: Split of Site Management Responsibilities between Local Authorities and Gypsy Council	34
Table 3.2: Assessments of Sites on Various Management Issues and Problems	39
Table 3.3: Mobile Homes, Sheds and Additional Caravans	42

	Page
Table 3.4: Animals Permitted on Site	43
Table 3.5: Visits to Sites by Other Service Providers	58
Table 4.1: Number of Unauthorised Encampments over Three Month Period by Local Authority	66
Table 4.2: Summary of Estimate of Need for Permanent Accommodation in Wales 2005 to 2011	70
Table 5.1: Criteria Used in Unitary Development Plans from Internet	90
Table 5.2: References to Gypsy-Travellers in Housing Documents from Internet	93

ACKNOWLEDGEMENTS

I would like to thank everyone who has taken part in the research. In particular this means:

- Other members of the research team: Bruce Walker and Pat Jones of the Centre for Urban and Regional Studies, Sarah Cemlyn of the School for Policy Studies, University of Bristol, and Martin Gladwin and colleagues of Plus Property Solutions.
- Local authority personnel who have responded extremely well to repeated requests for information in questionnaire surveys and facilitated the surveyors in the condition survey.
- Stakeholders in the case study local authorities who were interviewed and otherwise provided information.
- Gypsy-Travellers who spared the time to be interviewed for the research.
- Members of the Project Advisory Group and other officers at Welsh Assembly Government for help and guidance throughout the research. A list of the members of the Project Advisory Group is included in Appendix 2.

Pat Niner

Centre for Urban and Regional Studies
School of Public Policy
University of Birmingham

GLOSSARY

The following abbreviations, words and phrases are used in this report and may need some explanation.

Amenity unit: On most residential Gypsy-Traveller **sites** basic plumbing amenities (bath/shower, WC and sink) are provided at the rate of one per **pitch** in small permanent buildings.

Caravans: Mobile living vehicles used by Gypsy-Travellers. Also referred to as **trailers**.

Chalets: There is no specific definition of the term 'chalet'. It is applied here to small, single-storey residential units, resembling mobile homes but not legally 'caravans'. They may be pre-fabricated or constructed from brick or blocks.

CJPOA: Criminal Justice and Public Order Act 1994. Includes powers for local authorities and police to act against **unauthorised encampments**.

CURS: Centre for Urban and Regional Studies at the University of Birmingham.

DoE: Department of the Environment - English central government department with responsibility for Gypsy sites policy before **ODPM**.

GSRG: Gypsy Sites Refurbishment Grant. A challenge fund available in England from 2001/2 providing financial help to refurbish (and later to provide) local authority Gypsy **sites**.

Gypsy: Member of one of the main groups of Gypsy-Travellers in Wales. Romany Gypsies trace their ethnic origin back to migrations, probably from India, taking place at intervals since before 1500. Gypsies were recognised as an ethnic group in 1989.

Gypsy-Traveller: Term used in this report to include all groups of **Gypsies** and **Travellers**, including both traditional ethnic groups and **New Travellers**.

Irish Traveller: Member of one of the main **Gypsy-Traveller** groups in Wales. Irish Travellers have a distinct indigenous origin in Ireland and have been in England since the mid nineteenth century. They were recognised as an ethnic group in 2000.

LDPs: Local Development Plans which are to be produced by Local Planning Authorities in Wales under the provisions of the Town Planning and Compulsory Purchase Act 2004.

LPA: Local Planning Authority.

Mobile home: Legally a 'caravan' but not usually capable of being moved by towing.

New Traveller: Term applied here to denote a member of the wide variety of people who are not traditional, ethnic **Gypsies** or **Travellers**, but who live in **caravans** or other vehicles. Some New Travellers have opted to move out of bricks and mortar housing, others have been born on the road.

NIHE: Northern Ireland Housing Executive.

ODPM: Office of the Deputy Prime Minister, the English central government department with responsibility for housing, planning and Gypsy site provision.

Pitch: Area of land on a Gypsy-Traveller **site** normally occupied by one licensee family. Sometimes referred to as a **plot**.

Plot: See **pitch**.

Residential site: A Gypsy-Traveller **site** intended for long-term or permanent occupation by residents.

Roadside: Term used here to indicate families on **unauthorised encampments**, whether literally on the roadside or on other locations such as fields, car parks, industrial estates or other open spaces.

Rol: Republic of Ireland.

RSL: Registered social landlord, mainly housing associations, registered with and regulated by the Housing Corporation.

Site: An area of land laid out and used for Gypsy-Traveller caravans. An authorised site will have planning permission. An unauthorised site lacks planning permission.

Trailers: Term used for mobile living vehicles used by Gypsies and Travellers. Also referred to as **caravans**.

Transit site: A Gypsy-Traveller site intended for short-term use while in transit. The site is usually permanent, but there is a limit on the length of time residents can stay.

Travellers: General term used by and of **Gypsy-Travellers**, signifying the importance of nomadism to the culture. Prefixes sometimes denote the origin of the group, for example **Irish Traveller**, Scottish Traveller or **New Traveller**. Some **Gypsies** prefer to be known as Travellers.

Unauthorised encampment: Land where Gypsy-Travellers reside in vehicles or tents without permission. Unauthorised encampments can occur in a variety of locations (roadside, car parks, parks etc) and constitute trespass.

Unauthorised development: Establishment of Gypsy-Traveller **sites** without planning permission, usually on land owned by those establishing the site. Unauthorised development may involve groundworks for roadways and hardstandings, and construction of **amenity units** and other buildings.

UDPs: Unitary Development Plans which were to be produced by Local Planning Authorities under the Town and Country Planning Act 1990.

WAG: Welsh Assembly Government.

EXECUTIVE SUMMARY

S.1. In December 2004 the Welsh Assembly Government commissioned the Centre for Urban and Regional Studies, University of Birmingham to carry out research on the accommodation needs of Gypsy-Travellers in Wales to inform policy development. The research arose from a series of recommendations in the National Assembly's Equality of Opportunity Committee's report *Service Provision for Gypsies and Travellers* which highlighted the central importance of accommodation to all Gypsy-Traveller services.

S.2. The research comprised nine main activities: literature review and scoping interviews; a preliminary e-mail questionnaire survey of local authorities aimed particularly to establish the number and location of Gypsy-Traveller sites (response rate 21 out of 22 authorities); a general policy survey of local authorities to establish information on corporate responsibilities for Gypsy-Traveller accommodation, policies towards Gypsy-Travellers, local needs assessments, perceived obstacles to site provision, unauthorised encampment and social housing (100% response rate); a local authority site provision and management survey of site-owning local authorities to establish management arrangements and staffing, site management policies, and site finances (100% response rate); a condition survey of all nineteen local authority sites carried out by Plus Property Solutions; a series of four case studies which aimed to look at Gypsy-Traveller accommodation issues in the round (these case studies involved interviews with key local stakeholders and with 39 Gypsy-Travellers in a variety of types of accommodation); a wider consultation with major public land-owners, Community and Town Council Clerks, and Police Forces; a review of reports relating to Gypsy-Traveller accommodation provision in other countries; and analysis and synthesis of the material collected to reach conclusions leading to a number of recommendations.

BACKGROUND

S.3. Very little information is available on Gypsy-Travellers in Wales. Total numbers are small, perhaps around 2,000 people, mostly concentrated along the key transport routes in the North and South of Wales, which are also the location of most of the settled population. The Gypsy-Traveller population is ethnically diverse, including in particular Welsh and English Gypsies, Scottish and Irish Travellers. There are also numbers of 'New Travellers', especially in parts of Pembrokeshire, Powys and rural North Wales. Gypsy-Travellers have distinct demographic and economic characteristics, and are one of the most socially excluded groups in Britain. Exclusion is increased by discrimination. Gypsy-Travellers appear to be becoming more 'settled' on permanent sites or in housing for positive reasons and because travelling is becoming increasingly difficult.

THE EXISTING SITES NETWORK

S.4. There are at least 30 Gypsy-Traveller sites in Wales, providing around 440 pitches. Nineteen sites are owned by local authorities, providing around 380 pitches (excluding those that are closed and not available for letting). Most local authority sites are located within the North and South Wales coastal strips or in the Valleys. Very little is known about private sites in Wales; an unknown number of Gypsy-Travellers live on caravan sites not specifically designated or designed for Gypsy-Travellers.

S.5. Most local authority sites are purely residential (intended for long-term occupation), but seven sites have some transit pitches although not all are used for transit purposes. The average site size is just under 22 pitches. Fifteen of the nineteen sites were developed after 1980. The number of pitches currently available is similar to that found in the last Gypsy Count Survey in January 1997 although some sites have closed and others opened. There are few firm plans for future change.

S.6. Demand for local authority sites is variable; some sites are over-subscribed with waiting lists, others have pitches which have been closed or are empty because of lack of demand. Family and social factors affect demand as well as location, environment and site conditions. Where information is available, pitch occupancy is high and this affects the ability to achieve desirable separation distances between caravans for fire safety on some sites.

S.7. The existing network of local authority Gypsy-Traveller sites is not entirely fit for purpose. The network requires just under £3 million expenditure over the next five years to bring it to a good standard of repair. It will require over £10 million expenditure over 30 years to bring sites up to standard and maintain them at that level. Standards are particularly poor where transit pitches with minimal facilities are being used for long-stay residential purposes. Comparing local authority sites with their English equivalents suggests that Welsh sites on average have larger pitches and larger amenity units, but are more likely to be located next to industrial or commercial land-uses and to suffer problems from their environment. Expenditure needs are similar on a per pitch basis.

S.8. Gypsy-Traveller site residents share common concerns over conditions on transit pitches (where provided) and the lack of children's play space on most sites. Views of environment, site design and quality of infrastructure and services varied widely between sites. The interviews revealed how extended families live on some pitches, and variety in the ways in which amenity units are used. The variety revealed underlines the importance of consulting residents in drawing up site improvement schemes and being flexible in responding to individual needs and preferences - so long as this can be done in a way accepted as fair to everyone.

SITE MANAGEMENT AND FINANCE

S.9. Six of the nineteen local authority sites are managed by the Gypsy Council under an agreement with the local authority owner. Where management is contracted to the Gypsy Council, the manager has almost total autonomy over day-to-day decisions, including licence fee levels, pitch allocations and evictions. All site managers are Gypsy-Travellers and the manager lives on site on five of the six sites. Contract monitoring is often informal. Stakeholder (and Gypsy-Traveller) opinions vary sharply on the merits of Gypsy Council site management.

S.10. The remaining thirteen sites are managed in-house by local authority staff, none of whom is a Gypsy-Traveller and none of whom live on site. The housing department is responsible for site management for all but two sites, but patterns of management differ significantly in terms of on-site presence and staff time devoted to management.

S.11. Site residents are licensees rather than tenants and thus have significantly less security and fewer statutory rights; few authorities enhance basic rights in the licence agreement. There are restrictions on having additional caravans, keeping animals other than dogs, travelling off the site while retaining the pitch and having visitors to stay with caravans on a minority of sites. Sites are evenly split on whether work is allowed on site, though it actually takes place

on a larger number of sites. Enforcing site rules is acknowledged to be difficult and to rely to a considerable extent on the personality of the site manager and the trust and respect that develops between the manager and residents. Many of the Gypsy-Travellers interviewed apparently favoured firm management although desires and expectations obviously varied.

S.12. Other findings about site management include:

- There are waiting lists for pitches on eight sites. Pitch allocation policies are sometimes informal, but fewer managers say that family or personal compatibility is an important factor than is the case in England. Not all sites are formally allocated in that some licences are confirmed after families move onto a pitch. A supportive, cohesive site community is prized on several sites, although disputes between residents, intimidation, vandalism or other anti-social behaviour is reported to occur sometimes on all but five sites.
- The average licence fee charged is £40.59, lower than was found in England in 2002. It is rare for there to be other fixed charges or deposits. Costs normally exceed income on most sites - sometimes by a large margin. Most site residents are in receipt of housing benefit.
- Repairs are normally reported to officers while on site. Most managers set response time targets. Contractors are said to have been reluctant to work on over half of all sites. Gypsy-Travellers on different sites had very different opinions about repairs, ranging from very favourable to highly critical.
- Residents do not have a choice of electricity supplier. Most pay for electricity through a card meter. Electricity pricing is a major issue with residents in one area. Water is most frequently paid for through a standard charge which is not directly related to usage; no identifiable charge is made at five sites. LPG is used by residents on all sites, mainly for cooking and sometimes for heating. Arrangements are made for the removal of bulky items of refuse on most sites in addition to normal domestic refuse collection. Fly-tipping is an issue on or near some sites, though not necessarily caused by site residents. Postal delivery methods vary, but are very rarely said to be problematic.
- There is a formal complaints procedure which site residents can use to make a complaint about the site manager or management issues on most sites. Site residents have been consulted on matters to do with site management, repairs or site improvements during the last year on six sites. Verbal consultation with individual residents was the most common method used. Some site residents would welcome more consultation, although the least satisfied wanted action rather than consultation.
- Health visitors and education workers regularly visit most sites. Service providers are said to have been reluctant to visit six sites - a problem which can be resolved through the services of site wardens/officers.

GYPSY-TRAVELLER ACCOMMODATION NEEDS

S.13. Methods for estimating Gypsy-Traveller accommodation needs are still developing. Very few recent assessments have been made in Wales although more are planned. The research estimated the current accommodation backlog and needs over the next five years

from: household growth and family formation; overcrowding and poor site conditions; movement desires (including movement to sites from houses) and waiting lists; unauthorised development of sites by Gypsy-Travellers without planning permission; and unauthorised camping and nomadism.

S.14. These calculations provide an estimated additional need for permanent accommodation for between 275 and 305 Gypsy-Traveller families over the next five years across Wales. Considering Gypsy-Traveller views and aspirations revealed in the interviews suggests a need for 150-200 local authority site places, 50 private site places and 50-100 units of bricks and mortar housing. In addition, between 100 and 150 places are estimated to be needed on transit sites or stopping places (including an allowance for necessary vacancy levels) to accommodate nomadism and travelling while reducing the level of unauthorised camping. Most residential site need is generated from/near existing popular sites. Transit need is mainly related to cross-Wales major routes and the area around Aberystwyth.

CONTRIBUTIONS TO SUPPLY OF GYPSY-TRAVELLER ACCOMMODATION

S.15. There is no national strategy or policy on Gypsy-Traveller accommodation, and there appears to be little strategic thinking on Gypsy-Traveller accommodation at local authority level either. In many authorities policies towards Gypsy-Traveller accommodation are fragmented between departments and sections so that the overall service requires input from many officers, most of whom spend only a fraction of their time on Gypsy-Traveller matters. In addition to making strategic thinking more difficult, this can also make it hard for members of the public, including Gypsy-Travellers, to know whom to contact in an authority.

S.16. Current policies will not provide the accommodation estimated to be needed:

- If past trends continue, some 100-125 pitch vacancies will arise over the next five years, but few of these will be on the over-subscribed sites where most needs arise.
- Current policies towards unauthorised encampments 'cope' with the issue, but not satisfactorily for the Gypsy-Travellers involved or for landowners, businesses and the settled community. Gypsy-Travellers on unauthorised encampments have very poor living conditions and the speed of eviction action makes it hard to get children into schools or to access other services. There is little evidence of firm proposals to provide formal or informal authorised transit provision.
- Most adopted and emerging Unitary Development Plans have criteria-based policies for considering planning applications for Gypsy-Traveller sites. While criteria may not be impossible to meet, policies are not pro-active in the sense of positively identifying land for Gypsy-Traveller sites. The indications are that local planning authorities are reluctant to grant planning permission to Gypsy-Travellers for site development - suggesting that overall the system is in practice negative.
- The majority of local authorities do not refer to Gypsy-Travellers and their needs in housing or homelessness strategies at present. However, Gypsy-Travellers are able to access permanent social housing through normal allocation processes. Some tenancies are short and there is movement between sites and housing which is likely to continue.

S.17. There are significant barriers to site provision, mainly to do with problems of finding sites and getting planning permission in the face of resistance from local people in the settled

community. Consultation with Community and Town Councils and other local bodies in areas with existing Gypsy-Traveller sites suggests that few problems arise from sites, although transient Gypsy-Travellers on unauthorised encampments are perceived as much more problematic. Consultees were split between those where site residents are well integrated into the local community and those where relations can be seen as mutual reluctant toleration at best.

S.18. Stakeholder suggestions for reducing barriers to site provision included restoration of a site provision duty, better funding and a clear lead from the Welsh Assembly Government. Some saw the importance of increasing understanding between the settled and Travelling communities and reducing prejudice. Gypsy-Travellers are very aware of prejudice and almost all interviewees quoted examples of discrimination they had faced. They noted the tendency of the settled community to stereotype and lump all Gypsy-Travellers together, and felt that Gypsy-Travellers are the population group against whom it is still 'acceptable' to make racist remarks. Gypsy-Travellers think that the settled community and policy-makers are not really interested in their problems and needs.

BENCHMARKING AND IDEAS FROM ELSEWHERE

S.19. The research examined information from other countries where the Gypsy-Traveller population has broadly similar characteristics. Benchmarking was limited to material in English and French.

S.20. There are four themes to the benchmarking:

- Site provision - drawing particularly on experiences in the Republic of Ireland and France.
- Site improvement and refurbishment - drawing on experience of the Gypsy Sites Refurbishment Grant in England.
- Forms of Gypsy-Traveller accommodation and wider policies - looking again at the Republic of Ireland and Northern Ireland where group housing has been developed.
- Site management - reporting on the inclusion of services to Gypsy-Travellers and site management in the housing performance regime in Scotland.

CONCLUSIONS AND RECOMMENDATIONS

S.21. The main points arising from the research are stated as conclusions and a series of recommendations - mainly to the Welsh Assembly Government, but also to the Welsh Local Government Association and local authorities. In all, 28 recommendations are made under six broad headings: overall strategy and the policy framework; the existing sites network; the need for additional residential site provision; the need for transit site provision; site management; and social housing.

1. INTRODUCTION

1.1 In December 2004 the Welsh Assembly Government commissioned the Centre for Urban and Regional Studies, University of Birmingham to carry out research on the accommodation needs of Gypsy-Travellers in Wales. The research is intended to inform the development of policy by providing up-to-date and reliable information on:

- the number, size and condition of existing permanent and temporary Gypsy-Traveller sites in Wales;
- the extent and location of unauthorised encampments;
- whether the number of places on existing authorised sites is sufficient to meet the present and likely future levels of demand for accommodation;
- the need for new site provision - permanent, transit and stopping places - with the estimated costs of providing such facilities¹;
- the obstacles to new site development and how they can be overcome;
- the contribution of the planning system to the provision of Gypsy-Traveller sites/accommodation; and
- good practice in site provision, management and design.

1.2 The research arose from a series of recommendations in the National Assembly's Equality of Opportunity Committee's report *Service Provision for Gypsies and Travellers* which highlighted the central importance of accommodation to all Gypsy-Traveller services. Recommendation 14 of the report was that '*there should be an audit of existing site provision to identify the demand for further sites and gather information on good site design, facilities and location which will inform future site development*'.

INFORMATION ON GYPSY-TRAVELLERS IN WALES

1.3 Very little information is available on Gypsy-Travellers in Wales. Partly this is due to the general 'invisibility' of Gypsy-Travellers in the United Kingdom where neither the national census nor many ethnic monitoring schemes identify Gypsies and/or Travellers. Partly it is because there have been no published Counts of Gypsy caravans since 1997, unlike in England and Scotland. Even if count information was available, it would not, of course, include Gypsy-Travellers living in housing who may or may not wish to self-identify as Gypsy-Travellers.

1.4 The Welsh Assembly's Equality of Opportunity Committee² attempted to provide basic information on the Gypsy-Traveller population through a survey of local authorities which asked about the number of Gypsy-Traveller adults and children in their areas. This produced a total of 1,412 Travellers (642 adults and 770 children), 59% of whom were living on local authority sites, 9% on private sites, 3% on unauthorised sites and 28% in houses. The replies came from eleven of the 22 authorities and the estimate is clearly a significant under-count since three authorities where there are known to be local authority Gypsy-Traveller sites are not included. It is also likely that housed Gypsy-Travellers are under-counted, but to an unknown extent.

1 With the agreement of Welsh Assembly Government, estimates of the cost of new site provision have been deferred pending the collation of further information from new site provision costs in England.

2 National Assembly for Wales Equality of Opportunity Committee, *Service Provision for Gypsies and Travellers*, 2003, pages 20-21

1.5 Another route to estimating the size of the Gypsy-Traveller population is through the number of children from education sources. Here, however, there is considerable uncertainty and disagreement. In 1997 the Welsh Office estimated that there were 846 Traveller children in Wales of whom 578 were aged from 5 to 16. However, in 1998, a Save the Children and Cardiff University report³ estimated that there were at least 1,809 Gypsy-Traveller children. National Assembly for Wales PLASC figures for 2004⁴ record a total of 767 Gypsy-Traveller children suggesting that numbers are now somewhere between the two earlier estimates at perhaps around 1,100 children of all ages.

1.6 Bringing this information together suggests that there are at least 2,000 Gypsy-Travellers in Wales. Whatever the precise numbers, it is clear that Gypsy-Travellers make up a very small proportion of the Welsh population, and absolute numbers are likely to be small in any area.

1.7 In terms of geographical distribution, there is agreement that most Gypsy-Travellers are concentrated along the key transport routes in the North and South of Wales⁵, which is also the location of most of the settled population in Wales.

1.8 It is also recognised that the Gypsy-Traveller population is ethnically diverse⁶ and it is likely that all the groups found in Britain will be present in Wales, including in particular Welsh and English Gypsies, Scottish and Irish Travellers. There are also numbers of 'New Travellers' (see definitions in 1.17), especially in parts of Pembrokeshire and Powys where travelling and 'green' low impact living seem to merge.

1.9 Other background characteristics likely to be features of traditional Gypsy-Travellers in Wales apparent from the general literature on Gypsies and Travellers in Britain and preliminary interviews in Wales include:

- Gypsy-Travellers tend to marry younger and have larger families than the average for the settled community. Extended families where several generations and/or several siblings and their families live together (but not in the same household) are important in the culture of some Gypsy-Traveller groups.
- Gypsy-Traveller employment - always flexible - seems to be changing. Traditional agricultural seasonal work is being threatened by, for example, migrant workers. The market focus through building works, tarmac laying, tree and garden work, and furniture and carpet dealing is increasingly urban and suburban. Gypsy-Travellers are also moving into less traditional 'mainstream' employment (rather than self-employment).
- Gypsy-Travellers are one of the most socially excluded groups in Britain with greater probability of ill health, poor educational attainment (by settled community measures) and poverty. Improved accommodation and particularly avoiding frequent forced movement through eviction is seen as central to tackling social exclusion. Exclusion is also increased by discrimination.

3 L Morgan & EC Melhuish, *Traveller Children and Educational Need in Wales: a report prepared for the Save the Children Fund and Welsh Office*, 1998

4 Quoted in G Jones, R Powell & A Reakes, *Research into the Education of Gypsy Travellers in Wales: Draft Interim Report*, National Foundation for Educational Research, August 2005

5 National Assembly for Wales Equality of Opportunity Committee, *Service Provision for Gypsies and Travellers*, 2003, page 21

6 Rachel Morris, *Gypsies in Wales*, Cardiff Law School, 1999 accessed on 15/11/2005 at <http://www.law.cf.ac.uk/tlru/MovingOn.pdf>

- Gypsy-Travellers appear to be becoming more 'settled', whether on residential sites or in houses. It is not clear to what extent this is a positive lifestyle choice or forced through the sheer difficulty of finding safe places to stop while travelling.

RESEARCH APPROACH AND METHODS

1.10 Because of the lack of basic up-to-date information on Gypsy-Travellers in Wales, a significant proportion of research time was devoted to putting together an information base. The research comprised nine main activities:

- i. Literature review and scoping interviews with Welsh Assembly Government personnel, the Cardiff Gypsy and Traveller Project and written communication with the Gypsy Council. This aimed to establish the background to the project, the main concerns and issues, and likely availability of information.
- ii. A preliminary e-mail questionnaire survey of local authorities aimed particularly to establish the number and location of Gypsy-Traveller sites in Wales to provide a sample frame for the condition survey. Twenty-one of the 22 local authorities in Wales (including all site-owning authorities) responded. The findings were reported to the Project Advisory Group⁷ in April 2005.
- iii. A general policy survey of local authorities to establish information on corporate responsibilities for Gypsy-Traveller accommodation, policies towards Gypsy-Travellers, local needs assessments, perceived obstacles to site provision, unauthorised encampment and social housing. All 22 local authorities responded. Survey information is supplemented by an analysis of Unitary Development Plans and Housing, Homelessness and BME Housing Strategies from the internet. A report of the findings was discussed by the Project Advisory Group in August 2005.
- iv. A local authority site provision and management survey of site-owning local authorities to establish management arrangements and staffing, site management policies, and site finances. The thirteen site-owning authorities responded providing information relating to all nineteen local authority sites in Wales.
- v. Plus Property Solutions carried out a condition survey of all nineteen local authority sites in early June 2005; a single private site was also included in the survey. The condition survey collected two kinds of information:
 - broadly descriptive information about the site environment, the site itself and its facilities, individual pitches and amenity blocks; and
 - information to calculate the costs of bringing the site up to a good state of repair and maintaining it there over the next thirty years. The methodology used was developed for work in England and is similar in principle to that employed in bricks and mortar house condition surveys (more details in para 2.79 et seq below).

This survey is the subject of a separate published report⁸.

⁷ See Appendix 2 for membership of the Project Advisory Group.

⁸ *Accommodation Needs of Gypsy-Traveller in Wales: Site Physical Condition Survey*. Welsh Assembly Government 2006.

- vi. A series of four case studies based in Blaenau Gwent, Cardiff, Flintshire and Pembrokeshire aimed to look at Gypsy-Traveller accommodation issues in the round and to see how local policies work together. The case studies involved:
- Collection and analysis of any relevant documentation.
 - Interviews (face-to-face or by telephone) with key local stakeholders including elected members and local authority personnel. The interviews were carried out by Pat Niner and Bruce Walker of the Centre for Urban and Regional Studies.
 - Face-to-face interviews and small group discussions with Gypsy-Travellers in a range of types of accommodation in the case study areas and adjoining areas. These interviews were relatively informal. They are not intended to provide representative quantitative data, but rather to give a flavour of Gypsy-Traveller perspectives and views. Identifying Gypsy-Traveller interviewees was through third parties - site managers, education workers or support groups; in most cases we were personally introduced to the interviewee. Interviews were achieved:
 - 26 people (18 women and 8 men) in 17 separate interviews on local authority sites.
 - 8 people (6 women and 2 men) from 6 separate households in houses; one interviewee was a New Traveller (see 1.17).
 - 3 people (2 women and 1 man) from 2 households on authorised private caravan sites - neither interview was carried out in a case study area; one was on a private Gypsy-Traveller site in Torfaen, the other on a caravan site in Carmarthenshire not specifically designated for Gypsy-Travellers.
 - 2 people (both women) were interviewed on unauthorised sites - this proved to be the most problematic for identifying interviewees. One of the interviewees was a woman waiting for a local site place and the other was a New Traveller on a farmer's land. We were not able to include interviews with Gypsy-Travellers passing through the area.

The interviews were carried out by Pat Niner and Pat Jones from CURS and Sarah Cemlyn of the School for Policy Studies, University of Bristol.

- vii. Wider consultation was carried out as follows:
- A written consultation of public land-owners (mainly concerned with unauthorised encampment). Eight bodies were contacted and five responded. NFU Cymru was also contacted but did not respond.
 - Community and Town Council Clerks were contacted by letter in areas including or adjoining local authority sites, asking particularly for their assessments of relations between Gypsy-Travellers and settled residents in their area and for ideas on how good relations could be fostered. In the areas without Community or Town Councils, umbrella voluntary organisations were contacted instead. Twenty-one letters were sent out and nine replies were received.

- Letters were sent to five Race Equality Councils seeking any information and their views on Gypsy-Traveller issues. No responses were received.
 - Contact was made by letter and/or face-to-face with representatives of each of the four Police Forces in Wales to ascertain a police perspective on Gypsy-Traveller issues and in particular on the management of unauthorised camping.
- viii. A review of reports relating to Gypsy-Traveller accommodation provision in other countries was carried out, mainly through the internet. This was confined to English and French language sources; more details are given in Chapter 6.
- ix. The final step was to analyse and synthesise material from all elements of the research. In particular this includes the estimates of accommodation need made in Chapter 3. This report presents the results of the analysis across all elements of the research. The research was supported throughout by a Project Advisory Group whose views and experience provided an additional source of information and aid to analysis.

OUTLINE OF THE REPORT

1.11 Chapter 2 describes existing authorised site provision in Wales, both local authority and private. It first establishes numbers of sites and pitches, then draws on the condition survey to describe sites and their facilities, and to assess the costs of bringing sites up to a good standard of repair and maintaining them at that standard over the next thirty years. The chapter ends with more qualitative information on sites from the viewpoints of local authority stakeholders and Gypsy-Travellers.

1.12 Chapter 3 looks at how local authority Gypsy-Traveller sites are managed, whether in-house or through the Gypsy Council. Individual site management policies and procedures are discussed, incorporating the views of site residents. The final section looks briefly at site finances.

1.13 Chapter 4 includes an estimate of need for Gypsy-Traveller accommodation over the next five years. It first describes the approach adopted in the assessment, then looks at various elements of need to produce an estimate of permanent and temporary (transit) accommodation needed. Gypsy-Traveller views on accommodation options are presented and fed into the estimate. Finally, some issues of need assessment are raised, including the possible distinction between 'need' and 'demand', the location of need, and issues of 'low demand'.

1.14 Chapter 5 looks at the current national and local policy framework and asks to what extent it is likely to deliver the accommodation estimated to be needed. Very broadly it concludes that 'normal' policies will deliver the permanent social housing opportunities that are needed, but site provision and planning policies are unlikely to deliver the needed additional site provision. The final section looks at some of the main obstacles to site provision.

1.15 Chapter 6 looks at approaches taken in other parts of the United Kingdom, the Republic of Ireland and France to see whether there are ideas which might usefully guide Welsh policy. The benchmarking material is used to explore issues of site provision, site improvement, types of Gypsy-Traveller accommodation and assistance given, and general services and site management.

1.16 Chapter 7 sets out the conclusions from the research and a series of recommendations, mainly addressed to the Welsh Assembly Government.

Terms Used

1.17 The terms used to name Gypsies and Travellers are often contentious. This was apparent from our interviews - some interviewees preferred to be referred to as Travellers because they thought the term 'Gypsy' is now pejorative; some were proud to be known as Gypsies. Some made a clear distinction between 'Gypsies' and 'Travellers' referring to different ethnic and lifestyle characteristics. In this report the term Gypsy-Traveller is used at the general level. Where a distinction is being made, for example between Welsh Gypsies and Irish Travellers, the more specific term is used. The term 'New Traveller' is used for people who live in caravans or other vehicles and adopt a (semi-)nomadic lifestyle but who do not belong to one of the ethnic Gypsy-Traveller groups. We hope that this use of terms does not cause offence.

2. EXISTING SITE PROVISION

2.1 This chapter looks at the existing network of Gypsy-Traveller sites in Wales. It looks first at numbers of sites and their tenure, location, type, size and age; this section also notes recent known changes in the network and possible future changes. The next section describes the condition of sites surveyed in the condition survey and estimates costs of bringing sites to a good state of repair and maintaining them at such a standard over the next 30 years. The final section presents stakeholder views on the site network, including those of Gypsy-Travellers. The chapter draws on several elements of the research - local authority surveys, the condition survey and the case studies.

THE SITES NETWORK

2.2 It has proved unexpectedly difficult to establish how many Gypsy-Traveller sites there are in Wales at present and how many pitches this represents. Much better information is available on sites owned by local authorities than on those which are privately owned. For convenience, local authority and private sites are treated separately below.

2.3 Overall, the best estimate is that there are at least 30 Gypsy-Traveller sites in Wales, providing around 440 pitches. Of these, nineteen (379 pitches excluding those which are closed) are owned by local authorities and at least eleven (about 55 pitches) are privately owned. In addition, Gypsy-Travellers live on an unknown number of private caravan sites which are not specifically designated for their use. In comparison with England, Wales has relatively more local authority site pitches (the number of local authority pitches is equivalent to about 8% of local authority pitches in English while the Welsh national population is equivalent to about 6% of the English population) but relatively less authorised private site provision (equivalent to about 2% of English private provision).

Local Authority Sites

2.4 In the absence of information from a regular caravan count we had to collect information from local authorities about their sites through questionnaires. Basic information was collected in the preliminary survey and more detailed information in the site provision and management survey. Independent information was also collected by surveyors in the condition survey. Each of these sources provides slightly different information about the precise number and nature of sites and pitches in Wales:

- The number of local authority sites depends on how Beddau Caravan Site in Rhondda Cynon Taf is viewed. This is an authority owned caravan site which is not specifically designated for Gypsy-Travellers but is currently occupied only by Gypsy-Travellers. This site has been included in the various research surveys and we effectively treat it as a local authority Gypsy-Traveller site.
- In the case of a few sites, the number of pitches given varied slightly between the different surveys. There is also the issue of how to treat pitches which are currently closed and not available for occupation. Pitch totals below are based on the site provision and management survey unless there is reason to think that the condition survey and first-hand independent information from surveyors is more accurate. Closed pitches are included in the total, but their numbers are described overleaf.

- Some sites provide both residential and transit pitches. Again there was some inconsistency between surveys in numbers. The case studies (which included two sites with some transit pitches) also illustrated the potential difference between pitch design and function: some 'transit' pitches are occupied long-term because of lack of space on the residential portion of the site or because residents do not want to move. Some transit pitches were not in use at all at the time of the condition survey - indeed some 'transit' pitches appear to be quite informal, being open areas of land which might be brought into use when needed. 'Transit' pitches here are defined by their design and amenities rather than their function. Numbers are generally taken from the site provision and management survey.

2.5 With these provisos, the sub-sections below describe the local authority sites in Wales. The basic information appears in Table 2.1. The location of the nineteen local authority sites in Wales is mapped in Figure 2.1.

Number and Location of Sites and Pitches

2.6 As can be seen in Table 2.1, there are nineteen local authority sites in Wales, together providing 404 pitches.

2.7 The nineteen sites are in thirteen local authority areas. There is no site in nine authority areas. Pembrokeshire has five sites providing 80 pitches; Cardiff has two sites providing 77 pitches and Neath Port Talbot has two sites providing 56 pitches. The other site-owning authorities have one each.

2.8 Geographical distribution (see Figure 2.1) shows that eleven sites (250 pitches) are located along the South Wales coastal strip and in Pembrokeshire, four sites (80 pitches) are in the Valleys and three sites (63 pitches) are in Wrexham or along the North Wales coast. Only the eleven pitch site at Welshpool (Powys) is located in Mid Wales. The distribution reflects both main transport routes (mainly east/west) and population centres. 'Gaps' purely in terms of large settlements/areas without sites at present include the north coastal strip between Queensferry and Bangor; Newport and the area to the east in South Wales; and Carmarthen and Aberystwyth.

Figure 2.1: Location of Local Authority Gypsy-Traveller Sites in Wales

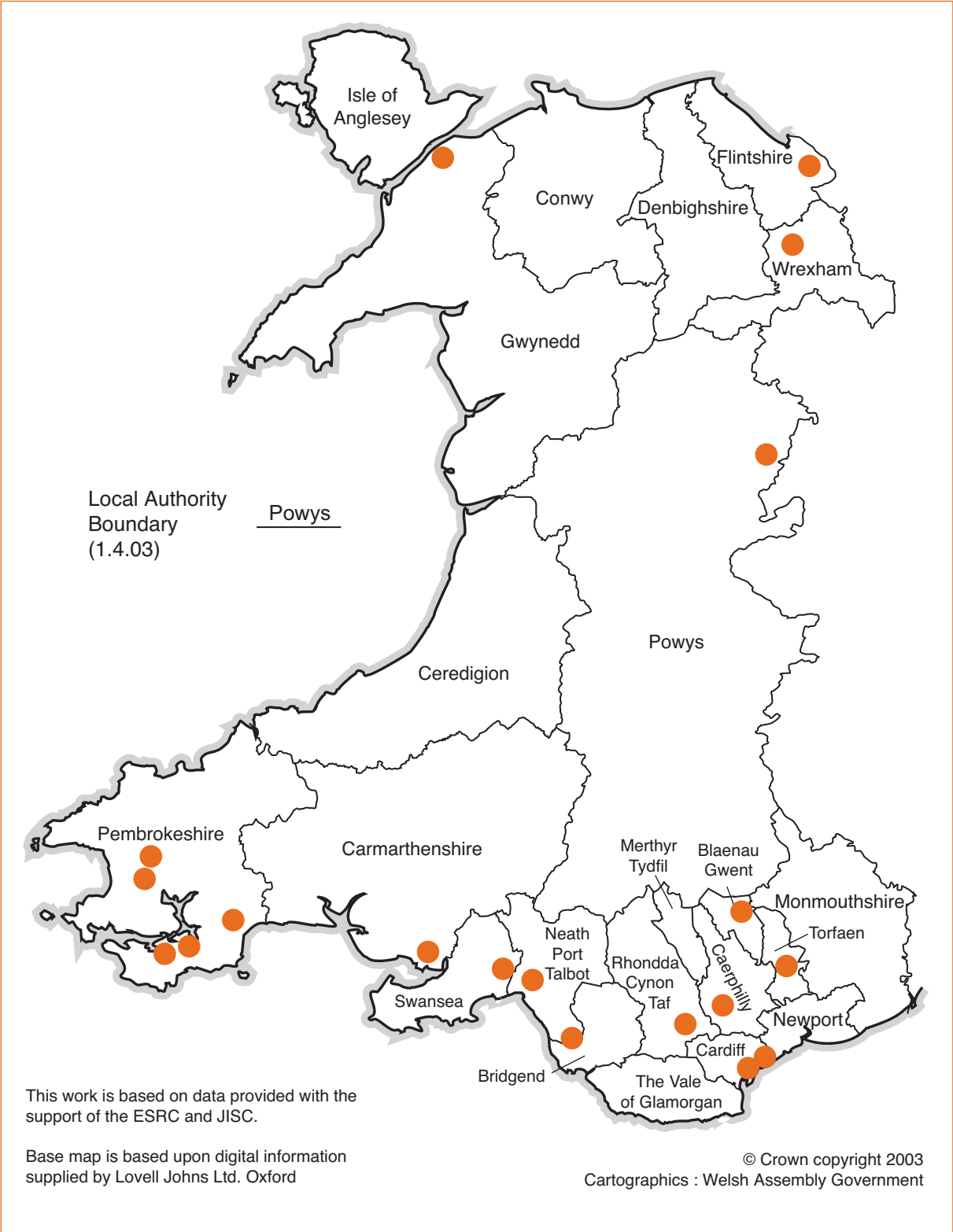


Table 2.1: Local Authority Gypsy-Traveller Sites in Wales

Local authority	Site name	Date built	Date refurbished	Total pitches	Residential pitches	Transit pitches	Management
Blaenau Gwent	Cwmcrachen	1965	1995	24	17	7	LA
Cardiff	Shirenewton	1992		56	56	0	LA
Cardiff	Rover Way	1972	1988	21	21	0	LA
Carmarthenshire	Penybryn	1997		30	30	0	LA
Flintshire	Riverside	1997		20	20	0	Gypsy Council
Gwynedd	Llandygai	1981	1993	24	12	12	Was GC, now LA
Merthyr Tydfil	Glynmil	1979		24	24	0	Gypsy Council
Neath Port Talbot	Caegarw	1989	2000	27	24	3	Gypsy Council
Neath Port Talbot	Briton Ferry	1994	2000	29	25	4	Gypsy Council
Pembrokeshire	Catshole Quarry	1980		31	26	5	LA
Pembrokeshire	Kingsmoor Common	1983		21	21	0	LA
Pembrokeshire	Waterloo	1983		10	10	0	LA
Pembrokeshire	Withybush ⁽¹⁾	1995		9	9	0	LA
Pembrokeshire	Under the Hill	1997		9	9	0	LA
Powys	Withy Beds	1982	2005	11	11	0	LA
Rhondda Cynon Taf	Beddau ⁽²⁾	1968		5	4	1	LA
Swansea	Tygwyn	1988	1994	7	7	0	LA
Torfaen	Shepherd's Hill	1986	1992	27	26	1	Gypsy Council
Wrexham	Ruthin Road	1985	1999	19	19	0	LA

(1) The pitch total is taken from the condition survey which counts de facto use of the four formal pitches

(2) Not a designated Gypsy-Traveller site

Source: Local authority questionnaires and site condition survey

Type of Site

2.9 Gypsy-Traveller sites are commonly classified according to the types of pitches provided. Some have only residential pitches, some only transit pitches and some have both (mixed sites). Most sites (twelve) are residential. There are no purely transit sites at present. Seven sites (Cwmcrachen in Blaenau Gwent; Llandygai in Gwynedd; Caegarw and Briton Ferry in Neath Port Talbot; Catshole Quarry in Pembrokeshire; Beddau in Rhondda Cynon Taf; and Shepherd's Hill in Torfaen) are mixed. As noted above, this does not necessarily mean that they fulfil a transit role. Seven sites across Wales represents 37% of all sites. The pattern is slightly different from that found in England where there are seventeen transit sites and ten mixed sites out of a total of around 320 sites, together representing less than 10% of sites⁹. In all, there are 33 transit pitches in Wales out of the 404 total (8%) and 371 residential pitches (92%).

Size of Site

2.10 Table 2.2 shows the size of site in terms of total number of pitches. It compares the pattern with England.

Table 2.2: Size of Sites in Wales

Number of pitches	Number of sites	% of sites Wales	% of sites England
Up to 10	5	26	28
11 to 20	3	16	52
21 to 30	9	47	15
Over 30	2	11	5
Average size		21.3	15.8

Source: Table 2.1 and Pat Niner, *Local Authority Gypsy/Traveller Sites in England*, ODPM, 2003

2.11 As can be seen, most sites in Wales have over 20 pitches, and the average size is just over 20 pitches. Sites are significantly larger than in England where the average is just less than sixteen pitches.

Age of Site

2.12 Table 2.3 looks at age of site based on the date at which it was first developed by the local authority and again compares the distribution with England. It is known that several sites pre-dated their first formal development - for example Shirenewton was previously a privately owned site and several Pembrokeshire sites had been occupied for years by Gypsy-Travellers before their development by the local authority.

⁹ This English comparison, and all others in this section, comes from Pat Niner, *Local Authority Gypsy/Traveller Sites in England*, ODPM, 2003

Table 2.3: Age of Site

Date of development	Number of sites	% of sites Wales	% of sites England
Before 1970	2	11	6
1970 to 1979	2	11	32
1980 to 1989	9	47	32
1990 onwards	6	32	30

Source: Table 2.1 and Pat Niner, *Local Authority Gypsy/Traveller Sites in England*, ODPM, 2003

2.13 Broadly four-fifths of the sites in Wales were developed during the 1980s or 1990s with almost half developed in the 1980s. In England a higher proportion pre-date 1980. Other things being equal - simply on the basis of site age - we might expect sites in Wales to be better physically than those in England.

2.14 Size of site seems to have increased over time in Wales:

Developed before 1970	14.5 pitches average
1970 to 1979	22.5 pitches average
1980 to 1989	19.7 pitches average
Developed 1990 onwards	25.5 pitches average

2.15 This again is different from England where average size actually declined over time from around seventeen pitches for sites developed before 1980 to just over fourteen pitches for sites developed from 1990 onwards. It is not immediately clear why this difference should be so marked - nor indeed is it possible to identify reasons why Welsh and English sites differ so much in type, size and age. The implication seems to be that Welsh authorities responded to the site provision duty (between 1970 and 1994) later than English authorities, and chose to develop fewer, larger sites when making provision.

2.16 The site provision and management survey showed that nine Welsh sites have been refurbished at least once since their development. Sometimes the refurbishment involved site extension. One of the sites built in the 1960s has been refurbished, as has one of those built in the 1970s. Six of the nine sites built in the 1980s have been refurbished. In all, five sites initially built before 1990 have not subsequently been refurbished.

