



## Table of Contents

<b>1. Introduction</b> .....	<b>3</b>
Background to this Report .....	3
<b>2. Options for Delivering Additional Residential Pitches</b> .....	<b>4</b>
Background to Designing Gypsy Traveller Sites .....	4
Views of Gypsy Traveller Families on Potential Pitch Provision .....	5
Locations Identified for Need .....	6
Size of Site required .....	8
Locations With Potential to Provide Additional Pitches .....	11
Option 1: Providing an entirely new Site .....	11
Option 2: Expanding an existing Site .....	11
<b>3. Conclusions</b> .....	<b>13</b>

# 1. Introduction

1.1 The purpose of this document is to consider different options for delivering additional pitches to accommodate Gypsy Travellers in Pembrokeshire and make recommendations on the most appropriate locations for these pitches, for inclusion in the Deposit Local Development Plan. A pitch is an area of land to accommodate a single family unit, with one or more caravans placed on it.

1.2 The Local Development Plan (LDP) will replace the Joint Unitary Development Plan for Pembrokeshire as the land-use plan for the area of Pembrokeshire excluding the National Park. A separate LDP has been produced by the National Park Authority for its own planning area.

## ***Background to this Report***

1.3 Pembrokeshire County Council is required to consider the needs of Gypsy Travellers in developing housing and planning policy by the Planning and Compulsory Purchase Act 2004 and the Housing Act 2004. To meet these requirements the Authority commissioned and conducted a Gypsy Traveller Accommodation Needs Assessment which was published in 2010 (GTANA). This report was based on a questionnaire of Gypsy Travellers and also drew on secondary data. This GTANA identified the following key findings:

- Mixed levels of satisfaction from residents of authorised local authority sites
- Low levels of travelling
- That the majority of respondents had been resident at pitches for more than five years
- Good levels of engagement in education and healthcare
- No need identified amongst those Gypsy Travellers surveyed in Pembrokeshire for additional residential or transit pitches in neighbouring authorities: Pembrokeshire Coast National Park Authority, Ceredigion County Council or Carmarthenshire County Council
- A need for 33 additional residential pitches over the next 5 years in Pembrokeshire County Council's planning area.

1.4 Welsh Assembly Government Circular 30/2007 requires local authorities to identify appropriate sites in Development Plans for Gypsy Traveller accommodation. It is therefore necessary for the Local Development Plan to identify how the required additional 33 residential pitches will be provided in the Local Development Plan for Pembrokeshire.

1.5 The Pembrokeshire Local Development Plan will run from its adoption until 2021. This is longer than the five year period for which the GTANA

identified need. Predicting the accommodation needs of the Gypsy Traveller Community in Pembrokeshire over a period of more than 5 years is very difficult, especially where the population is so small. For example a young child is unlikely to know where they would like to live or in what type of accommodation they would like to live in 10 years time. For this reason, it is appropriate that the LDP makes provision only for the identified need for the next five year period. The LDP will be reviewed every four years, which provides an opportunity to make provision for any additional need identified in new GTANAs.

1.6 This report, refers to existing Gypsy Traveller Sites in Pembrokeshire, for information the table below indicates the location of existing sites:

Site Name	Nearest Town	Area of Pembrokeshire
Catshole (Castle) Quarry	Pembroke	South West Pembrokeshire
Under the Hills	Haverfordwest	Mid Pembrokeshire
Withybush	Haverfordwest	Mid Pembrokeshire
Kingsmoor Common	Begelly and Kilgetty	South East Pembrokeshire

## 2. Options for Delivering Additional Residential Pitches

### ***Background to Designing Gypsy Traveller Sites***

- 2.1 Guidance from the Welsh Assembly Government on how to deliver appropriate residential pitches for Gypsy Travellers is set out in the Welsh Assembly Government: Good Practice Guide in Designing Gypsy Traveller Sites in Wales (Good Practice Guide). Some information on site sustainability is also contained within the Welsh Assembly Government Circular 30/2007. The broad principles which should be considered when providing new pitches or sites are set out below:
- 2.2 **Size of site** – the Good Practice Guide suggests that the ideal size of a site should generally be no more than 12 pitches, though it also states that *‘local authorities may consider it necessary to be flexible by allowing more pitches on a site when taking into account local circumstances and the current level of need.’*(Para 3.1.1). It states that *“sites bigger than 20 pitches should only be developed where there is a clear and demonstrable need to act against such a presumption and where consultation and engagement has taken place with all stakeholders.*
- 2.3 **Site location** – the Good Practice Guide states that when considering where to locate a new site the first locations considered should be those with access to local services such as shops, doctors and schools, and that local authorities should avoid locating sites next or near to hazards. It also

states that local authorities should consider carefully the current working patterns of Gypsy Travellers and aim to find locations well located for this and in close proximity to transport links. The guidance recommends that local authorities consider the fact that many Gypsy Travellers live in extended family groups when considering site location.

