

**CARMARTHENSHIRE
REVISED LOCAL DEVELOPMENT PLAN (2018-2033)
EXAMINATION**

SCHEDULE OF MATTERS, ISSUES AND QUESTIONS

Matter 3: Prosperous people and Places – Affordable Housing and Gypsy and Traveller Provision

Issue - Are the requirements for affordable housing and Gypsy and Travellers accommodation supported by robust and credible evidence and consistent with national policy? and will they be met during the Plan period?

Affordable Housing

1. Is the Local Housing Market Assessment for Carmarthenshire (LHMA) based on robust and credible evidence? And are the findings sufficient to inform the Plan's affordable housing strategy?

Carmarthenshire's previous LHMA was published in Autumn 2020, as part of a consortium with 5 other neighbouring unitary authorities as well as Brecon Beacons and Pembrokeshire Coast National Parks. The work was carried out by ONS, supervised by a steering group with representatives from each authority.

The LHMA drew upon a range of socioeconomic demographic and property market data in order to provide detailed insights into the mechanics of the local housing markets. The Assessment analysed the latest data from the housing register, homelessness presentations, trend based social lets, committed affordable housing supply, housing stock, house prices, private rents, household income and household projections.

Welsh Government Guidance was closely followed to identify the annual level of housing need across Carmarthenshire in numeric and spatial terms, with the county divided into four action areas which closely follow the Affordable Homes Delivery Plans, and the evidence presented within the Financial Viability Report (CSD31 and CSD32).

Reference is drawn to the 2024 LHMA (a copy of which is attached) which has been published since the submission of the Revised LDP to PEDW with updated figures being presented to the examination.

Since the report of the Affordable Housing Review in 2019, the methodology to undertake a LHMA has been updated to ensure that all local authorities' assessments are carried out on a similar basis. This 2024 LHMA provides an updated position on the housing market, and the housing need figures are

calculated from the WG sub-national projections, in addition to the Council’s preferred household projection (8,822 dwellings over the plan period).

The LHMA forms a core piece of baseline evidence and has duly influenced the scale, type and location of growth within the Revised LDP.

a) What scale of housing need has been identified in the LHMA?

The published 2020 LHMA calculated a total housing need of 9,807 dwellings during the plan period 2018-2033, with 77% for open market tenures with the remaining 23% in affordable tenures. This was highlighted within the Deposit LDP and was the most up to date information at the time.

The output figures from the 2024 LHMA are not directly comparable with those in the 2020 LHMA, however it considers the average annual additional housing need for the period 2022 – 2027, and utilises the WG 2018 sub-national projections, in addition to the Revised LDP preferred growth scenario.

Figure 10

Average annual additional housing need 2022 to 2027	Projections compared			
	Lower	Principal	Higher	CCC
Owner occupier	29	73	107	151
Private rented	27	68	99	134
Low cost ownership	220	230	238	250
Intermediate rented	605	612	618	626
Social rented	379	427	427	513
TOTAL	1260	1411	1528	1674

Based on the 2024 LHMA the housing need for Carmarthenshire is 1,674 dwellings per year.

However, it is important to emphasise that this identified need should not be considered a delivery target or even the sole solution to the affordability issues within Carmarthenshire through the Revised LDP. It instead indicates the scale of housing need within the county, which the Council will seek to address through a range of market interventions as far as practically possible. The Revised LDP is one of several affordable housing delivery mechanisms and its contribution towards this total need has been informed by robust plan-wide and site-specific viability assessments.

b) What mix of tenure (e.g intermediate or social rented) and of dwelling type (bedroom size) are required?

Reference is drawn to figure 18 and 19 of the LHMA Position Statement (Submission Document CSD65) which provides an updated position on the annual additional need estimates by tenure.

Figure 18: Annual Additional Housing Need Estimates by Tenure – All Tenures – 2024 to 2027 (based on Carmarthenshire County Council household projection).

