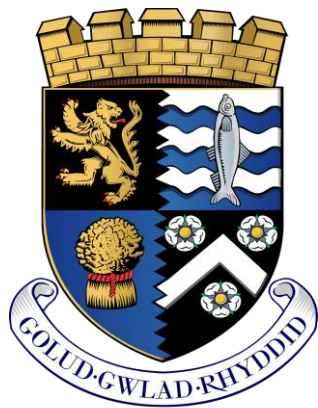


January 2022



Cyngor Sir  
**CEREDIGION**  
County Council

# GYPSY AND TRAVELLER ACCOMMODATION ASSESSMENT

2022

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## 1. Summary

This report presents the results of the 2019 Gypsy and Traveller Accommodation Assessment (GTAA) undertaken by Ceredigion County Council (CCC) and relevant updates to January 2022. With the aim of establishing the need for transit, temporary or permanent pitch provision over the next five years and over the fifteen-year period of the replacement local development plan (LDP) 2018-2033.

The covid pandemic in 2020 has hampered the Local Authority's ability to engage with the GT community however where it has been possible since the easing of restrictions engagement is noted in the appendices.

Currently there are no local authority Gypsy Traveller sites and only one authorised private site in the county, nor is there any permanent provision for Showmen. Historically, it has been challenging to contact New Travellers as the Council holds no records of their location. Since June 2016, ethnicity has been included in the housing register application process which identified four members of the Gypsy Traveller community, three of whom are not currently living in Ceredigion and one who lives in bricks and mortar accommodation. There are two further members of the Gypsy Traveller community who have been housed in bricks and mortar accommodation for a number of years prior to the ability to identify ethnicity through the housing register application process.

As expected, it has proved extremely difficult to locate the target population for this assessment. Data from the 2011 Census and relevant information gathered from Council departments including Education, Schools, Planning and Housing, other public bodies and third sector organisations were pooled to try to create the best possible sample frame, but only 5 potential households were identified and unfortunately 4 of these were unwilling to take part in the survey. The Showmen's Guild of Great Britain were contacted but no responses were received from them.

One individual did respond stating that they weren't satisfied with their current accommodation. However, prior to finalising the assessment, the individual moved out of County.

From the very small number of questionnaires returned and interviews/site visits carried out, particularly those following the Covid 19 pandemic it would appear that there is no need for a permanent or transit site within the County.

## 2. Introduction

Gypsies and Travellers are one of the most disadvantaged groups in Welsh society, suffering from social exclusion and racism, educational disadvantage and shorter life expectancy than the settled community. The health impact of their living conditions is explored in a report by the Traveller Movement, commissioned by the National Inclusion Health Board, which was published on 8 January 2016<sup>1</sup>. The report found that:

- two-thirds of Gypsies and Travellers reported poor, bad, or very bad health
- the living conditions of Gypsies and Travellers significantly contribute to their physical and mental health
- the poor health of Gypsies and Travellers is made worse by their living environment, accommodation insecurity and community discrimination
- A closer partnership working across health and other interests to address these issues is needed.

Welsh Government is trying to improve the relationship between Gypsies and Travellers and the settled community and promote better understanding between communities. Rather than

“ living in agitation at the presence of the other, [the settled and Gypsy Traveller (GT) community] can live as cohesive communities, accepting differences, but not allowing these differences to define the nature of interaction between groups.”<sup>2</sup>

The Gypsy Traveller Accommodation Assessment (GTAA) is an integral part of this vision.

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<sup>1</sup> 'Impact of insecure accommodation and the living environment on Gypsies' and Travellers' health' available at <https://www.gov.uk/government/publications/gypsy-and-traveller-health-accommodation-and-living-environment>

<sup>2</sup> 'Travelling to a better future', available at <http://www.romaniarts.co.uk/wp-content/uploads/2012/06/110928gypsytravelleren.pdf>

### 3. Regulatory framework

#### Legislation and guidance

The Welsh Government's (WGs) 'Enabling Gypsies, Roma and Travellers (June 2018) replaces 'Travelling to a Better Future: a Gypsy and Traveller Framework for Action and Delivery Plan' (2014) and sets Wales' vision for the inclusion of these communities in Welsh society. The Framework seeks to ensure the needs of Gypsies and Travellers are assessed, planned for and implemented more strategically and their access to services improved. It includes a commitment from the Welsh Government to work with Local Authorities to seek to facilitate the Gypsy Traveller way of life and therefore improve access to services for Gypsy and Traveller households, and where a need is identified, to deliver new Gypsy and Traveller sites which sits alongside the WG's Sites Capital Grant programme.

The assessment of Gypsy and Traveller accommodation needs, and the duty to make provision for sites where the assessment identifies need, became statutory requirements under Section 101 of the Housing (Wales) Act 2014. The Gypsy Traveller Accommodation Assessment (GTAA) must be carried out at least every five years and in this context Welsh Government published 'Undertaking Gypsy and Traveller Accommodation Assessments Guidance'<sup>3</sup> to assist Local Authorities in producing a robust assessment of Gypsy and Traveller accommodation needs in their area.

The Housing (Wales) Act 2014 consolidated the definition of 'Gypsies and Travellers' with the Mobile Homes (Wales) Act 2013 as:

- (a) Persons of a nomadic habit of life, whatever their race or origin, including:
  - (i) Persons who, on grounds only of their own or their family's or dependant's educational or health needs or old age, have ceased to travel temporarily or permanently, and
  - (ii) Members of an organised group of travelling show people or circus people (whether or not travelling together as such); and
- (b) All other persons with a cultural tradition of nomadism or of living in a mobile home<sup>4</sup>.

This means that all such individuals should be considered as having 'Gypsy Status' in planning terms. There is a full summary of definitions in Table in [Annex 1](#).

Section 56 of the Mobile Homes (Wales) Act 2013 provides additional safeguards for those living on and running Local Authority Gypsy and Traveller sites as well as an outline of the mechanisms through which a Local Authority can comply with the new

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<sup>3</sup> Available at <https://gov.wales/sites/default/files/publications/2019-03/undertaking-gypsy-and-traveller-accommodation-assessments.pdf>

<sup>4</sup> "mobile home" ("*cartref symudol*") has the meaning given by section 60 of the Mobile Homes (Wales) Act 2013.

requirement under the Housing (Wales) Act 2014 to meet any identified need. These mechanisms are summarised below.

- 1) Providing Local Authority Gypsy and Traveller sites.
- 2) Supporting households to develop viable private sites
- 3) Supporting households to develop viable community-led approaches such as Community Land Trusts.

The option of providing a Local Authority Gypsy and Traveller site offers the Council opportunities to control the allocation of pitches, in accordance with the Mobile Homes (Wales) Act 2013 and housing allocation policies. Welsh Government also provide a Sites Capital Grant which will be available to local authorities for the purpose of creating and developing sites of up to £1.5million per site.

When committing to the duty to make provisions for any identified accommodation need, the Local Authority must also follow the advice set out in Planning Circular WGC 016/2014 'The Use of Planning Conditions for Development Management' in respect of the Gypsy and Traveller community and Welsh Government Circular 005/2018: Planning for Gypsy, Traveller and Showpeople Sites which has replaced Circular 30/2007 'Planning for Gypsy and Traveller caravan sites', Welsh Office Circulars 78/91 'Travelling Show People' and 2/94 'Gypsy Sites and Planning'.

Welsh Government's 'Designing Gypsy and Traveller Sites' guidance provides the practical advice required to assist Local Authorities to ensure their sites are fit-for-purpose. The guidance is designed to assist Local Authorities and others in the development and improvement of Gypsy and Traveller sites in their area, and compliance with it will form part of Welsh Government's assessment of applications for Sites Capital Grant funding in relation to Gypsy and Traveller sites.

The requirements for assessing accommodation needs and identifying Gypsy Sites set out above are echoed in Para 4.2.35 of Planning Policy Wales (Edition 10, December 2018) which states: *'Local authorities are required to assess the accommodation needs of Gypsy and Traveller families and to allocate sites to meet the identified need. Where a Gypsy and Traveller Accommodation Assessment (GTAA) identifies an unmet need, a planning authority should allocate sufficient sites in their development plan to ensure that the identified pitch requirements for residential and/or transit use can be met. Planning authorities will need to demonstrate that sites are suitable for development and deliverable in the identified timescales.'*

Welsh Government issued guidance in May 2020 in relation to moving Gypsy and Travellers from unauthorised sites during the Covid 19 Pandemic which the Local Authority took into consideration. The guidance outlined the increased difficulties the Gypsy and Traveller community could face as a result of the pandemic which led to changes to the usual guidance that was in place. The Local Authority were notified that they should not evict unauthorised encampments unless there was a significant risk to the public arising from their continued occupation. If eviction was the only option it was the Local Authority's duty to find an alternative location for the Gypsy and Travellers. The welfare of the Gypsy and Traveller community was a priority too as the guidance referred to increased toilets and shower blocks being provided as

well as ensuring welfare checks were carried out within 24 hours of being notified of the encampment. The space between trailers was also an important aspect to consider during the pandemic, the guidance refers to needing a gap of 6 meters to ensure that residents could isolate.

### Local Development Plan

The Ceredigion Local Development Plan 2007-2022 (LDP) was adopted in April 2013. LDP Policy LU04: 'Meeting a Range of Housing Needs' sets out the criteria to be used to determine planning applications for new Gypsy Traveller sites or extensions to existing sites. The policy recognises the need:

“to permit new gypsy and traveller sites and the accommodation of Gypsy and Traveller caravans where there is evidence of the need for permanent or temporary stay sites, subject to the availability of access and utilities infrastructure, located so as to afford access to education and health services and to ensure the safety of occupants, and constructed in accordance with the standards set out for Gypsy and Traveller sites”  
(Ceredigion County Council, 2013, Volume 1, p77)

Because the Gypsy Traveller needs assessments conducted in 2011 and 2015/16 found no evidence of need for a public site in Ceredigion, nor of sufficient populations travelling through Ceredigion to justify the development of a permanent transit site, there are currently no site specific allocations in the LDP. The LDP therefore applies criteria through policy to proposals for Gypsy and Traveller sites.

In terms of the LDP, the channels through which accommodation assessments should inform the planning process are outlined in Figure 1 below.