Pitch Occupancy

2.17 Not all the pitches identified above were occupied at the time of the survey.

2.18 All sites have residential pitches. On eleven sites, all residential pitches were occupied. There were unoccupied pitches on eight sites (42%):

Carmarthenshire (Penybryn):	4 residential pitches vacant
Gwynedd (Llandygai):	4 residential pitches closed
Merthyr Tydfil (Glynmill):	1 residential pitch vacant
Neath Port Talbot (Briton Ferry):	2 residential pitches vacant
Pembrokeshire (Catshole Quarry):	1 residential pitch vacant
Pembrokeshire (Under the Hill):	2 residential pitches vacant and 4 closed
Pembrokeshire (Waterloo):	4 residential pitches closed
Wrexham (Ruthin Road):	4 residential pitches vacant and 1 closed

2.19 There are transit pitches on seven sites. All pitches are occupied on three of these (Blaenau Gwent Cwmcrachen, Pembrokeshire Catshole Quarry and Torfaen Shepherd's Hill). Transit pitches are not fully occupied:

Gwynedd (Llandygai):	12 transit pitches closed
Neath Port Talbot (Caegarw):	2 transit pitches vacant
Neath Port Talbot (Briton Ferry):	2 transit pitches vacant
Rhondda Cynon Taf (Beddau):	1 transit pitch vacant

2.20 Thus overall there were thirteen residential and twelve transit pitches closed, and fourteen residential and five transit pitches vacant. Together these represent 7% of residential pitches and 52% of transit pitches. Closed pitches (residential and transit) represent 6% of all pitches; vacant pitches represent 5% of all pitches. Pitch closure has the effect of reducing the total number of pitches from 404 to 379 pitches.

2.21 Lack of demand was the single most significant reason given for vacant/closed pitches (six sites in Carmarthenshire, Neath Port Talbot, Pembrokeshire and Rhondda Cynon Taf). Other reasons each applied to one site: poor conditions, refurbishment, intended site closure and other reasons (not specified). Reflecting the mix of pitch closure and lack of demand, only three respondents expected some of their vacant pitches to be let within the next month. No-one was able to estimate when closed pitches might be back in use.

2.22 The Pembrokeshire case study illustrates some of the factors that can underlie pitch occupancy. Of the five sites, three are (virtually) fully occupied and one has a waiting list. One of the other sites is likely to close at some undisclosed date because of problems with site and environmental conditions. Pitches are no longer being let on the site. The remaining site has a majority of pitches either closed or vacant. Lack of demand reflects both location and social issues. The extended family currently occupying the site would not welcome unrelated newcomers, nor would newcomers necessarily wish to move onto the site. Thus pitch vacancies at one site cannot necessarily be seen as meeting excess demand from another site even in the same broad area.

Temporary Sites

2.23 There are two further categories of local authority 'site' which should be referred to:

- There are some temporary 'sites' where Gypsy-Travellers are being 'tolerated' on land because a court judgement prevents the local authority from evicting them. While the local authority surveys provided no direct evidence on this, indications from stakeholder interviews suggest that there are such 'sites' in Cardiff and the Vale of Glamorgan, and possibly another in Carmarthenshire. There may be others across Wales.
- Powys County Council has in previous years negotiated availability of land to accommodate Gypsy-Traveller visitors to the Royal Welsh Show in Builth Wells on a short-term, temporary basis.

Recent Changes

2.24 The last Gypsy Count Survey in Wales in January 1997 appeared to show a total of eighteen local authority official sites. The number of pitches was not given, but a total of

332 families were recorded as being on the sites at the time. The additional site is Riverside in Flintshire which opened shortly after the 1997 count. The Penybryn site in Carmarthenshire replaced the Morfa site included in the last count. On the crude assumption that the number of families counted in 1997 equates with the number of pitches occupied at the time, there appears to have been a modest increase in the number of occupied pitches since then.

2.25 Only three authorities responding to the survey (Gwynedd, Powys and Rhondda Cynon Taf) said that there had been any change in local authority site provision over the last five years. The future of the Beddau site in Rhondda Cynon Taf (not a designated site) is currently unresolved. The site was agreed for closure in 1998 and the number of caravans has been reduced (currently four). The Gwynedd site has been improved; it was managed by the Gypsy Council but they have terminated the arrangement. There were many unoccupied and closed pitches at the time of the condition survey. A single family site in Powys is no longer an official site.

Future Plans for Sites

2.26 Most authorities expect there to be no change in local authority site provision over the next five years. Four authorities (Conwy, Flintshire, Monmouthshire and Powys) anticipate an increase in the number of sites, while two authorities (Blaenau Gwent and Cardiff) anticipate an increase in the number of pitches; Monmouthshire does not currently have a site. Gwynedd may provide temporary sites. Pembrokeshire anticipates a decrease in the number of sites, and Torfaen a decrease in the number of pitches. One authority explicitly stated that future provision would depend on any needs identified in a needs assessment.

Private Gypsy-Traveller Sites

2.27 Despite considerable effort, it is not possible to say how many privately-owned Gypsy-Traveller sites there are in Wales at present (with or without planning permission). This section assembles the limited information available, looking first at authorised sites with planning permission and secondly at unauthorised site developments without planning permission.

Authorised Private Sites

2.28 In the preliminary survey which was aimed at establishing the sample frame for the condition survey, only two authorities - Flintshire and Torfaen - said that there were private sites in their area with planning permission. The Torfaen site has ten pitches and is occupied by its owner and his extended family. The Flintshire site is thought to have about twelve pitches and appears to be operated on a more commercial basis - it is owned by a man who also owns several caravan sites and has other business interests - although residents could again be mostly related. By the time of the general policy survey, planning permission had been granted also for a single family site in Wrexham following a protracted planning application and enforcement process.

2.29 The 1997 count included five private sites (two in Carmarthenshire; and one each in Flintshire (not that referred to in 2.28), Powys and Torfaen). Of these only the Torfaen site was acknowledged by local authority respondents in the preliminary survey. Specific questions aimed to see what had happened to the other sites produced limited information - for example one of the Carmarthenshire sites is vacant at present, the other (two families in 1997)

still exists; no-one had any information on the Flintshire site during case study interviews; the single family site in Powys is no longer a Gypsy-Traveller site.

2.30 There are probably three main reasons which account for the lack of information:

- In most authorities Gypsy-Traveller site provision is not a major issue or policy priority. In some authorities, no-one has overall responsibility for Gypsy-Traveller accommodation issues (see Chapter 3) and in the absence of the regular caravan count there has been no need to assemble or update information.
- Questions were framed in terms of Gypsy-Traveller sites. Many authorities seem not to regard single family owner-occupied developments as 'sites' and do not record them as such.
- Planning permissions and site licences may not explicitly identify caravan sites where Gypsy-Travellers live as Gypsy-Traveller caravan sites. This was certainly true of one private caravan site in Llandeilo, Carmarthenshire where a resident was interviewed for the research. The site owner was said to let pitches to anyone who could pay the rent and residents included at least two traditional Gypsy-Traveller households and an unknown number of New Travellers, described by the interviewee as 'hippies'. A similar situation was described by a local authority officer relating to a caravan site in Rhondda Cynon Taf. It is likely that other 'caravan' sites (rather than park home estates) across Wales also accommodate Gypsy-Travellers.

2.31 Bearing these factors in mind it is probably true to say that the number of private 'sites' is not only unknown but also unknowable.

2.32 Welsh Assembly Government provided information on recent planning appeals where planning permission had been granted. In addition to the Wrexham site already noted, these relate to a two caravan owner-occupied site in Newport (personal planning permission granted) and a further family site (mobile home and caravans) also in Newport (planning permission apparently not granted but enforcement period increased to two years).

2.33 Other evidence is somewhat piecemeal and not comprehensive:

- Information from the Cardiff Gypsy and Traveller Project suggests that there is a large family site in Caerphilly. This may be a licensed caravan site, not a Gypsy-Traveller site as such.
- The Community Law Partnership which frequently represents Gypsy-Travellers in planning appeals report recent successful appeals in Pontypridd (Rhondda Cynon Taf) for one family for two years, and at Llynpiod (Powys) for a twenty pitch site.
- A Gypsy-Traveller interviewed on Cwmcrachen local authority site referred to the fact that his grand-father, father and uncles had all got planning permission for family sites after long periods of enforcement, appeals etc.
- A stakeholder interviewee in the Pembrokeshire case study said that they knew of two families thought to have got planning permission to live on their own land (there was no identifiable record of these permissions from the local authority).

2.34 While far from hard evidence, these points appear to indicate that local authority returns under-estimate the number of private Gypsy-Traveller sites with planning permission, and certainly the number of Gypsy-Travellers likely to be living on private caravan sites.

A 'guesstimate' might put the number of private site pitches at around 50-70 allowing for an unknown number of owner-occupied sites. In addition, a further 15-30 Gypsy-Traveller families may be living on private caravan sites not specifically designated for Gypsy-Traveller use.

2.35 Given the lack of current information, it is perhaps not surprising that local authority respondents were unsure how numbers of private sites/pitches might change in the next five years. Fourteen of the 21 responding authorities anticipated no change in private site provision, three said they did not know. Only three authorities (Carmarthenshire, Monmouthshire and Torfaen) anticipated an increase in private provision while acknowledging that this would depend on planning decisions.

Unauthorised Development of Gypsy-Traveller Sites

2.36 The unauthorised development of Gypsy-Traveller sites without planning permission has become a major, high profile issue in England over the last few years. The indications are that it is a much less significant issue in Wales at present.

2.37 In the preliminary survey, fourteen authorities (out of 21) said that they were not aware of any unauthorised developments where Gypsy-Travellers had bought land and established a caravan site without planning permission. Six authorities (Cardiff, Carmarthenshire¹⁰, Powys, Swansea, Torfaen and Wrexham) were all aware of one unauthorised development. These were single pitch developments in Cardiff and Wrexham, three pitches in Torfaen, four pitches in Carmarthenshire and ten pitches in Powys (the number of pitches was unknown in Swansea). Two authorities (Pembrokeshire and Rhondda Cynon Taf) explicitly said that they did not know whether or not there were unauthorised developments in their area.

2.38 More specific questions in case study interviews failed to discover any further known examples of unauthorised development. As noted above, the Pembrokeshire respondent specifically said that he did not know whether or not there were unauthorised developments by Gypsy-Travellers. This comment was based on the size and nature of the area, and the visible existence of single and small groups of caravans near farms or in isolated rural areas. The case study illustrated just such an instance where a small group of New Travellers were living on the corner of a farmer's field with his knowledge and permission. In this instance the land was not owned by the New Travellers, but no trespass was involved so that it was a species of unauthorised development.

2.39 Again given the scale and rural nature of many authorities in Wales the precise amount of unauthorised development is probably unknowable. However, it is safe to conclude that there are no unacknowledged large-scale unauthorised developments. A guesstimate might put the number of Gypsy-Travellers accommodated on such developments at 25-30 (this does not include New Travellers or others developing low-impact accommodation options without planning consent). A sense of scale is given by comparison with England. For example, the January 2005 Gypsy Caravan Count showed 38 caravans on unauthorised sites on Gypsy-owned land in Rugby, and 148 in South Cambridgeshire. A stakeholder commented that the difference reflects the general lack of employment opportunities in rural Wales in comparison with parts of England where unauthorised development is more common.

¹⁰ In addition, the status of 'Tipi Valley' in Carmarthenshire, which was not included, is unclear.

SITE CONDITION

2.40 This section draws on material collected during the condition survey of Gypsy-Traveller sites in Wales carried out by Plus Property Solutions in early June 2005. All nineteen local authority sites were surveyed as was a single private site¹¹. The analyses below deal only with the local authority sites. More qualitative comments on the single private site are in paras 2.92 et seq below.

2.41 The results for local authority sites are presented in two main sub-sections. First the survey findings are used to build up a description of some features of sites in Wales. Second, the costs of remedying poor condition and disrepair are set out.

A Description of Local Authority Gypsy-Traveller Sites in Wales

2.42 The description first examines site location and environment, then looks at features of the sites, at pitch characteristics and finally at amenity units.

Site Location and Environment

2.43 It is commonly said of Gypsy-Traveller sites that they are located in areas which, because of isolation and/or environment, would not be thought suitable for other residential uses.

2.44 In Wales, fifteen of the nineteen sites (79%) are located on the fringes of a town or village, and three (16%) are in rural areas. Only one site (in Swansea) is purely within an urban area. This distribution is broadly similar to that found for sites in England. Welsh sites are, however, rather more likely than those in England to be adjacent to industrial or commercial land uses (almost half compared with just over a quarter), and less likely to be neighboured by purely rural land uses (two-fifths compared with three-fifths).

2.45 The majority of sites are more than one kilometre from a primary school (all except one), a post office (all except two) and public transport (all except five). However, very few sites are more than five kilometres from these facilities. The sites which are most remote on these measures are Llandygai (Gwynedd) and Withybush (Pembrokeshire).

2.46 A particular issue explored was the previous land use of the site, seeking to confirm or refute anecdotal evidence that many sites in Wales are on land previously used for industry or landfill which could create problems of pollution or contamination. This part of the survey was not very successful since the surveyors were unable to establish previous land use in twelve cases (63%). Of the seven sites where information was available, three were found definitely to be on previous refuse tips but none were located on previous industrial or commercial land. Indications from the case studies suggest that several more sites are either on or near landfill sites and on previous industrial or commercial land, but precise numbers are still lacking.

2.47 Surveyors noted the presence of specific problems in the local area around the sites. The categories used were the same as used in the English site survey and were in turn those used in the English House Condition Survey 2001 (there was no equivalent question in the Welsh House Condition or Living in Wales Surveys). Table 2.4 compares sites in Wales and

¹¹ A second private site was to have been included in the survey, but surveyors were unable to establish effective contact with the site owner or agent to arrange access.

England, and the English housing stock. The figures represent the percentage of sites/houses which have a problem on the specified measure.

2.48 As can be seen in Table 2.4, Gypsy-Traveller sites in England were significantly more likely to experience problems in their local area than the English housing stock as a whole. The table also shows that Welsh sites are significantly more likely to experience problems in their surrounding area than English sites. This might suggest that Welsh sites are located in generally more unattractive areas than sites in England, and may reflect the greater likelihood of industrial or commercial neighbours. More than half of all sites in Wales experience problems from heavy traffic and/or litter/rubbish/dumping in their locality. Only four sites (Shirenewton in Cardiff, Withy Beds in Powys, Beddau in Rhondda Cynon Taf and Shepherd's Hill in Torfaen) suffer none of these problems to a serious extent; these sites are also all within five kilometres of primary schools, post offices and public transport.

Table 2.4: Problems in the Local Areas

Factor	% assessed as a problem (score 3-5 on a 5-point scale where 1 = no problem and 5 = major problem)		
	Gypsy-Traveller sites		English housing stock 2001
	Wales	England	
Heavy traffic	58	30	17
Litter/rubbish/dumping	53	36	12
Scruffy gardens/landscape	37	18	13
Vandalism	37	15	7
Ambient air quality	26	13	12
Intrusive industry	21	10	4
Dog excrement	16	12	8
Graffiti	16	7	7
Intrusion from motorways/arterial roads	11	16	11
Vacant/derelict site/buildings	11	10	3
Nuisance from parking	11	6	24
Non-conforming land uses	11	4	3
Railway/aircraft noise	5	18	9

Source: Condition survey and Pat Niner, *Local Authority Gypsy/Traveller Sites in England*, ODPM, 2003

2.49 Almost three-fifths of sites (58%) were assessed as suffering from problems from adjoining land uses or activities to some extent. The most common problems are motorways or major roads (seven sites) and industrial/commercial activity (five sites). One site each had problems from a railway line, sewage works and rubbish tip. Some more qualitative comments flesh this out a little. For example, the surveyor has noted that the elevated M4 'curls round the site' at Briton Ferry in Neath Port Talbot, while Glynmil in Merthyr Tydfil is actually islanded between the north- and southbound carriageways of the A4060.

2.50 Despite these various problems, surveyors assessed the visual quality of the local area around the site as very good for two-fifths of sites and as good for a further fifth. Almost a fifth were judged average or poor. One site was judged to be poor (Rover Way in Cardiff) and one to be very poor (Briton Ferry in Neath Port Talbot). Three sites were judged to be better than their local area, seven much the same and nine to be worse.

2.51 The picture built up is that many sites in Wales are located in relatively poor environments and in areas rather different from the bulk of the housing stock. There is some truth in the stereotype of sites being located in generally undesirable locations.

Site Characteristics

2.52 This sub-section looks at the size, design and visual quality of sites. It then examines problems on sites. Various site characteristics: access, boundaries, entrances, site roads and footpaths, parking arrangements, infrastructure, fire precautions and communal facilities and premises are described.

2.53 Sites ranged in **size** from 1,400 to 33,630 square metres, with the median size at 5,800 square metres (area known for all but four sites). Site **layout and design** varied¹². Surveyors either sketched the general layout or collected more precise site plans. These show a wide variety of layouts. Five sites are designed around a single spine roadway, either straight, curved or with a bend. Pitches are normally arranged on either side of the roadway. Another fairly common layout is a frying pan or loop (or near loop) of internal roadway (four sites). In two instances the pitches are on the outside of the loop only, but the core central area does not appear to be developed as a particular community feature - this style of layout may be aping traditional inward facing patterns for Gypsy trailers in informal camps. Another design variant which appears several times is a spine road with one or more cul de sac offshoots at right angles on one side. Shirenewton, the largest site with 56 pitches, is laid out with a series of cul de sacs off a cross spine roadway. This provides a degree of seclusion and privacy for pitches in each enclave and - from resident and stakeholder comments - seems to work extremely well with a mixed resident population.

2.54 Visual quality of the site was judged to be very good for four sites (21%), good for three (16%), average for six (32%), poor for four (21%) and very poor for two (11%: Rover Way in Cardiff and Llandygai in Gwynedd). Higher proportions were judged poor or very poor than in England (only 11%). Factors affecting the immediate visual appearance of a site, as well as living quality, is the overall treatment of pitch boundaries and pitch surfaces. Pitch boundaries are clearly indicated on all but three sites, although they are not treated consistently on three others. The quality of pitch surfaces across the site was judged to be very good on four sites, good on six, average on four, poor on three and very poor on two (Llandygai in Gwynedd and Waterloo in Pembrokeshire).

2.55 Specified **problems** were evident on all but two sites (Caegarw in Neath Port Talbot and Shepherd's Hill in Torfaen), with a 'problem' counting as a score of 3 or more on a scale where 1 = no problem and 5 = a major problem. The main problems, affecting five sites or more are:

Litter/rubbish/dumping	11 sites
Vandalism	9 sites

¹² It is not possible to make comparisons with English sites on design and layout as sketches were not required in the English survey.

Evidence of rats/vermin	8 sites
Dog excrement	6 sites
Heavy traffic	6 sites
Vacant/derelict buildings	5 sites
Intrusive industry	5 sites
Scruffy gardens/landscape	5 sites

2.56 Clearly litter, rubbish and/or dumping is the most frequently met problem, but quite closely followed by vandalism (origin unknown) and evidence of rats/vermin. Incidence of these problems seems slightly higher than was found in England. Looking at these findings in relation to site management shows that there is no simple relationship with frequent on-site management presence although three of the seven sites which suffer from both rubbish and rats/vermin are in Pembrokeshire where site management tends to be remote (see Chapter 3). Surveyors attributed site problems mainly to wear and tear although inadequate maintenance was also cited on four sites.

2.57 Seven sites are **accessed** by means of a private road, the remainder from a public highway. Access to the site was less than 5 metres wide on six sites. Access was judged to be unsafe on three sites. Only four sites were found to be adequately signed.

2.58 Site **boundaries** are somewhat contentious. Clear fences or other barriers can look like a prison camp or can be seen as protective screening, depending on point of view. Eleven sites (58%) are fully contained on all sides. Eleven sites (58%) have some form of earth bank on one or more sides of the site. Fifteen sites (79%) have trees and/or shrubs on the boundary. Thirteen sites (68%) have some form of fence or wall at some point along the boundary. Some boundary treatments are apparently simple - a bank and shrubs - while others comprise a variety of fencing and screening materials. Only one site (Shirenewton) is noted as having an unprotected watercourse on the boundary - a specific danger for child safety and/or pollution risk.

2.59 Almost half the sites (nine) have no form of **entrance** gate or barrier or building from which entry (and exit) might be controlled. Six sites have a metal barrier, one has a metal gate and three have some form of building at the entrance. The entrance was judged to be visually good on six sites, average on nine and poor on four.

2.60 The rather dated Department of the Environment site design guide¹³ recommends that **site roads** should be not less than 5 metres wide to allow caravans to be manoeuvred into position on pitches. Six sites (32%) have roads less than 5 metres wide (one site has no internal site roads at all since pitches are directly accessed from a public highway). Thirteen sites (67%) have adequate turning circles. Only two sites have no form of traffic calming measure on internal roads. One site has bends and chicanes as a traffic calming measure, the rest have speed bumps. Where provided, all traffic calming measures were judged to be effective. Most site roads are constructed of tarmac with three using concrete and one crushed concrete.

2.61 Seven sites have no **footpaths** on the site. Of the twelve that do have footpaths, in five cases the footpaths are not 0.75 metres wide as recommended in the site design guide. Ten sites of the nineteen are judged to have safe vehicle/pedestrian segregation. In this respect, Welsh sites are much better than their English counterparts. Site lighting is adequate on twelve (63%) of the sites. However, only five sites (Blaenau Gwent Cwmcrachen, Cardiff Shirenewton, Merthyr Tydfil Glynmil, Pembrokeshire Kingsmoor Common and Swansea Tygwyn) are judged to be suitable for disabled access and movement.

¹³ Department of the Environment, *Gypsy Sites Design Guide*, DoE, 1979.

2.62 Some formal **parking** provision is made in addition to space within pitches on eleven (58%) sites, but additional parking facilities were thought to be needed on eleven sites (58%). No garages are provided on sites.

2.63 Site **infrastructure and utility supply** is as follows:

- All sites have an adequate water supply. Two sites provide standpipes in addition to supply to pitches.
- Fifteen sites are linked to mains sewers. The sites which are not are Shirenewton in Cardiff, Withybush in Pembrokeshire, Beddau in Rhondda Cynon Taf and Caegarw in Neath Port Talbot. The last has a treatment plant; the others have cesspool or septic tank arrangements. There is no evidence of problems arising (but see resident comments which were very critical in para 2.114).
- All sites have a mains electricity supply. All cabling is underground except at Beddau in Rhondda Cynon Taf. The supply is adequately earthed except at Llandygai in Gwynedd. There were no signs of unauthorised connections at the time of the survey.
- There is no mains gas supply, but LPG is used on all sites. LPG storage facilities are provided on six sites. LPG is stored in accordance with health and safety requirements on ten sites.
- The effectiveness of surface water drainage is good on ten sites, fair on seven and poor on two (Penybryn in Carmarthenshire and Llandygai in Gwynedd).
- Refuse disposal facilities are adequate on all but four sites.

2.64 Model standards deal with **fire precautions** for caravan sites. They require fire points to be provided and specify their spacing and equipment. Fire points are not provided on six sites (32%). Those provided are not adequate on five sites. Reasons for inadequacy include inadequate equipment, poor maintenance and poor labelling and/or notices.

2.65 No fire fighting equipment is provided on seven sites (37%). Hose reels are most commonly provided (eight sites) followed by extinguishers (four sites). There is a fire alarm on two sites only.

2.66 Model standards for caravan sites require all caravans to be at least six metres apart. Surveyors checked whether it was possible for caravans to be separated by six metres rather than whether they actually were so separated. Separation was possible on only eight sites (42%). This is a very different picture from England where six metre separation was possible on 91% of sites. It is not clear why the difference should be so great, but it suggests greater crowding of pitches and sites in Wales. The measure used in both cases related to all caravans rather than those in separate occupation - the case studies suggest that it is sometimes hard to determine just what should be counted as separate occupation where trailers on the same pitch are occupied by extended family members essentially living as distinct households.

2.67 These findings suggest that sites often do not meet basic fire safety standards required for caravan sites.

2.68 **Communal provision** of facilities and premises on sites is relatively rare. Communal work areas are provided (and are used) on one site only (Kingsmoor Common in Pembrokeshire). No communal stores are provided. Grazing land is provided only at Shepherd's

Hill in Torfaen. Additional grazing land was thought by the surveyors to be required on six sites. Additional open land is provided on nine sites. A public telephone is provided only at Tygwyn in Swansea; it was working at the time of the survey. Play areas are provided on four sites only (Glynmil in Merthyr Tydfil¹⁴, Withy Beds in Powys, Tygwyn in Swansea and Shepherd's Hill in Torfaen). In each case the play area was used and judged safe. Play areas were thought to be needed on eleven sites. As will be seen below, this was a universal plea from site residents. A warden's office is provided on five sites, and a pre-school education facility on one.

Pitch Characteristics

2.69 A total of 379 pitches were included in the condition survey on local authority sites. This sub-section describes pitch shape and size, ground surfaces and boundary treatment, and drainage.

2.70 In **shape**, the majority of pitches (61%) are oblong, 30% are irregular in shape or random and 8% are square. Compared with England, irregular pitches are more common in Wales perhaps because of different site shapes or layout.

2.71 There is no standard for **pitch size**. The site design guide recommended that pitches should be not less than 12 metres wide in order to allow some flexibility in the arrangements of the living trailer(s) and other vehicles. Almost half of pitches (47%) are less than 12 metres wide, and 27% are less than 10 metres wide. The median width is 11 metres. The median pitch width in England is 12 metres; around 40% of pitches are less than 12 metres wide and 15% less than 10 metres wide. Thus Welsh pitches are, on average, narrower than their English counterparts. However, they are not smaller overall. The median area of pitches in Wales is 198 square metres (195 square metres in England). A fifth of Welsh pitches have an area less than 130 square metres, compared with a quarter in England. Just four pitches (three on Beddau in Rhondda Cynon Taf and one on Withy Beds in Powys) were judged to be inadequate in general size and shape.

2.72 The majority of the **surface** of most pitches is hard, designed for the stationing of caravans and other vehicles. Concrete is rather more common as a surfacing material than tarmac. Just over a quarter of pitches (27%) include some element of grass or earth. Fourteen pitches (4%) contain a designated work area.

2.73 As noted above (2.54), **pitch boundaries** are clearly demarcated on all but three sites. Concrete blocks are the most common fencing/walling material followed by brick walls, ranch style timber fences and hedges. About three in ten pitches have an entrance gate. The case studies suggest that gates are sometimes provided by residents rather than the landlord.

2.74 Very few pitches (2%) suffer **problems** with natural flooding. Surveyors judged surface water drainage to be adequate on 93% of pitches.

Amenity Units

2.75 Traditionally Gypsy-Travellers have preferred not to use toilet or bathing facilities within their trailers/caravans. Gypsy-Traveller sites therefore provide such facilities in separate amenity unit buildings. Most sites provide an individual amenity unit on each residential pitch for the private use of pitch residents. Individual amenity units are not provided on all transit

¹⁴ This is a central open grassed area, not specifically designed as a play area.

pitches - indeed some have very little in the way of formal provision beyond open space. The great majority of amenity units (94%) are brick or block built with a pitched roof.

2.76 The 1979 DoE site design guide did not recommend a minimum **floor area** for amenity units although specimen drawings of layout and accompanying comments suggest a preference for units including a day-room as well as a bath or shower and a separate WC. Comments in the guide suggest around 9 square metres as a desirable minimum floor area. The median size of amenity units in Wales is 11 square metres (compared to 10 square metres in England). Just over one in ten amenity units in Wales is smaller than 9 square metres (about 30% in England). Over a fifth (22%) of amenity units in Wales have an area of 15 square metres or larger, similar to the units including a day-room illustrated in the guide. This compares with only 15% in England. Thus on this measure, Wales has higher space standards than England.

2.77 The design guide makes some **layout** recommendations. A bath/shower should be provided separate from the WC. Provision appears to be separate in 45% of amenity units. Almost two-thirds of units have a bath and a third a shower. Gypsy-Traveller cultural requirements suggest that the access to a WC should be kept quite separate from an area where food is prepared. Where arrangements are recorded, 31% of WCs are accessed from the kitchen area and 69% from the outside. This is a much higher proportion with access from outside than was found in England. It may reflect the greater involvement of the Gypsy Council or other consultation with Gypsy-Travellers in site design in Wales. Almost all amenity units were judged broadly fit for purpose; the exception was Beddau in Rhondda Cynon Taf which is not a specifically designed Gypsy-Traveller site (residents, however, had complaints about amenity units on some sites, see 2.121). Disabled access is very unusual - evident in only 4% of units.

2.78 The general **condition** of 36% of amenity units was judged to be good, 37% were judged average and 27% poor. Some units were found to be poor on ten sites. Vermin problems are apparent in 10% of units on four sites. Some units were assessed as needing total replacement on three sites; this affected fifteen units on Llandygai in Gwynedd, Under the Hill in Pembrokeshire and Beddau in Rhondda Cynon Taf. One hundred and two amenity units (just over a quarter) were thought to need refurbishment. This affected units on nine sites including all Pembrokeshire sites, Cwmcrahen in Blaenau Gwent, Llandygai in Gwynedd, Glynmil in Merthyr Tydfil and Tygwyn in Swansea. Some of the problems found in amenity units on these sites were attributable to inadequate maintenance as well as general wear and tear.

Local Authority Site Condition and Costs

2.79 The main aim of the condition survey was to assess how much needs to be spent now and over the next 30 years to bring the local authority site network in Wales up to standard and to maintain those standards. Plus Property Solutions used a methodology similar to that used in England, which in turn was based on approaches used in stock condition surveys in bricks and mortar housing. Sites, pitches, amenity units and other buildings on site were broken down into their various construction elements. The condition of each was surveyed in the field. Condition problems were converted into costs for remedial action using cost tables and estimated 'lives' for each element. The schedule used is in Appendix 1. This shows the elements surveyed and the costs and 'life' assumed where appropriate.

2.80 There are some background points to be made:

- In most instances, surveyors have costed maintenance work on a 'like-for-like' replacement basis. There are some provisions for improvements where missing items can be provided. This includes entrance barriers, additional signage, traffic calming measures, fire alarm systems, site lighting and fire equipment. In addition, surveyors assessed the potential need/desirability of redesigning a site layout to enable a more efficient and/or safe usage of the available site area. Improvements do not, however, include the replacement of amenity units simply because they are smaller than the ideal, nor indeed any fundamental redesign which might be desirable to create larger (but fewer) pitches.
- All surveys were visual and non-intrusive. No testing of materials or installations was undertaken, including incoming mains services and underground drainage. Roof areas were accessed where safely possible. Costs of remedying problems which were not visually evident at the time of the survey could be significantly under-estimated¹⁵.
- All estimated expenditure is expressed in current money terms with no allowance for inflation.
- There is no allowance in the costs for ongoing routine site repairs and maintenance.

2.81 These points suggest that the costs are likely to be under - rather than over- estimates, especially where actual refurbishment would involve introducing enhanced design standards. Such works could only be accurately costed on a site-by-site basis in consultation with residents.

2.82 Thus far in this chapter, local authority sites have been analysed together. In this section it is appropriate to distinguish between sites directly managed by the local authorities and those managed by the Gypsy Council since the nature of the management agreement might affect the financing of major site works. The final column of Table 2.1 showed management arrangements for each site.

2.83 The total identified repair and improvement cost estimate for the 30 year period is £10,484,92. This represents an average annual cost of £18,395 per site per annum over the period. The total is split £7,549,844 for local authority sites (72% of the total) and £2,935,098 for Gypsy Council managed sites (28%). Transfer of Llandygai in Gwynedd from Gypsy Council to local authority management would shift the proportions to 76%/24%.

2.84 Table 2.5 summarises the 30 year cost estimates and expresses them as averages per site, and as averages per site and per pitch each year. As can be seen, average annual costs per pitch are significantly lower on Gypsy Council than on local authority managed sites. The comparable expenditure estimates in England in 2002 were £13,363 per site per annum (equivalent to about £14,600 assuming 3%pa cost inflation). However, because Welsh sites are larger on average than English sites, expenditure needs expressed per pitch are virtually identical; in Wales they are £880 compared with around £900 in England assuming 3%pa cost inflation since 2002.

¹⁵ This is well illustrated by information which has come since the condition survey about mining subsidence at Shepherd's Hill Torfaen. A Council engineering survey suggests that remediation work could cost up to £1 million, excluding costs of re-locating residents and replacing site facilities.

Table 2.5: Thirty Years Repair/Improvement Costs

Management	Total estimate	Average per site	Average per site per annum	Average per pitch p.a.
Local authority	£7,549,844	£580,757	£19,359	£995
Gypsy Council	£2,935,098	£489,183	£16,306	£679
All sites	£10,484,942	£551,839	£18,395	£880

Source: Condition survey

2.85 Total 30 year expenditure needs can be broken down between the various survey categories of works:

Environment	£73,000	1%
Site	£2,233,582	21%
Pitch/amenity units	£7,597,679	72%
Other site buildings	£130,181	1%
Improvements	£450,500	4%

As can be seen, the bulk of expenditure is needed for works to pitches and amenity units.

2.86 The cost profiles over the 30 year period show a degree of front-loading, suggesting a backlog of repairs and maintenance required on sites across Wales. The total expenditure needed by five year intervals is:

Years 1-5	£2,793,094
Years 6-10	£1,763,736
Years 11-15	£2,087,388
Years 16-20	£1,273,372
Years 21-25	£1,081,313
Years 26-30	£1,486,040

The figures suggest a need for expenditure of almost £3 million over the next five years.

2.87 Average costs per pitch per annum for the first five year period for all sites is £1,407; for local authority managed sites it is £1,607 and for Gypsy Council managed sites it is £1,056. Figure 2.2 (overleaf) shows the cost profiles over time for sites and shows that the patterns for local authority and Gypsy Council managed sites are quite different - each going in cycles as elements reach the end of their lives, but with inverse phasings.

2.88 At individual site level, the survey suggests a need to spend more than £150,000 in the next five years on six sites:

Catshole Quarry (Pembrokeshire)	£432,120
Llandygai (Gwynedd)	£297,840
Shirenewton (Cardiff)	£220,140
Kingsmoor Common (Pembs)	£219,170
Under the Hill (Pembs)	£188,522
Glynmil (Merthyr Tydfil)	£182,780

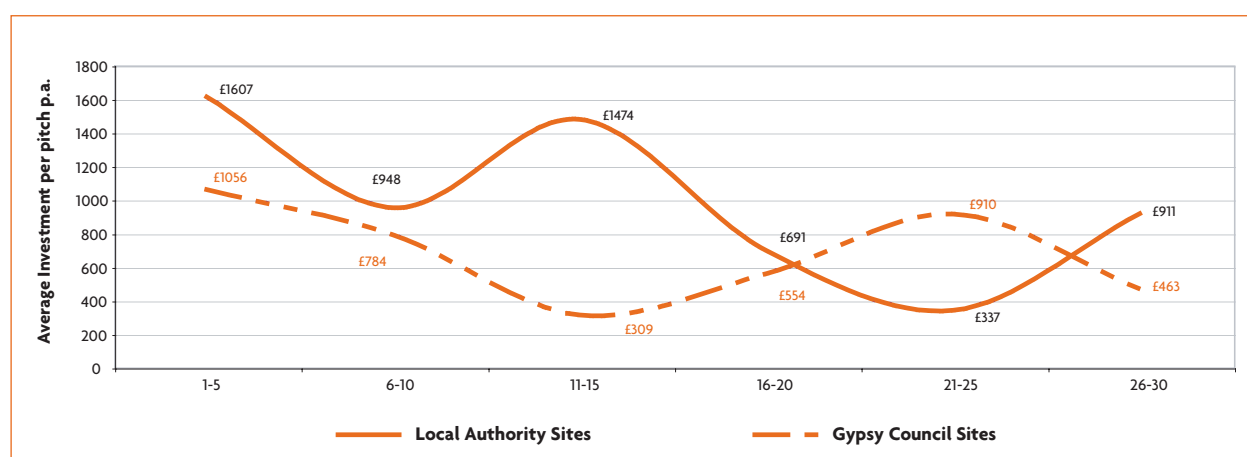
2.89 This crude need to spend does not, perhaps, give an idea of priority because it ignores site size. A number of the sites with high costs are large. Seven sites require the expenditure of more than £2,000 per pitch per annum during the first five year period. These are:

Beddau (Rhondda Cynon Taf)	£6,520
Under the Hill (Pembrokeshire)	£3,770
Tygwyn (Swansea)	£3,485
Catshole Quarry (Pembs)	£2,788
Waterloo (Pembs)	£2,570
Llandygai (Gwynedd)	£2,482
Kingsmoor Common (Pembs)	£2,087

2.90 As noted above, Beddau is not a designated Gypsy-Traveller site and its future is uncertain. The case study shows that the future of Waterloo in Pembrokeshire is also under discussion because of its condition and inappropriate location. Despite this, the prominence of sites in Pembrokeshire among those requiring expenditure is clear.

2.91 There is a relationship between site condition and vacant/closed pitches. The average per pitch per year repair costs for years one to five is £1,595 for sites with closed or vacant pitches, and £1,215 where there are no such pitches.

Figure 2.2: Analysis of Investment per Pitch per Annum



The Private Site

2.92 Only one private site was included in the condition survey. It has eight pitches and is located in a rural area up a long semi-private roadway but within five kilometres of school, post office and public transport. Neighbouring land uses are not problematic. The visual quality of the local area was assessed as very good, and the visual quality of the site itself was also assessed as very good. None of the problems of litter, vandalism, heavy traffic etc was noted on the site. Thus environmentally and in general appearance the private site ranks along with the best of the local authority sites.

2.93 The private site is occupied by its owner and members of his extended family. The style and layout is very different from the 'usual' design-guided local authority site and it is hard to judge it using the same standards. The private site is much less formally laid out than local authority counterparts with little demarcation of individual pitches, and mobile homes and caravans irregularly placed. The site road is less than five metres wide and there is no street

lighting. There is a fire point, but it is not entirely adequate; caravans are more than six metres apart. There is a space for children to play and land for animal grazing.

2.94 Most residents have mobile homes which include bathroom and kitchen facilities which they use. There is a single communal amenity block, in poor condition, for the use of any families without their own facilities.

2.95 On these measures and applying public sector expectations, the private site is sub-standard. It would need an expenditure of almost £280,000 in the next five years (about £5,500 per year per pitch) to bring it up to local authority Gypsy-Traveller site standards of amenity provision and repair. This is obviously unrealistic for the owner and his family, and it is very unlikely that all the 'improvements' would be welcome although some work on the amenity block might be. One of the more attractive features of private sites for some residents is precisely that their site lacks the formal regimentation of most local authority sites. Perhaps the most valuable result of including the single private site in the condition survey is the reminder that ideal standards of provision and design are not necessarily universal.

STAKEHOLDER VIEWS ON SITES

2.96 This section looks at perceptions of their sites expressed in the site provision and management survey by local authority personnel, and by Gypsy-Travellers interviewed as part of the case studies.

Local Authority Views

The Site Provision and Management Survey

2.97 The site provision and management survey asked local authority respondents to assess their site(s) in terms of:

- the general surroundings and environment of the site including adjoining land uses;
- location in relation to schools and shops; and
- physical condition and maintenance of the site.

Table 2.6 summarises the responses. There is quite a range of assessments. Overall, across the three criteria, there are slightly more assessments above average than below average.

Table 2.6: Local Authority Assessments of Site Quality

Assessment	Environment	Access	Physical condition
Very good	-	3	1
Good	6	5	3
Average	8	6	1
Poor	2	1	5
Very poor	3	4	3

Source: Site provision and management survey

2.98 Powys (Withy Beds), Rhondda Cynon Taf (Beddau) and Swansea (Tygwyn) are assessed as very good on access to schools and shops; Flintshire (Riverside) is assessed as very good on physical condition. Sites which are assessed as very poor are:

Environment: Cardiff (Rover Way); Pembrokeshire (Waterloo); Rhondda Cynon Taf (Beddau)

Access to schools/shops: Cardiff (Rover Way and Shirenewton); Flintshire (Riverside); Pembrokeshire (Withybush)

Physical condition: Gwynedd (Llandygai); Pembrokeshire (Waterloo); Rhondda Cynon Taf (Beddau)

2.99 There is some agreement between assessments on the physical condition of sites made by local authority respondents and condition survey surveyors. The sites requiring most expenditure per pitch in the first five years were all assessed as very poor or poor by local authority respondents (except Kingsmoor Common in Pembrokeshire).

2.100 Local authority respondents were asked to comment on any particularly good or bad points on site design and layout. Themes referred to were:

Location: points identified were mostly negative and included proximity to busy roads, remoteness from shops, 'total lack of thought as to its location' (Cardiff Rover Way) and 'close to industrial estate, built on former landfill [site]' (Pembrokeshire Waterloo). In contrast *'the site is located next to a river with a footpath and cycle path next to it, it is within walking distance of the nearest shopping facilities and the children are collected on the site by bus to be taken to school'* (Swansea Tygwyn).

Access: most comments again were negative, including *'bad vehicular access to site'* (Flintshire Riverside), long driveway access to site which can be subject to fly-tipping (several sites in Pembrokeshire), and only one access road for entrance and exit (Wrexham Ruthin Road). One comment was positive: Pembrokeshire Withybush site has separate accesses from each pitch to the public road which gives residents privacy.

Boundaries: lack of boundaries to pitches or to the site itself was noted for several Pembrokeshire sites.

Other points: other negatives noted were scope for conflict between residential and transit areas (Gwynedd Llandygai), lack of recreational space and surface water running onto site from the adjoining area (Torfaen Shepherd's Hill) and lack of pedestrian paths to separate the pitches from the access road (Wrexham Ruthin Road).

2.101 Respondents were also asked to note any good or bad points on amenity unit design and amenity provision. Almost all the comments made relate to the age and basic design of amenity units, several suggesting the need for improvement and modernisation to bring them to modern and acceptable standards. Some commented that amenity units are very small. In one instance the absence of wash hand basins in the bathrooms and lack of space to provide them was noted. The need for some form of heating was mentioned several times. The design of units on Flintshire Riverside site were noted as being good (supported by resident comments).

2.102 The case studies provided the opportunity to collect some more qualitative information about a number of local authority sites. Four themes emerged:

- Interviewees had rarely been in post when their sites were developed and were therefore unable to say much about original location and design decisions. However, it is clear from comments that at least six of the nine sites covered by case study authorities had been developed on or adjacent to areas where Gypsy-Travellers had settled or visited for many years (residents interviewed on more than one site had been in that location since before the local authority site had been built). This may be one factor to account for current site locations away from residential areas and adjacent to tips and scrap yards, reflecting earlier camp site 'choices' and proximity to potential scrap-dealing opportunities. (There may, of course, have been other more salubrious traditional stopping places which were not converted into formal sites.)
- Local authority respondents are clearly well aware of the short-comings of some sites and would like to carry out refurbishment. Lack of resources is the main reported obstacle.
- Several sites had started out as open plan with no clear demarcation of pitch boundaries. Several interviewees commented that residents greatly preferred walls or fences to give them greater privacy. On some sites residents were permitted to provide their own walls and gates, on others they had been provided by the landlord. This point was raised in Gypsy-Traveller interviews too. On one site, pitch walls had been built recently. One woman liked them very much as indicating *'this is my plot, that is your plot'*.
- The extent of Gypsy-Traveller involvement in site design is unknown for older sites. Some consultation with Gypsy-Travellers had occurred in the design of the two most recent sites in the case study areas, in one instance through the Gypsy Council. Both sites were judged to be in relatively good condition in the condition survey; both have amenity units where the WC is accessed directly from outside; both are now well regarded by their residents.

Gypsy-Traveller Views

2.103 Gypsy-Travellers were interviewed on seven local authority sites in the course of the case studies. Two of these sites had transit as well as residential pitches. Sites varied in size, location, age and condition (as evidenced by the condition survey as well as interviewers' observations). Perhaps the most striking feature of residents' comments is their variability between sites (but general consistency between views expressed by different residents on the same site) and the relationship these comments bear to site conditions and state of repair. There is no suggestion that residents and 'objective' professionals are making different judgements although it is clear from resident comments that social factors are also extremely important to their quality of life. Generally, within this very small sample, settled, 'quiet' sites tended to have higher physical standards too.