Housing Market Area	Owner occupier	Private rented	Low cost ownership	Intermediate rented	Social rented	TOTAL
Ammanford and the Amman Valley	44	43	40	98	100	325
Carmarthen and the West	40	42	57	136	115	389
Llanelli and District	63	49	128	330	271	842
Rural Carmarthenshire and Market Towns	4	5	23	60	26	118

Source: Carmarthenshire County Council / Welsh Government LHMA Tool

Figure 19: Annual Additional Need for Social Rented, 2024 to 2027, by number of bedrooms (based on Carmarthenshire County Council household projection).

Housing Market Area	One bedroom	Two bedroom	Three bedroom	Four + bedrooms
Ammanford and the Amman Valley	59	22	15	4
Carmarthen and the West	57	33	19	6
Llanelli and District	151	72	32	17
Rural Carmarthenshire and Market Towns	15	6	3	2
Total	282	133	70	29

Source: Carmarthenshire County Council / Welsh Government LHMA Tool

Figure 18 identifies the breakdown of the additional need by tenure within the affordable housing action areas. The requirement for social rented is higher in the Llanelli area (271 dwellings per year) for the period 2024-2027 with Ammanford and Amman Valley, and Carmarthen and the West requiring 100 dwellings and 115 additional dwellings respectively. In total, the annual need for social rented dwellings within the county is 512 dwellings.

When broken up by the number of bedrooms set out in Figure 19, there is a significant requirement for one- and two-bedroom social rented units within the county. One bedroom need equates to almost 55% of the total social rented need with the Llanelli and District Action Area representing 29% of all need.

c) **Will the affordable housing target of 1,900 dwellings meet the local housing need, if not what other mechanisms are available?**

Reference is drawn to the Growth and Spatial Distribution Topic Paper – Part 1 (Submission Document CSD74) which seeks to breakdown the components of supply to maximise the delivery of affordable housing. These include

- The sites included within Policy HOM1 of the Revised LDP. The affordable housing targets are based on site size (as evidenced from the Financial Viability Report submission documents CSD31 and CSD32), with the threshold for on-site contributions being 10 dwellings. Sites defined as allocations (without permission) are set against the policy target set out in Policy AHOM1 and sites with planning permission or those built will be counted against the contributions set out in their S106 agreements.
- Windfall - An allowance is being made for affordable housing which could be developed from large windfall sites.
- Local Needs, key worker dwellings, or One Planet Developments

The overall affordable housing target has now been refreshed post Deposit LDP and presented to the examination hearing as such. This has been undertaken by taking account of two further AMR periods, in addition to the calculations from the 2024 housing trajectory. The following table provides the following breakdown of the components of housing supply.

Components of Housing Supply	Housing Numbers
Policy HOM1 sites	1,622
Large windfall sites	166
Local Needs Dwellings	142
Total	1,930

While the Revised LDP will not meet the full extent of housing need identified in the LHMA, it is ultimately only one source of affordable housing supply. Delivery of the remaining need for affordable housing (identified in the LHMA) will be enabled through a range of other mechanisms. Reference is drawn to the Housing Regeneration and Development – Four Year Delivery Plan (submission document CSD39b). The mechanisms include Social Housing Grant, alternative capital/revenue grant funded schemes, RSL self-funded schemes, reconfiguration of existing stock, private sector leasing schemes, discharge of homelessness duties into the private rented sector, RSL acquisitions, private equity investment and re-utilisation of empty properties.

These mechanisms are outside the scope of the Revised LDP itself, especially considering that past availability of capital funding (notably Social Housing Grant) does not provide a robust indication of the future availability of funding over the plan period. On this basis, no further allowance has been made to factor in such alternative affordable housing delivery mechanisms at this stage.

2. Is the Financial Viability Assessment based on robust and credible evidence?

Yes, reference is drawn to Submission Document CSD31 and CSD32 relating to the initial Financial Viability Report from December 2022, and the subsequent updated / addendum report in May 2024.

The Study responds to the guidance in the Development Plans Manual, which requires a Local Planning Authority (LPA) to undertake a high-level viability appraisal to assess the broad levels of development viability in different housing market areas, which could result in a range of affordable housing percentages being sought across the LPA area.