Diagram 1 - Planning for Gypsy, Traveller and Showpeople Caravan Sites

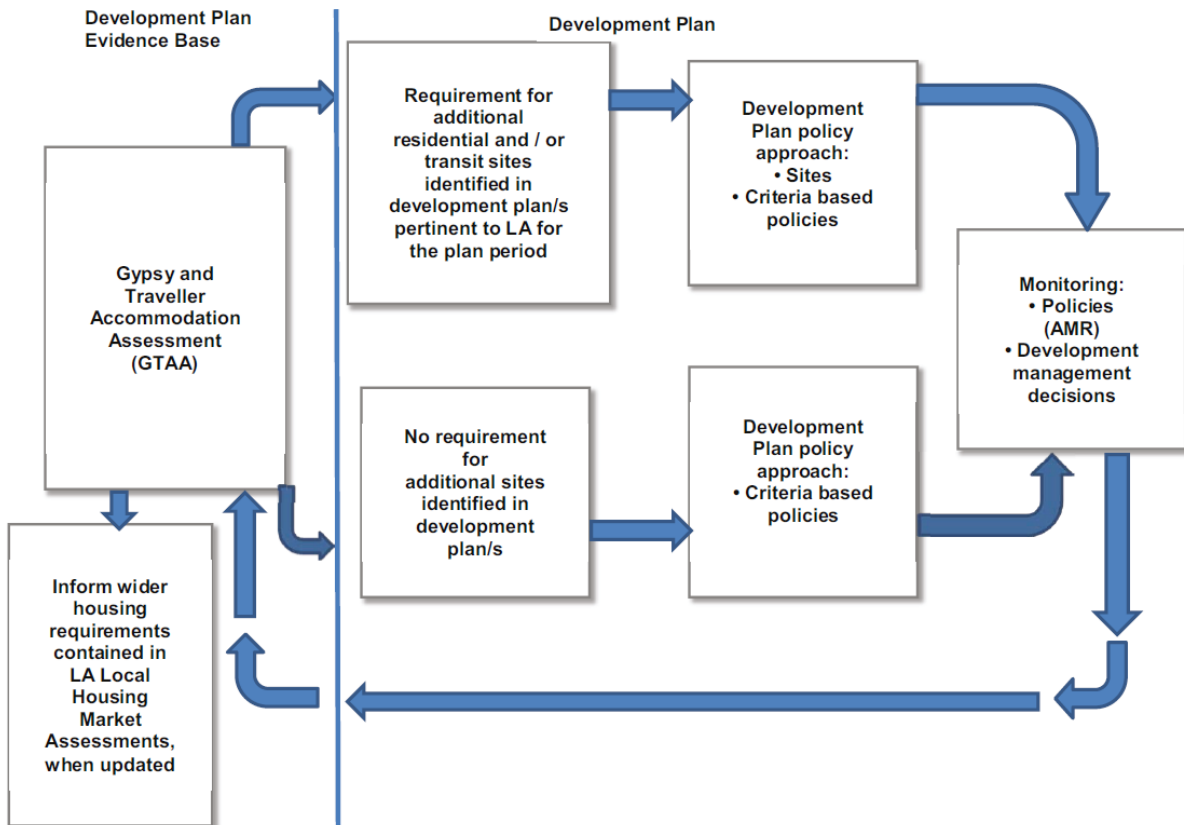


Figure 1: Planning for Gypsy Traveller and Showpeople Sites (2018 WG Circular)

This assessment will inform the preparation of a replacement Ceredigion LDP for the period 2018-2033. Planning Policy Wales (Edition 11, February 2021) para 4.2.35 states that; ‘...In drawing up policies planning authorities should consult providers of social housing, representatives of Gypsies and Travellers communities and landowners in areas likely to be appropriate for site provision. The consultation should be undertaken in a manner that is consistent with the planning authority’s Community Involvement Scheme.’

This assessment has not identified a potential need for a Gypsy Traveller site.

Should a need arise during the plan period, proposals will be considered for compliance with Policy LU04. The authority has reviewed LDP policy LU04 and considers it still fit for purpose.

**Policy LU04:**

*Meeting a Range of Housing Needs*

*The LDP provides for a range of housing needs based on an overall assessment of those needs by:*

*1. Permitting new gypsy and traveller sites and the accommodation of gypsy and traveller caravans:*

*i. where there is evidence of the need for permanent or temporary stay sites;*



- ii. subject to the availability of access and utilities infrastructure;*
- iii. located so as to afford access to education and health services and to ensure the safety of occupants; and*
- iv. constructed in accordance with the standards set out for Gypsy and Traveller sites.*

The replacement plan 2018-2033 is currently on hold in Ceredigion due in part to the impact of the Covid 19 pandemic and more recently to the interim planning guidance issued by NRW in relation to phosphates on the river Teifi SAC<sup>5</sup>. Effectively this guidance places an embargo on future developments across the affected area of the county 44.6% of the land of Ceredigion and on any developments, which could increase waste water, including but not limited to GT sites. At present the LDP team are focussing on developing a Nutrient Management Board and seeking solutions and mitigations for Phosphates and other nutrients county wide.

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<sup>5</sup> [Natural Resources Wales / Advice to planning authorities for planning applications affecting phosphorus sensitive river Special Areas of Conservation](#)

#### 4. The current situation

The current accommodation provision in Ceredigion is as follows:

- There are no local authority sites for Gypsies, Travellers or Showmen in the county.
- There is one consented privately-owned site with space for five caravans, all of which will provide for the emerging additional needs within the family for the period through to 2033.
- There are three known Gypsy Traveller households whose accommodation needs are currently being met by bricks and mortar accommodation.
- There is one unauthorised site which when periodically visited had two static caravans and two touring caravans, but according to the caravan count has been occupied by a maximum of up to 13 caravans in prior monitoring years. The influx in caravans is mainly during the period March-October.
- There are occasional unauthorised encampments as groups of Travellers pass through Ceredigion though this is sporadic in nature and has been very limited due to the Covid 19 pandemic over the last two monitoring years.

## 5. Study Methodology

Given the lack of identified need in previous assessments, establishing contact with households who might agree to be interviewed in the 2019 GTAA was challenging. A series of steering group meetings took place throughout 2019 and attendees included:

Corporate Manager Housing Services, Ceredigion County Council  
Housing Strategy and Monitoring Officer, Ceredigion County Council  
Ceredigion County Council Councillors/Cabinet members for the following portfolios:

- Highways and Environmental Services together with Housing
- Economy and Regeneration (which includes Planning)
- Finance and Procurement Services and Public Protection Services

Engagement and Equalities Officer, Ceredigion County Council  
Development Management Assistant (Compliance), Ceredigion County Council  
Development Management Team Leader (Compliance), Ceredigion County Council

Environmental Health Officer responsible for the caravan count, Ceredigion County Council

Performance and Research Manager, Ceredigion County Council

Research Officer, Ceredigion County Council

Research Assistant, Ceredigion County Council

Planning Policy Officer, Ceredigion County Council

Planning Policy Manager, Ceredigion County Council

Corporate Manager Planning Services, Ceredigion County Council

Service Manager (Development Management), Ceredigion County Council

Solicitor, Ceredigion County Council

Regional Community Cohesion Co-ordinator

A representative from Hywel Dda Health Board

A representative from Travelling Ahead

A representative from the GT Community from Pembrokeshire

A representative from the Dyfed Powys Police Force

Unfortunately, no members of the local Gypsy Traveller community within Ceredigion were willing to take part in the steering group meetings. A representative from the GT Community in Pembrokeshire attended the meetings to provide insight but unfortunately wasn't aware of a contact within Ceredigion that we could approach to attend.

All parties that were involved with the engagement process of the GTAA were understanding of the Housing Acts Definition of the GT community. They were all included in the GT steering group and were involved in the preparation of the assessment, particularly around utilising planning information.

Ceredigion County Council committed to updating the study in-house, on the basis of the skills & expertise of staff having undertaken previous assessments and the existing GTAA steering group and regular dialogue across relevant stakeholders in Ceredigion. Regular contact with the neighbouring authorities was maintained,

particularly Carmarthenshire and Pembrokeshire. The Regional Community Cohesion Co-ordinator attended the steering group for Ceredigion and was able to provide an overview for Mid and West Wales.

### Data sources

A desk top study was carried out to assess all secondary sources of data which might help in identifying potential contacts and, as further possibilities emerged, the scope of the study was extended.

### 2011 Census

Although it provides no information on New Travellers or Show People, in 2011 for the first time the ethnic group choices in the Census included the category 'White: Gypsy or Irish Traveller' and this provided the starting point for assessing the potential size of the target population in the county. In total, 74 individuals usually resident in Ceredigion identified themselves as Gypsies or Irish Travellers and Table 1 and Figure 2 below show the breakdown of this population by ward.

Since Ceredigion is a sparsely populated rural county, wards tend to cover relatively large areas and there is no obvious concentration of the target population in any one location. The largest number of individuals recorded in any ward in the county was 12, while 23 wards recorded five or fewer residents in this ethnic group and 14 of the 40 wards had none.

**Table 1: Number of individuals identifying as Gypsy or Irish Traveller by Ward**

2011 ward	All usual residents	White: Gypsy or Irish Traveller
W05000357 : Aberaeron	1,422	0
W05000358 : Aberporth	2,374	7
W05000359 : Aberteifi/Cardigan-Mwldan	1,784	0
W05000360 : Aberteifi/Cardigan-Rhyd-y-Fuwch	1,226	0
W05000361 : Aberteifi/Cardigan-Teifi	1,174	1
W05000362 : Aberystwyth Bronglais	2,075	1
W05000363 : Aberystwyth Canol/Central	2,471	4
W05000364 : Aberystwyth Gogledd/North	2,641	4
W05000365 : Aberystwyth Penparcau	3,122	0
W05000366 : Aberystwyth Rheidol	2,731	1
W05000367 : Beulah	1,627	0
W05000368 : Borth	2,078	0
W05000369 : Capel Dewi	1,293	0
W05000370 : Ceulanamaesmawr	1,910	1
W05000371 : Ciliau Aeron	1,974	1
W05000372 : Faenor	2,545	1
W05000373 : Lampeter	2,970	12
W05000374 : Llanarth	1,616	1
W05000375 : Llanbadarn Fawr-Padarn	1,042	1
W05000376 : Llanbadarn Fawr-Sulien	2,338	1
W05000377 : Llandyfriog	1,835	1