2.104 There were two themes which ran through several interviews on different sites:

- Residents mentioned the lack of children's play space on every site. As will be seen in Chapter 3, most sites include large numbers of children, and the total lack of designated and designed space where they can play safely was an issue everywhere.
- On the two sites where there are transit pitches, concern was expressed over the conditions in which families, including children, had to live. On one of these sites, residents told us that five families including twelve children were living without proper toilet facilities, shower or bath, and were paying the same rent as families on the residential part of the site. On neither of the two sites were all transit pitches actually performing a transit function. Some at least of the 'transit' pitches are acting as overspill for the residential site where families wait for an infrequent pitch vacancy and may stay for several years (in one instance for seven years - a significant period in the life of a child). On both sites, families on some transit pitches had made their own provision. On one, families had built and plumbed their own toilet blocks; on the other, two (related) families were using a mobile toilet and washroom unit owned by one of them and were intending to buy another. Transit pitches with a standpipe and shared toilet do not provide satisfactory long-term accommodation.

2.105 Other comments relating to residents' views on their sites are summarised under the headings environment and location; size and design; infrastructure and services; and pitches and amenity units.

Site Environment and Location

2.106 Few comments were made about site environment and location. Such comments as were made tended to be site specific as might be expected.

2.107 A quotation from a resident on the site attracting most criticism is a damning indictment of locational choice:

'There is no worse place that you could build a site. It used to be a household rubbish tip with gravestones dumped on it when they moved the cemetery [poor souls!]. It's near the off shore - not a nice seaside like you'd imagine - but covered in black muck left from the tides. Until recently there used to be a steel works close by and they also used to tip old brake shoes from Bert's scrap yard - he was contracted by the steel works - so we used to have asbestos tipping as well.'

The site is not served by a bus. The only really good thing noted about the location was 'people know us here'. One interviewee thought that the site should be closed down.

2.108 The other site attracting criticism was relatively remote from schools, shops and other services but this was not commented on. In this instance problems were caused by the approach (public) road down which lorries speed to a landfill site.

2.109 An otherwise very popular site was said to be subject to occasional very bad smells at night. People did not know what caused these; there are industrial and commercial premises close by.

2.110 Given the problematic environments of many sites noted in the condition survey, the general lack of comment is interesting.

Site Size and Design

2.111 Few comments also related specifically to site size and design. A resident on one site commented that the design was wrong for the location, leaving the site very exposed to wind and weather. Their theory was that it had been '*built wrong*' initially because the architect had taken a sketch of another nearby site and simply applied it without regard for the terrain. Another site was said to have very heavy internal traffic, partly at least attributable to the internal road system.

2.112 Site size was very rarely discussed. One resident felt her site was about the right size, while acknowledging that an extension might help accommodate more Gypsy-Travellers in need. On another site a resident commented that site extension would only be acceptable '*if we know the people*'. Interestingly no-one commented adversely on the very large site or suggested that it was too big. Here the site layout breaks down the whole into smaller units which seems - by implication - to work well.

Site Infrastructure and Services

2.113 Site infrastructure and services easily merge into issues of site management since a problem is likely to be seen as more serious if it is not dealt with quickly. The main issues about facilities on transit pitches and lack of children's play space have already been noted.

2.114 Residents on two sites reported problems with flooding from sewers. In one instance this may have been a blockage. In the other it was related to a cesspool which is normally emptied twice a week. Rats were reported on these and one other site.

2.115 Other issues were:

- On all sites, electricity is paid for by cards bought from the local authority or from machines located in known shops. In one local authority the cost of electricity was a major issue (see Chapter 3). On one site, the supply was said to be inadequate to allow use of an electric cooker.
- Fire precautions and equipment were mentioned only once. A resident said that fire extinguishers had been promised but had not been supplied. The fire hose was said to be too short to reach all caravans.

Pitches and Amenity Units

2.116 Pitch size and the provision of amenity units on Gypsy-Traveller sites is based on implicit assumptions about family size and number of trailers and other vehicles in use. While the research did not include an occupancy survey, the interviews do show how intensively some pitches are occupied and the strain placed on amenities.

2.117 Most of the families interviewed had more than one living trailer on their pitch. A common pattern is a large living caravan or mobile home plus a smaller touring caravan which is where children play and older children sleep at night. Some pitches however accommodate much more than this. For example, one interviewee lives in a trailer on a pitch also occupied by her father in a trailer and her disabled brother in a chalet. On another site the interview took place in a chalet; another chalet includes a bathroom and there is also a trailer belonging to a son and a camper van. One unusual site with large open plan plots was intensively used - for example on one such pitch there is a chalet and caravan owned by the

interviewee's mother, her aunt's caravan, her own mobile home with decking and her brother's caravan now used for storage. All this means that seven people have to use a single toilet. It is not clear whether this general pattern of extended families living on the same pitch is a reflection of choice or of shortage of alternative accommodation. In some instances it appears to be choice, and in others necessity. It does suggest, however, that larger pitches are an advantage. One interviewee noted that it was a good idea to have varied sizes of pitches on a site to suit different families.

2.118 Privacy can be an issue on sites, affected by the layout and spacing of pitches. A couple of interviewees had corner or edge plots, and said that this gave them greater privacy and quietness: *'you've got your own privacy - nobody can see your business'*. One woman said that pitch arrangement affected her socialising on site - she did not want to get too close to her next-door neighbours who could see into her plot, but tended to have more contact with people further away: *'if you're in your house you want your privacy. You don't want [to see] your neighbours every time you look out . . . '* Social distance was being substituted for physical distance.

2.119 It is apparent that families use their amenity units in different ways. For example, three women interviewed on one site all differed slightly in this: one used the bathroom and WC in the amenity unit but cooked in the trailer which did not have a bathroom or WC; another used the amenity unit facilities and also cooked there; the third used bathroom and toilet facilities in her mobile home and used the amenity unit for her washing machine and dryer and as storage - this woman liked the amenity unit very much and said *'it's like a house - you've got all the convenience of a house'*. Several families appear now to use bathroom and toilet facilities in their own chalets, mobile homes or trailers which may suggest a change in cultural habits as well as evidence of increasing standards of trailers.

2.120 Even if amenity units are not always being used as initially intended, there was no suggestion at all that people would like to do away with them. Storage space is at a premium in trailers, and the units are valuable as storage space. The importance of having space to wash and dry clothes is also very clear - washing machines figured in several interviews with women, as might be expected with large families and several children. Most comments suggested that families would like larger amenity units. Some would like to be able to cook there. To make them usable, heating needs to be improved - lack of heating was an issue on one site in particular.

2.121 Several interviewees were critical of the standard of their amenity unit and fittings, and would like them to be repaired and improved. On one site, residents were very critical of their amenity units as cold and damp and subject to mould growth; these units lacked ceilings (they were open to the under-side of the roof) which marked them as different from mainstream housing. A slightly different source of comment was where residents on other sites had had work done, or in one instance, where different residents on the same site were felt to have been treated differently.

2.122 All these points draw attention to the importance of consulting residents in drawing up site improvement schemes and possibly being flexible in responding to individual needs and preferences - so long as this can be done in a way accepted as fair to everyone.

3. SITE MANAGEMENT AND FINANCE

3.1 The previous chapter looked at the existing network of Gypsy-Traveller sites in Wales. Inevitably it concentrated most on local authority sites. This chapter looks at how those local authority sites are managed; this in part affects the role they play. It deals first with the organisational arrangements for site management, then at policies, procedures and issues. The final section looks at site finance.

3.2 The main data source is the site provision and management survey completed by local authorities over the summer/autumn of 2005. The analysis covers all nineteen sites in Wales. Analysis includes the Beddau site in Rhondda Cynon Taf which is not a designated Gypsy-Traveller site but is exclusively occupied by Gypsy-Travellers. The survey information is amplified where appropriate by material from the case studies, and comments from Gypsy-Traveller interviews are inserted at various points.

ADMINISTRATIVE ARRANGEMENTS FOR SITE MANAGEMENT

3.3 As shown in Table 2.1 above, six of the nineteen sites in Wales are managed by the Gypsy Council under an agreement with the local authority owner. The remainder are managed in-house by local authority staff. This section looks first at the nature of the arrangements where the Gypsy Council is involved, then at arrangements for in-house management. The final sub-section covers staffing issues for all sites.

Gypsy Council Managed Sites

3.4 The sites managed by the Gypsy Council are Riverside (Flintshire), Llandygai (Gwynedd), Glynmil (Merthyr Tydfil), Caegarw and Briton Ferry (Neath Port Talbot) and Shepherd's Hill (Torfaen). The management agreement in Gwynedd which commenced in 2001 has recently been terminated. The reason for termination given by the Gypsy Council is the extremely poor state of repair at handover and the extent of vandalism which mean that the site is not viable. The Gypsy Council note a perceived lack of interest and support by the local authority. Gwynedd County Council is now reviewing its approach.

3.5 As with any service contracted by a local authority, there are potential issues around the nature of the site management agreement with the contractor and its enforcement. A series of questions in the site provision and management survey was designed to identify the split of responsibilities and contract arrangements between the local authorities and the Gypsy Council.

3.6 Authorities reported a formal contract between the Council and the Gypsy Council specifying the standard of service to be provided for five of the six sites (the exception is Torfaen). The contract/management agreement is said to be formally monitored for one site (Flintshire) and informally in Neath Port Talbot and Torfaen. There are said to be no monitoring arrangements in Gwynedd and Merthyr Tydfil. Monitoring is the responsibility of the Director of Housing and Community Services in Flintshire and of the Estates and Valuation Manager in Neath Port Talbot; no single officer has responsibility in Torfaen.

3.7 Table 3.1 shows which body is responsible for a number of specified management decisions and actions.

Table 3.1: Split of Site Management Responsibilities between Local Authorities and Gypsy Council

Task	Local authority	Gypsy Council	Joint
Determining staffing levels for management	-	6	-
Deciding the terms of the site licence	1	1	4
Determining pitch allocation policies	-	5	1
Allocating pitches	-	6	-
Evictions	-	6	-
Setting rents/licence fees	-	6	-
Setting day-to-day repairs budgets	-	6	-
Authorising day-to-day repairs	-	6	-
Setting budgets for planned maintenance	-	6	-
Authorising planned maintenance	-	6	-
Assessing need for site improvement/refurbishment	-	3	3
Authorising site improvement/refurbishment	-	2	4
Liaison with neighbours in settled community	-	2	4
Liaison with health, education services etc	-	2	4

Source: Site provision and management survey

3.8 As can be seen, the Gypsy Council has considerable autonomy in making everyday site management decisions, including decisions as to who comes to and leaves the site and the rent to be charged. Other than liaison responsibilities, the main areas where local authorities have an input are deciding the terms of the site licence, and assessing the need for and authorising site improvement/refurbishment.

3.9 The Riverside site in Flintshire is managed by a Gypsy-Traveller manager¹⁶ on behalf of the Gypsy Council. He is one signatory to a tri-partite management agreement along with the County Council and the Gypsy Council. The agreement is terminable by either the County Council or Gypsy Council on 28 days notice. The main effect of the agreement is to give total autonomy to the Gypsy Council/site manager on all day-to-day management matters. The arrangement is that the Gypsy Council sets the pitch fees and keeps all revenues for site improvement and management; the local authority neither gives nor receives any revenue moneys. The agreement is silent on the funding of any necessary major repairs or improvements - the issue has not arisen since the site was only completed in 1997 and is in good condition (as evidenced by the condition survey). The County Council should be informed about new residents and notified in advance of any proposed evictions. There is no

¹⁶ It is understood that the site manager involved in the research has now left and been replaced.

record of any information being passed to the authority on any matter although there appear to have been some changes in tenancy (but no evictions). Contract monitoring is very low key, and the officer primarily responsible thought that it would be difficult even to get independent information to indicate when an intervention was needed, never mind trying to 'enforce' the agreement if problems arose. There have never been any complaints to the local authority about site management and the site is felt to be very well managed.

3.10 Interviews with site residents certainly reinforce the picture of a well managed site. Interviewees were more content and appreciative of the manager than those on any other site included in the research. All interviewees thought that their site was a private one. None were aware that it was actually owned by the local authority (or indeed that the Gypsy Council was involved) so it is unlikely that they would automatically go to the local authority were a problem to arise.

3.11 The Gypsy Council managed Riverside from the very beginning. It was completed at around the time that the current Flintshire County Council came into existence. It proved impossible in the case study to talk to anyone who had been a party to the discussions, which led to Gypsy Council involvement. It is clear from other case studies that the question of the involvement of the Gypsy Council in site management - especially on an existing site with existing residents used to a different management style - can raise strong feelings among Gypsy-Travellers and other stakeholders. There are often very different perceptions and accounts of events which illustrate some of the problems in achieving a satisfactory balance in site management and enforcement of rules (para 3.60 et seq).

3.12 There is no evidence that site management by the Gypsy Council is automatically better or worse than site management by local authorities in-house. The research suggests that, as with any other form of management, a critical factor is the personality of the actual manager appointed. It is perhaps this that local authorities should take most account of and seek to have a significant say in when considering contracting arrangements.

Sites Managed In-House

3.13 Eight local authorities manage sites in-house (thirteen sites). In all but two authorities, site management is the responsibility of a department/section responsible for social housing. In the remaining areas (Blaenau Gwent and Powys) it is the responsibility of the environmental health or private sector housing sections. The relative importance of housing departments contrasts with the position in England where housing was responsible for managing only a fifth of sites, with a much greater significance for environmental health sections and specialist Gypsy-Traveller units (especially in county councils). The case studies did not reveal reasons for the different location of the management function - it did not appear to have been debated recently (again a contrast to England where some site managers had been transferred between departments on several occasions).

3.14 The Cardiff and Pembrokeshire case studies illustrate the different ways in which site management can be handled by housing departments. The two authorities manage roughly similar numbers of Gypsy-Traveller pitches and residents. In Cardiff, site management is a specialist function with a team of site officers (see below). In Pembrokeshire sites are managed along with council housing by non-specialist staff who have other housing management responsibilities. Site management is a small element of their workload. In addition, site management, like housing management generally, is considerably fragmented with repairs, rent

collection, and estate and tenancy management all being handled by different departments. There is a danger in such a structure of lack of focus on issues specific to Gypsy-Travellers.

Staffing Issues

3.15 There is at least one site warden or site manager responsible on a full or part-time basis for day-to-day site management tasks on twelve of the eighteen sites for which information is available. The exceptions include the five Pembrokeshire sites which, as noted above, are managed in the same way as council housing and Beddau in Rhondda Cynon Taf where the site is not a designated Gypsy-Traveller site; in these authorities, on-site presence is minimal. In Powys a technical officer spends six to eight hours a week on site and a senior officer spends a similar amount of time on management and administration. A single full-time warden/site officer manages on five sites (in Blaenau Gwent, Flintshire, Gwynedd, Merthyr Tydfil and Torfaen). In Carmarthenshire the site officer may be on site up to 37 hours a week, but is also responsible for managing unauthorised encampments. In Swansea the site officer works for the council two days a week and may be on site for four to five hours on each of those days.

3.16 More than one warden/site manager is employed on five sites (in Cardiff, Neath Port Talbot and Wrexham). In Cardiff there are six wardens/site managers for the two sites, in Neath Port Talbot there are three for the two sites. In Wrexham a Gypsy Liaison Officer and two wardens/caretakers are on the Ruthin Road site. All these wardens/site managers are normally on the site either all the time (see below) or for the full working week; none have other non-site-management responsibilities.

3.17 One case study suggests that employing a full-time warden/site manager can be more cost-effective, although apparently more expensive, than more distant management which leads to the need to spend more repairing and/or cleaning up the site.

3.18 It is clear that site management staffing levels vary dramatically across all sites in Wales - from three full-time officers for the nineteen pitch site in Wrexham to a fraction of one person spread over the five sites in Pembrokeshire with 80 pitches¹⁷. Insofar as there is a norm, it is a full-time site officer for one site; this does not necessarily mean 9am to 5pm presence - in one case study area the warden is on site 9am to 1pm and 5pm to 7pm having found these the busiest times. Variations in staffing levels suggest very different interpretations of the management task as well perhaps as some reflections of the real-world difficulties faced.

3.19 The site provision and management survey asked about the main responsibilities of wardens/site managers. This was very incompletely answered. The Carmarthenshire response said *'day-to-day management of the site to include collection of moneys for services, maintenance, liaison with residents, ensure compliance with site conditions'*. This seems to sum up the task although there are differences between areas in the extent to which site managers collect money or actually undertake small repairs rather than referring on to contractors.

¹⁷ It is not possible to make direct comparisons with staffing levels in England because different questions were asked to reduce ambiguity evident in English responses. Overall, including office-based managers as well as site-based officers, the English average staffing level was about 1 full-time-equivalent officer for 16 site pitches. This may not be very different from the Welsh average.

3.20 All the Gypsy Council wardens/site managers are Gypsy-Travellers. None of the local authority in-house wardens/site managers are. Five Gypsy Council managed sites have resident managers - the only exception is one of the Neath Port Talbot sites where the manager lives at the other site. None of the sites managed in-house by local authorities have resident wardens or managers. There were few comments from site residents on these matters. Residents at Riverside seemed to feel protected and supported by the presence of the resident site manager, while a few local authority-managed site residents expressed dislike of the thought of a Gypsy-Traveller manager (felt to be prone to favouritism) or resident management presence (*'someone watches the gate all the time'*).

3.21 This clear distinction in terms of ethnicity and permanent on-site presence suggests that site management is likely to be rather different on Gypsy Council (six sites) and local authority managed sites. There is a further distinction likely between local authority-managed sites with wardens/managers and/or significant on-site presence (seven sites) and those without (six sites). The sample is too small to carry out cross-tabulations but where differences appear very clear, comments below relate differences to this 'management style' variable.

MANAGEMENT POLICIES, PROCEDURES AND ISSUES

3.22 This section looks at various aspects of site management. It starts with a description of site residents, and a general assessment of perceived management performance. It then deals with licence agreements and site rules; waiting lists and pitch allocations; licence fees and other charges; repairs; site services; relations between management and residents; and liaison with other service providers.

Site Residents

3.23 As noted in Chapter 2, sites vary greatly in size, age and condition. They also vary in terms of the characteristics of their residents, potentially affecting the management task.

3.24 Site provision and management survey respondents were able to give an indication of the ethnicity of site residents¹⁸ on seventeen sites. Nine sites are occupied by Welsh Gypsy-Travellers only (Blaenau Gwent Cwmcrachen; Carmarthenshire Penybryn; Neath Port Talbot Ceagarw and Briton Ferry; Pembrokeshire Catshole Quarry, Kingsmoor, Withybush and Under the Hills; and Torfaen Shepherd's Hill) and one (Powys Withy Beds) accommodates English Gypsy-Travellers only. Two sites (Swansea Tygwyn and Wrexham Ruthin Road) are occupied by Irish Travellers only. Three sites are occupied by both Welsh Gypsies and Irish Travellers (Cardiff Rover Way and Shirenewton; Pembrokeshire Waterloo). Flintshire Riverside is occupied by English Gypsy-Travellers and Irish Travellers, and Gwynedd Llandygai is occupied by Welsh and English Gypsy-Travellers and Irish Travellers. Thus Irish Travellers live on seven of the nineteen sites.

3.25 Respondents were able to give details of the number of children and adults living on eight sites only. The range was from three adults on the three pitches at Rhondda Cynon Taf Beddau caravan site to 301 people (180 adults and 121 children) on the 56 pitch Shirenewton site in Cardiff. Because the sample number is so small, it is not worth carrying out any sophisticated analyses. Two points can be made:

¹⁸ The categorisation was provided by survey respondents and may not reflect site residents' self identification.

- The number of people per occupied pitch is high on most sites where information is available. Across the eight sites the average persons per plot is 4.5. This compares with an English site average of 3.2 persons suggesting significantly larger household sizes in Wales (or more extended families on pitches).
- The percentage of the site population who are children up to age 16 is more than 40% on six of the seven sites for which information is available, and over 50% on three (ie there are more children than adults on Rover Way in Cardiff, Riverside in Flintshire and Tygwyn in Swansea). This again is higher than the English proportions.

3.26 Other things being equal, large families and large numbers of children suggest the potential for rapid formation of new households in future. The survey asked how many pitches on sites include 'doubled up' households who would ideally like a separate pitch or house of their own. Answers were given for fourteen sites (one further answer was given but does not seem credible so it seems the question was misunderstood). There were said to be no doubled up households on seven sites, one on three sites, two on three sites and twelve on one site (Cardiff Shirenewton). This gives a total of 21 additional households ideally looking for separate accommodation, but may be an under-estimate. For example, the Gypsy Liaison Officer in Cardiff estimates that there may be as many as 50% more households than pitches on Shirenewton which is greater than the twelve 'doubled up' households reported above (see also references to pitch occupancy in 2.117).

3.27 Most respondents were able to provide information on the proportion of site resident households which include someone who works. Sites appear to fall into two groups:

- Those where most households include someone who works (Blaenau Gwent Cwmcrachen, all the Pembrokeshire sites and Swansea Tygwyn).
- Those where a minority of households include someone who works (both Cardiff sites, Flintshire Riverside, Powys Withy Beds, Rhondda Cynon Taf Beddau and Wrexham Ruthin Road).

3.28 Information was provided for eleven sites on the proportion of site residents who have special health needs. On six of the eleven sites less than 10% of residents have such needs. The five sites where there are said to be more than 10% of residents with special health needs are Flintshire Riverside, Rhondda Cynon Taf Beddau, Torfaen Shepherd's Hill, Swansea Tygwyn and Wrexham Ruthin Road.

Gypsy-Traveller Comments - Site Communities

3.29 It is apparent from the interviews with Gypsy-Travellers in the case study areas that several sites are occupied by members of a single family or members of a few families only. On one site in Pembrokeshire, an interviewee commented: *'We can look after ourselves. Everybody is related and we get on and know the local people in Pembroke'*. On one site with transit as well as residential pitches, an interviewee on a transit pitch recognised family matters in a slightly different way by saying that he was not related to any families on the main residential site. The only family he likes to be with are his brothers and sisters, and if his children go onto the main residential site, he brings them back.

3.30 Whether or not residents are all related, it is clear that some sites function much better socially than others. Extreme comments (relating to different sites) illustrate this:

'Everyone knows each other - if you go away they looks out.'

'This site is corrupt. It's just dog eat dog.'

'The comfort I find here is if I need to rush off anywhere . . . can get people to pick my kids up, feed 'em, let 'em play out . . . We all watch each other's kids.'

3.31 On most sites there appears to be a supportive community which is greatly prized. There was often a comment to the effect that this would not happen in bricks and mortar housing.

Site Management Performance

3.32 The site provision and management survey asked respondents to make general assessments of their management performance and also sought to gather more specific information from which an 'objective' judgement might be made.

Local Authority Assessments of Site Management Performance

3.33 Table 3.2 shows the assessments respondents made for their sites on various indicators of site management or problems. Answers relate to eighteen sites.

Table 3.2: Assessments of Sites on Various Management Issues and Problems

	Very good	Fairly good	Neither good/poor	Fairly poor	Very poor
Residents' care of pitches	-	12	3	3	-
Level of vandalism and damage	2	6	5	3	2
Fly-tipping on and around site	2	3	8	1	4
Relations between site residents and managers	5	4	7	-	1
Relations between site residents and settled neighbours	3	5	4	5	-

Source: Site provision and management survey

3.34 As can be seen, assessments cover the full range. The most favourable assessments are relations between site residents and site managers, relations between site residents and settled neighbours and residents' care of their pitches. Fly-tipping and levels of vandalism and damage score less well although there are sites judged very good on each. Relations between site residents and site managers are judged more positively on sites managed by the Gypsy Council and by local authorities in-house with a site warden or manager.

3.35 These assessments are obviously subjective and depend on respondents' expectations and standards of judgement. Undue weight should not, therefore, be placed on any ranking of sites on this measure. The three sites with the highest assessments are Blaenau Gwent Cwmcrachen, Cardiff Shirenewton and Flintshire Riverside. The three sites with the lowest self-assessments are Pembrokeshire Catshole Quarry and Waterloo, and Swansea Tygwyn.

Assessments are lower on average on sites where there are any vacant or closed pitches than on sites where there are none, and are lower where the site is managed in-house by a local authority but without a specific site warden or manager.

3.36 Respondents were asked about the main management problems experienced on their sites. Few respondents identified any specific problems. Problems with rubbish dumping on surrounding land was identified at three sites in Pembrokeshire. At two of these some squatting was also identified on vacant/closed pitches. Lorry parking and straying dogs were identified in Cardiff Shirenewton and general 'bad behaviour' at Rhondda Cynon Taf Beddau. Lack of co-operation on the part of some residents was noted at Carmarthenshire Penybryn. Undertaking maintenance inspections without being intrusive, and unrealistic resident expectations about speed of repairs were identified in Powys Withy Beds. It is unlikely that this is a comprehensive picture of management problems.

3.37 A different perspective on management problems comes from stakeholder interviews and Project Advisory Group discussions, and from Gypsy-Traveller site residents. Problems from the stakeholder/Advisory Group perspective include lesser security of tenure on Gypsy-Traveller sites and issues around pitch allocations. As will be seen, Gypsy-Traveller interviewees were, on some sites, particularly concerned over repair services and charging for electricity.

Management Statistics

3.38 Respondents were not able to provide basic management statistics for all sites. The sample size on most measures is sixteen sites (Neath Port Talbot sites were treated together rather than separately).

- Pitches becoming vacant 2004/5: no pitch became vacant during the year on seven sites; one pitch became vacant on two sites (Pembrokeshire Catshole Quarry and Swansea Tygwyn), two on three sites (Cardiff Rover Way and Shirenewton, and Powys Withy Beds), three on one site (Blaenau Gwent Cwmcrachen - all transit pitches) and five on one site (Wrexham Ruthin Road). Nine pitches became available on the two sites in Neath Port Talbot. Thus 25 pitches became vacant in the year across the sixteen sites which together have 319 pitches. Turnover was thus almost 8% overall, but concentrated on few sites; at least three of the pitches coming vacant were transit pitches (there are transit pitches on one of the Neath Port Talbot sites and transit pitch vacancies were not distinguished).
- Number of new licences granted 2004/5: figures provided here match those for pitches coming vacant except on Wrexham Ruthin Road where only three new licences were granted, implying that two pitches were vacated and remained unlet.
- Two possession actions were commenced 2004/5, both on sites in Neath Port Talbot.
- Three evictions took place during the year, two at Neath Port Talbot sites and one at Pembrokeshire's Waterloo site.
- Pitches were relet during 2004/5 on nine sites. On five of these the average time taken to relet was less than a week. On two it was two weeks, and on one it was about two months. On the other site, the pitch had been empty for over a year prior to being let.

- Information on arrears of licence fees at 31/3/2005 was provided for nine sites only. On six of these there was said to be no outstanding arrears. On one a sum of £60 was noted, on another £1,845, and on the third £2,870 (one licensee only). The impression given is that arrears are not a significant problem although partial information makes it hard to be sure. Most residents receive full housing benefit (HB) which reduces the scope for arrears unless there are problems of HB over-payments.

3.39 Respondents were asked to summarise site occupancy during the year 2004/5. It was said to be 100% for most of the year on thirteen sites (in one case 100% of pitches in the area identified for site consolidation). It was said to be less than 100% for most of the year at Carmarthenshire Penybryn, Pembrokeshire Catshole Quarry and Waterloo and Wrexham Ruthin Road. Comparison with figures on pitch occupancy reported in 2.18 above shows that authorities are not including closed pitches in their summaries of site occupancy here, reflecting the effective current size of sites.

3.40 All or almost all residents were said to have lived on site for three years or longer on the majority of sites. The exceptions are those identified above as having less than 100% occupancy during the year, and Swansea Tygwyn where occupancy was almost 100% but a minority were long-term residents. These statistics suggest issues of low site occupancy on a minority of sites. However, most relet rates are good, and rent arrears apparently low.

Licence Agreement and Site Rules

3.41 Residents on local authority Gypsy-Traveller sites are licensees rather than tenants and as such have fewer statutory rights than secure council tenants. Some important differences are:

- Site residents' rights and responsibilities are determined by their licence agreement. There is no guidance as to what should be included, and no 'model' agreement. Licence agreements are often couched in quasi-legalistic language and tend to emphasise resident obligations rather than resident rights or landlord obligations.
- Licensees do not have the statutory rights enjoyed by secure tenants, for example the right to consultation, or the right to buy. Spouses and other close family members who live with a secure tenant have the right to succeed to the tenancy on the tenant's death. There is no such statutory right for licensees.
- Licensees on local authority residential Gypsy-Traveller sites have minimal security of tenure. They do not enjoy security rights as 'tenants' and are explicitly excluded from protection under the Mobile Homes Act 1983. The Housing Act 2004 (s209) ensures that all site licensees have basic protection from eviction without 28 days notice and a court order for possession, and gives the court discretion to suspend a possession order for up to twelve months. No reasons have to be given to terminate a licence. However a recent case¹⁹ reaching the European Court of Human Rights established that the lack of procedural safeguards, because the Gypsy-Traveller involved could not make representations on factual issues in court, meant that eviction in such circumstances was a breach of Article 8 of the European Convention on Human Rights (right to respect for family life and home).

¹⁹ Connors v United Kingdom (2004) 40 EHRR 189

- Licensees have other, general, rights and safeguards. For example, consumer protection legislation may give licensees redress under the *Unfair Terms in Consumer Contracts Regulations 1999* if terms in their licence agreement can be construed as unfair²⁰. It is likely that a court would imply landlord repair obligations into a licence agreement even if these were not specified²¹. The Environmental Protection Act 1990 s82 (statutory nuisance) applies on sites and could provide basic protection against very poor conditions.

3.42 The lesser rights of Gypsy-Traveller site licensees compared with either secure council tenants or mobile home owners is a matter of national concern. The Gypsy and Traveller Law Reform Coalition has drafted the Caravan Sites Security of Tenure (and Related Clauses) Bill which seeks to address a number of issues including security of tenure, succession, assignment, right to exchange and repairs.

3.43 Because site residents' rights and responsibilities are currently determined by their licence agreement the site provision and management survey explored licence agreement terms, focusing particularly on those which might impact on lifestyles.

3.44 There are sometimes restrictions on the number of caravans/trailers which can be placed on a pitch. There are also sometimes rules on whether mobile homes or sheds/chalets are permitted. This may be because of the size of the pitch in order to prevent over-crowding, but it can also be to avoid the growth of relatively 'fixed' accommodation on site. Table 3.3 shows the survey findings on this.

Table 3.3: Mobile Homes, Sheds and Additional Caravans

	Permitted	Permitted with written approval	Not permitted
A mobile home	12	3	4
Shed or chalet	3	8	8
More than one caravan/trailer	8	8	3

Source: Site provision and management survey

3.45 Residents are permitted to have more than one caravan or trailer on most sites, although written approval should often be sought. A mobile home is allowed on more than three-quarters of sites; again some sites require written approval. A shed or chalet is not allowed on two-fifths of sites, and on very few without written approval. There are no observable differences by management style. Sheds or chalets are less likely to be permitted in Wales than in England (allowed on 87% of sites in England). It is not clear why this should be.

3.46 Site licences/rules often restrict the number or type of animals which can be kept on site. The rationale is lack of appropriate accommodation and space, preventing nuisance and encouraging site cleanliness - for example poultry are said sometimes to encourage rats. Uncontrolled dogs can cause a nuisance and may deter postal deliveries and so on. Table 3.4 shows the survey findings.

²⁰ See Office of Fair Trading, Unfair contract terms guidance, February 2001, <http://www.oft.gov.uk/business/legal/utcc/guidance.htm>

²¹ See *Berry v Wrexham CBC* August 2001, Legal Action 25

3.47 Dogs and other domestic pets are allowed on most sites - indeed a case study suggests that, in practice, dogs are permitted even on the single site where written rules say they are not allowed. Permission to keep poultry, horses and goats is the exception rather than the rule and is restricted to sites in Cardiff and Torfaen. There is no apparent relationship with management style.

Table 3.4: Animals Permitted on Site

Animal	Permitted	Permitted with individual approval	Not permitted
Dogs	15	3	1
Other domestic pets	13	4	2
Poultry	3	-	16
Horses	1	2	16
Goats	2	-	17

Source: Site provision and management survey

3.48 A factor often referred to in discussions of Gypsy-Traveller lifestyle is the close relationship between work and residence. This has appeared in planning guidance and is one reason why Gypsy-Traveller sites are treated differently from 'normal' residential developments. Rover Way in Cardiff is unusual in having combined residential and commercial use planning permission. The survey asked whether work is permitted on site and, regardless of permission, what sort of work, if any, is actually carried out on site.

3.49 Sites were fairly evenly split between those where work is permitted subject to negotiation (slightly more common) and those where work is not permitted. On no site is work permitted without restrictions. This is an area where management style has an impact since work is not permitted on any site managed by the Gypsy Council, but is permitted subject to negotiation on ten out of thirteen sites managed by local authorities in-house.

3.50 Some residents actually carry out some form of work on thirteen of the nineteen sites (on two out of six managed by the Gypsy Council and on ten out of thirteen sites managed in-house). The most common forms of work are:

Scrap sorting/dealing	11 sites
Storing work related equipment	8 sites
Tree work: storing/disposing loppings etc	7 sites
Storing furniture/carpets etc	5 sites
Cable/tyre burning	3 sites

3.51 The only form of work identified on sites managed by the Gypsy Council is tree work - perhaps less disruptive for other residents than scrap storing/dealing and certainly less troublesome than cable or tyre burning. The space provided for work and storage related to work was said to be adequate on three sites only; it was said to be inadequate on nine sites.

3.52 As noted above, security of tenure is one area where licensees are at a disadvantage relative to secure tenants. Twenty eight days was given as the period of notice required for the landlord to terminate the licence agreement on seventeen out of nineteen sites. The remaining two sites are Carmarthenshire Penybryn (notice unspecified but said to be less than 28 days)

and Torfaen Shepherd's Hill (notice 21 days); notice periods of less than 28 days are unlawful given the Housing Act 2004 provisions. There are no plans to enhance the security of tenure given to site licensees to bring them closer in line with secure tenants or other mobile home residents as has been done occasionally in England²².

3.53 Very few licences give licensees rights which are enjoyed by secure tenants or residential caravan dwellers protected by the Mobile Homes Act 1983. Respondents said licensees had:

A right to be consulted on management issues	4 sites
A written right to repairs	3 sites
A right to exchange pitches	2 site
A right to assign the agreement	No sites

3.54 The reported position on succession of the agreement to members of the licensee's immediate family is:

Succession allowed in the licence	4 sites
Succession normally allowed in practice	9 sites
Succession not normally allowed in practice	3 sites
Issue never arisen	3 sites

3.55 No site residents have the right to buy their pitch.

3.56 Gypsy-Travellers on residential sites may wish to travel for a period in the year while retaining their pitch. A period of absence while travelling is permitted on all but two sites (Gwynedd Llandygai and Rhondda Cynon Taf Beddau which is not a designated Gypsy-Traveller site). The length of absence permitted is:

4 weeks	7 sites
13 weeks	4 sites
6 weeks	1 site
8 weeks	1 site
15 weeks	1 site
No fixed period	3 sites

3.57 In the case of Pembrokeshire (five sites) a period of four weeks is permitted without notifying the landlord; a longer period may be permitted by negotiation. Full rent must be paid during absence on all save one site (Flintshire Riverside). On this site, an empty pitch may be let for short-term use while a resident is away - an arrangement said to cause no problems while providing some transit accommodation.

3.58 Licensees are not permitted to have visitors with caravans/trailers to stay on site on around a fifth of sites. Restrictions are imposed to safeguard site safety and separation distances between caravans, and to avoid additional (semi-)permanent site residents becoming established. This is an area where management style has an impact in that visitors are not permitted on half of sites managed by the Gypsy Council but are permitted on eleven out of twelve sites managed in-house. In all instances, there are some restrictions on visitors. On seven sites the stay must be short (up to a week) and/or related to family circumstances such as a funeral, wedding or illness. Visitors are permitted on the Cardiff sites for periods of up to six weeks in any year; after six weeks they are classed as non-dependents for site

²² For example, Oxfordshire County Council has recently introduced revised licence agreements giving licensees similar security to secure tenants.

management and Social Security/housing benefit purposes. This is seen as an attempted deterrent to family members permanently joining others on site. At Wrexham Ruthin Road licensees should seek written permission in advance in order to make adequate arrangements for their visitors' stay on site; in some instances it may be possible to offer the use of vacant pitches for temporary stays. At Powys Withy Beds, visitors' caravans must be located in communal areas.

Case Studies

3.59 Discussion in case study stakeholder interviews tended to focus on issues around the enforcement of licence agreements and rules rather than the detail of those rules. However, it was clear that in some places there is a difference between legal agreements and site rules as written, and 'rules' as understood and enforced day-to-day. For example, in one instance the 'rules' were said to boil down to *'pay the rent and don't harass the neighbours'*. In another they were essentially to send children to school; to look after dogs and control children; not to argue over children; and not to play loud music at night.

3.60 How rules are enforced goes to the heart of management style. In one area without on-site presence, sites are effectively managed day-to-day by their residents who presumably enforce any community 'rules' on behaviour. Elsewhere enforcement is the responsibility of the site warden or manager. These officers have evolved their own ways of working - as one commented, it is the sort of job for which there is no manual, *'you can either do it or you can't. You have to use your head'*. One site manager commented that enforcement of rules (for example no motor bikes to be driven around the site causing noise nuisance) is very difficult. Two factors emerged from the interviews:

- If a manager tries to tackle someone about something, he might be told that others were breaking the rules, so why pick on them.
- Gypsy-Traveller residents will very rarely inform site managers or anyone else about the behaviour of fellow Gypsy-Travellers even if they resent the nuisance being caused. Such non-involvement can be very frustrating for a manager.

Neither point is, of course, unique to Gypsy-Traveller sites but are common in the management of bricks and mortar housing too.

3.61 Good site managers seem to succeed in large part through their personality²³, and through developing mutual respect and trust with residents. Words commonly used are 'fair' and 'firm'; consistency is also important and doing what you say you will do. This means that the site manager must him/herself be able to deliver and must have authority to act and should be supported by senior officers if s/he is not to lose credibility in the eyes of residents. The aim, by one means or another, is to create a situation where residents will ask first before doing something and then abide by the answer. The end product of such an approach - the measure of success - is a site where everyone gets on and wants to stay, one where *'there is peace and harmony and rules people stick to'*. 'Good' sites are reasonably tidy, but not regimented. In one instance the importance of the site manager was illustrated by the way standards slipped while he was off sick for a period and residents started dumping and so on.

23 This presents some challenges in recruitment for site wardens/managers. Succession planning for long-serving successful wardens/managers is also important.

3.62 There has to be some relationship between resident consent and management style. A relatively strict manager might be resented by residents on a site where things have previously been more relaxed, but very well liked on a site where this is the known and accepted norm, and may even be the reasons some come to the site. For example, in the area without on-site presence, an officer commented that residents *'don't like to be bothered'*, and feel he is snooping if he visits. Elsewhere the presence of on-site wardens is appreciated and felt to provide some protection and support.

3.63 These points suggest that site management and enforcement of rules is a question of balance, and often something which develops over the years.

Gypsy-Traveller Views

3.64 Some Gypsy-Traveller interviewees said that they had written licence agreements and some said that they had not. This variation was not just between residents on different sites, but also between residents on the same site. Whether or not they had a written agreement, those on residential pitches were confident that they had the pitch for as long as they wanted it. While interviewees might not know what legal security they have and what grounds a landlord would have to evict them, there was no impression of disquiet. People felt secure. Many had no experience of a licensee being asked to leave or, if they had, seemed implicitly to think that it had been deserved.

3.65 Many interviewees were also fairly clear of the rules they had to follow. Some were simple like keeping the kids under control and the plot clean. Others were more complex such as: caravans have to be 20 feet apart, only one dog and one cat is allowed, the electric cables have to be of a certain thickness and residents are only allowed to leave their pitch for three weeks without letting the council know. None of the interviewees appeared unduly irked by the rules as they understood them:

'There's nothing we'd like to do we shouldn't, but we leave the council alone - and they leave us alone.'

The *'they don't bother us and we don't bother them'* theme was expressed on other sites too as a desirable state of affairs.

3.66 Among residents interviewed, opinions seemed to be in favour of fairly strict enforcement of rules. People living on sites with firm management seemed to like it, and some of those on sites where management was seen as less firm would prefer it to be firmer. The following quotations illustrate this.

'If this site was badly run, no-one would want to pull on it would they? . . . You want to be in place where you know you're secure and you know naught can happen to your homes and you're safe. . . You need someone there all the time to make sure you're secure.'

J would stay on the site if it was done up and the warden didn't take sides with different factions. There are lots of things that you can't do according to the licence but they are not enforced. J feels she has no control on this site beyond her own plot. She says there are lots of dogs and mess on the site and the rules are not kept. She thinks the management could be stricter. [Paraphrased]

Waiting Lists and Pitch Allocations

3.67 As with permanent housing, site waiting lists are one indication of need/demand for accommodation. On eleven sites (58%) there are either no waiting list or no-one recorded on the list. This is a very different situation from that found in England where only a quarter of sites either had no list or no-one registered on it. The Welsh sites with a list are:

Flintshire Riverside	80 applicants
Torfaen Shepherd's Hill	20 applicants
Cardiff Shirenewton	16 applicants
Blaenau Gwent Cwmcrachen	6 applicants
Cardiff Rover Way	5 applicants
Pembrokeshire Kingsmoor	3 applicants
Rhondda Cynon Taf Beddau	2 applicants
Powys Withy Beds	1 applicant

3.68 The great differences revealed are quite hard to interpret. The Riverside long 'list' appears to be a reflection of interest shown rather than a formal bureaucratic queue. However, the 'lists' do seem also to reflect relative attractiveness of the site and demand for places. In some instances it might be argued that lack of pitch vacancies discourages families from applying (said in Cardiff, especially in relation to Shirenewton). Bearing in mind these caveats, the general conclusion to be drawn is that demand for sites is very variable across Wales. This is evident both by these waiting list figures and the vacant pitch figures presented earlier. There are some sites with a waiting list, and some sites with vacant pitches due to lack of demand.

3.69 The case studies illustrate two points about demand:

- Welsh local authorities are generally large in area and may include quite diverse communities. A site in one area cannot be seen as meeting need/demand in another part of that area. For example, a Gypsy-Traveller was interviewed on a private site in Carmarthenshire. He had been seeking a site around Carmarthen for many years. For him the Carmarthenshire site at Bynea near Llanelli was irrelevant. The same factor arises in Pembrokeshire where vacant places on Under the Hill in Haverfordwest cannot be seen as relief for the over-subscribed site at Kingsmoor Common near Tenby.
- Geographical differences are sometimes reinforced by family differences between sites. A number of case study sites are occupied by one or two extended families only. Members of other local families or unrelated people may not want to settle on such a site and might not be welcome.

Obviously these points complicate any needs exercise - a paper match of pitches and families may look quite different on the ground and with real people.

3.70 The English research found that pitch allocation policies are often informal. Lack of formal policies leads to lack of transparency and to complaints, and leaves a manager open to challenge over fairness. The site provision and management survey asked about the most important factors taken into account when allocating pitches; answers were given for seventeen sites. They are:

Need for accommodation	14 sites
Local residence/local connection	13 sites
Time on waiting list	12 sites
Medical/special health needs	9 sites
Previous rent arrears	8 sites
Family size/composition	7 sites
Family or personal compatibility	7 sites
Previous known behaviour/references	4 sites
Ability to pay	No site

3.71 There are distinct differences in the relative importance of factors between sites managed by the Gypsy Council and by authorities in-house. Very broadly, authorities managing in-house give greater priority to local connection, family size and composition, and need for accommodation. On the Gypsy Council managed sites greater priority is given to family or personal compatibility and previous known behaviour. Roughly similar weight is given by both types of manager to medical needs, previous rent arrears and time on the list.

3.72 Overall, family or personal compatibility ranks much lower as a factor to be taken into account in Wales than in England where it proved to be the single most important factor. This may be a consequence of the greater involvement of housing departments in site management in Wales and the application of 'mainstream' allocation rules. However, the case studies suggest that the figures above may understate the importance of compatibility in practice if not in policy (see below).

3.73 A further question in the survey asked whether a pitch would normally be offered to applicants in specified circumstances. The figures below relate to the number of sites where such an applicant might be given an offer; answers were given for seventeen sites.

Someone wanting to move from a site pitch elsewhere	14 sites
Someone wanting to move from a house/flat	12 sites
A single person without children	12 sites
Someone with outstanding rent arrears	4 sites

Again there are some differences apparent between in-house and Gypsy Council managed sites. The Gypsy Council is relatively less likely to make offers to people from houses or flats or to single people without children, but much more likely to make an offer to someone with outstanding rent arrears.