The Study has drawn on market evidence of house prices from a range of development sites across Carmarthenshire. For development costs, the Study relies on a series of Viability Study Group sessions that have taken place across South Wales; evidence from viability assessments that have been undertaken for specific Development Management cases; as well as data from the Building Cost Information Service (BCIS).

Reference is also drawn to the affordable housing viability workshop which took place in September 2023 (submission document CSD33) to supplement the previous evidence considered to inform the Financial Viability Report. This evidence and values were also used to consider specific viability information for sites defined as 'key sites.'

a) Does the study's methodology take account of variations in building costs, planning obligations, sustainable urban drainage systems, fire safety measures and other associated requirements?

Yes, both the initial high level appraisal study and the 2024 addendum sought to factor in appropriate values for build costs and evidenced from a number of different sources. Various views were expressed on construction costs at the Viability Study Group in September 2023 (submission document CSD33) however no firm consensus was reached. However, in setting these rates for the purposes of this Review of the previous High-Level Viability Assessments, BHL – who completed the high level studies - also had regard to rates used in viability assessments submitted with candidate site proposals in neighbouring counties and settlements reached in development management cases where viability had been an issue.

Reference is also drawn to the evidence presented which relates to the additional Building Regulations requirements in Wales, which are not currently reflected in the more general BCIS cost rates drawn from the UK as a whole.

Additional sensitivity testing was also conducted based on changes in construction costs (housing and physical infrastructure), open market house prices and land prices (plus associated costs). The outcomes of these sensitivity tests are highlighted within Appendix C and D of the Addendum Report to illustrate how potential variations in certain components can impact upon the surplus or shortfall on target profit.

3. Is the affordable housing target of 1,900 dwellings in Policy SP5 realistic and based on robust evidence and been clearly expressed in the policy?

Reference is drawn to answer 2 (c) above. It demonstrates the level of affordable housing contribution which can be secured through the planning system. A re-evaluation has taken place since the publication of the Deposit LDP with a further two years of planning permission and housing completions data being considered for Policy SP5. The target is set at 1930 dwellings. This target is realistic and based on robust evidence.

In respect of the expression of the target within Policy SP5, the Council would consider the amendment to the policy to state:

The Plan will maximise the delivery of affordable homes up to 2033 through the provision of a target of 1,930 affordable homes. This will support the development and enhancement of sustainable, balanced communities.

4. How have the affordable housing targets and threshold in Policy AHOM1 been defined?

Reference is drawn to Chapter 4 of the High-Level Viability Assessment Report (submission document CSD31) which sets out the background of utilising various outputs to support the delivery targets set out with Policy AHOM1.

The Study focused on the high-level assessment of various site typologies; ranging from the development of single plots to developments of up to 10 dwellings – and of other small, medium and larger sized development scenarios – in order to provide a general indication of the levels of affordable housing and other s.106 obligations that ought to be viable in a variety of locations and market areas across the County.

For practical reasons, the high-level viability assessment of each typology was based on a set number of dwellings within the range specified for each typology.

The results from these high-level viability assessments, summarised in Appendix E of the 2022 report were used to inform the target percentages of affordable housing

that it should be viable to deliver on sites across the County, encapsulated in Policy AHOM1 of the Deposit Plan.

Furthermore, the 2024 addendum report reviewed and updated the 2022 study to reflect changes in development costs and property values. The report also took into account the increase in transfer values for affordable homes which were considered necessary in Carmarthenshire, which has further supported the viability of new housing development in the main.

a) Is the threshold of 10 units or more for on-site contributions realistic and based on robust evidence?

Yes. In considering the development cost and values highlighted within the report, and those considered at the viability workshop, reference is drawn to the conclusions set out within the 2022 and 2024 High-level viability assessments.

'It was further concluded from these high-level assessments that the percentage of on-site affordable housing that would be viable on sites of less than 10 dwellings, would yield very little in terms of the number of on-site affordable homes; a site of 8 or 9 new dwellings might yield at most one affordable home. It was therefore decided to make a policy shift towards sites of less than 10 dwellings (rather than the current threshold of 5 units) making financial contributions to provide affordable housing off-site; with the on-site provision of affordable homes being limited to sites of 10 dwellings or more.'

b) Is the requirement for 25% affordable housing on sites of 101 dwellings justified and based on robust evidence?

