

<b>Planning</b>	<b>Cymorth</b>
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<b>Wales</b>	<b>Cymru</b>

**Collective consultation response to the  
Welsh Assembly Government on:  
*Draft Circular (Land Use) Planning for Gypsy  
and Traveller Caravan Sites in Wales***

**Submitted on behalf of Gypsy and Traveller  
communities in Wales by Planning Aid Wales**

**July 2007**

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- 1) Consultation pack
- 2) Consultation methodology appraisal

## 1. Introduction

1. Planning Aid Wales has been commissioned by the Welsh Assembly Government to help identify the views and opinions of Gypsies and Travellers on the *Draft Circular (Land Use) Planning for Gypsy and Traveller Caravan Sites in Wales*. In undertaking this work, Planning Aid Wales has acted as an independent intermediary between this under-represented group and a national planning policy making process in which they would not normally get involved.

2. The draft circular follows a comprehensive government review of service provision for Gypsy and Traveller groups (undertaken in 2003), and recommendations arising from subsequently commissioned research into their accommodation needs (Niner report, 2006).

3. The draft planning circular issued for consultation on 13<sup>th</sup> December 2006, with comments invited by 30<sup>th</sup> March 2007. Planning Aid Wales was asked in late February to develop a brief and methodology for undertaking proactive consultation work with the target community. It was agreed that given the extremely tight timescale and the challenge of engaging with an under-represented group, the consultation period could be extended by several weeks.

4. Planning Aid Wales, with input and assistance from project partners, devised an approach for extending the reach of the consultation into the traveller community. The study methodology is described in section 3 (Consultation approach) of this report. Active consultation with Gypsy and Traveller groups began on 12<sup>th</sup> March and continued until 27<sup>th</sup> April 2007. Following active consultation, Planning Aid Wales has considered the responses received and prepared a consolidated report.

5. This is the final consolidated consultation report prepared by Planning Aid Wales on behalf of the Gypsy and Traveller community. It sets out the consultation responses received (section 4 - Summary of consultation responses); identifies key consultation findings (section 5); and makes recommendations for amending the circular (section 6). Appendix 2 critically appraises the adopted consultation methodology to see how it might be improved.

6. In undertaking this work, we have liaised with a number of key individuals who already enjoy good working contacts with members of the target community. We have also drawn on expert opinion as to how best to go about involving this marginalised group in planning issues. Together these individuals have been instrumental in helping us carry out this challenging work.

7. In addition, we owe a debt of thanks to our project partners The Travellers' Aid Trust, The Travellers' School Charitable Trust, and Save the Children, who were able to use their existing contacts to access valuable consultation feedback on the draft circular.

## **2. List of recommendations**

### **Improving participation in the planning policy consultation process**

1. The Welsh Assembly Government and local authorities should seek to engage Gypsy / Traveller and other similarly under-represented groups at the earliest stages in the process of developing new planning policy, particularly where they will experience direct impacts. Consultation should be culturally sensitive and targeted to specific needs and preferences. The aim should be to inform using accessible language, and to engage using appropriate consultation media and techniques.

### **The planning definition of Gypsies and Travellers**

2. Reword the Gypsy and Traveller definition to avoid legal connotations, and consider providing concrete examples of definition meanings.
3. Amend the Gypsy and Traveller definition given in LHMA guidance to accord with the draft circular definition.

### **Relationship with the Local Housing Market Assessment process**

4. The draft planning circular should provide a clearer overview explanation of the need for, and benefits to Gypsy and Traveller groups of becoming more involved in the process of working with authorities to identify need for new sites.
5. LHMA guidance on undertaking housing market assessment for Gypsy and Traveller groups should be prepared using accessible language and a more engaging format. It would be logical to present the housing guidance alongside or within the proposed planning guidance for Gypsies and Travellers (Annex D of the draft circular).
6. The circular should place more emphasis on the importance of local authorities providing a range and choice of potential sites in their LDPs, capable of meeting the identified spectrum of demand for new Gypsy and Traveller sites.

### **Identifying the need for transit sites**

7. The circular should give more encouragement for local planning authorities to work together across administrative boundaries to identify the need for sites, and particularly transit sites along strategic travel routes.

### **Identifying land for new sites in Local Development Plans**

**8.** The circular should explain that the identification of sites in a LDP should not prevent planning applications for other sites being treated on their own merits. An assessment of the stance to be taken if sites are not brought forward for development should also be provided.

**9.** Targeted advice and guidance should be prepared on how the Gypsy and Traveller community can get involved in pursuing candidate sites through the LDP preparation process. The advice would need to be simply expressed, using non-technical language. There is a strong logic for including guidance on LDP involvement with guidance on the interlinked LHMA process and that on submitting planning applications contained in draft circular Annex D.

### **Working with Gypsies and Travellers to identify suitable sites**

**10.** Planning authorities should develop and maintain forms of contact which are sensitive to the needs of Gypsy and Traveller groups, and aim to produce consultation information which is accessible. People and groups already enjoying good existing working relationships with the community should be used as much as possible.

**11.** Draft circular Annex C guidance to local planning authorities should be augmented with targeted advice on how to go about engaging Gypsy and Traveller groups in the development planning process.

**12.** The circular should advise authorities to identify a specific funding allocation to allow targeted consultation and liaison activity with Gypsy and Traveller groups.

**13.** The circular should place greater emphasis in the main text on the need for liaison officers to take responsibility for maintaining contact with different sub-groups, as well as between different authority functions (housing, education, social services, etc). Liaison officers should also be responsible for advising on relevant planning applications, and for making links with policy development on Gypsy and Traveller site provision.

**14.** The circular should seek to build bridges and confidence within the target group by setting out guidance for local planning authorities on the conditions where confidentiality might be offered to consultees.

### **Mixed use sites**

**15.** Local Planning Authorities should be encouraged to prepare, or help Gypsy and Traveller groups to prepare, landscaping frameworks for mixed use sites. Also, an upper density limit for residential units may also be appropriate to protect residential amenity.

### **Sustainability of new sites**

**16.** The circular should encourage local planning authorities to identify the needs and preferences of Gypsy and Traveller groups showing a need for new sites, and aim to involve them in the site selection process.

**17.** The circular should stress that land identified for possible future site development must be in appropriate locations, and well away from 'bad neighbour' land uses and transport corridors.

### **New sites in rural locations**

**18.** An easy-to-read explanation of exceptions policy should be prepared for the target group, possibly for incorporation in draft circular Annex D (Guidance to Gypsies and Travellers).

### **Groups representing Gypsies and Travellers**

**19.** Suggestions made for additional groups and organisations should be added to the list of organisations representing Gypsy and Traveller groups in Wales (draft circular Annex A).

### **Applying for planning permission - guidance for Gypsies and Travellers**

**20.** Targeted, stand-alone guidance intended specifically for Gypsies and Travellers should be prepared once the final circular is approved. The guidance should provide context and information in a suitably accessible form, and aim to provide sufficient understanding of the site planning process to enable the target group to participate fully in all the potentially relevant development control and development planning issues, should they wish to do so.

