Pembrokeshire County Council

Local Development Plan (2017-2033)

Session 4

Tuesday 17th November 2026, 10:00am

Other housing policies and Gypsy and Traveller accommodation

Hearing Statement

Appendix A is the same document for each Session: It consists of:
Part 1: Policy Edits
Part 2: Minor Edits
Part 3: Proposals Maps Edits
Part 4: Other Edits

October 2026

PEMBROKESHIRE COUNTY COUNCIL

Session/Matter 4 – Other housing policies and Gypsy and Traveller accommodation Tuesday 17th November 2026, 10:00am	
Issue: Whether the Plan sets out an appropriate framework for the provision of Gypsy and Traveller accommodation and specific housing types including related controls, consistent with national planning policy?	
Specialist and supported accommodation	
1. Is Policy GN 15 sufficiently clear? Are the policy and supporting text consistent with, and based on, up-to-date evidence? a. How would the 'local community' needs be determined within the first paragraph? Is this a reasonable basis upon which to assess needs?	MD
Closed **LPA Response:** 1. Policy GN 15 is considered to be sufficiently clear with the benefit of the Focussed Changes already proposed (FC5.GN15.01, FC5.GN15.02, FC5.GN15.03, FC5.GN15.04). In terms of evidence used to support the Policy the evidence sources are referenced throughout the reasoned justification. The evidence sources need to be updated and clarified now that the LHMA 2023 is published, further changes are needed to ensure that GN 15 and its reasoned justification reflect the newer document – and likewise that other references to the LHMA in LDP 2 relate to the LHMA 2023 document. Please see Appendix A Part 1 Policy Edits for proposed Matters Arising Changes [c]. 1a. The reasoned justification identifies the evidence base relied upon with regard to what is meant by the term 'local community'. Local Housing Market Assessments methodologies and supporting evidence for Local Housing Market Assessments are updated from time to time and therefore the context for 'local community' can change. Normally it relates to the local community or town council area. The Council's current Supplementary Planning Guidance[1] on affordable housing shows how affordable housing needs are considered which relies on a politically acceptable approach of focusing on town and community council areas. It should be noted though that there is a restriction on the number of Housing Market Areas that can be identified under the Welsh Government's newest methodology which does reduce the Council's ability to identify need more locally as it has been able to do with earlier versions of the Local Housing Market Assessment. The Council's Housing Needs Register also provides more locally focused evidence. In terms of market housing the Council is reliant on achieving an acceptable housing layout and mix of housing types to comply with Policy GN 1 General Development Policy. Compatibility with the character of the 'the local area' is referred to in criterion 1). This would likely mean a need to focus at a settlement level or the local neighbourhood. The mix can also be influenced in terms of achieving a financially viable scheme to support the delivery of affordable housing. The Council is also proposing to produce a Residential Design Guide as supplementary planning guidance which will help inform applicants of expectations. Earlier versions of the Local Housing Market Assessment for Pembrokeshire did provide more guidance on the mix required market housing but the newest methodology by Welsh Government does not cover this aspect.	

[1] https://www.pembrokeshire.gov.uk/objview.asp?object_id=3210&language=

Criterion C in conjunction with 5.96 to 5.98 relies upon Census data and Council Tax data for the Plan area focussing on monitoring at a Plan level for triggers to identify significant change and then focussing down to a local community or town council level or even a settlement level for further analysis if needed. The preparation of an Article 4 Direction would require substantive evidence in its own right and involve significant consultation to be progressed. Criterion D's requirement for Lifetime Home Standards is Plan wide for developments for five or more residential units.	
2. Is criterion B effective? a. How would an applicant demonstrate an 'appropriate mix' of housing types, tenures and bedroom numbers? b. Given the evidence and provisions of other policies (GN20, GN21, and GN22) what are the expectations of this criterion and how would they be implemented?	MD
Closed **LPA Response:** 2. a. and b: Yes, this criterion is considered to be effective when used alongside Policy GN 20 Local Needs Affordable Housing and the housing allocation policies of the Plan. The policies are underpinned by affordable housing need which is set out in Local Housing Market Assessments and the Council's Housing Register. These evidence bases provide advice on tenures, and bedroom numbers. The LHMA also provides advice on house types, i.e., where certain standards are needed, for example wheelchair accessible requirements. Each application will however need to be considered within the context of need for the local area at that time but the policy and supporting evidence provides a sound basis to consider expectations further on individual applications. A combination of an updated Affordable Housing Supplementary Planning Guidance and a Residential Design Guide Supplementary Planning Guidance should also assist. The Affordable Housing Supplementary Planning Guidance could usefully be extended to cover specialist supported accommodation needs as well. Question 1.a answer explains the extent to which market housing provision can be influenced. The Local Development Plan also provides for allocations for Specialist and Supported Accommodation under Policy GN 23. In addition, Policy GN 22 sets out a criteria-based policy for the provision of Specialist and Supported Accommodation both within and adjoining a settlement boundary. The policy's reasoned justification refers to the 'Assessment of Specialist Housing and Accommodation Need for Older People in West Wales', November 2018 (SD24[2]) and 'Housing and accommodation needs assessment for people with learning disabilities in West Wales to 2035' (SD25[3]) as identifying the needs that the policy aims to meet. Figure 1 page 36 of the first report provides a typology of older people's housing and accommodation, ranging from moving from existing housing for example by downsizing or relocating for lower maintenance or moving to more adaptable homes or cohousing, 50+ housing and sheltered housing. These are banded in what is referred to as C3 General Needs Housing. The second part of Figure 1 refers to Specialist Housing and Care Homes which can	

[2] https://www.housinglin.org.uk/Topics/type/An-assessment-of-the-demand-for-specialist-housing-and-accommodation-for-older-people-in-Wales/
West_Wales_CP_Older_Peoples_Housing_Need_Assessment_HousingLIN-Final.pdf SD24

[3] SD25 WWCP_LD_Housing_Assessment_HousingLIN.pdf– report referred to in the RJ of Policy GN 22.

be either C3 or C2 depending on the level of care and these include extra-care, retirement villages, residential homes, nursing homes, hospitals and hospices.

The implications for provision are highlighted:

- The need to provide for a mix of housing types and tenures including providing the opportunity to downsize and include specialist provision
- If residential care is to decline then include extra care housing
- Include care ready housing, without care on site where individuals can be visited with ease
- Existing sheltered housing improved to provide better support
- Older peoples' housing schemes that are catering for people living with dementia – a housing/nursing hybrid
- Co-housing initiatives for older people
- Adaptation of existing homes.

The difficulty with planning for these needs in a more prescriptive way is understanding how they can be translated to a more local level.

