

GRT 06

Ymgynghoriad ar ddarparu safleoedd ar gyfer cymunedau Sipsiwn, Roma a Theithwyr
Consultation on the provision of sites for Gypsy, Roma and Travellers
Ymateb gan: Awdurdod Parc Cenedlaethol Eryri
Response from: Snowdonia National Park Authority

Snowdonia National Park Authority welcomes the opportunity to contribute to the Inquiry into the provision of sites for Gypsy, Roma and Travellers.

Background from Snowdonia National Park Authority perspective

The Housing (Wales) Act 2014 places a legal duty upon local authorities to ensure that the accommodation needs of Gypsies and Travellers are properly assessed and that the identified need for pitches is met. Snowdonia National Park Authority is not a local authority but as a local planning Authority it does have a role to play in ensuring that any need identified in a GTANA should be met in the Authority's Local Development Plan.

Both Gwynedd and Conwy Local Authorities are responsible for undertaking GTANA for the Snowdonia National Park planning authority area. The findings of Gwynedd and Conwy's GTANA is a key consideration in the plan making, monitoring and review process for the authority's development plan and forms an important part of the development plan evidence base.

Gypsy and traveller accommodation needs assessments 2013, 2016 and 2022

Over the years, Snowdonia National Park Authority has been sitting on Gypsy and Traveller Accommodation Needs Assessment (GTANA) steering groups to identify any needs within the National Park. A North West Wales regional GTANA report published in 2013 identified the need for permanent pitches across the North Wales region. The 2013 study found a need for 3 residential pitches to cope with demand from Conwy and a suitable site of 4 pitches was progressed at Bangor Road in Conwy, adjoining the National Park boundary. There was no evidence of need in the GTANA to allocate a site within the National Park area. Gwynedd and Conwy prepared a Gypsy and Traveller Accommodation Needs Assessments on local authority level in 2016. The GTANA did not identify the need for a site within the National Park and the Eryri LDP contained a criteria based policy to judge proposals to meet future or unexpected need.

In May 2021, arc4 were commissioned to assist Gwynedd and Ynys Mon Councils to prepare a Gypsy and Travellers Accommodation Assessment to inform local housing strategies and Gypsy and Traveller site provision policies in Development Plans. The GTANA has been carried out in accordance with the methodology set out in the Welsh Government's Undertaking Gypsy and Traveller Accommodation Assessment. Again the GTANA did not identify the need for a site within the National Park.

In assessing the need for a site, the Authority also takes into consideration other historical information sources relating to the National Park area including the number of planning applications and their outcomes and the number of appeals within the National Park. The Eryri Local Plan which was adopted in 1999 contained a policy on Gypsy Sites, but there had not been a single planning application or a planning appeal for a Gypsy Site during the Eryri Local Plan period and as a result the policy had not been used. The Eryri Local Development Plan was adopted in 2011 and revised in 2019 but again no planning applications received for a Gypsy and Travellers site or any planning enforcement cases relating to a Gypsy and Traveller Site.

With regards to the detailed questions relating to the inquiry, SNPA do not have the experience or expertise to comment on the individual questions but have the following observations to make.

Gwynedd and Conwy local authorities would be in a better position to comment on how successfully they've been in working with the Gypsies, Roma and Traveller communities during the GTANA process. From our understanding the fieldworkers for Gwynedd and Mon GTANA adopted a research strategy to directly engage as many members of the Gypsy and Traveller community in the study area as possible through:

- Liaison with key stakeholders and support organisations;
- A census of sites reviewing total number of pitches, number of pitches occupied and vacant, number of caravans and total number of households; and
- Interviews with Gypsies and Travellers on authorised sites, unauthorised sites and living in bricks and mortar accommodation, using the questionnaire recommended in Government Guidance.

Local Development Plan preparation

With regards to the Local Development Plan, the GTANAs is a key evidence base for local planning authorities to assess the level of additional Gypsy and Traveller accommodation provision that is required when preparing their development plans.

The Local Development Plan's Community Involvement Scheme sets out how individuals, communities and organisations can become involved in the Local Development Plan process. It is important that local planning authorities are aware which organisations best represent the Gypsies and Travellers communities at a local and national level to raise the communities awareness about the development plan process. If there was evidence of need identified in the GTANA it is important that Gypsy and traveller communities become involved in the local development plan process and submit potential sites to be considered as part of the plan preparation process.

There is a great challenge to find ways to engage meaningfully with hard to reach groups on issues that routinely matter a great deal to them at a point at which there is greater influence on the potential outcomes in the development plan. It is a challenge that will require additional resources that is not currently available at a national or local level.

Implementation and Monitoring

We are not in a position to comment on GTANA implementation and monitoring across Wales. Both Gwynedd and Conwy who are the local authorities for the Snowdonia National Park area have undertaken a recent GTANA. We understand that a GTANA should be undertaken at least every 5 years and that there is flexibility to undertake GTANAs more frequently if a material change in the level of need in the area has been identified. We are not aware of a formal process to monitor and review GTANAs. Again, Gwynedd and Conwy local authorities would be in a better position to comment on this aspect.

The National Park Authority reports annually on any progress made by both Gwynedd and Conwy on their GTANA in the Local Development Plan annual monitoring report. If a material change in the level of need in the National Park area was identified through a GTANA this could result in the review of the authority's development plan in order to address any shortfalls in site provision through the planning process. The LDP Annual Monitoring Report would also report on any planning applications for Gypsies, Roma and Traveller sites within the National Park area.

Strategic Development Plans and Regional GTANA

There is benefit from working collaboratively in order to prepare a GTANA as Gypsy and Traveller populations regularly move across administrative boundaries. A regional GTANA could help to deliver a better understanding of travelling patterns and accommodation needs across local authorities. This could result in a common approach and consistency across the area in identifying need and allocating suitable Gypsy and Traveller sites in development plans. Working across a region may also result in cost savings and improve the data available to assess need. A Corporate Joint Committee is currently being set up to drive forward the preparation of a Strategic Development Plan (SDP) across north Wales. The Strategic Development Plans are a vehicle for cross boundary working on Gypsy and Traveller provision. An assessment undertaken on a regional basis could provide benefits in terms of consistency in approach across local authorities to identifying need and sites for the Gypsy and Traveller community.