

# Gypsy and Traveller Accommodation Assessment 2021

## Well-being Impact Assessment Report

This report summarises the likely impact of the proposal on the social, economic, environmental and cultural well-being of Denbighshire, Wales and the world.

Assessment Number:	896
Brief description:	The Council is required under the Housing Act (Wales) 2014 section 101, to assess the accommodation needs of Gypsies, Roma and Travellers . The report provides an assessment of need to meet this duty. The Council is required to update the GTAA every five years. New assessments were originally required to be submitted to Welsh Government by Feb 2021 but this has been extended to Feb 2022 in the light of Covid restrictions which impact on the methodology required to complete the assessment. The assessment and report are now in draft final form.
Date Completed:	Version: 0
Completed by:	
Responsible Service:	Planning & Public Protection
Localities affected by the proposal:	Whole County,
Who will be affected by the proposal?	Members of the Gypsy, Roma and Traveller community in need of residential or transit accommodation. Residents of Denbighshire Elected Members.
Was this impact assessment completed as a group?	Yes

# IMPACT ASSESSMENT SUMMARY AND CONCLUSION

Before we look in detail at the contribution and impact of the proposal, it is important to consider how the proposal is applying the sustainable development principle. This means that we must act "in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs."

## Score for the sustainability of the approach

 ( 3 out of 4 stars ) Actual score : 27 / 36.

## Summary for each Sustainable Development principle

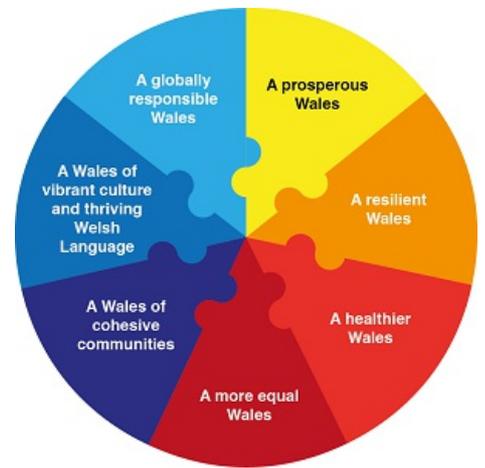
<b>Long term</b>	Project is limited to a needs assessment at this stage and only identifies need. It does not propose mechanisms for meeting the identified need. Future stages will involve the consideration of physical assets, climate change etc but at this stage the report only assesses existing and predicted future growth.
<b>Prevention</b>	Through the identification of any housing needs for members of the Gypsy, Roma and Traveller Community the Council can actively take steps to address any need. This project is limited to the assessment of need. Any future actions to address the need will seek to ensure that the accommodation needs of members of the Gypsy, Roma and Traveller Community are appropriately met and seek to reduce the occurrence of unauthorised encampments which may be in ecologically sensitive locations.
<b>Integration</b>	An up to date Gypsy and Traveller Accommodation Assessment is a required piece of evidence for the progression of an LDP. Not having this assessment completed and approved by Council and Welsh Government will prevent the replacement LDP from progressing to Deposit, Examination and Adoption. This would leave the Council vulnerable to speculative development.
<b>Collaboration</b>	The assessment process has been progressed jointly with Conwy CBC to Welsh Government Guidance to achieve benefits of collaboration. Denbighshire has received an individual needs assessment report for the county area. The Council has a duty under the Housing Act (Wales) 2014 to carry out this work.
<b>Involvement</b>	The assessment is a factual piece of work not subject to public consultation. There has been consultation with members of the Gypsy, Roma and Traveller Community and with representative organisations. Face to face interviews were offered as set out in WG Guidance. Criticism of previous assessments included insufficient engagement with members of the Gypsy, Roma and Traveller Community, additional steps have been taken to increase involvement in this assessment. A Task and Finish Group has overseen the consultation and engagement with the Gypsy, Roma and Traveller Community and that the study is compliant with the WG methodology.