At a strategic level, the Local Development Plan can provide for housing requirements where identified land is available and can be viably delivered. Here the level of affordable housing delivery is tested depending on housing market conditions etc., the identified need – Local Housing Market Assessment and what the viability testing can absorb regarding housing standards demands for example.

Policy GN 20 Local Needs Affordable Housing can provide for affordable housing requirements more generally in Market Areas.

Policy GN 15 sets out requirements at a Plan level in terms of mix, tenure and standards for housing layouts. Supplementary Planning Guidance can also set out prescriptions regarding affordable housing provision (tenure, number of bedrooms required, including key worker expectations) more explicitly.

At the more detailed planning application stage the expertise of the housing authority is also used to refine the more generic expectations given Officers' knowledge of existing provision for various types of accommodation including wheelchair accessible requirements.

Social Services are part of that assessment as well, depending on the expertise required. Affordable housing provision is normally publicly funded or cross-subsidised by the developer.

The housing authority/social services department can also secure land to provide for development types. Beyond the requirements set out in generic policies of the Plan and the housing allocations (for C3 uses) and the specialist housing allocations which is the primary focus for delivering the needs identified in Policy GN 22, the planning authority does not have sufficient evidence to specify in greater detail as to when and where further specialist housing may be required.

It can, however, use the criteria-based policies of the Plan to enable such provision as spending priorities crystalise. For example, at present The West Wales Regional Partnership Board Capital Strategy July 2023 sets out in Appendix 5 Strategic Priorities for up to 10 years.[4] For Pembrokeshire there is reference to a Fishguard Health and Wellbeing Centre which could be considered under Policy GN 29 Community Facilities. The Council is also dealing with a representation as part of this consultation regarding the potential provision of such a facility at the Maesgwynne housing allocation site in Fishguard. The Strategy advises that further scoping is needed. The redevelopment of Haverfordia House is referred to which can be accommodated within the policy framework of the Local Development Plan in particular GN 13 Residential Development. A care facility at Pembroke Dock involves the repurposing of residential units adjacent to the Community Hospital. The refurbishment of accommodation at St Ishmaels for Children and Young People is listed along with the refurbishment of property at Rock Farm. The table included in the reasoned justification of Policy GN 22 (Figure 4) refers to figures that can also be found in the document entitled: 'An assessment of the demand for specialist housing and accommodation for older people in Wales 01/01/20' (SD24 [5]). See Table 50 on page 52. Pembrokeshire estimated net demand (shortfall in units/beds) to 2035. An annexe to that report provides built examples of provision referred to in the Table and this can be used determine whether the Local Development Plan can facilitate these types of requirements. On reviewing the accommodation types likely to come forward the Plan's policy framework is considered to be sufficiently flexible to consider such proposals as they come forward.	
3. Is criterion C effective? a. How would an applicant be able to demonstrate an 'appropriate balance' of housing? How would this be applied by proposed use and/or location? b. Would it provide a clear basis for evaluating applications to change between C3 and other residential uses as referred to in para 5.95?	MD
Closed **LPA Response:** 3. & 3.a &3.b In terms of an Article 4 Direction the criterion would be effective should the need arise once the Article 4 Direction was in place. This would require substantial research to be undertaken to justify an appropriate balance and where it would be applied.	

[4] https://wwrpb.org.uk/capital-strategy/ capital programme for development Regional Partnership Board July 2023 West Wales

[5] https://www.housinglin.org.uk/Topics/type/An-assessment-of-the-demand-for-specialist-housing-and-accommodation-for-older-people-in-Wales/ SD24

In terms of achieving an appropriate balance in terms of the Housing requirements, this will be led by annual monitoring of LDP 2.

Paragraphs 5.96 to 5.98 of LDP 2 explain the approach that is intended.

In essence if 50 or more holiday or second homes are developed over the Plan area over and above the overall allowance in the housing requirement in any one monitoring year and it is considered that there is a danger that new development proposed is likely to exceed a more local Community or Town Council allowance for second and holiday homes (the overall allowance for the Plan area is an average of allowances at a Community/Town Council level) then controls are likely to be required on any similar proposed development to ensure that the housing requirement overall is not undermined by the overprovision of holiday lets and second homes going forward.

A hypothetical example might be that with the benefit of monitoring residential development for the previous annual monitoring year it is shown that 50 holiday and second homes have been constructed over and above the Plan allowance (underpinning the housing requirement). Further investigation shows that there has been a significant increase in flat developments concentrated in one seafront location in the Plan area which are all occupied as holiday or second homes. This has resulted in an exceedance in the allowance for second and holiday homes for the locality (assumptions used for community/town council area to define the Plan's Housing Requirement). This finding would be published as part of the Plan's Annual Monitoring Report. See Monitoring Indicator below.

D - Sustain resourceful communities by providing a range and mix of homes supported by key community facilities and services.	GN 15 Housing Mix, Second Homes and Short-term Holiday Lets, Space Standards and requirements for Lifetime Homes Standards	Level of second homes and holiday let completions monitored against the Plan's vacancy rate allowance	Allowance (as opposed to target) of 520 holiday lets and second homes as part of the housing land supply (33 per year) by 2033.	If the total number of second homes and/or holiday lets built is greater than or equal to 50 units above the 8.1% vacancy rate allowance anticipated.	Annual PCC Housing Survey.	Further Investigation/ Research Required to include consideration of the use of planning conditions on a case-by-case basis.

As allowed for in paragraph 5.98 when another new flat development is proposed the following year it may need to be suitably conditioned to ensure that proposals reflect the intended housing provision mix including the level of self-catering and/or second home properties vacancy rate allowance for that constituent Community/Town Council area which originally informed the Policy SP 2 Housing Requirement allowance.

3b. The extent to which any further controls could be applied could only be evidenced through the development of, and extensive consultation on, an Article 4 Direction with supporting supplementary planning guidance. The Council has no plans to progress an Article 4 Direction at present.