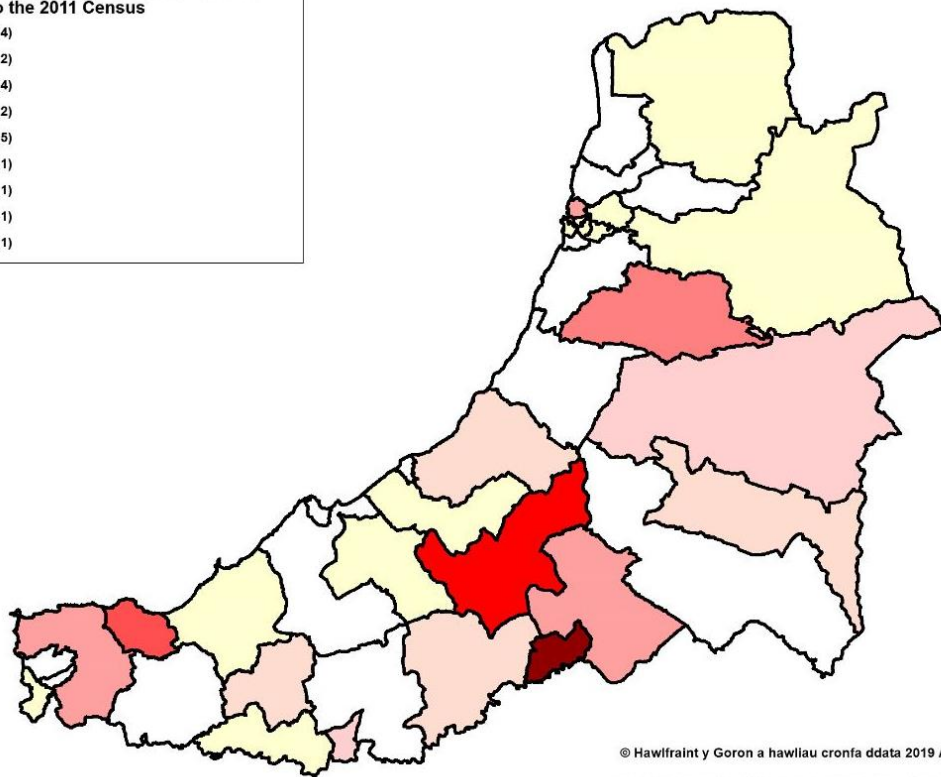
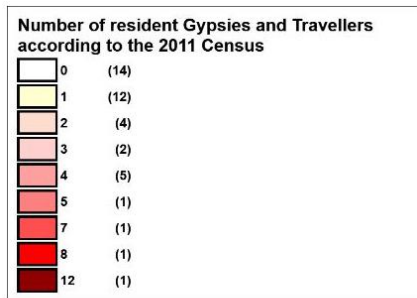
2011 ward	All usual residents	White: Gypsy or Irish Traveller
W05000378 : Llandysilio-gogo	1,979	0
W05000379 : Llandysul Town	1,439	3
W05000380 : Llanfarian	1,541	0
W05000381 : Llanfihangel Ystrad	2,037	8
W05000382 : Llangeitho	1,459	0
W05000383 : Llanybi	1,484	4
W05000384 : Llanrhystyd	1,562	0
W05000385 : Llansantffraed	2,386	2
W05000386 : Llanwenog	1,854	2
W05000387 : Lledrod	2,209	3
W05000388 : Melindwr	2,020	1
W05000389 : New Quay	1,082	0
W05000391 : Pen-parc	2,308	4
W05000390 : Penbryn	2,045	1
W05000392 : Tiryrynach	1,901	0
W05000393 : Trefeurig	1,771	0
W05000394 : Tregaron	1,213	2
W05000395 : Troedraur	1,310	2
W05000396 : Ystwyth	2,074	5

NB: In order to protect against disclosure of personal information, records have been swapped between different geographic areas. Some counts will be affected, particularly small counts at the lowest geographies.

Source: ONS 2011 Census

These 74 individuals are recorded in 29 households, of which 21 were living in houses or bungalows, 5 in flats, maisonettes or apartments and only three in caravans or other mobile or temporary structures. However, it is widely recognised for a variety of reasons that the Census figures underestimate the total population.

It is important to note that most of the Gypsy and Irish Traveller population were not living in caravans. In the county as a whole the 2011 Census records 389 households living in a caravan or other mobile home. Although it may be tempting to equate living in a caravan with having a nomadic way of life or a cultural tradition of nomadism, the evidence from the Census does not bear this out. In Ceredigion it is quite commonplace to live in a caravan on site whilst building a home and there are also a number of caravan sites where there are permanent residents who do not declare themselves to be members of the Gypsy and Irish Traveller population.



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Source: ONS 2011 Census

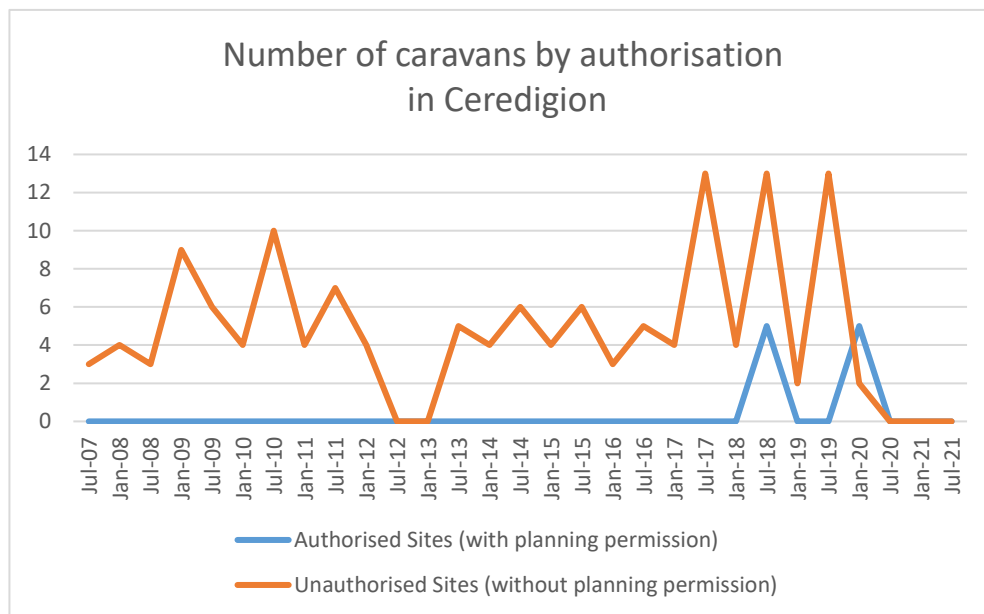
Figure 2: Distribution of Gypsy or Irish Travellers by Ward from 2011 Census

### The Bi-annual Caravan Count

The bi-annual caravan count is conducted by all local authorities in Wales on a specific date in January and July of each year. The most recent return for July 2021 indicated no caravans on authorised sites or on unauthorised site. Since July 2007 a maximum of 10 unauthorised sites have been identified in any one count, which provides some indication of trends in transit need. Since 1991 no more than thirteen caravans have been recorded in any one year and in several years there were none at all.

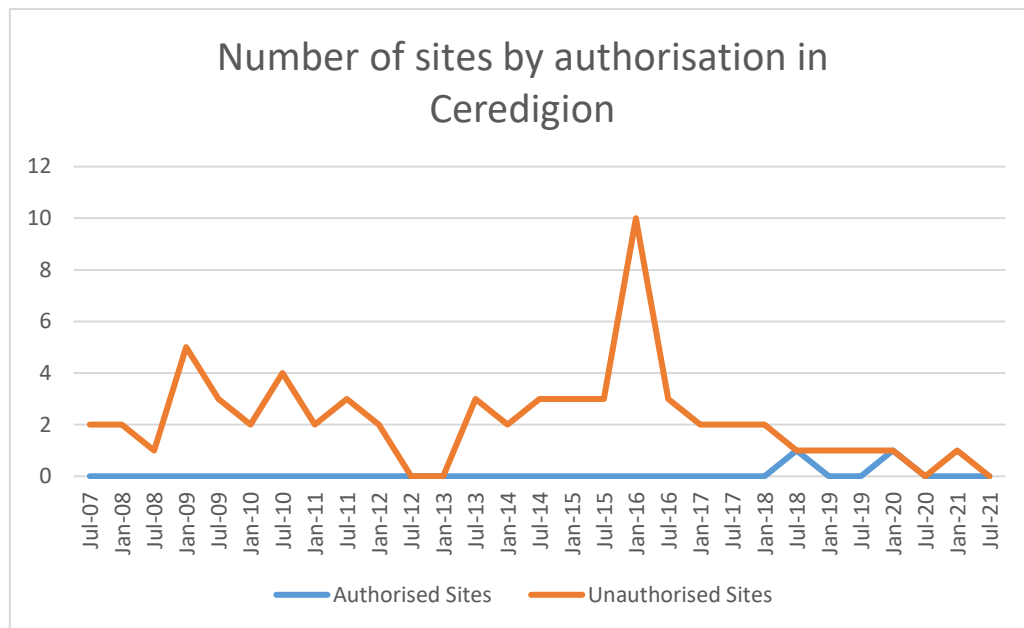
The following graph shows the number of caravans on both authorised and unauthorised sites in Ceredigion between July 2007 and July 2021. It is clear from the graph that there are no authorised sites in Ceredigion except for the one which has planning permission for 5 pitches, which was counted during the July caravan count in 2018. It's evident that there was an increase in the number of caravans on unauthorised sites between 2016 and 2017 as the number of caravans during the summer increased from 5 to 13 and has remained consistent at 13 during the following two summers. The number of caravans on unauthorised sites in Ceredigion

has previously been a similar figure back in July 2009 and July 2010 with 9 and 10 caravans counted respectively. Although, since January 2020 there was a sudden decrease in the number of caravans on unauthorised sites, it decreased to 2 and then was 0 for the following 3 counts. The difference between the number of caravans counted on unauthorised sites during the count in January and July highlights their seasonality in travelling patterns to Ceredigion during the summer as the numbers tend to peak in July when the Royal Welsh show is held in Builth Wells. Although, the relatively low numbers of caravans counted on unauthorised sites since 2007 highlights the fact that the number of members from the Gypsy Traveller community in Ceredigion is low and this corresponds with the lack of responses we have received to our attempts at engagement.



Source: Welsh Government Caravan Count (2007 – 2021)

This graph shows the number of authorised and unauthorised Gypsy and Traveller sites in Ceredigion between July 2007 and July 2021. The one authorised site which was recorded in the count during July 2018 corresponds with the 5 caravans parked in the pitches at the private site with planning permission. Whilst assessing the change in the number of unauthorised encampments, this graph highlights the fact that the 13 caravans on the unauthorised sites shown in the above graph are all located on one site due to the fact that only one unauthorised site was documented during the July 2018 and July 2019 count. The number of sites in Ceredigion has been consistently low since 2017 but has decreased further to only 0 site since July 2021.



Source: Welsh Government Caravan Count (2007 – 2021)

However, since the caravan count records only those encampments of which the authority is aware and is limited to two days per year, it cannot be considered to provide an accurate assessment of accommodation need nor of travelling patterns. Since it records caravans rather than households it cannot identify any cases of overcrowding. Nor does it normally require engagement with the occupants and therefore some encampments may not actually involve the Gypsy Traveller community at all.

### Live Caravan Count System

Since the last assessment in 2015 the online live caravan system has been developed and has provided better means of monitoring patterns of Gypsy and Traveller migrations as encampments are recorded in real time rather than at fixed points in the year. Monitoring the encampments also provides the Council with a more comprehensive picture of when, how and by whom transit routes are used (annex 5).