## Summary of impact

### Well-being Goals

A prosperous Denbighshire	Neutral
A resilient Denbighshire	Positive
A healthier Denbighshire	Positive

A more equal Denbighshire	Positive
A Denbighshire of cohesive communities	Neutral
A Denbighshire of vibrant culture and thriving Welsh language	Positive
A globally responsible Denbighshire	Positive



## Main conclusions

The overall impact of the proposal to carry out the Gypsy and Traveller Accommodation Assessment (GTAA) is positive. The assessment is required by law and forms a key piece of evidence for the replacement LDP. Gypsies and Travellers are a group often subject to discrimination and they have protected characteristics recognised in law. The GTAA will form an assessment and identify any need for culturally appropriate accommodation for members of the Gypsy and Traveller community currently residing within Denbighshire or travelling through the County. A project management approach is being taken to progressing the study with regular briefings for elected members and senior officers. A member led Task and Finish group was established to oversee the consultation with members of the Gypsy and Traveller community to ensure that their views are understood and taken into account. The GTAA establishes need for culturally appropriate accommodation but does not make recommendations on site specific locations to address that need.

## Evidence to support the Well-being Impact Assessment

- We have consulted published research or guides that inform us about the likely impact of the proposal
- We have involved an expert / consulted a group who represent those who may be affected by the proposal
- We have engaged with people who will be affected by the proposal

# THE LIKELY IMPACT ON DENBIGHSHIRE, WALES AND THE WORLD

## A prosperous Denbighshire

<b>Overall Impact</b>	Neutral
<b>Justification for impact</b>	The project was limited to an assessment of the accommodation needs of members of the Gypsy, Roma and Traveller community. The assessment identifies any accommodation needs but the strategy for meeting any needs will form a separate piece of work. Having a clear picture of accommodation needs will be beneficial as having stable and suitable accommodation provides a secure base from which to learn, seek employment and access health care.
<b>Further actions required</b>	Awareness raising must be carefully managed to ensure that consistent messages are used across Council services and in dealing with comments from the public. The Council should take a clear stance on how it will respond to racist comments and take appropriate action. The benefits of having a clear picture of accommodation needs needs to be communicated to all groups.

### Positive impacts identified:

<b>A low carbon society</b>	In conducting telephone, rather than face to face interviews there have been carbon savings. Although all households were offered the opportunity to have a face to face interview, preference for telephone interviews were given in all cases.
<b>Quality communications, infrastructure and transport</b>	Having a clear and agreed assessment of accommodation needs of members of the Gypsy, Roma and Traveller Community for Denbighshire will enable the Council to plan effectively.
<b>Economic development</b>	Members of the Gypsy, Roma and Traveller Community may be at greater socio-economic disadvantage when compared to the general population. having a clear and agreed assessment of their needs may assist in reducing this inequality.
<b>Quality skills for the long term</b>	<p>Conducting the assessment and progressing it through approval by the Council and Welsh Government may provide opportunities for awareness raising and training both across the Council and the wider public.</p> <p>There has been considerable experience gained in the project management of a sensitive study which must be delivered to a limited timescale.</p>
<b>Quality jobs for the long term</b>	The assessment required project management support which has generated income for this service that is reliant on fees.
<b>Childcare</b>	There are no anticipated impacts on childcare arising from the assessment.

### Negative impacts identified:

<b>A low carbon society</b>	No impacts identified.
<b>Quality communications, infrastructure and transport</b>	No impacts identified.
<b>Economic development</b>	No impacts identified.

<b>Quality skills for the long term</b>	The assessment interviews were carried out by consultants who are experienced in this type of work. There were limited opportunities for shared learning around the technical side of the assessment but there was learning around the management of a sensitive project. Awareness raising can generate negative comments linked to stereotypes of people with protected characteristics.
<b>Quality jobs for the long term</b>	No impacts identified.
<b>Childcare</b>	There are no anticipated impacts on childcare arising from the assessment.

