







and developer profit is more appropriate for the industry to comment on, not Welsh Government.

**e) Are the requirements of Policy HN3 clear, and consistent with national policy?**

The Welsh Government has no concerns in this respect.

**f) Is the spatial distribution of affordable housing sound and does it adequately reflect local needs?**

See previous comments on the clarity of affordable housing in spatial terms. The relationship to this distribution of housing and the level of need will be for the LPA to explain.

**g) 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 sufficiently**











### Additional comment regarding the need for delivery/monitoring indicators

The Welsh Government considers that the plan would benefit from and should include more robust/refined monitoring indicators relating to the specific allocations, akin to other adopted plans in Wales. **Each gypsy and traveller site allocation should have a specific indicator, with key milestones and triggers for delivery set out** in the monitoring framework, i.e. dates for securing planning permission, dates for grant funding etc. (if appropriate) set out in advance of 2030. This will ensure the Council is committed to a timescale for addressing any constraints and the sites can be delivered in the identified timescales.

#### **h) Does Policy HN9 provide a clear and consistent framework for assessing proposals for additional Gypsy and Travellers sites, and is it consistent with national policy?**

Criterion a) and b) of Policy HN9 and the reasoned justification in paragraph 11.37 are contrary to national policy. Annex B in the Circular notes that policy requirements