

Development Management  
Pembrokeshire County Council  
County Hall  
Haverfordwest  
SA61 1TP

Pembrokeshire  
County Council

18 DEC 2024

Digital Mail Room

Date: 10<sup>th</sup> December 2024

Dear Officers,

**RE: Local Development Plan 2 Deposit Plan Consultation – Proposed Policy GN 24 Gypsy and Traveller Site Allocations, specifically relating to the site at Land East of Withybush Gypsy and Traveller site.**

I write to you wishing to respond in relation to the LDP 2 Deposit Plan, specifically in regard to the proposed Policy GN 24 Gypsy and Traveller Site Allocations. We write to you as the residents of the identified site labelled Withybush Gypsy and Traveller Site within your LDP 2 Deposit Plan. We have lived and maintained the site for the last 40 years, with three family units currently residing within the existing pitches.

We wish for the policy relating to allowing an additional 20 new pitches at the Withybush Gypsy and Traveller Site to be reconsidered, and this allocation as it is currently proposed, to be removed from the plan due to the following reasons.

Firstly, we wish for you to understand our integration into the local community since our move onto the site. We describe ourselves as a family-based site, with our family remaining on the site consistently. We are not gypsy or travellers, as we do not follow the tradition of moving off site to travel for work and then returning to the site. We are a separate society and therefore, mixing the two groups would upset the existing harmonious relationship we have within the site and the surrounding localities. We, as a minority group, raised this concern to the Local Council, about having travellers placed next to our homes. We have fears for our security and are concerned we may see an increase in petty crime and theft. The occupants of the Withybush site have created a settled and private community, with life following that of the wider Pembrokeshire community. We are also employed by the local Authority and other businesses around Pembrokeshire.

By allowing and encouraging the extension of our site and 20 additional pitches, we feel this will create large scale disruption to our lives and those living around us. An expanded site would not integrate well with the existing community. We currently have respectable relationships with the surrounding communities of Rudbaxton and Crundale and we do not wish to hinder these relationships.

Secondly, we wish to point out why we believe that the current deposit plan is unsound and how the plan should be changed to make it sound. We believe that the plan fails two tests of soundness: is the plan appropriate and will the plan deliver.

#### Is the plan appropriate?

The Deposit plan Policy GN 24 identifies a total net gain of 55 pitches across the LDP area, with the Land East of Withybush Gypsy and Traveller site, suitable for an indicative net gain of 20 pitches. This would allow in principle a further 20 pitches within the site and able to be occupied by anyone within the Gypsy and Traveller community, with the right permissions and consents.

The evidence base that was used to set this policy was the Gypsy Traveller Accommodation Assessment 2019 which was approved 24<sup>th</sup> May 2024. Within this, the conclusions highlight that there are 39 pitches required until 2033, with 18 required (46%) due to existing family growth. It also highlights that all of these pitches can be met with live planning permissions, i.e. those granted after 2019.

In light of the above evidence, there is no demand by the Gypsy and Traveller communities to be sited on the proposed pitches within the Withybush site. The requirements for additional pitches within the plan period can already be comfortably accommodated by live planning permissions and the policy seeks to

provide a net gain of 55 pitches, when only a maximum need of 39 have been identified, with nearly half of those being from family expansion. Therefore, the plan is not appropriate in light of the appropriate evidence base and provides an over provision of sites within the plan period.

To make the plan sound we suggest that the policy be altered to remove the indicative gain of 20 pitches from the Land East of Withybush site and instead highlight that this site is only suitable for the expansion of existing family units as the site is well established and any further intake of outside family units could upset the harmony of the site and create wider reaching impacts on the local area.

#### Will the plan deliver?

We dispute that the Council have vacant possession of the land identified within the plan, which would be available to develop the additional 20 pitches. The field has been maintained and used by the Withybush Site families for over 40 years. We would not be willing to allow the further development of the proposed 20 sites to anyone other than our own families. Therefore, this plan would lead those looking for a suitable site to believe there is forthcoming capacity on a site which would be unavailable for development. Therefore, the proposed 20 pitches within GN 24 would not be readily available to be delivered within the plan period.

To make this element of the plan sound we suggest the rewording of the policy to read "there is capacity for additional pitches to serve the families already living on the site".

Overall, the current policy is not sound. It does not consider the requirements of the evidence base and puts forward a very generic plan, not taking into account the breakdown of the requirements shown in the evidence base, which is mainly for the expansion of existing family units.

It also fails to recognise that the land is occupied, lawfully. The land is unavailable for additional sites, when the tenants of the site are not willing to give up there tenure to bring forward the proposed pitches.

Finally, it would better serve the community, if available non-private sites are highlighted for new pitches, with existing private sites highlighted for existing family expansion only.

Yours Sincerely

