

**Newport Local Development Plan
Examination
Hearing Session 5: Gypsy and
Traveller Sites**

Submission on behalf of Gallagher Estates
(Representation No. 1401)

March 2014

Turley

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Contact

Gareth Barton

Client

Gallagher Estates

LPA reference

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1. Introduction

- 1.1 This Statement has been prepared on behalf of our clients, Gallagher Estates, in relation to Hearing Session 5 (Gypsy and Traveller Sites) of the Newport Local Development Plan (LDP) Examination. It addresses the main discussion matters identified by the Inspector that are considered relevant to our clients interests and have not been covered fully by previous representations.
- 1.2 By way of context our clients own circa 44 hectares of land at Llanwern, which is allocated in the adopted Unitary Development Plan (UDP) and emerging LDP as part of the Eastern Expansion of Newport. The site, known as Llanwern Village, also benefits from extant outline planning permission for up to 1,100 new homes (Ref: 13/0806). Llanwern Village adjoins Ringland Allotments, which is allocated in the Revised Deposit LDP (December 2013) (SD3) as a contingency permanent residential or transit gypsy and traveller site.

2. Main Discussion Matters

Matter 1: Need for Provision in Plan

On what basis is the need for residential pitches predicted to increase to 43 pitches by 2026? Are these numbers consistent with the gypsy and traveller accommodation assessment of January 2010 (SD106) - if not, why not?

- 2.1 The predicted need of 43 residential pitches by 2026 is not consistent with the Gypsy and Traveller Accommodation Assessment (January 2010) (SD106). The Accommodation Assessment identified an immediate need of 25 pitches and a projected population growth of four pitches between 2014 and 2019 (3%). Whilst the Revised Deposit Plan covers a longer plan period (to 2026), it clearly seeks to accommodate a significantly higher need than the 2010 Accommodation Assessment.
- 2.2 The higher need was first identified as part of a wider report to the City Council's Scrutiny Committee for Community Planning and Development on 24 April 2013. The report states that the gypsy and traveller housing need had been identified through the original 2010 Accommodation Assessment and "subsequent research, liaison and assessment of gypsy and traveller families in Newport by Housing Officers." Limited information is provided in the report to support this new research/assessment, particularly when compared to the original Accommodation Assessment.
- 2.3 The Scrutiny Committee Report identifies an updated immediate need of 23 pitches split between three existing families and a total of need of 43 pitches over the plan period. The need for transit pitches remains as per the original 2010 Accommodation Assessment. This level of need was also reflected in the City Council's Gypsy and Traveller Accommodation Background Paper (June 2013) (SD105). The Background Paper again provides no further details of how the updated level of need had been assessed or justified.
- 2.4 Given that the provision made in the Revised Deposit Plan is based on the updated figures (for residential need at least), and this figure is significantly higher than the original Accommodation Assessment, a more robust update to the evidence base might be expected. Whilst not necessarily questioning the overall need now identified, a more comprehensive addendum or update to the Accommodation Assessment would be more appropriate in order to clearly, and robustly, justify the higher need requirement.

How many residential pitches does the Plan need to make provision for by way of allocated residential gypsy and traveller sites?

- 2.5 If the City Council's latest assessment of accommodation need is accepted there is a need to provide for 43 residential pitches over the plan period. As stated above, our client has concerns regarding the level of information provided to support the updated assessment of need (given that it represents a significant increase from the original evidence base). Nonetheless, it demonstrates that there is no requirement to allocate sites to accommodate more than 43 residential pitches over the plan period. As such,

there is clearly no justification for Ringland Allotments to be allocated as a contingency site. This is addressed in more detail below (see Matter 5).

Matter 2: Overall Residential Site Selection Process

Why were the results of the earlier site search and selection process (initial deposit Plan April 2012) subsequently deemed unsound?