4. Is criterion D effective? a. Is it based on robust and up to date evidence? b. Of the housing supply, how many dwellings could potentially be built to Lifetime Homes Standard? c. What development cost assumptions have been made in the Financial Viability Report ([6]SD28 and [7]ED10) to reflect the requirement for 20% of private units to meet Lifetime Homes standards or equivalent?	MD (AB)
Closed **LPA Response:** 4. and 4.a The Policy requires under criterion D) that all new build residential developments on sites of 5 or more dwellings must provide a minimum of 20% of properties built to Lifetime Homes Standards and in addition, wheelchair user dwellings will be supported. The criterion is considered to be effective. Paragraph 4.2.13 of Planning Policy Wales advises: *Planning authorities should also identify where interventions may be required to deliver the housing supply, including for specific sites. There must be sufficient sites suitable for the full range of housing types to address the identified needs of communities, including the needs of older people and people with disabilities. In this respect, planning authorities should promote sustainable residential mixed tenure communities with 'barrier free' housing, for example built to Lifetime Homes standards to enable people to live independently and safely in their own homes for longer.* The Council has identified an ageing population as a key issue for LDP2. Alongside the trend for increasing numbers of over-65s is a trend for an increasing need for properties to be adaptable and potentially accommodate wheelchairs. The Local Housing Market Assessment 2022 (SD27[8]) identifies that there will be a significant increase in the proportion of the population with a disability between 2017 and 2033. Paragraph 6.11 of the Local Housing Market Assessment 2023 advises that '*In total 11,518 adaptable homes are required in 2036 in Pembrokeshire, of which 7,014 should be in the market sector and 4,504 in affordable accommodation. Of the 11,518 adaptable homes required, 9,957 should be in the general housing stock and 1,561 in supported accommodation.'* Paragraph 6.12 adds that *'Whilst the future requirement for Lifetime Homes has been identified, there is limited information on the number of dwellings that fulfill this criterion in Pembrokeshire and therefore there is not a detailed profile of the current stock from which to derive a net requirement. However, the Regional Housing Market Assessment for South West and Mid Wales report estimates that there are currently around 7,000 such homes that fulfill this criterion.'* Paragraph 6.13 concludes that *'Overall, the requirement for 11,518 adaptable homes implies that a notable uplift will be required to the number of homes that meet this standard currently, and that by the end of the plan period around about 18.3% of the total stock should be available that meet this criterion.'* On this basis, 20% of properties on sites of 5 or more must be built to Lifetime Homes standards. Where market properties are proposed on a site, the percentage requirement will apply to the market properties specifically	

[6] https://www.pembrokeshire.gov.uk/objview.asp?object_id=11531&language= SD28
[7] (ED10a) Financial Viability Report Addendum Feb 2026
(ED10b) Appendix A Viability Guidance Note for Wales
(ED10c) Appendix B Updated Key Site FVAs
[8] https://cms.pembrokeshire.gov.uk/objview.asp?object_id=12043&language= SD27

as Lifetime Homes standards is a requirement of Welsh Development Quality Requirements 2021[9]. Lifetime Homes standards ensure that two-storey properties have a standard wheelchair-accessible ground-floor and that the stairs are straight to potentially accommodate a stair lift without a need for a bespoke track. Bungalows built under these standards have a wider turning circle in the hall areas. Ensuring an appropriate mix of properties to meet the needs of the population is a critical element of ensuring that the Council meets the requirements of the Health and Well-being Act.

In addition, the Local Housing Market Assessment 2022 (SD27[10]) predicts that by 2036, there will be a requirement for 4.1% of the total housing stock to be wheelchair accessible and homes built to wheelchair accessible standard will be supported. Paragraph 6.14 of the LHMA 2023 (SD45[11]) advises *that 'There is also a requirement for wheelchair user dwellings. Using the same data sources but focusing specifically on those that require fully wheelchair accessible housing within the letting figures, it is possible to follow the same method to produce equivalent results that identify the future requirement for a wheelchair accessible home in Pembrokeshire in 2036.'* Subsequent paragraph 6.15 elaborates on this, saying *'In total 2,562 wheelchair user dwellings are required in 2036 in Pembrokeshire, of which 1,630 should be in the market sector and 931 in affordable accommodation. Of the 2,562 wheelchair user dwellings required, 1,974 should be in the general housing stock and 588 in supported accommodation. The Regional Housing Market Assessment for South West and Mid Wales report estimates that there are currently around 1,440 wheelchair accessible homes in the market sector with 710 in the affordable sector. This implies that the net requirement between 2020 and 2036 is for 190 new wheelchair homes in Pembrokeshire in market accommodation and 221 in affordable housing.'* Paragraph 6.16 adds that *'by the end of the plan period, around about 4.1% of the total stock should be available to meet this criterion.'*

In terms of the wheelchair accessible homes the Lifetime Homes Standard are designed to be adaptable over time and so can provide for a wide range of households. Given the smaller numbers in terms of Wheelchair Accessible housing specific requirements have not been identified for sites coming forward and instead the policy seeks to support their provision in principle.

In terms of affordable housing provision Welsh Development Quality Requirements 2021 Creating Beautiful Homes and Places: Preface [12] advises: The standard will be applied in full to all publicly funded affordable housing schemes submitted to Welsh Government at "concept" stage for technical scrutiny from 01 October 2021. New affordable homes delivered through planning agreements (under section 106 of the Town and Country Planning Act 1990) and planning conditions will only be required to meet the Appendix A and Appendix B "**space requirements**" for agreements entered into after 01 October 2021.

Appendix A to the Welsh Development Quality Requirements 2021 advises *Homes should be of sufficient size to meet the needs of occupants, have a convenient layout for everyday living and have adequate circulation space.* ***Space requirements will be met where****:*

• *The dwelling provides the Gross Internal (floor) Area (GIA) and built-in storage area set out in Appendix B.*

[9] Welsh Development Quality Requirements 2021
[10] https://cms.pembrokeshire.gov.uk/objview.asp?object_id=12043&language= SD27
[11] https://www.pembrokeshire.gov.uk/objview.asp?object_id=11582&language= SD45
[12] https://www.gov.wales/sites/default/files/publications/2021-08/development-quality-requirements-for-housing-associations.pdf

• *Accessibility requirements will be satisfied by designing dwellings* ***to meet the Lifetime Homes Standards*** *as published by the Joseph Rowntree Foundation.* *http://www.lifetimehomes.org.uk/pages/revised-design-criteria.html ...*

Space Standards	WDQR*	WDQR* Appendix A	Lifetime Homes in WDQR* Lifetime Homes** in Policy GN15 (5 or more market dwellings)	WDQR* Gross Internal Floor Space Appendix B	Building Regulations M ***
Social Rented (Publicly Funded)	100%	100%	100%	100%	100%
Affordable S106/condition	N/A	100%	100%	100%	100%
Private	N/A	N/A	20%	N/A	100%