Whilst assessing the live caravan count numerous entries were recorded in Llangybi Common. These entries correspond with two individuals who lived in unauthorised encampments on the Common for many years. They moved into social housing in April 2016 and the entry was consequently closed on the system in 2017. Llangybi layby is also entered in the system, this layby was often occupied by one of the caravan owners who was recorded as staying on the common. They would occasionally travel up to Aberystwyth so would sometimes decide to camp in the layby rather than return to the common.

Corner Wood was entered as a record into the system numerous times. It was noted as an unauthorised encampment but after further investigation it was understood that the occupants do not claim Gypsy or Traveller status, therefore this encampment was discounted from the assessment. There is a long history of enforcement on the site which is still ongoing after a request for planning permission on the site was refused.



A group of travellers were recorded in Cardigan, Quay Street Car Park on the 15/06/2017 which had 8 caravans and 5 vans. They were waiting for another group to arrive from Anglesey and later moved onto Llandysul Business Park. The entry referring to Llandysul states that the number of caravans recorded were 16, it's therefore likely that the group mentioned above had been joined by the individuals from Anglesey when they moved to Llandysul. They were only on the site from the 13/07/2017 to 20/07/2017 and were only travelling through which highlights transit patterns rather than a need for an authorised site in Ceredigion.

There were three separate entries which highlight the fact that there may be a need of a transit site in Ceredigion rather than a permanent residential site.

- 11 caravans were recorded on Parc Teifi land on the 21/07/2017, although the record was closed on the 3rd August 2017 so it's likely that they were just passing through and are not in need of an authorised site. The industrial estate they were staying on is Welsh Government land.
- 11 caravans were recorded on Penweddig Playing fields on the 25th July 2018 but was vacated within a week following a court hearing on August 1st. The occupants of the caravans were likely to just be passing through as it was around the time of the Royal Welsh Show so could be heading to Builth Wells.
- It was noted that 6 caravans were recorded at Lampeter Rookery Car Park for 4 days on the 3rd September 2018. As the caravans were on site for such a short amount of time it would suggest that they were only passing through Lampeter as they travelled on to another location.

The only active unauthorised encampment on the live system is located in Plwmp. 13 caravans were counted on site in July 2018 but they had left by October 2018. Since 2018 it is only encampments on the Plwmp site which has been recorded on the live caravan count. 8 caravans were recorded on the site in 2019, the number then fell to 0 in 2020 until July 2021 – this could be due to the Covid-19 pandemic. By August 2021 6 caravans were recorded on the site although they have since left as 2 tourers were present when the Housing Officer visited in October 2021 but no one was on site. The reason provided for them being in the area is to attend cultural events and therefore the fact that they are here for a few months highlights the potential need for a transit site for people who do attend events to be able to stop for a period of time. Although, it is clear that they are there for an extended number of months as another record in March 2019 states that 8 caravans were on site, this could mean that a transit site would not be considered appropriate as they are on site for longer than 3 months. Although, it is believed that various members of the family come and go and therefore may be on the site for less than 3 months, if an authorised transit site was developed the members on site could be monitored through a contract between the council and the residents. Further engagement with the residents of the site at the end of July 2021 indicates that they would not be interested in using a transit site as they have always come to Plwmp and would not want to stay at any other location. Discussions have been ongoing with the temporary residents and landowner which has yielded little in regularising the site. The GT community vary and differ over the summer in essence using the site as a holiday type pitch with multiple families using the site at different times, the landowner has been in ill health and has attempted to lessen the number of visitors

but is unwilling at the present time to regularise the site through the planning system expressing a strong desire to lessen use over time.

Overall, the locations of the encampments indicates that the majority of the need for a transit site could potentially be in the south of the county. Notwithstanding the views of the GT community who have made it expressly clear that if a site were provided, they would choose not to use it as they visit the specific location in Plwmp in a historical context and are not seeking a formal arrangement for an alternative site with the Local Authority.

### **Findings of the 2015/16 Gypsy and Traveller Accommodation Needs Study**

Following the introduction of the Housing (Wales) Act 2014 statutory requirement to produce a Gypsy and Traveller Accommodation Assessment, and assessment was commissioned in 2015 and delivered in 2016. No evidence of need for a permanent or transit site to be provided by the local authority was established by the study. Indeed, the study found that Gypsies and Travellers living in the area had often moved to Ceredigion to have more freedom and therefore would not wish to live on a public site alongside other families. Also, while unauthorised encampments do arise in the county, particularly around the time of the Royal Welsh Show, there was no clear evidence of sufficient need to justify the development of a permanent transit site.

The study did identify a need in the immediate five year period for two private sites, each capable of accommodating one family. One private site with space for five pitches had been granted planning permission at the end of 2010 for a Gypsy Traveller family but restrictive personal and temporary conditions had been imposed. These conditions were rescinded through the appeals process in 2013 and the site is currently occupied by the family under standard GT conditions.

The occupants of the other site did not identify as Gypsy or Travellers and were therefore discounted from the assessment.

### **Housing and Homelessness**

Since the previous Gypsy and Traveller accommodation assessment, progress has been made in the recording of ethnicity whilst monitoring affordable housing in Ceredigion. As a result of this we were able to contact the housing department to try and identify Gypsy and Traveller households in bricks and mortar accommodation. Unfortunately, of the four individuals which were identified in our system, 3 were currently living out of county and therefore were unlikely to have any need for accommodation within Ceredigion and one elderly individual was contacted but had previously registered a need for sheltered bricks and mortar accommodation.

One respondent who is living in a substandard private rented caravan accommodation has registered a need for bricks and mortar accommodation which is being followed up by the Housing / Homelessness Service. It was unclear whether the respondent did meet the Gypsy and Traveller definition in the housing Act. Therefore, checks were carried out to try and determine this by confirming whether there was a history of nomadism etc, and the LA were in the process of seeking a legal opinion when the individual left the county.

Unfortunately, New Age Travellers do not have a defined class in our registers thus do not show as a specific group in our records and therefore are very difficult to engage with countywide. Furthermore there is not a representative body to facilitate engagement, Travelling ahead officers haven't been able to identify any opportunities. We therefore tried to reach out to New Travellers through publicity such as advertising the assessment on social media and placing posters in public places, however this proved futile. Further analysis of the Councils planning system to identify unauthorised caravans was compounded by incomplete data and a significant amount of caravans' complaints being undefined in terms of occupied, tourism based, touring, static, temporary. permanent etc. Thus no formal mechanism exists to filter out potentially unidentified New Age travellers.

### Education

There are currently no traveller education services operating in Ceredigion: no applications have been made for the relevant funding in recent years on the basis of the very small number of children from families identifying as Gypsy or Traveller in the county. As part of the GTAA,

- Letters were sent out to every school in the county requesting posting of posters in the schools or discreet information to any known families to advise of the assessment.
- Family Centres in Ceredigion were contacted in a bid to gain information about any Gypsy and Traveller families who may want to be part of the assessment but unfortunately, we received no response from them.
- A representative from GO Wales, NERS and Youth Services were contacted as they might know of Gypsy and Traveller community members within the education system, but this did not provide any new leads.

### Planning and Enforcement

Development Management and Enforcement Officers were asked to provide guidance on travelling patterns and planning applications. Planning colleagues are aware of the Act and the definition through involvement in the assessment preparation and being members of the GT Steering group.

Records were looked at in a systemic way to try and determine if any particular sites need to be investigated further. Meetings were set up with the Development Management team to discuss their knowledge of Gypsy & Traveller related cases and determine whether any need could possibly be determined. As a constituent part of the steering group and following extensive investigation of the council's data systems it was determined that it wasn't feasible to review every case relating to a caravan given the sheer volume of caravan sites and associated applications and enforcement complaints in Ceredigion. However, the internal planning system was queried for a 5-year period relating to 2016 – 2021 for terms relating to Caravan and the following results returned:

1. 105 planning applications - the majority relating to siting of temporary residential caravans whilst undertaking building works, providing caravans as auxiliary accommodation to a dwelling or business-related activity relating to caravans. There were a small number of certificates relating to retention of caravans as residential accommodation (Non identifying as GT).

2. 111 enforcement queries relating to the term caravan, activity on such cases may well be ongoing, but known deficits in our enforcement resource mean cases are prioritised into high, medium and low, and only those in the high priority category are followed up.
3. 3 appeals in relation to caravans.

The Development Management Service Manager, Senior officers, and planning officers many of whom are chartered town planners and have over 50 years' experience between them were interviewed. These interviews were undertaken to ascertain in their collective experience whether they could identify any cases (planning, enforcement and appeals over the previous 5 years) that may be relevant and consider the definition of GT including that of New Age travellers as outlined in the Housing (Wales) Act 2014 to flag up potential cases, this has to date yielded no further identification of GT/ New Age community in the county.

The main outcome from the meeting with Development Management was historical information in that they were able to provide background information on the authorised private site which was granted permission in December 2010. A subsequent application for the variation of conditions was refused by the authority, but allowed on Appeal in March 2013.

An enforcement notice was served in 2001 on the unauthorised development which had 8 caravans on site in the summer in Plwmp, however no further action has been pursued. The Council is not seeking to pursue further action until the apparent needs arising from the site have been addressed, in many ways it may be prudent to pursue a 'tolerated site' approach.

### Other Agencies

Travelling Ahead is a Welsh project with the overall aim of working alongside Gypsy, Roma and Traveller communities to ensure that they have the opportunity to express their needs, as well as providing them with advice on their rights. Since their remit includes the Gypsy Traveller community in Ceredigion, researchers contacted them directly. However, although project staff were able to act as intermediaries to facilitate site visits, they were unable to provide any additional contacts with the Gypsy Traveller community within the county. The Travelling Ahead staff visited two households alongside the Research Assistant with the aim of completing the questionnaires, although one visit was unsuccessful as the Travellers weren't on the site at the time.

The Showmen's Guild of Great Britain was contacted to establish a formal line of communication with this group, but with no response and therefore no new leads.

### Conducting the assessment

The assessment was conducted in accordance with Welsh Government guidance as outlined above.

The caravan count offered an obvious starting point for the survey and our aim was to conduct as many interviews as possible at the same time as the July 2019 count. During the July count only one unauthorised encampment was identified in

Ceredigion and unfortunately the women on the site were unwilling to speak to the Environmental Health Officer responsible for doing the caravan count therefore no questionnaires were completed. The Research Assistant then attempted to visit the site again alongside representatives from Traveling Ahead but the site was empty during that visit. Initially the interview period was expected to last from July to October 2019 but this was extended twice until the end of November 2019 because of the very poor response levels. Following advice from WG further engagement was sought, however due to the Covid 19 pandemic this was hampered by the restrictions in place. Since restrictions have eased 2021 site engagement has been more fruitful and details of the visits and conversations are included in Annex 2 and 3.