- 2.6 Our client is not aware that the City Council has set out any clear reasons why the original results of the site search and selection process were deemed unsound. The process was reopened as a result of a change of political administration at the City Council. The reason given was to “ensure that the sites included in the Plan were the result of a transparent and democratic process”, rather than because the sites identified were considered unsound per se.
- 2.7 The original sites were included in the new site search and selection process, which indicates that they were not necessarily considered unsound at the outset. They were not, however, progressed through the selection process undertaken by the Scrutiny Committee, although limited information as to why they were subsequently ruled out has been provided by the City Council. It is important that the City Council demonstrate why the new administration moved away from the results of an earlier site search/selection process, which at that time were clearly deemed sound.

Matter 5: Ringland Allotments Allocation H15(ii) and H16(ii)

Is the site suitable for the proposed use(s), taking into account site constraints including topography, proximity to the southern distributor road dual carriageway, pylons crossing the site? What is the estimated capacity of the site (number of pitches)?

- 2.8 Ringland Allotments is clearly not suitable for use as a permanent residential or transit gypsy and traveller site given the numerous site constraints. As such, the allocation in Policy H15(ii) and H16(ii) is not realistic or appropriate having considered the relevant alternatives, and is not founded on a robust and credible evidence base. The allocations therefore fail the relevant tests of soundness (Test CE2).
- 2.9 Our previous representations to the Revised Deposit LDP identified a number of site constraints that render the land unsuitable for the proposed use. The City Council has, however, chosen to persist with the proposed allocation in the submitted LDP. Given the City Council's failure to recognise the site constraints that affect Ringland Allotment our client has instructed consultants to consider the suitability of the site for the proposed use. The additional technical work/advice covers
- Highways/access
 - Noise
 - Impact of Power Lines
 - Topography

- Landscape and Visual Impact
- 2.10 Copies of the technical studies prepared as separate reports are appended to this Statement. A brief summary of the main points is set out below.

Highways

- 2.11 Our previous representations note that access to the site for the proposed use would not be suitable. The City Council's own assessment of 'long list' sites also concluded that the access to the Ringland Allotments was unsuitable. The site was, however, retained in the site selection process and subsequently included in the submitted LDP. The City Council's response to representations submitted to the Revised Deposit Plan stated that "*Highways have not raised the access to the site as a major obstacle*" (SD27).
- 2.12 After the site search and selection process had been concluded, the City Council instructed Capita to undertake a Transport Statement in relation to the proposed gypsy and traveller allocation at Ringland Allotments. The Transport Statement (November 2013) concluded that "*the local highway in the vicinity of the site is suitable with regard to capacity and highway safety and therefore, in principle, there are no highway reasons why the development should not take place*". The Statement, however, provided no details of how the access would actually operate – just that it would be taken from Cot Hill.
- 2.13 Given that the Transport Statement (November 2013) did not actually consider a detailed access design, our client has instructed consultants to prepare a site access appraisal for the proposed gypsy and traveller site at Ringland Allotments (see Appendix 1). The report considered two potential options, the first considering access to the site from Cot Hill via a new road junction. The second option shows access to the site from the A48 via a left turn lane / slip road.
- 2.14 The report concluded that the proposed Ringland Allotments gypsy and travellers site has a number of restrictions with regards to providing satisfactory site access. Several problems exist for both options in respect of the provision of adequate stopping distance. The site access layout demonstrates that there is limited space to locate a site entrance off the Cot Hill Junction. The A48 access would also be unfeasible due to the length of the proposed site and the location of Cot Hill Junction. The report concluded that it would not be possible to provide satisfactory site access to the proposed gypsy and travellers site in accordance with Gwent County Council Highways Design Guide for Residential and Industrial Estate Roads and TD 22-05: Layout of Grade Separated Junctions.
- 2.15 Further to the above report, our client also instructed a Road Safety Audit to consider the proposed access arrangements in more detail. The Audit considered access from Cot Hill given that this is the access arrangement considered by the City Council and that direct access off the A48 is not considered suitable or achievable. The Audit identified a number of serious issues with the safe operation of an access to the site from Cot Hill (see Appendix 2).
- 2.16 A separate technical report was also commissioned to assess the impact of the proposed gypsy and traveller site on highway capacity (see Appendix 3). The