Yes, as discussed previously, the affordable housing targets have been subject to a rigorous assessment through the 2022 and 2024 viability assessments. Whilst there is a shortfall within the profit margin of development within the Llanelli Affordable Housing Action Area, the high-level nature of the assumptions made in this Study showed that a surplus or shortfall within £1,500 per dwelling and/or £15psm is considered to meet the test of viability. Furthermore, discussions can take place at a planning application stage to identify suitable affordable housing provision which allows development in this area to remain viable.

Reference is drawn to the evidential work undertaken on key sites within the 2024 addendum (submission document CSD32) which considers that sites of more than 101 dwellings should have no fundamental concerns about their viability.

c) How will the affordable housing target be delivered?

Please see the answer to question 1 (c).

The affordable housing target will primarily be delivered through Policy HOM1 allocated sites, and existing sites with planning permission that already form part of the housing land bank.

It is considered that on-site provision to be the optimal means of delivering affordable housing to foster sustainable, balanced, mixed-tenure communities across the County. Off-site provision and/or financial contributions will only be accepted in lieu of on-site provision in exceptional circumstances.

A number of affordable units will be expected to be delivered on large windfall sites, with commuted sum contributions playing a role in the delivery of smaller sites through various mechanisms.

e) Should matters in relation to negotiations, adjacent / related sites, perpetuity and commuted sums be relocated to the reasoned justification?

It is considered necessary for the policy on commuted sums (1-9 dwellings) to remain within the policy in order to provide clarity on developments of under 10 dwellings where a commuted sum is necessary.

The remaining text relating to negotiations, adjacent or related sites and matters of affordable housing remaining in perpetuity could be relocated to the reasoned justification if deemed appropriate.

5. How will off-site or commuted sum contributions for affordable housing be secured and managed? What mechanisms are in place to ensure that the level of contributions sought are appropriate?

Off-site or commuted sum contributions for affordable housing will be secured through s106 agreements and managed via appropriate s106 triggers for payment. All S.106 Agreements are registered as land charges and compliance monitored by the authority's Planning Obligations Monitoring and Implementation Officer. The expenditure of commuted sums is overseen by the S.106 Working Group which includes representation from the Council's Planning Team, Legal Services and Housing Department. This ensures that the commuted sums are spent in accordance with the terms of the relevant S.106 Agreements while also maximising the opportunities to meet the local identified housing need.

An Affordable Housing SPG will be adopted in conjunction with the Revised LDP which will identify the mechanisms for securing an affordable housing contribution.

6. Is the spatial distribution of affordable housing sound and does it adequately reflect local needs?

The location of affordable housing need set out within the LHMA was a key consideration in the development of the spatial strategy, with the most need identified within the Llanelli, Ammanford / Amman Valley and Carmarthen Affordable Housing Action Areas. The spatial strategy therefore sets a strong relationship between proposing development (as identified through Policies SP1 and SP4) and the majority of development being allocated to the Principal Centres where the affordable housing need is most required. The growth strategy allows for the development of a mix of house types to be built in sustainable locations to meet the needs of local residents as highlighted within the LHMA.

7. Are the requirements of Policy AHOM2 clearly expressed and consistent with national planning policy?

Yes, the policy sets out clear criteria which proposals must accord with to be deemed suitable 'exceptions' as required by paragraph 4.2.35 of PPW (ed.12). The supporting text to the policy elaborates on the criteria noting the need for affordable housing to remain affordable to meet future needs.

An Affordable Housing SPG will be adopted in conjunction with the Revised LDP to elaborate on the implementation of the Policy and the criteria therein.

Gypsy and Traveller Accommodation

8. Is the Gypsy and Travellers Accommodation Assessment (GTAA) based on robust and credible evidence and sufficient to inform the Plan's strategy?

