



Monmouthshire Replacement Local Development Plan

2018-2033

Gypsy and Traveller Site Allocation Background Paper

October 2024



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Gypsy and Traveller Site Allocation

1. Introduction

- 1.1. This paper is one of a series produced by Monmouthshire County Council (MCC) as part of the evidence base for the Replacement Local Development Plan (RLDP) which covers the period 2018 – 2033. The purpose of this paper is to provide the background to the Gypsy and Traveller allocation identified under Strategic Policy S9 – Gypsy and Travellers. Most of the background information relevant to this paper is provided on the Council's website and within political reports relating to the Gypsy and Traveller site identification process and is therefore not repeated here but links to the relevant webpage/political report is provided here for ease of reference. The Council's overarching Gypsy and Travellers Website pages can be accessed via: <https://www.monmouthshire.gov.uk/housing/gypsy-and-travellers/>

2. Policy Context

The Housing (Wales) Act 2014

- 2.1. Welsh Government and The Housing (Wales) Act 2014 require the Council to undertake a Gypsy, Roma and Traveller Assessment every five years. They must be subject to consultation and submitted to Welsh Ministers for approval. If that Assessment identifies a need, the Council has a duty to meet that need by facilitating the required pitch provision.

Planning Policy Wales 12 (PPW12) – February 2024

- 2.2. In relation to Gypsies and Travellers, Planning Policy Wales (PPW) advises at paragraph 4.2.36 that 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.

Welsh Government Circular 005/2018 Planning for Gypsy, Traveller and Showpeople Sites

- 2.3. The circular provides guidance on the planning aspects of identifying sustainable sites for Gypsies and Travellers. It notes at paragraph 38 of the circular that 'in deciding where to provide for Gypsy and Traveller sites, planning authorities must first consider sustainable locations within or adjacent to existing settlement boundaries with access to local services e.g. education settings, health services and shops.' Paragraph 39 adds that Sites in the countryside, away from existing settlements, can be considered for Gypsy and Traveller sites if there is a lack of suitable sustainable locations within or adjacent to existing settlement boundaries. In assessing the suitability of such sites, local authorities should be realistic about the availability, or likely availability, of alternatives to the car in accessing local services. Over rigid application of national or development plan policies that seek a reduction in car borne travel in order to effectively block proposals for any Gypsy and Traveller Site in a countryside location would be inappropriate. Sites should be considered in context and in relation to the local infrastructure, population size and density to ensure they are in proportion to local settled communities.'

Welsh Government Guidance – Designing Gypsy and Traveller Sites

- 2.4. This is a guide to Local Authorities in providing appropriate services at reasonable cost for Gypsies and Travellers living on residential sites in Wales. It contains practical guidance to assist Local Authorities to ensure their sites are fit-for-purpose. It covers site design elements including site location, layout, site facilities, site safety and consultation arrangements.

Development Plans Manual, Edition 3 2020

- 2.5. The Development Plans Manual (DPM) sets out practical guidance on how to prepare, monitor and revise a development plan and the evidence required to support it. In relation to Gypsy and Traveller Provision the DPM notes that LPAs must ensure the Gypsy and Traveller Accommodation Assessment (GTAA) is up to date and identifies a need for the entire plan period. This work will need to be completed, in addition to the provision of appropriate site allocations (where relevant) prior to the statutory deposit stage. LPAs must ensure the GTAA has had formal sign off by the relevant Welsh Minister. The status of the GTAA supporting the Plan must be clear.
- 2.6. The RLDP must be clear of the results of the GTAA in terms of the total and type of need over the plan period and the required timescales for meeting the need in line with the evidence. Where there is a need for site allocations, LPAs should include a specific policy identifying the Gypsy and Traveller allocation(s) making clear the location and total number of pitches to be accommodated.