assessment used data from the original Llanwern Village Transport Assessment and the Transport Statement produced by Capita. The results of the assessment show that the access to the proposed gypsy and traveller site would have significant implications for the operation of the Cot Hill / A48 junction such that capacity would be exceeded, extensive queuing would occur on Cot Hill and the southbound A48 approach and significant delays would be experienced by traffic moving through the junction. Without the proposed gypsy and traveller site and its access, the junction would continue to perform satisfactorily to 2026 and beyond.

- 2.17 The additional technical work undertaken goes beyond that previously carried out by, or on behalf of the City Council, as part of their site selection process. It clearly demonstrates that, as per the conclusions of the original 'long list', the site would not be suitable for use as a transit or residential gypsy and traveller site from a highways perspective.

Noise

- 2.18 The City Council has indicated that noise constraints could be addressed via a 2.5 m high attenuation fence at Ringland Allotments. No technical work has been included in the City Council's evidence base to demonstrate that this would provide acceptable mitigation. Our client has therefore instructed a detailed Noise Assessment relating to the allocation of the Ringland Allotments (see Appendix 4).
- 2.19 The Noise Assessment notes that the sound insulation of a caravan will be lower than that of a traditional dwelling. Caravan sound insulation can be up to 25dB Rw, depending upon the age, and construction method of the caravan. The Assessment, however, concludes that 15dB Rw is a more conservative figure. The Noise Assessment considered practical mitigation measures in the form of a 2.5m high close boarded fence along the northern, southern and western site boundaries.
- 2.20 Prediction calculations indicate that if the site was to be brought forward for either a transit or permanent residential gypsy and traveller site, with a 2.5m high noise attenuation fence, it would not be capable of achieving the external, internal daytime or internal night-time noise level limit. The technical work therefore concludes that Ringland Allotments is not considered suitable for use as a gypsy and traveller site with regard to road traffic noise. Higher fences would be required to achieve suitable external and internal noise levels on the site. Fences of up to 8m in height would be required, which would not be practicable or acceptable.

Power Lines

- 2.21 The City Council recognises that 132kV overhead lines cross the Ringland Allotment site, but maintains that this will not restrict the delivery of the proposed use. Our client has instructed technical work to consider the impacts of the overhead lines on the proposed development. The work identifies a series of constraints associated with the presence of the overhead lines.
- 2.22 The report notes that if removal or diversion is not feasible a "precautionary" offset should be applied to homes and a "physical" clearance to other buildings. Applying this data to the site crossed by the 132kV overhead line suggests the distance from the

overhead line where work should not be undertaken without approval and close supervision from the electricity company is likely to average 15 metres from centre line. The report also considers the recommended guidelines for distances from overhead lines for the building of new homes and schools published by the Stakeholder Advisory Group on ELF EMF (SAGE). The SAGE Report guidelines suggest no dwellings within 30 metres and the statistical association averaging 60 metres away.

- 2.23 The supporting towers should not have any construction carried out within 5 metres of the base of each tower, which are likely to measure 10 metres across, as this could impact on the ground support for the towers and impair their stability. Also applicable to the site is the restriction the overhead line has upon altering ground levels on site. Any work in proximity to the overhead line, such as increasing or decreasing ground levels, would need to comply with the Energy Network Association Standard 43-8 in maintaining 6.7 metres to ground level from the conductors when at maximum sag and swing. Additionally HSE Guidance Note GS6 will need to be followed in avoiding danger near overhead lines when using plant and machinery to ensure a safe working clearance is maintained at all times.
- 2.24 The technical work confirms that the presence of the overhead lines would impede the development of the site for the proposed use. This is illustrated in a plan attached to the technical report included at Appendix 5.