The 2019 GTAA was undertaken in the Summer / Autumn of 2019 and submitted to the Welsh Government for ratification.

It was completed following WG guidance and is based on robust and credible evidence, having utilised a combination of desk-based research, stakeholder engagement and field survey work to engage with Gypsy and Travellers within the county. It is considered that the GTAA provides a detailed understanding of the accommodation needs of the Gypsy and Traveller population which informs the requirement for additional pitches over the plan period.

a) What is the status of the most recent GTAA?

The Local Authority undertook a GTAA in 2019 which identified the current and future provision of gypsy and traveller pitches within the County.

Although the Council has submitted the GTAA in accordance with s102 of the Housing (Wales) Act 2014 no formal resolution was received by the Welsh Government. Reference is drawn to the Position Statement on the Gypsy and Traveller Accommodation Needs Assessment (submission document CSD63) relating to the Council's current position. The statement also notes WG's position regarding their notice on reviewing their GTAA methodology, which has impacted the Council's ability to undertake an updated assessment.

b) How many new permanent Gypsy and Traveller pitches are needed over the Plan period? And how will this need be met?

The 2019 GTAA identified the current and future provision of gypsy and traveller pitches within the County. The additional pitch need was considered for three-time periods.

Gypsies and travellers as of 2019:

Unmet need: 19 pitches

Likely unmet need in 5 years: 23 pitches

Likely unmet need in 2033: 31 pitches

Travelling Show People - Additional pitch needs as of 2019

Unmet need now: 4 pitches

Likely unmet need in 5 years: 4 pitches

Likely unmet need in 2033: 6 pitches

The need will be met through the allocation of land identified within the Revised LDP and through Policy GTP1 which provides a criteria-based policy for the development of Gypsy and Traveller proposals.

9. Are the requirements of Policy SP10 clearly expressed and consistent with national planning policy?

Reference is made to paragraph 4.2.36 of PPW (ed.12) which requires local authorities to assess the accommodation needs of Gypsy and Traveller families and to allocate sites to meet the identified needs. As stated above, the Council has undertaken a GTAA to identify the need in the County. Consequently, a number of sites were appraised using a site assessment methodology (CSD118) and these two sites were deemed most appropriate to meet the identified need and allocated accordingly.

a) How many new pitches will be provided on the Land at Penyfan, Trostre, Llanelli and Penybryn (Extension) Bynea, Llanelli sites?

Please see answer to question 11 below.

10. Does Policy GTP1 provide a clear and consistent framework for assessing proposals for additional Gypsy and Travellers sites, and is it consistent with national policy?

Please see response to Q.9 above as well as Submission Document CSD118.

11. Are the Gypsy and Traveller sites allocated under Policy SP10 at Land at Penyfan, Trostre, Llanelli and Penybryn (Extension) Bynea, Llanelli sound and capable of being delivered during the plan period?

Allocated Sites	PrC2/GT1 - Land at Penyfan, Trostre, Llanelli PrC2/GT2 - Penybryn (Extension) Bynea, Llanelli
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Land at Penyfan, Trostre

a) What are the current uses of the allocations?