*https://www.gov.wales/sites/default/files/publications/2021-08/development-quality-requirements-for-housing-associations.pdf Welsh Development Quality Requirements 2021 Page 3 2d) refers to Homes needing to meet the space standards in Appendix A and Appendix B.
* See also Appendix A page 70 (SD09.5)[13] of Appendix 4 - Issues Papers updated 23 September 2025 which provides a useful summary of the Welsh Government space requirements in full for Affordable Housing via S106 agreement and/or condition as set out in Welsh Development Quality Requirements 2021 Creating Beautiful Homes and Places.
** https://www.lbbd.gov.uk/sites/default/files/2022-09/Lifetime-Homes-Standards-Checklist-April-2015.pdf
***building-regulations-guidance-part-m-access-to-and-use-of-buildings.pdf

Wales Building Regulation requirements lie outside the planning policy framework. It is however useful to note that they include the requirements for dwellings regarding accessibility both internally and externally at ground floor level. Part M building-regulations-guidance-part-m-access-to-and-use-of-buildings.pdf *ii. Dwellings (a) so that people, including disabled people, can reach the principal, or suitable alternative, entrance to the dwelling from the point of access; (b) so that people, including disabled people, can gain access into and within the principal storey of the dwelling; and (c) for WC provision at no higher storey than the principal storey. 'Principal storey' is defined in Requirement M4.*

4b.This level of provision overall should result in a higher than 20% per site provision of Lifetime Home Standards where affordable housing is also required on site in addition to the 20% of the market provision on sites of 5+ already expected. To expect a greater amount would require re-visiting the Financial Viability Report 2024 (SD28[14]) and the current evidence would not suggest a greater requirement is currently justified. Providing exact figures is difficult as the housing provision for the Plan period is partly complete and partly permitted where the extent to which standards have already been met or can be met has not been recorded. Wheelchair accessible housing is supported rather than required.

Criterion D. could however usefully clarify that that the 20% Lifetime Homes Standards requirement applies to market dwellings (not just new build) on a site of 5 or more dwellings as affordable housing provision is already required to meet the standard. This proposed clarification is set out in Appendix A Part 1 Policy Edits Matters Arising Changes. [c]

[13] (SD09.5) Appendix 4 - Issues Papers updated 23 September 2025 – see page 70
[14] https://www.pembrokeshire.gov.uk/objview.asp?object_id=11531&language= SD28

4c. Paragraph 5.101 of the Local Development Plan 2 Deposit 2 advises that the requirement for 20% of the properties on sites of 5 or more has been included in the viability testing. BHL considered evidence on the additional costs associated with building to Lifetime Homes standards and concluded that those standards would add approximately 5% to the basic "plot cost" of an average dwelling size. Assuming that, on average, 10% of new dwellings on market-led housing sites would be affordable homes (already incorporating the Lifetime Homes standards), the plot cost rates shown in Appendix D to the Financial Viability Report 2024 (SD28[15]) include a supplement of 0.9% (added to the plot cost rate evidenced from BCIS and other sources) to allow for the requirement that 20% of private units should meet the Lifetime Homes standards or equivalent.	
5. Is criterion E effective? a. What is the justification for requiring all units to meet 'identified space standards'? b. Is the policy clear on which standards apply to specific housing types? c. Is it necessary to duplicate Building Regulations provisions within this policy?	MD
Closed **LPA Response:** 5. and 5 a, b, c: Criterion E. advises: '***All residential development must be built in accordance with identified space standards, unless the proposal is for the adaptation or conversion of a listed, historic or traditional agricultural building and it is not possible for the building to meet the standards without impacting negatively on the character of the property.'*** The purpose of the criterion is to acknowledge that buildings with a heritage value will need to be considered in terms of seeking to achieve space standards. TAN 24 (SD103[16]) explains how to approach situations where applying modern standards (e.g., minimum room sizes, accessibility, amenity space) could harm the significance of a historic building (listed). Paragraph 5.15 *…they must consider the sensitivity of that building to the proposed changes.* The Council would consider this principle to be equally applicable to other historic buildings as well. The criterion is intended to refer to the space standards required by criterion D). DQR applies to new-build affordable housing only, and building regulation requirements are a separate permitting mechanism to planning. Criterion E could be usefully clarified to explain its purpose. It is also proposed to update the table inserted as part of the Focussed Change FC5.GN15.02 to exclude reference to the Welsh Building Regulations. See Appendix A – Part 1 Policy Edits proposed Matters Arising Changes.[c]	
6. Is the policy wording sufficiently flexible to respond to changing circumstances?	MD

[15] Financial Viability Report 2024 Housing (SD28)
[16] https://www.gov.wales/technical-advice-note-tan-24-historic-environment - SD103

Closed **LPA Response:** 6. The policy framework is considered flexible. Changing circumstances would be primarily led by the publication of new Housing or Specialist Housing Needs Assessments or the development of an Article 4 Direction in relation to second and holiday homes. Changes in building regulation requirements would be outside the remit of the Plan. Criterion D. has also been updated to advise '*All new build residential development on sites of 5 or more units must provide a minimum of 20% of properties built to Lifetime Homes Standards* ***or equivalent*** to allow for updates in national policy requirements.	
7. Does Policy GN22 provide a clear and consistent framework for assessing specialist and supported accommodation proposals? a. How have the housing and accommodation needs assessments ([17]SD24, SD25[18]) and Local Housing Market Assessment 2023 ([19]SD27) informed the policy approach?	MD/JB (SH)
Closed **LPA Response:** 7. and 7a: The Local Development Plan provides for allocations for Specialist and Supported Accommodation under Policy GN 23. In addition, Policy GN 22 sets out a criteria-based policy for the provision of Specialist and Supported Accommodation both within and adjoining a settlement boundary. The policy's reasoned justification refers the 'Assessment of Specialist Housing and Accommodation Need for Older People in West Wales', November 2018 (SD24[20]) and 'Housing and accommodation needs assessment for people with learning disabilities in West Wales to 2035' (SD25[21]) as identifying the needs that the policy aims to meet. Figure 1, page 36 of the first report provides a typology of older people's housing and accommodation, ranging from moving from existing housing for example by downsizing or relocating for lower maintenance or moving to more adaptable homes or cohousing, 50+ housing and sheltered housing. These are banded in what is referred to as C3 General Needs Housing. The second part of Figure 1 refers to Specialist Housing and Care Homes which can be either C3 or C2 depending on the level of care and these include extra-care, retirement villages, residential homes nursing homes, hospitals and hospices. The implications for provision are highlighted: ▪ The need to provide for a mix of housing types and tenures including providing the opportunity to downsize and include specialist provision ▪ If residential care is to decline then include extra care housing ▪ Include care ready housing, without care on site where individuals can be visited with ease ▪ Existing sheltered housing improved to provide better support ▪ Older peoples housing schemes that are catering for people living with dementia – a housing/nursing hybrid	

[17] https://wwrpb.org.uk/wp-content/uploads/West_Wales_CP_Older_Peoples_Housing_Need_Assessment_HousingLIN-Final.pdf SD24
[18] https://wwrpb.org.uk/wp-content/uploads/WWCP_LD_Housing_Assessment_HousingLIN.pdf SD25
[19] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12043&language= SD27
[20] https://www.housinglin.org.uk/Topics/type/An-assessment-of-the-demand-for-specialist-housing-and-accommodation-for-older-people-in-Wales/
West_Wales_CP_Older_Peoples_Housing_Need_Assessment_HousingLIN-Final.pdf SD24
[21] WWCP_LD_Housing_Assessment_HousingLIN.pdf– SD25

- Co-housing initiatives for older people
- Adaptation of existing homes.