## A resilient Denbighshire

<b>Overall Impact</b>	Positive
<b>Justification for impact</b>	The GTAA is a report that identifies the accommodation needs of Gypsy, Roma and Traveller Families in Denbighshire. The GTAA only identifies the quantum of any need, it does not propose sites to address any identified need. The GTAA identifies need and indicates broadly where within the County the need exists. The identification of any sites to meet this need will form a separate piece of work. Completion of a GTAA is a requirement under the Housing Act (Wales) 2014. The GTAA is also a required part of the evidence base for the replacement LDP and must be completed and approved before the replacement LDP can be progressed to Examination and adoption. A new LDP is required to provide an up to date development framework that contributes to a more resilient Denbighshire.
<b>Further actions required</b>	The GTAA is a report that identifies the accommodation needs of Gypsy, Roma and Traveller Families in Denbighshire. The GTAA only identifies the quantum of any need, it does not propose sites to address any identified need. A project management approach is being used to try to ensure that the progression and approval of the GTAA is completed in a timely fashion. Elected members and senior officers have been regularly briefed and updated on the project prior to it starting and this has continued throughout it's development.

### Positive impacts identified:

<b>Biodiversity and the natural environment</b>	The GTAA is a required part of the evidence base for the replacement LDP. Having an up to date and approved GTAA will enable the replacement LDP to progress towards adoption. This will ensure that development happens in a planned manner on sites where the impacts on biodiversity and the natural environment are minimised. The replacement LDP will also contain up to date policies that will seek to protect the natural environment.
<b>Biodiversity in the built environment</b>	The GTAA is a required part of the evidence base for the replacement LDP. Having an up to date and approved GTAA will enable the replacement LDP to progress towards adoption. This will ensure that development happens in a planned manner on sites where the impacts on the built environment are minimised. The replacement LDP will also contain up to date policies that will seek to protect the built environment.
<b>Reducing waste, reusing and recycling</b>	The GTAA is a required part of the evidence base for the replacement LDP. Having an up to date and approved GTAA will enable the replacement LDP to progress towards adoption. The replacement LDP will contain up to date policies that will seek to reduce and manage waste.

<b>Reduced energy/fuel consumption</b>	The GTAA is a required part of the evidence base for the replacement LDP. Having an up to date and approved GTAA will enable the replacement LDP to progress towards adoption. The replacement LDP will contain up to date policies that will seek to reduce energy consumption through increased use of renewable technologies, requirements for the installation of renewable technology in new developments and the drive towards being a net zero carbon Council.
<b>People's awareness of the environment and biodiversity</b>	No impacts identified.
<b>Flood risk management</b>	The GTAA is a required part of the evidence base for the replacement LDP. Having an up to date and approved GTAA will enable the replacement LDP to progress towards adoption. The replacement LDP will reflect the latest flood risk policies and mapping to ensure that any developments are not subject to flood risk and that the impacts of climate change are fully considered.

### Negative impacts identified:

<b>Biodiversity and the natural environment</b>	Any delay in approving the GTAA will impact on the progress of the replacement LDP as it is a required part of the evidence base. Denbighshire may be subject to speculative development on non allocated sites due to not having an up to date LDP and an identified land supply for housing, employment, retail etc.
<b>Biodiversity in the built environment</b>	Any delay in approving the GTAA will impact on the progress of the replacement LDP as it is a required part of the evidence base. Denbighshire may be subject to speculative development on non allocated sites due to not having an up to date LDP and an identified land supply for housing, employment, retail etc.
<b>Reducing waste, reusing and recycling</b>	Any delay in approving the GTAA will impact on the progress of the replacement LDP as it is a required part of the evidence base. If there is no up to date LDP then the Council will be reliant on old policies that do not fully reflect the aspiration for carbon reduction and addressing the environmental emergency declared.
<b>Reduced energy/fuel consumption</b>	No impacts identified.
<b>People's awareness of the environment and biodiversity</b>	No impacts identified.
<b>Flood risk management</b>	Any delay in approving the GTAA will impact on the progress of the replacement LDP as it is a required part of the evidence base. If there is no up to date LDP then the Council will be reliant on old policies that do not fully reflect the latest position regarding flood risk policy and mapping.