### Assessment Publicity

Publicity for the assessment was crucial. The lack of previous positive engagement between the Local Authority and community members was clearly a particular problem.

Bilingual posters and flyers (see annex 4) were produced which provided an outline of the purpose of the assessment, a contact telephone number, a contact e-mail address specific to the project and a QR code link to the Council's website which highlighted the aim of the assessment. These materials were distributed to all GP surgeries, schools and Council offices in Ceredigion with a request to display the information and to pass on to the project team the contact details of any individuals who requested further information or were interested in participating.

A bilingual webpage was created on the Ceredigion website, as shown in Figure 3 below. The main aim of the webpage was to provide further information about the assessment to potential respondents. A link to the previous Gypsy Traveller Accommodation Assessment conducted in 2015 was also included on the webpage. The CCC bilingual Twitter feed and Facebook pages also carried information about the assessment. Posters were also sent to a representative at the Romani Cultural & Arts Company for their inclusion on their social media.

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Resident / Housing / Gypsy and Traveller Accommodation Assessment (GTAA) 2019

## Gypsy and Traveller Accommodation Assessment (GTAA) 2019

**Your Future, Your Say**  
To speak with the Council, please telephone 01545 570881  
E-mail: [gt@ceredigion.gov.uk](mailto:gt@ceredigion.gov.uk)  
or visit one of the Council offices

Part 3 of the Housing (Wales) Act 2014 requires local authorities in Wales to undertake a Gypsy and Traveller accommodation assessment and, where an unmet need is identified, to make provision for residential site pitches. We therefore need to talk to the Gypsy, Traveller and Travelling Showpeople communities to find out whether your family needs a residential pitch, house or transit site.

The definition of the target community as it appears in Section 108 of the Housing (Wales) Act 2014 is:

Persons of a nomadic habit of life, whatever their race or origin, including:

- persons who, on grounds only of their own or their family's or dependant's educational or health needs or old age, have ceased to travel temporarily or permanently, and
- members of an organized group of travelling show people or circus people (whether or not travelling together as such); and
- all other persons with a cultural tradition of nomadism or of living in a mobile home.

The assessment is meant to be carried out every 5 years but Ceredigion Council are conducting ours earlier in relation to the development of the Local Development Plan (LDP).

We are hoping to talk to as many families and individuals as possible before the 12<sup>th</sup> November 2019 in order to produce a robust evaluation of need in Ceredigion. Information collected during the survey will be used to determine how many pitches are needed within the county, both now and in the future. Any personal data gathered will be held under our privacy notice which is available on our website: [Privacy Notice](#).

The GTAA will be carried out in accordance with statutory guidance issued by Welsh Government available at: [Gypsy and traveller accommodation assessments: guidance](#).

If you have any further questions about the assessment, or if you would like to take part in the survey, please email [gt@ceredigion.gov.uk](mailto:gt@ceredigion.gov.uk) or telephone 01545 570881.

**Gypsy and Traveller Accommodation Assessment 2015-16**

Ceredigion County Council undertook a Gypsy and Traveller Accommodation Assessment (GTAA) in 2015-16 with the aim of establishing the need for transit, temporary or permanent pitch provision over the next five years and over the fifteen year period of the local development plan (LDP) 2007-2022. The report can be found [here](#).

[Gypsy and Traveller Accommodation Assessment 2015-16](#)

**Contact**

[Our Online Contact Form](#)

[Online Form](#)

[Full contact details Community Wellbeing Team](#)

**You are in**

- ▲ Housing
- ▶ Empty Properties
- ▶ Financial Assistance
- ▶ Homelessness
- ▶ Homeowner Zone

**Figure 3: Ceredigion County Council GTAA web page**

Dyfed Powys Police, Hywel Dda, Ceredigion Council Youth Officers and Ceredigion NERS officers were contacted to enquire if they knew of any Gypsy and Travellers who may be in need in Ceredigion but they did not provide any new leads.

### Assessment Approach

The preference was to undertake face to face interviews, however where these or telephone interviews were declined questionnaires were sent by post and email which resulted in two responses. The methods of engagement and the responses received can be found in the interview log (annex 2).

A member of the Gypsy Traveller community who has been re housed in bricks and mortar since the last assessment was happy to take part in an interview and a questionnaire was filled in on their behalf by the Research Assistant as the interview was being conducted. Members of Travelling Ahead were also present as they were

known to the contact and therefore provided reassurance to the interviewee. The outcome of this questionnaire response was that their accommodation needs are being met through bricks and mortar. Unfortunately Travelling Ahead had very few contacts within Ceredigion although working with them did help to broker trust and maximise respondent engagement.

A completed questionnaire was returned to us from an individual currently living in a privately rented caravan. A site visit and a telephone interview was offered but the interviewee wanted to fill in the questionnaire himself.

If the conversation around the questionnaire strayed onto other topics, respondents were encouraged to explore any themes that might enhance CCC's comprehension of their needs. In particular, officers probed for more information on transit patterns to gauge where and when need might arise and why the interviewee considered that there was an unmet need.

Effort was made to follow up with the contact that now lives on a private site with planning permission but we received no response which leads to us assuming that they are currently happy with their accommodation needs and do not require an authorised site.

Names and addresses were recorded so that those that wished to be kept up-to-date could be contacted but all responses are confidential and have been anonymised in this report.

### Constraints to respondent engagement

The primary obstacle to be overcome was making initial contact with the target population. Thereafter, the intention was to use snowballing techniques to widen the reach of the survey. However, several major constraints were recognised at the outset:

- The difficulty involved in identifying Gypsies and Travellers living in bricks and mortar
- Relatively low literacy rates within the Gypsy and Traveller communities
- The poor history of engagement between Ceredigion County Council and the Gypsy and Traveller community
- No recent engagement with New Travellers
- Limited representatives for the Gypsy Traveller community operating in Ceredigion

## 6. Survey Findings

Despite considerable efforts, we only received formal responses from two households, but did engage with a third household following easing of covid restrictions in 2020. A deliberate attempt to avoid making the information about such a small number of people disclosive has been made. There is no doubt anyone with a strong desire to do so could identify individuals from the information currently provided in this document and we believe this is inappropriate. It is not our intention to provide any more than the minimum of information which might be used for this purpose.

Table 2 below shows the number of responses by type of accommodation.

**Table 2: Number of respondents by dwelling type**

Type of accommodation	Households contacted	Completed questionnaires
<b>Council residential site</b>	0	0
<b>Council transit site</b>	0	0
<b>Private site:</b>		
– with planning permission	1	0
– without planning permission	0	1
- subject to appeal	0	0
<b>Residential Caravan Park</b>	0	0
<b>Unauthorised encampment</b>	1	0
<b>Bricks and mortar</b>	3	1
- socially rented	3	1
- privately rented	0	0
- tenure unknown	0	0
- owner-occupied	0	0
<b>No fixed abode – currently travelling</b>	0	0
<b>Homeless Hostel</b>	0	0
<b>Total</b>	5	2



The ethnicity of respondents is shown in Table 3 and the age profile is shown in Table 4 below.

**Table 3: Ethnic breakdown of respondents**

Ethnicity	No. of individuals
'Romani'/ 'Romani Gypsy'/ 'Romani Traveller'/ 'Welsh Romani'/ 'British Romani'	1
'Irish Traveller'	0
'New Traveller'	0
'English Traveller'	0
Gypsy Traveller	0
'Traveller'/ 'Welsh Traveller'/ Old Traveller	0
'Showperson' / 'Welsh British Showperson'	0
'Roma Gypsy'	0
'Gypsy'/ 'Welsh Gypsy'/ Welsh British Gypsy	0
White British/ White Welsh British	1
'Other'/ Non response	0
Non Gypsy Traveller	0
<b>Total</b>	<b>2</b>

**Table 4: Age profile of respondents**

Age	Frequency
0 < 10	0
10 < 20	0
20 < 30	0
30 < 40	1
40 < 50	0
50 < 60	0
60+	1
No response	0
<b>Total</b>	<b>2</b>

Given the poor response rate, it is not possible to infer robust or meaningful conclusions regarding the demographic profile of the Gypsy and Traveller community in the county.

**Table 5: Number of households satisfied with accommodation**

Type of accommodation	No. of households satisfied with accommodation	No. of households dissatisfied with accommodation	Percentage of households satisfied w. accommodation
Local Authority residential site	-	-	-
Council transit site	-	-	-
Private site			
- with planning permission	-	-	-
- without planning permission	-	-	-
- subject to appeal	-	-	-
Unauthorised encampment	0	1	0%
'Bricks and mortar'	1	0	100%
- socially rented	1	0	100%
- privately rented	-	-	-
- owner-occupied	-	-	-
Homeless hostel	-	-	-
No fixed abode – currently travelling	-	-	-
Total	1	1	50%

It is evident from the table that most of the known Gypsy Traveller community in Ceredigion is satisfied with their current accommodation.

The only exception was the individual who came forward stating that the caravan he currently resides in is inadequate, although he has since left the county and we are therefore assuming that his need has been met elsewhere.

### Needs calculations

The calculation of the overall residential need takes into account the number of households who are likely to be seeking pitches, and the expected number of pitches likely to become available. The calculation is composed of the following elements:

Spaces that will become available:

- Current empty pitches
- New sites or site extensions which are likely to gain planning permission
- Migration away from the area
- Movement to bricks and mortar
- Dissolution of households

Groups of people:

- seeking permanent site accommodation in the area
- on unauthorised encampments
- on unauthorised developments for which planning permission is not expected
- on a currently overcrowded pitch
- new households expected to arrive from elsewhere
- new family formation from within existing households
- in housing but with a need for site accommodation

### Residential need

The interview conducted with a member of the Gypsy Traveller community who now resides in bricks and mortar reported that she was happy with her current accommodation.

A respondent staying in a privately rented caravan identified as a New Traveller and stated that his current accommodation was unsatisfactory which highlights a need for accommodation. However following further enquiries, we were investigating whether the individual qualifies for inclusion in this assessment. To try and determine whether this individual did meet the criteria we did try and discuss his background and patterns of nomadism with him. We were in the process of discussing the matter with the legal department but prior to the assessment finalisation, we were informed that the individual has left the County and is currently living in Carmarthenshire.

Welsh Government Guidance on undertaking the GTAA advises using a growth rate derived from the survey process and sense-checked against research literature in order to calculate the necessary site provision required over the fifteen year period of the LDP. However, with only three years of the current LDP left to run and the extremely low number of responses, it is impossible to derive a robust average growth rate from the survey.