3. Monmouthshire's Gypsy and Traveller Accommodation Assessment

- 3.1. The Council's most recent Gypsy and Traveller Accommodation Assessment (GTAA) was completed in 2021 and was agreed by Welsh Government in June 2024. In summary the conclusions are a need for 13 pitches for families already living within Monmouthshire. This need is broken down as follows:
- An unmet need of nine pitches under the assessment period 2020 to 2025.
 - Beyond 2025, a further unmet need of four pitches over the remaining length of the RLDP (2026 – 2033) to accommodate family growth as children become adults and require their own pitch, giving a total need of thirteen pitches until the end of the Plan period.
 - There is no need for an allocation for travelling show people or circus people.
 - The GTAA did not identify a need to provide a transit site and given the cross-border movement associated with families passing through Local Authorities, this topic is best addressed via the regional Strategic Development Plan.
- 3.2. The DPM notes that the Plan should be clear if the situation has changed since the GTAA was published. Of the thirteen pitches needed, two pitches have been granted planning permission for a family that was part of the GTAA. This reduced the pitch requirement to eleven. The Planning Committee decision on 16th July 2024 to approve a further four pitches at Llancayo, reduces the overall pitch requirement further to seven.
- 3.3. Appendix 1 summarises the latest position in relation to the findings of the GTAA.

4. Identification of the RLDP Site Allocation

- 4.1. Over the last two years the Council has been undertaking a process to identify appropriate sites to address the unmet need for Gypsy and Traveller accommodation. The Council has reviewed and evaluated all of the Council's 1,500 assets to meet the identified pitch need. An overview of the site identification process undertaken, and criteria used is provided in **Appendix 2**, which included engagement with elected Members through a series of member workshops and Scrutiny Committees, to share requirements, obtain views/comments about the process and evaluation criteria and update on progress. Details of the political reporting process can be found on the Council's website at:
<https://www.monmouthshire.gov.uk/housing/gypsy-and-travellers/gypsy-and-traveller-assessments-faqs/>
- 4.2. The core of the site identification process was a five-staged exercise to sift out/remove unsuitable land using the site evaluation criteria, the aim being to identify a short-list of land with potential suitability for development as Gypsy and Traveller pitch provision, which would then be consulted upon.
- 4.3. This staged exercise to sift out unsuitable assets has been recorded and evidenced in a document, referred to as the RAG document (a traffic light system of red, amber and green to colour code evaluation findings and provide a more visual indication/overview). The RAG assessment process can be viewed in 21st August 2024 Cabinet Report – Appendix 3
[Copy of 240717 Appendix 3 Gypsy Traveller site search post Cabinet inc. comments on Bradbury Oak.pdf \(monmouthshire.gov.uk\)](#)
- 4.4. A shortlist of sites was recommended to Cabinet on [26th July 2023](#), however the decision was deferred to enable officers to undertake further work as three of the identified sites were considered unsuitable.
- 4.5. Over summer 2023, officers:
 - Reviewed the RAG document;
 - Reviewed the Council owned candidate sites put forward in the RLDP process;
 - Invited the public to put potential land forward for consideration; and
 - Continued to seek to address Gypsy, Roma and Traveller need wherever possible on existing private sites, subject to necessary permission.
- 4.6. The findings of this research were reported to Cabinet on 4th October 2023. It was agreed to start a public consultation exercise on three sites (see Section 5 below) as well as including any suitable sites brought forward through the public call for sites, that the owner is willing to sell or lease long term to the Council.
- 4.7. The Cabinet decision was subject to a Call-in request which was considered by Place Scrutiny on 23rd October 2023 and referred to County Council on 26th October 2023. Council agreed to proceed with the consultation on the three identified sites discussed in Section 5 below.