2.4 Welsh Assembly Government Circular 30/2007 establishes that in terms of considering **site sustainability** the following issues should be considered:

- opportunities for growth within family units;
- the promotion of peaceful and integrated co-existence between the site and the local community;
- the wider benefits of easier access to GP and other health services;
- access to utilities including waste recovery and disposal services;
- access for emergency vehicles;
- children attending school on a regular basis;
- also other educational issues such as space e.g. for touring or static play bus, homework club, teaching base for older children and adults,
- suitable safe play areas;
- contribute to a network of transit stops at intervals that reduce the need for long-distance travelling
- possible environmental damage caused by unauthorised encampment;
- not locating sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans and;
- regard for areas designated as being of international or national
- importance for biodiversity

### ***Views of Gypsy Traveller Families on Potential Pitch Provision***

2.5 The GTANA was informed by a questionnaire which asked Gypsy Traveller families about their accommodation needs. In a number of instances, respondents added comments to the form in relation to their views of how sites should be developed. These additional comments are listed below:

#### **2.6 Kingsmoor Common:**

*“Would like own slab on same site but needs to be made bigger – use field at side.”*

*“Would like site to be extended onto adjoining land so could have own plot.”*

*“Space for additional living units if site was extended. Need more plots, lots of families need pitches wait for slabs is much too long. Site needs to be extended.”*

*“Not enough site for additional living units. Serious overcrowding of pitches. Young families can’t get pitch and don’t want to go into housing. Site needs to be extended or new site in area.”*

*“Could add additional living units onto adjoining land. Youngsters have nowhere to move to as no slabs available, this is causing real hardship for young families. Site needs to be extended onto land next door for young families from site.”*

## **2.7 Under the Hills**

One respondent thought that there was space to add additional living units to site. Another thought there was not.

## **2.8 Castle Quarry**

*“Enough space to add additional living units to site if use Middle Quarry.”*

## **2.9 Withybush**

Neither of the two people who answered the question thought that there was enough space to add additional living units to the current site.

2.10 These comments need to be taken into consideration by the Authority when considering how to provide the 33 units required in the Local Development Plan.

## ***Locations Identified for Need***

2.11 The GTANA identified a need for 33 additional residential units in Pembrokeshire (section 7 of report). This total consists of a number of elements including considerations of those households who would like to transfer from pitches to houses, those who would like to transfer from housing to pitches and those forecast to migrate from outside the County. The main element of need however arises from those who are currently experiencing overcrowding on existing pitches or have family members currently sharing pitches who would like to have their own pitch. Overcrowding, including those family members who would like their own pitch, accounts for 26 of the additional pitches needed. This element of the need can be broken down by area, giving an idea of the geographical split of this part of the need.

2.12 Table 7.1 of the GTANA shows the distribution across Pembrokeshire of the 26 households who require additional pitches due to overcrowding. This table is reproduced here:

**Table 7.1 from GTANA**

Location of respondent	Respondent future movement						Future demand (dependent family member/s of respondent)	Preferred location for dependent	
	House to Pitch	Pitch to House	Site to Site	House to House	Not move	N/A		LA Site	House/ Bungalow
Haverfordwest (Mid Pembs)							13	<b>9</b>	4
Under the Hills		1			5		2	1	1
Withybush			2		4		0	0	0
House	3		1	2	3		8	7	1
Not Specified		1	3		1		3	1	2
Pembroke/Pembroke Dock (SW Pembs)							11	<b>4</b>	7
Catshole Quarry		1	1		1		0	0	0
Waterloo					2		4	4	0
House					1		1	0	1
Not Specified		2			1		6	0	6
Kilgetty/Begelly (SE Pembs)							13	<b>13</b>	0
Kingsmoor Common			5		9	1	13	13	0
<b>Total</b>	<b>3</b>	<b>5</b>	<b>12</b>	<b>2</b>	<b>27</b>	<b>1</b>	<b>37</b>	<b>26</b>	<b>11</b>