Since there are no Local Authority pitches, there is no information from which to calculate an estimated pitch turnover rate. On the basis of the survey information, the one private site in the county which is currently occupied by a single household, we do not anticipate that any of these pitches will become available in the foreseeable future. They did not respond to the survey and therefore it is not possible to know the number of new households which may form in the next five to ten years but the five pitches on the current site should be able to accommodate any such growth.

A summary of identified need is provided in Table 6 below.

**Table 6: Residential need by type of pitch**

<b>Current residential supply</b>	<b>No. of pitches / (households)</b>
A. Occupied Local Authority pitches	0
B. Occupied authorised private pitches	5 (1)
<b>Total</b>	<b>5 (1)</b>

<b>Planned residential supply</b>	<b>No. of pitches/ (households)</b>
C. Vacant Local Authority pitches and available vacant private pitches	0
D. Pitches expected to become vacant in the near	0
E. New Local Authority and private pitches with planning permission	0
<b>Total</b>	<b>0</b>

<b>Current residential demand</b>	<b>No. of pitches/ (households)</b>
F. Unauthorised encampments	0
G. Unauthorised developments	6 (3)
H. Overcrowded pitches	0
I. Conventional housing	0
J. New households to arrive	0
<b>Total</b>	<b>6 (3)</b>

<b>Current households</b>	<b>Future households (at year five)</b>	<b>Future households (Plan period 2033)</b>
K. 4	4	5
<b>L. Total additional pitch need</b>	<b>0</b>	<b>1</b>

<b>Unmet need</b>	<b>Need arising</b>	<b>Need accommodated</b>
M. Current residential demand	3	
N. Future residential demand (five-year)	0	-
O. Future residential demand (Plan period to 2033)	1	
P. Planned residential supply	0	-
<b>Q. Unmet need (five-year)</b>		<b>3</b>

<b>R. Unmet need (Plan period 2018-2033)</b>	<b>4</b>
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### **Additional household need**

Rather than using pitches as the basis for the above calculations, the number of households have been used as they provide a more accurate baseline to project forward from. The reason for this decision is because we are aware that one household (occupied authorised private pitches) have in effect, future proofed this site for their family through seeking permission for 5 pitches (which has been granted). As this site has been future proofed, the immediate need has been met, and therefore it is most appropriate to utilise the household figures as the basis for the calculations.

In order to calculate the additional household need over the plan period (2018 to 2033), the current households of 4 is used followed by a 1.5% annual growth rate, which estimates a further 5 households by 2033. In the absence of robust information from the local survey, a demographic analysis of Ceredigion's Gypsy and Traveller population using Census 2011 and 2021 data is used for the basis of this decision.

Since the 2011 Census, the resident population has decreased by 5.8%, at the same time, the number of Gypsy and Traveller residents decreased by 22.9%. Furthermore, the median age of Ceredigion's Gypsy and Traveller population (35 to 49 years old) is too high for a growth rate of 3%. For example, even assuming zero deaths in the population, achieving an annual population growth of 3% (i.e., doubling every 23.5 years) would require half of the year one population to be aged under 23.5 years. This analysis indicates that the growth level is at the lowest point of Welsh Government's suggested growth rate range (1.5% to 3.0%).

### **Unmet need**

The current residential demand and additional household need provide a total unmet need of 3 households over the first 5 years and 4 households over the 15-year period (2018 to 2033).

Following consideration of the survey responses and all other data resources, No need for permanent residential site provision has been identified.

### **Transit Need**

The caravan count indicates some transit movements occurring in the spring and summer months, in particular around Plwmp where eight caravans were present at the end of July 2019. Although since, the start of 2020 it appears that the activity at this site has decreased dramatically as the number of caravans on site were 0 up until the caravan count in July 2021. The caravans on this particular site seems to be a seasonal encampment, primarily occupied in the summer months as the number of caravans is much higher in July than in January. This encampment is associated with the annual horse sales in Carmarthen, summer holidays and with working locally. This encampment is on private land owned by a third party, is occupied without planning consent and has been subject to past enforcement action.

It would appear that transit patterns in Ceredigion tend to be associated with the Royal Welsh Show, seasonal self-employment and pastoralist traditions. Although one respondent stated that they believed that a transit site is needed in Ceredigion as they tend to stay in one place for 1-2 weeks. If they were to do so on an unauthorised encampment they would risk being asked to leave the site. Although the latest entry from the caravan count system indicated 0 caravans on the unauthorised development, up to 13 caravans have been recorded at the site in the past. In addition, there appears to be a few unauthorised encampments in the south of the County some years. Together, this could indicate a need for transit site provision. According to the designing gypsy traveller site guidance, transit site pitches should be capable of accommodating two touring caravans per pitch. It is therefore considered that a transit site for potentially up to 10 pitches would accommodate the needs of those at the unauthorised development as well as those of any other ad hoc short term unauthorised encampments in the County.

Further engagement with the residents at Plwmp occurred during the travelling season of 2021 whereby the group outlined that they had a historic connection with this landowner having visited this site to assist on the farm since the 1940's. However, they now did little in the way of farm work, considering this visit more of a summer holiday to visit old friends. It has come to the Local Authorities attention that the previous landowner has passed away and the new landowner is keen to lessen the use and length of the season. Thus, in the 2021 travelling season the site was occupied for fewer weeks by women and children only, it is clear the landowner has a strong intention to lessen its use and manage the site better and the GT community appear to be mindful of this. No complaints have been received by the LA during this travelling season. The maximum number of caravans on site during this season was 6. The housing officer carried out welfare checks on the site and tried to engage with the residents on numerous occasions. The leader of the group did engage with the housing officer and advice was provided re sightseeing locations and covid vaccinations, the GT community present stated that they would not be interested in using a transit site in Ceredigion as they had historically visited the Plwmp site.

The LA have considered a variety of options for the Plwmp site previously engaging with the prior owner as to regularising the site through planning and highways, however the previous owner was reluctant to engage with the LA. The new owner whilst not formally wanting to regularise the site through a planning application, is hoping to minimise use. Thus, now is an opportune time to work with the landowner to come to a mutually agreeable solution for all parties.

Ceredigion currently has no resident Show People and only has regular visits in July for the New Quay fair and in November for the Aberaeron, Aberystwyth and Cardigan fairs. An attempt to engage the Showmen's Guild to assess whether they had further accommodation needs received no response.

### Difficulties encountered

Establishing contact with the target community continues to prove difficult.

Since we were able to contact only one household living in conventional housing, we have no more information on the views of the Gypsy Traveller community in this situation.

Another obstacle was the Covid-19 pandemic as it made engagement with the Gypsy Traveller community impossible during the travelling season of 2020 due to strict restrictions. As restrictions eased a little during 2021, the Housing Officer was able to visit the site more freely and was able to engage. Unfortunately, a representative from Travelling Ahead was not able to visit the site too as they still didn't have the authority to approach sites due to the pandemic.

## 7. Conclusions and Recommendations

The survey was undertaken between July 2019 and October 2021, following Welsh Government guidance and using methodology agreed by the Steering Group. The survey period was extended beyond its original planned deadline because of the disappointing response rate, and the covid 19 pandemic and every effort was made to contact members of the Gypsy Traveller community and travelling show people. However, success was very limited: no Gypsy Traveller households living in caravans completed the survey; only one community member living in bricks and mortar completed a questionnaire; members of a travelling circus and Show People at the local fairs all declined to take part in the assessment; one New Traveller was identified but later left the authority area.

Based on the evidence gathered, there is no need for permanent residential provision, however, a potential need for transit provision has been identified over the replacement LDP period which ends in 2033. However, this is provisional in the sense engagement with the GT community who visit Ceredigion during the summer has revealed a strong preference to continue using the unauthorised site and no desire to use a formal transit site. Therefore, the local authority proposes to work with the new landowner of the site on potentially developing a memorandum of understanding regarding enforcement action and work towards the site becoming a formally 'tolerated encampment' in line with the provisions as set out in the WG Guidance on managing Unauthorised Camping 2013. Whilst the landowner for their part works to lessen the use of the site as they have demonstrated they are able during this past travelling season.

The reasons for this are two-fold – firstly in understanding the historic connection the GT community have with this particular location the LA would not want to disrupt a generational gathering on private land without exceptional reasons and secondly the new landowner has not had sufficient opportunity to regularise the use as they so wish to do. Adopting such an approach during the next GTAA period would allow further monitoring of the site, engagement with the residents and outcome of discussions to be realised, if however, use increases and enforcement action becomes inevitable this will be reported in the next GTAA and a transit site solution may need to be found.

It is the intention of the LA to work with the landowner on agreeing a 'Negotiated Code of Conduct for tolerated stopping', alongside formal acceptance that enforcement proceedings will not be brought subject to the code of conduct being met. The LA will also consider options around site safety in conjunction with the highway's authority.

It may be that the current lack of sites and lack of engagement are deciding factors in the decision to travel or to live in Ceredigion, but unless a dialogue between the Council and the target community can be established, assessing need will continue to be extremely challenging.

With the help of Travelling Ahead representatives, the authority will closely monitor encampments and again explore opportunities to engage with the Gypsy Traveller



community during the next travelling season, so that a better understanding of their specific needs can be obtained. The LA will also work with organisations outside of the county namely CAT the Centre for Alternative Technology to better understand the needs of any New Age Travellers in the county for whom we as well as Travelling Ahead have also struggled to identify and engage with.

## Beyond 2022

Ceredigion County Council is committed to equality and community cohesion. Going forward, the priority must be to develop mutual understanding and to improve community engagement. It would appear that the majority of the Gypsy Traveller community has integrated into the settled community but the Council will continue to monitor the situation.

The authority regularly sends representatives to the All Wales Gypsy and Traveller Accommodation Forum. The Council is actively developing its equality agenda in response to the 2010 Act and recognises Gypsy Traveller ethnicity as a protected characteristic.

The Council is supported by a Regional Community Cohesion Co-ordinator who is currently working to a regional Action Plan. Within the Regional Plan which runs until the end March 2021 there is an objective which states that they:

- Have a dedicated team and assigned officer to support Gypsy and Traveller community.
- Are actively developing a new site for Llanelli in addition to the existing one.
- Will provide cohesion support around proposed and approved Gypsy and Traveller Accommodation sites, including promoting the needs of Gypsy and Traveller communities in the site selection process.
- Will support media strategies and community engagement in relation to sites.
- Will support Elected Member training regarding their duties and planning processes in relation to sites.

Officers will work to ensure the one identified site which is used for a few weeks a year is regularly monitored and welfare checks are completed. Officers will engage with the landowner and residents where possible to work towards a mutually agreeable solution. The LA will also publish its decision making in this regard to ensure openness and transparency for the public.

Officers will work with the planning and enforcement sections to better capture data on caravans that could potentially be GT or New Age Travellers to strengthen the evidence base in the next 5-year GTAA period.

