

BRIAN SUMNER PLANNING  
First Floor,  
23 George Street  
Pontypool  
NP4 6BZ

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**HEARING STATEMENT.**

**NEWPORT CITY COUNCIL LOCAL DEVELOPMENT PLAN EXAMINATION**

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**HEARING SESSION 5 : GYPSY AND TRAVELLER SITES**

**8TH APRIL 2014.**

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**SITE AT : HARTRIDGE FARM ROAD AND RINGLAND ALLOTMENTS**

**FOR : THE RINGLAND MATTERS GROUP**

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**SITE REFERENCE : 3982.**

**OUR REF : BSP/03/14/03**

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## 1.0. INTRODUCTION

- 1.1 This statement sets out the case for the objector, the Ringland Matters Group, (RMG) who have lodged a duly made objection to the Revised Deposit Newport Development Plan (LDP). The Council's reference number is 3982.
- 1.2 The statement follows on from the Deposit Plan Representation made by the Musker Sumner Partnership on behalf of RMG in July 2013. (DPR). The Council rejected the DPR representations to remove the Hartridge Farm Road site as a residential gypsy and traveller site for the following main reasons; as set out in its response to representations which were in brief :

- *the site size at Hartridge Farm is acknowledged to be larger than Welsh guidance suggests. This is done to avoid 'splitting' the three families.*
- *the site is within the settlement boundary and is sustainable*
- *the Road safety centre would need to be relocated whatever use is proposed.*
- *access can be improved with a footpath*
- *the site is well screened from Hartridge School.*
- *the site is a short walk from the retail park*
- *a noise assessment shows that a 1.8m high noise barrier can be achieved*
- *there is no flood risk*
- *the site will be well managed and will work closely with the Police for crime*
- *alternative sites have been assessed*

In relation to the removal of the former Ringland Allotment site :

- *no concern to health from the pylons*
- *the site is in a sustainable location adjacent to the settlement boundary*
- *no access issues*
- *there are no allotments on the site.*
- *a noise attenuation barrier of 2.5m will create privacy and screen from views*
- *no flood risk*
- *the consultation process exceeded statutory guidelines*

- 1.3. This statement now expands on the points previously made where necessary and sets out those matters the objector believes should be addressed by the appointed Inspector at the hearing set out these sites on 8<sup>th</sup> April 2014.

## 2.0. THE OBJECTION SITES

- 2.1. These representations relate to the proposed allocation in the LDP of two sites as follows :
1. The Hartridge Farm Road allocation for a residential gypsy and traveller site for permanent accommodation and;
  2. The former Ringland allotments for either transit or residential accommodation for gypsy's and travellers.



- 2.2. For the Inspectors' information, we reproduce at Appendix 1 a Google Earth map for each of the above two sites on which we show the site proposed and nearby existing residential properties.

### 3.0. THE POLICY REFERENCES OF THE PLAN OBJECTED TO

- 3.1. The policy objected to in the LDP is Policy H16 (i) and H16 (ii). These are to be found at page 76 of the Revised LDP.
- 3.2. The two sites are correspondingly annotated on the Proposals Map East by a purple block colouring and are labelled H16 (i) (Hartridge Farm Road) and H16 (ii); H15 (ii) (former Ringland allotments).

### 4.0. MATTERS AND ISSUES FOR EXAMINATION

- 4.1. The Guidance Notes for Participants, issued by the Inspector, sets out that the purpose of the examination is to examine whether the plan is sound. This is as set out by sections 4.34-4.35 of Development Plan Wales : Policy on Preparation of LDP's. That provides for two broad categories of tests; that relating to legal requirements and that to soundness. The objector does not propose to object on legal grounds to the soundness of the plan.
- 4.2. In relation to soundness, the objector's position is that in relation to this issue, the LDP is not sound. That is because the evidence based used is not robust and therefore cannot be relied upon.
- 4.3. More particularly, the objector's duly made objection sets out in the report submitted, how the evidence base used conflicts with the tests of soundness. These were identified as :
- test C1- regard to other development plans, policies and strategies of adjoining areas;
  - test C2 – regard to national policy
  - test CE1 – coherent strategy and compatibility with neighbouring authorities;
  - test CE2 – realistic having regard to alternatives and a robust evidence base and
  - test CE3 – evidence of implementation and monitoring.
- 4.4 The Council's response to that paper does not state how any of these points have been covered already or are to be addressed except that in relation to national policy, the Council states that it accepts that the Hartridge Farm Road site is larger, by some margin, than that recommended by the Welsh Assembly good practice guidance and attempts to justify this with the argument of not 'splitting up' the three families identified in the area as having 'need'. The Council rely on this position with a 'Part 2' confidential report to committee which is consequently not available for public inspection. In those circumstances, the objector has no confidence that the methodology used in that report or the questions asked of the three families was robust, fair or carried out without prejudice. As such, the objector remains sceptical as that report has not been subject to independent scrutiny yet has been used to justify one large site contrary to national guidance.



- 4.5** Whilst the objector remains sure that the Inspector has a copy of the duly made objection report, a copy is reproduced at Appendix 2 in which it is set out how the tests specifically to make the plan sound have not been met and in the absence of any information from the Council on any of these aspects, they remain submitted as part of the objector's case.
- 4.6.** Those identified failure of the tests of soundness are fully explained in that duly made objection and so there is no need here to repeat them. Rather, this report will now address those 'main discussion matters' identified by the Inspector. These relate to:
- need and overall requirement
  - the site selection process
  - why existing sites cannot continue
  - why is the need to be provided on one site
  - the proposed site's suitability
  - deliverability and manageability of the site

## **5.0. THE LOCATION AND SURROUNDINGS OF THE OBJECTION SITES**

- 5.1.** The two sites are located on the east side of Newport, adjacent to the Southern Distribution Road (SDR) that leads from junction 24 of the M4 and which skirts around the south side of Newport (the A48)
- 5.2.** The Hartridge Farm Road site has the Llanwern school immediately to the east of it and which would be serviced by the same side road (Hartridge Farm road). There are residential properties also served from that side road and which are also directly to the east. There is the main South Wales railway line running along the southern boundary of the site. To the north and on the opposite side of the SDR is residential housing at Ringland. The site is occupied by an animal welfare centre and a driving training school. Apart from those the site is left to wild scrub, trees and grassland.
- 5.3** The former allotment site also lies immediately adjacent to the SDR and at the road junction with a side road that leads to Llanwern village. It is laid to grass and is open to view from along the SDR with little or no, boundary treatment along that frontage. There are some hedgerow trees along the eastern boundary with a wooded area to the south. On the opposite side of the SDR are residential properties. The site has some slope from east to west.
- 5.4.** The maps at appendix 1 show the sites with local features marked.

## **6.0. DISCUSSION MATTERS IDENTIFIED BY THE INSPECTOR**

### **6.1. The need**

The Council has based its 'need' for pitches on the Fordham report it commissioned in 2009 and which was produced in 2010. That identified a 'need' for 23 additional pitches (paragraph 2.4). A pitch is identified in the Fordham report as containing up to three trailers (caravans) (page v – Glossary) and is used for the assessment of accommodation requirements. On that basis, the identified



additional 23 pitches would be up to 69 caravans. Table 8.1 then identifies a further 4 pitch need to 2019, allowing for a 3% annual growth rate. That is 27 pitches (81 caravans) in total needed to 2019. As the LDP covers the period up to 2026, a simple calculation at an extra 7 years growth rate of 3% per annum, gives a requirement of 34 pitches (102 caravans).

