

My Ref: Scrutiny/Correspondence/Cllr Jenkins

15th November 2021

Councillor Lynda Thorne  
Cabinet Member for Housing & Communities  
*Sent via e-mail*



Dear Cllr Thorne,

**COMMUNITY & ADULT SERVICES SCRUTINY COMMITTEE – 10 NOV 2021 – UPDATED  
GYPSY & TRAVELLER ACCOMODATION ASSESSMENT -**

Please accept my thanks, on behalf of Committee, for facilitating our consideration of the updated Gypsy & Traveller Accommodation Assessment (GTAA). As you are aware, the findings from this Assessment (if agreed by Welsh Government) will be used to inform the replacement Local Development Plan (RLDP), which spans a fifteen-year period. During our consideration, a number of concerns were raised which are set out in this letter.

Though it is recognised that this Assessment is largely defined by Welsh Government guidance, given the Assessment's importance, the timescale it covers, and the issue of liability detailed later in the letter, I strongly urge that the concerns and comments detailed below are raised with Welsh Government Ministers for their attention, and to initiate discussion around the prescribed Assessment's overall robustness.

**GTAA Methodology**

During the meeting, we explored the Assessment's considerable reliance on the survey results when determining identified need. In particular, we sought clarity on whether 122 responses, is in fact a robust result to facilitate such significant decisions. In response, our attention was drawn to the size of the Gypsy and Traveller population in Cardiff, and that as a community they are quite hard to engage with. With this in mind, officers are content that the response rate is a good result.

As a committee, we acknowledge that the size of the Gypsy & Traveller community in Cardiff is relatively small and this in turn provides some reasoning as to why the GTAA's findings are largely based on survey findings. However, given the importance of the Assessment and the timeframe it covers, this strong reliance on a survey does raise questions in relation to its robustness and validity and if in fact, the survey results could be considered as empirical

evidence. Having carefully considered this, I am of the view that 122 survey responses cannot reasonably be considered as empirical evidence to largely determine population projections over a 15 year period.

In line with this, the population projections used to inform the overall RLDP are provided by Welsh Government. However in contrast, it appears the data provided for this Assessment (which is used to inform the RLDP) is largely supplied by the Council, which is a notable juxtaposition. This in itself, signals a significant responsibility for the Council which in turn, also raises the issue of liability for the Council and emphasises the need to ensure that the findings provided in the Assessment are accurate and robust. With liability in mind, we wish to stress the need to ensure extra precautions are utilised at every possible opportunity when conducting this Assessment. In addition, we also wish to **request** clarity on the Council's exact liability for the GTAA, particularly if projections are inaccurate or the identified need is not met.

Given the number of Gypsy & Travellers who reside in bricks and mortar, we questioned why there was no representation from Housing Associations on the Steering Group, and we were advised such individuals are represented on the Group by the Council and Gypsy & Traveller Wales membership. Further to this, we also sought clarity on the role of South Wales Police within the Group, and it was confirmed their purpose was due to their links with the community, and their ability to help spread the word of the survey to increase engagement.

### **Determining Sites for the Identified Need**

During the meeting we explored how many sites would be needed to accommodate the identified need for 115 extra pitches. We were advised there is ongoing consideration in this matter, however, to address this need, it may be that one large site is developed or increased capacity is sought on an existing site. In addition, it was also confirmed that the identified need for 115 extra pitches is required to be in Cardiff, however, in line with the GTAA findings, consideration is being given toward developing a regional transit site for the community. During the discussions it was unclear if determining a site location would largely depend on Planning law and we wish to **request** further information and clarity toward the full process for identifying potential sites.

In relation to funding to meet this additional need, we note a Welsh Government grant will be made available for delivering additional pitches, but not for buying land, and work is ongoing regarding the Council's cost projections for this additional housing need.

Although it is recognised the purpose of the GTAA is to identify Gypsy & Traveller's Accommodation need and to identify numbers, we also discussed the importance of recognising the needs of other communities and we explored if there is a statutory reason why the impact and needs of wider communities is not included in the Assessment. We were advised as the focus of this Assessment is to determine numbers, and due to the locations of additional sites currently being unknown, it presents difficulties in this consideration being taken into account.

It was further confirmed that the next stage regarding proposed options for site/pitch location will include wider consideration toward other communities. Nevertheless, given the importance of this Assessment for all of Cardiff's communities', the timeframe it relates to and the potential implications surrounding liability already noted in the letter, I feel it is worthwhile to stress the importance that this Assessment is conducted through an integrated approach, with broad consideration which includes the potential impact on a city-wide level, at every possible opportunity.

During the meeting, we were advised that the short-term pitches identified in the 2016 GTAA have not yet been provided as a suitable site is yet to be identified. In line with this, we wish to **request** clarity on if the identified need of 115 additional pitches found in this Assessment, is in addition to the 72 pitches identified in the 2016 GTAA, or if the 115 pitches are inclusive of the 2016 assessment.

We note a Cabinet Report detailing the strategy to deliver the 115 extra pitches is to be expected in September 2022. Given we were informed a detailed assessment has been ongoing regarding site allocation since 2016, we wish to **request** insight into the potential location of pitches / sites. Although we would like this information shared with us publicly owing to the importance of democratic transparency, we will accept this information being shared on a confidential basis if required.

Finally, Members wished to advise that at times, some of the answers provided at the meeting proved equivocal which stimulated concern and lack of confidence amongst Members in the answers they received.

To confirm, a response to this letter is requested along with the following information:

- Information on the Council's liability for the GTAA, particularly if projections are inaccurate or the identified need is not met.

- Clarity on if the identified need of 115 additional pitches found in this Assessment, is in addition to the 72 pitches identified in the 2016 GTAA, or if the 115 pitches are inclusive of the 2016 assessment.
- Clarity on the full process for identifying potential sites / allocation of pitches.
- Insight into the potential location of sites / pitches to address the identified need detailed in this Assessment.

Yours,



**COUNCILLOR SHAUN JENKINS**

**Chairman - Community & Adult Services Scrutiny Committee**

cc. Cllr Caro Wild, Cabinet Member for Strategic Planning & Transport  
Sarah McGill, Corporate Director, People & Communities  
Jane Thomas, Director, Adults, Housing & Communities  
Andrew Gregory, Director, Planning, Transport & Environment  
Stuart Williams, Group Leader, Policy  
Jo Watkins, Cabinet Business  
Leaders of the Opposition  
Members of the Community & Adult Services Scrutiny Committee  
Tim Gordon, Head of Communications & External Relations