The difficulty with planning for these needs in a more prescriptive way is understanding how they can be translated to a more local level.

At a strategic level, the Local Development Plan can provide for housing requirements where identified land is available and can be viably delivered. Here the level of affordable housing delivery is tested depending on housing market conditions etc., the identified need – Local Housing Market Assessment and what the viability testing can absorb regarding housing standards demands for example.

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Policy GN 15 sets out requirements at a Plan level in terms of mix, tenure and standards for housing layouts. Supplementary Planning Guidance can also set out prescriptions regarding affordable housing provision (tenure, number of bedrooms required, including key worker expectations) more explicitly.

At the more detailed planning application stage the expertise of the housing authority is also used to refine the more generic expectations given Officers' knowledge of existing provision for various types of accommodation including wheelchair accessible requirements.

Social Services are part of that assessment as well depending on the expertise required. Affordable housing provision is normally publicly funded or cross-subsidised by the developer.

The housing authority/social services department can also secure land to provide for development types. Beyond the requirements set out in generic policies of the Plan and the housing allocations (for C3 uses) and the specialist housing allocations which is the primary focus for delivering the needs identified in Policy GN 22 the planning authority does not have sufficient evidence to specify in greater detail as to when and where further specialist housing may be required.

It can, however, use the criteria-based policies of the Plan to enable such provision as spending priorities crystalise. For example, at present The West Wales Regional Partnership Board Capital Strategy July 2023 sets out in Appendix 5 Strategic Priorities for up to 10 years.[22]

For Pembrokeshire there is reference to a Fishguard Health and Wellbeing Centre which could be considered under Policy GN 29 Community Facilities. The Council is also dealing with a representation as part of this consultation regarding the potential provision of such a facility at the Maesgwynne housing allocation site in Fishguard. The Strategy advises that further scoping is needed.

The redevelopment of Haverfordia House is referred to which can be accommodated within the policy framework of the Local Development Plan in particular GN 13 Residential

[22] https://wwrpb.org.uk/capital-strategy/ capital programme for development Regional Partnership Board July 2023 West Wales

Development. A care facility at Pembroke Dock involves the repurposing of residential units adjacent to the Community Hospital. The refurbishment of accommodation at St Ishmaels for Children and Young People is listed along with the refurbishment of property at Rock Farm. The table included in the reasoned justification of Policy GN 22 (Figure 4) refers to figures that can also be found in the document entitled: 'An assessment of the demand for specialist housing and accommodation for older people in Wales 01/01/20' (SD24[23]). See Table 50 on page 52. Pembrokeshire estimated net demand (shortfall in units/beds) to 2035. An annexe to that report provides built examples of provision referred to in the Table and this can be used determine whether the Local Development Plan can facilitate these types of requirements. On reviewing the accommodation types likely to come forward, the Plan's policy framework is considered to be sufficiently flexible to consider such proposals as they come forward.	
7 b. Is the first criterion of Policy GN 22 (FC5.GN22.03) sufficiently responsive to wider-than-local needs? Why is it necessary to receive the Strategic Commissioning Team's support?	MD/JB (SH
Closed **LPA Response:** The primary responsibility is to meet the specialist and supported accommodation needs of the population of Pembrokeshire, including those living outside but close to the boundaries of Ceredigion and Carmarthenshire. In addition, there is an England and Wales strategy to reduce the number of children's placement outside the County. Pembrokeshire is a popular retirement destination and there is a need to consider the increasing needs as people age on the impacts on local infrastructure and a reduced population of working age. Decisions need to be taken within the context of the wider implications for the locality, infrastructure and services thus needing the input of the Strategic Commissioning Service.	
7 c. What is an 'appropriate' existing building?	
Closed **LPA Response:** 7c. The term 'appropriate' building is not defined in the policy's reasoned justification. The intention is to allow an additional opportunity for provision through the reuse of building in the countryside. The term appropriate would be within the context of Policy GN 34 which deals with the conversion of buildings in the countryside where residential uses are promoted in traditional buildings. Additional wording to explain this could be added to the reasoned justification of the policy if this was considered to be an appropriate way forward for the Inspector.	
7 d. What is the justification for allowing exceptions for children's homes (FC5.GN22.02)? Does the new paragraph after 5.128 align with the policy wording?	MD/JB (SH

[23] https://www.housinglin.org.uk/Topics/type/An-assessment-of-the-demand-for-specialist-housing-and-accommodation-for-older-people-in-Wales/ SD24

Closed

LPA Response:

7d Policy GN 22 and Children's Homes:

The planning system is not the only regulatory regime relevant to children's home. There is also guidance that care providers should follow when registering and operating a children's home (including the suitability of locations through location assessments). 'Guidance for registering a care home for children September 2024'[24] published by the Care Inspectorate Wales (CIW).

The regulations and statutory guidance under the 2016 Act set out the requirements for all care homes. This guidance provides advice on specific considerations for location, layout and design when setting up a care home service for children.

The premises must be located, designed, and equipped to meet the specific needs of the children for whom the service is intended. Paragraph 6.3 advises *'The location of a care home for children is a critical consideration in ensuring children feel safe, secure and are supported to lead an active and full life within the community. Service providers must ensure the location of the premises is suitable to achieve the aims and objectives of the service as set out in the statement of purpose.'* Paragraph 6.4 advises: *'As part of the location assessment service providers should consult the local authority where the home will be located and consider publicly available local data, such as local crime statistics, consult with relevant local services, undertake a risk assessment, and develop risk management strategies. CIW will ask for evidence of these assessments having been carried out during the registration process. CIW's good practice consideration checklist provides additional guidance.'* Paragraph 6.5 advises *'Ease of access to the local community and relevant facilities, such as education, health, employment, and leisure, as well as access to public transport must be taken into account. Where public transport is limited, the service provider must consider how they will facilitate community access.'*

Paragraph 6.6 advises: *'Children's attachment to, and inclusion in, their community is essential for their development of identity, security, and sense of belonging. Some children's care homes may have a rural or isolated location in line with the aims and objectives for the type of service they wish to provide, and for some children this might be a preferred option. However, for most children a well-connected care home which is integrated into the local community will have a positive impact on their well-being.'*

Whilst it may appear that a children's care home could fall under either C2 or C3 use, case law has found that children could not form a household on their own and therefore where carers do not reside at the premises, the use class will fall within C2. (North Devon District Council v First Secretary of State [2003] EWHC 157 (Admin)) In the majority of (but not all) cases, care providers will not reside at the premises and so most children's homes will come under C2.