### **3. Consultation approach**

8. In developing the consultation methodology described below, we liaised with a number of key individuals who have experience of working with Gypsies and Travellers. We have drawn on their expert opinion as to how best to involve this minority, traditionally excluded group in planning issues, as well as their practical support in raising awareness of the consultation and conducting interviews. We would like to thank all those who gave us their time and their thoughts on how best to conduct the work.

#### **Consultation pack**

9. We prepared a consultation pack that was designed to make the information contained in the draft circular as accessible as possible to the target group. The pack (attached to this report as Appendix 1) comprised the following five elements:

i) *Cover letter*

- Providing a general introduction to the planning issues under consideration.
- Explaining the potential impacts of the circular proposals on the Traveller community and the importance of responding to the consultation opportunity.
- Establishing Planning Aid Wales' role as an independent intermediary between the target community and those developing planning policies which are likely to directly affect them.
- Inviting responses either in writing or by telephoning a dedicated Helpline number. The Helpline was also to be available in case people needed further explanation or information about the issues under consideration.

ii) *Briefing document on the draft circular*

This sets out the implications of the draft circular for the target community, using easy-to-read, non-technical language to explain the relevant issues and potential impacts.

iii) *Consultation questions*

A short set of consultation questions capturing the gist of the questions contained in the full version circular. The questions use easy-to-read language and focus on the issues which are considered to be most relevant to the target community.

iv) *Full version draft circular*

The full version draft circular with consultation questions was included for those wishing to refer to it.

v) *DVD*

A DVD providing an audio-visual version of the content of the cover letter, the briefing document and the consultation questions.

### **Active consultation**

10. Active consultation and engagement commenced on 12<sup>th</sup> March 2007 and ended on 24<sup>th</sup> April 2007, a period of just over six weeks which included the Easter bank holiday weekend. A two-pronged approach was adopted to encourage representative and meaningful consultation responses from the target community.

11. Approach 1 followed conventional consultation practices, aiming to raise awareness of the consultation opportunity among Gypsy and Traveller communities and ensuring that anybody who might be interested had an opportunity to comment.

12. Although Approach 1 cast the consultation net widely, we anticipated that certain sections of the Traveller community might not respond to it. Approach 2 was therefore necessary as a means of targeting specific contacts more proactively, with the aim of obtaining quality consultation responses from as broad a representation of the target community as possible.

#### *Approach 1 – conventional consultation*

13. A conventional consultation was undertaken of Traveller groups, their representatives, and organisations likely to have an interest in the planning issues arising from the draft circular.

14. Consultation packs were distributed widely and Travellers were invited to comment either in writing or by telephone. Planning Aid Wales identified key partners across Wales who have close contacts with local Travelling communities. These people were asked to distribute consultation packs to Travellers in their catchment area on our behalf. We are grateful for the help given by The Gypsy Council, Cardiff Gypsy Traveller Project, Wrexham Multi Agency Forum on Gypsies and Travellers, Black Voluntary Sector Network Wales, Commission for Racial Equality, South Wales Police and South East Wales Race Equality Council.

15. We also contacted each unitary authority in Wales in order to identify the key person amongst their staff that would be best placed to help raise awareness of the consultation and to distribute consultation packs. The response we received from unitary authorities was very mixed. We would like to thank particularly key staff from the following authorities for their support:

Blaenau Gwent, Bridgend, Ceredigion, Denbighshire, Flintshire, Gwynedd, Pembrokeshire, Powys, Swansea, Vale of Glamorgan and Wrexham.

16. A dedicated telephone Helpline was manned between 10.30am and 6.00pm on four Tuesdays between 12<sup>th</sup> March and 27<sup>th</sup> April. The Helpline dates were 20<sup>th</sup> March, 27<sup>th</sup> March, 17<sup>th</sup> April and 24<sup>th</sup> April. Planning Aid Wales staff were available on these dates to answer questions from callers, and a qualified volunteer was at hand to advise on any specialist questions arising.

17. In advertising the dedicated Helpline, we offered to call back so that the consultee would not be out-of-pocket.

18. We had been advised that many potential respondents might be unwilling to provide names and addresses. Travellers were therefore given the opportunity to register their comments anonymously, although most respondents chose to provide their name and contact details.

19. Comments and views on the draft circular were to be noted for inclusion in the collective consultation response to be prepared following the active consultation phase.

#### *Approach 2 – proactive engagement*

20. Approach 2 was more proactive, seeking to engage Gypsies and Travellers who were unlikely to respond to the conventional consultation approach outlined above.

21. For this element of the project Planning Aid Wales worked with partners who already enjoyed good contacts with Gypsy and Traveller communities. These were: The Travellers' Aid Trust; The Travellers' School Charitable Trust, and; Save the Children. Each agreed to interview a selection of their existing contacts, with the Planning Aid Wales project officer ensuring that there was no overlap.

22. Originally the South East Wales Race Equalities Council were partners, but due to unforeseen circumstances they have proved unable to complete their interviews. The other three partners have been instrumental in collecting responses from a range of Gypsy and Traveller communities, and we are very grateful for their contribution to making the project a success.

23. Planning Aid Wales and project partner staff were carefully briefed to explain how the proposals contained in the draft circular might impact on the Gypsy and Traveller community, and what its practical implications might be. Again a qualified Planning Aid Wales volunteer was available to answer any specialist questions arising.

24. Each of the partners approached a selection of their contacts amongst Gypsy and Traveller communities and asked them if they were willing to take part in the consultation. They discussed the content of the consultation pack with the consultee and offered to take notes if the consultee wished to make an oral response. Many consultees, however, preferred to give their own written response.

25. The interviews were done over the telephone or face-to-face, as appropriate for each situation. In both cases consultees were supplied with the consultation pack in advance.

26. While consultees were given the opportunity to remain anonymous, those wishing to register their comments individually with their name and contact details were able to do so.

### **Summary of consultation responses**

27. A total of 21 consultation responses were received. They came in a variety of formats including a conventional consultation response, 11 completed questionnaires and 6 transcribed interviews. Save the Children ran two participatory consultation events with groups of young Gypsy and Traveller people aged 9 to 17, resulting in written reports with accompanying drawings by the young people.

28. No responses were received via the dedicated consultation Helpline.

29. In order to access a broad and representative spectrum of opinions, we aimed to receive at least two responses from a range of different sub groups of the Gypsy and Traveller community. They were: traditional / Gypsy Travellers; New Travellers; Travellers currently resident on a site; Travellers currently resident in illegal encampments or on the move; Travellers currently resident in houses who would wish to live in a caravan; and Travellers who have recently applied for planning permission. We also sought to generate responses from across the different regions of Wales.

30. We almost succeeded in achieving our targets for this, the only significant gap being the geographical area of South East Wales (caused by a project partner having to drop out at very short notice).

31. Appendix 2 of this report provides a more detailed analysis of the responses received and reasons given for not responding. It also includes an evaluation of the study methodology.

## 4. Summary of consultation responses

32. Responses received to the consultation questions contained in the consultation pack have been analysed and a summary is provided below. Each individual consultation response is ascribed a number to preserve the anonymity of respondents. A full set of consultation questions is contained in the consultation pack, which is appended to this report.