3.74 On almost all sites an applicant is contacted in advance and/or interviewed before being offered a pitch. Applicants are contacted in advance on thirteen out of seventeen sites, while they are interviewed on eleven. References are taken up only on four sites. There are no marked differences in this respect between Gypsy Council and in-house managed sites. A comment on one completed questionnaire illustrates the somewhat abstract nature of the questions in circumstances of low demand, noting that in practice Gypsy-Travellers tended to move onto the site and the manager then completed the paper work rather than actively 'allocating' the pitch and vetting the applicant. The case studies suggest that this can happen in several areas where there is little competition for pitches and even in some places where there is.

Allocations in Case Study Sites

3.75 The case study areas covered a spectrum from formal to informal allocation policies and practices. Among other things, the differing practices illustrate how family compatibility is treated.

3.76 At one extreme, Cardiff applies normal housing waiting list rules and pitches are allocated according to points scores. In the system points are awarded for various measures of need, but also increase with time spent on the list. The maximum points that can be awarded initially is 53, but allocations are made at 150-200 points, requiring a wait of four to five years for any offer. Young couples thus face a considerable wait for any offer and, because so few vacancies arise, an offer of a pitch might take even longer. Allocation selections for pitches are made by Housing and sent to the Site Manager for comment and passing. The Site Manager is not allowed to take family/ethnic factors into consideration although these may determine where on the site the family is allocated.

3.77 At the other end of the spectrum, allocations made by the Gypsy Council site manager at Riverside in Flintshire are much less formal. When someone expresses an interest in moving to the site, the manager will invite residents *'for a social chat over a bottle or two'* in the office. In the course of general conversation he will mention the would-be applicant and note reactions. If someone advises that there would be problems with the applicant no further action is taken. If someone knows the applicant and thinks they are OK, their name will be put on the list. When a rare pitch vacancy occurs, it is allocated to the first approved applicant who turns up or rings up for it. Information about up-coming pitch vacancies is likely to pass through family networks, reinforcing likely compatibility between the newcomer and existing residents. The manager is aware of the dangers of a single family becoming dominant and taking control of the site, and guards against this in allocations.

3.78 There is no formal allocation policy or priority scheme for pitches at Cwmcrachen in Blaenau Gwent. There is a list for residential pitches, but there has not been a pitch to allocate for years. A few transit pitches have been allocated, normally to people who turn up at the right time and ask for one. Known trouble makers would be refused. Were a residential pitch to come available, it might well be allocated to someone from the transit pitches who has shown him/herself to be a good tenant.

3.79 In Pembrokeshire there is a real waiting list for one site only. On other sites, allocations are likely to go to anyone expressing an interest or people who have moved on as a squatter in advance of a formal allocation. On the site with unmet demand a prime unwritten consideration is not to upset the families already living there. This means that pitches are allocated in practice to relations or at least to compatible families. Applications for site places must be treated bureaucratically in the same way as for council houses, with a form completed and pointed. In this case however, points levels may in practice be secondary and the administrative processes are sometimes completed retrospectively.

3.80 These cases show that pitch allocation processes often fall short of the ideal of transparency and objectivity thought to be desirable in the allocation of social housing. The managers involved would probably argue that Gypsy-Traveller sites are different and that different criteria should be applied. Cardiff, especially at Shirenewton, shows that formal policies can be applied while maintaining a successful, well-run site. However, site

design helps there with the cul-de-sac enclaves geared to creating communities within the wider 'community'. Staffing levels are also relatively high²⁴. I am tempted to conclude that not allowing family compatibility an important place in allocation priorities is tenable only if site design aids this and management staffing levels are sufficient. Sites with 'compatible' residents are more likely to have an element of self-management and require less formal management input. Where there is a mixed Gypsy-Traveller population, a likely consequence of seeking compatibility among site residents is the need for more than one site to accommodate 'outsiders'.

Gypsy-Traveller Comments

3.81 Gypsy-Traveller interviewees did not talk much about allocation policies in the abstract, but did talk about how they themselves came to the site. Some had lived on their site for many years, sometimes since before the formal site was built. A few had always lived there: *'this site is home, I was born and reared here'*. Others had stories which illustrated different aspects of the allocation process:

- The importance of family links in providing information about the site and vacancies is shown in a couple of examples. One woman had a third cousin living on her site who told her when an empty pitch was coming up; she was living with her parents on a site in Preston. Another had visited the site on family holidays with her husband's family who lived there. The children loved the site, she liked the company and decided to move from a house in London.
- One woman had simply moved onto an empty pitch on a site. The pitch was in an awful mess and because she cleaned it up she was allowed to stay.
- One young couple had involved a solicitor in getting a pitch. They had had their name down for five or six years. They requested a particular vacant pitch and involved the solicitor when it was refused. At this point his mother's pitch was made bigger to accommodate the young couple. Shortly before the interview, the couple had been formally given the mother's pitch when she went into a house. They think that the allocations system is not fair because Gypsy-Travellers born on the site are not given priority. (Site managers point out that very few pitch vacancies arise compared to demand on this site.)

3.82 A few comments were made by interviewees which relate to the question of 'mixed' sites versus those accommodating consciously compatible families. Paragraph 3.30 et seq above noted favourable comments made about sites where residents were inter-related and knew everybody. Comments about 'mixed' sites tended to be adverse - of the *'you get all sorts there'* kind. It would seem that many residents would naturally favour the type of allocation policies which consider who the applicant is as well as or more than what their needs are. Site residents have, by definition, been successful in the allocation process.

Licence Fees and Other Charges

3.83 The site provision and management survey asked authorities to give licence fees/rents for their sites. Weekly residential licence fees charged range from £5.95 (Rhondda Cynon Taf

24 Ruthin Road in Wrexham is also a 'mixed' site where family compatibility is not paramount. Again there are high staffing levels. Some 'community development' work has been undertaken on this site to prepare the way for allocations to 'outsider' families from unauthorised encampments.

Beddau, not a designated Gypsy-Traveller site which has minimal facilities) to £74.58 (Blaenau Gwent Cwmcrachen)²⁵. The mean licence fee is £40.59 and the median £32.15. These licence fees are significantly lower than those found in England back in 2002 where the mean was £44.82 for a double pitch and the median £41.00. Only 7% of double licence fees in England were up to £30 compared with over two-fifths in Wales.

3.84 There are differences between licence fees charged according to management style. The average fee on sites managed by the Gypsy Council is £46.88 (range £42.50 to £50). The average on sites managed in-house is £38.66, but this conceals a difference between those managed without a site warden or manager (mean £25.78) and those with a site warden/manager (mean £49.69). Thus there appears to be some relationship between licence fee and service provided. There also appears to be a relationship between site condition and licence fee since the average fee on the six sites requiring an expenditure of less than £1,000 per pitch per annum over the next five years (see Chapter 2) is £48.70 compared with £31.81 on the six sites requiring an expenditure over £2,000. This relationship can, of course be seen in different ways - higher fees provide income which helps keep standards up, or higher standards justify higher licence fees.

3.85 A survey question asked how licence fees are set. Answers provided little useful information - for example: *'by the Gypsy Council'* or *'set within Housing Services'*. Powys said that licence fees are set in consultation with the Welsh Assembly Government Rent Officer Service. The case studies also failed to shed much light on licence fee fixing although in one instance fees were explicitly set to cover costs. There may be a tendency to increase fees in a similar manner to council rents on council sites, but fixing the absolute level seems to be much more obscure.

3.86 No additional charge was levied as a standard cost on seven sites (almost two-fifths of those providing responses). Additional charges levied were as follows:

- A damage deposit at the start of the licence on four sites (£20 at Rhondda Cynon Taf Beddau, £120 at Neath Port Talbot's two sites and £200 at Carmarthenshire Penybryn). This is a lower proportion of sites than found in England where a damage deposit was taken on 44% of sites.
- Water and/or sewerage charges on seven sites (£5.15 on all Pembrokeshire's sites, £12 on Wrexham Ruthin Road and an unknown amount on Torfaen Shepherd's Hill) - these are standard charges not related to usage. This is in line with the English experience. Such charges, when levied separately are not eligible for housing benefit.

3.87 Respondents were asked how licence fees were collected. Fees are paid by housing benefit direct on all sites, and sometimes this accounts for all fees payable. Other methods used are:

At council cash office	9 sites
At post office	7 sites
Direct debit/standing order	5 sites
Door to door collection	3 sites
To site office/site manager	2 sites

25 A single licence fee amount has been included for each site; it may sometimes relate to a single and sometimes to a double pitch. Licence fees only appear to vary according to pitch size on Shepherd's Hill Torfaen.

3.88 There are differences here with the English experience where door to door collection and payment to the site office/site manager were the main methods for collecting any payments not met directly by housing benefit. This probably links directly with the greater incidence of site management by housing sections in Wales. Authorities managing sites in-house use the same methods for collecting licence fees and rent from council tenants. This produces another difference between sites managed in-house and those managed by the Gypsy Council where door-to-door collection and payment to the site office/site manager are commonly used.

3.89 Most site residents are getting housing benefit towards their licence fee payments. On almost three-quarters of sites, this was said to be all or almost all residents, and on just over a quarter it was most (defined as between 60% and 90%). The case studies show that site managers see helping residents to get housing benefit as part of their role. Several regularly help residents to complete application forms and liaise on their behalf with housing benefit offices. Maximising income from housing benefit helps both residents and site managers.

3.90 A number of Gypsy-Travellers interviewed were making some rent payments either because they were working or had non-dependant deductions taken from housing benefit payments. Several were highly appreciative of the site warden or manager's help in claiming benefit, others had engaged the help of other agencies in completing the application forms. One resident specifically commented that he would sort out any issues himself as he would not want *'the warden knowing my business'*.

3.91 On twelve sites, none, almost none or a minority of licensees were said to be in arrears with licence fees or other regular charges. On five sites all or almost all were said to be in arrears, and on one site most were said to be in arrears. This is on the Pembrokeshire sites and Wrexham Ruthin Road where, as shown above, additional charges are made for water/sewerage which are not eligible for housing benefit. This illustrates the problems of collecting such additional payments from residents.

3.92 Respondents for two-thirds of sites said that they had written procedures for recovering arrears. These are all sites managed in-house by local authorities, presumably applying standard recovery policies. None of the sites managed by the Gypsy Council have written procedures for recovering arrears of licence fees or other regular charges.

Repairs

3.93 Site managers are responsible for repairs to site facilities and infrastructure, and pitch surfaces and amenity units. The survey shows that the most common way for residents to report necessary repairs (on over four-fifths of sites) is to an officer or warden while on site. This method extends across all management styles. On sites managed by authorities in-house, site residents can also report repairs by visiting council offices (eight sites). Repairs can be reported by telephone on the sites managed by authorities without a site warden or site manager.

3.94 There are regular inspections to identify the need for repairs on twelve out of eighteen sites. On eleven of these sites the inspection is carried out by the site warden or site manager, usually daily but on three sites at least weekly and on one monthly. At Ruthin Road Wrexham the Area Repairs Manager makes regular visits to the site. In Torfaen the Gypsy Council site warden inspects the site daily and environmental officers from the council inspect annually. There are no examples of site inspections being carried out by senior council officers, elected members or site residents on a formal basis.

3.95 Response time targets for repairs to be completed are said to be set on all but four sites (Blaenau Gwent Cwmcrachen, Carmarthenshire Penybryn, Gwynedd Llandygai and Torfaen Shepherd's Hill). Some of these response targets may be relatively informal, and of the 'as soon as possible' type. Responses can be rapid even where targets are not set. The site manager at Cwmcrachen will undertake simple tasks himself. For more difficult tasks he notifies the Council's direct labour organisation who are reported normally to carry out the work on the same day. The manager commented that site repairs have to be done quickly, or the site will start to deteriorate rapidly.

3.96 Repairs contractors have been reluctant to work on eleven out of sixteen sites across all management styles. A Gypsy-Traveller interviewee noted that repair workers are sometimes a bit frightened of residents and said in this context as a species of explanation: *'my mum's bark is worse than her bite'*.

Gypsy-Traveller Comments

3.97 As is common with social housing tenants, the repairs service was the element of site management attracting most comment. Opinion varied widely between authorities and sites. The first thing one woman said was *'the Council have been very good, everything we ask for to be done, they've done it . . . they've done everything inside and out'*. Others were equally appreciative on this and on some other sites.

3.98 However, residents were much more critical on other sites and a common comment was *'the Council never do anything for you'* or comments on repairs were preceded by *'when we can get them to'*. The main points of criticism are:

- Inconsistency - that is, the perception that something is done for one person but not for another.
- Refusal to accept responsibility for faults and carry out work, while at the same time preventing or discouraging residents from doing work for themselves.
- Delay - slow or non-existent response to repair requests, or making promises and nothing happens.
- Lack of written acknowledgement of repair requests and a general reluctance to put anything in writing.

3.99 None of these perceived faults are unknown in bricks and mortar housing. Nor is another issue which can arise - residents reporting something as a repair which the landlord appears to treat as an improvement. Work to pitch boundaries falls into this category. There were no particular criticisms by residents of the quality of repair work carried out.

Services

3.100 There can be issues about the provision of and payment for basic services on sites.

Electricity

3.101 Residents have no choice of electricity supplier on any site. In this respect residents have less choice than residents in permanent housing, and this was recognised and resented by some Gypsy-Travellers interviewed.

3.102 Residents pay for electricity by a pre-payment/card meter on all save two sites. Supply is metered and payment made via the local authority on Carmarthenshire Penybryn and on Rhondda Cynon Taf Beddau (not a designated Gypsy-Traveller site).

3.103 Case studies show different approaches to the supply of electricity cards, for example from the site warden, council offices or local shops. Pricing of cards/units of electricity is obviously an issue in some places. In one area card prices did not change for almost ten years and were then raised significantly, leading to complaints. In another area, electricity pricing is a major issue with site residents which was raised at length in most interviews. Interviewees thought that they were being denied a rebate and treated unfairly relative to house dwellers. The local authority interviewee was well aware of the issue but insisted that there was no such discrimination and that site residents were actually being charged for electricity at a rate lower than the normal domestic tariff. Interviewees across sites commonly reported spending £20 a week on electricity cards and sometimes up to £30.

3.104 In two areas, site managers review the sale of electricity cards as an indication of possible unauthorised tapping into supply to avoid metering. This is seen as quite unacceptable because of safety aspects as well as criminality. In one area, a blatant case had led to eviction in the past.

Water

3.105 Water is most frequently paid for through a standard charge which is not directly related to usage. At Torfaen Shepherd's Hill the total site water bill is apportioned between residents. At the two sites in Neath Port Talbot and Carmarthenshire Penybryn residents are charged according to individual metered usage. No identifiable charge is made at five sites (Blaenau Gwent Cwmcrachen, Flintshire Riverside, Gwynedd Llandygai, Powys Withy Beds and Swansea Tygwyn). Case studies suggest that this is a pragmatic decision to save the costs of collecting relatively small amounts of money from residents in receipt of housing benefit. Site residents liked the fact that there is no additional charge and felt it made licence fee payments good value. In Rhondda Cynon Taf Beddau there is a dispute with the supplier as to payment methods.

Gas

3.106 LPG is used by residents on all sites, mainly for cooking and sometimes for heating. For site managers, the main issue is disposal of empty cylinders. Supply companies are thought not to be very helpful here. Gas can be a significant expenditure for residents, with charges of up to £30 a week being reported.

Refuse Collection and Bulky Items

3.107 Normal refuse is collected from individual pitches on thirteen out of eighteen sites. It is collected from a central point or points on five sites, four of which are managed by the Gypsy Council. No additional charges are made for refuse collection. Site residents normally noted regular, unproblematic refuse collection although interviewees on one site resented having to buy their own black sacks.

3.108 Regular removal for bulky items of refuse is arranged on four sites (Blaenau Gwent Cwmcrachen, both Neath Port Talbot sites and Wrexham Ruthin Road). At Torfaen Shepherd's

Hill and at Swansea Tygwyn residents take bulky items to the tip themselves. On other sites, a skip is provided or collection is arranged on an ad hoc basis as needed.

3.109 Dumping, fly-tipping and general accumulation of trade and other refuse on or around sites is an issue for Gypsy-Traveller site managers. Some members of the settled community are thought to take advantage of Gypsy-Traveller sites to get rid of unwanted material. Site residents are sometimes engaged in gardening and tree work or construction work as well as scrap dealing which leads to accumulations of trade waste to be disposed of. Landfill charges and access policies at household waste sites mean that there is a disincentive to dispose of waste 'properly'. The issue was discussed in two case studies:

- In Flintshire, Riverside is immediately opposite and shares an access with a big scrap-yard. Material is fly-tipped regularly outside the site. The site manager has an arrangement with the scrap-yard that they clear fly-tipped materials turn and turn about. The site manager takes it to the council tip to dispose of.
- In Blaenau Gwent, the site manager at Cwmcrachen has arranged for the provision of a lockable compound with a green skip for tree loppings. This is emptied twice a week and is seen as extremely effective in reducing levels of fly-tipping as well as increasing recycling.

Postal Deliveries

3.110 Post is delivered directly to individual residents/pitches on nine sites. On five sites (Blaenau Gwent Cwmcrachen, Carmarthenshire Penybryn, Gwynedd Llandygai, Flintshire Riverside and Neath Port Talbot Briton Ferry) it is delivered via the site warden or to the site office. Residents collect their own mail from the post office at Powys Withy Beds and Wrexham Ruthin Road. Authority respondents reported problems with postal deliveries on four sites. Problems leading to the Post Office refusing to deliver to individual pitches include perceived threatening behaviour and uncontrolled dogs. In Swansea such problems were successfully resolved. Mail deliveries at Wrexham Ruthin Road have been and are still problematic:

Post was always delivered to warden's office via an external mailbox. Mailbox was then set on fire which also damaged the office. We then arranged with the PO to deliver mail to the site office when the wardens were on duty. The warden would then sort the mail and distribute it to plot-holders. Allegations from certain residents that the wardens were opening the mail or sending some back to the PO. Due to these allegations we then stopped handling the post, therefore we supplied and fitted external mailboxes to each utility block. We then offered our services to the PO and stated that our wardens would accompany the postman/woman on their rounds. This worked for a while until the postman was bitten by a dog. The PO now refuse to deliver post to the site, therefore residents now have to pick up their mail from the PO.

3.111 The case studies included sites where mail is delivered to individual pitches and where it is left at the site office and distributed to residents by the site manager. Despite the concerns raised over postal deliveries to the Equality of Opportunity Committee, the issue was rarely raised in this research and did not appear to present significant problems in the areas covered. Issues were occasionally reported to arise when the usual postman was off. Relief postmen were sometimes less familiar with delivery routines or more likely to be intimidated by dogs (the regular postman on one site comes armed with 'doggy treats').

Management and Relations with Residents

3.112 Relations between site residents and management and between site residents and settled neighbours are quite difficult to define and summarise. The site provision and management survey asked a number of questions intended to throw light on the questions.

Relations with Settled Neighbours

3.113 The survey asked about instances of disputes between site residents and the settled community over the last year. Respondents for eighteen sites provided information and noted such disputes on five sites (Carmarthenshire Penybryn, Neath Port Talbot Caegarw, Pembrokeshire Catshole Quarry and Under the Hills, and Wrexham Ruthin Road). Further details were provided by Carmarthenshire, Pembrokeshire and Wrexham. At Penybryn there were accusations of trespass and damage to fences. At Catshole Quarry the complaint was of rubbish dumping/fly-tipping on the access road and foreshore of the estuary close to the site. At Under the Hill there was an allegation of vandalism and nuisance from children. At Ruthin Road the complaint was of anti-social behaviour by individuals from the site. The issue has been resolved in that the person involved has now left the site. A 'CRASBO' (criminal related anti-social behaviour order which can be made against an individual who has been convicted of a criminal offence) was issued on this individual.

3.114 Problems with settled neighbours were not reported as significant in case study interviews.

Problems Between Site Residents

3.115 The next question in the site provision and management survey asked about problems on the site between residents. In the last year there had been issues as follows:

Disputes between residents	9 sites
Intimidation	5 sites
Vandalism	5 sites
Other anti-social behaviour	6 sites

3.116 Five sites had suffered none of these problems in the last year (Blaenau Gwent Cwmcrachen, Flintshire Riverside, Pembrokeshire Kingsmoor, Powys Withy Beds and Torfaen Shepherd's Hill). These sites include examples of each management style. Three sites had experienced one problem and four had experienced two. On this measure the most 'problematic' sites are Caegarw and Briton Ferry in Neath Port Talbot (both said to have suffered disputes, intimidation and other anti-social behaviour) and Carmarthenshire Penybryn and Wrexham Ruthin Road where all four problems had occurred.

3.117 The average number of problems experienced is, interestingly, highest for in-house managed sites with a site warden or manager and lowest for in-house managed sites with no site warden or manager. This could suggest that staffing levels reflect the need for staff input - it might also suggest that authorities without site wardens or managers are unaware of tensions on some sites. There is no significant difference in the average number of problems experienced on sites which house a single Gypsy-Traveller group and those which have more than one group. This is interesting given that mixing ethnic groups is often said to increase tensions. There is no relationship between problems and whether the site is purely residential or has both residential and transit pitches. However, the average problem score on sites with

some vacant or closed residential pitches is more than twice that of sites with no such vacant or closed pitches - suggesting a possible relationship between behaviour on site and demand for the site.

3.118 Respondents were asked what procedures are normally followed in dealing with disputes or forms of anti-social behaviour. Answers were relatively unspecific, but referred to investigation and the site warden speaking to people. In Carmarthenshire, cases may be referred to a specialist anti-social behaviour team. Wrexham provided the fullest answer:

Investigation into complaint. Possible breach of licence conditions, therefore letter sent to person(s) causing problems. If problems persist, then possible legal action could result in them losing their plot. Mediation is also used where necessary.

3.119 Perhaps surprisingly, the case study interviews placed little weight on disputes between residents. Reference was made to issues in relation to Waterloo in Pembrokeshire where families of Irish Travellers had been housed on a site perceived as the particular domain of a Welsh Gypsy family who had occupied the land since before the creation of the site, and at Rover Way in Cardiff where again both Irish Travellers and Welsh Gypsy-Travellers are accommodated. In both instances, conflict was said by site managers to have reduced as the different factions got used to each other although this seemed to be through avoidance rather than integration. Residents interviewed on one site were well aware of tensions between residents. The main specific complaint concerned behaviour by children perceived as anti-social by an elderly woman. On another site, a wall had been built between the pitches of families who did not get on; younger members of the families were said to be much less hostile to each other.

Complaints Procedure

3.120 There is a formal complaints procedure which site residents can use to make a complaint about the site manager or management issues on twelve out of seventeen sites. Those without formal complaints procedures include three managed by the Gypsy Council and Blaenau Gwent Cwmcrachen and Swansea Tygwyn. Most sites managed by housing departments will come under general tenant complaint procedures.

Resident Consultation

3.121 Site residents have been consulted on matters to do with site management, repairs or site improvements over the last year on six sites (Blaenau Gwent Cwmcrachen, Flintshire Riverside, Pembrokeshire Waterloo, Powys Withy Beds, Rhondda Cynon Taf Beddau and Wrexham Ruthin Road). Verbal consultation with individual residents was the most common method used on five out of the six sites. Other methods were regular site forums or consultative groups (Flintshire Riverside and Wrexham Ruthin Road), off-site meetings (Powys Withy Beds) and letters.

3.122 The main consultation exercise reported in the case studies was over the future of the Waterloo site in Pembrokeshire. The consultation had been carried out by the local Communities First Partnership, using pictures to illustrate the future options. Site closure coupled with the development of an 'ethnic housing estate' for site residents was the option preferred over closure followed by movement to empty pitches on other sites or to houses on ordinary estates, or the development of another site. More generally, the impression was given

that consultation with residents is uncommon in any formal sense although managers may informally sound residents out individually on an issue.

3.123 This view is supported by resident perceptions. There was a feeling of lack of consultation. While some residents would obviously welcome more consultation, others appear perfectly happy with the current situation. On the sites where repairs were criticised, what is most wanted is action not consultation. There was little evidence of any joint action by residents, nor indeed familiarity with the concept. On one site primarily occupied by one family, when asked how decisions among residents are made, the answer given was: *'we're all equal. We get together and agree who will speak for us'*. Such concerted action seems rare.

3.124 Members of the settled community living near the site had not been informed or consulted about any matter to do with the site over the last year at any site.

Liaison with Other Services

3.125 One potential role of site management is to facilitate contact between site residents and other service providers. This might be easier with communal premises on site to act as a base. There is a site office at only seven sites (out of eighteen). There are other communal premises at two sites only (Rover Way and Shirenewton in Cardiff).

3.126 Table 3.5 shows the number of sites where specified services are said to visit regularly and where they visit on an ad hoc basis following specific requests or complaints.

Table 3.5: Visits to Sites by Other Service Providers

Service	Regular visits	Ad hoc visits	No visits
Health visitors	10	-	7
Education workers	9	2	6
Social workers	8	2	7
Police	2	12	3
Housing advisors	2	4	12
Benefits advisers	1	5	11
Welfare advisers	1	3	13
Employment advisers	-	4	13
Library service	-	1	16

Source: Site provision and management survey

3.127 As can be seen, the most regular visits are made by health visitors, education workers and social workers. The police is the service visiting sites most frequently overall, but normally on an ad hoc basis. Benefit, welfare, housing or employment advisers rarely visit. A play-bus visits Cardiff sites regularly for pre-school children. An issue is said to be preventing disruption by older children not in school.

3.128 Service providers have been reluctant to visit six sites. In Pembrokeshire (Catshole Quarry) this was because of little demand for their services. At Swansea Tygwyn this was said to be because of problematic stereotypes of Gypsy-Travellers. At the two sites in Neath Port Talbot and at Carmarthenshire Penybryn it was said to be because of intimidation. The Wrexham Ruthin Road answer was:

Due to the potential of possible verbal/physical abuse from certain individuals on site. Also the possibility of having their vehicles vandalised. Resolved for certain service providers by offering the services of our wardens on site to watch over their vehicles and to accompany them whilst on site.

3.129 This illustrates the importance of having site wardens in some circumstances to ensure that residents can access services. Some site managers in the case studies clearly saw themselves as 'a middleman' between site residents, local authority, police and local people. Relations were generally reported to be good with Traveller education workers and health visitors working with Gypsy-Travellers. The Flintshire site manager referred to two specific actions taken on behalf of site residents - both of which were recognised and appreciated by residents. He had acted for residents when the minibus which takes children to school was regularly late. He had also built up a relationship with the police so that they would not simply drive onto the site if they were looking for someone. Instead they would contact the manager who would tell them whether or not the person sought was on site. Mutual trust had developed such that the police took his word if he said they were not there. One further example of specific liaison with other agencies was the successful involvement of the Environment Agency over dumping on a Pembrokeshire site.

SITE FINANCES

3.130 The site provision and management survey asked a number of questions about site finances including income and expenditure. Not all respondents were able to provide the information requested.

3.131 Respondents were able to say in general terms how full annual costs of management and maintenance relate to site income for sixteen sites:

Costs generally greater than income	11 sites
Costs generally equal income	1 site
Costs generally less than income	4 sites

3.132 Thus most sites (69%) require some form of revenue subsidy since costs normally exceed income. The sites (31%) where costs normally equal or are less than income are: Blaenau Gwent Cwmcrachen, Flintshire Riverside, Caegarw and Briton Ferry in Neath Port Talbot and Torfaen Shepherd's Hill. All except one of these is managed by the Gypsy Council. All have full-time site wardens/managers. One obvious factor in this is level of licence fees charged. The average licence fee for sites where costs are greater than income is £33.63, compared with £52.35 for sites where costs are equal to or less than income. Generally lower licence fees may also explain differences from the pattern in England where costs exceed income on only 52% of sites.

3.133 Authorities were asked to provide detailed breakdown of site income and expenditure in the year 2004/5. Some information was provided for fourteen sites (not Flintshire Riverside, Gwynedd Llandygai and Merthyr Tydfil Glynmil which are all managed by the Gypsy Council or in-house managed sites in Carmarthenshire and Swansea). Some authorities with more than one site were unable to attribute costs or income to individual sites, and some were unable to provide information in the spending categories requested. Examination of the information also suggests that authorities are making different decisions on how to divide costs between staffing, routine repairs and other management costs. The figures are valuable to demonstrate some more general points:

- In the year 2004/5 expenditure exceeded income for ten of the fifteen sites covered.
- While 'surpluses' are modest, 'losses' can be large. For example, the income from the five Pembrokeshire sites was £132,030 and the expenditure was £202,290; the income from Wrexham Ruthin Road was £38,368 and the expenditure £192,912.
- Because of this, across the sites as a whole expenditure far exceeds income. Income was around £615,000 while expenditure was double this sum at around £1,240,000.
- The sites included in the analysis have 293 pitches in total (270 said to be occupied). Across these sites as a whole, the net annual expenditure thus approximates £2,130 per pitch (£2,315 per occupied pitch). Other things being equal, licence fees would have to rise by more than £40 a week for sites to break even financially.
- Because of apparent discrepancies in the way repairs are treated in the figures it is not possible to identify how much is spent each year on the site fabric. However, it appears that spending on planned rather than responsive maintenance is relatively modest at around £93,000 across the fifteen sites. Most of this is accounted for by Cardiff and Powys.

4. AN ESTIMATE OF GYPSY-TRAVELLER ACCOMMODATION NEED

4.1 This chapter makes an estimate of need for Gypsy-Traveller accommodation across Wales over the next five years. It draws on material already presented, especially in Chapter 3, but also introduces new information on the extent of unauthorised camping. The chapter starts with a brief discussion of methods and an outline of the approach adopted. Sections follow on different elements of accommodation need: household growth; overcrowding and poor conditions; waiting lists and movement desires; unauthorised development; and unauthorised camping and nomadism. The next section looks at Gypsy-Traveller accommodation preferences and aspirations as evidenced by stakeholder and Gypsy-Traveller interviews. These various elements are brought together into an estimate of need. A final short section discusses issues relating to need, including whether the estimates can be regarded as expressing 'need' or 'demand' for accommodation.

A DISCUSSION OF METHODS

4.2 Methods of assessing the accommodation needs of Gypsy-Travellers are still developing. Very crude estimates were made at national level in England in 2003 based on caravan count information²⁶. Further estimates have been made or are being made at regional level²⁷, and by individual and groups of local authorities (for example, Surrey, South and West Hertfordshire, Cambridgeshire and Essex). Welsh Assembly Government issued a Consultation Draft *Local Housing Assessment Guide* in July 2005. While this covers all housing assessments, Annex E deals specifically with Gypsies and Travellers and points out some distinctive features of the population group with implications for the approach to needs assessment. ODPM have recently issued draft practice guidance on Gypsy and Traveller Accommodation Assessments in England²⁸.

4.3 This section looks first at current needs assessments in Wales, then outlines the approach adopted for the current research.

Gypsy-Traveller Accommodation Needs Assessments in Wales

4.4 A literature survey has revealed very little recent material which is helpful. Three very useful pieces of research were carried out by the (then) University of Wales College of Cardiff either for or in association with the (then) Cardiff Gypsy Sites Group in the early 1990s. These dealt first with family growth on official sites in Cardiff²⁹, then with housing³⁰ and finally with roadside living³¹. Taken together these reports suggest a significant unmet need for site pitches in Cardiff - almost 50 additional residential pitches required to accommodate family growth up to 1997 and almost 30 pitches for temporary (up to three months) or emergency stopping (for a few days). There appeared to be little spontaneous positive demand for bricks and

26 Pat Niner, *Local Authority Gypsy/Traveller Sites in England*, ODPM, 2003, Tables 7.1 and 7.2

27 For example, Pat Niner, *Gypsies and Travellers*, West Midlands Regional Housing Strategy, West Midlands Regional Spatial Strategy Shared Evidence Base, Centre for Urban and Regional Studies, 2005, <http://www.curs.bham.ac.uk/pdfs/GT%20report%20FINAL.pdf>

28 ODPM, *Gypsy and Traveller Accommodation Assessments, Draft Practice Guidance*, February 2006

29 John Brookes, *Survey of Family Growth on the Official Sites for Travellers in Cardiff*, Centre for Housing Management and Development, Department of City and Regional Planning, University of Wales College of Cardiff, 1992

30 PA Thomas & S Campbell, *Housing Gypsies*, Cardiff Law School, University of Wales, Cardiff, 1992

31 John Brookes, *Survey of Gypsy Travellers Living by the Roadside in South Glamorgan*, Centre for Housing Management and Development, Department of City and Regional Planning, University of Cardiff, 1995

mortar housing at the time. None of this additional accommodation has been provided since the research. It seems probable that many Gypsy-Travellers have moved into housing in the period since 1992, partly at least because they could not find a place on a site - at least 90 families are known to be in housing in Cardiff and possibly as many as 280 (Cardiff Gypsy and Traveller Project files).

4.5 The general policy survey carried out as part of the current research asked local authorities about needs assessments they had made more recently. While thirteen of the 22 responding authorities had made an assessment of general housing needs in the past five years, none of these assessments included an explicit recognition of the needs of Gypsy-Travellers. None of the authorities had carried out a specific assessment of need and/or demand for accommodation for Gypsy-Travellers within the last five years although eleven plan to do so.

4.6 Not all authorities were able to give an indication of the methods they propose to use. The following illustrate comments made:

Gwynedd: Collect information from the relevant Officers about past and recent trends, work in partnership with the Police and the Health Service, attempt to establish consultation systems with Gypsies and Travellers.

Powys: Looking to work in conjunction with the Powys Local Health Board and to consult with the Gypsy-Traveller community locally.

Rhondda Cynon Taf: Assessment of need has been written into brief for general housing needs survey to be carried out during 2005/06. Once tender has been accepted we anticipate assessment of need for this particular group will be carried out through interviews/survey and other methods appropriate to glean as much information as possible on local situation. Currently assessment will be carried out for this authority alone.

Wrexham: We are currently carrying out an assessment of housing needs. We have budget provisions to specifically assess the needs of Gypsies and Travellers and are currently investigating whether or not to do this through more specialised or localised methods.

4.7 In this context perhaps it is not surprising that the majority of local authority respondents said that they did not know the current level of need for further Gypsy-Traveller accommodation in bricks and mortar or sites. This seems to be because of a lack of needs assessment, but also because of difficulties in establishing evidence of demand from normal sources (eg waiting lists) where there is no current site provision. As Ceredigion comment: *Exact position is difficult to establish/not known. There is currently no expressed need or record of requests for this group.*

4.8 No authority identified a quantified need from Gypsy-Traveller families for houses or flats although Flintshire reported a steady demand from relatives of settled Gypsy-Travellers. One authority (Monmouthshire) identified a need for a residential and a transit site. Blaenau Gwent identified a need for five transit pitches, and Merthyr Tydfil an unquantified need for transit sites/pitches. Carmarthenshire identified a need (unquantified) for transit pitches and emergency stopping places. Pembrokeshire identified a need for emergency stopping places but a reduction in the number of residential pitches. Wrexham commented that there is a possible need for residential sites/pitches and a probable need for transit pitches and

emergency stopping places. In general, authorities are more likely to identify transit than residential site needs.

4.9 Very few authorities offered views as to whether further sites/pitches should be provided privately or by the local authority. Of those giving an answer, more favoured local authority than private provision.

4.10 These findings suggest an almost complete lack of information on local accommodation needs of Gypsy-Travellers in Wales, and considerable uncertainty on the part of local authorities about how to make assessments. There is no possibility of making a national assessment by amalgamating local estimates.

Approach Adopted to Assessing Accommodation Needs

4.11 The needs assessment 'model' is based on the approach developed in work carried out for local authorities in South and West Hertfordshire in 2004/05³². It seeks to look at need elements as far as possible in the same way as for mainstream housing assessments, but with attention also to the particular evidence of need specific to Gypsy-Travellers. The elements included are:

- Household growth and family formation: based on information collected in the research and some assumptions from elsewhere.
- Overcrowding and poor conditions on sites: draws on information from the condition survey and other elements of the research.
- Movement desires and waiting lists: based on information on Gypsy-Travellers registering demand for social housing and for site places, and speculates on levels of movement between different forms of accommodation.
- Unauthorised development of sites: looks at levels of unauthorised development of Gypsy-Traveller sites, both as an indication of need for authorised accommodation and as an indication of demand for owner-occupation.
- Unauthorised encampments and nomadism: in the absence of information from regular caravan counts, based on authority accounts of unauthorised encampments and trends gathered in the general policy survey.

4.12 The aim in bringing these elements of need together is to estimate how many additional units of accommodation will be required over the next five years across Wales (this is not the same as the need for new provision since no account is taken in this chapter of likely supply - see Chapter 5). Introducing material from stakeholder and Gypsy-Traveller interviews is intended to clarify how much of this need is for Gypsy-Traveller site provision and to suggest, in very general terms, how much might be met by Gypsy-Travellers themselves and how much by local authorities. Some general statements are made about the location of need within Wales.

³² Centre for Urban and Regional Studies, *An Assessment of the Accommodation Needs of Gypsies and Travellers in South and West Hertfordshire*, University of Birmingham, 2005

AN ESTIMATE OF ACCOMMODATION NEED IN WALES

Household Growth and Family Formation

4.13 In mainstream housing needs assessments it is usual to estimate the number of sharing and concealed households at present who need their own independent accommodation (current backlog of need) and the number of new households likely to form and require independent accommodation over a period of time (need from household increase). In seeking to calculate these elements in relation to Gypsy-Traveller accommodation we concentrate on people currently living in caravans/trailers on caravan sites. Some allowance for Gypsy-Travellers in housing seeking site accommodation is made below.

4.14 Basic information from which the calculation can be made has been presented in Chapters 2 and 3. At present the estimates are of need for accommodation, with no presumption as to the form that accommodation should take. Figures are rounded here to avoid an impression of spurious accuracy:

- There are estimated to be about 460 pitches on local authority and private sites in Wales (excluding those that are currently closed which could usually only be brought back into use with significant investment). Of these, about 440 are occupied. This figure of **440 is taken as the base for 'households'**.
- The 'doubling up' of families on a single pitch might be seen as an indication of the presence of 'concealed' households for Gypsy-Travellers. Local authorities reported 21 such doubled up households (para 3.26). This is thought to be an under-estimate. Doubling up reflects a number of factors - for example, age of site and maturity of resident families; size of pitch and management stance on permitting doubling up; availability/scarcity of alternative accommodation and especially pitches for newly formed households. It appears to be a variable phenomenon across Wales and particularly a feature of Cardiff sites where some pitches seem to be occupied by more than two family 'units'. To take account of this we assume a Welsh total of **60 'concealed' doubled up households** who would like accommodation of their own. This would bring the base of households - actual and concealed - to 500.
- Pitch occupancy on the eight sites for which information is available is 4.5 persons (para 3.25). In part this is a reflection of concealed doubled up households, but it also reflects large families, which in turn suggests rapid household formation as children grow up and marry. In Cardiff sites alone there are up to 30 young people around age 16 who will probably want to marry and have accommodation of their own over the next five years. In the Republic of Ireland the Task Force on the Travelling Community assumed a household growth rate of 4% a year in 1997 and this has proved very nearly accurate for the period up to 2004³³. Applying such an assumed growth rate in Wales would give up to **100 new households over the next five years**.
- Together these factors give a total estimate of need for an additional **160 units of accommodation** for Gypsy-Travellers from family growth over the next five years. This estimate is for permanent rather than temporary/transit accommodation.

³³ *Review of the Operation of the Housing (Traveller Accommodation) Act 1998*, Report by the National Traveller Accommodation Consultative Committee to the Minister for Housing and Urban Renewal, June 2004

Overcrowding and Poor Conditions on Sites

4.15 Some pitches on local authority sites in Wales are undoubtedly overcrowded at present. All caravans present on sites could only be separated by six metres on 42% of sites (para 2.66). We assume here that accommodating the doubled up, concealed households would reduce such overcrowding and do not make any further allowance.

4.16 The condition survey revealed a backlog of repair needs on some sites and an ongoing need for expenditure to maintain standards (Chapter 2). There is one area where poor conditions can be seen to constitute the need for 'additional' pitches. This is where minimum-facility transit pitches are being occupied long-term as residential pitches. There is a total of 33 transit pitches in Wales, of which 16 were occupied at the time of the site provision and management survey. Assuming between a half and two-thirds of these are being occupied on a residential rather than a temporary basis gives a need for **10 additional fully serviced pitches**.

Waiting Lists and Movement Desires

4.17 Waiting lists are a frequently used measure of expressed need for accommodation although there are dangers in their use which could lead to either over-counting (double registrations, out-of-date lists) or under-counting (potential applicants not applying because there is seen to be no chance of being housed). Waiting lists for both bricks and mortar and site accommodation are relevant here:

- The general policy survey asked local authorities to say how many Gypsy-Travellers had applied to them either as homeless or on the general waiting list over the last three years. Because Gypsy-Travellers are rarely identified in ethnic monitoring, only about half of authorities were able to make any sort of estimate. Where authorities were able to make an estimate, the average was about three Gypsy-Traveller applications a year per authority. This would give a total of about 70 a year across Wales. Authorities reporting most applications are Flintshire and Pembrokeshire; it is likely that Cardiff, which was unable to make an estimate, would also be important. Some of these applications may be being made because of a lack of site places available, but the proportion is unknown.
- Chapter 3 gave site waiting list figures (para 3.67). Only two-fifths of sites in Wales have waiting lists with current applications. Around 70 applications are currently recorded on them (for eight sites only). The main areas where sites have waiting lists are Cardiff, Flintshire, Torfaen and Blaenau Gwent.

4.18 A further consideration is the number of Gypsy-Travellers now in housing who have moved into housing not as a positive choice but because there is no site accommodation available for them. While there may be personal reasons for not wanting to move to a particular site, constrained movement to housing is more likely to be a feature of areas where sites are over-subscribed. Based on estimates of the number of Gypsy-Traveller families in social housing in their area, it seems that perhaps just over 1,000 Gypsy-Traveller families live in social housing across Wales. Assuming 5% to 10% would prefer to live on a site, this gives a range of 50-100 families requiring pitches.

4.19 There is clearly a danger of over-counting between the elements of need as expressed by waiting lists, assumptions of constrained movement into housing, concealed

households and family increase on sites. We have no way of estimating the extent of such double-counting, but it would obviously be wrong merely to add all elements together. Fairly arbitrarily we assume:

- All Gypsy-Travellers applying for housing actually want housing and therefore should not be included in the estimate for site needs (would tend to understate site need).
- Half of the need/demand expressed through site waiting lists and constrained movement from housing is not also included in estimates from concealed households and family growth. This gives a need for an additional **60-85 residential site places from waiting lists and movement desires** across Wales.

Unauthorised Development of Sites

4.20 Unauthorised development of Gypsy-Traveller sites without planning permission was discussed in para 2.36 et seq. It was estimated that there might be **25-30 families** currently accommodated in this way across Wales. Since these sites are, by definition, unauthorised, these families are in need of authorised, legal accommodation whether through the grant of planning permission on their own site or elsewhere. This need is primarily for permanent residential accommodation, and such families indicate by their actions a preference for private, owner-occupied provision.

Unauthorised Camping and Nomadism

4.21 In the absence of Gypsy Caravan Count information, the general policy survey asked all local authorities to provide basic information about unauthorised encampments in their area over the last three months. Depending on the date of their response this could cover a period broadly between March and October 2005, thus including a period over spring and summer. Instructions stressed that they should count as separate encampments any by the same family/group at different locations and/or any at the same location by different families/groups (or the same family/group on different occasions). Twenty-one authorities were able to provide specific information which is analysed below to give an estimate of the need for further accommodation.

Unauthorised Encampments by Local Authority

4.22 Table 4.1 provides basic information on the number of encampments over the three month reporting period by local authority area.