Vacant and Disused rugby pitch

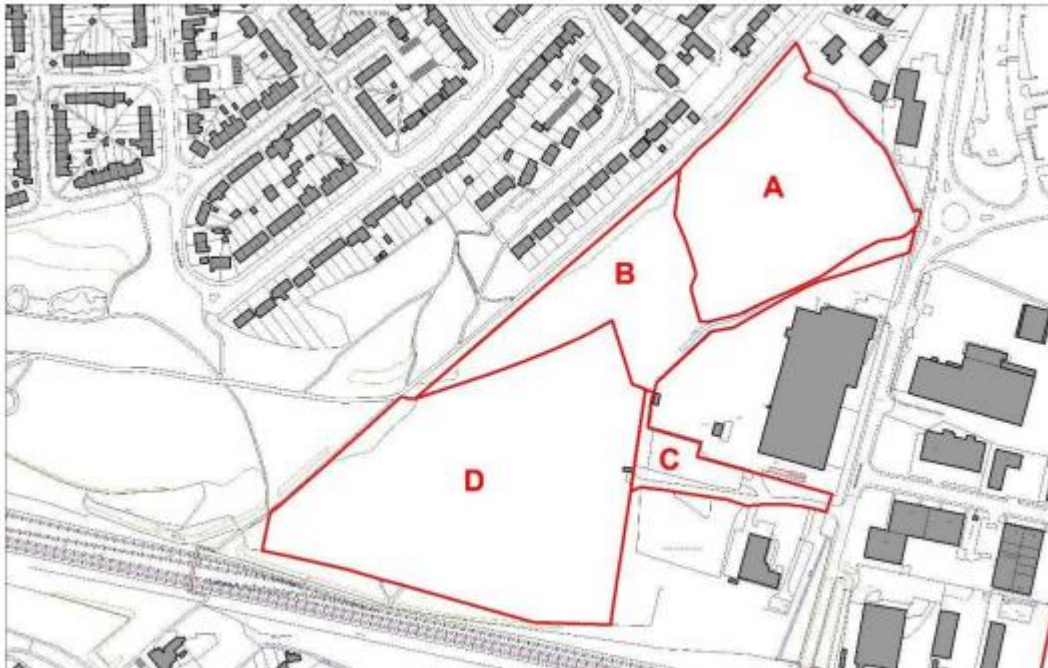
b) What is the proposed use of the allocation?

Gypsy and Traveller accommodation

c) What are the constraints affecting the sites, and are these constraints significant obstacles to development within the Plan period?

Reference is drawn to submission document CSD118 which relates to the site assessment methodology and the consideration of sites within the Council's landholdings.

The site is located immediately adjacent to the rear of Trostre Depot and is a parcel of vacant land naturally regenerated to shrub. To the north of the site, a public footpath runs from a northeast to south west which separates the site from Heol Gwyr and steeply sloping recreation land within Penyfan.



The allocation of the Gypsy and Traveller site is contained within sections B and D.

Area B and C are owned by the Local Authority. Area B is an irregular parcel of land behind Trostre Depot and measures 0.85ha. Area C is the access point between Trostre Depot and the Lord Arthur Rank Centre.

Area D is within private ownership and is identified as disused recreational land, although it is overgrown and not maintained to allow any recreational and sporting use. This land was previously within Council ownership prior to its sale. This land measures 2.9ha in size and it relatively flat in nature.

Constraints

Flooding

Reference is drawn to the flooding evidence set out within the Inspectors Initial Questions which considers the whole allocation area. Approximately 1% falls within the NRW Flood Zone Rivers (zone 2). Approximately 75% falls within Flood Zone 2 and 3 (Tidal). Those elements of the site fall within the TAN15 Defended Zones. Approximately 5% falls within NRW Surface Water and Small Water Courses (zone 2&3).

The areas of the site that fall within NRW flood Zone 2 (rivers and Tidal) and zone 3 (tidal) also fall within TAN15 Defended Zone. Any planning application in relation of the site will be required to have regard to the FMfP. Reference is drawn to the evidential work undertaken as part of the SFCA (submission document CSD226)

The surface water and small watercourses implications will be considered at a planning application stage with the approach and information required dependent on the nature of the flood risk. It may include integration of design and layout solutions, submission of a FCA potentially demonstrating a sequential approach with the highest vulnerability uses at the lowest risk of flooding and modelling of the watercourse where appropriate.

Coal Mining

The site appears to be within / adjacent to a High-Risk Development Area in association with historic coal mining activity which is not uncommon for the Llanelli area. A planning application may need to be informed by a Coal Mining Risk Assessment.

Contaminated Land

Further consideration may need to be given at a planning application stage to previous workings on the site including the potential impact of contaminated land.

Ecology

Further consideration would need to be given to ecological and habitat surveys within the site. There has however been no objection from NRW.

d) Are the number of pitches proposed realistic and deliverable over the Plan period?

Reference is drawn to the position statement relating to the GTANA 2019 and the identified need set out within. Reference is also drawn to the Welsh Government's notice on reviewing their GTANA methodology.