The Policy as written reasonably reflects the objectives of the Care Inspectorate

[24] https://www.gov.wales/sites/default/files/publications/2026-04/guidance-on-registering-a-care-home-for-children-in-wales_0.pdf

Wales Guidance set out above with proposals guided to locations that are well served with services. The conversion or adaptation of a building, albeit in a countryside location is also allowed. All that is left then is to allow for the potential for new build in a rural setting in exceptional circumstances.

These amendments were included as focussed changes to both the policy and the reasoned justification. No further change is considered necessary.

7e. Is the new sentence restricting market housing proposals outside settlement boundaries justified (FC5.GN22.03)?

LPA Response:

7e The Council recognises that accommodation for older people may be delivered through the private market rather than as affordable or supported housing.

Examples include:

- Retirement apartments
- Leasehold retirement housing
- Integrated Retirement Communities

The Welsh Government's assessment of demand for specialist accommodation explicitly includes both social-rented and owner-occupied forms of specialist housing.[25]

What needs to be ensured is that developers do not use a specialist housing policy simply to deliver unrestricted market dwellings which isn't permitted in a countryside location in national planning policy.

Distinction Between Housing Types

Type	Usually Regarded as Market Housing?
Retirement apartments for sale	Yes
Age-restricted housing for sale	Yes
Affordable extra care housing	No
Supported housing funded through public services	No
Residential care home	Generally no
Nursing home	Generally no

From a development management perspective, the Council would accept a **market-led retirement or extra care scheme** either within a settlement or on the edge of a settlement if it:

- meets an identified local need;
- delivers appropriate accessibility and care-ready design; and

[25] https://www.gov.wales/sites/default/files/publications/2020-01/independent-report-on-accommodation-for-older-people.pdf

▪ functions as specialist accommodation rather than ordinary market housing. It would therefore may be beneficial to insert the word 'Unrestricted' at the beginning of the sentence '*Market housing proposals will not be permitted outside settlement boundaries'* if the Inspector considers this to be an appropriate clarification.	
8. Policy GN 23 allocated sites: SSA/089/01 South west of Park House, Tenby SSA/089/LDP2/01 East of Park House, Tenby SSA/135/LDP2/01 North of Bulford Road Bypass, Tiers Cross SSA/088/LDP2/01 Redstone, Narberth a. Have the allocations followed a robust site assessment process, including a call for sites? b. Could any constraints or adverse impacts be satisfactorily mitigated on each site? c. To what extent would the allocations contribute towards addressing identified needs? d. What are the mechanisms and timescales for delivering each allocation? e. Should details of the allocations ([26]ED12i) be included in the Plan?	SH/JB (BS)
Closed **LPA Response:** 8a. Yes. All of the sites allocated for specialist and supported accommodation under Policy GN23 of the Plan were submitted as Candidate Sites. Each were submitted for several uses. The outcomes of the assessments are detailed in the Candidate Site Register (SD08.4[27] – Park House and Redstone; SD08.6 [28]– Tiers Cross). 8b. Each site has been subject to consultation with internal Council Departments and Key Organisations to identify constraints and any necessary mitigation. 8c and d. The need for specialist and supported accommodation is set out in the response to Q7a above. Delivery of specialist and supported accommodation on sites allocated in the Plan depends on whether it is public or private sector provision. Public sector accommodation is delivered in accordance with the Council's Social Service Strategic Commissioning Plan 2025 – 2035. The Plan is an evidence-based commissioning plan to provide for a range of solutions to mitigate demand and market risks. It sets out a series of commissioning intentions aiming to rebalance the market, in terms of sufficiency of supply against increased and changing demand, and in terms of developing a mixed and balanced market across the independent, voluntary/community and public sectors. The Plan has a strong strategic intent addressing the challenges pertaining to older adults, adults and children through a mix of projects, many of which require development and therefore capital investment. Types of accommodation required to meet the identified needs will vary and the allocations included in LDP2 may help to accommodate some of that need, particularly when located close to existing facilities at Park House and Tiers Cross.	

[26] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12296&language= ED12i
[27] https://www.pembrokeshire.gov.uk/objview.asp?object_id=11579&language= SD08.4
[28] https://www.pembrokeshire.gov.uk/objview.asp?object_id=11581&language= SD08.6

Public Sector provision, delivered in accordance with the Social Services Strategic Commissioning Plan takes into account the availability of development partners and funding streams. These are usually the Welsh Government, the Housing with Care Fund and the Integration and Rebalancing Capital Fund. It is the availability of such funding that will determine the rate at which provision can be delivered. The site for each project will need to be considered in the context of the specific accommodation requirements and located where greatest need arises and sites chosen to be most deliverable. This means that the allocated sites will not necessarily be prioritised for development.

The public sector is not capable of providing for all of the identified need. Some will be met by the private sector, but not all private sector proposals are discussed with the Social Services team and so delivery rates are unknown. In combination, Policies GN 22 and GN23 will provide the ability for both the public and private sector proposals to be delivered. The extent to which the allocated sites will contribute to meeting the identified need is unknown.

8e. Document ED12i[29] will eventually form Supplementary Planning Guidance (SPG). A 'fact-sheet' has been prepared for all of the sites allocated for all purposes in the Plan. It is considered that this level of detail is better published as SPG which will allow for the information to be updated if necessary.

Gypsy and Traveller accommodation BS (MD)

9. Does the approved GTAA 2019 provide a robust basis to inform the LDP strategy? BS
a. Should the Council allocate a transit site? BS
b. What is the status of the most recent GTAA? BS

Closed

LPA Response:

9. The approved Pembrokeshire GTAA 2019 (SD23[30]) does provide a robust basis to inform the LDP 2 strategy for provision of Gypsy and Traveller accommodation. To provide some clarity on this, although the date is 2019, in fact the documentation was significantly updated following its initial submission to Welsh Government, with revisions made in December 2020 and March 2024, with approval by the (then) Cabinet Secretary for Culture and Social Justice following on 24th May 2024. The GTAA 2019 was subject to thorough scrutiny and review by Welsh Government officers prior to its adoption.