Table 4.1: Number of Unauthorised Encampments over Three Month Period by Local Authority

Number of camps	No. of LAs	Local authorities
None	5	Blaenau Gwent, Bridgend, Cardiff, Pembrokeshire, Vale of Glamorgan
One	6	Caerphilly, Conwy, Monmouthshire, Rhondda Cynon Taf, Swansea, Wrexham
Two	3	Carmarthenshire, Powys, Torfaen
Three	1	Denbighshire

Number of camps	No. of LAs	Local authorities
Four	1	Ceredigion
Five	1	Isle of Anglesey
Six	1	Gwynedd
Seven	1	Neath Port Talbot
Ten	1	Flintshire
Thirteen	1	Newport

Source: General policy survey

4.23 Number of encampments: A total of 60 separate encampments was reported. Information from the case studies and other sources suggest that authorities have not included all encampments in their returns. For example, case study stakeholder interviews suggest that there were two small ‘tolerated’ unauthorised encampments in Cardiff throughout the reporting period; there were unauthorised visitors on one site in Pembrokeshire during the case study visit; and a recent encampment was also mentioned in Blaenau Gwent - all reported no encampments in the survey. Encampments were known to Project Advisory Group members not included in the survey information. We have no way of determining the extent of under-reporting. It might be safe to assume that the encampments regarded by authorities as most problematic have been included. One way of dealing with this under-counting pragmatically is simply to multiply the three month figures by four to get encampments per year, ignoring the fact that a majority of authorities report more encampments in summer than in winter and that the reporting period excluded winter. Across Wales, this would give an estimate of some 250 encampments a year. Some authorities reported that the number of encampments had increased (including Flintshire and Newport) and others (including Swansea and Cardiff) that they had decreased. It is impossible to identify general trends from the information available.

4.24 Location of encampments: Table 4.1 shows that more than three-quarters of authorities in Wales had experienced at least one encampment in the reporting period and it seems likely that no authority is immune. Both predominantly urban and rural areas are affected. However, Table 4.1 also reveals particular ‘hot spots’ for unauthorised camping in Newport and Flintshire. Both are areas easily accessible from the motorway and major road network with populations (industrial and residential) potentially offering employment opportunities. Both are on routes to ports for Irish ferries. In both areas the number of encampments was said to have increased over the past five years. The figures in Table 4.1 and stakeholder interviews suggest most encampments occur in the northern and southern coastal corridors and along the Heads of the Valleys road. However, Ceredigion (Aberystwyth) complicates this simple pattern. It is perhaps safer to say that population centres and employment opportunities are the best locational determinant.

4.25 Number of encampments at one time: Most local authorities normally experience no more than one unauthorised encampment at a time. Three authorities (Cardiff, Carmarthenshire and Gwynedd) commonly have two, and Newport commonly has more than two at any one time.

4.26 Encampment size: About half of the reported encampments comprised up to five caravans, and a further quarter comprised between six and ten caravans. The largest encampments (in Powys and Flintshire) comprised 82 and 70 caravans respectively. Particularly large encampments were reported in Ceredigion (Aberystwyth and Borth); Denbighshire (Rhyl); Flintshire (Sealand); Gwynedd (Bala) and Neath Port Talbot (Aberavon); Powys (Builth Wells) and Newport - several appear to be holiday areas or connected with events (Royal Welsh Show). Encampment size was said to have increased over the last five years in Flintshire, Gwynedd and Isle of Anglesey, and to have decreased in Cardiff and Swansea.

4.27 Encampment duration: Encampment duration is a function of both the length of time the Gypsy-Travellers want/need to be in the area and the speed with which the local authority (or other landowner) acts to move them on. Over three-fifths of encampments lasted one week or less, and overall about three-quarters of encampments lasted up to two weeks. Encampments lasting longer than two weeks were mainly small and in isolated rural areas and/or on private land. The exception was Newport where eight encampments, mostly on industrial land, lasted longer than two weeks. Case studies suggest that action against encampments on council-owned land is generally taken promptly, suggesting that the short duration of encampments is at least partly due to local policies.

4.28 Land encamped: Just over half of reported encampments were on industrial estates, business parks etc and a further quarter were on car parks often associated with leisure or holiday facilities. The remainder were on the roadside, on cleared land or in a variety of remote areas. There is likely to be conflict with other users of the land in most instances.

4.29 Reasons for encampment: Some unauthorised encampments involve families who want to settle locally but cannot find a place on a permanent site, others involve those passing through an area who want to stay for a short period and then move on. In Monmouthshire most families involved in unauthorised encampments (a small number) are local; in Cardiff, Gwynedd, Newport and Swansea 'local' and transit encampments are equally common. Elsewhere most unauthorised encampments involve Gypsy-Travellers who are passing through. Some encampments are related to family events, others (most) to employment. The Royal Welsh Show attracts some 200/300 caravans to Builth Wells each July for about two weeks. A few authorities commented that encampments seem to be increasingly '*commercially driven*'; some noted a trend from 'Gypsies' to 'Travellers'.

Other Public Landowners and Unauthorised Encampment

4.30 A letter was sent to major public landowners in Wales to check the extent of their experience of unauthorised encampment. Replies were received:

- Two divisions of the Welsh Development Agency (North Wales and Mid Wales) together have experienced seven to thirteen encampments a year (mostly in the North) over the last three years. The average size of encampment is five or six caravans. Extrapolation across Wales on WDA land might be about twenty encampments a year.
- Dwr Cymru Welsh Water have experienced no unauthorised encampment over the past three years.
- The Forestry Commission since 1998 has experienced four encampments: three affecting the same piece of woodland in Pembrokeshire and one near Denbigh.

Two Pembrokeshire encampments had nine and twelve vehicles, the other two were single family encampments. All encampments were by New Travellers.

- The National Trust has experienced three encampments over the past three years: one in Snowdonia over a weekend; one near Wrexham which moved on without action after about two weeks; and a large group of New Travellers in Pembrokeshire.

4.31 In addition, information was provided by Welsh Assembly Government about encampments on highway land including land being assembled in advance of road schemes. They have experienced three unauthorised encampments since 2001: two at Abergavenny and one at Briton Ferry. Each involved three or four caravans.

An Assessment of Need from Unauthorised Encampment

4.32 Bringing this information from local authorities and major public landowners together to form an estimate of need for accommodation, we conclude:

- The majority of accommodation need from unauthorised camping is for some form of temporary or transit accommodation. Perhaps an additional **20 families** across Wales currently travelling and stopping on unauthorised encampments require permanent residential accommodation. This need not be site places - an interviewee in the Flintshire case study reported a steady trickle of applications for housing from families on unauthorised sites although they often moved on before being accommodated or were otherwise debarred from an offer (for example having outstanding arrears or an intentionally homeless decision against them).
- Authorised temporary or transit accommodation should be provided because locations currently encamped are unsatisfactory for both Gypsy-Travellers and the settled community.
- Extrapolating from the survey figures, on average there might be about five encampments a week, normally comprising up to ten caravans, across Wales during the eight months between spring and autumn - a minimum requirement of 50 spaces. This does not take account of major events such as the Royal Welsh Show.
- Given the need for flexibility, for catering for different groups who may not wish to share sites with each other, and for inevitable vacancies, there is merit in considering the provision of a greater number of smaller sites rather than fewer larger ones. Within this variety, the needs of New Travellers seeking places to stop in remote, out-of-the-way places require consideration.
- To be effective in accommodating mobility, there has to be a network of sites so that families can move on. This again argues for a number of sites/places rather than the strict paper minimum.
- The Republic of Ireland Task Force applied a multiplier of about four to calculate the number of 'transient' pitches needed from a known number of 'transient' families. Given that some (unknown proportion) of the encampments reported in Wales were the same family/group moving to other locations, a multiplier of four is probably excessive. A multiplier of two on estimated number of encampments

would give a total of **100 spaces on around ten sites**; a multiplier of three would give **150 spaces on around fifteen sites** across Wales.

- Most transit provision should be related to major roads and motorways along the northern and southern coastal corridors. Provision should also be made on other major routes across Wales. Provision is also required in the area around Aberystwyth. Arrangements to regularise visits to the Royal Welsh Show at Builth Wells is an example of provision needed for a specific event.

An Accommodation Needs Summary

4.33 The estimates of need for permanent accommodation made above are summarised in Table 4.2. As can be seen, this gives an estimate of need for permanent accommodation for 275 to 305 families. This compares with 400 ‘open’ residential pitches estimated on local authority and private Gypsy-Traveller sites and other caravan sites - a 75% increase over current residential pitch provision³⁴. Since most of the need is from concealed households and family growth on existing sites, it is geographically concentrated in areas where there are already successful Gypsy-Traveller sites. We believe that the general lack of information about Gypsy-Travellers and their needs mean that needs are hidden, and that the estimates are likely to under- rather than over-estimate needs.

Table 4.2: Summary of Estimate of Need for Permanent Accommodation in Wales 2005 to 2011

Element of need:	Number
Concealed/doubled up households	60 families
Family growth 2006-2011	100 families
Conversion of transit pitches	10 families
Residual need from waiting lists and movement from housing	60-85 families
Unauthorised development	25-30 families
‘Local’ need from unauthorised encampments	20 families
Total	275-305 families

4.34 It is estimated that between 100 and 150 places are required across Wales to accommodate temporary needs from Gypsy-Travellers while travelling in order to reduce greatly the need for unauthorised encampments.

4.35 Both estimates are somewhat abstract calculations on the basis of the best information currently available and incorporate a number of assumptions. Chapter 5 looks at how those needs might be met. To assist in deciding on what options there are, the next section looks at comments made by Gypsy-Travellers about alternative forms of accommodation and their

³⁴ Studies in Hertfordshire in England show that estimated need for residential pitches is equivalent to at least twice the existing number of local authority pitches. The estimate for Wales is lower, reflecting the apparent variability of need/demand across the country.

own needs and aspirations. This material also acts as a reality check on the abstract estimates made thus far.

GYPSY-TRAVELLER PERSPECTIVE ON ACCOMMODATION NEEDS

4.36 This section looks first at Gypsy-Traveller interviewees' comments about their own accommodation and aspirations, and at their particular concerns. The two following sub-sections discuss general attitudes expressed towards site, and bricks and mortar accommodation - this is intended to help determine whether the needs estimated earlier in this chapter can be safely regarded as being for residential site places or for housing. The final sub-section looks at current travelling patterns and views on accommodation for facilitating travel.

Accommodation Plans and Aspirations

4.37 Gypsy-Travellers living in a variety of forms of accommodation were interviewed. Most were living on local authority sites, but a number were in social rented houses or flats, two on private sites and two on unauthorised sites.

4.38 Where a definite view was expressed, most interviewees seemed to be content with the form of accommodation they were living in. One clear exception is a family on an unauthorised site who was waiting for a pitch on the local council site. (The other interviewee on an unauthorised site was a New Traveller who was quite happy where she was on privately owned land, and just wanted to be permitted to follow a low-impact, green lifestyle.) A few were more than content, especially on one local authority and one private site.

4.39 A number of interviewees on local authority sites wanted to stay where they were, in some instances they would like some improvements made to their pitch or amenity unit which would make it more desirable. None of the housed Gypsy-Travellers interviewed were seeking a site place at present in their current circumstances, for example while children were in school or a family member was ill, although some seemed to be hankering after a return to trailer living at some future date³⁵. Two of the interviewees on local authority sites said that they would like a house and one couple thought that they might do so in a few years time.

4.40 Two of the interviewees had distinct personal aspirations to buy land and develop a site for their family - both had members of their close family who had developed private sites. For many other interviewees, the idea of a family private site appeared relatively unfamiliar and so improbable that it was not clear whether or not it was something they would like.

4.41 The sample of Gypsy-Travellers interviewed was not fully representative, and their views cannot be generalised to all Gypsy-Travellers in Wales. However, the interviews give the impression that sites are desirable and that there is a minority aspiration for developing family sites on private land. They raise a slight question mark over the extent of demand there might be from housed Gypsy-Travellers to move onto sites.

³⁵ This chimes with similar findings by Glenys Parry et al, *The Health Status of Gypsies & Travellers*, University of Sheffield, 2004

Accommodation Concerns and Proposals

4.42 The overwhelming concern expressed was over future places on sites for children when they come to marry. The case studies include a number of the obviously successful sites with waiting lists. Interviewees were familiar with the lack of options which leads to doubling up and overcrowding, and reluctant movement to houses or, apparently much more rarely, onto the road (one stakeholder interviewee noted that many young people born on sites no longer have the skills needed for a life on the road). On these sites at least there is no doubt about the existence of need and demand for pitches - interviews suggest that most need from family growth might be regarded as for pitches.

4.43 Some residents on the popular sites thought that there was scope for extending their site to create pitches specifically for sons and daughters. More generally, a number of interviewees in different forms of accommodation thought that there was a need nationally for more good sites to be developed. A New Traveller thought that three types of site are needed: sites for Gypsies; sites for New Travellers with some plots where people could stay for a few years while their children attend school and others where people would stay a shorter time while working in the area or needing to stop in an emergency; and 'sites' where New Travellers can pursue a really green, low impact lifestyle. The New Traveller sites would be less formal than the usual local authority Gypsy-Traveller site and could be provided by New Travellers themselves given land and planning consent.

4.44 For a couple of interviewees an important concern was the constraints of the planning system on Gypsy-Travellers developing their own sites. One saw this as a form of discrimination. He wanted it made easier to get planning permissions for site development; another thought that Welsh Assembly Government should provide grants for land purchase and site development.

4.45 For one woman, a concern was the tendency for authorities to think of Travellers as '*one big family*', who all want the same thing, rather than as individuals who have their own lives and aspirations. She was keen that there should be freedom of choice for Gypsy-Travellers and, by implication, varied provision and options.

Attitudes towards Gypsy-Traveller Sites

4.46 Attitudes towards sites in general were influenced by the point of comparison: most were implicitly or explicitly comparing sites with housing, a few were comparing sites with travelling with no fixed base.

4.47 In the comparison with housing, sites were generally preferred as offering greater freedom. One family had moved from a house to give their children experience '*of their culture*'. Others said that their children were able to meet and mix with other Gypsy-Traveller children. It appears that it is the combination of trailer living and living in a like community which scores over bricks and mortar housing.

4.48 Comments on comparisons of sites and travelling were mixed. One woman (currently living in a house) thought that sites were much too controlled: it is nice to have a site orderly but '*you don't feel like it's your own*'. A man thought '*the worst thing that's ever happened to English, Welsh and Scottish Gypsies is sites. They are the next step to a house.*' His main complaint was the mix of communities on some sites '*Irish, house dwellers and Welsh Gypsies*' live there, encouraged by the facilities provided. Travelling from a site is impossible because

anything left behind may not be safe. The mix and lack of travelling, and by implication, cultural dilution produced means *'there really is no such thing as Gypsies any more'*.

4.49 One woman who was on the road for a period while waiting for a pitch on her site was quite clear about the advantages of a site over travelling in terms of security, ability to send children to school and facilities - especially a washing machine and dryer; she spoke of the *'peace'* of a site while children are at school and the chance to have some time to herself. Another woman thought that site provision encouraged greater settlement and allowed children to get better education and might, over time, change attitudes of the settled community towards Gypsy-Travellers for the better.

4.50 There are real, positive features of Gypsy-Traveller sites appreciated by many interviewees.

Attitudes towards Bricks and Mortar Housing

4.51 As might be expected, attitudes towards housing also varied widely according, in part, to previous experiences and current situation.

4.52 Most of those interviewed - regardless of current accommodation - had some experience of living in a house. A minority had none and also had no family members or friends in houses: *'no-one in our family ever lived in a house'*. For these, housing was an unknown quantity which they had no desire to try.

4.53 A few interviewees had had very bad personal experiences in houses. For example, one woman had been the subject of continued harassment from a neighbour while she lived in a house and had left when the neighbour tried to assault her son. At first she had attributed the problems to anti-Traveller feeling but came to accept that this was not the case. Another woman had *'tried'* a house but it had been fire bombed before she even moved in. She abandoned the tenancy without understanding that she should give notice and now has former tenant rent arrears which would stop her ever getting another house. Several interviewees spoke of other, less extreme, examples of trouble from neighbours because they were Travellers - including a housed New Traveller who had had her camper van vandalised. In contrast, some spoke of very good relationships with neighbours, especially near neighbours whom they got to know well.

4.54 Neighbour problems described above point up the impression that for some the negatives around housing are not so much about the bricks and mortar structure as the estate and local social structure. Two interviewees, one a traditional Gypsy-Traveller and one a New Traveller spoke in almost identical terms about the sort of *'rough'* area they would be likely to be housed in and referred to crime levels and nuisance.

4.55 Negatives for houses themselves included the feeling of being *'trapped'* and being *'unable to breathe'*. Some Gypsy-Travellers have a genuine cultural aversion to bricks and mortar. A New Traveller spoke of the loss of open space as a major culture shock on moving into a house. She felt she had *'a different relationship with nature'* while travelling when she could sit outside with her children and *'watch the sunset, hear the birds'*. Again the quality and type of property is important: another New Traveller had experience of living in the private rented sector as a single parent. The sort of accommodation she could afford was *'not very nice'* and her current very elderly small caravan is seen as more comfortable, safer and warmer than the realistic alternative - *'my caravan is a really precious thing'*.

4.56 On the positive side, the facilities in houses are seen as better than on sites by many interviewees, especially for someone who is ill when facilities in an amenity unit are inappropriate. Some spoke of having more space in a house. When the contrast was with a crowded, mixed site, some spoke of the *'peace and quiet'* of a house and there being *'less hassle'*.

4.57 One very general comment seems perhaps to sum things up: *'There's no harm in houses for Travellers, but no good in it'*. Houses suit some people at some points in their lives and don't suit others. There is likely to be continuing movement both into and out of houses in future.

Travelling and Associated Accommodation

4.58 Only two of the Gypsy-Travellers interviewed were actively travelling in the sense that they had no fixed authorised base; two others were on transit pitches and did not regard themselves as 'settled'. Several others 'travelled' for a period every year or some years, sometimes to visit Gypsy-Traveller fairs, sometimes for family gatherings or holidays, sometimes because it is the way of life: *'we are Travellers, we go out in summer'*. Many interviewees, including some who no longer travel at all, had spent part of their lives actively travelling with no fixed base.

4.59 Attitudes to the experience of travelling varied dramatically. Some older interviewees remembered days when finding places to stop was easier and Gypsy-Travellers were more accepted by the settled communities they visited. Some younger people had memories of travelling which make the community feeling and relationship with nature sound idyllic. For others it was *'mental torture'* being without amenities and being moved on all the time and never having a chance to get straight. One young woman spoke of having to move on as soon as she got to know where the shops were. She was always new in schools and teased and called a Gypsy so she did not go to school much and cannot read or write properly.

4.60 There was general agreement that it is much less easy - or even impossible - to travel continuously now. As one couple said: *'we don't travel as much as we used to - most of the stopping places have been built on and most private caravan sites get booked up'*. A woman said that her nephew travelled with six children under thirteen but found it impossible to stop anywhere long enough to get them into school. She thought things were getting worse: *'the minute you stop they've got court orders to get you out'*. One woman thought that the change in attitudes to travelling on the part of the settled community was attributable to the behaviour of some Travellers who *'leave a mess after themselves'* and have *'kind of messed it up'* for everyone - *'it's a shame really, 'cos it's lovely to be able have your own freedom . . . and you can wander off'*.

4.61 People who still travel for short periods for family events or holidays generally appeared able to find accommodation relatively easily³⁶. Some stayed on family pitches elsewhere, and some certainly used holiday caravan sites without difficulty. Accommodation for fairs is usually arranged - although there are annual issues at the Royal Welsh Show at Builth Wells where the local authority has not provided an authorised site for visitors in recent years. Destinations appear to be across Wales and England, and sometimes Ireland.

³⁶ It may be that those with networks and knowledge of places to stop are more likely to travel, and those without are deterred and no longer travel. There is an enormous difference between short 'holidays' and a life of continuous travel without a base.

4.62 Travelling is seen by most as being an important part of the Gypsy-Traveller culture, even if they do not actively travel themselves. Opportunities for travelling are needed to keep the culture going and to keep in touch with distant family. Many interviewees wanted *'something to be done'* to make it possible for Gypsy-Travellers to continue travelling. Ideas put forward included:

- Developing transit sites where Gypsy-Travellers can stay. One woman referred to her experiences of travelling in France and stopping on motorway *'aires'* and thought that something similar would be very good. However, there were others who did not think transit sites would be a good idea, and that they would soon be vandalised.
- Having authorised sites, both local authority and private, with pitches big enough to accommodate family members for a short time. It appears that this already happens, but may lead to overcrowding. In this way, families could solve their own travelling issues.

SUMMARY AND DISCUSSION OF ISSUES AROUND 'NEED' FOR ACCOMMODATION

Summary of Estimated Need

4.63 Table 4.2 summarised the assessment of need for permanent accommodation across Wales as 275-305 families to meet current backlogs and accommodate family increase to 2011. There is nothing in the findings from the Gypsy-Traveller interviews to suggest this estimate is significantly incorrect. The interviews suggest that a variety of forms of accommodation is likely to be needed to meet these needs including permanent housing and private sites as well as local authority permanent sites. A tentative indicative breakdown between forms of provision (on a base of 300 units needed) is:

Local authority site places	150 to 200
Private site places	50
Bricks and mortar housing	50 to 100

4.64 These figures are indications only. The desired breakdown will change with the prospects of supply. If no additional site places are developed, then movement to houses will probably be greater. If sites are refurbished or redeveloped, demand may increase. If the development of private sites becomes a realistic option, demand for them could grow. The style of local authority site could also affect demand. For example, if local authorities were to develop small sites for single families they might attract some for whom the thought of mixing with other families is a deterrent to site-living. To a significant extent, demand and supply are closely inter-related.

4.65 Between 100 and 150 places were estimated to be needed to accommodate temporary needs of Gypsy-Travellers while travelling within Wales. Gypsy-Traveller interviews underlined the importance placed on being able to travel and to find places to stop for a period without being hassled by local authorities or police. They drew attention to some ways in which mobility can be accommodated through facilitating families in putting up their own friends and relatives³⁷. This possibility should certainly be considered. However, it seems unlikely to work for some of the groups travelling through Wales at present for employment rather than family/

³⁷ Note that this option is not the same as advocating the provision of transit pitches on residential sites which would be under the control of the site manager; visitors would be controlled by residents on their own pitches.

special event/holiday reasons. More formal provision seems to be needed to accommodate such families, with emphasis on management as well as provision.

Key Issues around Accommodation Need for Gypsy-Travellers

4.66 There are a number of key issues in relation to need for Gypsy-Traveller accommodation which are philosophical or political as much as technical. Four such issues are discussed here: need versus demand for accommodation; 'local' need for accommodation; low demand for site places; and the legal definition of a 'gypsy'.

Need versus Demand for Accommodation

4.67 A distinction is commonly made in mainstream housing assessments between 'need' and 'demand'. 'Demand' reflects individual preferences and aspirations and/or has economic overtones in the sense of effective demand for a commodity at a price. 'Need' for accommodation generally involves some form of normative judgement involving minimum space or quality standards and reflects accepted norms such as a separate home for every family. 'Need' is also sometimes taken as what should be provided by the public or social sector because some families/people 'in need' are unable to provide for themselves in the market. 'Need' for housing is likely to be higher than 'effective demand' because some people cannot afford to house themselves or have needs for specially adapted accommodation which the market does not supply. 'Need' may sometimes be lower than 'aspirational demand' because families prefer or aspire to better or larger accommodation than they 'need'. In other words the two concepts are closely inter-related.

4.68 Arguably, it is an even more complex issue in relation to Gypsy-Traveller accommodation for three main reasons:

- Central and local government politicians and officers are familiar, from their own experience, with alternative forms of permanent housing and usually feel confident in saying what is adequate and have some rules of thumb to determine what minimum accommodation a family of a certain size and composition 'needs'. However, most decision-makers are unfamiliar with Gypsy-Traveller culture and lifestyles and may find it hard, for example, to accept that families 'need' site provision rather than housing or 'need' to travel around in pursuit of traditional employment. This is even more extreme in the case of New Travellers coming from a 'settled' background but choosing a (semi-)nomadic lifestyle.
- Where Gypsy-Travellers pursue a travelling lifestyle it is not uncommon for them to have a stable base and also to travel and therefore to need some form of temporary or transit site accommodation at times of the year. The same family, therefore, potentially 'needs' several units of accommodation.
- If little is known, in the academic or policy sphere, about Gypsy-Traveller culture and lifestyles, still less is known about the Gypsy-Traveller economy. There has been no research so far to examine income or wealth among Gypsy-Travellers, and questions about occupations are sometimes side-stepped. This means that it is impossible to make any estimate of affordability of accommodation which would be required for an assessment of likely effective demand for owner-occupied sites (or housing). I would argue that this is not only unknown, but unknowable

in that families appear to pool resource to buy land or develop sites because the opportunity arises, but would not be able to say in advance that this would be possible.

4.69 The United Kingdom is signatory to the Framework Convention for the Protection of National Minorities which requires signatories to undertake to *'promote the conditions necessary for persons belonging to national minorities to maintain and develop their culture, and to preserve the essential elements of their identity, namely their religion, language, traditions and cultural heritage'* (Article 5). Gypsy-Travellers constitute a national minority³⁸ and living in trailers and being free to travel is part of their traditions and cultural heritage. The European Court of Human Rights has expressly recognised that the vulnerable position of Gypsies and Travellers as a minority means that some special consideration should be given to their needs and their different lifestyle both in the relevant regulatory planning framework and in arriving at decisions in particular cases. To this extent, there is a positive obligation imposed on States by Article 8 of the European Convention on Human Rights to *'facilitate the Gypsy way of life'*³⁹. Human rights and race relations legislation in England and Wales require that public bodies respect and accommodate Gypsy-Travellers' cultural and lifestyle preferences as far as possible without prejudicing other legitimate aims or interests.

4.70 In this context it could be argued that Gypsy-Traveller needs and preferences should be accepted as legitimate 'need' for accommodation.

'Local' Need for Accommodation

4.71 A further potentially contentious issue is whether the accommodation need identified requires additional site provision within any particular local authority area - or indeed within Wales itself. The question arises because providing Gypsy-Traveller sites often raises objections from the local settled community. Obstacles to site provision will be discussed further in Chapter 5, but here it is enough to say that site provision requires quite courageous political commitment and hard work. There is, therefore, often an understandable tendency to seek to minimise responsibilities in any particular community. One of the perceived defining features (not necessarily borne out in reality) of Gypsy-Travellers is their culture which embraces nomadism rather than settlement. It follows that an obvious way of minimising responsibility is to say that while need exists, there is no requirement that it should be met 'here'. This might operate in two ways:

- The England/Wales border obviously means little to many Gypsy-Travellers. For example, all the women interviewed on the local authority site in Flintshire had moved to it from somewhere in England; the New Travellers interviewed in Pembrokeshire were 'English'; and a Gypsy-Traveller interviewed by telephone had lived in several unauthorised encampments in Newport while she waited for a site pitch in England because she had heard that that local authority was more accommodating than others. In describing their extended families, several Gypsy-Traveller interviewees mentioned brothers and sisters or sons and daughters now living in England (or other parts of Wales).
- At local authority level, the pattern of current site provision is patchy and several local authorities have no site. As noted above, because so much need stems from

³⁸ This may not apply to New Travellers.

³⁹ *Chapman v United Kingdom* (2001) 33 EHRR 399, para 96

concealed households and family increase on existing sites there is an obvious tendency for current provision patterns to be reinforced by need for permanent accommodation. This conflicts with the 'fair shares' argument often put forward in connection with site provision. Authorities which have made provision are often reluctant to provide more until others have done something. Yet this is precisely not indicated by the need calculations. The same arguments hold for provision of transit or temporary accommodation. While no authority is exempt from unauthorised encampment, there are corridors where the transient Gypsy-Travellers are more likely to want to be.

4.72 While no longer in force, the Caravan Sites Act 1968 is one guide in this area. It referred to Gypsies '*residing in and resorting to*' areas in framing the site provision duty. All the Gypsy-Traveller families implicit in the needs estimate would satisfy this definition. While as noted above, some extended families are widely scattered, many of the Gypsy-Travellers interviewed also had very local links and some relied on or gave support to other family members. On these grounds, their needs should be met where expressed.

4.73 Similar issues arise within local authorities where sites are located in one town or village. Precisely similar 'fair shares' arguments can arise from local communities resisting further provision. It seems appropriate that decisions about meeting site needs 'locally' should be taken in exactly the same way as would be the case for mainstream housing development.

Low Demand for Sites

4.74 An issue arises in Wales which was not identified and addressed in similar work carried out in England, namely low demand for site places. As has been seen, a minority of local authority sites in Wales are over-subscribed and have waiting lists. The majority have no waiting list and some have pitches which are vacant or closed because of lack of demand for them. A number of issues arise here:

- Most simply, this issue must be borne in mind when looking at figures for supply and demand. Obviously vacant pitches in, for example, Gwynedd cannot be seen as meeting needs generated in Cardiff. Less obviously, experience in Pembrokeshire suggests that vacancies in Haverfordwest cannot be seen as meeting needs in Tenby.
- It is important, when considering the appropriate response, to try to determine the reasons for low demand. A number of factors may be involved. Most basically, there may just be too few Gypsy-Travellers who want to live on a site at that geographical location - the site is in the wrong place. Or the site environment may be so bad that any residential use is inappropriate. However, there may be other less fundamental factors - it may be the state of repair or the standard of facilities provided, or it may be that there are family or other social incompatibilities between current residents and potential newcomers. This research is at too general a level to say which explanation applies on any particular low demand site.
- Sites with a number of closed and/or vacant pitches do not generally provide high quality standards for residents. Empty pitches make the site vulnerable to unauthorised invasions and vandalism. As noted in 2.91, sites with vacant or closed pitches have higher average per-pitch-per-year repair costs over the next five years than those without such pitches.

4.75 Investment decisions are needed on low demand sites. As far as possible the local reasons for low demand should be teased out and action determined in the light of what is found. For example, a new management regime and allocation policy might be appropriate as well as investment. The question may arise in future whether to close a site or refurbish it to create fewer, larger pitches and a possibility of extending again if demand picks up. Because of the difficulty of getting approvals for new sites, there are strong grounds for arguing that sites should not be lost unless their locations and/or environments make them truly unacceptable. Rationalisation of pitch numbers is a less irreversible decision, but requires investment to be done properly.

Legal Definitions

4.76 The legal definition of a ‘gypsy’ for planning purposes is currently someone of ‘*nomadic habit of life, whatever their race or origin*’. The courts have been very careful to uphold this definition, to the extent of denying a Gypsy the right to retire from travelling while retaining ‘gypsy’ status. It is clear from this and other research⁴⁰ that many Gypsy-Travellers living on both local authority and private residential sites do not actively travel and there appears to be a general trend towards greater ‘settlement’.

4.77 In England, definitions have been revised in the light of changing circumstances and the requirements of the new planning and housing legislative context. It is proposed that there should be slightly different definitions for planning and housing purposes.

4.78 The ODPM Circular⁴¹ *Planning for Gypsy and Traveller Caravan Sites* says that, for the purposes of the Circular, ‘gypsies and travellers’ means:

‘Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependents’ educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group or travelling show people or circus people travelling together as such.’

4.79 Proposed definitions⁴² for the purposes of sections 225 and 226 of the Housing Act 2004 (duties of local housing authorities towards accommodation needs of Gypsies and Travellers) is wider:

‘Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependents’ educational or health needs or old age have ceased to travel temporarily or permanently, and all other persons with a cultural tradition of nomadism and/or caravan dwelling.’

4.80 Similar revisions will be needed in Wales. Clarity and simplicity suggest that it would be advisable to adopt the same definitions as in England unless there are strong reasons not to.

40 Pat Niner *Local Authority Gypsy/Traveller Sites in England*, ODPM, 2003

41 ODPM Circular 01/2006 *Planning for Gypsy and Traveller Caravan Sites*, February 2006

42 *Definition of the term ‘gypsies and travellers’ for the purposes of the Housing Act 2004 consultation*, ODPM, February 2006

5. CONTRIBUTIONS TO SUPPLY OF GYPSY-TRAVELLER ACCOMMODATION

5.1 The previous chapter made an estimate of need for Gypsy-Traveller accommodation in Wales over the next five years. The current chapter looks at whether current policies and trends are likely to meet those needs. It starts with a description of general policies towards Gypsy-Traveller accommodation to see whether there is a strategic framework in place, nationally and locally, likely to lead to the necessary provision. It then looks in turn at policies on site provision, management of unauthorised encampments, planning and housing, and comments on the adequacy or otherwise of these in meeting the estimated needs. Finally, there is a section identifying perceived obstacles to site provision.

GYPSY-TRAVELLER ACCOMMODATION STRATEGIES AND POLICIES

General Gypsy-Traveller Accommodation Policies

5.2 There is no national strategy or policy on Gypsy-Traveller accommodation - indeed this research is one element in the development of such an approach following the report of the Equality of Opportunity Committee⁴³. Gypsy-Traveller site provision will, to a greater extent than previously, be specifically recognised within housing strategies and Local Development Plans with the implementation of the Housing Act 2004 and the Planning and Compulsory Purchase Act 2004. Guidance to local authorities is being developed on these new responsibilities towards Gypsy-Traveller accommodation.

5.3 At local authority level, the general policy survey showed that there is very little strategic thinking on Gypsy-Traveller accommodation. Only four out of all Welsh authorities said that they have a written policy on Gypsy-Traveller accommodation provision (Blaenau Gwent, Powys, Rhondda Cynon Taf and Swansea). In Powys a Policy on Gypsies and Travellers has been developed jointly by the County Council and Powys Local Health Board; this includes sections on accommodation and unauthorised camping as well as other services. Two authorities (Gwynedd and Newport) are in the process of developing a policy.

5.4 Inclusion of Gypsy-Traveller issues in planning and housing strategies and policies is discussed below. Gypsy-Travellers are specifically referred to in some corporate strategies. For example, survey respondents said that there are specific references in fifteen Race Equality Schemes⁴⁴ and two further authorities plan to make such reference in future. Only two authorities say that they currently refer to Gypsy-Travellers in their Community Strategies and three plan to do so in future revisions.

5.5 Four authorities were unable to identify any section or department having overall responsibility for Gypsy-Traveller accommodation. These were generally authorities with no Gypsy-Traveller site, but three experience relatively high levels of unauthorised encampments. Overall responsibility for Gypsy-Traveller accommodation is most commonly located in housing departments; environmental health, property services and equalities sections/departments were also mentioned. There was no reference in the survey to specialist

⁴³ National Assembly for Wales Equality of Opportunity Committee, *Service Provision for Gypsies and Travellers*, 2003

⁴⁴ Relevant because the courts have established that Gypsies and Irish Travellers are ethnic groups for the purposes of race relations legislation. The Race Relations (Amendment) Act 2000 requires listed public bodies (including local authorities and the police) not only to avoid discrimination, but to be proactive in promoting equality of opportunity and good relations between different ethnic groups.

Gypsy-Traveller sections. Additional sections/departments are also regularly involved with Gypsy-Traveller issues in most authorities, sometimes up to five others.

5.6 The case studies were all in areas with local authority Gypsy-Traveller sites and thus involved authorities which are relatively active on Gypsy-Traveller matters. They illustrate the way in which the different strands of service related to Gypsy-Traveller accommodation are dealt with separately. Thus responsibility for site management, site provision and planning, managing unauthorised encampments and housing Gypsy-Travellers in mainstream housing might all lie in different sections with few apparent links between them to give an overall picture. In Flintshire, an inter-departmental officer working group has been established and is considering accommodation options in a corporate manner.

5.7 These findings suggest that neither at national nor local level is it common to find an overall strategic approach to Gypsy-Traveller accommodation issues. In a minority of local authorities it is hard to see who might take the lead on developing such an approach. In many authorities responsibilities for Gypsy-Traveller accommodation are fragmented between departments and sections so that the overall service requires input from many officers, most of whom spend only a fraction of their time on Gypsy-Traveller matters. In addition to making strategic thinking more difficult, this can also make it hard for members of the public, including Gypsy-Travellers, to know whom to contact in an authority.

Local Authority Site Provision

5.8 Since 1994 there has been no duty on local authorities to make specific provision for Gypsy sites. No local authority site has been opened in Wales since 1997. As reported in para 2.26, four authorities (Conwy, Flintshire, Monmouthshire and Powys) anticipate an increase in the number of sites in the next five years and two (Blaenau Gwent and Cardiff) anticipate increases in the number of pitches at existing sites. Of these proposals, plans to refurbish and extend by three to six pitches the Rover Way site in Cardiff are furthest advanced. It would not seem safe to rely on other proposals as firm contributions to meeting estimated site need.

5.9 Vacancies occurring on existing sites will contribute to meeting needs and must be taken into the calculations. Fourteen residential pitches were vacant across Wales at the time of the site provision and management survey although it is not clear that all were in a condition to be immediately relet (para 2.18). Although the figures are not complete it is likely that between 20 and 25 residential pitches were vacated in the year 2004/5 (para 3.38). If this rate of vacancies were to continue over the next five years, 100-125 residential pitches would become vacant. This would appear to contribute significantly towards the 150-200 residential pitches estimated to be needed over the next five years, especially taking into account existing vacant pitches as well. However, only six residential pitches are known to have become vacant on the eight sites with a waiting list, giving a total of only 30 pitches over five years (and no current vacant pitches) in the areas where need is concentrated.

Managing Unauthorised Camping

5.10 At present, in the absence of a network of transit sites or authorised stopping places, the main element of 'supply' of transient accommodation is unauthorised encampment. How local authorities, the police and other landowners manage encampments thus affects the nature of this 'supply'.

5.11 In January 2005 Welsh Assembly Government and the Home Office published *Guidance on Managing Unauthorised Camping*. This advocates developing a strategy for unauthorised camping and stresses the importance of considering site provision as part of that strategy. The guidance notes the need to make welfare enquiries before deciding to evict and seeking to meet any welfare needs identified in enquiries. While recognising that there are some locations where unauthorised encampment will be unacceptable, the guidance also illustrates ways in which encampments might be actively managed for a period so as to minimise disruption for both the settled community and the Gypsy-Travellers involved. These include developing codes of acceptable behaviour and seeking to tackle anti-social behaviour or fly-tipping by taking action against the perpetrators rather than evicting the whole group. Throughout the guidance the importance of inter-agency working is stressed, particularly between local authorities (all relevant services), the police and health bodies. Consultation on strategies including with Gypsy-Travellers, local businesses and the settled community is advocated to achieve maximum commitment.

5.12 This research was not intended to look in detail at how unauthorised camping is managed in Wales but it did collect some relevant information through the general policy survey of local authorities, consultation and interviews with representatives of each of the four Welsh Police Forces, and written consultation with some major statutory landowners. The main findings are presented below with some concluding comments.

Local Authorities and Unauthorised Encampment

5.13 Chapter 4 (Table 4.1) noted the incidence of unauthorised encampments as reported by 21 local authorities. It found that unauthorised encampments can occur anywhere, but are more common in areas in North and South Wales and around Aberystwyth.

5.14 Authorities were asked, in the general policy survey, which of a series of **actions and legal powers** had been used in respect of unauthorised encampments over the past three years in their area. Only Vale of Glamorgan said that there had been no encampment over this period. In order of frequency of mention, actions are as follows:

LA negotiated departure date with Gypsy-Travellers	15 LAs
LA court action commenced - civil action for trespass	10 LAs
LA court action other than civil action for trespass or use of Criminal Justice & Public Order Act (CJPOA)	7 LAs
Police negotiated departure with Gypsy-Travellers	4 LAs
LA court action commenced - CJPOA ss77/78	3 LAs
Common law with eviction by bailiffs	1 LA
No particular action taken	3 LA
Police used CJPOA s61	Nil

5.15 As can be seen, negotiation to agree a departure date with Gypsy-Travellers is the most commonly used response. This is used by most authorities, even if more specific legal powers are also used on occasion. It is clear that authorities are more likely to use civil powers for trespass or other powers (eg under the Highways Acts) than the Criminal Justice & Public Order Act (CJPOA) ss77/78 specifically designed for action against unauthorised encampments. Fifteen authorities altogether had used civil or other powers, while only three (Carmarthenshire, Pembrokeshire and Torfaen) had used the CJPOA. One authority had used common law eviction with bailiffs; the guidance advises local authorities to avoid eviction

measures which do not require a court order. Another feature of the list is the relatively small role apparently played by the police. It is striking that CJPOA s61 police powers against unauthorised campers had not been used anywhere over the past three years.

5.16 In seeking to establish the **costs of managing unauthorised encampment**, authorities were also asked how much their authority spent on managing unauthorised encampments in the year 2004/5. Very few were able to provide any information. Two authorities (Bridgend and Vale of Glamorgan) specifically said they spent nothing in the year. Some others left blanks, but it is not clear whether this represents a zero or an unknown. Only Caerphilly was able to give a sum - £1,000 comprising £400 in staff time and £600 in other costs for portable toilets and skips. Other authorities providing partial information were:

Gwynedd:	£11,185 for legal staff and £900 court costs
Powys:	approximately £5,000, 150 man-hours; clean-up costs £6,000
Torfaen:	5 days staff costs + £300 for court costs
Wrexham:	staff time for visiting sites only (no estimate)

5.17 In the light of this lack of information it is impossible to estimate the approximate cost of dealing with unauthorised encampments to put into an equation against the cost of any form of transit accommodation. The lack of information suggests that authorities are also unable to plan on the basis of cost evidence as advocated in a Best Value approach⁴⁵.

5.18 As noted above, the guidance on managing unauthorised encampments stresses the importance of **inter-agency working**. Authorities were asked whether they had any agreed arrangements for joint working with other agencies on managing encampments. Three-fifths of authorities (fourteen) said that they did not have any such arrangements; this included authorities which had experienced three to six encampments in the past three months as well as some with lesser experience. One specifically said that they were reviewing arrangements at the time of the survey. The authorities experiencing seven encampments and over in the past three months all had some form of agreed arrangement. Joint agreements or protocols with police were most frequently mentioned. Nine authorities said that they did not regularly share information on unauthorised encampments with other agencies; nine, including those with the most frequent recent encampments, share information with the police; four share information with other authorities.

5.19 These answers suggest that there is still scope for further development of working arrangements on managing unauthorised encampments between agencies in many areas.

5.20 The case studies explored approaches to managing unauthorised encampment. The four areas varied in the frequency of unauthorised encampments experienced and included Flintshire, one of the hot spots identified in Chapter 4. In Flintshire, some Gypsy-Travellers involved in unauthorised encampments are working in the area; some come regularly to visit St Winifred's Well at Holywell. Unauthorised encampment is seen locally as a major issue of some political import. Many encampments are said to leave behind mess and rubbish which is costly to clear. Local industrialists and members of the public are said to complain as soon as an encampment is established. Reaction is speedy and eviction action taken as quickly as possible using civil powers. Recently, for the first time in many years, some Gypsy-Travellers appeared at the County Court for the possession hearing and the authority is fearful that

45 Rachel Morris & Luke Clements, *At What Cost? The economics of Gypsy and Traveller encampments*, Policy Press, 2002

Gypsy-Travellers may increasingly challenge evictions in court. This is one reason behind the establishment of the inter-departmental officer working group. Officers recognise that some form of authorised transit accommodation may be needed.

5.21 Unauthorised encampments were rarer and had a lower profile in the other case study areas. Approaches seemed rather more relaxed. For example, there is no formal policy towards unauthorised encampments in Cardiff. Following the introduction of the Criminal Justice and Public Order Act in 1994 and the *Wealden* case⁴⁶, there was an attempt to get a policy agreed with all relevant agencies. However, as the number and size of encampments tailed off significantly, parties lost interest. The Gypsy Liaison Officer visits encampments and informally discusses their reasons for being in the area, expected length of stay and so on. The groups are usually small and the Gypsy-Travellers usually well known. This is the only 'action' normally needed. Some small encampments are 'tolerated' for a period.

5.22 In Pembrokeshire a process has been started to develop a protocol agreed between the County Council, the police and the Pembrokeshire Coast National Park Authority (whose land is sometimes encamped). Progress appears to have been fairly slow. A local authority officer now has responsibility for making welfare enquiries, through a self-completion questionnaire form. Decisions on action are taken by land-owning departments and agencies. There appears to be a 'grey area' in some rural parts of Pembrokeshire where New Travellers stop on farmers' land with their agreement but without planning permission. Such 'encampments' may remain for some time. The scale of unauthorised encampment experienced in the county was not felt to be sufficient to warrant provision of formal transit accommodation, and this was not seen as a priority.

5.23 Generally then, it seems that local authority policies towards managing unauthorised encampments are often not very formally developed. There are obvious differences in perception of the seriousness of the issue related to the frequency with which encampments occur. In areas where the incidence of unauthorised camping is low, there is little recognition of need for more formal policies or provision. In areas where incidence is higher, action to move Gypsy-Travellers on may be taken more rapidly. There may be a greater acceptance of the need for more formal policies and provision, but direct experience of problematic encampments paradoxically makes site provision even less acceptable to politicians and the settled community.