## A healthier Denbighshire

<b>Overall Impact</b>	Positive
<b>Justification for impact</b>	Members of the Gypsy, Roma and Traveller community have protected characteristics and need culturally appropriate accommodation to support their emotional and mental well-being. Completing a GTAA identifies families in need. Establishing contact with Gypsy, Roma and Traveller families may enable other support services to build improved relationships and improve the health outcomes for members of the Gypsy, Roma and Traveller Community.

<b>Further actions required</b>	Throughout the GTAA process the scope of the assessment has been made clear in that it relates to an assessment of need and that the study will not make any recommendations on sites. This can help to manage the expectations of members of the Gypsy, Roma and Traveller Community.
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### Positive impacts identified:

<b>A social and physical environment that encourage and support health and well-being</b>	The identification of Gypsy, Roma and Traveller families in need of culturally appropriate accommodation in Denbighshire may assist other services in better engaging with families to support their health and well-being. As a highly marginalised group in society with protected characteristics, improved engagement may enable services to be better delivered through improved communication and the building of relationships.
<b>Access to good quality, healthy food</b>	No impacts identified
<b>People's emotional and mental well-being</b>	The GTAA is restricted to the identification of housing need for Gypsy, Roma and Traveller families. In carrying out the assessment the Council is acknowledging that people with protected characteristics may have different accommodation needs that are culturally appropriate to them. The acknowledgement of this need may improve the well-being of Gypsy, Roma and Traveller families if they feel that their needs are better understood.
<b>Access to healthcare</b>	The identification of Gypsy, Roma and Traveller families in need of culturally appropriate accommodation in Denbighshire may assist other services in better engaging with families to support their health and well-being. As a highly marginalised group in society with protected characteristics, improved engagement may enable services to be better delivered through improved communication and the building of relationships.
<b>Participation in leisure opportunities</b>	No impacts identified

### Negative impacts identified:

<b>A social and physical environment that encourage and support health and well-being</b>	No impacts identified.
<b>Access to good quality, healthy food</b>	No impacts identified
<b>People's emotional and mental well-being</b>	Approving the GTAA will raise the profile of the issue and may increase concern amongst both the settled and Gypsy, Roma and Traveller communities about future stages.
<b>Access to healthcare</b>	No impacts identified.
<b>Participation in leisure opportunities</b>	No impacts identified

## A more equal Denbighshire

<b>Overall Impact</b>	Positive
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<b>Justification for impact</b>	Members of the Gypsy, Roma and Traveller community have protected characteristics under the Equalities Act and frequently suffer from discrimination. Completing and approving the GTAA which will identify any accommodation needs is a step towards reducing the inequality in housing opportunity suffered by members of the Gypsy, Roma and Traveller Community. Improved health and education outcomes might also be a positive impact in the longer term.
<b>Further actions required</b>	Regular briefings for elected members to pass on to their communities to dispel common misconceptions and reduce discrimination should it arise. Emphasise that the GTAA does not make recommendations on sites to meet the need identified. The Council can ensure that the project aligns with its Public Sector Equality Duty under the Equalities Act (2010).

**Positive impacts identified:**

<b>Improving the well-being of people with protected characteristics. The nine protected characteristics are: age; disability; gender reassignment; marriage or civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation</b>	Members of the Gypsy, Roma and Traveller community have protected characteristics under the Equalities Act. Completing and approving the GTAA which will identify any accommodation needs is a step towards reducing the inequality in housing opportunity suffered by members of the Gypsy, Roma and Traveller Community.
<b>People who suffer discrimination or disadvantage</b>	Members of the Gypsy, Roma and Traveller community have protected characteristics under the Equalities Act and frequently suffer from discrimination. Completing and approving the GTAA which will identify any accommodation needs is a step towards reducing the inequality in housing opportunity suffered by members of the Gypsy, Roma and Traveller Community.
<b>People affected by socio-economic disadvantage and unequal outcomes</b>	Members of the Gypsy, Roma and Traveller community have protected characteristics under the Equalities Act and frequently suffer from discrimination and socio-economic disadvantage. Completing and approving the GTAA which will identify any accommodation needs is a step towards reducing the inequality in housing opportunity suffered by members of the Gypsy, Roma and Traveller community.
<b>Areas affected by socio-economic disadvantage</b>	The GTAA identifies families in need of culturally appropriate accommodation. The GTAA does not make any recommendations as to sites but the Council will have information on the location of families in any need. This can be mapped against areas of known socio-economic disadvantage.

