NEWPORT LOCAL DEVELOPMENT PLAN EXAMINATION

RESPONSE TO MAIN DISCUSSION MATTERS FOR HEARING SESSIONS 2:
PROVISION FOR HOUSING

SUBMISSION BY GERAINT JOHN PLANNING LTD
ON BEHALF OF REDROW HOMES LTD (3985)

MARCH 2014
1.0 INTRODUCTION

1.1 This note is provided as supplementary evidence to the previous submissions made on behalf of Redrow Homes Ltd in relation to the Local Development Plan (LDP).

1.2 The focus of our comments relates to questions and issues raised by, and set out in, the Inspector’s Main Discussion Matters - as documented in the agenda to Hearing Sessions 2: Provision for Housing.

1.3 It should be noted that these representations do not respond to every question raised within the Inspector’s Agenda, as all of these questions do not necessarily have a bearing on our clients’ position and / or or earlier submissions made on behalf of Redrow Homes Ltd are considered sufficient to address the matters raised. Accordingly, these representations only provide responses to questions where it is considered necessary and relevant to do so.

1.4 Furthermore, there is considered to be considerable (inevitable) overlap between some of the issues raised within the main discussion matters provided within the agenda. Accordingly, only the key points / main issues are discussed in this submission.
1. **HOUSING REQUIREMENT - IS THERE A SOUND RATIONALE FOR THE IDENTIFIED HOUSING REQUIREMENT OF 10,350 NEW HOMES OVER THE PLAN PERIOD?**

   **Do the latest WG projections (expected end February 2014) necessitate any adjustment of the identified Plan housing requirement?**

From undertaking an initial review of the WG’s Household Projections (released 27th February 2014) it is clear that there is an increase in the expected population level within Newport, and also, by association, the level of additional housing households over the Plan period.

A comparison between the WG’s 2008 and 2011 household projections over the Plan period (i.e. between 2011 – 2016) is provided in the table below.

<table>
<thead>
<tr>
<th></th>
<th>Households</th>
<th>Additional Households</th>
<th>Population</th>
<th>Additional Population</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>at 2011</td>
<td>at 2026</td>
<td>2011 - 2026</td>
<td>at 2011</td>
</tr>
<tr>
<td>2008 Projections</td>
<td>61,008</td>
<td>68,144</td>
<td>7,136</td>
<td>139,218</td>
</tr>
<tr>
<td>2011 Projections</td>
<td>61,261</td>
<td>69,248</td>
<td>7,987</td>
<td>144,149</td>
</tr>
</tbody>
</table>

As the table confirms, the 2011 projections confirm that the population of Newport is expected to increase by an additional 15,361 people over the Plan period, in comparison to an increase of only 8,715 as per the 2008 projections.

Furthermore, in terms of household numbers, the 2011 projections confirms that there will be over 851 additional households over the Plan period, when compared to the 2008 projections. Accordingly, it is clear that despite the fact that the 2011 projections factor in a period of decline, the projections still envisage an even greater level of household numbers than those envisaged in the 2008 figures.

Having regard to this, it is clear that the housing requirement identified within the Plan needs to be increased in order to respond to the 2011 household projections – which provide the most up-to-date figures in this regard.

Any increase needs of course to be in addition to, over and above, any contingency allowance made to ensure deliverability.

2. **SPATIAL DISTRIBUTION OF HOUSING PROVISION AND SITE SELECTION**

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

It is considered that there is a fundamental issue in terms of the deliverability of the housing strategy as a result of the focus on brownfield sites. Brownfield sites, as previously developed sites, are likely to have greater site constraints with the potential need for site remediation works etc. Accordingly, brownfield sites can often have higher development costs and take longer to develop. Given the present economic climate there is a need for readily developable and economically viable sites to be identified.
It is evident that a number of Authorities within Wales have encountered considerable difficulties in delivering their housing requirement due to a focus and over-reliance on brownfield sites within their LDP’s.

Evidence of the failure of adopted LDP’s to actually yield and deliver the envisaged and required housing supply is no better exemplified than by the Rhondda Cynon Taf County Borough Council’s LDP. This Plan, despite having been relatively recently adopted in March 2011, has failed to ensure an adequate supply of housing land for the County Borough since its adoption.

This is highlighted within the most recent Joint Housing Land Availability Study published for RCT (2012 Study Report - December 2012) which records a housing land supply position of 4.5 years - below the required 5 year supply (even though the Plan is –only 2 years ‘old’).

The following extract from the 2012 RCT JHLAS is relevant:

"The adoption of the Local Development Plan (LDP) in 2011 resulted in the first major release of new housing land in Rhondda Cynon Taf in 30 years. Yet, the 5-year land supply was only 5.3 years in 2011, and one year on, is now below the required level of 5 years at 4.5 years"

In terms of the 'cause' of this undersupply, the following extract is relevant:

"This is partly a reflection of the proportion of brownfield land in the supply, where a longer lead-in time between planning permission and development is required to allow for remediation of the land. It is also partly a reflection of the difficult economic conditions that have persisted since 2008 in Europe, the UK and Wales. Whilst the situation is more stable than in 2008-2009, recovery appears to be inhibited by continuing economic uncertainty in the Euro zone"

Like the proposed Newport LDP - which is based on a number of large brownfield sites, the RCT LDP is heavily reliant on a small number of very large strategic, brownfield sites. Many of these have not come forward (at all or at a much slower rate than anticipated and needed). This therefore makes the case for additional housing allocations – particularly on greenfield sites to ensure that there is a ready supply of deliverable housing land to meet forecast demand requirements.

In any event, the persistent "difficult economic conditions" recognised by the 2012 RCT JHLAS, and identified by it as one of the causes for the under-performance of the RCT LDP is cause in itself to increase the contingency / flexibility allowance yet further.