The Police and Unauthorised Encampment

5.24 All four Police Forces in Wales are currently considering and developing their approaches to Gypsy-Travellers and unauthorised encampment. They are hoping to involve local authorities in their discussions and in some areas seem to be taking the lead, somewhat reluctantly, in policy development. Police are generally very aware of their equalities and diversity and human rights responsibilities and it is in this context that approaches are being developed.

5.25 Three themes came out of consultations with police which explain the apparent low profile of police action reported above:

46 R v Lincolnshire CC ex parte Atkinson; Wealden DC ex parte Wales and Stratford [1995] 8 Admin LR 529

- There is a feeling that police are sometimes being pressed to take on inappropriate roles. Their main concerns are with crime and disorder, not necessarily with trespass per se. The fundamental issue is lack of accommodation - not a police responsibility - and it is therefore appropriate for local authorities to take the lead.
- Perhaps because they cover wider geographical areas than local authorities, there is a clear recognition that moving people on solves nothing: *'if you serve a notice, they don't just disappear into the ether'*.
- Police are always wary of taking action which could lead to people becoming homeless. Homelessness is the logical extension of using police powers under s61 of the Criminal Justice and Public Order Act if people refuse to move on in response to a police direction.

5.26 One police officer interviewed was of the opinion that provision of short-stay pitches and placing greater responsibility on Gypsy-Traveller families to behave in ways which do not have a disproportionate impact on others was a way of tackling the basic problem rather than tackling the symptoms through repeated evictions.

Public Landowners

5.27 Unauthorised encampments over recent years reported by some public landowners were noted in para 4.30 above. The consultation explored policies and procedures adopted towards encampments; it is clear that not all public bodies follow guidance on the need to carry out welfare enquiries before deciding to evict. Most respondents said that they would use/have used court orders where Gypsy-Travellers do not leave of their own accord after a short period. The exceptions were the North Wales Division of the Welsh Development Agency who reported changing from use of court orders to employing consultants who use bailiffs to make common law evictions. The main advantage of this is speed - two to three days compared with several weeks - and consequent advantages in relations with the business community. The costs of each approach were said to be the same at about £2-3,000 a case. While Dwr Cymru Welsh Water have had no recent experience of encampments in Wales, it is likely that bailiffs would be used following practice in the North West of England. The Forestry Commission consultee commented that speed of action reflected the nature and impact of the encampment; some tucked-away and unproblematic encampments might be allowed to stay for several months. He also commented that the Gypsy-Travellers involved tended to be very well aware of their rights and that proper procedures had to be followed to avoid successful challenges. He noted a recent court case (*Drury v Secretary of State for Environment, Food and Rural Affairs*, 2004) which would affect their previously normal practice of seeking an order covering a 20 mile radius of the actual encampment to avoid trespassers moving a short distance to another piece of land.

5.28 Welsh Assembly Government was able to provide figures for the costs of dealing with three encampments on highway land. These varied with the nature of the encampment and whether a court appearance was needed. Costs varied from just over £300 to £18,142 including legal costs, clean-up costs and boulders to make neighbouring land secure. The total across the three encampments was about £24,600 excluding Welsh Assembly Government staff time for which no estimate is made.

Comments on Managing Unauthorised Encampment

5.29 A continuation of current policies on unauthorised encampment seems generally unsatisfactory in that, in some places, encampments will continue to cause disruption to landowners, businesses and the settled community. Equally, unauthorised encampments provide very poor living conditions for the Gypsy-Travellers involved and the speed of eviction action makes it hard to get children into schools or to access other services. However, there is little evidence of proposals to provide formal or informal authorised transit provision unless suggested by reviews currently underway in Gwynedd, Flintshire and Newport. It seems safe to say that current policies will 'cope' in a similar way as now, but will not contribute to meeting the authorised accommodation need estimated in Chapter 4.

Planning

5.30 The use of land as a Gypsy-Traveller caravan site requires planning permission whether it is developed by the local authority or a private individual. The development plan framework in Wales is now set by Part 6 of the Planning and Compulsory Purchase Act 2004 which introduces a statutory requirement for a Local Development Plan (LDP) for each local planning authority area which will replace the requirement for Unitary Development Plans (UDPs). *Local Development Plans Wales* (2005) provides policy guidance on the new system. This guidance requires the production by each local planning authority of a Community Involvement Scheme as part of the LDP process. This must show how the local planning authority will consult Gypsy-Travellers about site provision. Transitional arrangements will allow authorities to continue work on taking UDPs to adoption before starting on LDPs. In preparing their LDPs, each local planning authority must have regard to the Wales Spatial Plan which the National Assembly for Wales has a statutory duty to prepare. The Wales Spatial Plan is not a statutory development plan but it must set out the Assembly's policies in relation to development and use of land in Wales. Welsh Assembly Government expect local authorities to co-operate regionally and sub-regionally when considering site provision.

5.31 The current guidance to local authorities on planning for Gypsy-Traveller accommodation is set out in Welsh Office Circular 2/94 (*Gypsy Sites and Planning*) which drew attention to the requirement for local planning authorities to assess needs for Gypsy sites and, wherever possible, to identify specific locations for site development in development plans. The circular also urged authorities to consult Gypsies and to assist them in making planning applications for sites. This circular reflected the intended shift from public to private emphasis in site provision following the repeal of the site provision duty in 1994.

5.32 More recent guidance was issued in the March 2002 *Planning Policy for Wales*. Paragraph 9.2.17 in the Housing section reads:

'Local authorities must indicate the regard they have had to meeting the accommodation needs of gypsy families. It is important that the local planning authorities have policies for the provision of gypsy sites in their UDPs. In drawing up policies local planning authorities should consult with providers of social housing, representatives of gypsies and travellers and landowners in areas likely to be suitable for gypsy sites.'

5.33 There are references to Gypsy-Traveller accommodation in the Planning Consultation Pack issued by Welsh Assembly Government in July 2005. The *Draft Ministerial Interim Planning Policy Statement* in paragraph 9.2.20 effectively re-states the guidance given in *Planning Policy for Wales* quoted above. TAN2 *Planning and Affordable Housing* (para 7.2) refers to the need for local authorities to assess the particular accommodation needs of specific groups, including Gypsies and Travellers, when making Local Housing Assessments to establish the nature and level of housing requirements in their local housing markets. Draft guidance on the approach to needs assessment has been issued for consultation; Annex E deals with Gypsies and Travellers. In England, ODPM Circular *Planning for Gypsy and Traveller Caravan Sites* has been issued along with consultation on definitions of the term 'gypsies and travellers' for the purposes of the Housing Act 2004 and draft practice guidance on Gypsy and Traveller Accommodation Assessments. A similar suite of guidance will be required in Wales.

5.34 At local level in Wales, development plans are at various stages of completion. Some UDPs have been adopted and are statutory development plans for the area. Some authorities are sufficiently advanced in the UDP process to complete it before producing their first LDP; others will move direct to producing an LDP. Where there is no adopted UDP, the statutory development plan comprises a variety of structure and local plans, many of which are long out of date.

5.35 In order to gauge the local planning context for Gypsy-Traveller site provision, the general policy survey asked about UDP policies and an internet survey was carried out. The former was not very successful, but suggested that the majority of authorities do have some policy on Gypsy-Traveller sites in their plans.

5.36 The internet search examined the most recent version of the adopted or emerging UDPs in twenty local authorities and the three National Park Authorities. All had some form of policy on Gypsy-Traveller sites. The main characteristics are:

- None of the plans examined identify any locations for development as a Gypsy site which are not currently in such use. Several justify this with comments to the effect that no outstanding need has been identified for sites, but that the situation will be monitored during the plan period.
- The great majority of policies are criteria-based - that is they identify criteria against which any application for a Gypsy site would be assessed.
- The number of criteria vary widely from three (Blaenau Gwent UDP Deposit Written Statement H12, Isle of Anglesey Deposit UDP November 2001 HP13) to thirteen (Carmarthenshire Deposit Draft UDP November 2002 H15).
- Most of the criteria used relate to amenity, impact on neighbouring uses, access, infrastructure and services. Criteria are worded slightly differently in different plans. Table 5.1 overleaf shows Carmarthenshire's list of criteria (as the most comprehensive single list) with comments as to the relative frequency with which each criterion is included elsewhere. The table also shows other criteria adopted by authorities.
- Criteria appear to be more or less easy to meet. The most obvious difficulties might lie in the requirement for a development to be in an area frequented by Gypsies if there is no previous pattern of settlement. There are some potential conflicts between criteria in a single policy - for example Swansea's policy requires access

to shops and other basic amenities within 1 mile, no proximity to development giving rise to conditions unacceptable for housing, and avoidance where possible of substantial residential development (not within a quarter of a mile).

- In Blaenau Gwent and Monmouthshire the policy only applies to development of transit sites and temporary stopping places; there appears to be no policy for residential sites. In Cardiff the policy applies to all caravan sites.

5.37 Three of the policies examined were not specifically criteria-based:

- Gwynedd UDP Deposit Draft Policy CH14 states that *'Proposals for gypsy sites in the Plan area will be approved provided there is evidence of genuine need for the development'*. However the text explains that proposals will be assessed against various impact considerations similar to those normally included in a criteria-based approach.
- Newport Proposed Changes to the 1999 Deposit Plan states that *'Proposals for Gypsy Sites should be considered in the same way as proposals for other forms of caravan sites, which essentially need to meet the same requirements as for other types of residential accommodation.'*
- Wrexham's UDP adopted February 2005 Policy H9 states *'In exceptional circumstances, where sites for caravans for individual gypsy families cannot be accommodated within settlement limits, consideration will be given to other proposals, subject to compliance with Policy GDP1.'* Policy GDP1 sets out criteria to ensure development will be safe, compatible, sustainable etc.

In practice there may not be that much difference between these and the more usual criteria-based policies.

5.38 Some policies seem ambivalent as to whether Gypsy sites are or are not to be treated as 'residential' development. Overall, other things being equal, it should be possible to find sites which meet most criteria depending on how the various references to 'amenity' are treated. However, none of the policies is pro-active in the sense of positively identifying land for Gypsy-Traveller sites in the way required by Circular ODPM 01/2006 in England⁴⁷: *'Local authorities must allocate sufficient sites for gypsies and travellers, in terms of the number of pitches required by the Regional Spatial Strategy, in site allocations in Development Plan Documents'* (para 32). The current local planning policy framework in Wales may not completely prevent site provision, but it does not encourage it. While we have no firm statistics, the impression from stakeholder interviews, Project Advisory Group comments and information on planning appeals suggest that planning authorities are reluctant to grant planning permission to Gypsy-Travellers for site development - suggesting that overall the system is in practice negative.

47 ODPM Circular 01/2006 *Planning for Gypsy and Traveller Caravan Sites*, February 2006

Table 5.1: Criteria Used in Unitary Development Plans from Internet

Criteria from Carmarthenshire Policy H15	Relative frequency of inclusion
Development pays due regard to its surroundings in terms of scale, siting, design and materials	Included in most policies in some form
Development does not have an unacceptable adverse visual impact on the street scene or landscape	Included in most policies in some form
Development does not have an unacceptable adverse effect on nature conservation interest	In a minority of policies
Development pays due regard to the amenity of adjoining properties where appropriate	Included in most policies in some form
Provision is made for satisfactory access and off-street car parking in accordance with the Council's parking standards	Vehicular access requirements in most policies; parking much less commonly included
Development pays due regard to the existing public rights of way network	In a small minority of policies
Required infrastructure is available or is capable of being provided to serve the proposed development	Included in most policies in some form
Development in conservation areas respect the character and setting of these areas	Not in other policies in this precise form
Development does not result in the loss of land which the LPA considers essential to safeguard for other uses	In a minority, sometimes specific reference to high quality agricultural land
The site can be clearly defined and is capable of further reinforcement at its boundary to prevent encroachment onto adjoining land	In a minority of policies
The site is adequately screened or capable of being adequately screened	In about half policies
The site is located in an area normally frequented by Gypsies	In three other policies
The site is located within a reasonable distance of schools, shops, medical and other community facilities	Included in most policies in some form
Additional criteria included in other policies	
Demonstrable need for the development - <i>in a minority of policies or accompanying text</i>	
Sites should ensure there are adequate facilities and space for the storage of implements, machinery and other objects associated with the business activities of Gypsies - <i>in a small number of policies</i>	
New buildings will only be permitted in exceptional circumstances where they are required for ancillary services which are both non-residential and essential, and where they cannot be accommodated through conversion or rehabilitation of other buildings on the site - <i>in two policies</i>	
Site avoids close proximity to residential development - <i>in two policies</i>	
The proposal would meet the needs of persons meeting the definition of gypsies set out in the Criminal Justice and Public Order Act 1994 who have regularly resided in or resorted to the area and there are no other sites available locally - <i>in one policy; another policy refers to availability of other sites</i>	
Sites should not be located in proximity to development giving rise to conditions which would prove unacceptable for housing - <i>in one policy</i>	
Specific excluded areas, eg must be within defined urban area (one policy) or outside AONB (one policy)	

Housing and Homelessness

5.39 Until recently there were few specific references to Gypsy-Travellers in housing or homelessness legislation or guidance. This has changed with the Housing Act 2004. Section 225 (which will apply in Wales) places a duty on local housing authorities to include the accommodation needs of Gypsies and Travellers residing in or resorting to their district when undertaking a review of housing needs in their district. Any needs identified must be included within their housing strategy. As noted above, the Welsh Assembly Government is consulting on needs assessment methods. If authorities fail to comply with the new requirements set by the 2004 Housing and Planning and Compensation Acts, the courts may take the view that unauthorised encampments which are not causing severe nuisance or annoyance should be kept in place⁴⁸.

5.40 The current national housing strategy⁴⁹ makes no reference to Gypsy-Travellers. The recently issued national homelessness strategy⁵⁰ refers to Gypsy-Travellers, committing to 'review the housing needs and service provision for gypsies and travellers in Wales' by December 2006. The strategy expects local authorities to 'include the provision of services to Gypsies and Travellers as part of their local housing strategies'. Reference is also made in the *Code of Guidance for Local Authorities on Allocation of Accommodation and Homelessness* (April 2003). This reminds authorities that people are homeless if they live in a caravan or other moveable structure but have nowhere they can legally place and live in it. On this definition, any Gypsy-Travellers on unauthorised encampments without a legal base would be homeless. A contentious issue is what constitutes 'suitable' accommodation to offer such homeless people. Paragraph 18.40 of the Guidance reads:

'Under s175(2) applicants are homeless if their accommodation is a caravan, houseboat, or other moveable structure, designed or adapted for human habitation, and they do not have a place where they are entitled, or permitted, to put it and live in it. If a duty to secure accommodation arises in such cases, the housing authority are not required to make equivalent accommodation available (or provide a site or berth for the applicant's own accommodation), but they should consider whether such options are reasonably available, particularly where this would provide the most suitable solution to the applicants accommodation needs. These circumstances will be particularly relevant in the case of gypsies and travellers, whose applications must be considered on the same basis as all other applicants. If no pitch or berth is available to enable them to resume occupation of their moveable home, it is open to the housing authority to discharge its homelessness obligations by arranging for some other form of suitable accommodation to be made available.'

5.41 The courts have considered cases concerning suitability of offers in relation to Gypsy-Travellers with a strong aversion to bricks and mortar accommodation⁵¹. If a local authority is satisfied that a Gypsy-Traveller applicant has a sufficient degree of cultural aversion to conventional housing, they should use their best endeavours to see if an authorised pitch can be located.

⁴⁸ See *West Glamorgan CC v Rafferty* [1987] 1 WLR 457, a case involving failure to comply with the previous provision duty under the Caravan Sites Act 1968

⁴⁹ National Assembly for Wales, *Better Homes for People in Wales : A National Housing Strategy for Wales*, 2001

⁵⁰ Welsh Assembly Government, *National Homelessness Strategy for Wales 2006-2008*, November 2005

⁵¹ See *R (Margaret Price) v Carmarthenshire CC* [2003] EWHC 42 Admin and *Codona v Mid-Bedfordshire DC* [2004] EWCA Civ 925

Local Housing and Homelessness Policies

- 5.42** An internet search of local housing strategies, homelessness strategies and black and minority ethnic housing strategies was undertaken. Documents could not be found for all 22 housing authorities in Wales. Although not fully comprehensive, the findings may be seen as indicative of the type of reference currently made to Gypsy-Travellers in housing strategies and plans.
- 5.43** Seven authorities apparently make no mention of Gypsy-Travellers in any of the documents found. This means that about two-thirds of authorities do refer to Gypsy-Travellers in one or more of their housing documents.
- 5.44** In seven authorities, the documents scanned acknowledged the presence of Gypsy-Travellers but apparently included no specific policy or action point beyond (sometimes) a recognition of the need to get more information on the community and/or to consider its needs in future and/or to ensure its greater involvement in future.
- 5.45** In eight authorities there was more specific reference, and policies and/or action points were included. Table 5.2 (overleaf) provides extracts and paraphrases to illustrate the sort of coverage. As can be seen, needs assessment is again a common theme, as is improvement of current site accommodation. A small number refer to allocation policies as they impact on Gypsy-Travellers. Only one refers explicitly to unauthorised camping.
- 5.46** The case studies found that Gypsy-Travellers receive no special treatment in social housing allocation policies. All reported considerable pressure on available vacancies from waiting list and homeless applicants. The level of need experienced by Gypsy-Travellers seems to mean that they receive relatively high priority. Their sometimes large family size means that they have to wait for large houses which are in short supply. Some Gypsy-Traveller applicants 'disappear' before an offer is made, but may turn up again at a later date. Keeping in touch, and corresponding solely by letter can be problematic.

Table 5.2: References to Gypsy-Travellers in Housing Documents from Internet

<p>Cardiff: The Draft Ethnic Minority Housing Strategy 2004-2009 includes specific proposals:</p> <ul style="list-style-type: none">▪ To carry out works identified at the existing sites▪ To work with cross-boundary authorities to carry out research to identify demand for further sites▪ To review allocation policies to ensure they do not discriminate against Gypsy-Traveller households
<p>Carmarthenshire: The Local Homelessness Strategy 2004-2009 includes specific actions:</p> <ul style="list-style-type: none">▪ Develop MBE Housing Strategy and Action Plan to assess future housing need. Travellers will be included in this assessment.▪ Linking in with development of BME Strategy, produce Travellers Policy incorporating:<ul style="list-style-type: none">- Deposit bond scheme- Traveller Liaison Group- Temporary short stay stopping places- Protocols between agencies- Expert advice on Traveller issues
<p>Conwy: The Local Housing Strategy 2004-2009 includes as a Challenge: <i>'Conwy cannot offer Gypsies and Travellers appropriate accommodation facilities in order to discharge their statutory homelessness duties'</i>. The proposed Solution is to develop a Gypsy/Traveller housing policy and this is included in the Action Plan.</p>
<p>Newport: The Housing Strategy 2004-2009, update 05-06 sets out a proposal to work with neighbouring authorities in South Wales, through the South East Wales Regional Housing Forum, to assess the accommodation needs of Gypsy-Travellers in the area. The needs assessment will inform a strategic, cross-boundary approach to planning of appropriate services in consultation with community representatives.</p>
<p>Pembrokeshire: The Local Housing Strategy April 2004 refers to current sites, vacancies and waiting lists and to the ongoing improvement programme. No further provision is planned. It also refers to access to housing through Housing Register when this becomes a particular requirement.</p>
<p>Rhondda Cynon Taf: The Black and Minority Ethnic Housing Strategy 2004-2007 includes three short term actions:</p> <ul style="list-style-type: none">▪ To carry out research to identify demand for sites▪ To review allocation policies to ensure that they are in line with section 175(2) of the Housing Act 1996 and do not discriminate against Gypsy and Traveller communities▪ To ensure that the authority adheres to its duties under the Children Act and homelessness legislation and assesses the circumstances of families before taking enforcement action against unauthorised encampments
<p>Swansea: The Black and Minority Ethnic Housing Strategy and Action Plan refers to the local Gypsy-Traveller population and site, and to a current Best Value Review of the site which is looking at likely future demand and site capacity + options on site ownership and management. An action point is to implement findings of Review.</p>
<p>Wrexham: The Local Housing Strategy 2004-2009 states <i>'The particular needs of traveller families are recognised by Wrexham County Borough Council'</i> and refers to the site which includes amenities and facilities for transient visitors as well as residential pitches. Any modification of the site is undertaken in consultation with resident families. Travellers can apply on the open waiting list. Cymdeithas Tai Clwyd has implemented a housing support scheme for travellers in Wrexham funded by SPRG. A priority for action is to <i>'Continue to provide a permanent traveller site and consult with travellers over improvements.'</i></p>

5.47 Some case study interviewees said that there was sometimes resistance from neighbours to Gypsy-Travellers being housed in their area. Some incidents of harassment and neighbour problems arise, with occasional lifestyle issues over visitors to Gypsy-Travellers with caravans and lorries or dogs - '*nothing too serious*' as one interviewee put it. However, several interviewees commented that Gypsy-Traveller tenancies did not always last very long. One officer said that some moved to a house just to try it and might '*drift in and out*'. None of the case study authorities provided any special support to help Gypsy-Travellers make the transition to housing.

5.48 The caseload of the Cardiff Gypsy and Traveller Project shows that registered social landlords (RSLs) are important in offering housing opportunities for Gypsy-Travellers. This was also shown from the number of housed Gypsy-Travellers interviewed who were living in RSL homes.

5.49 As noted in para 4.53, some of the Gypsy-Traveller interviewees had experienced hostility from neighbours on being housed. One felt that he had been tricked into accepting a smaller flat than he needed on the (mistaken) understanding that it was temporary. He acknowledged that he had acted in an aggressive manner with a housing officer due to his difficulty in understanding procedures. Another interviewee in a different area had learnt from a neighbour that a housing officer had told her (the neighbour) that she would be living next door to a Gypsy and asked her what she knew about Gypsies. She (the interviewee) felt this was quite wrong and likely to set up prejudice.

The Contribution of Social Housing to Meeting Needs

5.50 Not all local authorities were able, in the general policy survey, to give an estimate of how many Gypsy-Travellers had been housed in social rented housing over the last three years. Thirteen authorities were able to make some estimate. The average worked out at just under two Gypsy-Traveller allocations a year per authority. Applying this figure to all authorities would give an annual total for Wales of around 45 allocations. Over a five year period this gives 225 allocations.

Contributions to Supply of Gypsy-Traveller Accommodation

5.51 What does this policy background suggest for the likelihood that estimated needs for Gypsy-Traveller accommodation will be met? Estimated needs are:

- 150-200 residential pitches on local authority sites
- 50-100 families housed in bricks and mortar housing
- 50 residential pitches developed on private, family sites
- 100-150 places to accommodate temporary stays while travelling

5.52 Our main conclusions from the analysis presented above are:

- There is no need for any additional special policies or procedures to increase the number of social housing allocations made to Gypsy-Travellers above the levels attained in the recent past through mainstream processes. However, sensitive allocations and some greater tenancy support might increase the duration of some tenancies.

- While the supply of residential pitch vacancies on past trends would contribute significantly to meeting the estimated need, most of these vacancies are likely to arise in the wrong places. There is still a need for 100-150 additional pitches to cater for needs generated on the most over-subscribed sites.
- There is nothing in current planning or housing strategies and policies to suggest that they would deliver the additional residential pitches required without some encouragement.
- Similarly, there is little to suggest provision of authorised short-stay places would be achieved.

PERCEIVED OBSTACLES TO SITE PROVISION

5.53 Having reached rather pessimistic conclusions about the likelihood of further provision of Gypsy-Traveller sites through current policies, it is worth looking in a little more detail at some of the main obstacles to site provision. The section starts with local authority perceptions of obstacles as given in the general policy survey. The next sub-section reports briefly on perceptions of anti-Gypsy-Travellers discrimination expressed in Gypsy-Traveller interviews and the last shows the findings of a written consultation carried out with Town and Community Councils and other local bodies in areas with existing local authority Gypsy-Traveller sites.

Local Authority Views

5.54 Authorities were asked to indicate the main perceived obstacles to providing further local authority sites for Gypsy-Travellers by ticking answers from a given list. In order of frequency of mention, perceived obstacles are:

Resistance from local residents	18 authorities
Funding for new sites	15 authorities
Problems getting planning consent	12 authorities
Inadequate commitment locally	10 authorities
Lack of suitable land for sites	10 authorities
Lack of funding for running costs	9 authorities
Lack of a duty	8 authorities
Lack of need for sites	7 authorities
Inadequate government commitment	7 authorities
No suitable housing associations	2 authorities
Other	3 authorities

5.55 Resistance from local residents and the indirectly linked problems of getting planning consent and lack of suitable land are obviously very important. Funding - both capital and running costs - is also important. A significant minority identified the lack of need for sites as the main obstacle.

5.56 These perceived obstacles are very familiar. The top three were also the top three identified in similar research in England⁵². As the English report pointed out, there is also little change from the obstacles identified by Sir John Cripps back in 1977 who said⁵³: *'it must be accepted that almost any proposal for a site will arouse strong local opposition during the period leading up to a decision'* and linked this with local politicians' fear of losing votes by not opposing site proposals.

5.57 When asked in our survey how the obstacles they identified could best be overcome, some authorities made comments which further explained their identified obstacles, for example:

No need to overcome because no need for further provision.

Boundaries with four other LAs all of which provide permanent sites for Gypsy-Travellers.

The huge problems facing authorities regarding homelessness has meant that work is focused on that area at present - with stretched resources the focus is unlikely to fall on Gypsy-Travellers. It is also very difficult to obtain community support for such provision, which means the issue has little chance to rise up the agenda.

5.58 Some suggestions were made for overcoming obstacles. The common themes were:

- A mandatory duty to provide sites which might help overcome community resistance.
- Leadership and guidance from the Welsh Assembly Government.
- A better system of funding specific to sites.
- Liaison with local communities, education and awareness campaigns about the issue with local members and residents.

5.59 One comment in particular highlights the need to start with fundamentals if barriers to local authority or private sites are to be overcome:

Awareness of Gypsies and Travellers as an acknowledged section of society, as recognised under the law, with a contribution to make to all localities. A dispersal of the mistrust travellers have toward the authorities and vice versa - achieved via awareness raising and education.

Another comment places responsibility in this area upon the Welsh Assembly Government:

There needs to be a real drive by the WAG to raise the profile and improve the media coverage on Gypsies and Travellers to improve the acceptance and understanding of them from local residents.

Gypsy-Traveller Perceptions of Discrimination

5.60 NIMBY sentiments are frequently expressed in connection with almost any development. A scan of the treatment of Gypsy-Traveller issues by British national newspapers over the past year shows that most coverage is negative to Gypsy-Travellers. Unauthorised

⁵² Pat Niner, *Local Authority Gypsy-Traveller Sites in England*, ODPM, 2003

⁵³ Sir John Cripps, *Accommodation for Gypsies: A Report on the workings of the Caravan Sites Act 1968*, HMSO, 1977, page 12

development of sites in various parts of England has been featured by several tabloids. One theme in the coverage is resentment at the 'flouting' of planning controls and near hysteria that the Human Rights Act allows Gypsy-Travellers to 'get away with' things that settled communities could not do. Articles also show that nearby residents fear noise, nuisance and crime from the site; homeowners fear that the value of their homes will be reduced. In Wales, unauthorised development has not appeared in the local press, but coverage has been equally negative, dealing mainly with unauthorised encampments and stressing mess and nuisance created and the costs to the settled community of cleaning up. Such press attention reinforces generally adverse public perceptions of Gypsy-Travellers⁵⁴ which lead to extra-strong NIMBY feelings as soon as a possible site location is mentioned.

5.61 Gypsy-Travellers interviewed were very aware of anti-Gypsy-Traveller feelings and discrimination. While this was not a researcher priority area in the interviews, it was often the topic on which people had most to say and the strongest feelings were expressed. Several personal accounts were given of being followed around in shops, banned from pubs or being subjected to what was seen as harassment by police. Three themes were stressed:

- No-one is interested in Gypsy-Travellers and their problems: *'because you're a Gypsy, no-one wants to know'; 'they've got no time for you'; 'the government doesn't listen to Travellers'; 'no-one really listens to Travellers'*. There was little faith that things would really change for the better, on accommodation or anything else.
- 'House-dwellers' treat all Gypsy-Travellers the same - they lump together the trouble-making minority and everyone else so that all Gypsy-Travellers suffer for the behaviour of a few individuals: *'we're all tarred with the same brush'; 'if one gets banned from a pub, we're all banned'*. In this way site residents suffer from adverse public reactions to transient Gypsy-Travellers who sometimes cause damage and leave behind trade rubbish (which may be added to by members of the settled community taking the opportunity for a little fly-tipping for which the Gypsy-Travellers will be blamed).
- Gypsy-Travellers see themselves as the group in the population against whom it is 'acceptable' to make racist remarks.

5.62 There were differences of perception as to whether site residents were more accepted and less subject to discrimination in the locality of the site, and this seems to vary between areas. However, several people said that things were usually fine when they were known, either personally or to come from the site. Residents of one site in Pembrokeshire were campaigning along with other residents to retain the village school. An interviewee noted the tensions that there had been with some residents:

'Some who don't know us - thinks they're better than everybody else - we put a big piece in the paper [local newspaper] - us and the Gaujes saying "it's not - Us and Theme - it's ALL of us."

5.63 Findings from the interviews show that discrimination is still rife, and still to be tackled in order to reduce barriers to site provision. They suggest that tackling unauthorised encampments and reducing disruption and bad publicity from some encampments should help reduce prejudice (or at least remove an excuse for it). They also suggest that site residents

⁵⁴ A Stonewall survey (*Profiles of Prejudice: The Nature of Prejudice in England, 2003*) found that 35% of adults interviewed admitted felling 'less positive' towards Gypsy-Travellers – a higher proportion than for any other ethnic group or asylum seekers and refugees.

and local house-dweller neighbours can get to know each other and work together towards common ends.

Community and Town Council Consultation

5.64 In an attempt to get local reactions to Gypsy-Traveller sites and their residents, we sent a letter asking for comments on relations between the community and site residents and suggestions for good practice to sixteen Community and Town Council Clerks and five Communities First Partnerships or voluntary agency umbrella groups in areas including local authority sites. Ten responses were received, nine from Community and Town Councils.

5.65 The most striking feature of answers is the clear distinction, made by almost everyone, between long-term site residents and transient Gypsy-Travellers stopping on unauthorised encampments for a period. The latter are seen as normally causing disruption while present, and leaving *'a terrible mess'* on departure to be cleared up at the expense of the council tax payers who also have to cover legal costs for evictions. Great resentment was expressed against such Gypsy-Traveller groups.

5.66 One consultee noted the presence of a Gypsy-Traveller site which had been set up without planning permission in their area. There have been many appeals and the site has eventually been approved. This process is said to have left bad feeling among settled residents who constantly monitor the site and report every minor breach of the conditions attached to the planning permission.

5.67 Comments on relations between site residents and local communities ranged from *'the vast majority of residents barely tolerate the presence of gypsy-travellers in the local authority sites and do not mix with them socially'* to *'long-term [site] residents are well integrated locally, and live just as other residents of the town except that they live in mobile homes'*. About half the responses were on each side of the balance.

5.68 Not all responses included suggestions for good practice on the way to improve relations. Three comments were made in this area:

- One consultee strongly argued for short-stay sites to reduce unauthorised encampments and thus remove a cause of local resentment against Gypsy-Travellers.
- One Community Council described its play schemes and how children from the Gypsy-Traveller site had been encouraged to join in. Children are said to have integrated well.
- Various initiatives, including Awareness Days designed to foster better relations, were noted in Cardiff where the Cardiff Gypsy and Traveller Project is active.

The consultation shows that local authority site residents can integrate well locally. It reinforces the point made above about the importance of reducing the impact of unauthorised encampment in order to improve relations, and suggests that long-drawn out planning battles should be avoided as well.

6. BENCHMARKING AND IDEAS FROM ELSEWHERE

6.1 Part of the brief for the research was to look at approaches taken towards providing and managing Gypsy-Traveller accommodation in other countries to see if there are ideas which might be applied in Wales. Two major considerations influenced the search for international materials:

- While there are Gypsy-Travellers in most/all European countries, in North America and elsewhere, lifestyle and accommodation characteristics vary. The most relevant comparators are those countries where (some) Gypsy-Travellers live in caravans and travel for part of the year at least.
- For purely practical reasons the search was limited to material in English and French.

6.2 The findings below draw on information from other countries of the United Kingdom, the Republic of Ireland and France. There are four themes: site provision; site improvement and refurbishment; forms of Gypsy-Traveller accommodation and wider policies; and site management.

6.3 The literature search has focused on Gypsy-Traveller accommodation initiatives. Within the resources of the research it has not been possible to look in any detail at the wider planning and housing frameworks in countries outside the United Kingdom. This is obviously a weakness, especially in connection with site provision.

GYPSY-TRAVELLER SITE PROVISION

6.4 The broad approach to Gypsy-Traveller site provision in Wales (and England) can be summarised in four phases:

- No particular policies prior to 1968 although local authorities were given discretionary powers to develop and manage caravan sites (including for Gypsy-Travellers) by the Caravan Sites and Control of Development Act 1960. This Act also tightened the system of planning controls on the development of land as caravan sites and required site licences for non-exempt sites. It permitted closure of common land to encampment.
- Between 1970 and 1994 the Caravan Sites Act 1968 placed a duty on local authorities to make provision for Gypsies residing in or resorting to their area; exchequer subsidy was available after 1980. While often criticised as inadequate and insufficiently enforced, the duty and subsidy did lead to provision of most of the local authority sites now existing.
- Between 1994 and 2004, following the repeal of the provision duty and subsidy by the Criminal Justice and Public Order Act 1994, the main emphasis on further site provision was by Gypsy-Travellers themselves working through the normal planning system as urged by Welsh Office Circular 2/1994 *Gypsy Sites and Planning* (guidance also urged local authorities to retain existing sites wherever possible). While the number of authorised private sites increased (in England at least), the problems faced by Gypsy-Travellers in getting planning permission and the growth of the unauthorised development of sites evidence the inadequacy of this approach in providing for an unpopular population group.

- Since 2004 a new policy framework is being developed where site provision is 'mainstreamed' in housing and planning systems by requiring local authorities to carry out assessments of need for Gypsy-Traveller accommodation (as for all housing) and accommodate those needs in housing strategies and development plans (see Chapter 5). In England finance is also to be mainstreamed with money for Gypsy-Traveller site provision to be provided through the housing 'pot' to be distributed regionally (see para 6.29 et seq for more details). The system is far too new for its effectiveness to be assessed.

6.5 In this context it is useful to look at experiences in the Republic of Ireland (RoI) and France.

Republic of Ireland

6.6 There are just under 7,000 Traveller families in Ireland, almost two-thirds living in bricks and mortar housing. Travellers are a highly marginalised group, suffering from ill health, unemployment, poverty and social exclusion. There are several strong groups representing Travellers in RoI⁵⁵.

6.7 Irish policy towards Travellers has developed through the 1963 *Report of the Commission on Itinerancy* and the 1983 *Report of the Travelling People Review Body*. In the first of these there was an explicit and in the second a less overt emphasis on encouraging 'settlement' and assimilation. Caravan sites tended to be seen as a step on the way to housing. This focus shifted somewhat in the 1990s with growing recognition of valuable cultural diversity and the need to tackle social exclusion of Travellers.

6.8 Moves to the current legislative position started in 1995 with the very influential *Report of the Task Force on the Travelling Community*. The Task Force dealt with many aspects of Traveller life including accommodation (also education, economy, health and discrimination). In response to the Task Force report the Department of the Environment, in 1996, published the *National Strategy for Traveller Accommodation* which envisaged the provision of 3,100 units of Traveller accommodation and the development of a five-year Traveller Accommodation Programme by each major local authority. A Traveller Accommodation Unit was established in the Department of the Environment in 1996 to oversee the preparation, monitoring, implementation and co-ordination of strategies at local level.

6.9 Also in 1996 the Department of Environment and Local Government established a National Traveller Consultative Committee to monitor the preparation, adequacy and implementation of local Programmes. This Committee includes representatives of Traveller organisations, local authorities and the Departments of Environment and Local Government, and Justice, Equality and Law Reform.

6.10 The national strategy is to be delivered primarily through the Housing (Traveller Accommodation) Act 1998. Briefly the Act requires major local authorities (county and city councils) to prepare and adopt by 31 March 2000 a five-year Traveller Accommodation Programme to meet existing and projected accommodation needs of Travellers in their area. Programmes must be prepared in consultation with Travellers, and the general public must be consulted on Draft Programmes and subsequent amendments. Programmes may be reviewed at any time, but in any event at least once every three years. Other features of the approach are:

⁵⁵ While there are also strong representative bodies for Gypsy-Travellers in England and Wales, most are located in England and liaise most with ODPM. The Cardiff Gypsy and Traveller Project is the only specifically Welsh body with links to the Welsh Assembly Government

- The adoption of the Programme will be a reserved function. If council members fail to adopt a Programme within the time allowed, the Manager (the chief executive officer of the City or County Council) will be required to adopt the Programme, by order, within one month subject to such modifications as the Manager considers necessary.
- The Programme must include certain elements including a needs assessment (existing and projected needs), proposals for accommodation of different types and implementation details.
- Authorities are obliged to take any reasonable steps as are necessary for the implementation of the Traveller Accommodation Programmes.
- Each council is obliged to set up a Local Traveller Accommodation Consultative Committee to facilitate consultation with Travellers about the preparation and implementation of the Programmes. The Committees are to comprise councillors, officials and representatives of Traveller organisations.
- The Local Government (Planning and Development) Act 1963 has been amended to ensure that local development plans specifically include objectives concerning the provision of Traveller accommodation.
- Annual reports prepared by local authorities must include details of the steps taken to secure implementation of the Traveller Accommodation Programmes and information concerning the proceedings of the Local Traveller Accommodation Consultative Committee.
- The capital costs of provision of temporary and permanent halting sites, transient halting sites and group housing schemes for Travellers is fully met by the Department of Environment and Local Government, subject to reasonable cost limits.
- A series of design guides have been produced for different forms of Traveller-specific accommodation. These stress the importance of good location, high standards and consultation with Travellers in schemes.

6.11 Superficially the legislative framework appears extremely supportive of provision for Travellers, with the need to plan (to a given deadline), measures to ensure Programme adoption, requirements to consult both Travellers and the settled community, emphasis on programmed implementation and explicit links to the planning system. What has happened since?

6.12 *The First Progress Report of the Committee to Monitor and Co-ordinate the Implementation of the Recommendations of the Task Force on the Travelling Community (2001) concluded that:*

'Progress in the actual provision of new accommodation has been very slow. Between 1998 and 1999, for example, there was an increase of only 68 in the number of Traveller families in accommodation provided by local authorities or with local authority assistance. It is particularly unsatisfactory that, over the same period, the numbers of families on the roadside or in other unauthorised sites rose from 1,148 to 1,207.'

6.13 The Irish Traveller Movement⁵⁶ reviewed progress with Traveller Accommodation Programmes in 2001. At that time, 38 Programmes had been adopted by 41 local authorities. The Programmes identify a total need of 3,600 units for the period 2000-2004. Of these 1,974 units are to meet current need and 1,626 are for projected need. If delivered these would meet the target of 3,100 new units from the Task Force Report. However, 37% of Programmes do not specifically name new locations or sites, and 21% have not included provision for transient sites. Overall, the Irish Traveller Movement was somewhat critical of assessment procedures which were seen to under-estimate need and bias it toward permanent housing; lack of specificity about implementation; the limited extent of transient provision planned; lack of cultural awareness in some proposals; and patchy consultation and involvement with Travellers.

6.14 In 2002 the Irish Traveller Movement produced a further report⁵⁷ reflecting on the experience to date. Amongst other things it identified some of the barriers to accommodation provision: planning issues; lack of recognition of the distinctive needs of Travellers; racism; lack of implementation measures; and legislation for dealing with unauthorised sites which is seen to conflict with the accommodation provision duties.

6.15 In 2004 the National Traveller Accommodation Consultative Committee reviewed the operation of the 1998 Act⁵⁸. The review was able to point to an increase in construction activity for Traveller-specific accommodation between 2000 and 2003 compared with 1996 to 1999 (457 units in the later period and 252 in the earlier period). In the later period, the greatest contribution to the total came from group housing units⁵⁹ (229), then basic service bays⁶⁰ (106), permanent halting site bays⁶¹ (90) and transient service bays (32). In the earlier period before the Traveller Accommodation Programmes, more than half of Traveller-specific accommodation construction was in the form of permanent halting site bays. The scarcity and cost of land is identified as one obstacle to provision. Looking at families accommodated rather than construction activity shows that 1,369 additional families were accommodated 2000-2003 compared with 516 between 1996 and 1999. In both periods, more than half of these families were accommodated in standard housing rather than any form of Traveller-specific accommodation. While the rate of provision of Traveller accommodation appears to have increased, it is unlikely to meet the target of over 3,000 units set for the five year Traveller Accommodation Programmes.

France

6.16 France has a varied population of Gypsy-Travellers which includes several distinct groups. The population is estimated at between 280,000 and 340,000. In terms of adults aged over 16, there are around 70,000 who are nomadic in lifestyle, 70,000 who are semi-nomadic and 110,000 who are sedentary. The generic legal term is '*gens du voyage*' (traveller).

56 Kathleen Fahy, *A Lost Opportunity? A Critique of Local Authority Traveller Accommodation Programmes*, The Irish Traveller Movement, 2001

57 Irish Traveller Movement, *Charting a Future Strategy for the Delivery of Traveller Accommodation*, 2002

58 NTACC, op cit, see 9 above

59 See para 6.35 et seq

60 Mostly basic site accommodation provided pending provision of permanent accommodation

61 Equivalent to permanent residential site pitches

6.17 The current legal picture for site provision was set by the 'Loi Besson' of 31 May 1990. This required each *département* (higher level local authority) to produce a plan outlining proposals for traveller accommodation, with reference also to schooling and economic activity. All *communes* (lower level local authorities) with over 5,000 population had to anticipate travel and residence within their area and provide sites accordingly. The law covers only sites for relatively short stays, not for permanent occupation, which appear to be subject to mainstream planning arrangements. Once sites had been provided, enhanced powers of eviction were given against unauthorised encampment.

6.18 Just as in England and Wales after the 1968 Act, progress on site provision following the *Loi Besson* was patchy and incomplete. By the late 1990s only a third of *départements* had drawn up an agreed plan. Only a third of the 1,739 *communes* with over 5,000 population had provided a site as required. Provision in total was estimated at about 10,000 pitches on about 4,000 sites (4,228 pitches in *aires de passage* designed for very short stays, and 5,658 in *aires de stationnement* designed for rather longer stays⁶²) against a target of 30,000.

6.19 In 2000 the law was strengthened significantly by *Loi No 2000-614* of 5 July 2000. The plan to be drawn up by each *département* now has a definite time limit to be agreed between central and local government representatives (within 18 months of the Act) with a default for the *préfet* (central government representative in the locality) to unilaterally draw up a plan if agreement cannot be reached in time. The plan is to be reviewed within six years.

6.20 Each *département* is to set up a consultative committee with representatives from the *communes* and Travellers to be chaired jointly by central and local government representatives for the *département*. The central government representative in the region is to co-ordinate the plans and check coherence.

6.21 All *communes* with a population of over 5,000 which figure in the plan must provide a site (although this can be sub-contracted or may be done in conjunction with others). *Communes* have two years to implement the plan and provide the required sites. Again there is a default provision allowing the central state to acquire and equip sites, at the *commune's* expense, if the *commune* fails to provide the site after two years and does not respond to an order. Where *communes* co-operate and provide the site within the time limit, 70% of expenses are met by the state; no such assistance is available where provision is carried out in default. Site management costs are also eligible for state assistance. Enhanced powers to evict unauthorised encampments follow site provision.

6.22 There are reports of concern at the rate of progress achieved under the 2000 Act. In 2004, after four years, 3,000-4,000 additional places had been created, with performance varying greatly between *départements* (five had not approved a plan)⁶³. Lack of progress has been attributed to unforeseen complexities in implementation (for example resistance from settled neighbours and planning issues), but also to reluctant local governments assuming that the national government might be less committed following elections in 2002. In the face of this delay, the Government has introduced, 'by stealth', an amendment giving *départements* and *communes* a further two years to comply without losing funding for sites. Thus the date by which sites can now lawfully be provided extends to the end of 2008. A recent report by the European Roma Rights Centre⁶⁴ provides a damning indictment of lack of progress in site provision and the poor environment and conditions of both existing and new provision.