- 6.2. The provision in the LDP is for 43 pitches (129 caravans). We cannot find any trace of how this has been calculated but it appears to the objector that such provision is way over the 'need' provision that should be provided for permanent residential pitches, even allowing for additional growth over the plan period.
- 6.3. However, even that estimate in the 2010 Fordham report appears to the objectors to be an overestimation of 'need'. That is because survey information on the current caravan situation in Wales is now available in the bi-annual caravan count. The latest such count is as at July 2013. That shows that there are only 59 caravans (as opposed to pitches) in Newport. These were spread over 10 sites, There were 20 caravans on the authorised sites, leaving 39 unauthorised. Of those 18 are shown as being 'tolerated'. A tolerated site is one where the local authority has decided not to remove the encampment and where it will be allowed to remain for an indefinite period of months or years. Therefore only 21 caravans are on not tolerated sites and therefore by implication, having immediate 'need'.
- 6.4. By contrast the Fordham report found 30 caravans in Newport, of which 28 caravans were on unauthorised sites or encampments as at 2009. Therefore the 'need' for those lacking their own sites or unsuitable sites, has fallen putting further doubt on the very large LDP proposals for a further 43 pitches (129 caravans). What should be provided if 'need' is what should be taken into account, not demand, is 7 pitches (21 caravans) for those caravans not on tolerated sites or at worst, 10 pitches for those not on tolerated sites or on tolerated sites (30 caravans). Adding a growth rate of 3% up to 2026 that would be 11 pitches (33 caravans) or 13 pitches (39 caravans).
- 6.5. The original Fordham report, on which the LDP is, in part, reliant, is difficult for the objector to comprehend. That is because its caravan count found 28 caravans on unauthorised sites for which there was a need to find sites. In accordance with that report's own definitions that a pitch can be up to 3 caravans, there appears to the objectors to be no logic in concluding that 25 pitches were needed to meet that need of 28 caravans because those 25 pitches would provide for 75 caravans. Unless there is a further report, of which we are not aware, that has specific needs of individuals that means the 3 caravans per pitch cannot be met, this seems to the objectors to be particularly unrobust in its methodology.

#### **6.5. The site selection process**

The objectors duly made objection report points out at paragraphs 4.1 to 4.6 (see appendix 2) what are considered the shortcomings of the selection criterion used by the Council in sorting the original 240 sites. These relate primarily to :

- site size
- exclusion of existing sites
- exclusion of rural sites



- 6.6 There are other issues that also come to light when the criterion for site selection are looked at. First is the method itself, which is a 'traffic light' method. That is to say what has been presented to the public, or is in the public domain, is a 'list' of 240 potential sites for gypsy and traveller needs against which a set of criteria are placed with 'red', 'green' or 'amber'. The problem with that method is that it does not identify to the public any weighting or scoring system. This was agreed to be done in the terms of reference of the Scrutiny Committee for Gypsy and Traveller Sites (see page 15 of the Report of the Scrutiny Committee for Community Planning and Development – Gypsy and Traveller Sites SCR)). Thus it becomes impossible to know how each of the criterion applied to site selection has been weighted in cases where the same criteria has a red or amber assessment against it. For example, in that list, The Nurseries at Langstone has a red square and 'yes' against the play area/env. Space criteria. So does the Hartridge Farm Road site. Also the Hartridge Farm Road site has hazard identified as railway and SDR (southern distributor road) as do other sites which have been rejected, for example, the Speedway site. Without knowing what weight is attached to each criterion, how can a reasonable person possibly understand or have confidence in how the Council has not used anything other than its own prejudices or guesswork to distinguish between them? This remains far from clear and accordingly cannot be relied on as being fair or just. The Ringland Matters Group make their own submission on which these points are further explained.
- 6.7. Second is the criterion selected for the site selection process itself. The guidance to be used for such site selection is to be found at paragraphs 17 – 23 of Circular 30/2007 – Planning for Gypsy and Traveller Caravan Sites. Paragraph 18 identifies that local authorities should encourage gypsies and travellers to put forward candidate sites. In the list of the criterion used for the site assessment, (see page 18 – Shortlisting criteria of the SCR), there is no criteria for those sites that might be put forward by that community. This seems to the RMG to be important is site selection to put that group where it would like to be. Neither can we accordingly find any scoring or weighting for the gypsy and traveller preference in the site selection list of any of the sites. The Council has attached weight in its 'process' to consultation with the gypsy and traveller groups. It may well be that those groups did not put any sites forward. In that case it becomes more important to know the locations that meet the working patterns of that group, (paragraph 7 of Circular 30/2007). We do not see this in any of the criterion used in the Council's site selection process and accordingly nowhere is there to be seen any criteria for whether that group should, or could, be retained on their existing sites, whether they have planning permission or not. Paragraph 25 of Circular 30/2007 asks local planning authorities not to *place undue constraints on the development of gypsy and traveller sites*. Whilst existing sites may well be included in the original 'list' there is no criterion or weighting to the existing sites in accordance with national guidance.
- 6.8. Thirdly, paragraph 19 of Circular 30/2007 puts health and well being of the gypsy and travellers as important in respect of maintenance and support of family and social networks. We are unable to find any criteria applied to any site selection process used by the Council that incorporates this element referred to by that Circular. That paragraph also states that site sustainability should not be considered only in terms of transport mode, pedestrian access, safety and distances from services. We can see no application of that principle in the site selection criteria used by the Council. For example, criteria 6 (proximity to



local services) appears to be applied equally, or more so, than other criteria, contrary to the principles of that paragraph in the Circular.

**6.9.** Fourthly, paragraph 20 of the Circular identifies that in deciding where to provide gypsy and traveller sites, all such sites identified for options for a site allocation must have their social, environmental and economic impacts assessed in accordance with the requirements of sustainability appraisal. This, the Council may well argue, has been addressed in the Sustainability Appraisal and Strategic Environmental Assessment. The section of that report on gypsy and traveller accommodation concludes that there are significant positive effects on 6 of the SA objectives with no significant negative effects being predicted. There are 26 such objectives divided into three groups : environmental, social and economic. The detail of the assessment at Appendix J of that document identifies that the Langstone Nursery site, rejected by the Council, showed the least conflict with the SA objectives (2). All of the other sites, including Hartridge Farm Road and the former Ringland Allotments being in conflict with 3. It also identifies data gaps to be filled for 6 objectives and we have not seen any further information that addresses these. Further it is clear that the SEA assessment is on the basis of accommodating all pitches on one site and dismisses some for this reason. (paragraph J.1.23 – yard at A449). As such the SEA is only as good as the information provided to it by the Council and as we have seen, this is flawed.

**6.10** Fifthly, the Circular refers to social impacts. This is interpreted in the SEA objectives as SA objective 14, improving equal opportunity, the criteria of which is not being located near or within a ward which is one of the 100 most deprived in the country. Table J.4 of the SEA shows the Hartridge Farm Road site and the Ringland allotment site as being in conflict with this criteria. The members of the RMG will present their own views on this aspect as they are better informed living in this area. However it seems to us incredulous that the search criterion the Council has used to identify sites has not included this aspect, as to put a large gypsy site next to such an identified deprived area can lead to none other than conflict.

#### **6.11 The existing sites.**

There are 10 sites used by gypsy and traveller groups in Newport (Welsh Assembly Caravan Count returns 2013). On those there are 20 authorised caravans and 39 unauthorised. Of the 39 unauthorised, 18 are on 'tolerated' sites.

**6.12** The Fordham report recommends to the Council to regularise existing sites of which, at that time there were 9. (it is now 10 because of a lapse of a temporary permission) with 7 of those being unauthorised. The Council incorporated those into its original 'list' of sites and assessed them accordingly. However, those criteria excluded rural sites, which most of these are, because of proximity to services. Paragraph 26 of Circular 30/2007 points out that sites on the outskirts of built up areas may be appropriate as are ones in rural settings and that the over rigid application of national or LDP policies that seek a reduction in car borne travel would not be appropriate. It appears to us that there is no application of these principles to the existing sites, which if assessed at all, have had the same criteria applied as the new sites and those criteria included proximity to services.



Had the Council applied the national guidance and assessed the existing sites first that may well have affected or influenced the search for new sites.

- 6.13** The Council make great play of the late consultation it took with the gypsy and traveller community (after the Cabinet meeting held on 13 May 2013) that, allegedly, resulted in all the adults of the three families stating that they would prefer to be at the Hartridge Farm Road site as opposed to one of the other options detailed in the Scrutiny Committee report. As far as we are able to determine, there was no option put to them to remain where they were as that option is not included in the Scrutiny committee report. There is no assessment undertaken by the Council as to that option. There is no assessment as to the financial implications of pursuing that option, or that option in combination with a selection of others. There is a 'part 2' report considered by the committee as to financial implications but that is not available for public view. We would like to know if there is any financial assessment for the existing sites and how this compares to the options the Scrutiny committee considered. We suspect that there is not one. The RMG will put forward their own views and report on the 'option' given to the gypsy and traveller groups that resulted in the 'preference' for the Hartridge Farm Road site which, it will be said, was put in such a manner that the Hartridge Farm Road preference was bound to result.