### The definition of Gypsies and Travellers

33. The first consultation question asked whether consultees are happy with the proposed planning definition of Gypsies and Travellers. Overall the response to this question is positive. Only three responses disagree outright, giving the following reasons:

- Only people with a *tradition* of a nomadic lifestyle should be classed as Gypsies and Travellers; New Travellers should not be included. (Respondent 5)
- The definition seeks to establish an artificial distinction between Gypsies and Travellers and show people; some Gypsies and Travellers also provide entertainment and / or shows. (Respondent 19)
- The definition *'is not sufficient and may be misleading and / or vague. 'Nomadic' particularly requires further definition.'* (Respondent 13)

34. Some respondents have reservations about specific elements of the proposed definition:

- The term 'Gypsy' should not be used as it is *'extremely offensive'*. The terms 'Traveller' or 'Romany' should be used instead. (Respondent 7)
- Respondent 1 questions whether Romany Gypsies are recognised as a distinct ethnic group by the courts.
- People who live in a caravan because they can't afford a brick-built house should also be considered. (Respondent 17)

35. There is general agreement that people who otherwise fit the definition, but have stopped travelling for health or educational reasons, should still be classed as Gypsies and Travellers for planning purposes.

- However, there may be other reasons why Gypsies and Travellers have stopped travelling, for example to meet their social and economic needs.

People also stop travelling because it is being made increasingly difficult by the authorities and because they experience harassment. (Respondents 19 and 21)

- The Gypsy Council on the other hand warns that *'there are those families who have abandoned the Gypsy way of life and moved permanently out of caravans into houses, who may in fact resent it even being suggested that they should still be regarded as having Gypsy status.'*

36. Distinguishing between different ethnic groups of Travellers, such as Gypsies, Irish Travellers etc, would not be helpful, and indeed impractical as there has been much intermarriage. (Respondents 1 and 5)

### **Relationship with Local Housing Market Assessments**

37. The second consultation question asked whether consultees think local authority housing studies will be effective in identifying the need for new sites.

38. Responses are very mixed as to whether the exercise should be called 'Local Housing Assessment'. They span from: *'Yes, it's all part of one big picture that shouldn't be fragmented.'* (Respondent 3), to; *'It should be done separately. The needs of Travellers and settled people are too different.'* (Respondent 4)

39. However, most of the further explanations given with both positive and negative responses point in a similar direction. They stress that the needs of travelling communities are very different from settled communities, and that they are very diverse among themselves. This means that the methods used for assessing needs have to be appropriate for the particular group. It is suggested that the assessment should be undertaken by people who know and understand the travelling communities, such as Traveller Liaison Officers.

40. It is pointed out that Gypsies and Travellers who live in brick and mortar housing (and possibly not of their own choice) need to be included in any assessment of need for Gypsy and Traveller sites.

41. Several respondents highlight that the needs of different travelling communities are very different, and that it may not be appropriate for them to share one site between them. This should be taken into account in any needs assessment. It is also pointed out the assessments are merely a numbers exercise; sites should be identified and designed to meet the needs of their future occupants, and these needs are best established by talking to them.

42. Respondent 19 suggests a different method of identifying the need for sites: *'1. to monitor and evaluate applications for Travellers sites (private planning applications) and 2. to regard the incidences of unauthorised encampments as evidence of need.'*

43. The Gypsy Council (Respondent 1) suggests that local authorities could use their records of housing benefit payments to residents on official Gypsy and Traveller sites to find out how many families need pitches in their area.

### **Identifying need for transit sites**

45. The third consultation question asked consultees how the need for transit sites should be identified. Respondents 13, 20 and 21 argue that the real need for transit pitches would only become apparent if all the current obstacles to travelling were removed.

46. Several methods of needs assessment are suggested:

- Five respondents say the need for transit sites is evident from the number of unauthorised encampments in an area.
- Respondent 3 says the number of unauthorised encampments should be part of the housing market assessment.
- Respondent 14 says transit sites are needed on all the routes Gypsies and Travellers travel along to access different work opportunities.
- Respondent 19 suggests setting up a telephone helpline and interactive website where Gypsies and Travellers could register their need for transit sites.
- Respondent 6 argues that the need for transit sites should be assessed nationally (i.e. across the UK), and then provision should be shared between local authorities.

47. Respondents have also used this question to give their views about how transit stopping places should be provided, and why they are needed:

- Four respondents suggest Gypsies and Travellers should be allowed to stop by the roadside temporarily, which would reduce the need for designated transit sites.
- Four respondents say transit pitches should always be linked to residential pitches and managed by the occupants of the residential site. The following argument summarises this position: *'Separate transit sites don't work, they wouldn't be safe as one wouldn't know who else was staying there... Travellers who live on legal sites should be allowed to let people they trust stay on their plot temporarily. This would require that plots are big enough to accommodate another family temporarily.'* (Respondent 5)

- Temporary stopping places for Gypsies and Travellers should be provided as routinely as lorry parks. (Respondent 10)
- There should be a telephone helpline where Gypsies and Travellers could find out where there are transit pitches available. (Respondent 18)
- Respondent 7 points out that *'it will only work if there is proper permanent site provision. Current transit sites are used in reality as permanent sites and this way the council can easily move people on whenever they want – no security at all.'*
- Response 2 from Save the Children states: *'The children and young people involved in the consultation on the planning guidance for new site provision articulated that in recent years local authorities have blocked off many of the traditional stopping places used by Gypsies and Travellers. As a result they have been compelled to stop in places that are closer to the settled population, and this has often become a source of tension. Given the inadequate provision of council-owned sites and the difficulties in getting planning permission for private sites, roadside camping can be the only option for some families. Therefore, the guidance issued to Local Authorities on establishing new and transit sites is welcome.'*

## Identifying land for new sites in Local Development Plans

48. The fourth consultation question asked whether consultees think land for new sites should be identified in Local Development Plans. Generally the responses given to this questions are positive, with Respondent 4 even emphasising that local authorities should have a duty to allocate sites.

49. There are, however, some caveats:

- The allocation needs to be done *‘with careful consultation with locals and Travellers’* (Respondent 18) to ensure the allocated land is not *‘in totally unacceptable locations’* (Respondent 1).
- *‘It is important not to allocate one big site, as these invariably cause conflicts. There should be several small sites of not more than ten caravans. It would even be possible to fit these small sites between / at the edge of houses.’* (Respondent 5)
- There would still be a need for flexibility to respond to new situations as they arise, with plans needing to be reviewed regularly. (Respondents 9, 14 and 21)

50. There are also outright objections to sites being allocated in LDPs:

- *‘We don’t think that simply allocating land for Travellers sites in the LDP would work. If that happened the price of the land would rise immediately, as it does with land allocated for housing. Then no Traveller would be able to afford it. If land is to be allocated in the LDP, the local authority will have to commit to developing those sites themselves at the same time. In addition, policies should provide the opportunity for Travellers to develop their own sites on land not allocated in the LDP.’* (Respondent 5)
- This *‘may be appropriate in major urban locations but otherwise the ‘top down’ approach to site location will fail. Once land has been allocated in the Development Plan (which may not be suitable) it will lead to refusal of sites elsewhere.’* (Respondent 10)
- Respondent 21 objects to allocating sites in the LDP *‘if this means any land NOT designated in the LDP is then harder to get planning for.’*