Given the introduction of The Corporate Joint Committee (General) (No.2) (Wales) Regulations 2021 coming into force and the requirement under said regulations to undertake a Strategic Development Plan, officers will work on establishing and addressing cross border GTAA needs.

Officers will continue to update the caravan count system as it provides a better means of monitoring patterns of Gypsy and Traveller migration by recording encampments in real time rather than at fixed points in the year. This will offer the opportunity for Council officers to interact more effectively with the travelling population and to build up a more comprehensive picture of when, how and by whom transit routes are used.

With a better grasp of the size and location of the target population, it will be possible for the Council to provide more effective support to the community, e.g. if literacy is a barrier to accessing services then appropriate assistance can be provided. This may make the planning process easier to navigate and facilitate the provision of private sites both now and in the future.

Working more closely with Travelling Ahead and other similar bodies may eventually open doors to the Gypsy Traveller population within the county as the tenor of Welsh Government policy on their particular needs becomes more widely known and accepted.

## Annex 1: Definitions

Table 7: Summary of definitions

Gypsy and Travellers	<p>(a) Persons of a nomadic habit of life, whatever their race or origin, including:</p> <ul style="list-style-type: none"><li>(1) Persons who, on grounds only of their own or their family's or dependant's educational or health needs or old age, have ceased to travel temporarily or permanently, and</li><li>(2) Members of an organized group of travelling show people or circus people (whether or not travelling together as such); and</li></ul> <p>(b) All other persons with a cultural tradition of nomadism or of living in a mobile home.</p> <p>Source: Section 108, Housing (Wales) Act 2014</p>
Residential site	<p>A permanent residential site can be privately owned or owned by the Local Authority. This site will be designated for use as a Gypsy and Traveller site indefinitely. Residents on these sites can expect to occupy their pitches for as long as they abide by the terms of their pitch agreements, under the Mobile Homes (Wales) Act 2013. Working space may also be provided on, or near, sites for activities carried out by community members.</p>
Temporary residential site	<p>These sites are residential sites which only have planning permission or a site licence for a limited period. Residents on these sites can expect to occupy their pitches for the duration of the planning permission or site licence (or as long as they abide by the terms of their pitch agreements, under the Mobile Homes (Wales) Act 2013 – whichever is sooner).</p>
Transit site	<p>Transit sites are permanent facilities designed for temporary use by occupiers. These sites must be designated as such and provide a route for Gypsies and Travellers to maintain a nomadic way of life. Individual occupiers are permitted to reside on the site for a maximum of 3 months at a time.</p> <p>Specific terms under the Mobile Homes (Wales) Act 2013 apply on these sites. Working space may also be provided on, or near, sites for activities carried out by community members.</p>
Temporary Stopping Place	<p>Also known as a 'stopping place', 'Atchin Tan', or 'green lane', amongst other names. These are intended to be short-term in nature to assist Local Authorities where a need for pitches is accepted, however, none are currently available. Pro-actively identified temporary stopping places can be used to relocate inappropriately located encampments, whilst alternative sites are progressed.</p> <p>Temporary stopping places must make provision for waste disposal, water supply and sanitation at a minimum.</p>

Residential pitch	Land on a mobile home site where occupiers are entitled to station their mobile homes indefinitely (unless stated in their pitch agreement). Typically includes an amenity block, space for a static caravan and touring caravan and parking.
Transit pitch	Land on a mobile home site where occupiers are entitled to station their mobile homes for a maximum of 3 months. Transit pitches can exist on permanent residential sites, however, this is not recommended.
Unauthorised encampment	Land occupied without the permission of the owner or without the correct land use planning permission. Encampments may be tolerated by the Local Authority, whilst alternative sites are developed.
Unauthorised development	Land occupied by the owner without the necessary land use planning permission.
Current residential supply	The number of authorised pitches which are available and occupied within the Local Authority or partnership area. This includes pitches on Local Authority or private sites.
Current residential demand	Those with a need for authorised pitches for a range of reasons, including: <ul style="list-style-type: none"> <li>• an inability to secure an authorised pitch leading to occupation of unauthorised encampments;</li> <li>• an inability to secure correct planning permission for an unauthorised development;</li> <li>• households living in overcrowded conditions and want a pitch;</li> <li>• households in conventional housing demonstrating cultural aversion;</li> <li>• New households expected to arrive from elsewhere.</li> </ul>
Future residential demand	The expected level of new household formation which will generate additional demand within the 5 year period of the accommodation assessment and longer LDP period.
Overall residential pitch need	The ultimate calculation of unmet accommodation need, which must be identified through the Gypsy and Traveller accommodation assessment process. This figure can be found by adding the immediate residential need to the future residential demand. The overall residential need will capture the needs across the 5 year period within which the accommodation assessment is considered to be robust.

Planned residential pitch supply	The number of authorised pitches which are vacant and available to rent on Local Authority or private sites. It also includes pitches which will be vacated in the near future by households moving to conventional housing or in other circumstances. Additional pitches which are due to open on private sites likely to achieve planning permission shortly should be included as planned residential supply.
Household	This refers to individuals from the same family who live together on a single pitch / house / encampment.
Concealed or 'doubled-up' household	This refers to households which are unable to achieve their own authorised accommodation and are instead living within authorised accommodation (houses or pitches) assigned to another household.  This may include adult children who have been unable to move home or different households occupying a single pitch.
Household growth	Household growth is defined by the number of new households arising from households which are already accommodated in the area.

Extract from Mobile Homes (Wales) Act 2013

### **60 Meaning of “mobile home”**

- (1) In this Act “mobile home” means any structure designed or adapted for human habitation which is capable of being moved from one place to another (whether by being towed, or by being transported on a motor vehicle or trailer) and any motor vehicle designed or adapted for human habitation, but does not include—
- (a) any railway rolling stock which is for the time being on rails forming part of a railway system, or
  - (b) any tent.
- (2) A structure designed or adapted for human habitation which—
- (a) is composed of not more than 2 sections separately constructed and designed to be assembled on a site by means of bolts, clamps or other devices, and
  - (b) is, when assembled, physically capable of being moved by road from one place to another (whether by being towed, or by being transported on a motor vehicle or trailer), is not to be regarded as not being (or as not having been) a mobile home for the purposes of this Act by reason only that it cannot lawfully be moved on a highway when assembled.

- (3) For the purposes of this Act “mobile home” does not include a structure designed or adapted for human habitation which falls within subsection (2)(a) and (b) if its dimensions when assembled exceed any of the following limits, namely—
- (a) length (exclusive of any drawbar): 20 metres,
  - (b) width: 6.8 metres, and
  - (c) overall height of living accommodation (measured internally from the floor at the lowest level to the ceiling at the highest level): 3.05 metres.
- (4) The Welsh Ministers may by order substitute for any figure mentioned in subsection (3) such other figure as may be specified in the order.

## Annex 2: Activity Log

Code	Type of tenure	Interview attempts			Engagement techniques used	Questionnaire completed or refusal?	Reasons for refusal?
		x	x	x			
GTA A_1	Unauthorised encampment	x	x	x	Knocked on door/Visit	refusal	Only women were present on the site when the Officer responsible for the caravan count visited and they refused to interact with him. Site was empty when the Research Assistant and Representatives from Travelling Ahead visited. Multiple attempts made by the housing officer to engage throughout 2021 but individuals on site made it clear that they wouldn't be interested in a transit site.
GTA A_2	Bricks and Mortar	x			Arranged a home visit	completed	Happy with current accommodation
GTA A_3	Private Authorised Encampment	x	x		Sent out a questionnaire, email	completed	Discussed the assessment with the individual and they showed an interest in taking part. A questionnaire was sent out alongside the offer of a site visit or completing the questionnaire over the phone. A completed

Code	Type of tenure	Interview attempts	Engagement techniques used	Questionnaire completed or refusal?	Reasons for refusal?
					questionnaire was posted back.
GTA A_4	Private Authorised Site	x	Sent out a letter	refusal	No response but have received no further planning applications and therefore assuming there's no further need.



## Annex 3: Interview Log

Date of engagement	Type of Tenure	Number of Caravans Present	Discussion
Jul-19	Unauthorised Encampment - Plwmp Site	13	Officer responsible for the caravan visited the Plwmp site - only women were present on the site and they refused to interact with him.
29.10.19	Private Authorised Encampment	5	Sent a letter to a private authorised encampment but didn't receive a response, haven't received any further planning applications and therefore assuming there's no further need.
07.11.19	Unauthorised Encampment - Plwmp Site	0	Site was empty when the Research Assistant and Representatives from Travelling Ahead visited.
07.11.19	Bricks and Mortar	0	Visited an individual who lived in bricks and mortar who we identified by using the housing register with representatives from Travelling Ahead. A questionnaire was completed and the individual was happy with their current accommodation.
14.11.19	Private Authorised Encampment	0	Discussed the assessment with an individual who made contact and identified themselves as a traveller. They showed an interest in taking part, therefore a questionnaire was sent out alongside the offer of a site visit or completing the questionnaire over the phone. A completed questionnaire was posted back.
20.01.21	Unauthorised Encampment - Plwmp Site	0	Housing Standards Officer passed the site and the site was closed and no caravans present.
17.05.21	Unauthorised Encampment - Plwmp Site	0	Housing Standards Officer visited the site and the site was still closed and no caravans present.
03.07.21	Unauthorised Encampment - Plwmp Site	0	Housing Standards Officer passed the site and the site was closed and no caravans present.
End of July	Unauthorised Encampment - Plwmp Site	0	Housing Standards Officer visited the site 5 times over the summer, the Gypsy and Traveller community arrived on site at the end of July.
3.08.21	Unauthorised Encampment - Plwmp Site	6	Visited the Plwmp site, however, only women and children were present and therefore, decided not to

			approach and return later on in the month.
12.08.21	Unauthorised Encampment - Plwmp Site	6	Visited the Plwmp site, still only women and children present. Engaged with the community to carry out a welfare check – confirmed that everyone is well and satisfied. 6 touring caravans were present on site (women and children only). There is access to two toilets, access to water, access to showers (included within the caravans), and refuse and recycling is being collected by CCC. The caravans also have electric hook-ups. A discussion was had on providing covid-19 vaccinations to the community, a follow up visit will be undertaken next week with some further information on covid-19 vaccinations and pregnancies. The community are returning to Ireland in two weeks' time.
17.08.21	Unauthorised Encampment - Plwmp Site	5	5 touring caravans on site. Visited the site to provide further information on the Covid-19 vaccines. Housing Standard Officer spoke to the NHS and it was suggested that there was little point in the community getting vaccinated here as different vaccines are used in Ireland. Details of the nearest covid-19 centre was provided as a negative covid-19 result is a requirement to return back to Ireland. As the community was concerned about the vaccine myths, details on the vaccine was provided. Contact details of the housing Standards Officer was given to the community if they wanted to engage any further. Questions were asked re: need for transit site, they stated that they were not interested as they only came historically to the Plwmp site.
07.09.21	Unauthorised Encampment - Plwmp Site	4	4 Touring Caravans present, however, no one on site. Housing Standards Officer will continue to monitor the site to see if the community have returned to Ireland.
06.10.21	Unauthorised Encampment - Plwmp Site	4	4 Touring Caravans present and one small white van (Renault Kangoo), however no one on site.

