Statement of Common Ground Number 2

Issued on behalf of Pembrokeshire Coast National Park Authority, Pembrokeshire County Council in respect of the following representation from Welsh Government on the Pembrokeshire Coast National Park Local Development Plan 2:

'The GTAA states there is a need for 101 pitches across Pembrokeshire (2031) with an immediate need (by 2020) for 32 residential pitches and 2 Travelling Showpeople's yards. The Deposit Plan states "no need has been identified in the PCNP" (paragraph 4.301). This statement should be supported by a Statement of Common Ground with Pembrokeshire County Council and the Welsh Government's Equality and Prosperity Division in advance of the LDP examination.'

Examination Pembrokeshire Coast National Park Local Development Plan 2



Why was this Statement of Common Ground prepared?

- 1. The Local Development Plan Manual August 2015 advises:
 - a) '6.4.2.18 Agreeing with key infrastructure providers a 'statement of common ground' that can be refined as work on the plan progresses can be a useful way to evidence commitment and deliverability.'
 - b) '7.5.1.1 Where there are strategic and/or substantial objections to the deposit plan, or ones from statutory consultees, the LPA may wish to discuss further with the respondent(s), whether they will reconsider their objection, and which aspects can be agreed in order to narrow the disagreement to its essentials. Including areas of agreement/disagreement with substantive objectors, which may include a compromise position, in a "statement of common ground" for the Inspector would be helpful at this stage. Any subsequent contact with respondents should be identified in the consultation database.'
- 2. This Statement of Common Ground is in pursuance of the aim set out in 'b'.
- 3. It is produced in response to the following comment received from Welsh Government within its representation dated 23rd May 2018 to the Pembrokeshire Coast National Park Authority's Deposit Local Development Plan 2 consultation:

'The GTAA states there is a need for 101 pitches across Pembrokeshire (2031) with an immediate need (by 2020) for 32 residential pitches and 2 Travelling Showpeople's yards. The Deposit Plan states "no need has been identified in the PCNP" (paragraph 4.301). This statement should be supported by a Statement of Common Ground with Pembrokeshire County Council and the Welsh Government's Equality and Prosperity Division in advance of the LDP examination.'

- 4. Welsh Government have subsequently advised that the Welsh Government's Equality and Prosperity Division do not comment on the location of sites unless there is a specific problem with the site proposed.
- 5. In the case of the Pembrokeshire Coast National Park Local Development Plan 2, the SoCG agrees the location of sites will not be in the Park. If the Council are in agreement, this is not an issue that Welsh Government would comment on.
- 6. From an LDP perspective, Welsh Government advise that if the SoCG is signed by the Council agreeing the need in Pembrokeshire will not be met in the Park, it is unlikely Welsh Government will have any further concerns in this respect.

Text of Agreement

- 7. Surveys were undertaken in October and November 2015 for the Pembrokeshire County Council 2015 Gypsy Traveller Accommodation Need Assessment Draft (2015 GTANA). Surveys included residents on Local Authority residential sites; a Local Authority transit pitch; private sites; unauthorised encampments; and developments; and tenants in 'bricks and mortar' accommodation. The Travelling Showpeople community was also included in the survey, with the timing of the survey coinciding with the Pembroke Fair.
- 8. An unmet need for 32 residential pitches, plus two Travelling Showpeople's yards, over the next five years (by the end of 2020) has been identified in this assessment. Over the Plan period for PCC and PCNPA (up to the end of 2021) this equates to a need for 37 residential pitches and two Travelling Showpeople's yards. The unmet need over the period up to the end of 2031 for the pending PCNPA and PCC replacement Plans is projected to be 101 pitches, plus the two aforementioned yards.
- 9. The Council has analysed the responses which identified a need for additional accommodation. To help to plan future provision, this need has been grouped into three geographic areas. These are: Haverfordwest, Pembroke/Pembroke Dock and Kilgetty.
- 10. No need has been identified in the Pembrokeshire Coast National Park.
- 11. Both PCC and the PCNPA have Local Development Plan policies which allow for private sites to be developed where they meet certain criteria. Welsh Government has raised an objection regarding criterion a) of Policy 51 Gypsy Traveller and Showpeople Sites of the Deposit Local Development Plan 2 for the Pembrokeshire Coast National Park. This will be dealt with separately and does not form part of this Statement of Common Ground.
- 12. Officers of the National Park have liaised with the Council's Gypsy & Traveller Accommodation Assessment Steering Group during the revision of the Local Development Plan.
- 13. An opportunity to help address the shortage of gypsy and traveller sites has been provided with the National Park Authority inviting the submission of sites as part of the Candidate Site submission process. No sites were submitted for consideration.

Signed: Marto Dune Signed: **Martina Dunne Head of Park Direction Pembrokeshire Coast National Park** Authority Date 8/4/2018 Date Signed: Signed: SX Morris Sara Morris ANDREN DAVIES-WRIGLEY **Development Plans and Conservation** PRIVATE SECTOR HOUSING R HOUSING Manager STRATEGY MANAGER **Pembrokeshire County Council** PEMBROKESHIRE COUNTY COUNCIL Date 04/06/18 5/6/18 Date Statement of Common Ground date logged in the Comments Schedule for Submission for Examination Yes/No