#### **6.14 The single site provision**

It is well provided for in the Welsh Assembly's Good Practice Guide that the ideal size of a site should be no more than 12 pitches (using Fordham's criteria that would be 36 caravans). (paragraph 3.1 of that Guide). The reason stated for this is because that size is more likely to attract compatible *family units*. It goes on to state that it may be necessary to be flexible by allowing sites of between 15-20 pitches when taking into account local circumstances and sites bigger than 20 pitches should only be developed where there is a clear and demonstrable need and consultation and engagement has taken place with all stakeholders.

- 6.15.** The Council attempt to justify the overly large allocation at Hartridge Farm Road by using the site layout to separate the three families, in effect creating three small sites within the whole. The committee considered a 'layout' that attempts to show this. The reason the national guidance provides for the site size that it does is because it is a way of reducing potential conflict between family groups, which occurs in the gypsy and traveller community. That is why paragraph 3.1 of the guidance states compatible family units. The layout considered at Hartridge Farm Road has a shared single access for two of the largest groups and a further access close to the SDR roundabout for the smaller third. The use of the shared access for the two larger groups is not separating them and will lead to conflict, much to the detriment of immediate existing houses opposite. The access point to the smaller third group is in any event so close to the SDR roundabout as to be dangerous. Whilst the Council may well argue that site management and features will help the separation of the family groups, it is more likely that because of the proximity of the groups to each other, barriers and fences will become the norm to give that separation, which does not occur naturally on a large open site such as this. If that is the only way to accommodate the family groups it is not good practice, will give rise to an unsightly site such as have been reported nationally and does not aid the gypsy and traveller community cause or their integration with local communities.



- 6.16** Further, the layout shown does not provide for animals such as horse to be kept or provide for economic activities. In effect, the layout proposed has been treated as a standard residential layout and that is not what a gypsy and traveller site of this size will be. The layout proposed for the Ringland allotment site is even worse. That requires a 1.8 or 2m fence all round it for the SDR and has a single line of pitches with a road all the way round it. That is because of the site configuration and again shows that the site selection criteria used has paid no regard to how the site will look when implemented.
- 6.17** The attempt by the Council to create three small sites within one at Hartridge Farm Road is an attempt to camouflage the fact that it is a single very large site. A site of this size will swamp the immediate small community around that is already there as it is, by nature many times the scale, by caravan numbers, than the number of houses around it. This is detrimental to those existing residents in terms of the potential disparity between the settled and gypsy/traveller communities.

### **6.18 Other concerns**

The Hartridge Farm Road site is currently allocated in the adopted UDP as an environmental space. These are identified in Policy CE33 as being protected for their importance for their visual qualities, wildlife habitats or recreational or amenity purposes. This allocation requires the removal of that designation and as the proposed layout of the large site shows, there can remain no provision on the site for any of that provision because it would be covered in development and hard areas. We see no change to the physicality of the site that merits a change to that already acknowledged important provision. This appears to have been completely disregarded in the Council's search criteria or if it is acknowledged, is off handedly overridden as being of little, or no, importance. The deposit LDP did show the site for new housing which, we presume was done to aid the local authority receipts, used, we presume to offset the monies spent at Llanwern school adjacent. The gypsy and traveller site presents no such provision and so there is no over-riding need to develop an already identified important environmental space. Clearly that intended housing provision is now met elsewhere.

- 6.19** The importance of the site as an environmental space can be judged when visiting it. Whilst it is in the urban area, it is on the edge of that area forming the transition between urban and country. It is therefore a 'greenfield' site which are not given preference in terms of any sequential search for sites. The search criteria used by the Council appears to have no regard as to whether a proposed gypsy and traveller site could be used to enhance previously developed or untidy or derelict land, which in our submission would gain priority over the greenfield and pleasant sites both at Hartridge Farm Road and Ringland allotments. That is because a well planned gypsy and traveller site could have a positive enhancement of the environment. There is no such enhancement at either of these sites. This is suggested at paragraph 27 of Circular 30/2007 but does not appear to have been given any acknowledgement by the Council. We have further doubts about the SEA on this point which states that there are no negative effects from the gypsy and traveller designations but identifies this as a breach of SA objective 3 which addresses the minimising of loss of greenfield land to development and is identified in the tabled criteria as a negative impact but is not given any reference in the report findings.



- 6.20** The 'one site fits all' solution proposed by the Council in putting all three families on one site causes us further difficulties. Paragraph 22 recognises that some gypsy and travellers run businesses from their site and therefore require mixed business and residential uses. It asks local authorities to consider the scope for identifying separate sites for residential and business purposes in close proximity to each other. We can see no provision for this on either the Hartridge Farm Road site or the Ringland allotment site and neither can we see any criteria the Council has used in its search that might meet this identified need. Had it done so and followed that Government guidance, the 'one site fits all' solution may not have been so strongly promoted. Appendix J of the SEA also runs with the idea of a one site fits all solution identifying that this could result in community buildings for the groups on site but does not consider on site employment or animal needs of those groups. The SEA further states that the Hartridge Farm Road site is the only site that is large enough to accommodate two of the three families, which will require 13 pitches and 23 pitches. This results from data supplied by Newport Council which, as we have shown, is not accurate or necessary as to the number of pitches needed. If that requirement is addressed, as we have suggested, this will alter the SEA conclusions.

## **7.0. HOW THE PLAN IS TO BE MADE SOUND**

- 7.1.** It is clear that the revised LDP was done in the most part, as well as others, to provide for gypsy and traveller needs as the original LDP, placed on deposit, did not make such provision. Accordingly, Newport Council has rushed out its policy for such provision. It has not included the gypsy and traveller community from the outset, as demonstrated by the instructions at the Cabinet meeting of 13th May 2013 to consult the gypsy and traveller groups on site preference (the RMG will make their statement as to the prejudicial way this was done). They should have been asked from the outset for their preferences and those preferences identified in the public consultation exercise so that the public could have known where those groups would like to be. The requirement for the number of pitches should have been assessed firstly having regard as to whether any could be met on the existing sites, whether authorised or not. This may have affected the site size and therefore the search criteria. The search criteria themselves should have included elements that are identified in national guidance and this was not done.
- 7.2.** We put it that the Council needs to start again on this issue. It needs to ask the gypsy and traveller community where it would prefer to be before any sites are identified and clearly set out what the needs of the families actually are. These need to be incorporated into the site search criteria together with a detailed assessment of the existing sites, bearing in mind the Government guidance to be co-operative with them. It can then use these results to redefine the numbers of pitches required and that will affect the site search. It needs to include search criteria for the improvement of derelict and underused land. It needs to distinguish between those that require privately owned sites and those that require socially rented sites. It needs to set out the travel patterns of the gypsy and traveller groups and how they fit in to the site search criteria and it needs to interact with and find out what adjoining authorities are doing and what provision they are making, particularly for transit sites and how this, if at all, affects the search criteria for sites.
- 7.3** The RMG representatives and their advisers have struggled with the complexity of papers, committee meetings, reports consultation exercises and Government



guidance on this issue as to be somewhat confounded by that complexity to easily understand the process that the Council has used to reach its revised LDP designations. What is needed is a clear and concise document that sets out all the processes undertaken, when and why. The consultation exercise on the revised LDP has been at different stages of that process and limited in its extent such that it is not easy to see the whole picture and therefore the RMG feels prejudiced against in its ability to respond comprehensively. Therefore the whole process should be redone, re assessed and re consulted on.