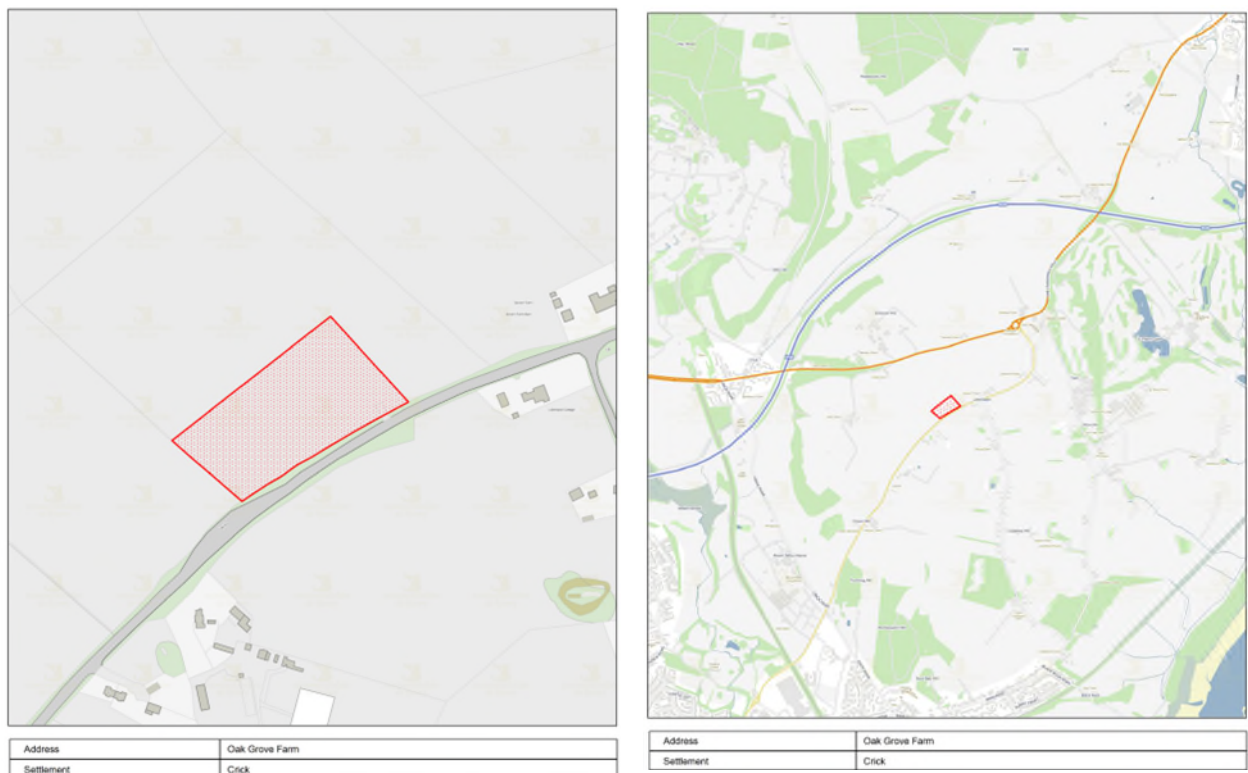
5. Proposed Gypsy and Traveller Sites Subject to Consultation

5.1. Details of the three identified sites subject to consultation are as follows:

Oak Grove Farm, Crick (up to six pitches)

- Rural
- Situated on the B4245 approximately a mile from the edge of Caldicot
- The land forms part of the Council's County Farms Estate and is occupied via an agricultural tenancy. It is anticipated this tenancy would need to be amended should the site be supported for this use.
- Land currently in use for agriculture.