Topography

- 2.25 The site falls in a westerly direction towards the A48 dual carriageway. The topography of the site ranges from approximately 30m AOD on the eastern boundary to approximately 23m AOD on the western boundary, parallel to the A48 with a ground slope of approximately 1 in 10. This is considered too steep in its current form to accommodate any form of gypsy and traveller site.
- 2.26 The site would need to be re-profiled in order to provide a level plateau area for gypsy and travellers pitches. Ground levels adjacent to the existing pylon should also remain unaltered in order to ensure that the structure of the pylon is not undermined.
- 2.27 It is suggested that a site gradient of 1 in 100, falling east to west to allow for some drainage, and proposed embankment towards the A48 frontage at a 1 in 3 gradient for slope stability and planting maintenance, would be required. There is also a major gas pipeline that crosses the northern corner of the site, which is likely to require a 6m buffer distance without ground disturbing works and should be taken into account when reprofiling the site. The HSE 'Working safely near overhead electricity power lines' guidance states that the minimum height above ground level for an 132kV power line is 6.7m. The developable area following reprofiling and offsets relating to the overhead lines and gas pipeline would therefore be greatly reduced.
- 2.28 National good practice guidance in Wales also states that ensuring a degree of privacy is essential for site residents. The ground reprofiling is likely to result in plateau's ranging from approximately 26.5m to 30.2m AOD. The existing road level is approximately 23m AOD resulting in the proposed gypsy and traveller site being approximately 3.5m to 7.2m higher than the existing road. The creation of a gypsy and traveller site will have a significant visual/privacy impact on the properties that are

located to the west of the A48. The ground profiling does not provide an adequate degree of privacy for either the existing community or the proposed gypsy and traveller site.

Landscape and Visual Impact

- 2.29 Our client has instructed a Landscape and Visual Appraisal of the potential impact of the allocation (see Appendix 6). The Assessment concluded that the proposals will dramatically affect the recognised landscape elements of the land use, topography and built form. The allocation would therefore change the physical character of the eastern side of the A48. The proposals will also directly impact on the entrance to the strategic Llanwern Village development from the west.
- 2.30 The approved residential development at Llanwern Village is set to be away from the A48 and respects its associated buffer, which is in keeping with the existing character of the A48 corridor. This creates two different settlements. The principle of maintaining a continuity of greenspace between Hartridge and Scotch Woods was something specifically sought by the City Council during the development of the Llanwern Village masterplan.
- 2.31 The proposed gypsy and traveller transit and residential accommodation would undermine the principles previously agreed by introducing an urbanising feature that will merge the western residential suburb of Newport with the Llanwern Village development. This will have a negative impact on visual amenity, biodiversity and landscape along this section of the A48 corridor.
- 2.32 To the west open views will be possible to the noise attenuation fencing likely to be required along the A48 frontage. It is expected that the roofline of caravans, amenity buildings and other ancillary infrastructure associated with the site would also be visible from the A48. This would have an adverse impact on the visual amenity in this area, which will form the strategic gateway to the Llanwern Village development. It is assumed that open to partial views will also be possible from the upper floors of the western residential properties of the suburbs of Newport, above the existing noise attenuation fencing, where they are orientated towards the Ringland Allotments site.

What is the estimated capacity of the site (number of pitches)?

- 2.33 Given the various site constraints outlined above, the Ringland Allotments would not be capable of adequately delivering seven pitches gypsy and traveller pitches, either for transit or residential accommodation. When taken together the various constraints clearly demonstrate that the site is unsuitable for the proposed use and therefore would not be capable of satisfactorily accommodating any residential or transit pitches.

Is there a sound rationale for a) allocating the site on a contingency basis, and b) as either a residential or a transit accommodation site? Does this create excessive uncertainty and ambiguity?