## **APPENDIX 1**

### **GOOGLE EARTH SITE MAPS**





school

Hartridge Farm Rd, Newport NP18, UK

proposed pitches

existing houses

existing road safety centre and rspca

© SPOT-IMAGE

Image © 2014 Aerodata International Surveys

© 2013 Google

Google

Imagery Date: 12/10/2009 29°56'11.35" N 2°56'11.35" W elev



## **APPENDIX 2**

### **COPY RMG REPORT TO THE COUNCIL JULY 2013**



**The Farthings  
4 Fields Park Gardens  
Newport  
NP20 5BQ**

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**REPORT ON THE NEWPORT LOCAL DEVELOPMENT PLAN WITH REFERENCE  
TO THE GYPSY AND TRAVELLER SITE ALLOCATIONS AT HARTRIDGE FARM  
ROAD AND RINGLAND ALLOTMENTS.**

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**FOR : THE RINGLAND MATTERS GROUP.**

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**DATE : July 2013.**

**OUR REF : MSP.13.2050**

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Partners: Philip A Musker - Principal  
Brian Sumner BA (Hons) MRTPI - Chartered Town Planner  
Rhys J Llewellyn BA (Hons) Wales ATT

Associates: Richard J Musker BA (Hons) PG Dip Arch MA

e-mail: philip@musker-sumner.co.uk  
e-mail: brian@musker-sumner.co.uk

Kenneth R Davies BSc, C Eng, MI Struct E



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## 1.0 INTRODUCTION

- 1.1 MSP are instructed by the Ringland Matters Group ( 'the Group') to report on the Revised Deposit Newport Local Development Plan, ( the 'revised LDP') issued for consultation and comment to interested parties. The group has been set up to look at the proposed 'allocation' in the deposit LDP of the residential and transit gypsy and traveller sites at Hartridge Farm Road and the Ringland allotments. This report therefore looks at and assesses the gypsy and traveller aspects of the deposit LDP.
- 1.2. This report is made to the group and we acknowledge that it can be submitted to Newport City Council by the group as a duly made representation to the revised LDP.
- 1.3. In line with the requirements of the Local Development Plan Wales (LDPW) and its accompanying regulations 2005, this report sets out to apply the test of 'soundness'. These tests are set out in terms of 'procedural'; 'consistency' and 'coherence and effectiveness'. In this assessment, the key tests of consistency and coherence and effectiveness have been looked at. We have not paid regard to procedural matters as they relate to compliance with the Delivery Agreement, the Community Involvement Scheme and Sustainability Appraisal and Strategic Environmental Assessment, which are matters for the Government to address.
- 1.4. However, one procedural matter that does arise is the issue concerning the issue of the revised LDP itself. This revision follows the placing on deposit of the LDP in its original form in 2012. In relation to the groups' interest, that original deposit plan had gypsy and traveller site allocations on land well away from them and so had no effect to them at all. The revised LDP is said to be made by the Officers of the Council under regulation 17 of the 2005 LDP Regulations.
- 1.5. We have looked accordingly at part 17 of those regulations, which deal with how to make a deposit plan. We can find no provision in them for a revised LDP once it has been placed on deposit. Rather, any changes should be dealt with by way of 'focused changes' to the plan, whereby the appointed Inspector can only make changes to the plan, and these are by way of directions the Council must then follow. The Council has agreement from the Welsh Assembly that a revised LDP may be '*the best way forward*',<sup>1</sup> but under the regulations there is no provision for such a revision to be made. Therefore the original deposit LDP should have gone forward to examination with its original gypsy site allocations. The group therefore believe that the revised deposit LDP has been 'concocted' by the newly elected Council and rushed through to avoid those newly elected members having a 'gypsy' site in their own wards. Thus the revision is a political one, not one based on the regulatory requirements. The group find therefore the revised 'process', particularly in relation to the gypsy and traveller site allocations to have been carried out 'in a rush' with incumbent shortfalls, which this report will highlight. We find this 'rush' unsurprising, given that Newport's LDP production is far behind the originally intended four years from 2005, as set out in the 2005 regulations and is now one of the last to be produced in Wales.

<sup>1</sup> email from Welsh Assembly to newport Council dated 20th February 2013.



## 2.0. THE TESTS OF SOUNDNESS

2.1. The Planning Acts require all LDP's to be subject to an examination by an independent Inspector. That appointed Inspector will assess the *soundness* of the plan. That test of soundness relates to the policy content of the plan and the process for its production. Under these headings, there are '10' tests identified against which the test of soundness will be applied<sup>2</sup>. We have identified five of those 10 tests which are applicable to the concerns of the group. These are :

- test C1 - regard to other development plans; policies and strategies of adjoining areas;
- test C2 - regard to national policy
- test CE1 - coherent strategy and compatabilty with neighbouring authorities;
- test CE2 - realistic having regard to alternatives and a robust evidence base and;
- test CE3 - evidence of implementation and monitoring

These tests we now go on to accordingly apply.

## 3.0. TEST C1

- 3.1. Section 225 of the Housing Act 2004 requires local authorities to assess the needs of gypsy and traveller accommodation. Guidance on how that is to be assessed sets out that it may be beneficial to *'work in partnership at sub regional or regional level'*<sup>3</sup> and *'early discussions should take place with other authorities in the region to identify the scope for partnership working'*<sup>4</sup>.
- 3.2. Circular 30/2007 states that, following the guidance for Local Market Housing Assessments, the circular guidance *'strongly recommends that local authorities work in partnership with neighbouring authorities as travelling patterns are liable to cross local authority boundaries'*<sup>5</sup>.
- 3.3. Despite the above national guidance, the Council's gypsy and traveller strategy in the revised LDP is based, almost solely, on the findings of the Fordham report, published in 2010. Having looked at that report, we can find no recommendation or assessment of any cross boundary working with adjacent authorities. This may be because this aspect was not included in the Council's brief to Fordham's. In any event that needs' report can only be used to inform the Council's policy, it is not the policy itself. However, the revised LDP policy appears to be based solely on it, thereby completely ignoring the policy advice of Government and thereby, in our view, failing to meet test C1 of the LDP regulations.

<sup>2</sup> LDP Wales paragraph 4.32 <sup>3</sup> paragraph 29 Local Market Housing Assessment Guide

<sup>4</sup> paragraph 31 Local Market Housing Assessment Guide <sup>5</sup> paragraph 10 of Circular 30/2007



**3.4.** The Government's overall approach to gypsy and traveller provision has been assessed numerically, and this is estimated to be between 275 - 305 families to meet need and family increase to 2011<sup>6</sup>. Whilst these figures can be further revised as a result of each local authority carrying out its own needs assessment, there is no paper, policy or report in the revised LDP which shows how provision in adjoining authorities or across the region or sub region has been taken into account, affects or otherwise the projected needs base for Newport or its gypsy -traveller provision. For example, in relation to the provision of transit sites, Circulars 30/2007 makes it clear that such provision is an across boundary issue. We are aware, for example, that Cardiff is actively seeking a major transit site along the M4 corridor and yet in the revised LDP no account is taken as to whether or not such provision will meet the transit needs of Newport from such a site, which will be only a few miles away and on the major transport links through the region, therefore meeting transit needs. Without any such assessment, transit provision in this revised LDP is fundamentally flawed as it ignores the Government's approach to such provision. On permanent sites, the same applies. That is that the numbers required to be provided may (or may not) be affected by provision in adjoining or nearby authorities. No assessment is made, so the revised LDP assumptions on numbers required to be provided in the Newport area cannot be relied on as 'need' in the area, because there is no apparent basis to assess that need in the region. There is no assessment as to how the numbers of permanent pitches proposed for Newport in the revised LDP affect or otherwise the overall provision in the region, or Wales as a whole. It cannot therefore be known whether the overall targets identified by the Government's own assessment is met or whether an overprovision is made and whether that overprovision will result in immigration from other areas if such overprovision is made, to the detriment of Newport residents. We say there is a detriment because it is acknowledged that a gypsy or traveller site adjacent to existing housing will result in community disharmony<sup>7</sup>.

#### **4.0. TEST C2**

- 4.1.** The most obvious conflict with national policy in relation to gypsy and traveller sites in the revised LDP is the size of the permanent site proposed at Hartridge Farm Road. 43 pitches are proposed at the site, which could be the equivalent of 172 individual caravans ( assuming 4 caravans per pitch). National guidance on site design of such sites set out quite clearly that they should ideally be no more than 12 pitches and taking into account local circumstances and need, no more than 15-20 pitches<sup>8</sup>. The proposal at Hartridge Farm Road is over twice that recommended size, completely in conflict with that national guidance and therefore a failure of test C2.
- 4.2.** We have had a look at the selection criterion used by the Council for site selection of gypsy and traveller sites. The actual criteria used by the Scurtney Review Assessment in 2012, relate to various points but none relate to site size<sup>9</sup>. This is despite the fact that

<sup>6</sup> Accommodation needs of gypsy-travellers in Wales <sup>7</sup> Paragraph 3.115-3.119 Accommodation Needs of **msp** Gypsy-travellers in Wales <sup>8</sup> Paragraph 3.1.1 Good Practice Guide in Designing Gypsy traveller sites in Wales 2009.