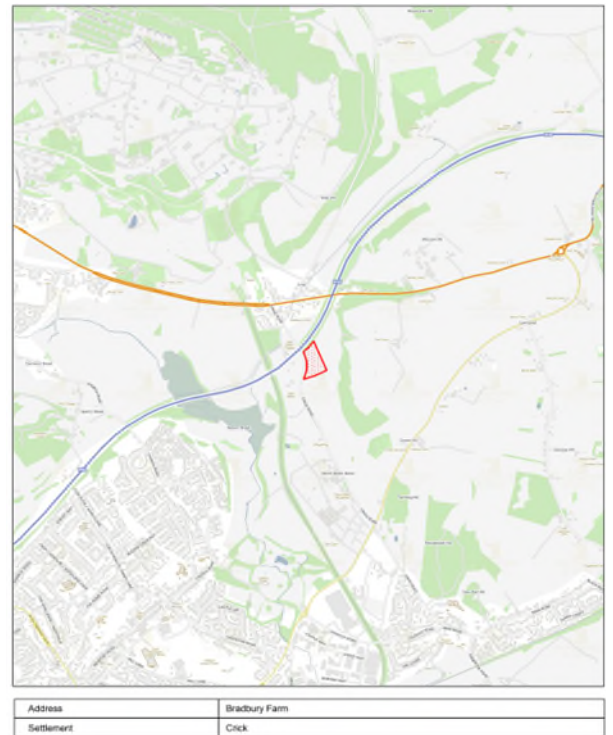
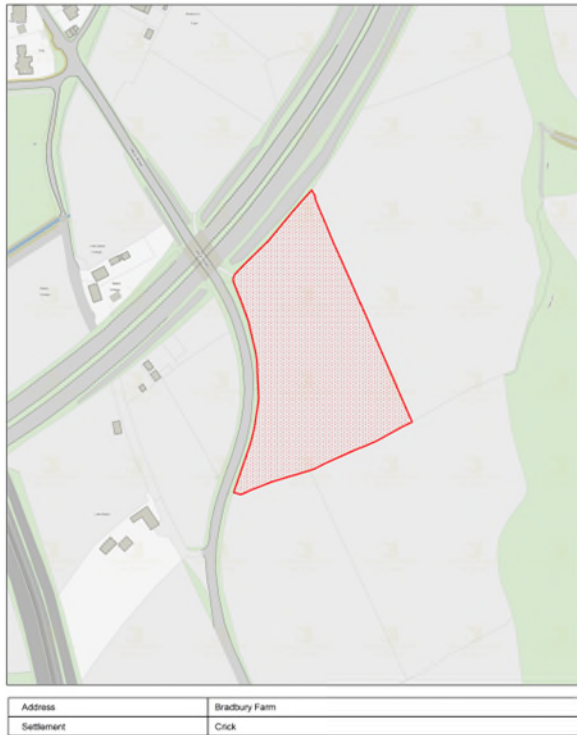
Figure 1: Oak Grove Farm, Crick (indicative boundary)



Bradbury Farm, Crick (up to six pitches)

- Rural
- Situated directly off Crick Road
- The land forms part of the Council's County Farms Estate and is occupied via an agricultural tenancy. It is anticipated this tenancy would need to be amended should the site be supported for this use.
- M48 to the north elevation of the land
- Hedgerow and fencing to east, west and south elevation

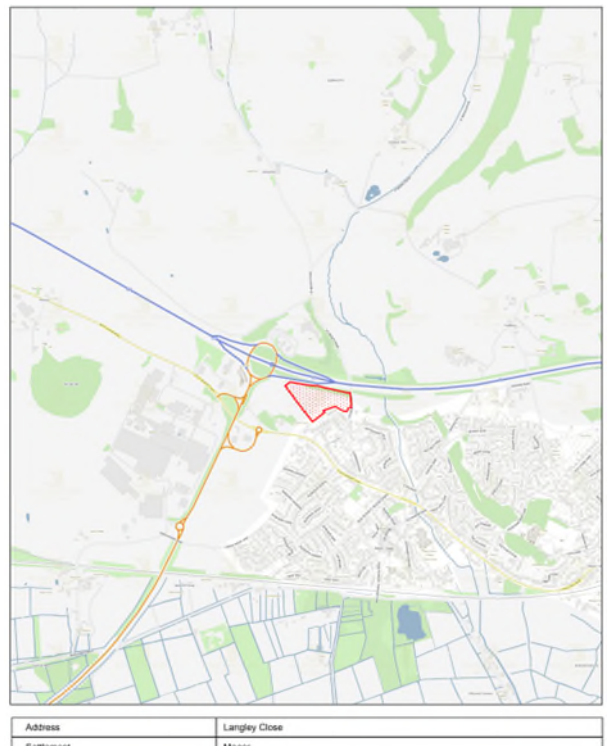
Figure 2: Bradbury Farm, Crick (indicative boundary)



Langley Close, Magor (up to six pitches)

- Urban
- Access off St Brides Road
- The land forms part of the Council's County Farms Estate and is occupied via a grazing license. It is anticipated this licence would need to be terminated/amended should the site be supported for this use.
- Residential properties adjoining the southern boundary. M4 to the north, open land to the east and west.
- Tree belt around the site.