2.13 The table identifying need from the existing sites in relation to overcrowding or future demand from dependent family members, shows a need of the following:

- Haverfordwest Area – 9 pitches
- Pembroke/Pembroke Dock Area – 4 pitches
- Kilgetty/ Begelly Area - 13 pitches

Total: 26 pitches

2.14 The overall identified need for Pembrokeshire is for 33 pitches, with 7 pitches for which no specific geographical area has been identified (this is allowing for need from non-respondents, current families on unauthorised encampments and potential movement from outside the area.) It seems reasonable to distribute these according to the broad geographical need identified from the survey. This split would result in, the following pitch requirement for different areas:

**Haverfordwest area - 11.45 pitches**

**Pembroke/Pembroke Dock area – 5.05 pitches**

**Kilgetty/Begelly area – 16.5 pitches**

It is also worth however considering where unauthorised encampments have taken place over the last five years, in line with guidance in the WAG circular. The GTANA shows that these unauthorised encampments have predominantly been located in the South of Pembrokeshire, with two in the Pembroke/Pembroke Dock area and two in the Kilgetty area. A fifth unauthorised encampment was located outside Milford Haven. This evidence therefore broadly indicates that new pitches are required in the South East (Kilgetty) and South West (Pembroke/Pembroke Dock) areas of Pembrokeshire. If an adjustment were made to reflect the locations of unauthorised encampments a mix of the following would be sought:

**Haverfordwest area – 10 pitches**

**Pembroke/ Pembroke Dock area – 8 pitches**

**Kilgetty/Begelly area – 15 pitches**

### ***Size of Site required***

2.15 The Model Standards 2008 for Caravan Sites in Wales suggests a gap of 3 metres should be observed between a caravan, trailer, chalet or park home and the pitch boundary, and that there must be a 6 metre separation from any other caravan.

2.16 The legal definition of a caravan is set out in the Caravan Sites and Control of Development Act 1960 and the Caravan Sites Act 1968 see table below.

#### **Legal Definition of a Caravan**

Section 29 (1) of the Caravan Sites and Control of Development Act 1960 (“The 1960 Act”) a caravan is defined as “... 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 so designed or adapted 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.”

This definition has been modified by Section 13 (1) of the Caravan Sites Act 1968 (“The 1968 Act”), which deals with twin-unit caravans. Section 13 (1) provides that: “A structure designed or adapted for human habitation which:

a) Is composed of not more than two 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), shall not be treated as not being (or not having been) a caravan within the meaning of Part 1 of the Caravan Sites and Control of Development Act 1960 by reason only that it cannot lawfully be moved on a highway when assembled.”

Section 13(2) of the 1968 Act prescribes the following maximum dimensions for “twinunit caravans”

(a) length (exclusive of any drawbar); 60 feet (18.288 metres);

(b) width: 20 feet (6.096 metres);

(c) overall height of living accommodation (measured internally from the floor at the lowest level to the ceiling at the highest level): 10 feet (3.048 metres).

2.17 The GTANA asked those questioned how many caravans their family unit had on a pitch. The vast majority of those questioned – 24 out of 29 respondents - had one caravan, static home or van per pitch (see paragraph 6.7 of GTANA). Three respondents had two vans and one respondent had three vans. Although the responses received indicate that the typical requirement is for one caravan, the Authority should consider ensuring flexibility for changing family circumstances and therefore ensure that a mixture of different size pitches are available on sites and that some pitches are larger than others with the potential for two or three caravans to be located.

2.18 An example of the different areas required for a pitch, depending on the number of caravans required is shown in Appendix 1. Typical pitch areas to comply with good practice guidance are: 291 sq metres (for a single caravan), 583.2 square metres (for two caravans) and 874.8 square metres (for three caravans) (See Appendix 1). These measurements assume that all caravans have a gap of 6 metres between them and a 3 metre buffer from the edge of the pitch. It also assumes that all caravans are the maximum legal size for a caravan.