The 2019 study identifies the unmet need of 19 pitches in 2019, 23 pitches by 2024 (5 years) and 31 pitches by the end of the plan period in 2033. An update to identify the additional need has not taken place given WG advice.

The position statement refers to several planning permissions for new G+T pitches within the county. Since the 2019 GTANA 27 pitches have been granted planning

permission on private sites including 5 tolerated pitches being granted planning permission.

The allocation of the site has been through an extensive sieving exercise with various options on the site. The options consider the development of Local Authority land only, with an indicative site layout showing up to 7 potential pitches.

The exercise also showed various options to include 3rd party land and the potential re-configuration of other uses. This is dependent on the Local Authority to be able to purchase land. The sieving exercise and the configuration of the site identifies the potential for 16 pitches. At this point, whilst initial considerations have been given to the purchase of this additional land there are no ongoing discussions taking place.

Given the planning permissions on private sites within the county, and particularly those within the Llanelli area it is considered that the land within the ownership of the local authority can support in meeting the additional needs and be delivered within the plan period.

e) What are the mechanisms and timescales for delivering the sites?

The Council would seek to deliver any proposed scheme utilising funding streams available to the authority along with any other capital available from within the Council 's financial provisions. It is noted that the proportion of the site at Penyfan is within council ownership.

Further to the publication of a future GTANA given the nature of Gypsy and Traveller provision identified since the 2019 study, the Council will seek to provide the required pitches following the publication of an updated study. Nevertheless, it is identified that any provision for Gypsy and Traveller can be undertaken through planning policy GPT1 which allows the development of pitches via criteria-based policy.

f) Are the allocations essential to ensure the soundness of the Plan?

No. Reference is drawn to the availability of private sites identified within the position statement which can meet a significant amount of the additional need highlighted within the GTANA. Reference is also drawn to national planning policy and the Revised LDP policy to allow proposals for new gypsy sites, or extensions to authorised sites.

PrC2/GT2 - Penybryn (Extension) Bynea, Llanelli

a) What are the current uses of the allocations?

Vacant / shrubland

b) What is the proposed use of the allocation?

Extension to the Gypsy and Traveller site at Penybryn.



c) What are the constraints affecting the sites, and are these constraints significant obstacles to development within the Plan period?

Reference is drawn to the flooding evidence set out within the Inspectors Initial Questions. Approximately 10% falls within the NRW flood zones 2 & 3 (tidal) and that element of the site falls within the TAN15 Defended Zones. Any planning application in relation of the site will be required to have regard to the FMfP and be supported by appropriate evidence. Reference is drawn to the evidential work undertaken as part of the SFCA (submission document CSD226)

There are no further identified constraints relating to the site. Further consideration would need to be given to ecological and habitat surveys within the site. There has however been no objection from NRW.

d) Are the number of pitches proposed realistic and deliverable over the Plan period?

The small-scale nature of the proposed allocation is appropriate for its location particularly as an extension to the existing Gypsy and Traveller site and compatibility of similar family units at Penybryn. Based on the density of the existing Penybryn site and considering Welsh Government Guidance on designing gypsy and traveller sites it is estimated that the extension could accommodate between 4-6 pitches.

e) What are the mechanisms and timescales for delivering the sites?

The Council would seek to deliver any proposed scheme utilising funding streams available to the authority along with any other capital available from within the Council financial provisions. It is noted that the whole site in Penybryn is within council ownership.

Further to the publication of a future GTANA given the nature of Gypsy and Traveller provision identified since the 2019 study, the Council will seek to provide the required pitches following the publication of an updated study. Nevertheless, it is identified that any provision for Gypsy and Traveller can be undertaken through planning policy GPT1 which allows the development of pitches via criteria-based policy.

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No. Reference is drawn to the availability of private sites identified within the position statement which can meet a significant amount of the additional need highlighted within the GTANA. Reference is also drawn to national planning policy and the Revised LDP policy to allow proposals for new gypsy sites, or extensions to authorised sites.