Figure 3: Langley Close, Magor (indicative boundary)



The Consultation

- 5.2. The Council held a six-week public consultation period on the three proposed sites between November and December 2023. Grasshopper, a specialist and independent community engagement agency were appointed to undertake the agreed public consultation on behalf of the Council. It included three drop-in events, a feedback questionnaire and website information. The level of participation and engagement was significant with over 400 individual responses received from local residents and other stakeholders. The detailed findings and analysis of feedback and views from the public consultation can be found in the 21st August 2024 Cabinet Report – Appendix 5 ([240611 Appendix 5 G T Consultation Report Final.pdf](https://monmouthshire.gov.uk/240611-Appendix-5-G-T-Consultation-Report-Final.pdf) (monmouthshire.gov.uk))

Site Investigation Surveys

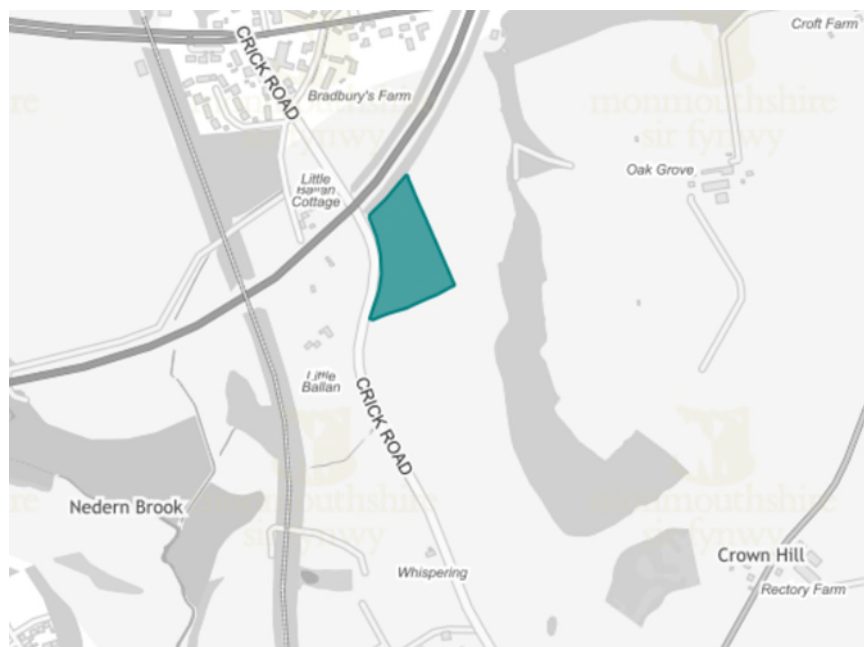
- 5.3. Specialist advisors were also appointed to undertake Noise, Land Contamination (except Oakgrove as recommended by Environmental Health), Air Quality (except Oakgrove as recommended by Environmental Health), Transport and Ecology site investigations surveys, the findings of which have been reviewed by the Council's Environmental Health, Highways and Ecology Teams. The 21st August Cabinet Report – Appendix 6 and 7 provide further details:

[Agenda item - MEETING GYPSY AND TRAVELLER PITCH NEEDS - SITE IDENTIFICATION PROPOSAL - Modern Council](#) (monmouthshire.gov.uk)

6. The Preferred Site

- 6.1. Following consideration of the consultation responses and outcome of the site investigations, Cabinet at its meeting of 21st August 2024 recommended to approve the use of Bradbury Farm, Crick for inclusion in the Deposit RLDP as a Gypsy and Traveller site allocation for 7 pitches.
- 6.2. In line with this recommendation, Strategic Policy S9 – Gypsy and Travellers allocates land at Bradbury Farm, Crick for 7 pitches to accommodate unmet Gypsy and Traveller accommodation needs identified in the latest Gypsy and Traveller Accommodation Assessment.