## **Working with Gypsies and Travellers to identify suitable sites**

51. The fifth consultation question asks consultees how they think local authorities should go about working with Gypsies and Travellers to identify suitable sites.
52. The general thrust of responses emphasises the importance of making meaningful contact with the people who actually need sites. Contact should be made directly with local Traveller communities; it should be friendly and helpful, and must be based on trust. Gypsies and Travellers want to be treated in a sensitive and understanding way. They want to know that the authority contacting them is taking them seriously and that actions will follow accordingly.
53. The preferred form of contact which is mentioned most (ten times) is face-to-face contact. Contact should be made via a designated liaison or outreach person, or someone else who is open to communicate with them in a way that is not formal and on the basis of trust. Young people highlighted the importance of continuity rather than *'different faces all the time'* (Respondent 2). Two respondents suggest that the liaison person should be from within the travelling community. Respondent 17 says that *'the list of contactable associations in Annex A (also Planning Aid Wales) are helpful, if a 'go-between' is needed.'*
54. A telephone helpline is suggested by three respondents and a website by one.
55. Generally people are happy to receive documents in writing so long as that is not the only form of communication. Respondent 3 *'would like to be briefed in writing beforehand, so we can discuss and consider the subject thoroughly within our community.'*
56. It is important that written documents are accessible: *'We are happy to receive any documents in written form, but they need to be in plain language and with explanations for lay people.'* (Respondent 5). Also, *'Local authorities should prepare 'jargon-busting' material that Gypsies and Travellers can understand. It should be available at all public outlets and be used by any organisation.'* (Respondent 19)
57. Six respondents said it was very important to be given the opportunity to remain anonymous.
58. Respondents 1 and 21 point out that authorities should *'make sure to contact people / organisations representing as full a range of 'types' of Travellers as possible – e.g. Roma, Irish, New'* (Respondent 21), as *'the Gypsy / Traveller community as defined is not one homogeneous group, but is rather composed of a number of different groups of people, each with their own individual values and*

*attitudes towards life, different family sizes and ways of raising children, and even different standards of social and personal hygiene.*' (Respondent 1)

### **Mixed use sites (combining living and working)**

59. The sixth consultation question asks whether consultees think sites should be places where people also work and do business. Generally there is strong agreement with this. *'I think it is important for Gypsies and Travellers to be able to live and work from the same place. Many of us are used to living and working like this.'* (Respondent 11). Respondent 9 adds the caveat *'within reason'*, considering that some business activities are not appropriate due to them being too noisy or dangerous.

60. Respondent 21 objects to Gypsy and Traveller sites generally being designated for mixed use: *'Each family / community's application should be assessed individually on this issue. In terms of identifying sites in advance (e.g. for the LDP) a range of types should be identified.'*

61. Respondent 1 raises the possibility that mixed use sites may be contrary to the provisions of the Environmental Protection Act 1990.

### **Sustainability criteria for new sites**

62. The seventh consultation question asks consultees for views on a list of criteria for assessing whether new sites are sustainable. In general, consultees do not object to the listed criteria, although some are questioned. Also, some consultees would like to see additional criteria.

63. The following criteria for site sustainability are questioned:

- *'First bullet point is bad – local communities will never accept Travellers, no matter how good they are. People need to respect each other, nothing more. What does this mean anyway?'* (Respondent 7). On the other hand, the young people in Response 2 are adamant that: *'we should be part of the community'*.
- Several respondents point out that different groups of Gypsies and Travellers have different needs. Regarding access to schools and other services, a number of New Travellers say they don't need or want it; for them, sustainability means being able to live self-sufficiently. They feel that land which is suitable for growing food and fuel can be more important than being near services. However, none of the respondents from traditional Traveller communities said they did not want services. The young people in Response 2 especially emphasised that they wanted

to be on the edge of a town or village, near services and amenities, and *'not out of the way'*.

64. The following additional criteria were suggested:

- The most important aspect of site sustainability seems to be a suitable location that is safe and healthy. Unsuitable locations named are on old tips, under electricity pylons or motorways, next to sewage works or factories, and on sites next to busy roads. Respondent 7 sums up: *'This should be a major point in site sustainability that they are built in suitable locations – not in places that you would not build a house.'*
- Another point raised is that effective management is vital for site sustainability. A number of suggestions are made as to how this could be done:
  - Respondent 1 suggests establishing an *'independent Task Group on Gypsy site management.'*
  - Respondents 1 and 5 advocate small sites, which would be easier to manage. *'Sites should never be bigger than ten plots at the most, with residents who know each other. Larger sites and mixing different groups of residents causes conflicts. Small sites would not need a warden as the residents could keep an eye on things.'* (Respondent 5)
  - *'Each resident family should be in control of their own plot, even if they rent it.'* (Respondent 5)
  - *'Plots should be big enough for two families so that the residents can accommodate relatives or friends.'* (Respondent 5). This would make separate transit sites unnecessary.
  - *'Rent prices for plots should be reasonable (about half of what is common now) so that people who don't receive housing benefit can afford them.'* (Respondent 5)
  - *'All rent should have to be put back into the maintenance of the site.'* (Respondent 5)
  - *'Site improvements need to be done in consultation with the residents so that they actually suit their needs. (e.g. we would want sheds with showers, washing machines etc. rather than running water etc in our caravan).'* (Respondent 5)
- Both young people and adults highlight the importance of a safe place for children to play on the site.

- It should be possible to keep animals on the site.
- There should be refuse collection and recycling facilities.

### **New sites in rural locations**

65. The eighth consultation question seeks consultees' views on whether it should be harder to establish new sites in rural locations away from towns and villages. The general thrust of responses is that rural locations shouldn't be ruled out for new sites, and that people should have a choice about where they want to live.

66. Only Respondent 4 is adamant that sites should not be allowed in rural locations at all: *'Travellers sites should always be near villages. Rural exception policies could be used as an excuse to not permit sites in / near villages.'*

67. The main reasons given for why new sites should be allowed in rural locations are:

- Sensitively designed sites can have a very low impact on the environment. *'Should focus more on what the site will be like / its sustainability and impact and less on exactly where it is geographically.'* (Respondent 21)
- The settled community do not want Gypsy and Traveller sites near them.
- Many New Travellers have chosen this lifestyle to get away from the mainstream. Forcing them to live near settlements would negate the purpose of living as a Traveller. Respondent 13 argues that land should be made available for those who want to use it for subsistence and to live on it.