LDP 2, Deposit Plan 2 reflected the outcomes presented in the GTAA 2019 and noting that various modifications have been made to the LDP 2 policies and proposals following the Deposit-stage consultation, with various Focussed Changes proposed.

Welsh Government expects the next GTAA to reach them, in draft form, in February 2027. PCC is aware that this may identify additional need, so the LDP 2 policies and proposals have been developed to provide a degree of flexibility should additional provision be needed.

The Council has made allocations for Gypsy and Traveller accommodation in LDP 2, in two cases taking the form of site extensions to existing local authority sites and in one case being

[29] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12296&language= ED12i
[30] https://www.pembrokeshire.gov.uk/objview.asp?object_id=11503&language= SD23

a completely new site. There is also a criteria-based policy which will amongst other things facilitate any proposals coming forward for private Gypsy and Traveller sites, recognising that these make an important contribution to the overall provision in Pembrokeshire. Closed 9.a Regarding transit sites, the Pembrokeshire GTAA 2019 (SD23[15]) concludes that a transit site is not needed in Pembrokeshire. There are many references to transit sites in this latest iteration of the GTAA and it is worth recording that one of the households that responded to the survey work was resident on a transit site (albeit a single household one). Generally, views on whether more transit sites are needed in Wales from the Pembrokeshire Gypsy and Traveller community were mixed. There are comparatively few Gypsies and Travellers currently living in Pembrokeshire who do travel, but there are a few. Only two respondents to the survey work specifically identified a need for a transit site in Pembrokeshire. It was concluded that this was not sufficient to justify providing such a site (notwithstanding that there is one small site already). However, it is a matter that is being kept under review. It will be re-considered in conjunction with the preparation of the Pembrokeshire GTAA 2027. Closed 9.b The Pembrokeshire GTAA, 2019 (SD23[31]), was originally submitted to Welsh Government in 2019, but was then updated in response to feedback in December 2020 and again in March 2024. Approval by the (then) Cabinet Secretary for Culture and Social Justice followed on 24th May 2024. Welsh Government has asked for the next GTAA to be submitted in February 2027.	
10. Does the planned net gain in pitches from the three sites allocated under Policy GN 24 reflect the most up-to-date evidence of forecast need? Does the supporting text to Policy SP 4 reflect this latest evidence?	BS (MD)
Closed **LPA Response:** 10. The most recent evidence of forecast need is that presented in the Pembrokeshire GTAA, 2019 (SD23[32]). This identifies an immediate need for 9 pitches (2019-2024) and a further need for 30 pitches (2025-2033). Planning permissions have been granted for 14 pitches, which meets the immediate need and an element of the further need. The residual requirement is therefore for 25 pitches. The Council's LDP 2 allocations total 31 pitches, with a prospect that additional space might be available on the new site (adjacent to Monkton Playing Fields), should it be needed. The Council has allocated for a little more than the forecast need to reflect: a) that there isn't a perfect match between the sites where the need was identified and the 14 pitches with planning permission and b) that a new iteration of the Pembrokeshire GTAA is expected in 2027, which may identify additional demand within the LDP 2 Plan period (but we cannot be certain at present).	

[31] https://www.pembrokeshire.gov.uk/objview.asp?object_id=11503&language= SD23
[32] https://www.pembrokeshire.gov.uk/objview.asp?object_id=11503&language= SD23

The supporting text to policy SP 4 does reflect the latest published evidence of need (that in the Pembrokeshire GTAA, 2019), but to note also that there is unpublished information held by housing colleagues regarding those on the waiting list for Gypsy and Traveller accommodation, another reason to allocate for slightly more than the published need.	
11. The Gypsy and Traveller Background Paper including Sites Assessment (SD51[33]) sets out the process for identifying and assessing sites in and around Pembroke Dock and Pembroke. a. Why was the assessment limited to Pembroke Dock and Pembroke? b. Were other locations and sites considered?	BS
Closed **LPA Response:** 11.a and 11.b The need for additional Gypsy and Traveller accommodation is predominantly (but by no means exclusively) in south Pembrokeshire. Gypsy and traveller communities are long established in this part of the County. There are also some smaller communities in other parts of the County. Although not recorded in the Gypsy and Traveller Background Paper, which was published in 2019, there was a subsequent further (and much more extensive) consideration of potential sites which looked more widely than just in and around Pembroke and Pembroke Dock. The outcome of this further work was reported to Cabinet on 20th May 2024 and again on 11th July 2024 but noting that the documentation was in each case restricted and some of the debates were held in private session. For that reason, an update to the earlier Background Paper was not possible. PCC Cabinet on 11th July 2024 considered LDP 2 and the decisions made in the 20th May and 11th July reports with regard to provision of Gypsy and Traveller accommodation were taken forward into the version of LDP 2, Deposit Plan 2 considered by Cabinet that day and then subsequently at the Extraordinary Council meeting on 13th September 2024. For information, there was also one LDP 2 Candidate Site which proposed Gypsy and Traveller accommodation, CS 148, which was rejected by the Council, the reasons being set out in the Candidate Site Register and Site Assessment, September 2024 (SD08.5[34] - recorded under Pembroke). LDP 2, Deposit Plan 2's provisions for Gypsy and Traveller accommodation were subsequently modified by various Focussed Changes. The allocations in the latest iteration of LDP 2 are for two extensions to existing Local Authority sites – at Kingsmoor and Withybush – and for one completely new Local Authority site at Monkton, Pembroke (which is physically separate from the existing Local Authority site at Castle Quarry) - as set out in policy GN 24. There is also a criteria-based policy on Gypsy, Traveller and Show-peoples' sites, GN 25.	
12. Allocated sites: GT/003/LDP2/01 Land west of Kingsmoor Common Gypsy and Traveller site, Begelly GT/040/LDP2/01 Land east of Withybush Gypsy and Traveller site GT/095/LDP2/02 Adjacent to Monkton Playing Field 12a. Have the allocations followed a robust site assessment process, including a call for sites?	
Closed	

[33] https://www.pembrokeshire.gov.uk/objview.asp?object_id=7611&language= SD51
[34] https://www.pembrokeshire.gov.uk/objview.asp?object_id=11580&language= SD08.5