**Negative impacts identified:**

<b>Improving the well-being of people with protected characteristics. The nine protected characteristics are: age; disability; gender reassignment; marriage or civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation</b>	Carrying out the GTAA may raise the profile of members of the Gypsy, Roma and Traveller community currently resident in Denbighshire which may increase their vulnerability as a group with protected characteristics.
<b>People who suffer discrimination or disadvantage</b>	Approving the GTAA may raise the profile of members of the Gypsy and Traveller community currently resident in Denbighshire which may increase their vulnerability as a group with protected characteristics.
<b>People affected by socio-economic disadvantage and unequal outcomes</b>	Approving the GTAA may raise the profile of members of the Gypsy, Roma and Traveller community currently resident in Denbighshire which may increase their vulnerability as a group with protected characteristics who are also subject to socio-economic disadvantage..
<b>Areas affected by socio-economic disadvantage</b>	No impacts identified.

## A Denbighshire of cohesive communities

<b>Overall Impact</b>	Neutral
<b>Justification for impact</b>	The impact is considered to be neutral as there are positive impacts in terms of increased consultation with a group with protected characteristics but that raising the profile of members of the Gypsy, Roma and Traveller Community may lead to division. Lack of consultation with the Gypsy, Roma and Traveller Community was highlighted by Scrutiny Committee as a weakness in the current GTAA. This has been addressed via a Task & Finish group of elected members who have overseen and approved all of the engagement for the assessment.
<b>Further actions required</b>	Individual families have been interviewed as part of the preparation and consultation of the assessment. Their identities and address details will not be disclosed although general geographical area(s) of need are highlighted in the report . A Task and finish group was established to ensure that the consultation and engagement was robust. A detailed communication and engagement strategy was developed to ensure there was early engagement with key stakeholders to raise awareness of the project. Officers will continue to support understanding through reviewing good practice and lessons learnt from across the UK.

### Positive impacts identified:

<b>Safe communities and individuals</b>	Members of the Gypsy, Roma and Traveller Community currently living in culturally inappropriate accommodation may be subject to discrimination
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<b>Community participation and resilience</b>	The Welsh Government methodology for preparing the GTAA which must be followed includes a requirement for face to face interviews with members of the Gypsy, Roma and Traveller community. This ensures that members of the community who may not normally be reached by consultations have an opportunity to input into the assessment which directly concerns them. All households identified through extensive engagement expressed a preference for a telephone interview where they agreed to participate in the assessment.
<b>The attractiveness of the area</b>	The GTAA itself only assesses housing need and has no impact on the physical environment at this stage. The GTAA is a required part of the evidence base for the LDP and without it, the LDP cannot progress. The replacement LDP will contain policies for environmental protection and enhancement, and safeguard green space.
<b>Connected communities</b>	No impacts identified
<b>Rural resilience</b>	No impacts identified

### Negative impacts identified:

<b>Safe communities and individuals</b>	Approving the GTAA may raise awareness within wider communities that members of the Gypsy and Traveller community are resident within an area. This may lead to an increase in discrimination and the perception that a particular group in society are receiving more assistance than others.
<b>Community participation and resilience</b>	This Needs Assessment is targeting a traditionally hard to reach group which even with additional efforts taken to engage may not wish to participate in this process.
<b>The attractiveness of the area</b>	The GTAA itself only assesses housing need and will have no impact on the physical environment at this stage. The GTAA is a required part of the evidence base for the LDP and without it, the LDP cannot progress. With no replacement LDP there will be no up to date policies for environmental protection and enhancement, and the safeguarding of green space.
<b>Connected communities</b>	No impacts identified
<b>Rural resilience</b>	No impacts identified