Figure 4: Deposit RLDP Allocation Boundary



Appendix 1 – Gypsy and Traveller Need Summary

Type	2020 – 2025	2026 - 2033	Total Need over RLDP Plan Period	Need Met Since Publication of GTAA	Outstanding Need	Allocation Required in RLDP?
Residential	9 pitches	4 pitches	13 pitches	6 pitches met through two separate planning applications (one for 2 pitches and second for 4 pitches).	7 pitches	Allocation made at Bradbury Farm, Crick for 7 pitches to meet the remaining need.
Travelling Show People	0	0	0	0	0	No allocation required.
Transit Site	0	0	0	0	0	No allocation required. To be considered on a regional basis in collaboration with neighbouring local authorities.
Total Pitches RLDP Plan Period	9 pitches	4 pitches	13 pitches	6 pitches	7 residential pitches	

Appendix 2: Gypsy and Traveller Site Identification Process

Date	Details
6 th October 2018	Note to Members of the former Adults Select Committee on proposal to establish Workshops.
October 2018	Officer work commences on considering approach to identifying land for Gypsy & Traveller pitch provision, including MCC assets.
26 th October 2018	Members Workshop to acquire views of Members – Introduction to Legal Duty to meet Gypsy & Traveller pitch needs and update on housing requirement for the Gypsy & Traveller Accommodation Assessment 2020-25 and to 2033 of the Replacement LDP. [No slides produced].
29 th March 2019	Members Workshop to acquire views of Members on the proposed methodology for sifting MCC owned land. Focus was on Gypsy & Traveller site Planning Criteria.
4 th June 2019	Member visit through Adults Select Committee to Torfaen County Borough Council Gypsy & Traveller site, Shepherds Hill, Pontypool.
10 th October 2019	Email to former Adults Select Committee Members asking for comments on draft advert targeting Gypsy & Traveller community inviting to participate in Gypsy & Traveller Assessment.
27 th November 2019	All Members and Officers Awareness Training by Travelling Ahead, Gypsy & Traveller Advocate.
10 th December 2020	Report to Joint Select Committee: Adult and Economy & Development Selects – Scrutinise draft Gypsy & Traveller Assessment report and findings. (Public Pack)Agenda Document for Joint Select Committee, 10/12/2020 10:00 (monmouthshire.gov.uk)
6 th January 2021	Report to Cabinet – Approve and adopt Gypsy & Traveller Accommodation Assessment report. (Public Pack)Agenda Document for Cabinet, 06/01/2021 14:00 (monmouthshire.gov.uk)
March 2021	Stage 1- Asset Review by Estates to start identifying land with potential for use as Gypsy & Traveller site(s)

21st September 2021	Report to Adults Select – Scrutinise Site identification update. (Public Pack) Agenda Document for Adults Select Committee, 21/09/2021 10:00 (monmouthshire.gov.uk)
September 2021	Site Evaluation Commences: Stage 1 – Completed Asset Review by Estates: • Regard given to Welsh Government Site Design Guidance 2015 • Approximately 1500 council assets have been reviewed and considered • Sites removed to date through Estates: [Asset is a MCC property; Cemetery Land; Allocations in the existing adopted LDP; tree planting; Woodland; Covered by a ground lease; Council Car Park; Footpath/road] Stage 2 – Sites removed due to the following: • Site is less than 500sqm; Equipped Children’s Play Area; Playing Fields (Pitch); County Farm Holdings; Allocations in the existing adopted LDP/ RLDP promotion sites; Known unfavourable topography; C1 & C2 Flood Risk – known sites in flood risk removed; Sites with any uncertain inputs have been carried forward to the next stage for further assessment • Approximately 70 sites remained from 1500 sites Stage 3 – to assess for flood risk against and as per updated TAN 15. Land removed due to: • Sites wholly or mostly in Zones 2 & 3 of updated TAN15 flood risk maps (sea and river) • Sites where boundary could potentially be amended to remove site out of flood risk kept on list • Surface water flood risk highlighted for further assessment • Any constraints identified in Stage 1 & 2 if picked up at Stage 3. • Approximately 50 sites from 1500 remaining. Also removed: • Brecon Beacons National Park Plan • Within and adjacent to Conservation Areas and/or Historic Park & Garden • Enclosed/surrounded by built environment privacy and amenity / placemaking • National Ecological designations e.g. SSSI