68. Respondent 12 argues that establishing a Gypsy and Traveller site in a rural location *'shouldn't be made more difficult than planning for anybody else who might want to build a house and move in to the area.'*

### **Groups representing Gypsies and Travellers**

69. Annex A of the circular gives contact details for groups which stand up for the rights of Gypsies and Travellers. The ninth consultation question asks whether consultees think additional groups should also be listed

70. Respondents are generally happy with the organisations on the list, but several point out that involving these organisations can not be a substitute for talking to local Gypsies and Travellers directly. *'You always have to talk to the*

*people directly affected by a policy or proposal. These central organisations are a waste of time when you want to discuss local issues.* (Respondent 5)

71. Respondent 1 points out that WAG needs to establish for each of the listed organisations what their involvement is in Wales, and how knowledgeable they are about local issues.

72. Save the Children highlights the need for young people to be engaged in discussions about planning decisions, citing the United Nations Convention on the Rights of the Child. *'Article 12 of the Convention states that all children and young people have the right to have a say and have their opinions taken into account on decisions that affect their lives.'*

73. The following organisations are suggested as additions to the Annex A list:

- Save the Children
- Travellers Aid Trust (mentioned three times)
- Travellers School Charity (mentioned four times)
- Friends and families of Travellers
- Liberty
- Citizens Advice Bureaux
- Sites 4 Life Collective
- Groundswell UK (mentioned twice; *'supports a wide range of Traveller types'*)
- Rural Media Company
- *'more legal aid / advisory groups'*
- WAG Gypsy and Traveller Unit (suggestion by the Planning Aid Wales project team)

### **Applying for planning permission - guidance for Gypsies and Travellers**

74. Guidance contained in Annex D of the draft circular is intended for Gypsies and Travellers interested in seeking permission for private sites. The final consultation question asks whether consultees think the draft guidance is effective in helping them understand how to go about applying for planning permission.

75. In short, responses are negative with only four respondents saying they can understand the document without difficulty (all of them are New Travellers). Five respondents don't feel able to comment at all, and four say that it would need to be much more accessible to be useful.

- *'I found it quite hard to read. I think it should be re-written in a more natural, less official, friendlier manner. Bearing in mind that some vocabulary used may not be understood also.'* (Respondent 18)
- *'It should be written more user-friendly, in simple language and giving more explanations.'* (Respondent 3)
- *'Make it straight forward and not long winded.'* (Respondent 15)
- *'This paper is not helpful at all. It needs to use less technical terms and explain things in a way that someone who is new to the subject has got a real chance of understanding it.'* (Respondent 5)

76. Also several respondents emphasise that this document would only make sense in conjunction with face-to-face advice and support, and should not be used instead of it.

- The transcript of Respondent 7 reads: *'Doesn't make any sense to her. She needs a help-line and someone who she can speak to face to face who is not part of the council who will explain what she can and cannot do and how to go about it.'*
- Respondent 1 *'welcomes that LPAs should offer advice and practical assistance with planning procedures to Gypsies and Travellers who may [...] wish to acquire their own land for development'*, but points out that this support must be genuine. Engagement with Gypsies and Travellers will only help if the authority doesn't find obstacles all the time.

### **Other issues raised during consultation**

77. Other important issues are raised by respondents which are not covered in responses to the consultation questions above. They are as follows:

- Referring to paragraph 5 of the draft circular, Respondent 13 asks: *"How do you know that 'Many Gypsies and Travellers wish to find and buy their own sites to develop and manage?'"*.
- Respondent 1 thinks: *'The vast majority of Welsh Gypsies prefer to live on local authority sites or to move into and out of houses, and so have no need for private planning guidance.'*

- Respondent 1 welcomes the enforcement and appeal guidelines.
- Respondent 1 believes that consultation with Gypsy and Traveller groups should have started earlier in the process of drafting the circular.
- Respondent 1 thinks that the Welsh Assembly Government owns sufficient land to accommodate all currently site-less families in Wales: *'This would have the effect of taking Gypsy site provision out of the political arena [...]; given the extreme opposition to such provision [...], politicians are hardly ever likely to actually vote for the provision of Gypsy sites in their area.'*
- Commenting on draft circular Annex D content (section 4ii), Respondent 19 asks: *'details of all the people who will live on the site – this is too vague – what details? If you apply to build a house, the planning authority doesn't ask you who will be living in it?'*

### **Consultation feedback**

78. Respondents 2, 5, 7 and 13 have expressed a wish to be kept informed about the final circular and further developments. Planning Aid Wales will undertake to do this, working through project partners.

## **5. Key consultation findings**

### **Definition of Gypsies and Travellers**

79. There is general support for the proposed planning definition of Gypsies and Travellers. However, the text definition in the draft circular is expressed in a legal manner. There may be benefit to using simpler, clearer and more democratic language.

80. There are differences between the proposed planning circular definition of Gypsies and Travellers and the definition provided in Local Housing Market Assessment (LHMA) guidance. Local authority planning and housing functions will need to work to the same definition if they are to integrate properly under the proposed system.

81. In order to operate the new system effectively, local authority housing and planning officers would benefit from more detail of what these definitions mean in practice. The circular could flesh out the definition, and possibly give case-study examples of what it means in practice.

### **Links between Housing Assessment and LDP preparation**

82. There is evidence of confusion among respondents about the relationship between the LHMA process and preparation of Local Development Plan (LDP) policies / land allocations. This is important as the two processes are intended to be interlinked and sequential, with LHMA identifying existing and future needs for different categories of accommodation, and LDPs identifying appropriate land to meet identified need.

83. Some of the confusion may be due to the draft circular not providing an easily understood context for, and description of the linkages between the two processes. Beyond the linkage indicated in Diagram 1, the reader is referred for more information to Appendix F of the LHMA guidance document (published in 2006). This provides comprehensive and well thought through advice to housing and related professionals on how to engage Gypsy and Travellers in dedicated assessments.

84. However, the language used in the housing guidance is unlikely to be accessible to the target group, and they do not appear to be aware of it. For instance, the LHMA guidance makes clear that: housing authorities should carry out separate studies into the accommodation needs of Gypsies and Travellers; the needs of sub-groups should be considered, and; housing need studies should be planned and implemented in a culturally sensitive manner. It is evident that several respondents to this consultation are unaware of these provisions.

85. For the envisaged process of 'consult – survey – plan - provide' to work, Gypsy and Traveller groups will need to buy into and be engaged in the process. This is only likely to happen once they have a fuller understanding of the process and respective roles in it. The guidance needs to be expressed in a more accessible and engaging way, explaining clearly the anticipated links between local authority housing and planning functions.

86. A key planning issue here relates to the geographic extent of LHMA study areas. The housing guidance recognises that the accommodation needs of Gypsy and Traveller communities are unlikely to align with conventionally defined 'housing markets areas', and that this should be taken into account when deciding to work across administrative boundaries. There might be benefit in preparing similar guidance for planners, which stresses the need for collaborative working across a number of planning authority areas.

87. Finally, there is the issue of housing choice, a right which is available to people in all other housing sectors. To avoid overtones of discrimination, both the circular and housing guidance could do more to emphasise 'choice' as an aspect of Gypsy and Traveller housing provision. Choice is strongly emphasised when identifying need and finding land for conventional housing. The accommodation needs of Gypsy and Traveller communities should be met in the same way, with a choice of sites and locations available to meet the spectrum of demand.