## A Denbighshire of vibrant culture and thriving Welsh language

<b>Overall Impact</b>	Positive
<b>Justification for impact</b>	The GTAA assesses the need for culturally appropriate accommodation of members of the Gypsy, Roma and Traveller community. This is a vital aspect of Gypsy, Roma and Traveller culture and the assessment will inform the Council of the needs of the community in order to sustain their heritage and culture. The GTAA is also a required piece of evidence for the replacement LDP. Having an up to date LDP will ensure that the latest policies to protect and enhance the Welsh language and our cultural heritage will be in force.
<b>Further actions required</b>	A project management approach was taken to the GTAA to ensure that it was completed in a timely fashion. There are regular briefings for elected Members and senior officers to ensure that there is clarity over the requirement to produce a GTAA; the methodology that must be followed and the reporting and approval process. The need to have the GTAA in place in order to progress the LDP is also being clearly communicated.

### Positive impacts identified:

<b>People using Welsh</b>	Some members of the Gypsy, Roma and Traveller Community will be Welsh speakers. The GTAA is a required part of the evidence base for the replacement LDP and must be completed and approved before the replacement LDP can be progressed to Examination and adoption. Having an up to date LDP will ensure that appropriate policies for the protection and enhancement of the Welsh language are included in the plan.
<b>Promoting the Welsh language</b>	Some members of the Gypsy, Roma and Traveller Community will be Welsh speakers. The GTAA is a required part of the evidence base for the replacement LDP and must be completed and approved before the replacement LDP can be progressed to Examination and adoption. Having an up to date LDP will ensure that appropriate policies for the protection and enhancement of the Welsh language are included in the plan.
<b>Culture and heritage</b>	Some members of the Gypsy, Roma and Traveller community have protected characteristics linked to their cultural identity. The GTAA will assess the needs of members of this community in terms of culturally appropriate accommodation.

### Negative impacts identified:

<b>People using Welsh</b>	Any delay to the completion and approval of the GTAA will impact on the LDP preparation. The replacement LDP cannot be approved without an up to date GTAA. If the replacement LDP is not progressed then the policies used to determine planning proposals will be increasingly out of date and opportunities may be lost to encourage the use of the Welsh language.
<b>Promoting the Welsh language</b>	Any delay to the completion and approval of the GTAA will impact on the LDP preparation. The replacement LDP cannot be approved without an up to date GTAA. If the replacement LDP is not progressed then the policies used to determine planning proposals will be increasingly out of date and opportunities may be lost to promote the use of the Welsh language.
<b>Culture and heritage</b>	No impacts identified

## A globally responsible Denbighshire

<b>Overall Impact</b>	Positive
<b>Justification for impact</b>	A jointly commissioned study has reduced costs and the need to travel to conduct interviews. Improved communication and links between members of the Gypsy, Roma and Traveller community and service providers may lead to improved outcomes in terms of health and education.
<b>Further actions required</b>	

### Positive impacts identified:

<b>Local, national, international supply chains</b>	The study has been jointly commissioned with Conwy CBC to reduce the impact of travel for interviews and consultations. Each authority will receive it's own detailed report and evidence of need.
<b>Human rights</b>	Members of the Gypsy, Roma and Traveller community have protected characteristics under the Equalities Act. The GTAA is a requirement under the Housing Act (Wales) 2014 to make an assessment of the need for culturally appropriate accommodation for members of the Gypsy, Roma and Traveller community in Denbighshire.
<b>Broader service provision in the local area or the region</b>	The GTAA requires face to face interviews and consultation with members of the Gypsy, Roma and Traveller community. Establishing links with families currently resident in the County or passing through may assist other services concerned with health, education etc to build relationships with the families to better deliver services and improve outcomes across a range of partner organisations.

<b>Reducing climate change</b>	None identified
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**Negative impacts identified:**

<b>Local, national, international supply chains</b>	None identified
<b>Human rights</b>	None identified
<b>Broader service provision in the local area or the region</b>	None identified
<b>Reducing climate change</b>	None identified