<sup>9</sup> Gypsy and traveller sites background paper.



in that same paper, it is outlined that consultation by the Council with the gypsy and traveller community in 2010, revealed that a '*small site*' was desirable (it is in fact placed at the top of the list<sup>10</sup>). This however appears to have been ignored. We can find no paper or report either in the LDP or its documents that sets out why a site 3.5 times the size (43/12) of that recommended in Government guidance is proposed. This the Council is required to do if this part of the test C2 is to be met.

- 4.3.** National policy requires that the gypsy and traveller community be involved at an early stage in the preparation of LDP's. The Council's Gypsy and Traveller accommodation background paper states that since 2010, the Council has dramatically increased its interaction with that community. However, we can find no papers to the revised LDP that set out what those consultations were, what questions or what options were put to that community. Thus that part of the LDP process is not transparent enough to enable other stakeholders, such as the community around the proposed residential site, to assess how extensive or appropriate that consultation has been or whether the proposed allocation reflects that community's desires and wants. Whilst this should be set out in the Community Involvement Scheme as part of the LDP process, we have still been unable to identify for example, if any of the suggested sites were put forward or proposed by that community. What is clear is that the Council's selection criterion used for the site selection does not have any criteria based on whether the gypsy and traveller community want the sites or not. That runs contrary to Government advice because it is not identified to what extent the sites put forward arise from work with the gypsy and traveller community, whether they are suitable for them or which, if any sites, are put forward by them. This should be made clear and transparent in the LDP and in accordance with Government advice<sup>11</sup>. Further, without such information being readily available and transparent, it cannot be relied upon as fully informing the LDP process and hence, site selection.
- 4.4.** On the matter of site selection, the criterion the Council has used appear to be selectively ignoring Government guidance as to what, and what weight, should be attached to them. The criterion used for site selection in the first and second rounds relate primarily to avoiding environmentally sensitive areas, proximity principles (including settlement boundaries) and whether or not the sites are owned by the Council.<sup>12</sup> Circular 30/2007 sets out that in terms of site selection, sites in, or near, existing settlements should be considered first. However, it also states that rural settings are acceptable in principle. In such areas it states that over rigid application of national or LDP policies that seek a reduction in car borne travel would not be appropriate<sup>13</sup>. It seems to us that the selection criteria used by the Council by applying the settlement boundary/rural exception criterion, discounts automatically this part of possible sites suitable in accordance with that Government guidance. In other words, all rural sites are dismissed. That is not what Government guidance says and so again, the selection process fails test C2 as no such sites have been considered.

<sup>10</sup> paragraph 3.7 Gypsy and traveller accommodation background paper.

<sup>11</sup> see paragraph 18 of Circular 30/2007.

<sup>12</sup> paragraph 3.8 Gypsy and Traveller sites background paper.

<sup>13</sup> paragraph 26 Circular 30/2007.



- 4.5.** National guidance on site constraint policies also seem to have been ignored on the sites selected in the revised LDP for gypsy and traveller accommodation. The transient site proposed at Llanwern is steeply sloping and has national grid pylons over it. Not only that, but the site sits on the side of one of the main, if not the main, arterial roads into and out of Newport. The site is clearly visible by users of that road. Placing the site here has the potential to undermine the well landscaped visual amenity of the rest of that route, to the detriment of the well being of Newport as a whole.
- 4.6.** The Hartridge Road residential site has the main railway line along its southern border and the main SDR route to the north. This will create noise for that site unsuitable for residential occupation and be a potential hazard. Whilst there are underpasses under the DTR route, these are unpleasant and not used. Local knowledge confirms that they have been used as 'ambush sites' in the past. Planning guidance advises against putting such sites near hazards<sup>14</sup>.

## **5.0. TEST CE1**

- 5.1.** We have already largely covered the point of compatibility with adjoining authorities in the section on test C1, which is regard to be had to the development plans of adjoining authorities. We can find no report or assessment of any regard to what provision adjoining authorities are making for gypsy and traveller provision or how this may affect provision or otherwise of such sites in Newport. Whilst each authority has to make provision for its own communities it may contain, national guidance makes it clear that gypsy and travellers are a cross boundary issue and therefore any strategy should account for provision or otherwise in adjoining authorities.
- 5.2.** It seems to us to be unsurprising that such a cross boundary approach has not been undertaken in the revised LDP. That is because the gypsy and traveller issue has only recently been tackled in the LDP evidence base since 2010 and given the priority of the Council to now issue its LDP (as it is far behind its timetable), the Council has simply taken the short route of applying directly the 'need' identified in the Fordham report and applied it to a single site.
- 5.3** Given that there is no evidence base showing how Newport's provision fits in with or is affected by adjoining authorities or how the provision for such sites fits in with the Government's projections for gypsy and traveller sites in Wales<sup>15</sup>, and there is no evidence of cooperation between Newport and any other authority<sup>16</sup>, this test is also failed.

## **6.0. TEST CE2**

- 6.1.** The revised LDP strategy for gypsy and travellers relies, almost solely, on the Fordham needs assessment. The strategy simply takes the findings of that report in terms of numbers and then finds a site big enough to accommodate it. That is

<sup>14</sup> paragraph 3.2.2 Good Practice Guide in Designing Gypsy and Traveller Site in Wales

<sup>15</sup> Good Practice Guide in Wales

<sup>16</sup> Circular 30/2007 paragraph 23



not a realistic means of approaching a strategy for gypsy and traveller sites.

- 6.2.** The Fordham report finds that the 'need' in Newport is for 29 additional residential pitches over the next 10 years<sup>17</sup>. The revised LDP strategy is to provide for 43 additional residential pitches.<sup>18</sup> This difference in numbers of pitches to be provided is only explained in the background paper as '*through this interaction*' - that being interaction with the gypsy and traveller community since the production of the Fordham report in 2010. We can find no report or assessment in the LDP which explains how this figure is arrived at or why. The Fordham report arrives at the figure of 29 additional residential pitches as that includes an allowance of 25 pitches to accommodate need as it stands now and a 3% growth factor<sup>19</sup>. Even allowing for natural growth beyond 2019, as allowed for in the Fordham report, to 2026, the figure does not come anywhere near the 43 pitches put forward in the revised LDP. Without the evidence base to clearly show how this figure of 43 pitches is arrived at in the LDP, the base for it is not robust and is unrealistic, thereby failing test CE2.
- 6.3.** The methodology for the revised LDP for gypsies and travellers is to place all the residential pitches on one site, namely Hartridge Farm Road. We can find no rationale for why that method of dealing with this issue is adopted in the revised LDP as the methodology for doing so is not explained. Further the policy is to provide all the projected need of 43 pitches at once (the Council say the site will be 'phased' but we do not consider that to be realistic once the site is operational). Again it is not explained in the LDP documents why this should be the case. The Fordham report identifies that 25 additional pitches are needed in Newport over the next ten years<sup>20</sup>. Of these, the Fordham report recommends that 14 pitches should be provided on social rented pitches (i.e. Council or public body owned) over the next five years.<sup>21</sup> The policy for gypsy and traveller provision is not however designed in this way if all the pitches for the whole LDP period (including the extra 14 over and above the Fordham report to make the total of 43 pitches proposed) are to be provided on one site. We cannot see any control mechanism in the revised LDP to achieve phasing. It is more realistic that once the site is operational, it will simply 'fill up' from the start. This is especially so as such a large site will attract 'overspill' from adjacent authorities and we have already pointed out that that issue has not been addressed in the revised LDP.
- 6.4.** It seems to us therefore that the revised LDP strategy for gypsy and traveller provision is not realistic in that it is not formulated to reflect the findings of the needs assessment. When looking at approaches in other areas, for example Pembrokeshire, the LDP, (which has been accepted as sound by an Inspector), their approach is to make some initial provision and then by review periodically, to have further sites if found to be needed. Thus the site provision is spread out on smaller sites over a longer period if shown to be needed by review. We are not aware that this revised LDP has

<sup>17</sup> paragraph 26 Gypsy and Traveller Accommodation Assessment 2010. (the Fordham Report).

