1) I note the Council’s confirmation that the allocation of land at Celtic Way, Coedkernew as a gypsy/traveller transit site will be removed from the Plan, following consideration of the matters raised by me after Hearing Session 5.

2) I also asked the Council to provide proposals for how the Plan should deliver the identified gypsy and traveller transit accommodation requirement following my determination that the Celtic Way allocation renders the submitted plan unsound. I have considered the Council’s observations concerning the options it considers are available, and its supporting reasoning. I have also considered the comments of Welsh Government on the Council’s response, in particular in relation to matters concerning a potential regional approach to transit site provision and the approach to site provision in LDPs by other local authorities in south east Wales.

3) I note the Council’s statement that its preferred option is for the former Ringland Allotments site also to be deleted from the submitted LDP, in favour of a regional site search process. However, it is evident from the comments of Welsh Government that such an approach has yet to be formally considered and developed as an effective way forward, and that emergence of such a process would be likely to be some way off.

4) The Council’s evidence base identifies an existing need for gypsy and traveller transit accommodation. It has based its submitted Plan on a detailed assessment of the gypsy and traveller residential and transit accommodation needs of its area. It has concluded, following an extensive and protracted site identification and assessment process and taking into account views expressed by others, that the former Ringland Allotments site is suitable for development as a site of about 7 pitches for either residential or transit gypsy and traveller purposes; hence its allocation as a contingency site for either purpose in the submitted Plan. Following the oral hearing session the Council remains of the view that the site is suitable for this purpose.

5) The Plan as submitted for examination (and as such considered by the Council to be sound) identified a need to provide a gypsy and traveller transit site. It made such provision, and allocated the former Ringland Allotments site as a contingency should the Celtic Way site not meet identified needs. The Celtic Way site will not now meet the identified existing need for 7 pitches, as it will be deleted from the Plan. Removal of the former Ringland Allotments site, which the Council has found suitable, without
identifying a better, currently available alternative, would fundamentally undermine the soundness of the Plan. It would leave the Council in the position of having identified an immediate need, which it has a statutory duty to address, and proposing to delete a sound allocation which would address that need without a specific, deliverable alternative.

6) Accordingly, on the basis of the Council’s response I consider that the only adequate option of those that the Council has put forward is Option B (allocate former Ringland Allotments as transit site). Whilst I have borne in mind the matters raised in representations concerning physical and technical constraints to development, the Council has considered these matters and I do not regard them as obstacles which render the site unsuitable or undeliverable. Whilst I note comments made about potential effects on build rates at site H1(3) Llanwern Village, the extent of such an effect, if any, is uncertain and difficult to quantify. The Plan monitoring indicators now proposed include specific monitoring of the completion rate on this strategic site, enabling consideration of appropriate action to maintain overall housing delivery should the rate on this site for any reason fall behind that anticipated.

7) On the basis of the above I consider that the appropriate course of action is for the Council, in addition to deleting references to land at Celtic Way, Coedkernew, to identify the former Ringland Allotments site as a specific, rather than contingency, allocation for gypsy and traveller transit accommodation in policy H15; and to delete reference to the former Ringland Allotments from policy H16 and supporting text. I therefore invite the Council to do this.

Alwyn Nixon
Examination Inspector
20 May 2014