20th July 2022	Report to Adults Select – to include Gypsy & Site identification into the Committees work programme, participate in officer-led workshops and to scrutinise the proposed methodology for identifying and evaluating Council owned land for the purpose of providing a Gypsy & Traveller site. Also to invite Travelling Ahead-Gypsy, Roma and Traveller Advice & Advocacy Service to support the Council with the agreed approach. (Public Pack)Agenda Document for People Scrutiny Committee, 20/07/2022 10:00 (monmouthshire.gov.uk)
8 th August 2022	Letter to Gypsy & Traveller community who contributed to Gypsy & Traveller Assessment, inviting to participate in site identification process.
29th September 2022	All Member Workshop to acquire views of members – reminder of legal duties; consider ongoing methodology findings; planning implications; proposed approach including involving of Travelling Ahead.
October 2022	Stage 4 – Land/Site Evaluation Criteria Developed • Site area • Ability to provide utility infrastructure • Flood Zone (updated TAN15 flood risk maps) • Within or adjoining a settlement boundary • Greenfield/brownfield • Surround by built development • Potential for expansion • Within BBNP or AONB • Within green wedge or potential greenbelt • Within phosphates catchment area • Adopted LDP DES2 allocation • DES2 in review • Within/adjacent to Conservation Area or Historic Parks & Garden • Within Archeologically Sensitive Area • Permanency • Ecological Designation on whole or part of site (SSSI, SINC, SAC, RAMSAR, national/local nature reserve) • Proximity to ecological designation • Landscape Sensitivity (as recorded in the Landscape Sensitivity Study) • Mineral safeguarding area • Proximity to potential ‘bad neighbours’ e.g. dual carriageways, trunk roads, motorway, railway, industrial estates) • Contamination (as recorded on Monmaps)

	• School proximity • Medical facility proximity • Proximity to other amenities • Public transport proximity and frequency • Proximity to Historical Designation (inc Listed Buildings and Con Areas) • Topography • Access
October 2022	Stage 5 Further evaluation of 17 remaining site through officer RAG and visits. Reduced to 11 with parts of 2 sites at Dancing Hill being merged to form an amended Dancing Hill site, leaving 9 sites for internal consultation and discussion with the Gypsy & Traveller community.
1st November 2022	Email to individual Members with a site in their ward in respect of forthcoming Members Workshop.
3rd November 2022	All Member Workshop to acquire views – consider proposed 9 pieces of land should remain in the process for continued evaluation.
10th November 2023	Stage 5 – Continue evaluating 9 remaining sites. Internal services contacted requested to provide feedback on 9 sites.
30th January 2023	All Member and officer Gypsy & Traveller Awareness Training by Travelling Ahead.
31st January 2023	Updated RAG following receipt of feedback from internal consultees. Officer Meeting to consider feedback on 9 sites.
13th June 2023	Informal Cabinet – informally discuss next steps.
23rd June 2023	Email to individual Members with a site in their ward in respect of forthcoming Members Workshop.
27th June 2023	Email to all Members – background papers for 4th July 2023 Members Workshop.
4th July 2023	All Member Workshop to acquire views – proposal to consult on four locations, undertake further investigations in respect of one location and four to be removed from the process.