<sup>18</sup> paragraph 204 Gypsy and Traveller background paper.

<sup>19</sup> table 8.1 the 'Fordham' report.

<sup>20</sup> paragraph 8.9 the 'Fordham' report.

<sup>21</sup> paragraph 9.2 Fordham report



considered, or it is not shown in the LDP documents, any alternative strategy for site provision over the plan period. This it could have done if the Fordham report had been interpreted differently. Thus the revised LDP is not realistic having regard to alternatives and thus the strategy adopted is not based on a robust evidence base. Test CE2 is also therefore failed

- 6.5.** The identified problem in the revised LDP strategy of providing the gypsy and traveller site 'en mass' in those numbers at the Hartridge Farm Road site is that it will overwhelm the existing residential population there, which is small scale and rural in the lanes behind Llanwern High School. A traveller/gypsy site of this size, which will also have to provide on site employment facilities, storage, livestock provision, will completely change the character of that area for those residents, not to mention for the two adjacent schools. That is not a sound basis on which to formulate the strategy for traveller/gypsy provision, which as guidance suggests, ought to be formulated to allow better integration and inclusion with existing local communities.<sup>22</sup>

## **7.0. TEST CE3**

- 7.1.** The LDP is required to show evidence of how the suggested sites are to be implemented and how they are to be monitored. The reason for the monitoring is so that the LDP can be adjusted to suit new or changing circumstances.
- 7.2.** With regard to implementation of the Hartridge Farm Road site and the Ringland allotment site at Llanwern, obvious problems are evident for which we cannot find any evidence in the LDP as to how they are to be addressed. First, with regard to the transit/residential site at Llanwern, this is an allotment site. There is specific legislation covering allotments. They are the Small Holdings and Allotment Act 1908 and The Allotments Act 1925. In brief, these set out that land purchased by local authorities as allotments must not be disposed of without Ministerial Consent.<sup>23</sup> We can find no evidence in the LDP of such consent being obtained. That consent requires provision to be made for allotment holders displaced. We can see nowhere in the LDP that allows for this. Further, local authorities must assess the demand for allotments in the area and if there is, there is a statutory duty to provide them. Further still, allotments form part of the amenity provision of open and recreational space in an area. We can find no calculation as to whether the loss of the allotments to a transit/residential site use would lead to a shortfall of such provision in the area.
- 7.3.** Second, as regards the residential site at Hartridge Farm Road, there are existing uses on that land which are the RSPCA and the Road Safety Centre. We understand these are on a long term lease from the Council. Lease provisions are set out in terms that they have to be renewed, unless the occupier chooses not to do so. We cannot find any reference in the LDP as to how these uses will be dealt with. Should they remain in situ, there will be conflict of use between them and the proposed residential gypsy/traveller site, particularly the RSPCA centre in terms of noise from animals, particularly dogs, much to the detriment of neighbours around the site.

<sup>22</sup> paragraph 8 Circular 30/2007

<sup>23</sup>Section 8 Allotments Act 1925



- 7.4. The Welsh Assembly Government requires a biannual caravan count to be done in each local authority area<sup>24</sup>. The revised LDP policy with regard to gypsy and traveller sites proposes a 'once and for all' solution by placing all perceived 'need' on one residential site. This 'up front' loading of the policy does not allow for any variation in need that may occur over the plan period and this will be known as a result of the required caravan counts. This not only inflexible, but also no policies are allowed for in the revised LDP for possible adjustments, up or down, to numbers needed. The policy approach should, in our view, be aimed at providing the immediate 14 pitches on Council or public body owned land with the other 15 pitches provided on smaller private sites, as the Fordham report suggests. The additional pitches taking the number up to 43 should not be included at this stage, but a flexible policy introduced into the LDP to take account of the biannual counts. In this way, the swamping of an existing community by such a large residential site could be both avoided initially and dealt with as part of the review process of the LDP. This would allow for monitoring to take place. As the revised LDP policies do not do this, in our view, test CE3 is failed as there is no provision for monitoring in the revised LDP with regard to gypsy and traveller provision.

## 8.0. SUMMARY AND CONCLUDING REMARKS

- 8.1. In our review of the revised LDP with regard to gypsy and traveller provision, we have found a number of shortfalls as regards to the test of 'soundness' to be applied. As an overview, we are not surprised as looking at the overall process, it appears to us that the gypsy and traveller policy has attempted to be revised as part of the LDP process in a very tight timescale. This is not helped by the single residential site chosen to accommodate the perceived need, which will result in one of the largest residential gypsy/traveller sites in Europe. This will totally swamp the existing local Hartridge community and such provision flies in the face of national policy for such sites with regard to size. Neither is the revised LDP further helped by the apparent dismissal in the site selection criterion of existing or unauthorised encampments or any site outside the urban boundary. That is not what Government guidance on this issue sets out. Further, we can see no evidence in the revised LDP of any cross boundary liaison or any assessment as to how the policy put forward fits in with adjacent strategies or the regional picture of the provision for residential and, in particular, transit sites. Without that being done, we fail to see how the revised LDP can be judged to be sound as the evidence base used is not robust and cannot be relied on.

<sup>24</sup> Introduced following the Accommodation Needs of Gypsy and Travellers in Wales 2006



## **APPENDIX 3**

### **GYPSY AND TRAVELLER CARAVAN COUNT JULY 2013**



SDR 160/2013 (R)

13 December 2013

**Gypsy and traveller caravan count, July 2013 - Revised**

This Statistical Release presents the most recent results of the bi-annual Gypsy and Traveller Caravan Count conducted by local authorities in Wales. It sets out the number of Gypsy and Traveller caravans on authorised and unauthorised sites in Wales, and details of pitches on local authority sites, on 18 July 2013. The Count is carried out in January and July every year. It forms part of the evidence base when assessing bids from local authorities for the Gypsy and Traveller New Sites Grant and Gypsy and Traveller Refurbishment Grant.

Further background and quality information can be found at the end of this release. The counts are voluntary for local authorities and 21 responded in this count. Powys failed to do so. Note that totals in this document are for the 21 local authorities that responded, not for the whole of Wales. Note also that the number of caravans in Welsh local authorities is affected by seasonal fluctuation.

**Totals for the 21 local authorities that responded**

- On 18 July 2013, 982 Gypsy and Traveller caravans were reported in Wales.
- 90 sites were reported across Wales. The number of caravans on a site ranged from 1 to 115.
- Across the 21 local authorities that participated in both the July 2012 and July 2013 count, the total number of Gypsy and Traveller caravans has increased by 19 per cent (154 caravans) and the total number of sites (both authorised and unauthorised) has increased by 7 per cent (6 sites).

**Authorised sites for the 21 local authorities that responded**

- There were 778 caravans on authorised sites with planning permission, accounting for 79 per cent of all caravans. Of these, 557 (72 per cent) were on local authority sites and 221 (28 per cent) on private sites.
- For the 21 local authorities that participated in both the July 2012 and July 2013 count, the number of caravans on authorised sites has increased by 14 per cent (97 caravans) since the July 2012 count. This increase is largely due to the increase in caravans on local authority sites in Cardiff, Pembrokeshire, Flintshire and Merthyr Tydfil.

**Unauthorised sites for the 21 local authorities that responded**

- There were 38 caravans on unauthorised sites on land owned by Gypsies and Travellers, accounting for 4 per cent of all caravans.
- A further 166 caravans (17 per cent of all caravans) were on unauthorised sites not owned by Gypsies and Travellers.
- Across the 21 local authorities that responded in both counts, the number of caravans on unauthorised sites was 39 per cent (57 caravans) more in the July 2013 count than in July 2012.

