1. Housing Requirement – is there a sound rationale for the identified housing requirement of 10,350 new homes over the plan period?

Redrow Homes support the housing requirement of 10,350 new homes over the plan period which aligns the housing and economic policy objectives of the LDP which support growth. A growth strategy based on an increase in the number of jobs of 7,400 new jobs over the plan period is reasonable and provides a rational basis for departing from the 2008 and 2011 WG Household Projections.

2. Spatial Distribution of Housing Provision and Site Selection

- What rationale underpins the Plan’s approach to the spatial distribution of housing provision over the plan period? What factors have been balanced in coming to this view?

The spatial distribution of housing development is determined by the brownfield led strategy which assumes that brownfield sites are more sustainable and should be developed first. As a consequence proposed residential development is concentrated in those areas where there is brownfield land with 84% of the allocations in the east and central areas and only 16% in the west.

- Is there a sound rationale for the level of reliance on brownfield land to deliver the housing requirement?

The over reliance on brownfield land will not allow the housing requirement to be delivered because there is an over-concentration of land in a relatively small area which provides an insufficient range and choice of sites and insufficient flexibility to allow for the non implementation of sites many of which have been identified in previous plans and have failed to come forward for development. The LDP annual housing requirement of 690 dwellings will require the average annual building rate achieved over the 1996-2012 period of 456 dwellings to be increased by over 50% per annum. There is no evidence that the annual build is increasing with 809 completions in the first two years of the plan period meaning that the annual residual requirement is now 733 dwellings per annum and will continue to rise as the identified sites do not deliver as anticipated.

- What evidence demonstrates that all housing allocations are soundly based on methodical, consistently applied, robust and objective site selection process, taking into account considerations concerning site suitability, availability and deliverability?

The continued concentration of the vast majority of housing sites in the central and eastern area of the City is a continuation of a strategy adopted in previous plans and includes many sites which have failed to come forward and will continue to be delayed in coming forward due to technical difficulties associated with flooding, decontamination, infrastructure requirements which affect the viability of sites. Owing to the high level of existing commitments there are only 9 new allocations and 5 of these have been identified in previous development plans. Insufficient consideration has been given to whether these sites will be delivered in the plan period.
• Do the housing allocations and policies provide a sufficient range and choice of housing sites and opportunities across the Council’s area, in locations consistent with the objectives of the plan? Is the plan sound as regards the approach taken to new housing provision in settlements outside the main Newport urban area?

The over-reliance on brownfield sites (82% of the allocations) together with the concentration of sites in the central and eastern parts of the City means that there is not a sufficient range and choice of housing sites throughout the Council’s area. It would still be possible to continue with a brownfield strategy but by reducing the emphasis of relying on such a high percentage of brownfield sites by allocating a limited number of sustainable greenfield extensions to the settlements outside the main Newport urban area which would add to the range and choice of sites and allow the growth objectives of the LDP to be achieved. The plan is not sound with regard to settlements outside the main Newport urban area because there is a need to allocate a range and choice of housing sites throughout the Council’s area to provide sufficient flexibility to enable the growth strategy of the LDP to be achieved.

• What risks or problems has the Council identified associated with the level of reliance of brownfield site – and how does the plan seek to deal with these?

It would appear that the Council do not accept that there are any risks with the level of reliance on brownfield sites as the LDP strategy is a continuation of the strategy of the UDP which has not delivered as was anticipated. The Council cannot rely solely on the economic recession alone to explain the non delivery of sites allocated in the UDP as many of the sites have been identified for a considerable period including periods of economic growth prior to the recent recession.

Chapter 12 provides a list of trigger points against LDP policies and in relation to housing delivery the first trigger point is delivering less than 3930 units (including 865 affordable units) over the 2011-2016 period. With completions of 809 dwellings for the first 2 years, 2011-2013, there is a residual requirement of 3121 completions for the 3 year period 2013-2016 or over 1000 per annum. The latest JHLAS indicates that there will be a significant shortfall in provision up to 2016 which will not be overcome by the allocated sites and it is inevitable that it will trigger a review of the plan. In the light of the available evidence it is not sound for the plan to proceed when it is inevitable that this first trigger point will not be met. Consideration should therefore be given to allocating additional greenfield sites now or at the very least identifying reserve greenfield sites which will be released to make up any shortfall in provision at the first trigger point.