13.10.21	Unauthorised Encampment - Plwmp Site	2	2 tourers and 1 old rusty grey ford, nobody on site.
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## Annex 4: Questionnaire

### SECTION A – YOUR HOME

#### A1 Where do you live now?

Local Authority (“Council”) residential site	
Council transit site	
Private site with planning permission	
Private site currently without planning permission	
Unauthorised encampment	
Bricks and Mortar – Socially Rented	
Bricks and Mortar – Privately Rented	
Bricks and Mortar – Owner Occupied	

#### A2 Are you satisfied with your current accommodation?

Yes	
No	
Prefer not to say	

If ‘no’ please explain what could be improved:

#### A3 Can you tell me why you live here?

Local connections (family or work)	
No alternative authorised pitch	
Can’t find a house to move into	
Health or age reasons	
Prefer houses to caravans	
Other:	

**A4 How long have you lived here?**

Less than 1 month	1–6 months	7 – 12 months	1 - 2 years	2-5 years	Over 5 years

**A5 If you have moved within the last year, was your last home in this Local Authority?**

**YES / NO**

Please give details below:

Type of accommodation	Did it have planning permission?	Which Local Authority was it in?	Why did you leave?

**A6 How long do you think you'll stay here?**

1 or 2 days	3 – 28 days	1 – 3 months	3 months – 2 years	2 – 5 years	Over 5 years	Do not intend to move	Don't know

**A7 Would you stay longer if changes or improvements were made to your current accommodation?**

*(Note: The Local Authority may not be able to make these improvements but understanding the problems with your accommodation may help)*

**YES**

**NO**

Reason	Tick
Repairs needed	
Site made bigger	
Accommodation made safer	
Planning permission granted	
Adaptations needed (please state below)	

Reason	Tick
Just passing through	
Want authorised pitch in other area	
Want to move into housing	
Relationships broken down	
Prefer living in caravan	

Other:

**SECTION B – YOUR FAMILY**

	Relationship to respondent (eg. Spouse, son/daughter etc)	Age	Gender	Romani / Irish Traveller / New Traveller / Showperson / Roma / Other (Self-ascribed)	Are there any reasons why you cannot continue to live in this accommodation? (give details)
Respondent					
Person 2					
Person 3					
Person 4					
Person 5					
Person 6					
Person 7					
Person 8					
Person 9					
Person 10					
Person 11					
Person 12					

*If not living in caravans proceed to B4.*

**B2 If living in caravans, are there enough sleeping areas for all residents?**

**YES / NO**

**B3 Is there room on the pitch for additional trailers to prevent overcrowding?**

*(Note: guidance suggests that there should be 6 metre gap between trailers and 3 metre gap to boundaries to be safely accommodated on pitch)*

**YES / NO**

**If yes, how many additional sleeping areas can be added?**

**B4 Would anyone in your family like to join the Local Authority waiting list for pitches or housing?**

**YES / NO**

**Please provide address for application pack to be posted to below:**  
*Please state if already on a waiting list and which.*



## SECTION C – YOUR PLANS

### C1 Are you planning to move into other accommodation?

Yes	Go to C2	
No	Go to D1	
Prefer not to say	Go to D1	

### C2 Where are you planning to move to?

Within the Local Authority	
Another Local Authority in Wales – please state which:	
Somewhere else in the UK	

### C3 Why are you planning to move?

Need more space	
Need different facilities	
Local connection (family or work)	
Need to be closer to services – schools etc (Please give details below)	
Employment opportunities	
Other (Please specify below)	

**Services:**

**Other:**

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### C4 What type of accommodation are you planning to move to?

<b>1. Site</b>	
Council / Social rented	
Private site owned by self	
Private site owned by other	

<b>2. Bricks and Mortar</b>	
Owner / occupied	
Rent from Council / Housing Association	
Rent from private landlord	

**C5 Do you own land in the Local Authority which you would like to be considered as a possible future site?**

*(Note: Interviewer to explain that there is no guarantee that the site will be allocated or developed but planning officers may contact respondent to discuss their situation and offer support)*

Yes	<i>Give details below</i>	
No	<i>Go to C6</i>	
Prefer not to say	<i>Go to C6</i>	

**If you like the Local Authority to discuss these plans with you, provide contact details below:**

		YES	NO
<b>C6</b>	<b>If you are looking for an authorised pitch, would you live on a site managed by the Local Authority if offered one?</b>		
<b>C7</b>	<b>If an authorised pitch was available in another Local Authority, would you consider moving there?</b>  <b>If ' yes', which Local Authorities?</b>		

## SECTION D - FAMILY GROWTH

**D1 Is anyone in your household likely to want to move to their own home in the next 5 years?**

Yes	<i>Go to D2</i>	
No	<i>Go to D4</i>	
Don't know	<i>Go to D4</i>	
Prefer not to say	<i>Go to D4</i>	

**D2 Will this be in this Local Authority?**

Yes	<i>Go to D3</i>	
No	<i>Go to D4</i>	
Prefer not to say	<i>Go to D4</i>	

**D3 How many new households will there be and when will these be needed?**

	Type of accommodation (LA site; private site; B&M housing)	No. of people	Now	Within a year	1-2 years	2-5 years
Household 1						
Household 2						
Household 3						
Household 4						

**D4 Do you have family members living outside this area who camp in this Local Authority regularly?**

Yes	<i>Go to D5</i>	
No	<i>Go to E1</i>	
Don't know	<i>Go to E1</i>	
Prefer not to say	<i>Go to E1</i>	

**D5** If they would like to be interviewed about the need for pitches, provide their contact details and Local Authority where they currently live below:

**SECTION E - TRANSIT SITES**

**E1** Have you camped by the roadside / on an unauthorised encampment / on a transit site in Wales while travelling in the past year?

*(Prompt: this information is only to be used to understand if more transit sites are needed)*

Yes	Go to E2	
No	Go to E4	
Prefer not to say	Go to E4	

**E2** In which Local Authority areas have you camped?

Prefer not to say	
-------------------	--

**E3** How long would you usually stay in one place whilst travelling?

1 – 2 days	3 days – 1 week	1 – 2 weeks	2 weeks – 1 month	1 – 3 months

**E4** Do you think there is a need for more transit sites in Wales?

Yes	Go to E5	
No	Questionnaire ends	
Prefer not to say	Questionnaire ends	

**E5 Where are they needed?**  
*(Probe for Local Authorities and specific locations)*

Prefer not to say	

**Questionnaire ends.**

## Annex 5: Bilingual Posters

A law called the Housing (Wales) Act 2014 means that Councils must assess and make provision for the accommodation needs of Gypsies and Travellers in their area.

The Council would like to speak with all Gypsies and Travellers living in the county or travelling through it to find out whether your family requires a residential pitch or a yard.

# Gypsy and Traveller Survey



## Your Future, Your Say

To speak with the Council, please telephone 01545 570881



e-mail: [gt@ceredigion.gov.uk](mailto:gt@ceredigion.gov.uk)

or visit one of the Council offices



We would like to speak to you before the 12<sup>th</sup> of November 2019

Mae Deddf Tai (Cymru) 2014 yn ei wneud yn ofynnol i bob awdurdod lleol asesu anghenion llety Sipsiwn a Theithwyr a darparu safleoedd priodol pan nodir bod yna anghenion llety sydd heb eu diwallu.

Mae'r Cyngor eisiau siarad gyda'r holl Sipsiwn a Theithwyr sy'n byw yn y sir neu'n teithio drwyddi er mwyn darganfod os oes angen llain breswyl neu iard ar eich teulu.

# **Aseiad o Lety Sipsiwn a Theithwyr**



## **Eich Dyfodol, Eich Barn**

I siarad gyda'r Cyngor, ffoniwch 01545 570881

e-bostiwch: [gt@ceredigion.gov.uk](mailto:gt@ceredigion.gov.uk)

neu gallwch alw mewn i un o swyddfeydd y  
Cyngor



Hoffwn siarad â chi cyn y 12<sup>fed</sup> o Dachwedd 2019

## Annex 6: Live Caravan Count System

Auto-pan

<input type="checkbox"/> Table <input checked="" type="checkbox"/> Map		Name	Local Authority	Caravans	Residential	Transit	Authorised	Updated	Actions
		Plwmp 2021 (August)	Ceredigion	6	0	0	✘	16/08/2021	Actions
		Plwmp 2021 (July count)	Ceredigion	0	0	0	✘	13/07/2021	Actions
		Plwmp 2021	Ceredigion	0	0	0	✘	24/05/2021	Actions
		Plwmp 2019	Ceredigion	8	0	0	✘	08/12/2020	Actions
		Plwmp	Ceredigion	13	0	0	✘	03/12/2018	Actions
		Lampeter Rookery Car Park	Ceredigion	6	0	0	✘	08/10/2018	Actions
		Penweddig Playing Fields	Ceredigion	11	0	0	✘	28/08/2018	Actions
		Coedmore Cardigan	Ceredigion	2	0	0	✘	06/10/2017	Actions
		Parc Teifi	Ceredigion	11	0	0	✘	26/07/2017	Actions
		Cardigan, Quay Street Car Park	Ceredigion	8	0	0	✘	18/07/2017	Actions
		Llandysul Business Park	Ceredigion	16	0	0	✘	18/07/2017	Actions
		Llangybi	Ceredigion	2	0	0	✘	08/02/2017	Actions
		Furnace	Ceredigion	1	0	0	✘	08/02/2017	Actions
		Croes y Llan	Ceredigion	1	0	0	✘	08/02/2017	Actions
		Coedmore	Ceredigion	1	0	0	✘	08/02/2017	Actions
		Llangybi layby	Ceredigion	1	0	0	✘	08/02/2017	Actions
		Llangybi common	Ceredigion	1	0	0	✘	08/02/2017	Actions
		Cardigan	Ceredigion	2	0	0	✘	26/09/2016	Actions

**Disclaimer :** The Caravan Count System should not be used to track the movements of individuals or households from place to place. Using the system in this way could be a breach of the Human Rights Act 1998 or Data Protection Act 1998. The Welsh Government accepts no liability for personally identifiable information inputted on the system. Users should be aware that their data is accessible by all other Local Authorities and Police forces in Wales. Other public bodies or organisations may be added in time but this will not be done without consultation with all existing users.

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