This is further confirmed by the position of Caerphilly CBC, who despite having an LDP recently adopted in November 2010 (again based on a similar strategic site profile), have only a 3.5 year housing land supply (as per the November 2012 JHLAS). In view of this, the Council are now looking to undertake a review of the LDP to address the land supply issues and allocate new housing sites that are capable of being delivered – a position which has been endorsed by Members at Caerphilly’s Cabinet Meeting on 2nd October 2013 and Council Meeting on 8th October 2013. In particular, Caerphilly have recognised that their brownfield focussed LDP sites are not being developed at the expected rate, and accordingly, the allocation of additional greenfield sites will need to be considered - in recognition that these will provide deliverable sites that will likely attract house builders to the area, and will also potentially increase the delivery of affordable housing.
Accordingly, and in light of this evidence, in terms of the Newport LDP it is considered that an increased housing requirement, including suitable and deliverable greenfield sites, should be provided within the Plan in order to ensure that a range of deliverable sites are provided and brought forward. This will ensure that the lessons / experience of other LDP processes are heeded and that the pitfalls and mistakes that have been made are avoided and not repeated. This will ensure that the Newport LDP will be a robust plan that can meet the housing demands of the area and stimulate economic growth and prosperity.

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 plan overestimates the speed in which development can be brought forward on a number of brownfield sites, and does not allow for a range and choice of sites to come forward as and when they are required. Accordingly, it is our view that the proposed primarily brownfield strategy concentrating on large sites should be amended to include a number of appropriate greenfield sites that are able to come forward in a timely manner in response to market demands.

This will ensure that a range and choice of housing site and opportunities across the Council’s area are provided (in accord with PPW) – in order to ensure that the Plan is able to provide for the level of housing need identified, and also provide for different housing choices in a range of settings and locations – which is needed if the housing market is to function effectively.

What risks or problems has the Council identified associated with the level of reliance on brownfield sites – and how does the Plan seek to deal with these?

As outlined above, it is considered that the Council’s reliance on brownfield sites poses a number of considerable risks and problems.

In particular, the proposed strategy raises questions in regards to the soundness of the Plan having regard to the ability of the LDP to provide for required levels of housing need. In its current form, it is considered that the brownfield focus of the Plan will result in the Authority having difficulty maintaining a five year land supply due to deliverability issues – as has been witnessed across other Authorities within South Wales.

The recently announced uplift in population and household projections makes these risks even more acute.

3. LAND SUPPLY

What evidence demonstrates that the allocated sites are capable of yielding the identified housing target?

Questions are raised over the ability of a number of allocated sites to yield the identified housing target over the Plan period. It is considered that delays in bringing forward some of the proposed allocated sites will have significant negative implications on the ability of the Plan to provide the required level of housing provision.

In particular, it is considered that the LDP overestimates the number of houses that will be provided on a number of key strategic brownfield sites over the Plan period. Over confidence
in the rate of delivery on these sites is considered likely to result in a housing land supply issue for the Authority.

In particular, over the Plan period (i.e. 2011 – 2026) the Deposit LDP confirms that a total of 2997 dwellings will be brought forward on the Glan Llyn allocated site alone (site reference number: H47) – this is considered to be a significant overestimation of the level of development which will take place on the site.

This is demonstrated by current / expected levels of housing building on the site. The enclosed letter (see Attachment A) was provided by Persimmon Homes in regards to an appeal at Rogerstone, Newport. This confirmed that the first phase of the site allows for a total of 307 units, but that due to current market conditions and technical issues including substantial ongoing site preparation works, that they do not foresee the completion of the phase within a 5 year period. In particular, they confirm that a maximum of 275 units are expected to come forward on the site over the period 2012 – 2016, with a maximum of 65 completions per annum.

Whilst it is noted that during future stages additional house builders will be involved, it is considered that this demonstrates that levels of completions will not be as significant as expected by and provided for within the LDP.

Indeed, within Newport’s most recent published Joint Housing Land Availability Study (2012), the number of units to be delivered on the sites by 2015 has fallen dramatically in comparison to the 2010 JHLAS. In the case of Glan Llyn this has fallen to just 100 units from 575.

In view of this, it is considered that the delivery rates on Glan Llyn (site reference H47) should be significantly reduced in order to ensure that the Plan provides for a realistic rate of housing delivery over the Plan period.

Further compelling evidence and, ‘on the ground experience’ is provided by the Coed Darcy Urban Village scheme in Neath Port Talbot – which has failed to yield units at the expected rate and level. Overreliance on this site within the Plan process at Neath Port Talbot (and for that matter in recent Joint Housing Land Availability Study exercises – at least up until the latest 2013 version) has led to considerable difficulties and a now acute housing land supply shortage – Neath Port Talbot now having a 2.6 year supply according to the recently published 2013 JHLAS (published January 2014).

In order to compensate for delays in the delivery on such allocated sites, additional greenfield sites should be allocated in order to ensure that the Plan is able to provide for the required level of housing need and maintain a 5 year housing land supply.

In addition, and / or in the alternative (as a minimum), reserve sites should be identified which can be released for development should the strategic sites fail to deliver at the expected rates. Specific triggers can be provided which, when met, will automatically release the reserve sites and allow them to come forward for development. This will therefore ensure that the Plan is able to quickly and easily respond to changing situations, and ensure that the 5 year housing land supply is maintained throughout.

It is considered that the proposed alternative sites put forward by Redrow Homes Ltd on Land at Christchurch, Newport and on Land at Newport High School Old Boys Rugby Football Club, Caerleon provide two suitable options for potential additional or reserve site allocations – which can quickly and easily come forward for development to ensure that a sufficient housing land supply is maintained.