62 Ministère du Logement, Dossier Accueil des gens du voyage, 12 May 1999

63 Tonino Serafini, 'La loi Besson reste dans les cartons', *Libération*, 19 August 2004

64 European Roma Rights Centre, *Always Somewhere Else : Anti-Gypsyism in France*, November 2005, Chapter 6

Site Provision: Comments

6.23 Both approaches set out a framework moving from needs assessment, through plans to be developed with consultation, to implementation assisted by government finance. The French duty on larger communes to make provision is more prescriptive than the Irish requirements. Both attempt to build in some means of overcoming local reluctance to act. A major difference is that the French law deals only with transit accommodation while the Irish covers all forms of Traveller accommodation and in practice has mostly led to the development of permanent accommodation. Both approaches seem to have led to increased provision, though in neither case have targets been met and progress has been slower than intended and certainly than advocates think is appropriate. Resistance to site development and continuing problems with the planning system are blamed in both cases, along with too little central and local commitment in some places.

6.24 Neither example seems to provide an entire answer in itself. Useful points to take forward are:

- Emphasis is needed on needs assessment, plans **and implementation**.
- Local processes are set within national strategies including targets against which progress can be monitored.
- It is clearly important to build in a strong role for central government to encourage and perhaps ultimately enforce action on reluctant local governments. This suggests that some form of default or enforcement powers should clearly be built in but also, and quite as important, central government must be willing to use them.
- Fairly formal consultation processes including Gypsy-Travellers and the settled community should be included.

GYPSY-TRAVELLER SITE IMPROVEMENT

6.25 Central government financial support for site improvement and refurbishment has been available to English local authorities for several years through the Gypsy Sites Refurbishment Grant (GSRG). The GSRG was introduced in 2001/2 as a challenge fund to help local authorities to improve and refurbish their Gypsy sites. It was initially introduced for three years, but was then extended for a further two years to 2005/6. From 2003/4 GSRG was made available for the provision of transit sites and stopping places, and in 2005/6 for the provision of new residential sites too. Successful bids for GSRG receive 75% of approved costs for site refurbishment and 100% of approved costs for new site provision. GSRG is only available on and for local authority sites. In total, over £30 million has been made available on a network of around 300 existing Gypsy sites across England. Bids have been assessed with the help of specialist consultants before being submitted to Ministers for approval.

6.26 The bidding guidance and application forms issued for each round of GSRG give an indication of its objectives and requirements. That issued for 2005/06⁶⁵ says:

- Refurbishment: may be awarded where refurbishment would significantly extend the useful life of an existing site; bring an unused or under-used site back into full use; improve the quality of life for the residents by modernising or improving sub-standard facilities; or provide new facilities.

⁶⁵ ODPM, *Gypsy Site Refurbishment Grant (GSRG) 2005/06 bidding guidance*, http://www.odpm.gov.uk/stellent/groups/odpm_housing/documents/page/odpm_house_033019.hcsp

- New residential sites: may be awarded where there is a demonstrated need for provision.
- New transit and stopping place sites: may be awarded where new sites would be likely to reduce nuisance or disorder arising from unauthorised encampments. The grant is not intended to deal with large-scale infrequent encampments such as those associated with fairs, festivals and large family gatherings.

6.27 In 2005/06 and previous rounds there were requirements that work should be completed within a specified deadline. Awards could not be made until planning permission had been secured. Great emphasis was placed on consultation with site residents for refurbishment and with all local stakeholders for new site development. Information was required on site sustainability and proposed management arrangements.

6.28 There has been no formal evaluation of the GSRG scheme to date. The following comments are based on limited published information, and informal and partial feedback gained from contacts with local authority officers in England and relate to the scheme as it has operated to the present.

- It is apparent that very few awards were made for new site provision. The great bulk of the awards have gone to site refurbishment. Many sites have had money spent on them which would not have been spent in the absence of the grant.
- One of the possible reasons why so few new sites have been funded is the potentially conflicting timescales between the nature of challenge funds where availability of funds and eligibility criteria are known quite late in the cycle and the requirement to have any necessary planning consents in place. Effectively this means that a new site must have been planned for some time before a bid can be made.
- The uncertainties of challenge fund bidding - each round was over-subscribed - also have implications for the consultation process. Site residents must obviously be involved in planning refurbishments, but consultations take place without any guarantee that funds will then be forthcoming. This risks disillusionment of a population group which is likely to be somewhat sceptical of authority in the first place, and could increase mistrust.
- There have been criticisms voiced of the standard of work achieved in some instances and of the costs of some tenders where contractors are said to have charged a 'premium' for working on a Gypsy site. This can put pressure on approved cost limits.
- Some authorities may have been deterred from bidding for a grant because (for refurbishment work) they had to contribute 25% of the approved costs. I have no information on this.

6.29 Guidance has been issued recently by ODPM outlining the newly-styled Gypsy and Traveller Sites Grant for 2006-2008. From 2006/07 onwards funding will be available to both local authorities and registered social landlords, covering both new sites and refurbishment, from the regional housing 'pot'. This is intended to bring the funding system more in line with the new arrangements for social housing and to promote more strategic regional delivery of sites.

6.30 An appropriate package of schemes within each region will be put together by the Regional Housing Boards, working with Government Offices to develop regional programmes in line with emerging priorities. Final funding recommendations will be made by the Regional Housing Boards and submitted to Ministers for clearance. For consistency, bidding guidance will continue to be drawn up centrally by ODPM in conjunction with the Government Offices and the Housing Corporation. ODPM will also arrange for the detailed analysis of bids by independent consultants to assist Regional Housing Boards in assessing schemes. The consultants will evaluate proposals against the following criteria:

- does the scheme meet a clearly assessed need?
- does the scheme offer value for money?
- is the site sustainable?

6.31 Nationally, up to £56 million is being made available over the next two years. Bids are invited for the two-year period, either as work phased across two years or separate bids for each year. Outline bids are encouraged. Grant rates remain at 75% of approved costs for refurbishment and 100% for new sites; there is no revenue funding element. Schemes must be able to demonstrate that they will be able to deliver to time and budget. Where a 25% local contribution or planning permission is required, evidence must be provided to show that they are either in place or that the process of obtaining them is well advanced. Confirmation that they are in place is required before any grant can be paid. Stakeholders must be consulted about proposals.

6.32 Some of these changes are clearly related to changes in the funding of housing overall in England and the greater role being given to the Regions. Others - the two year planning period and slight relaxation over the need for planning permissions in advance - are apparent attempts to overcome some of the problems of the GSRG regime for site provision. Time alone will tell how the changes impact upon Gypsy-Traveller site provision and refurbishment. In particular, the appetite for registered social landlords to become involved in Gypsy-Traveller site provision is unknown, but thought by many to be limited.

6.33 The model is obviously one to be considered for adoption in Wales for providing financial support for both refurbishment and new site development. With the smaller number of authorities in Wales, it may be possible to devise a fully collaborative approach to working between the Welsh Assembly Government and local authorities to achieve challenging yet realistic timescales and allow some certainty in effectively engaging site residents and other stakeholders in the process. Another specific aspect in Wales is the issue of low demand sites. One role of funding might be to enhance quality of life for site residents by reducing, in a planned way, the number of pitches.

FORMS OF GYPSY-TRAVELLER ACCOMMODATION AND WIDER POLICIES

6.34 A significant element in Traveller-specific accommodation in the Republic of Ireland (RoI) and Northern Ireland is group housing. RoI is also interesting because of the range of other policy measures adopted to assist Travellers with their accommodation.

Group Housing

6.35 Group housing was developed in the Republic of Ireland where it currently accommodates over 500 Traveller families. It has recently been introduced on a pilot basis in Northern Ireland. It is described as residential housing developments with additional facilities and amenities specifically designed to accommodate extended families of the Irish Traveller community on a permanent basis. The pattern established is of small groups of purpose-built bungalows or (less frequently) houses in small enclaves, which may or may not include a community house, play areas, stables and grazing and secure work areas - depending on size of scheme, location and Traveller needs. The bungalows (houses) are built to permanent housing standards and are detached or semi-detached so as to allow in-curtilege space for lorries and other vehicles, perhaps including caravans. Properties are rented. Costs of provision are 100% supported by government in RoI.

6.36 There does not seem to have been any detailed evaluation of group housing schemes in the RoI, which is perhaps surprising given the amount being built. Important points about group housing more informally reported (personal communication) as emerging from experience to date include:

- Relatively small schemes seem to work best and are more easily integrated into a locality. Successful sizes may range from about four to sixteen homes.
- Schemes work best when occupied by members of a single extended Traveller family or by families which are known to be compatible.
- Great emphasis is placed on intensive consultation with the Travellers who will live in the scheme in designing layout, facilities and the size and design of individual homes.
- Inevitably this is an expensive option, particularly where land costs are high, because of the accommodation density which is much lower than is usual for social rented housing.

6.37 Group housing has been piloted in Northern Ireland as part of the new policy⁶⁶ introduced in 2002 after the transfer of responsibility for site provision and management to the Northern Ireland Housing Executive (NIHE). A report⁶⁷ published by the NIHE in March 2005 evaluates the pilot. The definition of grouped housing adopted is '*residential housing developments with additional facilities and amenities specifically designed to accommodate extended families of Travellers on a permanent basis*'.

6.38 In implementing the pilot, the NIHE followed specific recommendations made by the PSI Working Group on Travellers⁶⁸:

- preferences of extended family groups should be taken into account in planning who is to be accommodated in the schemes;
- close consultation with and participation of Traveller families in design and layout of proposed accommodation;
- accommodation should include play and community facilities where needed;

⁶⁶ *New Policy on Accommodation for Travellers*, Department of the Environment for Northern Ireland, 1999

⁶⁷ *Evaluation of Traveller Grouped Housing*, Northern Ireland Housing Executive, 2005

⁶⁸ NEW TSN (Targeting Social Need), *Consultation on the Final Report of the PSI Working Group on Travellers*, 2001

- designs should incorporate space for economic activity alongside living areas if required.

6.39 The four pilots are:

- Eight dwellings plus non-residential premises including stables, a fenced paddock, garages and metal workshop for one extended family in Omagh (complete and occupied).
- Five dwellings and one serviced hardstanding for a single extended family in Toome (complete and occupied).
- Sixteen dwellings for two compatible extended families living (for 30 years) on a co-operated (long-term tolerated) site in West Belfast (completion of Phase 1 estimated for February 2005).
- Sixteen dwellings for four compatible extended families living (for ten years) on another co-operated site in West Belfast (construction expected to start year 2004/5).

6.40 All the schemes have included extensive consultation and partnership with Travellers according to a Communications Plan drawn up by NIHE. Consultants and the Traveller Movement (NI) have been involved in this. In each case, development is by a housing association partner. The rural schemes have proved much simpler to implement than the larger Belfast schemes, mainly because of land assembly and planning issues in the latter. There were issues around stabling and grazing of horses on one of the rural schemes which led to tensions with the settled community. The pilots are seen as valuable in helping iron out issues in the Communications Plan, scheme financing, early involvement of the development partner and so on. The completed schemes are greatly appreciated by their residents as providing culturally-sensitive accommodation. There are outstanding issues to be dealt with about allocation of any vacancies occurring in schemes in future. The evaluation does not include any reference to costs.

6.41 Group housing is an interesting approach, apparently popular with Travellers in both Northern Ireland and the Republic, and familiar to some Irish Travellers in Wales who have friends or relatives living there. The factors which seem to have contributed to the success of the pilots in Northern Ireland are the provision of funding, commitment and co-ordination by the NIHE, the existence of the umbrella organisation Traveller Movement (NI) to take part in the consultation process, and known groups of Travellers as future residents who can be fully involved in the design process. There is no information at present about costs relative to other options or longer-term management issues.

6.42 Group housing is a form of accommodation not currently tried in Wales. Residents consulted about the future of the Waterloo site in Pembroke Dock (Pembrokeshire) are reported to have favoured site closure and rehousing in an 'ethnic housing estate' which would appear to be following the group housing model. This might prove a valuable opportunity for joint action between the Welsh Assembly Government, the County Council and site residents to pilot and evaluate the option in Wales.

Other Traveller Accommodation Policies in the Republic of Ireland

6.43 It is worth drawing attention to one other form of Traveller-specific accommodation in the Republic of Ireland: 'basic service bays'. These are essentially sites with lower standards of amenities to be provided pending the provision of permanent halting sites or group housing, where Travellers are likely to have to wait up to five years or so for the long-term provision. Design guidelines advocate the provision of bathroom and WC amenities but perhaps on a temporary or demountable basis. This specific category within the RoI range of accommodation is interesting because it is designed to meet the needs which some transit pitches in Wales currently meet. It is an explicit recognition of the need for 'waiting' accommodation which avoids families living on the roadside or 'clogging up' transit accommodation.

6.44 Thus there is a well-established and recognised range of Traveller accommodation in Ireland. Wider assistance with Traveller accommodation is also available. A booklet⁶⁹ issued by the Department of the Environment and Local Government sets out the three pronged approach to Traveller accommodation in the widest sense:

- Assistance and incentives for Travellers to build, purchase or improve the private home of their choice.
 - grant of £3,000 to £4,000 (dependent on area and Irish language status) payable by the Department of the Environment upon purchase of a new house built to the required standards by people who have never previously bought or built a house for their own occupation. This is available to the whole population.
 - a special Travellers' grant of £3,000 from their local authority on purchase of a new house as above, or on purchase of a second-hand house for their own occupation, never having owned a house before.
 - assistance from local authorities available to the whole population including low cost housing sites, local authority loans for house purchase, shared ownership and tenant purchase schemes.
 - Traveller-specific grants and loans for purchase of caravans (pilot scheme introduced in February 2000). Loans up to a maximum of £5,000 are provided by local authorities, to be repaid over a period of up to five years (specific conditions apply). The grant element of the scheme (calculated at 10% of purchase price to a maximum of £500) further assists Travellers purchasing a caravan for the first time. The scheme is intended to help replace substandard caravans and to relieve over-crowding⁷⁰.
 - local authority loans for house improvements and repairs as available to the whole population.
 - assistance towards rent of private accommodation as for the whole population.
- Direct provision of accommodation by the local authority:
 - standard housing, allocated in order of priority taking all circumstances into account (as for the whole population);

⁶⁹ Department of the Environment and Local Government, *Accommodation Options for Travellers*, undated

⁷⁰ Press release 4/2/2000

- residential caravan parks for longer-term or permanent stays (capital costs are fully met by the Department of the Environment);
- transient or temporary halting sites (capital costs are fully met by the Department of the Environment);
- group housing schemes specifically for Travellers (capital costs are fully met by the Department of the Environment).
- A range of assistance and support to the voluntary sector to provide, for rent, a range of accommodation options:
 - Capital Assistance Scheme under which approved voluntary bodies may provide accommodation in either homes or serviced caravan parks to meet the special accommodation needs of Travellers. Funding up to 90% of the capital costs of a project is available subject to an overall unit cost limit for each family home. Capital funding of 100% of the cost of providing a residential caravan site for Travellers is also available subject to a maximum funding per bay;
 - suitable proposals for the provision of communal kitchens/dining facilities, crèches, laundries, meeting rooms etc may qualify for a grant equivalent to a specified sum for each unit of living accommodation subject to a maximum of 90% of the cost (from the National Lottery);
 - eligibility to assistance available to the whole population through rent subsidy, site costs, low cost housing sites, group shared ownership projects [not Traveller-specific group housing] and housing co-ops.

6.45 The list is long, reflecting both the range of housing assistance available to everyone in the Republic of Ireland and the number of Traveller-specific schemes. It has been quoted partly as an example of the way in which existing general and specific initiatives can be brought together to form a package and publicised as such. Caravan loans never seem to have been part of general policy in Wales - we have no evidence of possible demand. While grants or other financial support for Travellers to buy land to provide sites themselves is not included in the RoI list, one Gypsy-Traveller interviewed for the current research argued they should be introduced in Wales.

SERVICES TO GYPSY-TRAVELLERS AND SITE MANAGEMENT

6.46 Very little on Gypsy-Traveller site management appears in the easily-accessible literature. The interesting exception is Scotland where the Communities Scotland Regulation and Inspection Division include the provision of sites and services to Gypsy/Travellers within their housing performance regulation regime. Scotland is the only country within the UK to include services to Gypsy-Travellers explicitly within its performance regime.

6.47 Performance Standard AS6.1 reads *'We plan and provide or arrange good quality serviced stopping places for Gypsies/Travellers. We let pitches in a way that ensures fair and open access for all. We take Gypsies'/Travellers' views into account in delivering our services, and we are responsive to their needs.'*

6.48 In 2002 a Thematic Regulation Study was published⁷¹ which gives local authorities an indication of how services to Gypsies/Travellers will be assessed. The study used five challenge statements (numbered overleaf) and indicators (bullet points overleaf):

- i. Are there robust mechanisms in place for a strategic approach to the planning, provision or arrangement of sites based on good quality local information and in consultation with Gypsies/Travellers and the settled community?
 - whether planning of sites and services is integrated within broader planning processes;
 - how services are planned at a corporate or a service level;
 - Gypsies'/Travellers' role in these arrangements;
 - the existence and quality of written strategies;
 - the quality of information on the needs, preferences and aspirations of Gypsies/Travellers to feed into the planning process;
 - whether Gypsies/Travellers are covered by authority ethnic minorities or equal opportunities policies.
- ii. Is there a range of site provision and does that provision meet the needs of Gypsies/Travellers using the area?
 - level and type of site provision;
 - location of sites;
 - design and quality of sites based on available guidance and residents' opinions;
 - facilities on sites.
- iii. Are pitches let in a way that ensures fair and open access?
 - whether councils have clear and fair policies and procedures for allocating pitches;
 - the nature of tenancy agreements;
 - quality of information given to Gypsies/Travellers about services and how to access them.
- iv. Are the services for Gypsies/Travellers managed effectively in relation to clear service standards?
 - site management arrangements;
 - rents and other charges;
 - repairs and maintenance;
 - policy covering visitors on sites;
 - policies and procedures for dealing with anti-social behaviour;
 - handling of complaints.

71 Communities Scotland, *Services for Gypsies/Travellers*, Regulation & Inspection Thematic regulation studies 2002

- v. Are there appropriate mechanisms for consultation with Gypsies/Travellers and for their participation, both as service users and potential service users?
 - range of consultation and participation methods used;
 - monitoring and review of the outcome of consultation and feedback to Gypsies/Travellers by appropriate methods;
 - monitoring of complaints and appeals to help identify issues of concern;
 - resources given to support groups such as tenants associations and representative groups to encourage consultation and participation.

6.49 There is emphasis throughout that the approach to site planning, provision and management should be as similar as possible to that taken to mainstream social housing planning, provision and management.

6.50 This initiative is interesting and valuable for two rather different reasons. First, the very fact of including Gypsy-Traveller services, including site management, explicitly in the performance regime signals the seriousness with which the issue is taken. Second, the assessment criteria provide an unusually specific check-list of things to look for in a good service to Gypsy-Travellers.

7. CONCLUSIONS AND RECOMMENDATIONS

7.1 This chapter sets out the main conclusions from the research. It also makes a number of recommendations, mainly to the Welsh Assembly Government but also to local authorities and the Welsh Local Government Association (WLGA). There are six broad headings: overall strategy and the policy framework; the existing sites network; the need for additional residential site provision; the need for transit site provision; site management; and social housing. Comparisons are made at several points between Wales and England to highlight locally distinctive features⁷².

STRATEGY AND POLICY FRAMEWORK

7.2 The revised legislative framework for the planning and provision of Gypsy-Traveller accommodation is now in place in Wales and England. Local authorities will identify and assess Gypsy-Traveller accommodation needs within housing assessments, and will address those needs in housing strategies and Local Development Plans. ODPM Circular 01/2006 requires local planning authorities in England to identify specific locations for Gypsy-Traveller sites where there is need.

7.3 Our first conclusion is that there is no overall strategy for Gypsy-Traveller accommodation in Wales to act as a coherent framework for sub-regional or local strategies and plans. There was a strong feeling, from stakeholders and local authority personnel responding to the various surveys carried out, that the Welsh Assembly Government needs to give a clear lead.

7.4 The situation was not very different in England, and '*lack of any clear, widely understood national policy towards accommodation for Gypsies and other Travellers*' was the first conclusion from research published in 2003⁷³. There are areas of difference, however:

- More information on which to base policies is available in England in the form of the bi-annual Gypsy and Traveller Caravan Count.
- There are a number of strong representative and support groups for Gypsies and Travellers in England, and through these and the formation of the Gypsy and Traveller Law Reform Coalition, Gypsy-Traveller interests are regularly fed into relevant decision-making processes. While many of these bodies operate across Wales as well as England, they do not seem to be equally engaged in the policy process in Wales. The Cardiff Gypsy and Traveller Project is apparently the only significant Welsh agency representing Gypsy-Travellers.
- The number of local authorities in Wales is obviously much smaller than in England. Wales has the advantage of potentially having much closer relations between central and local government in devising and implementing strategies.

72 Most comparisons are with Pat Niner, *Local Authority Gypsy/Traveller Sites in England*, ODPM, 2003

73 Pat Niner, *ibid*, page 213

7.5 Against this background, we make the following recommendations:

Recommendation 1: The Welsh Assembly Government should develop a national strategy for Gypsy-Traveller accommodation provision. The strategy should be developed through consultation with local authorities, other relevant agencies, and Gypsy-Travellers.

Recommendation 2: A system of better information should be developed as a basis for planning accommodation and other services for Gypsy-Travellers and monitoring progress towards implementation. There are three priorities:

- The Gypsy-Traveller Caravan Count should be re-introduced in Wales. Launch events should stress the importance of this basic information as well as practical issues around how to carry out the Count. The Welsh Assembly Government and the WLGA both have roles here. Local authorities should carry out the Counts as comprehensively and accurately as possible. Welsh Assembly Government should consider ways in which the accuracy of the return can be assured.
- The Welsh Assembly Government should consult with local authorities, other agencies and Gypsy-Travellers to see how Gypsy-Travellers can best be included in ethnic record keeping and monitoring systems.
- In particular, better information is needed on planning applications and decisions for Gypsy-Traveller site provision, including single family caravan sites.

Recommendation 3: The Welsh Assembly Government should develop, issue and promote guidance on assessing Gypsy-Traveller accommodation needs. Draft guidance has already been issued for consultation. The importance of assessing 'hidden' needs from Gypsy-Travellers in housing should be stressed. Welsh Assembly Government and WLGA should together consider training needs of local authority personnel who will be carrying out assessments, and how best to encourage authorities, both formally and informally, to carry out high quality assessments.

Recommendation 4: The Welsh Assembly Government should consider funding 'community development' work to develop arrangements for effective national and local input by Gypsy-Travellers to the policy debate. This is a necessary pre-condition to many other recommendations which call for consultation with, and involvement of, Gypsy-Travellers. An immediate, practical way of engaging Gypsy-Travellers would be a programme of training to enable them to collect information for accommodation needs assessments.

Recommendation 5: The Welsh Assembly Government should, in consultation with existing agencies already working with Gypsy-Travellers, consider how best to develop a support body (or bodies) to work with and for Gypsy-Travellers across Wales.

Recommendation 6: Both Welsh Assembly Government and local authorities should continue and develop the process of considering and referring to the needs of Gypsy-Travellers in all relevant mainstream strategies and policies as a matter of course. Welsh Assembly Government and local authorities should consider carefully and implement the recommendations from the Commission for Racial Equality's scrutiny exercise on services for Gypsies and Irish Travellers when it is published. This latter is especially important as evidence suggests that there is continuing prejudice and discrimination

against Gypsy-Travellers in all spheres which must be tackled if site provision is to be successfully achieved.

Recommendation 7: In order to raise the profile of Gypsy-Traveller issues, the Welsh Assembly Government and the WLGA should work together to recognise and promote good practice in Gypsy-Traveller service provision. WLGA has a clear role in developing and disseminating a bank of good practice information as on other local government topics.

THE EXISTING SITES NETWORK

7.6 There are at least 30 Gypsy-Traveller sites in Wales, providing around 440 pitches. Nineteen sites are owned by local authorities, providing just under 380 pitches (excluding those that are closed and not available for letting). Most local authority sites are located within the North and South Wales coastal strips or in the Valleys. Demand for local authority sites is variable; some sites are over-subscribed, others have pitches which have been closed or are empty because of lack of demand. Very little is known about private sites in Wales; an unknown number of Gypsy-Travellers live on caravan sites not specifically designated or designed for Gypsy-Travellers.

7.7 Our main conclusion, especially from the condition survey, is that the existing network of local authority Gypsy-Traveller sites is not entirely fit for purpose. The network requires just under £3 million expenditure over the next five years to bring it to a good standard of repair. It will require over £10 million expenditure over 30 years to bring sites up to standard and maintain them at that level. Standards are particularly poor where transit pitches with minimal facilities are being used for long-stay residential purposes.

7.8 There are some clear differences between the site networks of Wales and England, although it is often not clear how or why those differences have come about:

- The overall level of authorised Gypsy-Traveller site places in relation to the total population is broadly similar in Wales and England. The provision of local authority sites/pitches is relatively higher in Wales, but the provision of authorised private site/pitches is relatively lower (para 2.3). Unauthorised development of sites by Gypsy-Travellers is less prevalent in Wales (para 2.39). The remaining points below refer to local authority sites only.
- Mixed sites with both residential and transit pitches are relatively more common in Wales than in England, but there are no purely transit sites as found in England (2.9).
- Welsh sites are larger on average than English sites (2.11) and are less likely to have been developed before 1980 (2.13). In Wales, average site size has increased over time, while the reverse is found in England (2.15).
- The urban/rural split in site location is broadly similar in Wales and England, but Welsh sites are more likely to be adjacent to industrial or commercial land uses (2.44) and more likely to experience problems in their surrounding areas (2.48).
- Surveyors were more likely to judge Welsh than English sites as being poor or very poor in visual quality (2.54). Welsh sites are relatively better than their English counterparts in providing for pedestrian/vehicular segregation (2.60).

- Pitches on Welsh sites are on average larger than on English sites, but tend to be narrower (2.71) and are more likely to be irregularly shaped (2.70). Despite relatively generous pitch sizes, six metre separation between caravans can be achieved on fewer Welsh than English sites (2.66). Welsh sites appear to be more intensively occupied than English ones.
- Amenity units on Welsh sites are on average larger than on English sites (2.76) and are more likely to be designed so that the WC can be entered from the outside rather than from an area where food might be prepared (2.77). Amenity units thus seem better adapted to cultural norms than in England.
- Average costs of bringing sites to a good standard of repair and maintaining that standard over 30 years are similar or slightly less in Wales than in England (2.84).
- Broadly these points might be summarised as suggesting that local authority sites in Wales are rather more generous in space standards of pitches and amenity units than their English counterparts, are more likely to have culturally-sensitive design, and are in similar or better condition. However, they compare badly on environment and many are so intensively occupied as to compromise fire safety standards.

7.9 The following recommendations are made:

Recommendation 8: The Welsh Assembly Government should seek to develop - in conjunction with local authorities and Gypsy-Travellers - a 'decent sites standard' which would incorporate location and environment as well as site design, facilities and infrastructure, and amenity unit size, design and facilities. Wherever possible, improvements of existing sites should aim to meet this standard; the standard will also be applied to new site proposals. The standard should reflect the fact that Gypsy-Traveller sites are a species of housing and should thus conform to expectations for residential development.

Recommendation 9: The Welsh Assembly Government should commission research on differential demand for local authority sites across Wales, aiming particularly to identify factors underlying low demand, and the extent to which investment might create a sustainable site perhaps with fewer pitches. Relationships between site management, pitch allocations and low demand should be explored.

Recommendation 10: The Welsh Assembly Government should introduce a scheme along the lines of the English Gypsy Sites Refurbishment Grant to provide funds for site improvement and refurbishment. The scheme should provide some certainty to local authorities to encourage them to undertake preliminary consultation with site residents and to get any necessary planning permissions. In the short term at least, funds for site improvement should be ring-fenced, and should aim to achieve expenditure of about £3 million over the next five years.

Recommendation 11: In targeting funds for site improvement, the Welsh Assembly Government should consider giving priority to:

- Sites where there is proven demand for pitches and the site is sustainable, especially where refurbishment could involve an increase in the number of pitches to be provided which is thought manageable by both site managers and site residents.

- Sites where there is low demand but existing site residents are suffering poor conditions because of vacant/closed pitches and where investment could improve living standards and ensure that the site remains sustainable albeit at a smaller size. Proposals for works should allow future expansion if demand increases again.

Recommendation 12: Cases to be made when bidding for funds should emphasise:

- Involvement of site residents in developing the proposals.
- The extent to which the 'decent site standard' can be achieved, and how any shortfalls can be mitigated.
- Where there is low demand at present, an analysis of the causes of low demand (eg locational problems, current standards and conditions, social or family reasons) and how the proposed works would impact on demand in future.
- Proposed site management arrangements, and how these would contribute to site sustainability and security for investment as well as high quality services to residents.

NEED FOR ADDITIONAL RESIDENTIAL SITE PROVISION

7.10 The research made estimates of need for additional residential site pitches over the next five years, intended to address current shortfalls and family growth. There is also an allowance for Gypsy-Travellers currently living in housing because there is no realistic chance of a site pitch. The research concludes that there is a need for an estimated 275-305 additional long-stay places for Gypsy-Travellers by 2011. Demand for local authority site places is estimated at 150-200 places and demand for private site places is estimated as 50 pitches. Turnover on local authority sites will provide pitches for re-letting, but relatively few vacancies will arise on the popular sites where there are waiting lists. There are no firm plans for sites to meet these shortfalls and current planning policies seem unlikely to deliver additional places either for local authority or private sites.

7.11 Recommendations are:

Recommendation 13: The Welsh Assembly Government should make available funding for the capital cost of providing local authority sites. This should be equivalent to 100% of approved costs, and should be ring-fenced both from other forms of social housing and Gypsy-Traveller site improvement.

Recommendation 14: Gypsy-Traveller caravan sites should be clearly re-defined as a species of social housing, and thus eligible for revenue subsidy towards site management costs in the same way as bricks and mortar housing.

Recommendation 15: Where local authority sites have a waiting list and/or doubling up of families on pitches and/or numbers of young people of marriageable age who would like site accommodation, local authorities should, as a matter of priority, explore options for site extension and embark on an exercise to find locations for further site development. Gypsy-Travellers should be closely involved in this process.

Recommendation 16: Local planning authorities should, as quickly as possible, identify actual locations for sites in Local Development Plans wherever assessments indicate that there is a need. The Welsh Assembly Government should issue circular guidance

which makes this requirement absolutely clear. The Welsh Assembly Government should also develop good practice guidance advising local authorities how best to go about identifying site locations.

Recommendation 17: The accommodation needs and preferences of Gypsy-Travellers are as varied as those of the settled community. In recognition of this, a variety of accommodation should be aimed for, not just the provision of 'standard', formal local authority sites for about 20 families. The range should include:

- Private site provision - the level of demand appears to be low at present at least partly because Gypsy-Travellers see the private provision option as impossible to achieve. The prime requirement is for local planning authorities to identify land where private site provision will be permitted and, in addition, to set realistic, achievable criteria against which applications for sites will be assessed. When it becomes apparent that local planning authorities are willing to grant planning permission, the Welsh Assembly Government might consider giving grants/loans to Gypsy-Travellers to buy land and develop sites.
- Small local authority sites for five to ten caravans, for a single extended family. One of the attractions of private site development is being able to live with near family only. Why should this not be facilitated in the public sector? A pilot scheme might be considered for authorities to provide land with a planning consent and encourage the families to develop the site themselves to meet the decent sites standard.
- Group housing on the Irish model. A possible collaborative pilot, involving the Welsh Assembly Government, the local authority and Gypsy-Travellers, might be based on the Waterloo site in Pembroke Dock where residents have expressed an interest in such an option.

NEED FOR TRANSIT SITES AND ACCOMMODATION FOR NOMADISM

7.12 While there is an apparent trend towards greater 'settlement' on the part of many Gypsy-Traveller families, some families maintain a travelling lifestyle, and many more families like to travel for a period in the year, or for family or other cultural events, or for holidays. At present, formal transit accommodation for Gypsy-Travellers travelling with caravans/trailers in Wales is provided through transit pitches on seven local authority sites. It is not clear how many of these pitches actually fulfil a transit function, but not all do. Some Gypsy-Travellers make their own accommodation arrangements when travelling, eg staying on holiday caravan sites or with relations. Apart from this, nomadism is 'accommodated' through unauthorised encampments which occur on occasion anywhere in Wales but regularly along the main north and south coastal routes, on some other through-routes and in the area around Aberystwyth.

7.13 We conclude that current site provision, coupled with policies for managing unauthorised encampments, do not achieve successful outcomes for Gypsy-Travellers or the local business and settled communities. It is estimated that places for 100-150 families would be needed across Wales to reduce significantly the need for uncontrolled unauthorised encampment.

7.14 The situation is little different in England. In England, as in Wales, most travelling Gypsy-Travellers are 'accommodated' on unauthorised encampments in a way which is unsatisfactory

to all parties. Again as in Wales, not all the transit sites and pitches provided fulfil a transit function. English experience suggests that managing formal transit sites is challenging, especially while there is no transit network for Gypsy-Travellers to move within.

7.15 In this area, we recommend:

Recommendation 18: Local authorities should develop strategies for the management of unauthorised encampment in line with Welsh Assembly Government/Home Office Guidance⁷⁴, and the Welsh Assembly Government should encourage this. In particular, local authorities should co-operate with Police Forces to produce inter-agency protocols and agreements and to facilitate on-the-ground joint working.

Recommendation 19: In drawing up their strategies, local authorities should be aware of, and seek to assess the relative importance of, different ‘types’ of unauthorised encampment which arise since these have different policy responses. Some of the ‘types’ are:

- Some unauthorised encampments arise because families are waiting for a pitch on a residential site and have nowhere else to live; such families also occupy some ‘transit’ pitches on existing sites. It might be appropriate to identify land where basic facilities could be provided until pitch vacancies arise or a new site is provided.
- Some unauthorised encampments stem from Gypsy-Travellers visiting local families for a short period for a special family event or a holiday. Some at least of this need could be accommodated through the provision of larger pitches and relaxed rules about visitors on both local authority and private sites. Accommodating visitors is a relevant consideration in the decent site standard advocated above.
- Some unauthorised encampments in remote and rural areas reflect (especially) New Travellers seeking to live a low impact, environmentally-friendly lifestyle. This need might be tackled as part of a ‘green’ agenda rather than through Gypsy-Traveller policies.
- Some unauthorised encampments - probably the majority - are by groups of Gypsy-Travellers travelling from place to place, often for employment reasons. The main options here are pro-active management of unauthorised encampments and the provision of formal transit accommodation.

Recommendation 20: Local strategies should, where appropriate, include reference to each ‘type’ of unauthorised encampment and the proposed approach. The objective should be to develop arrangements under which Gypsy-Travellers can stay in an area for a period of time (eg up to 28 days) without the threat of eviction so long as they conform to reasonable behaviour expectations. For those truly ‘in transit’ arrangements might include:

- Stated willingness to allow encampments to remain so long as the encampment does not cause serious disruption by reason of its location and/or the behaviour of the families involved. Basic services should be provided to the encampment (refuse collection, toilet provision) and Gypsy-Travellers helped to access necessary education or health services. The encampment would be monitored and managed as outlined in the Guidance.

⁷⁴ Welsh Assembly Government and Home Office, *Guidance on Managing Unauthorised Camping*, 2005

- Identification of locations to which families could be directed, relatively informally, and encampments subsequently managed pro-actively as above.
- Provision of formal, serviced and managed transit sites or stopping places where the level and frequency of encampments evidence need for provision. Some such sites might be provided privately by Gypsy-Travellers themselves.

Recommendation 21: Welsh Assembly Government should carry out or encourage a review of the current condition and role of ‘transit’ pitches on existing local authority sites with a view to making proposals to either convert to residential use or ensure, through active site management, that the pitches fulfil a true transit function.

GYPSY-TRAVELLER SITE MANAGEMENT

7.16 A further set of conclusions relate to local authority site management:

- There are no guidelines for site management, and no apparent forum in Wales where either philosophies or practicalities of site management can be discussed.
- Site management is extremely variable across Wales in terms of staffing levels and, in practice, the extent to which sites are actively ‘managed’ as opposed to largely self-managed.
- There is no simple relationship between site management style and either site condition or level of demand, although management can obviously have implications for sustainability.
- Because site residents are licensees, their rights are significantly less than those of social housing tenants.

7.17 Comparison with England reveals some ways in which site management is rather different in Wales:

- Average numbers of people per pitch are higher and the child/adult balance is greater in Wales than in England (para 3.25), perhaps suggesting a more demanding management task. Staffing levels appear broadly similar on average (3.18).
- A higher proportion of sites in Wales than in England are managed by departments also responsible for social housing management (3.13).
- Perhaps as a consequence, some management features special to Gypsy-Traveller sites are found less frequently in Wales than in England. For example, there is less door-to-door collection of fees and charges (3.88), initial damage deposits are rarer (3.86) and lesser priority is overtly given to family and personal compatibility in pitch allocations (3.72). Welsh site management appears to be closer to mainstream housing management than in England.
- Licence fees are significantly lower on average in Wales than in England (3.83). As a consequence a higher proportion of sites run in deficit so that expenditure normally exceeds income (3.132).

7.18 Our recommendations are:

Recommendation 22: The Welsh Assembly Government should develop a model site licence agreement setting out rights and responsibilities of both the landlord and the licensee in plain and easy-to-understand language. The possibility of giving licensees rights equivalent to those enjoyed by social tenants, including greater security of tenure, should be explored.

Recommendation 23: The Welsh Assembly Government should introduce site management guidelines, including expectations on staffing levels, allocation policies, repair services, resident consultation and general enforcement approaches. Wherever possible, parity with mainstream housing management expectations should be achieved.

Recommendation 24: Both the model licence agreement and site management guidelines should be developed through an inclusive process of consultation involving site managers, WLGA, Gypsy-Travellers and site residents aimed to identify good practice.

Recommendation 25: Where local authorities contract site management to another body (at present exclusively the Gypsy Council), the terms of the contract should be sufficiently precise to be enforced if need be. Management performance should be monitored as would be the case in any other contracting arrangement.

GYPSY-TRAVELLERS AND SOCIAL HOUSING

7.19 This research has concentrated on sites rather than housing options for Gypsy-Travellers. However, we conclude that Gypsy-Travellers are likely to continue to move into and out of social housing in the future as they have in the past. For some, this is a positive choice, likely to be made even when site provision is increased. For others, a realistic site option might make bricks and mortar housing relatively less attractive. Current access and allocation policies appear to allow Gypsy-Travellers to move into housing at a rate which appears to match current and likely future demand. There is little evidence of particular support being given to Gypsy-Travellers in housing, except in Cardiff.

7.20 We recommend:

Recommendation 26: Gypsy-Travellers should be included in homelessness strategies and policies wherever unauthorised encampments are experienced since such families are homeless. Wherever possible, local authorities should offer homeless Gypsy-Travellers site places where these are preferred.

Recommendation 27: Allocation policies of social landlords should be sensitive to the cultural needs of Gypsy-Travellers when making offers of accommodation. Tenancy support should be available to help Gypsy-Travellers make the transition to living in houses and on estates where this is new.

Recommendation 28: Gypsy-Traveller issues should be included in all equality and diversity training for housing officers in local authorities and registered social landlords, and officers should be made aware of the possibility of racial harassment against housed Gypsy-Travellers.

