NEWPORT LOCAL DEVELOPMENT PLAN EXAMINATION

HEARING SESSION 3

HOUSING DELIVERY

STATEMENT SUBMITTED ON BEHALF OF REDROW HOMES LTD (134)

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March 2014

1. Expected Housing Delivery Rate

2. Evidence that the Plan's sites will deliver

Many of the sites identified in the LDP were included in the UDP and were subject to discussions about their deliverability during the Round Table Session on the UDP. The attached table (Table1) is an extract from the UDP Inspector's report (September 2005) which compares the anticipated contribution of sites in the UDP plan period up to 2011 with what the actual completion rates were in 2011 and 2013. The Council's estimated delivery rates which were more or less endorsed by the UDP Planning Inspector were proved to be substantially below actual completions.

There is therefore a history of sites not delivering as anticipated which is of concern as many of the sites included on the attached table have been carried over into the LDP.Many of the sites have been identified for a considerable period during periods of both economic recession and growth and it is therefore not sound to continue rely on them to deliver the required housing during the LDP period.

The UDP also assumed that the Eastern Expansion / Llanwern Steelworks (EEA) would deliver 1700 dwellings by the end of the UDP period in 2011. There were no completions in the UDP period and whilst construction has now started on the former Llanwern Steelworks there are still no completions on the northern part of the expansion area. The LDP assumes that there will be over 4000 completions from the sites within the EEA over the LDP period which assumes a delivery rate which cannot be achieved. The attached table sets out a more realistic trajectory of the likely completion rates from sites within the EEA which has been agreed with the HBF and other objectors (Table 2).

The trajectory shows that the annual average requirement from the EEA is 280 completions per annum and with the under provision in the first two years of the plan period has risen to over 300 per annum. On the basis of a more realistic assumption of the EEA delivering 180 completion per annum the trajectory identifies a shortfall of over 2000 completions over the plan period. There is only one major house builder operating on the site at present and no evidence to indicate interest from the other major house builders operating in South Wales.
There is also a limit to the number of sales outlets that any one site can provide as they inevitably will compete with each other. Evidence of historic completions on large sites in Newport indicates annual average completions of 95 per annum at Dyffryn / Celtic Horizon and 135 per annum at Afon Village Rogerstone. The LDP has therefore significantly over estimated the delivery rates from the EEA during the plan period.

There are also concerns about the delivery of the following sites many of which have been identified in previous plans and have not come forward for development over a considerable period. The LDP assumes that following 17 sites will provide 1221 dwellings in the plan period.

H1 (1) McCreadys, Ponthir Road (54 dwellings) – the site was first identified on the HLA schedule in 1999.

H1 (2) Hanbury (12 dwellings) – there is no planning approval for the scheme and should be discounted.

H1 (6) 254 Cromwell Road (15 dwellings) – planning permission has lapsed and should be discounted.

H1 (10) Pencoed Castle (12 dwellings) - first included on HLA schedule in 2008 and viability of site is questionable with works to castle required.

H1(15) Victoria Wharf, Old Town Dock (130 dwellings) – planning permission has now lapsed and should be discounted.

H1(16) Penmaen Wharf (160 dwellings) - first included on HLA schedule in 2008, classified as 3(i) in the JHLAS, no commitment to implementing current permission.

H1 (22) Albany Chambers (14 dwellings) - this site is not included within the five year supply and should be discounted.

H1 (23) Traston Lane (21 dwellings) – first included on HLA schedule in 1999 and should be discounted.

H1 (24) 30-33 High Street (24 dwellings) – planning permission has lapsed and should be discounted.

H1(27) 21 Kelvedon Street (25 dwellings) - resolution to grant in 2009 and Section 106 Agreement not signed. Site should be discounted.

H1(31) Roman Lodge (10 dwellings) -resolution to grant in 2010, section 106 not signed . Site should be discounted.

H1 (32) Former Sainsburys (140 dwellings) -resolution to grant in 2010, section 106 Agreement not signed. Site should be discounted.

