



Dear Colleague,

## **Re: Inquiry into the provision of sites for Gypsy, Roma, and Travellers**

Cardiff Council welcomes the opportunity to provide evidence to the Local Government and Housing Committee inquiry into the provision of sites for Gypsy, Roma and Travellers. The response to the questions posed by the committee address the key issues for Cardiff and the accommodation provided to the Gypsy Roma and Traveller community.

### **Consultation Response**

#### ***1. Are Welsh local authorities and Gypsies, Roma and Travellers communities managing to work together successfully to:***

##### ***a) identify sustainable residential and transit sites,***

Prior to Covid-19 Cardiff Council was collaborating with other regions around the prospect of a transit site along the M4 corridor. Discussions halted because of the Covid-19 pandemic. We are hoping to restart these discussions as Cardiff Council believes that a regional approach and strategy for the provision of transit sites is necessary.

##### ***b) discuss Gypsies, Roma, and Travellers' accommodation needs?***

Cardiff Council believes the accommodation needs of the Gypsy, Roma and Traveller communities have been captured via the Gypsy and Traveller Accommodation Assessment (GTAA). To complete the GTAA Cardiff Council set up a steering group with membership from agencies that work with and support the Gypsy, Roma and Traveller community. The steering group ensured that the GTAA was publicised to as many individuals as possible. Consultation with the community took place as part of the preparation of the GTAA.

Following the submission of the latest GTAA, Cardiff carried out a further review of the services provided to the Gypsy, Roma and Traveller community on local authority sites. This raised several challenges such as overcrowding, healthcare inequalities and the need for tenancy support. Considering the information received from the Gypsy, Roma and Traveller community we are now reviewing our service to ensure it meets the needs of the community.

#### ***2. Gypsy and Traveller Accommodation Assessments (GTAAs) re intended to assess the accommodation needs of the Gypsy, Roma and Traveller community. In your view are Welsh local authorities, as a whole, implementing monitoring and reviewing GTAA's effectively?***

Cardiff Council takes its statutory obligations to meet the accommodation needs of the Gypsy, Roma and Traveller Community seriously and are currently reviewing the

findings from the most recent GTAA and activity seeking to meet the needs identified.

Progress in developing additional accommodation has been impacted by the challenge of finding suitable sites, acquiring the land and gaining planning permission.

The GTAA forms an important part of the evidence base to inform the preparation of the Local Development Plan (LDP). The findings of the most recent GTAA will inform the preparation of the new Replacement LDP the Council commenced preparation on in March 2021. This plan will need to identify suitable sites for additional accommodation to meet the needs identified in the GTAA. Due to the challenge of finding suitable sites in the city this will be a key issue for the plan to consider and it will be important to work closely with partners within the region and Welsh Government in meeting this requirement.

There is a large Gypsy, Roma and Traveller community in Cardiff, with significant existing accommodation provision. As a result Cardiff is seeing a larger impact on services compared with other local authorities who have little to no accommodation provision for the Gypsy, Roma, Traveller community.

### ***3. Does the current statutory and policy framework ensure sufficient culturally appropriate Gypsy, Roma and Traveller residential and transit sites across Wales and within individual local authorities?***

Cardiff Council understands its statutory duties to provide accommodation which is appropriate to the needs of the Gypsy, Roma, and Traveller Community.

The policy framework does not assist with providing for the accommodation needs of the Gypsy, Roma, and Traveller Community. This stems from this type of accommodation not being viewed as “housing” in the same way as other forms of accommodation, therefore social housing grant does not apply and although grant funding is available this does not cover the cost of land. In addition there are significant costs in terms of planning, environmental /flooding searches which need to be met before a grant bid can be submitted and if it is not possible to take the scheme ahead these abortive costs fall to the Council. Access for funding to provide further accommodation for the Gypsy, Roma, and Traveller community should be in line with funding for other types of social housing.

This type of accommodation should also be held within the Housing Revenue Account if the local authority chooses to do so. Holding this accommodation within the general fund has no sound rationale, and prevents the flexible and shared use of resources and capital funding that holding the accommodation within the HRA would allow.

Preventing the use of social housing grant for Gypsy, Roma, and Traveller accommodation could be perceived as discriminatory.

#### **4. What are the key challenge for Welsh local authorities and the Welsh Government in providing suitable and sufficient accommodation sites for Gypsy, Roma and Traveller communities?**

Cardiff Council have identified the following key challenges:

- Acceptance of Gypsy, Roma, and Traveller accommodation whether permanent or transient as a form of social housing.
- There is a need to address the discriminatory behaviours and prejudice towards the Gypsy, Roma and Traveller community rather than solely focussing on ensuring the community are conducting themselves appropriately. The community can be subject to local hostility, negative media coverage and violence.
- The identification of suitable land for development. This can be due to ecological concerns and flood risks. While the community consider privacy of location to be important, such prospective sites can cause barriers due to a lack of transport and isolation from mainstream services. Cardiff has very few sites that would be suitable for such development and therefore all suitable land should be made available for this purpose, including Welsh Government owned land where appropriate.
- Cost implications due to a lack of funding for this type of housing as social housing grant is not available (see above).
- Planning legislation has improved the amount of social housing by placing an obligation on property developers to include a proportion of social or affordable homes in any new schemes. There is no parallel legislation to ensure the provision of Gypsy, Roma and Traveller accommodation.

#### **5. Do you anticipate when/if the UK Government's Police, Crime, Sentencing and Court Bill comes into force there will be:**

##### **a) specific challenges to overcome, and/or**

Cardiff Council do not believe the police or justice system will solve the concern around the Gypsy, Roma and Traveller community having a lack of permanent and transit accommodation options. We need to explore resolutions that solve homelessness within the community by creating sites for people to occupy.

The bill seeks to criminalise the Gypsy, Roma and Traveller Community for following their cultural way of life. Prison sentences for unauthorised encampments with the removal of individuals homes would see an increase in children's services placing Gypsy, Roma, & Traveller children into care.

The sale of vehicles and trailers to pay fines may be seen as disproportionate, given that unauthorised encampments stem from a lack of suitable temporary and permanent accommodation options. This would have a huge impact on individuals being able to earn money to provide for their families.

##### **b) in certain locations in Wales, related to Gypsy, Roma, and Traveller sites?**

The majority of unauthorised encampments in Cardiff are found in the east of the city due to easy access to transport links.

**6. Do you have any additional comments or observations about the provision of accommodation sites in Wales for Gypsy, Roma, and Traveller communities.**

There is a strong commitment to develop the provision of accommodation sites in Cardiff, but the challenges are significant and cannot be achieved in isolation, to address the lack of both permanent and transient sites a regional approach is needed, use of all available land should be considered and Welsh Government will be required to take a more active lead.

We hope this information fully answers your questions, however, should you require any further clarification, please contact the Housing Strategy team mailbox at [HousingStrategy@cardiff.gov.uk](mailto:HousingStrategy@cardiff.gov.uk).

Yours sincerely

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