SCHEDULE USED IN CONDITION SURVEY

	Rate	Life	Unit	C/up	Quantity
HEADER					
Unitary Authority					
The Isle of Anglesey	n/a	-	✓		<input type="text"/>
Gwynedd	n/a	-	✓		<input type="text"/>
Conwy	n/a	-	✓		<input type="text"/>
Denbighshire	n/a	-	✓		<input type="text"/>
Flintshire	n/a	-	✓		<input type="text"/>
Wrexham	n/a	-	✓		<input type="text"/>
Powys	n/a	-	✓		<input type="text"/>
Carmarthenshire	n/a	-	✓		<input type="text"/>
Pembrokeshire	n/a	-	✓		<input type="text"/>
Swansea	n/a	-	✓		<input type="text"/>
Neath Port Talbot	n/a	-	✓		<input type="text"/>
Bridgend	n/a	-	✓		<input type="text"/>
Rhondda Cynon Taf	n/a	-	✓		<input type="text"/>
Merthyr Tydfil	n/a	-	✓		<input type="text"/>
The Vale of Glamorgan	n/a	-	✓		<input type="text"/>
Cardiff	n/a	-	✓		<input type="text"/>
Caerphilly	n/a	-	✓		<input type="text"/>
Blaenau Gwent	n/a	-	✓		<input type="text"/>
Torfaen	n/a	-	✓		<input type="text"/>
Monmouthshire	n/a	-	✓		<input type="text"/>
Newport	n/a	-	✓		<input type="text"/>
Management					
Unitary Authority	n/a	-	✓		<input type="text"/>
Private	n/a	-	✓		<input type="text"/>
Gypsy Council	n/a	-	✓		<input type="text"/>
Site Type					
Permanent	n/a	-	✓		<input type="text"/>
Transit	n/a	-	✓		<input type="text"/>
Mixed	n/a	-	✓		<input type="text"/>
Age of Site	n/a	-	Yrs		<input type="text"/> Yrs
Warden/Caretaker					
Warden/Caretaker Resident?	n/a	-	-	<input type="text"/> Yes	<input type="text"/> No
Wardens/Caretakers Office Provided?	n/a	-	-	<input type="text"/> Yes	<input type="text"/> No
Number of Pitches					
Permanent	n/a	-	Nr		<input type="text"/> Nr
Transit	n/a	-	Nr		<input type="text"/> Nr

	Rate	Life	Unit	C/up	Quantity
Amenity Blocks Per Pitch (Average)					
None	n/a	-	✓		<input type="text"/>
1 per pitch	n/a	-	✓		<input type="text"/>
More than 1 per pitch	n/a	-	✓		<input type="text"/>
Less than 1 per pitch	n/a	-	✓		<input type="text"/>
Play Areas Provided?	n/a	-	n/a		<input type="text" value="Yes"/> <input type="text" value="No"/>
SITE					
Size of Site (approximate area)	n/a	-	m2		<input type="text" value="m2"/>
Number of pitches					
Number of Single Pitches	n/a	-	✓		<input type="text"/>
Number of Double Pitches	n/a	-	✓		<input type="text"/>
Number of Vacant Pitches	n/a	-	✓		<input type="text"/>
Number of Unuseable Pitches	n/a	-	✓		<input type="text"/>
Is the site considered to be overcrowded?					<input type="text" value="Yes"/> <input type="text" value="Partially"/> <input type="text" value="No"/>
Visual Quality of Site Entrance					
Good	n/a	-	✓		<input type="text"/>
Average	n/a	-	✓		<input type="text"/>
Poor	n/a	-	✓		<input type="text"/>
Visual Quality of General Site					
Very Good	n/a	-	✓		<input type="text"/>
Good	n/a	-	✓		<input type="text"/>
Average	n/a	-	✓		<input type="text"/>
Poor	n/a	-	✓		<input type="text"/>
Very Poor	n/a	-	✓		<input type="text"/>
General Quality of Pitch Surfaces across Site					
Very Good	n/a	-	✓		<input type="text"/>
Good	n/a	-	✓		<input type="text"/>
Average	n/a	-	✓		<input type="text"/>
Poor	n/a	-	✓		<input type="text"/>
Very Poor	n/a	-	✓		<input type="text"/>
Site Movement					
Clear and safe vehicle/pedestrian segregation?	n/a	-	n/a		<input type="text" value="Yes"/> <input type="text" value="No"/>
Site suitable for disabled access and movement?	n/a	-	n/a		<input type="text" value="Yes"/> <input type="text" value="No"/>
Pitch Boundaries Generally					
Pitch Boundaries Clearly Defined?	n/a	-	n/a		<input type="text" value="Yes"/> <input type="text" value="No"/>
Pitch Boundaries Consistent Across the Site?	n/a	-	n/a		<input type="text" value="Yes"/> <input type="text" value="No"/>

Site Problems

(enter value 1-5, with 1 being good, 5 being severe)

Litter/Rubbish/Dumping	n/a	-	1 to	<input type="text"/>
Graffiti	n/a	-	1 to 5	<input type="text"/>
Vandalism	n/a	-	1 to 5	<input type="text"/>
Dog Excrement	n/a	-	1 to 5	<input type="text"/>
Vacant/Derelict buildings	n/a	-	1 to 5	<input type="text"/>
Intrusive Industry	n/a	-	1 to 5	<input type="text"/>
Non-conforming Land Use	n/a	-	1 to 5	<input type="text"/>
Ambient Air Quality	n/a	-	1 to 5	<input type="text"/>
Heavy Traffic	n/a	-	1 to 5	<input type="text"/>
Intrusion from Motorways	n/a	-	1 to 5	<input type="text"/>
Railway/Aircraft Noise	n/a	-	1 to 5	<input type="text"/>
Nuisance from Parking	n/a	-	1 to 5	<input type="text"/>
Scruffy gardens/landscape	n/a	-	1 to 5	<input type="text"/>
Evidence of rats/vermin	n/a	-	1 to 5	<input type="text"/>

Contribution to Site Problems

Normal Wear and Tear	n/a	-	✓	<input type="text"/>
Inadequate Maintenance	n/a	-	✓	<input type="text"/>
Inappropriate Use	n/a	-	✓	<input type="text"/>
Poor Design/Specification	n/a	-	✓	<input type="text"/>

Site Security

Entrance Control Building	n/a	-	✓	<input type="text"/>
Secure Entrance Gates/Barrier	n/a	-	✓	<input type="text"/>
Barbed Wire (or similar)	n/a	-	✓	<input type="text"/>
Floodlighting to general areas	n/a	-	✓	<input type="text"/>
CCTV Cameras	n/a	-	✓	<input type="text"/>

Site Access

Safe Access/Egress Provision?	n/a	-	n/a	<input type="text"/> Yes <input type="text"/> No
-------------------------------	-----	---	-----	--

Entrance Signage

None	n/a	-	✓	<input type="text"/>
Metal	800	20	Yr/Nr	<input type="text"/> <input type="text"/> <input type="text"/> m2
Timber	800	15	Yr/Nr	<input type="text"/> <input type="text"/> <input type="text"/> m2

Entrance Signage Adequate?

n/a	-	n/a	<input type="text"/> Yes <input type="text"/> No
-----	---	-----	--

Entrance Barrier

None	n/a	-	✓	<input type="text"/>
Metal	3,000	20	Yr/Nr	<input type="text"/> <input type="text"/> <input type="text"/> m2
Timber	3,000	15	Yr/Nr	<input type="text"/> <input type="text"/> <input type="text"/> m2

Entrance Gate

None	n/a	-	✓	<input type="text"/>
Metal	1,500	20	Yr/Nr	<input type="text"/> <input type="text"/> <input type="text"/> m2
Timber	1,500	15	Yr/Nr	<input type="text"/> <input type="text"/> <input type="text"/> m2

Site Boundaries

Site Boundary Appearance

	Rate	Life	Unit	C/up	Quantity
Very Good	n/a	-	✓		<input type="text"/>
Good	n/a	-	✓		<input type="text"/>
Average	n/a	-	✓		<input type="text"/>
Poor	n/a	-	✓		<input type="text"/>
Very Poor	n/a	-	✓		<input type="text"/>

General

Is Site fully contained on all sides?	n/a	-	n/a	<input type="text"/> Yes <input type="text"/> No
Unprotected Water Course on boundary?	n/a	-	n/a	<input type="text"/> Yes <input type="text"/> No

Boundary Fencing

None	n/a	-	✓	<input type="text"/>
Chain link	25	20	Yr/m	<input type="text"/> <input type="text"/> <input type="text"/> m
Post & wire	22	20	Yr/m	<input type="text"/> <input type="text"/> <input type="text"/> m
Timber ranch style	35	20	Yr/m	<input type="text"/> <input type="text"/> <input type="text"/> m
Timber panel	35	20	Yr/m	<input type="text"/> <input type="text"/> <input type="text"/> m
Chestnut Paling	25	20	Yr/m	<input type="text"/> <input type="text"/> <input type="text"/> m
Galvanised Steel Paling	50	30	Yr/m	<input type="text"/> <input type="text"/> <input type="text"/> m
Other	55	20	Yr/m	<input type="text"/> <input type="text"/> <input type="text"/> m

Boundary Walls

None	n/a	-	✓	<input type="text"/>
Brick	50	50	Yr/m2	<input type="text"/> <input type="text"/> <input type="text"/> m2
Block	30	50	Yr/m2	<input type="text"/> <input type="text"/> <input type="text"/> m2
Concrete Panel	30	50	Yr/m2	<input type="text"/> <input type="text"/> <input type="text"/> m2
Stone	80	60	Yr/m2	<input type="text"/> <input type="text"/> <input type="text"/> m2
Other	60	50	Yr/m2	<input type="text"/> <input type="text"/> <input type="text"/> m2

Boundary Earth Banking

Earth boundary banking	n/a	-	n/a	<input type="text"/> Yes <input type="text"/> No
------------------------	-----	---	-----	--

Boundary Landscaping

None	n/a	-	✓	<input type="text"/>
Shrubs/Hedges	n/a	-	✓	<input type="text"/>
Trees	n/a	-	✓	<input type="text"/>

Roads/Pavings

Site Roads

None	n/a	-	✓	<input type="text"/>
Tarmac	50	25	Yr/m2	<input type="text"/> <input type="text"/> <input type="text"/> m2
Concrete	50	25	Yr/m2	<input type="text"/> <input type="text"/> <input type="text"/> m2
Crushed Concrete	50	25	Yr/m2	<input type="text"/> <input type="text"/> <input type="text"/> m2
Gravel	20	20	Yr/m2	<input type="text"/> <input type="text"/> <input type="text"/> m2
Grass/Earth	50	25	Yr/m2	<input type="text"/> <input type="text"/> <input type="text"/> m2
Other	50	25	Yr/m2	<input type="text"/> <input type="text"/> <input type="text"/> m2

	Rate	Life	Unit	C/up	Quantity
Site Roads Provision					
Site Roads width greater than 5m?	n/a	-	n/a	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Adequate Turning Circle Provision?	n/a	-	n/a	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Traffic Calming measures					
None	n/a	-	✓	<input type="checkbox"/>	
Speed Bumps	n/a	-	✓	<input type="checkbox"/>	
Chicanes/Bends	n/a	-	✓	<input type="checkbox"/>	
Other	n/a	-	✓	<input type="checkbox"/>	
Are current Traffic Calming measures effective?	n/a	-	n/a	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Site Footpaths					
None	n/a	-	✓	<input type="checkbox"/>	
Tarmac	50	25	Yr/m2	<input type="checkbox"/>	<input type="checkbox"/> m2
Concrete	50	25	Yr/m2	<input type="checkbox"/>	<input type="checkbox"/> m2
Crushed Concrete	50	25	Yr/m2	<input type="checkbox"/>	<input type="checkbox"/> m2
Gravel	20	20	Yr/m2	<input type="checkbox"/>	<input type="checkbox"/> m2
Grass/Earth	50	25	Yr/m2	<input type="checkbox"/>	<input type="checkbox"/> m2
Other	50	25	Yr/m2	<input type="checkbox"/>	<input type="checkbox"/> m2
Site Footpath widths generally greater than 0.75m wide?	n/a	-	n/a	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Lighting					
Site Lighting					
None	n/a	-	✓	<input type="checkbox"/>	
Low Level Bollards	250	20	Yr/Nr	<input type="checkbox"/>	<input type="checkbox"/> Nr
High Level Bollards	350	20	Yr/Nr	<input type="checkbox"/>	<input type="checkbox"/> Nr
High Level Street Lamps	750	20	Yr/Nr	<input type="checkbox"/>	<input type="checkbox"/> Nr
Other	500	20	Yr/Nr	<input type="checkbox"/>	<input type="checkbox"/> Nr
Site Lighting Adequate?	n/a	-	n/a	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Formal Parking					
Formal Parking Generally					
Sufficient Formal Parking Facilities Provided?	n/a	-	n/a	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Number of formal Parking Spaces	n/a	-	Nr	<input type="checkbox"/> Nr	
Additional formal Parking Facilities Required?	n/a	-	n/a	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Parking Paving					
Not Applicable	n/a	-	✓	<input type="checkbox"/>	
Tarmac	50	25	Yr/m2	<input type="checkbox"/>	<input type="checkbox"/> m2
Concrete	50	25	Yr/m2	<input type="checkbox"/>	<input type="checkbox"/> m2
Crushed Concrete	50	25	Yr/m2	<input type="checkbox"/>	<input type="checkbox"/> m2
Gravel	20	20	Yr/m2	<input type="checkbox"/>	<input type="checkbox"/> m2

	Rate	Life	Unit	C/up	Quantity
Grass/Earth	50	25	Yr/m2	<input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/> m2
Other	50	25	Yr/m2	<input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/> m2

Garages

Garages Provision

Garages Provided?	n/a	-	n/a	<input type="text"/> Yes <input type="text"/> No
Number of Garages Provided Across Site	n/a	-	Nr	<input type="text"/> Nr

Garages General Condition

General Condition Assessment of Prog.				<input type="text"/> Good <input type="text"/> Aver
Rep. Garages	n/a	-	n/a	<input type="text"/> Poor
Garages to be Completely Re-built	6,000	-	Nr	<input type="text"/> Nr

Site Signage

Signage

Site Signage Provided?	n/a	-	n/a	<input type="text"/> Yes <input type="text"/> No
Site Signage Adequate?	n/a	-	n/a	<input type="text"/> Yes <input type="text"/> No

Work Areas

Work Areas Provision

Communal Work Areas Provided?	n/a	-	n/a	<input type="text"/> Yes <input type="text"/> No
Communal Work Areas in use?	n/a	-	n/a	<input type="text"/> N/A <input type="text"/> Yes <input type="text"/> No
Communal Work Areas Required?	n/a	-	n/a	<input type="text"/> N/A <input type="text"/> Yes <input type="text"/> No

Work Area Paving

Not Applicable	n/a	-	✓	<input type="text"/>
Tarmac	50	25	Yr/m2	<input type="text"/> <input type="text"/> <input type="text"/> m2
Concrete	50	25	Yr/m2	<input type="text"/> <input type="text"/> <input type="text"/> m2
Gravel	20	20	Yr/m2	<input type="text"/> <input type="text"/> <input type="text"/> m2
Grass/Earth	50	25	Yr/m2	<input type="text"/> <input type="text"/> <input type="text"/> m2
Other	50	25	Yr/m2	<input type="text"/> <input type="text"/> <input type="text"/> m2

Play Areas

Play Areas Provision

Play Area Provided?	n/a	-	n/a	<input type="text"/> Yes <input type="text"/> No
Play Area used?	n/a	-	n/a	<input type="text"/> N/A <input type="text"/> Yes <input type="text"/> No
Are Play Area Facilities Safe?	n/a	-	n/a	<input type="text"/> N/A <input type="text"/> Yes <input type="text"/> No
Play Area Size (Approx. area)	n/a	-	m2	<input type="text"/> m2
Play Areas Required?	n/a	-	n/	<input type="text"/> N/A <input type="text"/> Yes <input type="text"/> No

Play Area Paving

Not Applicable	n/a	-	✓	<input type="text"/>
Tarmac	50	25	Yr/m2	<input type="text"/> <input type="text"/> <input type="text"/> m2

	Rate	Life	Unit	C/up	Quantity
Rubberoid Surface	75	20	Yr/m2	<input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/> m2
Concrete	50	25	Yr/m2	<input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/> m2
Chippings	20	15	Yr/m2	<input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/> m2
Grass/Earth	20	25	Yr/m2	<input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/> m2
Other	20	25	Yr/m2	<input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/> m2

Play Area Fencing

Not Applicable	n/a	-	✓	<input type="text"/>
None	n/a	-	✓	<input type="text"/>
Timber	35	25	Yr/m	<input type="text"/> <input type="text"/> <input type="text"/> m
Metal	50	25	Yr/m	<input type="text"/> <input type="text"/> <input type="text"/> m
Other	50	25	Yr/m	<input type="text"/> <input type="text"/> <input type="text"/> m

Fixed Play Equipment

1,000	15	Yr/Nr	<input type="text"/> <input type="text"/> <input type="text"/> Nr
-------	----	-------	---

Communal Stores

Communal Stores Provision

Communal Stores Provided?	n/a	-	n/a	<input type="text"/> Yes <input type="text"/> No
Number of Stores Provided Across Site	n/a	-	Nr	<input type="text"/> Nr
Communal Stores Required?	n/a	-	n/a	<input type="text"/> N/A <input type="text"/> Yes <input type="text"/> No

Communal Stores General Condition

Number of Stores for Programmed Replacements	n/a	-	Nr	<input type="text"/> Nr
General Condition Assessment of Stores	n/a	-	n/a	<input type="text"/> Good <input type="text"/> Aver <input type="text"/> Poor
Stores to be Completely Re-built	7,500	-	Nr	<input type="text"/> Nr

Meter Sheds

Meter Shed Provision

Meter Shed Provided?	n/a	-	n/a	<input type="text"/> Yes <input type="text"/> No
Number of Meter Sheds Provided Across Site	n/a	-	Nr	<input type="text"/> Nr

Meter Shed General Condition

Number of Meter Sheds for Programmed Replacements	n/a	-	Nr	<input type="text"/> Nr
General Condition Assessment of Meter Sheds	n/a	-	n/a	<input type="text"/> Good <input type="text"/> Aver <input type="text"/> Poor
Meter Sheds to be Completely Re-built	1,250	-	Nr	<input type="text"/> Nr

Grazing/Open Land

Grazing Land

Animal Grazing Land Provided?	n/a	-	n/a	<input type="text"/> Yes <input type="text"/> No
Animal Grazing Land Adequate/Used?	n/a	-	n/a	<input type="text"/> Yes <input type="text"/> No
Animal Grazing Land Approx. Area	n/a	-	m2	<input type="text"/> m2
Grazing Land Required?	n/a	-	n/a	<input type="text"/> N/A <input type="text"/> Yes <input type="text"/> No

Other Open Land

Other open land on the site?	n/a	-	n/a	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Other Open Land Approx. Area	n/a	-	m2	<input type="text"/> m2	

Telephone

Telephone

Public Telephone Provided?	n/a	-	n/a	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Public Telephone in working order?	n/a	-	n/a	<input type="checkbox"/> N/A	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Replace Public Telephone	500	15	Yr/Nr	<input type="text"/>	<input type="text"/>	<input type="text"/> Nr

Fire Safety

Fire Safety General

Fire Points present on site?	n/a	-	n/a	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Number of Fire Points?	n/a	-	Nr	<input type="text"/> Nr	
Are Fire Points of Adequate Standard?	n/a	-	n/a	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Reason for Inadequacy of Fire Points

None Provided	n/a	-	✓	<input type="checkbox"/>
Inadequate Labelling	n/a	-	✓	<input type="checkbox"/>
Equipment Below Standard	n/a	-	✓	<input type="checkbox"/>
Fire Alarm Below Standard	n/a	-	✓	<input type="checkbox"/>
Equipment Poorly Maintained	n/a	-	✓	<input type="checkbox"/>
Inadequate Equipment	n/a	-	✓	<input type="checkbox"/>
Inadequate Fire Notices	n/a	-	✓	<input type="checkbox"/>
Pitches/Buildings more than 30m from Fire Point?	n/a	-	✓	<input type="checkbox"/> Yes <input type="checkbox"/> No

Fire Fighting Equipment

None	n/a	-	✓				
Extinguisher	500	10	Yr/Nr				Nr
Hose Reel	1,200	15	Yr/Nr				Nr
Fire Blanket	200	10	Yr/Nr				Nr
Fire Alarm System	3,000	15	Yr/Nr				Nr

Caravan Separation

Are caravans able to be at least 6m apart?	n/a	-	n/a	<input type="checkbox"/> Yes	<input type="checkbox"/> No
--	-----	---	-----	------------------------------	-----------------------------

Site Services

Mains Water Supply

Water Supply Provided to Site?	n/a	-	n/a	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Water Supply - Communal Standpipes Provided?	n/a	-	n/a	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Water Supply - Number of Standpipes				<input type="text"/> Nr	
Water Supply - Is Supply Adequate for Site?	n/a	-	n/a	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Estimated cost to provide mains water supply (if none already provided)	Spot Price	-	£		

Rate Life Unit C/up Quantity

Electricity Supply

Electricity Supply - Provided to Site?	n/a	-	n/a	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Electricity Supply - All Cabling underground?	n/a	-	n/a	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Electricity Supply - Is supply Adequately Earthed?	n/a	-	n/a	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Estimated cost to provide electric supply (if none already provided)	Spot Price	-	£		

Gas Supply

Mains Supply Provided?	n/a	-	n/a	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
LPG used on site?	n/a	-	n/a	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
LPG Storage facilities provided?	n/a	-	n/a	<input type="checkbox"/> N/A	<input type="checkbox"/> Yes	<input type="checkbox"/> No
LPG stored in accordance with H&S requirements?	n/a	-	n/a	<input type="checkbox"/> N/A	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Estimated cost to provide mains gas supply (if none already provided)	Spot Price	-	£			

Drainage - Surface Water

Surface Water Drainage

Effectiveness across Site	n/a	-	n/a	<div>Good</div>	<div>Fair</div>	<div>Poor</div>
Storm Water Drains installed?	n/a	-	n/a	<div>Yes</div>	<div>No</div>	
Cost to provide/upgrade surface water drainage system	Spot Price	-	£			

Drainage - Foul Water

Foul Water Drainage

Sewerage Disposal - Underground Drainage System Adequate?	n/a	-	n/a	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Cost to provide/upgrade mains drainage foul water disposal	Spot Price	-	£		

Disposal System

Mains Drainage	n/a	-	✓	<input type="checkbox"/>
Cesspool	n/a	-	✓	<input type="checkbox"/>
Septic Tank	n/a	-	✓	<input type="checkbox"/>
Sewage Treatment Plant	n/a	-	✓	<input type="checkbox"/>
Sewerage Disposal - Heavy Duty/Lockable Manhole Covers?	n/a	-	n/a	<input type="checkbox"/> N/A <input type="checkbox"/> Yes <input type="checkbox"/> No

Chemical System

Chemical Closet Emptying Point Provided?	n/a	-	n/a	<input type="checkbox"/> N/A	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Chemical Closet - Tap Provided?	n/a	-	n/a	<input type="checkbox"/> N/A	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Refuse

Refuse Disposal - Facilities Provided

None	n/a	-	✓	<input type="checkbox"/>
From Pitch	n/a	-	✓	<input type="checkbox"/>

	Rate	Life	Unit	C/up	Quantity
Refuse Skips	n/a	-	✓		
Container	n/a	-	✓		
Scrap Yard	n/a	-	✓		
Other	n/a	-	✓		
Facilities Adequate?	n/a	-	n/a	Yes	No
Skips/Yards/Containers Adequately Screened?	n/a	-	n/a	N/A	Yes No

PITCH

General

General

Pitch Number (pitch identification number)	n/a	-	n/a	Nr
--	-----	---	-----	----

General Description of Pitch Shape

Square	n/a	-	✓	
Oblong	n/a	-	✓	
Irregular	n/a	-	✓	
Random	n/a	-	✓	
Pitch Width (average)	n/a		m	m
Pitch Depth (average)	n/a		m	m
Pitch Approx. Area	n/a	-	m ²	m ²
Is Pitch Size/Shape Generally Adequate?	n/a	-	n/a	Yes No

Contribution to Pitch Problems

Normal Wear and Tear	n/a	-	✓	
Inadequate Maintenance	n/a	-	✓	
Inappropriate Use	n/a	-	✓	
Poor Design/Specification	n/a	-	✓	

Surfaces

Vehicle/Pedestrian Pitch Surface

None	n/a	-	✓	
Tarmac	50	25	Yr/m ²	
Concrete	50	25	Yr/m ²	
Crushed Concrete	50	25	Yr/m ²	
Gravel	20	20	Yr/m ²	
Grass/Earth	50	25	Yr/m ²	
Other	50	25	Yr/m ²	
				m ²

Other Areas within Pitch Boundary?

None/Not Relevant	n/a	-	✓	
Garden/Planting	n/a	-	✓	
Work Area	n/a	-	✓	

	Rate	Life	Unit	C/up	Quantity
Clothes Drying Area	n/a	-	✓		<input type="text"/>
Play Area	n/a	-	✓		<input type="text"/>
Grazing Land	n/a	-	✓		<input type="text"/>

Surfaces Miscellaneous

Footpath Provided to Amenity Block?	n/a	-	n/a	<input type="text"/> Yes	<input type="text"/> No
Adequate Surface Water Drainage from Pitch?	n/a	-	n/a	<input type="text"/> Yes	<input type="text"/> No
Does Pitch suffer from natural flooding?	n/a	-	n/a	<input type="text"/> Yes	<input type="text"/> No

Pitch Boundary

Pitch Boundary Fencing

None	n/a	-	✓		<input type="text"/>		
Chain link	25	20	Yr/m	<input type="text"/>	<input type="text"/>	<input type="text"/>	m
Post & wire	22	20	Yr/m	<input type="text"/>	<input type="text"/>	<input type="text"/>	m
Timber panel	35	20	Yr/m	<input type="text"/>	<input type="text"/>	<input type="text"/>	m
Timber ranch style	35	20	Yr/m	<input type="text"/>	<input type="text"/>	<input type="text"/>	m
Chestnut Paling	25	20	Yr/m	<input type="text"/>	<input type="text"/>	<input type="text"/>	m
Galvanised Steel Paling	50	30	Yr/m	<input type="text"/>	<input type="text"/>	<input type="text"/>	m
Hedges	30	30	Yr/m	<input type="text"/>	<input type="text"/>	<input type="text"/>	m
Other	55	20	Yr/m	<input type="text"/>	<input type="text"/>	<input type="text"/>	m

Pitch Boundary Height

Less than 1m	n/a	-	✓	<input type="text"/>
1m to 1.5m	n/a	-	✓	<input type="text"/>
Greater than 1.5m	n/a	-	✓	<input type="text"/>

Pitch Boundary Walling

None	n/a	-	✓		<input type="text"/>		
Brick	50	50	Yr/m2	<input type="text"/>	<input type="text"/>	<input type="text"/>	m2
Block	30	50	Yr/m2	<input type="text"/>	<input type="text"/>	<input type="text"/>	m2
Concrete Panel	30	50	Yr/m2	<input type="text"/>	<input type="text"/>	<input type="text"/>	m2
Stone	80	60	Yr/m2	<input type="text"/>	<input type="text"/>	<input type="text"/>	m2
Other	60	50	Yr/m2	<input type="text"/>	<input type="text"/>	<input type="text"/>	m2

Pitch Gates

None	n/a	-	✓		<input type="text"/>		
Timber	150	20	Yr/Nr	<input type="text"/>	<input type="text"/>	<input type="text"/>	Nr
Metal	250	30	Yr/Nr	<input type="text"/>	<input type="text"/>	<input type="text"/>	Nr
Other	200	20	Yr/Nr	<input type="text"/>	<input type="text"/>	<input type="text"/>	Nr

Amenity Block - General

Amenity Block Type

None	n/a	-	✓	<input type="text"/>	Skip Amenity Block Section
Permanent	n/a	-	✓	<input type="text"/>	
Temporary	n/a	-	✓	<input type="text"/>	

Amenity Block Construction

Brick/Block with Pitched Roof	n/a	-	✓	<input type="text"/>
Brick/Block with Flat Roof	n/a	-	✓	<input type="text"/>
Other with Pitched Roof	n/a	-	✓	<input type="text"/>
Other with Flat Roof	n/a	-	✓	<input type="text"/>

Amenity Block General Information

Total Gross Internal Floor Area (approx.)	n/a	-	n/a	<input type="text"/> m2
Number of habitable rooms	n/a	-	n/a	<input type="text"/> Nr
For exclusive use of resident?	n/a	-	n/a	<input type="text"/> Yes <input type="text"/> No
Building fit for purpose?	n/a	-	n/a	<input type="text"/> Yes <input type="text"/> No
General Condition Assessment of Amenity Blocks	n/a	-	n/a	<input type="text"/> Good <input type="text"/> Aver <input type="text"/> Poor
Disabled Access provided?	n/a	-	n/a	<input type="text"/> Yes <input type="text"/> No

Vicinity of Amenity Block

Vermin Problems evident?	n/a	-	n/a	<input type="text"/> Yes <input type="text"/> No
--------------------------	-----	---	-----	--

Contribution to Building Problems

Normal Wear and Tear	n/a	-	✓	<input type="text"/>
Inadequate Maintenance	n/a	-	✓	<input type="text"/>
Inappropriate Use	n/a	-	✓	<input type="text"/>
Poor Design/Specification	n/a	-	✓	<input type="text"/>

Amenity Building - Re-build/Refurbish

Amentiy Building General Replacement

Completely Re-build Entire Amentiy Block	10,000	-	✓	<input type="text"/> Skip next section
Refurbish Internal of Small Sized Amentiy Block	2,000	-	✓	<input type="text"/> Skip Internal section
Refurbish Internal of Average Sized Amentiy Block	3,500	-	✓	<input type="text"/> Skip Internal section
Refurbish Internal of Large Sized Amentiy Block	4,500	-	✓	<input type="text"/> Skip Internal section

Amenity Building - External

Roof

Pitched	30	40	Yr/m2	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/> m2
Flat	30	20	Yr/m2	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/> m2
Mansard	30	40	Yr/m2	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/> m2
Other	30	40	Yr/m2	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/> m2

Fascia/soffit/barge

17	30	Yr/m	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/> m
----	----	------	----------------------	----------------------	----------------------	------------------------

Rainwater goods

10	20	Yr/m	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/> m
----	----	------	----------------------	----------------------	----------------------	------------------------

Soil and Vent Pipe

26	30	Yr/m	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/> m
----	----	------	----------------------	----------------------	----------------------	------------------------

External doors

300	25	Yr/Nr	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/> Nr
-----	----	-------	----------------------	----------------------	----------------------	-------------------------

	Rate	Life	Unit	C/up	Quantity
External Walls	26	25	Yr/m2	<input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/> m2
Windows	450	25	Yr/No	<input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/> Nr
Electrical - External					
Light provided at entrance?	n/a	-	n/a	<input type="text"/>	<input type="text"/> Yes <input type="text"/> No
Replace light at entrance	200	25	Yr/Nr	<input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/> Nr
External electrical outlet provided?	n/a	-	n/a	<input type="text"/>	<input type="text"/> Yes <input type="text"/> No
External Decorations					
General External Decorative Quality?	n/a	-	n/a	<input type="text"/>	<input type="text"/> Good <input type="text"/> Aver <input type="text"/> Poor

Amenity Building - Internal

Kitchen Fittings					
None/Not applicable	-	-	√	<input type="text"/>	
Fully fitted	1,800	15	Yr/Nr	<input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/> Nr
Stainless Steel Sink Unit Only	400	15	Yr/Nr	<input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/> Nr
Cooker Provision					
Cooker Provided?	n/a	-	n/a	<input type="text"/>	<input type="text"/> N/A <input type="text"/> Yes <input type="text"/> No
Replace cooker	750	15	Yr/Nr	<input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/> Nr
Kitchen Miscellaneous					
Layout of Kitchen safe/satisfactory?	n/a	-	n/a	<input type="text"/>	<input type="text"/> N/A <input type="text"/> Yes <input type="text"/> No
Plumbing for washing machine available?	n/a	-	n/a	<input type="text"/>	<input type="text"/> N/A <input type="text"/> Yes <input type="text"/> No
Bathroom/Wash Area					
None/Not applicable	-	-	√	<input type="text"/>	
Vitreous China W.C.	350	20	Yr/Nr	<input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/> Nr
Stainless Steel W.C.	350	20	Yr/Nr	<input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/> Nr
Bath	350	20	Yr/Nr	<input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/> Nr
Shower	400	15	Yr/Nr	<input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/> Nr
Vitreous China Wash Hand Basin	250	20	Yr/Nr	<input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/> Nr
Stainless Steel Wash Hand Basin	250	20	Yr/Nr	<input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/> Nr
Bathroom/Wash Area Miscellaneous					
Bathroom and WC separate	n/a	-	n/a	<input type="text"/>	<input type="text"/> N/A <input type="text"/> Yes <input type="text"/> No
Direct W.C. Access from kitchen?	n/a	-	n/a	<input type="text"/>	<input type="text"/> N/A <input type="text"/> Yes <input type="text"/> No
Direct W.C. Access from outside?	n/a	-	n/a	<input type="text"/>	<input type="text"/> N/A <input type="text"/> Yes <input type="text"/> No
Heating/Water Heating - General Information					
Central heating extent	n/a	-	n/a	<input type="text"/>	<input type="text"/> None <input type="text"/> Partial <input type="text"/> Full
Number of unheated rooms	n/a	-	Nr	<input type="text"/>	<input type="text"/> Nr
Water heating facilities adequate?	n/a	-	n/a	<input type="text"/>	<input type="text"/> Yes <input type="text"/> No

Central Heating System (excluding boiler)

None/Not Applicable	n/a	-	✓				
Radiator system (wet system)	1,300	30	Yr				
Storage heaters	1,000	30	Yr				
Warm air system	1,300	30	Yr				
Other	1,300	30	Yr				

Central Heating Boiler

None/Not Applicable	n/a	-	✓				
Central heating boiler	850	15	Yr				

Room Heating

None/Not Applicable	n/a	-	✓				
Room heaters	280	15	Yr/Nr				Nr

Water Heating

None/Not Applicable	n/a	-	✓				
Water Heating	550	15	Yr/Nr				Nr

Electrical Installation

Replace electrical wiring (excluding consumer unit)	1,000	25	Yr				
Consumer unit	350	25	Yr				

Services

Underground drainage to pitch?	n/a	-	n/a	Yes	No		
Mains water supply to pitch?	n/a	-	n/a	Yes	No		
Water Supply metered to pitch?	n/a	-	n/a	Yes	No		
Individually metered electricity supply to pitch?	n/a	-	n/a	Yes	No		
Electricity cabling all securely underground?	n/a	-	n/a	Yes	No		
Any signs of unauthorised connections?	n/a	-	n/a	Yes	No		

Services - Type of Meter

None - Not to individual pitch	n/a	-	✓				
Pre-Paid Card	n/a	-	✓				
Coin	n/a	-	✓				
Other	n/a	-	✓				

Internal Doors

125	25	Yr/Nr					Nr
-----	----	-------	--	--	--	--	----

Floor Finish

20	10	Yr/m2					m2
----	----	-------	--	--	--	--	----

Extract fan

Extract fan - None	n/a	-	✓				
Extract fan	70	10	Yr/Nr				Nr

Internal Decorations

General Internal Decorative Quality?	n/a	-	n/a	Good	Aver	Poor	
--------------------------------------	-----	---	-----	------	------	------	--

SITE BUILDINGS

General

General

Building Number (building identification number) n/a - n/a Nr

Type of Building

Site Communal Amenity Block	n/a	-	✓	<input type="text"/>
Community Building	n/a	-	✓	<input type="text"/>
Residential Wardens Unit	n/a	-	✓	<input type="text"/>
Non-Residential Wardens Unit	n/a	-	✓	<input type="text"/>
Pre-School Facility/Education Unit	n/a	-	✓	<input type="text"/>
Caretakers Office/Store	n/a	-	✓	<input type="text"/>
Laundry Room	n/a	-	✓	<input type="text"/>
Other	n/a	-	✓	<input type="text"/>

Building Type

None	n/a	-	✓	<input type="text"/>
Permanent	n/a	-	✓	<input type="text"/>
Temporary	n/a	-	✓	<input type="text"/>

Configuration

Detached	n/a	-	✓	<input type="text"/>
Semi-Detached	n/a	-	✓	<input type="text"/>
Terraced	n/a	-	✓	<input type="text"/>

Building Construction

Brick/Block with Pitched Roof	n/a	-	✓	<input type="text"/>
Brick/Block with Flat Roof	n/a	-	✓	<input type="text"/>
Other with Pitched Roof	n/a	-	✓	<input type="text"/>
Other with Flat Roof	n/a	-	✓	<input type="text"/>

Building General Information

Total Gross Internal Floor Area (approx.)	n/a	-	n/a	<input type="text"/> m2
Number of habitable rooms	n/a	-	n/a	<input type="text"/> Nr
Building fit for purpose?	n/a	-	n/a	<input type="text"/> Yes <input type="text"/> No
General Condition Assessment	n/a	-	n/a	<input type="text"/> Good <input type="text"/> Aver <input type="text"/> Poor
Disabled Access provided?	n/a	-	n/a	<input type="text"/> Yes <input type="text"/> No

Vicinity of Building

Vermin Problems evident?	n/a	-	n/a	<input type="text"/> Yes <input type="text"/> No
--------------------------	-----	---	-----	--

Contribution to Building Problems

Normal Wear and Tear	n/a	-	✓	<input type="text"/>
Inadequate Maintenance	n/a	-	✓	<input type="text"/>
Inappropriate Use	n/a	-	✓	<input type="text"/>
Poor Design/Specification	n/a	-	✓	<input type="text"/>

Rate Life Unit C/up Quantity

Building - General

Building General Replacement

Completely Re-build Entire Building £250 - ✓/m2 m2
Skip next section

Refurbish Building Internally Spot Price - ✓/£ £
Skip Internal section

Building - External

Roof

Pitched	30	40	Yr/m2	<input type="text"/>	<input type="text"/>	<input type="text"/>	m2
Flat	30	20	Yr/m2	<input type="text"/>	<input type="text"/>	<input type="text"/>	m2
Mansard	30	40	Yr/m2	<input type="text"/>	<input type="text"/>	<input type="text"/>	m2
Other	30	40	Yr/m2	<input type="text"/>	<input type="text"/>	<input type="text"/>	m2

Fascia/soffit/bargeboard 17 30 Yr/m m

Rainwater goods 10 20 Yr/m m

Soil and Vent Pipe 26 30 Yr/m m

External doors 300 25 Yr/Nr Nr

External Walls 26 25 Yr/m2 m2

Windows 450 25 Yr/Nr Nr

Electrical - External

Light provided at entrance? n/a - n/a Yes No

Replace light at entrance 200 25 Yr/Nr Nr

External electrical outlet provided? n/a - n/a Yes No

External Decorations

General External Decorative Quality? n/a - n/a Good Aver Poor

Building - Internal

Kitchen Fittings

None/Not applicable - - ✓

Fully fitted 1,800 15 Yr/Nr Nr

Stainless Steel Sink Unit Only 400 15 Yr/Nr Nr

Kitchen Miscellaneous

Layout of Kitchen safe/satisfactory? n/a - n/a N/A Yes No

Plumbing for washing machine available? n/a - n/a N/A Yes No

	Rate	Life	Unit	C/up	Quantity		
Bathroom/Wash Area							
None/Not applicable	-	-	✓				
Vitreous China W.C.	350	20	Yr/Nr				Nr
Stainless Steel W.C.	350	20	Yr/Nr				Nr
Bath	350	20	Yr/Nr				Nr
Shower	400	15	Yr/Nr				Nr
Vitreous China Wash Hand Basin	250	20	Yr/Nr				Nr
Stainless Steel Wash Hand Basin	250	20	Yr/Nr				Nr
Bathroom/Wash Area Miscellaneous							
Bathroom and WC separate	n/a	-	n/a		N/A	Yes	No
Direct W.C. Access from kitchen?	n/a	-	n/a		N/A	Yes	No
Direct W.C. Access from outside?	n/a	-	n/a		N/A	Yes	No
Heating/Water Heating - General Information							
Central heating extent	n/a	-	n/a		None	Partial	Full
Number of unheated rooms	n/a	-	Yr/Nr		Nr		
Water heating facilities adequate?	n/a	-	n/a		Yes	No	
Central Heating System							
None/Not Applicable	n/a	-	✓				
Radiator system (wet system)	1,300	30	Yr				
Storage heaters	1,000	30	Yr				
Warm air system	1,300	30	Yr				
Other	1,300	30	Yr				
Central Heating Boiler							
None/Not Applicable	n/a	-	✓				
Central heating boiler	850	15	Yr				
Room Heating							
None/Not Applicable	n/a	-	✓				
Room heaters	280	15	Yr/Nr				Nr
Water Heating							
None/Not Applicable	n/a	-	✓				
Water Heating	550	15	Yr/Nr				Nr
Electrical Installation							
Replace electrical wiring (excluding consumer unit)	1,000	25	Yr				
Consumer unit	350	25	Yr				
Electrical installation generally adequate	n/a	-	✓				
Provide more socket outlets	n/a	-	✓				
Internal lighting satisfactory?	n/a	-	n/a		Yes	No	

	Rate	Life	Unit	C/up	Quantity
<i>Internal Doors</i>	125	25	Yr/Nr	<input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/> Nr
<i>Floor Finish</i>	20	10	Yr/m2	<input type="text"/>	<input type="text"/> <input type="text"/> <input type="text"/> m2
<i>Internal Decorations</i>					
General Internal Decorative Quality?	n/a	-	n/a	<input type="text"/> Good	<input type="text"/> Aver <input type="text"/> Poor

ENVIRONMENT

Location

Site Location

City Centre/Urban	n/a	-	✓	<input type="text"/>
Suburban Residential	n/a	-	✓	<input type="text"/>
Urban Fringes	n/a	-	✓	<input type="text"/>
Rural Fringes	n/a	-	✓	<input type="text"/>
Rural	n/a	-	✓	<input type="text"/>

Previous Land Use of Site

Not Known	n/a	-	✓	<input type="text"/>
Industrial	n/a	-	✓	<input type="text"/>
Commercial	n/a	-	✓	<input type="text"/>
Rural/Working Farm	n/a	-	✓	<input type="text"/>
Refuse Tip	n/a	-	✓	<input type="text"/>
Other	n/a	-	✓	<input type="text"/>

Adjacent Land Use

Residential	n/a	-	✓	<input type="text"/>
Mixed Residential	n/a	-	✓	<input type="text"/>
Industrial	n/a	-	✓	<input type="text"/>
Commercial	n/a	-	✓	<input type="text"/>
Other	n/a	-	✓	<input type="text"/>
Rural/Working Farm	n/a	-	✓	<input type="text"/>

Location to Main Amenities - Public Transport

Less than 1 km	n/a	-	✓	<input type="text"/>
1 km to 5km	n/a	-	✓	<input type="text"/>
More than 5km	n/a	-	✓	<input type="text"/>

Location to Main Amenities - Post Office

Less than 1 km	n/a	-	✓	<input type="text"/>
1 km to 5km	n/a	-	✓	<input type="text"/>
More than 5km	n/a	-	✓	<input type="text"/>

Location to Main Amenities - Primary School

Less than 1 km	n/a	-	✓	<input type="text"/>
1 km to 5km	n/a	-	✓	<input type="text"/>
More than 5km	n/a	-	✓	<input type="text"/>

	Rate	Life	Unit	C/up	Quantity
Problems in Area (Enter value 1 to 5)					
Litter/Rubbish/Dumping	n/a	-	1 to 5		<input type="text"/>
Graffiti	n/a	-	1 to 5		<input type="text"/>
Vandalism	n/a	-	1 to 5		<input type="text"/>
Dog Excrement	n/a	-	1 to 5		<input type="text"/>
Vacant/Derelict buildings	n/a	-	1 to 5		<input type="text"/>
Intrusive Industry	n/a	-	1 to 5		<input type="text"/>
Non-conforming Land Use	n/a	-	1 to 5		<input type="text"/>
Ambient Air Quality	n/a	-	1 to 5		<input type="text"/>
Heavy Traffic	n/a	-	1 to 5		<input type="text"/>
Intrusion from Motorways	n/a	-	1 to 5		<input type="text"/>
Railway/Aircraft Noise	n/a	-	1 to 5		<input type="text"/>
Nuisance from Parking	n/a	-	1 to 5		<input type="text"/>
Scruffy gardens/landscape	n/a	-	1 to 5		<input type="text"/>
Direct Cause of Nuisance and % of Site Affected by Nuisance					
None	n/a	-	✓/ %	<input type="text"/>	<input type="text"/> %
Motorway/Major Road	n/a	-	✓/ %	<input type="text"/>	<input type="text"/> %
Railway Line	n/a	-	✓/ %	<input type="text"/>	<input type="text"/> %
Industrial/Commercial Activity	n/a	-	✓/ %	<input type="text"/>	<input type="text"/> %
Sewage Works	n/a	-	✓/ %	<input type="text"/>	<input type="text"/> %
Rubbish Tip	n/a	-	✓/ %	<input type="text"/>	<input type="text"/> %
Quarry	n/a	-	✓/ %	<input type="text"/>	<input type="text"/> %
Visual Quality of Local Area					
Excellent	n/a	-	✓	<input type="text"/>	
Very Good	n/a	-	✓	<input type="text"/>	
Good	n/a	-	✓	<input type="text"/>	
Average	n/a	-	✓	<input type="text"/>	
Poor	n/a	-	✓	<input type="text"/>	
Very Poor	n/a	-	✓	<input type="text"/>	
Unacceptable	n/a	-	✓	<input type="text"/>	
How does quality of site compare with local area?					
Better	n/a	-	✓	<input type="text"/>	
Same	n/a	-	✓	<input type="text"/>	
Worse	n/a	-	✓	<input type="text"/>	
Perimeter Screening					
Does site have perimeter screening?	n/a	-	n/a	<input type="text"/> Yes	<input type="text"/> No

	Rate	Life	Unit	C/up	Quantity
Site Access					
<i>Site Access</i>					
Private Access Road	n/a	-	✓		<input type="text"/>
Public Highway	n/a	-	✓		<input type="text"/>
Site Access - Safe Access?	n/a	-	n/a	<input type="text"/> Yes	<input type="text"/> No
Site Access sufficiently wide (5m)?	n/a	-	n/a	<input type="text"/> Yes	<input type="text"/> No
<i>Private Access Road Surface</i>					
Tarmac	50	25	Yr/m2	<input type="text"/>	<input type="text"/> m2
Concrete	50	25	Yr/m2	<input type="text"/>	<input type="text"/> m2
Crushed Concrete	50	25	Yr/m2	<input type="text"/>	<input type="text"/> m2
Gravel	20	20	Yr/m2	<input type="text"/>	<input type="text"/> m2
Grass/Earth	50	25	Yr/m2	<input type="text"/>	<input type="text"/> m2
Other	50	25	Yr/m2	<input type="text"/>	<input type="text"/> m2
<i>Signage</i>					
Adequate Signage?	n/a	-	n/a	<input type="text"/> Yes	<input type="text"/> No
IMPROVEMENTS					
Site Layout satisfactory?					
Redesign Site Layout	Spot Price	n/a	£	<input type="text"/> £	
External Signage to Site					
Provide Additional External Signage (estimate number of signs required)	250	20	Nr	<input type="text"/> Nr	
Entrance Barrier					
Provide Entrance Barrier (no. of barriers required)	3,000	20	Nr	<input type="text"/> Nr	
Traffic Calming Measures					
Introduce Traffic Calming Measures to Site Roads	1,500	25	✓	<input type="text"/>	
Site Lighting					
Provide Site Lighting (estimate number of high level lights required)	750	20	Nr	<input type="text"/> Nr	
Fire Safety					
Provide Fire Alarm System to Site	5,000	15	✓	<input type="text"/>	
Provide additional fire fighting equipment	500	10	✓	<input type="text"/>	
Amenity & Community Buildings - Provision					
Provide additional amenity buildings (estimate number of amenity/other buildings required)	10,000	30	Nr	<input type="text"/> Nr	

THE PROJECT ADVISORY GROUP

Chairman:

Professor Eric Sunderland

Former Chairman
Local Government Boundary Commission
for Wales

Former Chairman
Commission on Local Government Electoral
Agreement in Wales

Consultants:

Martin Gladwin

Plus Property Solutions

Pat Niner

Centre for Urban and Regional Studies
School of Public Policy
University of Birmingham

Members:

Chris Johnson

The Community Law Partnership

Sue Finch

Welsh Local Government Association

Helga Karlson

Flintshire County Council

Joy Kent

Cymorth Cymru

Catherine Phelps

Gwent Police

Tracey Sutton

Cymorth Cymru and Welsh Women's Aid

Andrew Ryder

Gypsy Traveller Law Reform Coalition

Tim Wilson

Cardiff Gypsy and Traveller Project

Welsh Assembly Government:

Dr Ian Thomas

Local Government Policy

Shyam Vining

Local Government Policy

Lisa Hughes

Local Government Policy

Carol – Anne Mooney

Strategic Equality and Diversity Unit

Rhiannon Caunt

Statistical Directorate

Julian Dawkins

Estates Division

Mike Harmer

Housing Division

Cathryn Evans

Housing Division

Peter Roberts

Planning Division

Henry Small

Statistical Directorate