- 2.34 As outlined above, the Ringland Allotment site is not suitable for the proposed use due to a number of site specific constraints. As such, there is no sound rationale for allocating the site for the proposed use on any basis. Notwithstanding this, it is also clear that there is no sound rationale for allocating the site on a contingency basis – for either residential or transit use.
- 2.35 In response to our representations to the Revised Deposit Plan, the City Council states that the Ringland Allotment site is one of three proposed gypsy and traveller sites “*which is required to meet the identified need*” and should therefore “*remain within the Plan in order to satisfy the requirement set out in National Planning Policy*”. There is, however, no justification to include the site within the LDP to satisfy national planning policy – even if the numerous site constraints did not render it unsuitable.
- 2.36 The requirement to provide gypsy and traveller sites in the emerging Newport LDP results from the policy and legislative background established by the Housing Act 2004, Welsh Assembly Government Circular 30/2007 (December 2007) and Planning Policy Wales (PPW) (November 2012). The Housing Act 2004 places a statutory duty on every local housing authority to carry out an assessment of accommodation needs of gypsy and travellers residing in, or resorting to, their district. The Act also requires the local authority that is the local housing authority to take the strategy into account in exercising their functions.
- 2.37 Circular 30/2007 identifies a requirement for local authorities to assess the level of accommodation provision required when preparing LDPs. The Circular also states that where there is an assessment of unmet need, local planning authorities must allocate sufficient sites in their LDPs to ensure that the identified pitch requirements for residential and transit use can be met.
- 2.38 Planning Policy Wales (PPW) (February 2014) supports Circular 30/2007, noting that local authorities are required to assess the accommodation needs of gypsy and travellers. It continues by stating that it is therefore important that local authorities have policies in their LDPs for this provision.
- 2.39 The identified need for permanent residential and transit accommodation in Newport was originally assessed as part of the Gypsy and Traveller Accommodation Assessment (January 2010). This identified a need for 29 additional to 2019 and 7 transit pitches. The Gypsy and Traveller Background Paper (June 2013) sets out an updated need (as of May 2013) of 43 residential pitches and 7 transit pitches over the plan period (to 2026).
- 2.40 Policy H15(i) of the Revised Deposit LDP allocates land at Celtic Way to accommodate the identified need for transit pitches (7 pitches), whilst Policy H16(i) identifies land at Hartridge Farm Road to meet the assessed need for permanent residential provision (43 pitches). The Delivery Implementation Table included in the Revised Deposit LDP confirms that the intention is to accommodate the identified transit need at Celtic Way and 43 permanent residential pitches at Hartridge Farm Road. Policy H15(i) and H16(ii)

therefore satisfactorily address the need (as identified through the City Council's evidence base) through the allocation of sites at Celtic Way and Hartridge Farm Road.