**Gypsy and Traveller Sites provided by Local Authorities for the 21 local authorities that responded**

- There were 349 pitches on Gypsy and Traveller sites provided by local authorities in Wales on 18 July 2013.
- Of these, 348 were residential pitches and 1 was a transit pitch. 97 per cent of the residential pitches were occupied and the 1 transit pitch was also occupied.
- The total number of pitches has decreased by 6 per cent (21 pitches) for the 21 authorities that participated in both counts.

**Statistician:** Lucy Taylor**Tel:** 029 2082 6023**Email:** stats.inclusion@wales.gsi.gov.uk**Next update:** March 2014 (provisional)**Twitter:** [www.twitter.com/statisticswales](http://www.twitter.com/statisticswales) | [www.twitter.com/ystadegaucymru](http://www.twitter.com/ystadegaucymru)

Cyhoeddwyd gan Y Gwasanaethau Gwybodaeth a Dadansoddi

Llywodraeth Cymru, Parc Cathays, Caerdydd, CF10 3NQ

Ffôn – Swyddfa'r Wasg **029 2089 8099**, Ymholiadau Cyhoeddus **029 2082 3332****[www.cymru.gov.uk/ystadegau](http://www.cymru.gov.uk/ystadegau)**

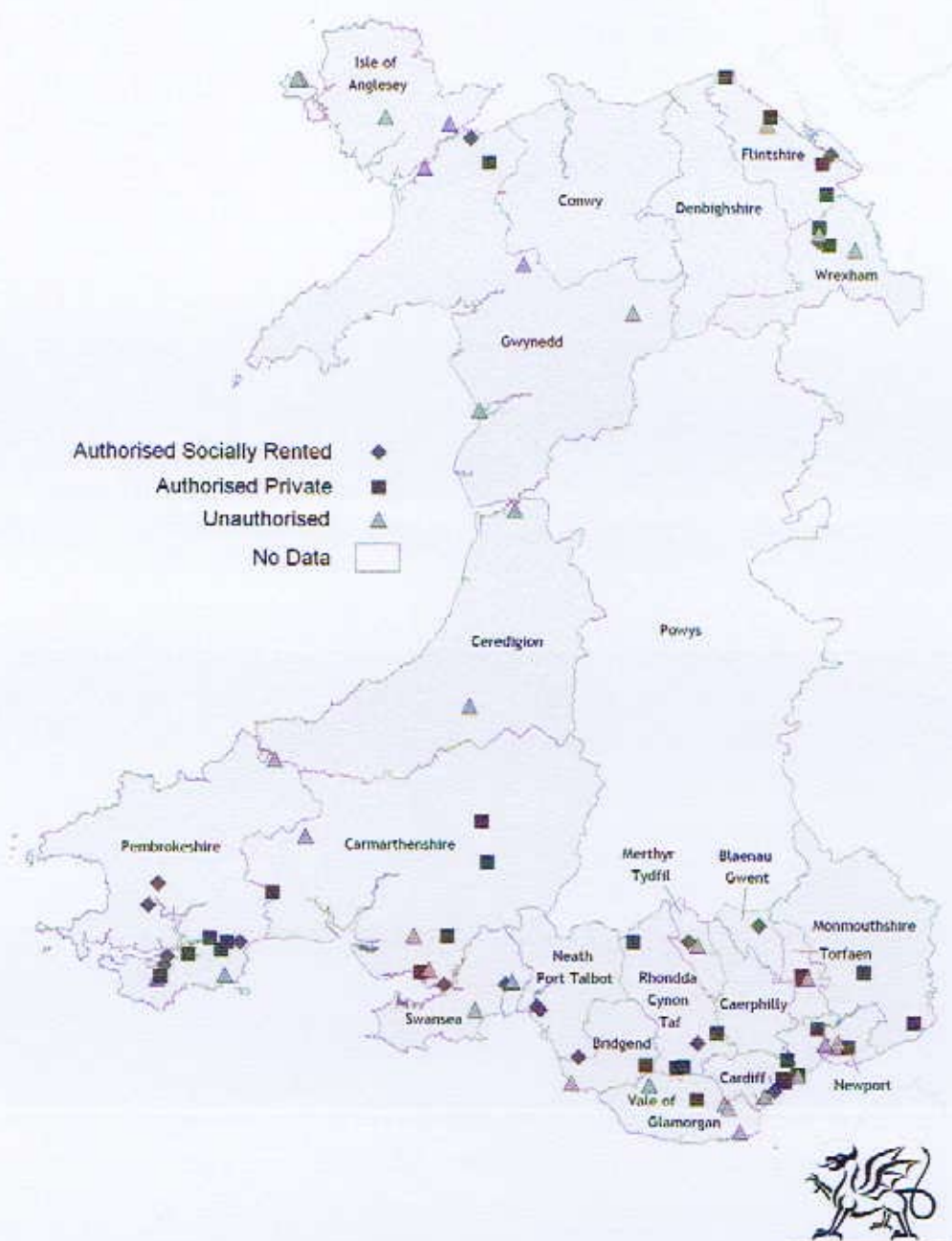
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Welsh Government, Cathays Park, Cardiff, CF10 3NQ

Telephone – Press Office **029 2089 8099**, Public Enquiries **029 2082 5050****[www.wales.gov.uk/statistics](http://www.wales.gov.uk/statistics)**Llywodraeth Cymru  
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**Map 1: Gypsy Sites in Wales on 18th July 2013**



Source: Knowledge and Analytical Services

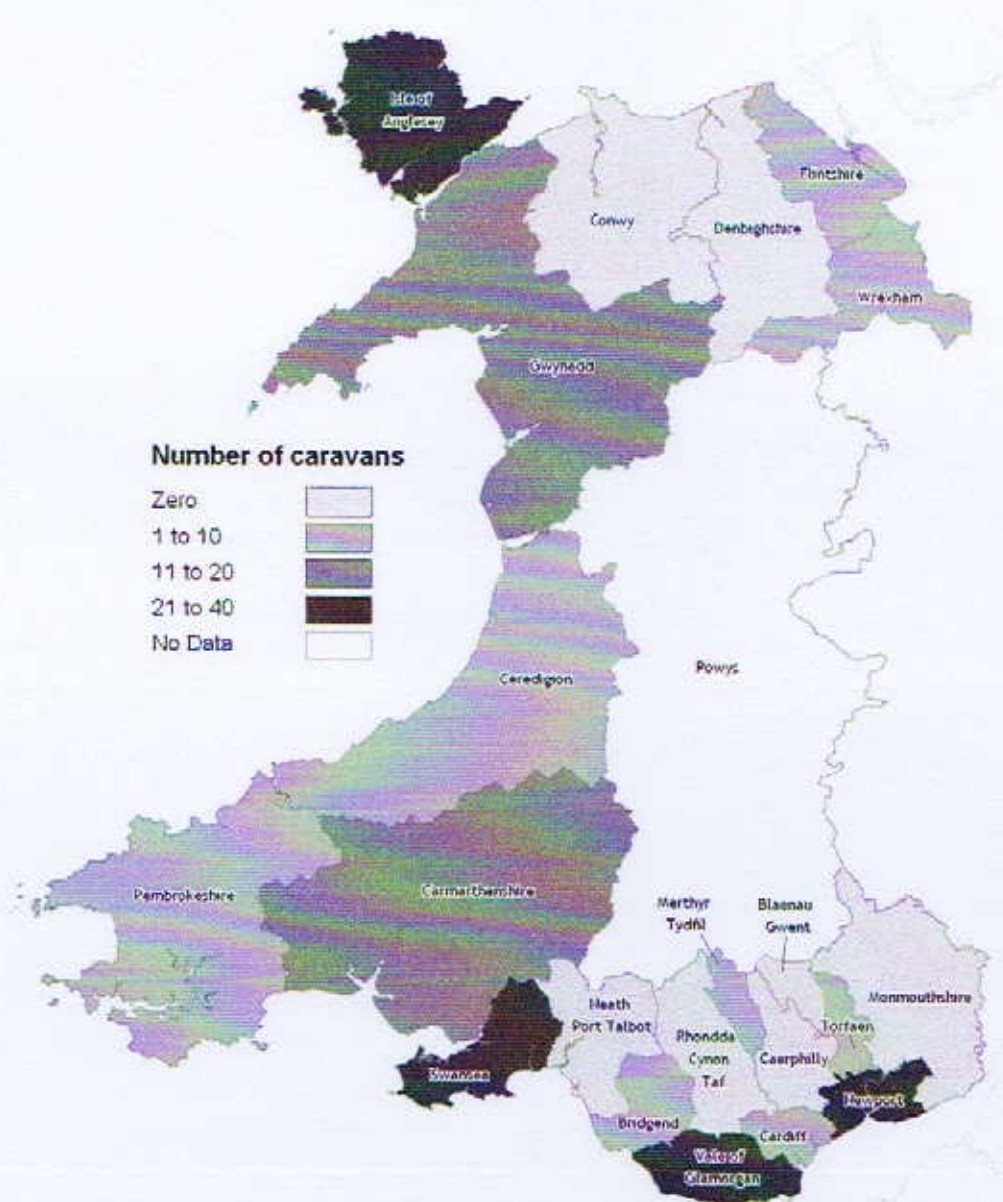
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**Map 2: Number of caravans on unauthorised sites  
on 18th July 2013**