7th July 2023	Environmental Health briefing on sites x 5 and Land Contamination, Noise and Air Quality Assessments.
14th July 2023	All Member site visits x 9. Feedback received to further inform RAG and suitability.
19th July 2023	Report to People Scrutiny – Proposal to consult on four sites and investigative work on a fifth site. (Public Pack)Agenda Document for People Scrutiny Committee, 19/07/2023 10:00 (monmouthshire.gov.uk)
26th July 2023	Report to Cabinet – Approve 4 sites for consultation and one for further investigative work. Decision made to defer consultation on the selection of potential sites for Gypsy and Traveller accommodation to allow more time for consideration – no sites have been confirmed for consultation at this stage. Three sites removed from process as determined unsuitable.
28th July 2023	Preparations to commission land contamination, air and noise assessments for Magor with Undy sites to continue to assess their potential suitability and to inform future consultation.
August 2023	• Review of 17 site shortlist to a) ensure nothing was ruled out that shouldn't have been and b) ensure wording is consistent and robust. • Review of 9 site shortlist to ensure information is consistent and robust • Assessment of MCC RLDP candidate sites – there are 5 sites submitted for residential development, one for tourism, two for solar farms and one for a mix of employment and solar farm. All 9 will be assessed for suitability • Public call for any sites closing 23rd August 2023. • Potential review of all other (non-MCC) RLDP candidate sites (approx.250) • Continue to seek to address need wherever possible on existing private sites, subject to the necessary permissions e.g. facilitate self-serving.
4th October 2023	Cabinet – the meeting ratified the proposal made at Cabinet on 26th July 2023 to remove Manson Heights, Monmouth' Garrow Road, Mitchel Troy; Rocklea, Mitchel Troy; Dancing Hill West, Magor and to put forward two Council owned RLDP candidate sites, Bradbury Farm and Oakgrove. The Cabinet also agreed to the commencement of a public consultation exercise for the potential to provision of up to 6 pitches

	each at Bradbury Farm, Crick; Oakgrove Farm, Portskewett and Langley Close, Magor, whilst also continuing to support households wanting to self-serve. In addition to the Cabinet recommendations and in the context of the comments made by The Place Scrutiny Committee on 19th July 2023, it was considered appropriate to commission site evaluation surveys to further help inform site suitability. External Specialists were appointed to undertake the following site surveys for each site: • Noise assessment • Land contamination assessment (not including Oakgrove on the advice of Environmental Health) • Air quality assessment (not including Oakgrove on the advice of Environmental Health) • Transport assessment • Ecology assessment
November to December 2023	6-week public consultation- co-ordinated on behalf of the Council by Grasshopper, communications agency to acquire feedback about. The suitability of Langley Close, Magor; Bradbury Farm, Crick and Oakgrove, Portskewett.
May 2024	Officer consideration and analysis completed of Grasshopper public consultation and findings.
June 2024	Officer consideration and analysis of findings from completed and finalised site surveys together with internal comments and recommendations from Environmental Health, Highways and Ecology Teams.
July 2024	Report to Place Scrutiny Committee- 24th July 2024 (Agenda for Place Scrutiny Committee on Wednesday, 24th July, 2024, 4.30 pm- Modern Council (monmouthshire.gov.uk))
21st August 2024	Cabinet recommended to remove Langley Close, Magor and Oakgrove Farm, Portskewett from the site identification process based on evidence from the public consultation and site investigation surveys, and due to the pitch requirement reducing to. To approve the use of land at Bradbury Farm, Crick for the proposed Gypsy and Traveller site, for development and inclusion in the Deposit RLDP. Final decision subject to the outcome of ongoing indicative concept design work, and the findings and recommendations of further site evaluation survey work in respect of noise mitigation. That Bradbury Farm, then forms part of a detailed public consultation on the Deposit RLDP, where residents will be able to comment further on the proposal to allocate this land to meet the Council's Gypsy and

	Traveller housing need Agenda for Cabinet on Wednesday, 21st August, 2024, 4.30 pm- Modern Council (monmouthshire.gov.uk)
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