- 2.41 Given that the identified need is met by the allocated sites at Celtic Way and Hartridge Farm Road there is no justification for including Ringland Allotments as a contingency site for either transit or residential accommodation. The Delivery Implementation Table confirms that no pitches are actually identified for the Ringland Allotments site over the plan period.
- 2.42 There is no requirement in Circular 30/2007 or PPW to identify contingency sites in LDPs – merely to allocate sufficient sites to ensure that the identified pitch requirements for residential and transit use can be met. The Council has confirmed verbally that the Welsh Government has not requested inclusion of a contingency site in the LDP. The Revised Deposit Plan makes it clear that the allocated sites at Celtic Way and Hartridge Farm Road meet the entire assessed need for both transit and permanent residential accommodation over the plan period. As such, there is no requirement to identify a contingency site in the LDP for the plan to be considered sound.
- 2.43 The supporting text to Policies H15 and H16 state that the contingency site has been identified in the event that the identified need cannot be accommodated in its entirety on the preferred transit and residential sites. To be allocated in the LDP both Celtic Way and Hartridge Farm Road should have been subject to a robust assessment process to demonstrate that they are both capable of delivering the identified number of pitches. The Gypsy and Traveller Background Paper (June 2013) states that all three sites “*are considered to be deliverable...as well as being the sites that best meet the relevant guidance on site selection*”. Given that the City Council's own evidence base confirms that they consider both Celtic Way and Hartridge Farm Road to be deliverable there is no need to identify a contingency site.
- 2.44 Circular 30/2007 also requires local authorities to include criteria based policies within their LDPs in order to meet future or unexpected demand. A criteria based policy is set out in Policy H17 of the Revised Deposit Plan, which enables suitable proposals for gypsy and traveller caravan sites to be permitted. Should any additional need be identified over the plan period there is already a policy in place to address it – again meaning there is no sound reason for including the Ringland Allotments site as a contingency.
- 2.45 As demonstrated above, there is no sound rationale for including Ringland Allotments as a contingency site for gypsy and traveller use – either permanent residential or transit. In doing so, the plan will create unnecessary and excessive uncertainty and ambiguity. Unless subject to an early review, the land will remain allocated as a contingency site for the duration of the plan period. This will sterilise the site and have a negative impact on the delivery of the strategic housing allocation at Llanwern Village. This point is addressed in more detail below.

Can the site be satisfactorily developed for either alternative purpose (residential or transit) alongside the strategic housing allocation at Llanwern Village?

- 2.46 Our client maintains that the site cannot be satisfactorily developed for either residential or transit use alongside the Llanwern Village development. The proposed allocation

(whether or not it remains as a contingency or is actually brought forward) would have a negative impact on the delivery of the Llanwern Village development. This would have a detrimental impact on the delivery of the required number of new homes for Newport over the plan period – therefore conflicting with other policies in the LDP (e.g. Policy SP10). This would conflict with Test CE1.

- 2.47 As set out above, either a transit or permanent residential site would have significant implications on the operation of the revised Cot Hill junction. This junction will provide the main access to the Llanwern Village development and its satisfactory operation is therefore fundamental to the delivery of the scheme.
- 2.48 The allocation of Ringland Allotments will see the land sterilised for the duration of the plan period (or until a subsequent review), or enclosed by a substantial noise attenuation fence. This would not provide a suitable gateway to Llanwern Village. Through discussions with the City Council it was purposefully agreed that the Llanwern Village development would be set back from the A48 frontage, as reflected by the approved scheme. Introducing built development in this location would undermine the principles previously agreed with the City Council.
- 2.49 Under the terms of the S.106 Agreement attached to the extant outline planning permission relating to Llanwern Village, there is an obligation on the City Council to transfer Ringland Allotments to our client when they provide a new allotment site within the Eastern Expansion Area. Once our clients acquire the Ringland Allotment site it will be landscaped in order to create a gateway to the strategic housing development. The provision of an appropriate gateway to the Llanwern Village development is considered to be a key part of its overall marketability.
- 2.50 Our client has serious concerns about the potential impact of the allocation on the overall deliverability of the Llanwern Village development. Our client has sought the advice of a local firm of Chartered Surveyors to advise on the potential impact of the allocation on the delivery of the Llanwern Village development (see Appendix 7). The advice received confirmed that the general perception of the house buying public will be a prime concern for housebuilders contemplating development. The research undertaken on behalf of our client involved discussions with the six PLC housebuilders currently active in South Wales, together with a number of other regional housebuilders. Without exception, all of the housebuilders indicated that the proposed allocation would have a significant bearing on how they appraised Llanwern Village as a suitable development opportunity. Responses varied, with housebuilders at best stating that they would seek to factor in a significant discount to their figures in order to reflect the additional risk, whilst others stated that such an allocation would mean that they would not be interested in acquiring the site at all if the allocation was retained.
- 2.51 The Chartered Surveyors concluded that the allocation of a contingency site in this location would result in reduced selling prices but also a far slower rate of sale. This would clearly have a serious impact on the delivery of the Llanwern Village development, and its overall contribution to the wider housing delivery in Newport. Moreover, this impact is not justified or warranted given there is no requirement to identify a contingency site. The Planning Committee Report presented to Members on 4 December relating to the renewal of the outline planning permission noted that the