The following table demonstrates the area required to accommodate additional pitches, depending on the number of caravans placed on pitches:

Location	Number of Pitches	Area (if 1 caravan per pitch) sq metres	Area (if 2 caravans per pitch) sq metres	Area (if 3 caravans per pitch) sq metres	Range of area required (sq metres)
Haverfordwest	10	2,910 (0.29 ha)	5,832 (0.58 ha)	8,748 (0.87 ha)	0.29 – 0.87 ha
Pembroke/Pembroke Dock	8	2,327 (0.23 ha)	4,665 (0.46 ha)	6,998 (0.69 ha)	0.23 – 0.69 ha
Kilgetty/Begelly	15	4,365 (0.43 ha)	8,748 (0.87 ha)	1,3122 (1.31 ha)	0.43 – 1.31 ha

2.19 When identifying areas suitable for additional pitches, these calculations should be considered. Space will also need to be provided for access roads and facilities such as washrooms or play areas, and the likelihood that extensions will comprise of a mixture of pitch sizes.

## **Locations With Potential to Provide Additional Pitches**

2.20 There is clearly a need to provide additional pitches in the Haverfordwest area, the Pembroke/Pembroke Dock area and the Kilgetty area. There are two options for providing pitches in these areas, one is to provide a new site and the second option is to extend an existing site. Both of these are assessed below, through a SWOT analysis and Sustainability Appraisal.

### **Option 1: Providing an entirely new Site**

2.21 This SWOT analysis considers the option of providing an entirely new site:

<b>STRENGTHS</b> <ul style="list-style-type: none"><li>• Would comply with suggested Good Practice Standard of having sites of no more than 12 pitches in size.</li></ul>	<b>WEAKNESSES</b> <ul style="list-style-type: none"><li>• Does not allow growth of family units on existing sites or maintain existing communities.</li></ul>
<b>OPPORTUNITIES</b> <ul style="list-style-type: none"><li>• Opportunity to locate site in close proximity to services.</li><li>• Opportunity to design site in conjunction with community.</li></ul>	<b>THREATS</b> <ul style="list-style-type: none"><li>• No Candidate Sites suggesting land for entirely new sites were submitted.</li><li>• Potential timetable delays in delivering sites due to time to identify site and purchase land.</li></ul>

### **Option 2: Expanding an existing Site**

2.22 This SWOT analysis considers the option of expanding an existing site:

<b>STRENGTHS</b> <ul style="list-style-type: none"><li>• Would allow growth of family units on existing sites and maintain existing communities.</li><li>• All of the existing sites have good access to services.</li></ul>	<b>WEAKNESSES</b> <ul style="list-style-type: none"><li>• On most sites it would increase the number of pitches to above the recommended Good Practice Standard of no more than 12 pitches per site.</li></ul>
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OPPORTUNITIES	THREATS
<ul style="list-style-type: none"> <li>• Opportunity to design site extension in conjunction with community.</li> <li>• With the exception of Under the Hills (Haverfordwest), the Authority already owns land adjacent to each site, which means that additional pitches could be delivered more quickly.</li> </ul>	

2.23 In terms of a SWOT analysis, the option to extend existing sites appears stronger, with fewer threats and more strengths (including maintaining existing family structures and communities). Further assessment of the two options was conducted by using the Sustainability Appraisal Framework of the LDP (see Appendix 2).

2.24 In terms of the Sustainability Appraisal, both options meet a number of important objectives, particularly the objective of providing high quality housing including affordable housing for local needs. There are a number of areas where the likely relationship is unclear and would be location or site dependent, particularly for the objectives linked to the environment. In terms of objectives linked to community cohesion, the option to extend existing sites has a stronger direct relationship.

### 3. Conclusions

#### *Conclusions*

3.1 There is a need to provide the following number of additional pitches across Pembrokeshire:

Haverfordwest	10
Pembroke/Pembroke Dock	8
Kilgetty/ Begelly	15

3.2 Of the options to deliver additional pitches, the option to extend existing sites is the most deliverable and the option that appears the strongest in terms of the Sustainability Appraisal.

3.3 Appendix 3 includes an assessment of the potential to extend and deliver pitches adjacent to existing sites within the LDP. Following this assessment the following extension sites are allocated in the LDP:

<b>Site</b>	<b>Indicative number of pitches</b>
Withybush (Haverfordwest)	10
Catshole (Castle) Quarry (Pembroke)	8
Kingsmoor Common, (Kilgetty)	15