**Source: Knowledge and Analytical Services**

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**Table 1. Count of Gypsy and Traveller caravans on 18 July 2013**

	Authorised sites (with planning permission)		Unauthorised sites (without planning permission)				All caravans
	Number of caravans		Number of caravans on sites on Gypsies own land		Number of caravans on sites on land not owned by Gypsies		
	Local Authority (a)	Private	Tolerated	Not tolerated	Tolerated	Not tolerated	
Isle of Anglesey	0	0	0	0	28	11	39
Gwynedd	7 (r)	3 (r)	0	0	0 (r)	12	22 (r)
Conwy	0	0	0	0	0	0	0
Denbighshire	0	0	0	0	0	0	0
Flintshire	26	47	0	0	0	2	75
Wrexham	24	5	0	2	0	4	35
Powys	..	..	..	..	..	..	..
Ceredigion	0	0	0	1	0	4	5
Pembrokeshire	130	12	0	1	3	0	146
Carmarthenshire	18	65	3	12	0	0	98
Swansea	15	0	0	0	15	12	42
Neath Port Talbot	78	0	0	0	0	0	78
Bridgend	0	4	0	0	0	4	8
Vale of Glamorgan	0	0	0	0	2	33	35
Cardiff	157	22	0	0	0	2	181
Rhondda Cynon Taf	7	23	0	0	0	0	30
Merthyr Tydfil	35	0	0	0	7	0	42
Caerphilly	0	0	0	0	0	0	0
Blaenau Gwent	22	0	0	0	0	0	22
Torfaen	38	16	7	0	0	0	61
Monmouthshire	0	4	0	0	0	0	4
Newport	0	20	0	12	21	6	59
Wales (b)	557 (r)	221 (r)	10	28	76 (r)	90	982 (r)

(a) Alternatively known as Socially Rented sites. Includes sites owned by Registered Social Landlords.

(r) Revised December 2013

.. Data item not available



**Table 2. Number of pitches on Gypsy and Traveller sites provided by local authorities in Wales on 18 July 2013**

	Number of pitches				Total number of all pitches
	Residential occupied	Residential vacant	Transit occupied	Transit vacant	
Isle of Anglesey	0	0	0	0	0
Gwynedd	7	0	0	0	7
Conwy	0	0	0	0	0
Denbighshire	0	0	0	0	0
Flintshire	20	0	0	0	20
Wrexham	12	3	0	0	15
Powys	..	..	..	..	..
Ceredigion	0	0	0	0	0
Pembrokeshire	70	1	0	0	71
Cardiganshire	18	0	0	0	18
Swansea	7	0	0	0	7
Neath Port Talbot	52	2	0	0	54
Bridgend	0	0	0	0	0
Vale of Glamorgan	0	0	0	0	0
Cardiff	79	1	0	0	80
Rhondda Cynon Taf	7	0	0	0	7
Merthyr Tydfil	22	2	0	0	24
Caerphilly	0	0	0	0	0
Blaenau Gwent	20	0	0	0	20
Torfaen	23	2	1	0	26
Monmouthshire	0	0	0	0	0
Newport	0	0	0	0	0
Wales (a)	337	11	1	0	349

(r) Revised December 2013

.. Data item not available



**Table 3. Number of caravans on authorised and unauthorised sites reported in bi-annual Gypsy and Traveller Caravan Counts**

	January 2012		July 2012		January 2013		July 2013	
	Authorised Sites	Unauthorised Sites	Authorised Sites	Unauthorised Sites	Authorised Sites	Unauthorised Sites	Authorised Sites	Unauthorised Sites
Isle of Anglesey	0	10	0	33	0	11	0	39
Gwynedd (a)	..	..	9	12	13 (r)	0 (r)	10 (r)	12 (r)
Conwy	0	0	0	0	0	0	0	0
Denbighshire	0	0	0	0	0	0	0	0
Flintshire	60	6	58	7	65	13	73	2
Wrexham	27	10	24	3	29	2	29	6
Powys (a)	27	2	29	38	32	10	..	..
Ceredigion	0	4	0	0	0	0	0	5
Pembrokeshire	108	6	123	4	143	2	142	4
Cardigan	84	5	81	5	78	15	83	15
Swansea	18	11	10	12	18	11	15	27
Neath Port Talbot	80	0	76	0	81	0	78	0
Bridgend	4	0	4	0	4	0	4	4
Vale of Glamorgan	0	8	0	9	0	18	0	35
Cardiff	142	5	154	13	181	1	179	2
Rhondda Cynon Taf	21 (r)	2 (r)	21	0	21	0	30	0
Merthyr Tydfil	24	6	25	6	31	5	35	7
Caerphilly	0	0	0	0	0	0	0	0
Blaenau Gwent	19	0	19	0	18	0	22	0
Torfaen	53	7	53	6	54	6	54	7
Monmouthshire	3	0	3	0	4	0	4	0
Newport	21	24	21	37	24	24	20	39
Wales (b)	691 (r)	106 (r)	710	185	796 (r)	118 (r)	778 (r)	204 (r)

(a) Authority did not take part in all 4 of the most recent counts

(b) Wales figures only refer to the local authorities that responded in each count

.. Data item not available

(r) Revised December 2013



**Table 4. Number of authorised and unauthorised sites reported in bi-annual Gypsy and Traveller Caravan Counts**

	January 2012		July 2012		January 2013		Number of sites July 2013	
	Authorised Sites	Unauthorised Sites	Authorised Sites	Unauthorised Sites	Authorised Sites	Unauthorised Sites	Authorised Sites	Unauthorised Sites
Isle of Anglesey	0	2	0	6	0	1	0	4
Gwynedd (a)	..	..	2	4	2 (r)	3 (r)	2 (r)	4 (r)
Conwy	0	0	0	0	0	0	0	0
Denbighshire	0	0	0	0	0	0	0	0
Flintshire	4	2	4	2	4	2	5	1
Wrexham	3	2	3	2	3	1	3	2
Powys (a)	4	1	4	3	4	3	..	..
Ceredigion	0	2	0	0	0	0	0	3
Pembrokeshire	9	3	9	2	9	2	10	2
Carmarthenshire	6	2	6	2	6	3	6	3
Swansea	1	1	1	2	1	2	1	3
Neath Port Talbot	3	0	2	0	3	0	3	0
Bridgend	1	0	1	0	1	0	1	1
Vale of Glamorgan	0	2	0	2	1	3	1	4
Cardiff	3	1	5	4	6	1	6	1
Rhondda Cynon Taf	4 (r)	1 (r)	4	0	4	0	5	0
Merthyr Tydfil	1	1	1	1	1	1	1	1
Caerphilly	0	0	0	0	0	0	0	0
Blaenau Gwent	1	0	1	0	1	0	1	0
Torfaen	3	1	3	1	3	1	3	1
Monmouthshire	2	0	2	0	2	0	2	0
Newport	5	5	6	6	6	4	5	5
Wales (b)	50 (r)	28 (r)	54	37	57 (r)	27 (r)	55 (r)	35 (r)

(a) Authority did not take part in all 4 of the most recent counts

(b) Wales figures only refer to the local authorities that responded in each count

.. Data item not available

(r) Revised December 2013