### **Identifying need for transit sites**

88. One of the key planning issues relating to provision of transit sites is the identification of 'strategic corridors'. The need to gather information on need at a regional or even national level will be lost if left to individual local planning authorities. It will also be important when gathering and maintaining regional data to ensure it can be disaggregated down to individual authority areas.

89. Support for mixed permanent / transit sites is apparent. Provision of suitably sized sites to allow mixed transit / permanent residential accommodation could therefore be recognised as relevant to planning provision.

90. Again, there are responses to this issue which indicate a lack of awareness of the LHMA guidance. For example, it encourages housing authorities to look for and record evidence of unauthorised encampments as part of the evidence required to assess need: Several respondents are unaware of this.

### **Identifying land for new sites in Local Development Plans**

91. The Gypsy and Traveller community express fears that helping to identify sites might make getting permission on other sites even more difficult. It might also lead to identified sites not coming forward because of enhanced 'hope value' (the landowners holding out for a possible future permission to build full market housing).

92. This would suggest that the guidance needs to be clear on how a local planning authority should approach each of these circumstances. This might mean stipulating that the identification of sites should not prevent other sites being treated on their merits, and also an assessment of the stance to be taken if sites are not brought forward for development. It might also be useful to provide examples, such as the recent development control appeal case where a temporary permission for a Traveller site was allowed on the basis that relying on criteria-based policies in the development plan for site provision was inadequate.

93. There is evidence that some respondents are not aware of the opportunities for establishing new sites by participating in the LDP preparation process. This is a key stage in the anticipated process for meeting identified need, and there would be benefit in preparing targeted advice on this matter, possibly for inclusion in draft circular Annex D (Guidance to Gypsies and Travellers). The advice would need to be simply expressed and use non-technical language.

### **Working with Gypsies and Travellers to identify suitable sites**

94. Continuity, approachability and trust seem to be especially important for the Gypsy and Traveller community when dealing with local authorities. Planning authorities will need to identify forms of contact which are sensitive to needs, and produce information which is accessible. There are already people and groups with established links with the community, and these existing links should be used as much as possible.

95. Face-to-face contact is most appreciated by the target group; however, this requires time, skills and a particular aptitude. There are also additional costs to preparing appropriate and accessible consultation material which are required by this group. The circular might therefore advise authorities to identify a specific funding allocation to allow targeted consultation and liaison activity with Gypsy and Traveller groups.

96. The guidance currently contained in Annex C of the draft circular encourages authorities to identify a specific officer to deal with Gypsy and Traveller liaison. This point could be emphasised in the main text, as could the need for contact and liaison with different sub-groups, as well as between

different authority functions (housing, education, etc). Responsible officers could also advise on relevant planning applications (cutting across individual DC team 'patches') and link into policy development on Gypsy and Traveller site provision. From our experience, some authority liaison officers are doing very valuable work. Others, however, are not being given sufficient time and resources to make much impact.

97. The draft circular Annex C might advise local planning authorities that Planning Aid Wales can provide independent advice and information to this group.

98. Finally, planners have a tendency to downgrade the importance of comments received anonymously (this is particularly so with enforcement). Yet several respondents to this consultation would not have participated in a more conventional consultation. Gypsy and Traveller communities have not been particularly well served by the planning system in the past, and this needs to be recognised. One effective way is by offering anonymity to consultees. Some guidance in the circular for planners on this being a feature of the Gypsy and Traveller community might be helpful, if there are considered to be valid cultural reasons for it.

### **Mixed use sites**

99. Responses suggest that seeking to provide a 'range and choice' of residential and mixed use sites is the best response to the issues raised in consultation.

100. For sites identified in LDPs, it needs to be clear which are for mixed use and which are not. Sites combining residential and business uses would need careful design and landscaping to minimise inconvenience to users and neighbouring occupiers. An upper density limit for residential units on mixed use sites might also be appropriate.

### **Sustainability of new sites**

101. There are two key issues here. First, different Gypsy and Traveller groups perceive sustainability in different ways. For example, some value proximity to public services, others seek a more self-sufficient lifestyle away from settlements, and some just want safer, more stable and healthier places to live. A range and choice of site options is available in other housing sectors – urban, suburban, rural; large and small plots. Range and choice of sites is needed to help meet the spectrum of need for sites arising from the Gypsy and Traveller community. Ideally, the needs and preferences of groups likely to occupy new sites should be taken into account as an integral part of the site selection process.

102. Second, the location of sites in relation to neighbouring uses of land should be a key factor in identifying possible sites. Good residential environments are a key element of sustainability, and it is unacceptable to propose new sites on land which would be considered unsustainable for conventional housing (for instance on floodplains, adjoining 'bad neighbour' uses, or next to major roads).

103. It is suggested that prior to development of new sites, density limits could be suggested and location-specific landscape briefs prepared. This would help secure residential amenity for site residents and neighbours.

104. A number of responses to the site sustainability question raise site management issues. Although beyond the technical remit of planning, they are nonetheless key to maintaining site sustainability. Flexibility and a degree of autonomy are sought, and local authorities should be aiming to manage public sites in a way which is inclusive and empowers residents.

### **New sites in rural locations**

105. In terms of the broad location of new sites, a range and choice of possible site locations is needed to meet the spectrum of need arising from Gypsy and Traveller communities. Depending on the nature of the need, preferred locations could range from in or adjoining existing settlements, to sites in the open countryside. Again, the needs and preferences of the groups likely to occupy possible new sites should be taken into account as an integral part of the site identification and selection process.

106. There is evidence of misunderstanding among respondents of what rural exceptions policies are meant to achieve and how they operate in practice. This is a complex area of planning policy, but people searching for possible exceptions development land need to have a good working understanding of the basic principles. There would therefore be benefit in preparing an easy-to-read explanation of exceptions policies, possibly for incorporation in draft circular Annex D (Guidance to Gypsies and Travellers).

### **Groups representing Gypsies and Travellers**

107. Respondents feel that the groups identified as representing Gypsy and Traveller communities (listed in draft circular Annex A) should not be used as proxies for identifying local community opinion, or for providing information on need. Face-to-face contact is preferred, supported if necessary by accessible consultation material.

108. Respondents make several good suggestions for other groups and organisations to be added to the Annex A list.

### **Applying for planning permission - guidance for Gypsies and Travellers**

109. In general, responses indicate that the proposed guidance for Gypsies and Travellers (Annex D of the draft circular) is not accessible to the target group, with a small minority of respondents able to understand it in its current form. Content would need to be expressed in a much more accessible and user-friendly way for the guidance to achieve its aims. The same may be said of the main body contents of the consultation draft circular, which several respondents state would have made little sense without the briefing document prepared for this consultation project.

110. Gypsy and Traveller groups are envisaged as playing a key role in helping local authorities identify the need for new sites, as well as bringing forward possible new sites to meet identified need. For this to approach to work, there will need to be accessible and easily available guidance which uses plain language to describe the overall process and the respective roles and expectations of key players. The guidance should be capable of standing alone from the planning circular.

111. Consideration might also be given to providing more information about opportunities to secure new sites through involvement in LDP preparation. Currently, the guidance focuses on the planning applications process and does not therefore present a comprehensive picture of the anticipated process of planned site provision.