LPA Response: 12 and 12a. Yes, there was a robust site assessment process. The call for Candidate Sites only produced one site, CS 148, which was rejected (see answer to question 11 and document SD08.5[17]). The assessment of other sites (identified by the Council separately from the Candidate Site process) was robust, but as noted in the answer to question 11 the documentation was restricted and some of the discussions were held in private session, with only the selected sites being made public.	
12b. Do the choice of sites, including their locations and relationship with neighbouring uses, align with evidence from the GTAA 2019, the Background Paper (paras 6.5 and 7.1) and Circular 005/2018?	BS (MD)
Closed **LPA Response:** Yes, they do, because they reflect the location of much of the demand and the scale of need identified by the Pembrokeshire GTAA 2019 (SD23[35]). Consideration also needs to be given to the provision of private sites, which significantly widens the geographic spread of provision.	
c. Do the local authority allocations in terms of site location, size, and potential capacity, comply with Guidance for designing Gypsy and Traveller sites (July 2026)?	
Closed **LPA Response:** In terms of location, size and potential capacity they do comply, although it should be noted that the latest Guidance has only recently been published and post-dates much of the work on PCC's LDP 2. In terms of the detail of how the new / extended sites are designed, this will be considered in due course. However, PCC has prepared implementation details for each of the allocated gypsy and traveller sites (2 x extensions and 1 x new site), which can be viewed in document ED12c [36]– Gypsy Traveller Allocations GN 24.	
12d. Could any constraints or adverse impacts be satisfactorily mitigated on each site?	
Closed **LPA Response:** 12d. Yes, the constraints / adverse impacts could be satisfactorily mitigated on each site. However, to be clear, this will not necessarily be quick or straight-forward in all cases. Issues relating to contamination and to de-registration of Common Land are probably the most difficult but are resolvable.	
12e. Is it appropriate that land west of Kingsmoor is on common land? What are its implications for site delivery?	
Closed **LPA Response:** The presence of Gypsies and Travellers on Kingsmoor Common is very long-standing. Site extensions have required the extinguishment of common rights on the affected land, which is in Council ownership but has attached grazing rights which are held by the commoners. The extinguishment of common rights at this location is subject to the provisions of the Pembrokeshire County Council Act, 1965 and the Dyfed Act, 1987. It is a	

[35] https://www.pembrokeshire.gov.uk/objview.asp?object_id=11503&language= SD23
[36] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12290&language= ED12c

time-consuming process and will probably take about a year to work through. However, it has been done before and can potentially be done again.	
12f. What are the mechanisms and timescales for delivering each allocation?	
Closed **LPA Response:** 12f Delivery of the allocated sites is likely to be heavily dependent on securing Welsh Government Gypsy and Traveller Capital Sites Grants, which is potentially available but will need to be applied for. Regarding ownership, the two extension sites are in Council ownership. The new site, adjacent to Monkton Playing Fields, was privately owned but has recently been purchased by the Council. Clearly, having allocations in an adopted LDP will be beneficial in enabling successful grant applications to be made to Welsh Government. It is difficult to be certain regarding timescales, but there are compelling reasons to move ahead at pace in each case – and certainly within the LDP 2 Plan period. At Withybush and Monkton, development of the extended / new sites has the potential to facilitate upgrading of existing sites.	
12g. Should details of the allocations (ED12c[32]) be included in the Plan?	
Closed **LPA Response:** 12g Details of the Gypsy and Traveller allocations are included in policy GN 24 of LDP 2. Further details about each site are available in document ED12c[37], which contains implementation information, including site constraints. These would become part of the Development of Sites and Infrastructure SPG.	
13. Does Policy GN 25 provide a clear and consistent framework for assessing proposals? a. Is it consistent with national policy? b. Are criteria 1 and 2 of Policy GN 25 realistic in conjunction with one another? c. Is criterion 1 consistent with the approach for identifying sites in Circular 005/2018?	MD (BS)
Closed **LPA Response:** **13. Policy GN 25 – Criterion 1: Circular 005/2018:** Planning Policy Wales Edition 12 (SD80[38]) has a presumption in favour of sustainable development. Factors to be taken into account in establishing the sustainability of sites are set out in paragraph 37 of Circular 005/2018 (SD78[39]). Paragraphs 38 and 39 advise that first consideration should be for sustainable locations within or adjacent to existing settlement boundaries with access to local services, and that sites in the countryside away from settlements can be considered if there is a lack of sustainable locations. An over rigid application of national or development plan policies that seek a reduction in car borne travel to effectively block proposals for any Gypsy and Traveller Site in a countryside location would be inappropriate. Both Planning Policy Wales and the Circular recognise that there are wider economic, social and environmental dimensions to sustainability. Criterion 1 of Policy GN 25 is consistent with that approach. The Inspectorate's letter to	

[37] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12290&language= ED12c
[38] https://www.gov.wales/planning-policy-wales SD80
[39] https://www.gov.wales/sites/default/files/publications/2019-05/planning-for-gypsy-traveller-and-showpeople-sites-wgc-0052018.pdf SD78

Chief Planning Officers in Wales in December 2018 advises that at appeal stage applicants will be asked '*What efforts have been made to find an alternative site, e.g. approaching Council's housing and planning departments including applications for a pitch on a Local Authority site, estate agents, land owners, other Gypsies and Travellers? Written evidence should be provided wherever possible*.'

A recently adopted Local Development Plan for Bridgend (Adopted 13th March 2024) also advises (COM8)[40]: *Proposals for Gypsy, Traveller and Showpeople sites in the countryside, away from existing settlements, will be permitted where: a) There are a lack of suitable sustainable locations for sites within or adjacent to existing settlement boundaries;'*

In terms of criterion 2 local authorities are advised in paragraph 38 of the Circular *'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 goes on to say, *'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'*.

Paragraph 5.132 of Local Development Plan 2 advises: *'Proposals for new sites or extensions to existing authorised sites must have good access to services particularly primary schools and doctors surgeries by means other than the private car. Active travel routes and access to public transport will be key to deciding whether a site has good access to services and is in a sustainable, viable location for connection to services including water, waste water disposal and collection.*

This supporting paragraph when read in conjunction with criterion 2) is inconsistent with paragraph 39 of Circular 005/2018.

The policy attempts to cover both instances where sites could come forward adjacent to settlement boundaries and further away from local service provision.

The policy could usefully be edited to mirror the approach taken by Bridgend Local Development Plan[41] which should resolve this inconsistency – see Policy COM8 page 119. The Council can take this forward as an Action Point if this is considered an appropriate way forward by the Inspector.

[40] https://www.bridgend.gov.uk/media/izcfgp1f/written-statement.pdf COM8:Gypsy,TravellerandShowpeople Accommodation, page 119

[41] https://www.bridgend.gov.uk/media/izcfgp1f/written-statement.pdf COM8:Gypsy,TravellerandShowpeople Accommodation, page 119