H135 East Usk Yard (100 dwellings) - long narrow site adjacent to the main London to Cardiff Railway Line - noise and flood mitigation required and unlikely to be of any developer interest. Site should not be included as an

allocation as it prevents deliverable sites from being allocated. Nothing to prevent planning application from being submitted, if there is developer interest as it would be treated as a windfall.

H1(49) Mill Street (7 dwellings) – first included on the HLA in 1999 and should not be included as an allocation as it less than 10 dwellings.

H1(50) Herbert Road and Enterprise House (62 dwellings)- first included in the HLA in 2000. This site requires substantial flood mitigation measures to enable development and is not a viable site. Site should not be included as an allocation as it prevents deliverable sites from being allocated. Nothing to prevent a planning application from being submitted if there is developer interest as it would be treated as a windfall.

H1(51) Whitehead Works (400 dwellings) – first included in the HLA in 2003, allocated in the UDP and should not be included as an allocation which prevents deliverable sites from being allocated. If there were to be developer interest a planning application would be acceptable in principle and treated as a windfall.

H1(53) Bideford Road (35 dwellings) – first included n the HLA in 1999 and should not be included as an allocation . Nothing to prevent a planning application being submitted as it would be treated as a windfall site.

The combined shortfall from the EEA and the above sites is over 3000 dwellings which means that there is no flexibility in the land supply. Moreover there are no measures built into the plan to enable an appropriate response when the identified sites fail to deliver at the anticipated rate. Rather than dealing with this matter at a subsequent review consideration should be given to allocating a wider range and choice of sites now including sustainable greenfield extensions or at the very least identifying reserve greenfield sites which should come forward for development at the first trigger point (after 2011-2016) when it is demonstrated that the LDP is failing to deliver sufficient housing to meet the LDP requirement.

Table 1 - Extract from UDP Inspector's Report

Disputed Sites	Total units on site	Harmer	Boyer	NCC	Actual Completions at 1st April 2011	Actual Completions at 1st April 2013
Adj Macready's Warehouse, Ponthir Road	51	0	0	25	0	0
St Cadoc's Hospital	250	0	0	125	0	0
Bus Depot, Corporation Road (aka Penmaen Wharf)	160	0	0	160	0	0
Town Reach (adj depot & club)	190	190	0	190	0	86
Land between Spytty Pill and Corporation Road	120	120	0	120	125	125
Land fronting River North of Spytty Pill	231	125	0	231	282	307
Eastern Expansion Area	1100	300	150	1100	0	0
Former Llanwern Steelworks	600	150	0	600	0	45
Former Pirelli Works, Corporation Road	200	0	0	150	0	0
Herbert Road	50	0	0	50	0	0
Duffryn Remainder Part 2 (East of Lighthouse Road, Duffryn)	139	139	139	139	139	0
North of Crindau Pill	170	0	0	170	0	0
Crindau Deposit UPD site	250	0	0	170	0	0
South of Percoed Reen	480	0	0	350	0	0
Bideford Road - Phase 3, Maesglas	35	0	0	35	0	0
TOTAL	**3816**	**1024**	**289**	**3615**	**596**	**752**

Table 2 - Housing Trajectory

	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26
Completions	15	45	60												
Persimmon				60	60	60	7								
St Modwens app				10	38										
Llanwern						60	120	120	120	120	120	120	120	120	120
EEA & Woodland site, Ringland					30	60	60	60	60	60	60	60	60	60	60
Total	15	45	60	70	128	180	187	180	180	180	180	180	180	180	180
Cumulative Total	15	60	120	190	318	498	685	865	1045	1225	1405	1585	1765	1945	2125
Requirement	280	280	280	280	280	280	280	280	280	280	280	280	280	280	280
Shortfall	265	235	220	210	152	100	93	100	100	100	100	100	100	100	100
Cumulative Shortfall	265	500	720	930	1082	1182	1275	1375	1475	1575	1675	1775	1875	1975	2075