## **6. Conclusions and recommendations**

### **Improving participation in the planning policy consultation process**

113. Marginalised, hard-to-reach groups need to be engaged from the very earliest stages in the process of developing planning policy. This is particularly so where the policy will have a targeted impact on particular groups such as Gypsies and Travellers, as is the case with the draft circular.

114. Gypsies and Travellers are envisaged as playing a key role in helping local planning authorities identify the need for new sites, and selecting possible new candidate sites. This can only happen effectively once they have a clear understanding of the wider housing / planning process. Consultation is an opportunity to increase understanding, as this consultation project has demonstrated.

115. An appropriate, culturally-sensitive approach and use of accessible language are essential prerequisites of successful consultation. Consultation processes need to be designed around the needs and preferences of the marginalised group in question, particularly where the group is likely to be directly affected by future planning policy.

Recommendation 1): The Welsh Assembly Government and local authorities should seek to engage Gypsy / Traveller and other similarly under-represented groups at the earliest stages in the process of developing new planning policy, particularly where they will experience direct impacts. Consultation should be culturally sensitive and targeted to specific needs and preferences. The aim should be to inform using accessible language, and to engage using appropriate consultation media and techniques.

### **The planning definition of Gypsies and Travellers**

116. The planning definition of Gypsies and Travellers given in the draft circular is adequate, but it could be expressed in a more simple and user-friendly way to avoid legal connotations. Examples could also be given to show what different aspects of the definition mean in practice.

Recommendation 2): Reword the Gypsy and Traveller definition to avoid legal connotations, and consider providing concrete examples of definition meanings.

117. The housing definition of Gypsies and Travellers provided in the LHMA guidance needs to be amended to assist integration between local authority housing and planning functions.

Recommendation 3): Amend the Gypsy and Traveller definition given in LHMA guidance to accord with the draft circular definition.

### **Relationship with the Local Housing Market Assessment process**

118. This is a key issue which will be absolutely central to making the proposed system work properly. The process of identifying need for new sites through LHMA's and then meeting identified need through LDP site allocations is robust in principle. However, Gypsy and Traveller communities need a much clearer explanation and understanding of the critical links between LHMA's and development plan preparation. The respective roles and responsibilities of local authority housing and planning functions will need to be clarified, as will the expectations on the target group to be involved in the site planning process.

119. Guidance provided in LHMA Appendix F (undertaking assessments for Gypsy and Traveller communities) uses technical language to describe a thorough and well thought-through process. In its present form, its contents are considered to be inaccessible for a significant proportion of the target community. On its own, the draft circular text does little to help the reader establish a clear picture of the integral relationship between the processes for identifying the need for sites and for planning their provision.

Recommendation 4): The draft planning circular should provide a clearer overview explanation of the need for, and benefits to Gypsy and Traveller groups of becoming more involved in the process of working with authorities to identify need for new sites.

Recommendation 5): LHMA guidance on undertaking housing market assessment for Gypsy and Traveller groups should be prepared using accessible language and a more engaging format. It would be logical to present the housing guidance alongside or within the proposed planning guidance for Gypsies and Travellers (Annex D of the draft circular).

Recommendation 6): The circular should place more emphasis on the importance of local authorities providing a range and choice of potential sites in their LDPs, capable of meeting the identified spectrum of demand for new Gypsy and Traveller sites.

### **Identifying the need for transit sites**

Recommendation 7): The circular should give more encouragement for local planning authorities to work together across administrative boundaries to identify the need for sites, and particularly transit sites along strategic travel routes.

## **Identifying land for new sites in Local Development Plans**

120. Respondents are fearful that helping to identify sites in the LDP might make getting permission on other sites even more difficult. It might also serve to increase the 'hope value' of land identified for new sites. The circular needs to be clear about how local planning authorities should approach each of these circumstances.

Recommendation 8): The circular should explain that the identification of sites in a LDP should not prevent planning applications for other sites being treated on their own merits. An assessment of the stance to be taken if sites are not brought forward for development should also be provided.

121. Respondents are generally unaware of the opportunities available for establishing new sites by participating in the LDP preparation process.

Recommendation 9): Targeted advice and guidance should be prepared on how the Gypsy and Traveller community can get involved in pursuing candidate sites through the LDP preparation process. The advice would need to be simply expressed, using non-technical language. There is a strong logic for including guidance on LDP involvement with guidance on the interlinked LHMA process and that on submitting planning applications contained in draft circular Annex D.

## **Working with Gypsies and Travellers to identify suitable sites**

122. Continuity, approachability, respect and trust are important for the Gypsy and Traveller community when dealing with local authorities.

Recommendation 10): Planning authorities should develop and maintain forms of contact which are sensitive to the needs of Gypsy and Traveller groups, and aim to produce consultation information which is accessible. People and groups already enjoying good existing working relationships with the community should be used as much as possible.

123. The guidance advising local authorities on how to deal with applications from the target group (contained in Annex C of the draft circular) excludes consideration of the need for sensitive and culturally aware liaison during development plan preparation.

Recommendation 11): Draft circular Annex C guidance to local planning authorities should be augmented with targeted advice on how to go about engaging Gypsy and Traveller groups in the development planning process.

124. Face-to-face communication is the form of contact which is often the most appropriate for reaching Gypsy and Traveller communities. However, this requires resources, and there are also additional costs to preparing accessible consultation material.

Recommendation 12: The circular should advise authorities to identify a specific funding allocation to allow targeted consultation and liaison activity with Gypsy and Traveller groups.

125. Draft circular Annex C guidance encourages authorities to identify a specific officer to deal with Gypsy and Traveller liaison.

Recommendation 13: The circular should place greater emphasis in the main text on the need for liaison officers to take responsibility for maintaining contact with different sub-groups, as well as between different authority functions (housing, education, social services, etc). Liaison officers should also be responsible for advising on relevant planning applications, and for making links with policy development on Gypsy and Traveller site provision.

126. Consideration should be given to including a reference in Annex C to Planning Aid Wales providing independent advice and information to this group.

127. The significance of comments received anonymously tends to be downgraded in the planning system. Yet because Gypsy and Traveller communities have not been well served by the planning system in the past, a sizeable proportion of the population is unlikely to respond to a planning consultation if name and contact details are required.

Recommendation 14: The circular should seek to build bridges and confidence within the target group by setting out guidance for local planning authorities on the conditions where confidentiality might be offered to consultees.

### **Mixed use sites**

128. A range and choice of sites, including mixed use sites, should be provided in LDPs to meet identified need. Where sites are identified in LDPs, it needs to be clear which are for mixed use activities and which are not.

129. Mixed use sites will need careful design and landscaping to minimise inconvenience to users and neighbouring occupiers.

Recommendation 15: Local Planning Authorities should be encouraged to prepare, or help Gypsy and Traveller groups to prepare, landscaping frameworks for mixed use sites. Also, an upper density limit for residential units may also be appropriate to protect residential amenity.

### **Sustainability of new sites**

130. Different Gypsy and Traveller groups perceive site sustainability issues in different ways. A range and choice of site options is available in other housing sectors, and the aim should be provide a sufficient range and choice to meet the spectrum of identified need in this community.