Planning Policy Manager considers Llanwern Village as “a vital part of the City’s housing commitment over the duration of the Newport Local Development Plan 2011-2026.” The allocation of Ringland Allotments would therefore directly conflict with the aims and objectives of the Revised LDP, including SP10, SP11 and H1.

- 2.52 Our client is firmly of the view that the proposed allocation, whether for a transit or residential site, could not be successfully brought forward alongside the Llanwern Village development. This is for both practical reasons, such as the impact on the operation of the new Cot Hill junction, and also the impact it would have on deliverability. Given the importance of the site to the overall housing strategy for Newport, this is a significant problem that would undermine the soundness of the plan (Test CE1).

How would the site be delivered, developed and managed? How would this be funded?

- 2.53 Delivery of the site is another significant constraint to bringing Ringland Allotments forward for either permanent residential or transit gypsy and traveller use. Circular 30/2007 states that local planning authorities must demonstrate “that there is a realistic likelihood that the specific sites allocated in LDPs will be made available for that purpose”. As has been made clear through discussions with the City Council the Ringland Allotment site will not be made available as a contingency site for gypsy and traveller pitches, either for transit or permanent residential use, over the plan period.
- 2.54 As the City Council is aware, under the Section 106 Agreement relating to the extant outline planning permission for Llanwern Village the land will be transferred in its entirety to our client. This position has been reinforced by the decision of the City Council’s Planning Committee on 4 December 2013 to retain the terms of the original S.106 Agreement when determining the s73 planning application to renew the outline permission. The site will therefore not be within the ownership of the City Council to deliver as a gypsy and traveller site. Our client has made it clear to the City Council throughout the site selection process that they have no intention of making the land available for the proposed use. Once the land passes to our clients it will form a landscaped gateway to the Llanwern Village development.
- 2.55 For the City Council to deliver the proposed use at the Ringland Allotment it would therefore be necessary to pursue alternative means of purchasing the land. The only potential route being Compulsory Purchase. This would be a costly and time consuming process that would clearly impact on the delivery and viability of delivering the proposed use. It would also indicate that the site would not be capable of meeting any of the immediate need identified.

3. Conclusions

3.1 In summary, the proposed allocation at Ringland Allotments is not considered to be sound, and should therefore be deleted, for the following reasons:

- The City Council does not have a robust evidence base to support the identification of Ringland Allotments as a contingency site for gypsy and traveller use.
- There is no requirement to identify Ringland Allotments as a contingency site in order to meet the identified need – which is already adequately met within the Revised Deposit Plan.
- The site is subject to a number of site specific constraints that mean it is not suitable for use as a gypsy and traveller site (either residential or transit) and would be contrary to national good practice guidance.
- The site will not be within the ownership of the City Council and is not available for the proposed use. The delivery of the site will therefore be reliant on a costly and time consuming Compulsory Purchase Order.
- The proposed allocation would have a significant impact on the delivery of the strategic housing allocation at Llanwern Village (whether it remains a contingency or is actually brought forward). This will undermine the overall housing delivery of the LDP.

Appendix 1: Site Access Appraisal

Appendix 2: Stage 1 Road Safety Audit

Appendix 3: Technical Memorandum – Junction Operation

Appendix 4: Noise Assessment

Appendix 5: Precautionary Approaches to Power Lines and Residential Land

Appendix 6: Landscape and Visual Appraisal

**Appendix 7: Rawlins & Madley Advice re:
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5/6 High Street
Cardiff
CF10 1AW

T 029 2034 4445

Turley