Recommendation 15: The circular should encourage local planning authorities to identify the needs and preferences of Gypsy and Traveller groups showing a need for new sites, and aim to involve them in the site selection process.

131. New sites should only be proposed on land which would be considered suitable / sustainable for conventional housing.

Recommendation 16: The circular should stress that land identified for possible future site development must be in appropriate locations, and well away from 'bad neighbour' land uses and transport corridors.

### **New sites in rural locations**

132. A range and choice of possible site locations (urban, suburban, edge-of-settlement, and open countryside) is needed to meet the spectrum of need arising from Gypsy and Traveller communities. The circular should encourage local authorities to identify the needs and preferences of Gypsy and Traveller groups showing a need for new sites, and aim to involve them in the site selection process.

133. There is evidence of misunderstanding among the Gypsy and Traveller community of what rural exceptions policies are meant to achieve, and how they operate in practice.

Recommendation 17: An easy-to-read explanation of exceptions policy should be prepared for the target group, possibly for incorporation in draft circular Annex D (Guidance to Gypsies and Travellers).

### **Groups representing Gypsies and Travellers**

144. Groups identified as representing Gypsy and Traveller communities (listed in draft circular Annex A) should not be used by local authorities as proxies for identifying local community opinion, or for providing information on need. Face-to-face contact is preferred, supported if necessary by accessible consultation material.

Recommendation 18: Suggestions made for additional groups and organisations should be added to the list of organisations representing Gypsy and Traveller groups in Wales (draft circular Annex A).

### **Applying for planning permission - guidance for Gypsies and Travellers**

145. Appendix D guidance is intended to inform Gypsy and Traveller communities about submitting planning applications. In its current form, it is likely to be inaccessible to a large proportion of the target group. It also needs to contain information on rural exceptions site policy and how to promote sites through the LDP preparation process.

Recommendation 19: Targeted, stand-alone guidance intended specifically for Gypsies and Travellers should be prepared once the final circular is approved. The guidance should provide context and information in a suitably accessible form, and aim to provide sufficient understanding of the site planning process to enable the target group to participate fully in all the potentially relevant development control and development planning issues, should they wish to do so.

## **Appendix 1)**

### **Consultation pack**

## **Appendix 2)**

### **Consultation methodology appraisal**

#### **Analysis of responses received**

A2.1 A total of twenty one responses were received from individuals and groups. The list below gives an impression of the range of the respondents' backgrounds as far as they are known to us:

- Traditional / Gypsy Travellers (7 respondents)
- New Travellers: (13 respondents)
- Travellers currently resident on a Travellers site: (5 respondents)
- Travellers currently resident in illegal encampments or on the move: (7 respondents)
- Travellers currently resident in houses who would wish to live in a caravan: (4 respondents)
- Travellers who have recently applied for planning permission: (6 respondents)
- North Wales: (3 respondents)
- Mid and West Wales: (2 respondents)
- South East Wales: (1 respondent)
- South West Wales: (14 respondents)

A2.2 We aimed to receive at least two responses from each of the above categories. We have almost succeeded in this, the only significant gap being the geographical area of South East Wales. This gap has arisen due to our local project partner there (the South East Wales Race Equality Council) having to drop out at short notice.

A2.3 Please note that the personal information used for the above table has been given to us in confidentiality for our monitoring purposes, and is not therefore included in the official response sheets.

## **Format of responses received**

A2.4 Responses were received in a number of formats, as follows:

- *Conventional consultation:*  
Hughie Smith of The Gypsy Council submitted his response after we had supplied him with a copy of the original WAG consultation document.
- *Questionnaires:*  
Eleven individuals and groups completed a written response to the plain language questionnaire, after they had been contacted by one of the project partners.
- *Helpline:*  
No responses were received through the dedicated consultation Helpline.
- *Interviews:*  
Six responses were received orally and transcribed by a project partner.
- *Participatory consultation events with young people:*  
Anthony Edwards of Save the Children provided a written report on two consultation events he ran with groups of young Gypsies and Travellers aged 9 to 17, accompanied by drawings by the young people.

## **Reasons given for not participating**

A2.5 Not all the Gypsies and Travellers contacted were willing to get involved in the consultation. Some of the reasons people gave why they wouldn't take part are:

- No time to spare, or not enough notice given for consultation process: (8 people)
- No belief that any change will take place; it's a waste of time: (10 people)
- No payment: (6 people)
- Not interested: (2 people)
- The issues raised are too complicated to understand: (2 people)

## Evaluation of study methodology

A2.6 The following aspects of the study methodology (as set out in Section 2 of this report) are considered to have worked well:

- Working with partners to combine planning expertise with an intimate knowledge of the target group.
- Contacting people personally and asking them to take part. We only received one response in the post, and that may have been from somebody who had not been contacted personally.
- Talking to people face-to-face seemed to be the most effective way of generating interest in the issues raised, and of providing high quality responses.
- Consultees said they appreciated the informal, friendly approach adopted by interviewers.
- Consultees much preferred the plain language briefing over the original circular text, but considered it vital to also have the opportunity to refer to the original for details.
- Consultees appreciated that the consultation pack contained an audio-visual version of the documents, but emphasised that they would always want a hard copy version to accompany any audio-visual material.
- Consultees appreciated the opportunity to remain anonymous, even if they then chose to give their name and contact details.

A2.7 We consider that the following aspects of the study methodology could be improved upon:

- The consultation period (six weeks including the Easter break) was considered to be too short. Many consultees said they would have liked more time to discuss the consultation documents with their communities. Also more time would have made the interviewers' task easier. For example, we haven't had any feedback from the Wrexham area because there was a death in the local Traveller community at the time we were seeking their responses. The same is true for unforeseen events in the interviewers' and other partners' work and personal lives.
- Consultation packs that were merely distributed, without an interviewer asking individuals personally to contribute, did not generate many

- responses. In fact the only response we received anonymously by post may also have been from a person that had been approached personally.
- The telephone Helpline, which was open on four days from 10am until 6pm, did not receive a single call. In the consultation responses, however, three consultees have suggested that their local authorities should collect their views through a telephone Helpline.
  - Respondents tended to stick rigidly to the consultation questions included in the consultation pack. They tended not to give any views other than in answer to the questions, very few used their own paper to expand, and many even sent back the whole consultation pack. Considering that many of the target group are not used to dealing with this kind of document, we might have given more explicit instructions, for example:
    - Make it clearer that thoughts on any part of the document are invited, not only the individual questions.
    - Invite people to use their own (additional) sheets of paper.
    - Leave more space between questions for those respondents who prefer to write on the consultation questionnaire.
    - Insert the questionnaire separately so it can easily be removed, with the return address on the questionnaire itself. This would make it easier to return the completed questionnaire and make it obvious that people are welcome to keep the rest of the pack. It would also offer the opportunity to make photocopies of the questionnaire easily.
  - Many respondents said they had watched 'part of the DVD'. They might have watched more of it had it been more interesting, with more time invested in preparing it, more than one speaker, images, etc.