

**NEWPORT CITY COUNCIL
LOCAL DEVELOPMENT PLAN EXAMINATION**

HEARING SESSION 13: ALTERNATIVE HOUSING SITES:

CWRT CAMLAS, ROGERSTONE

Prepared by Boyer Planning on behalf of The John Family and Newbridge Estates Ltd (321)

Background to this Statement

1. This statement is prepared on behalf of our clients the John Family and Newbridge Estates Ltd who control approximately 3 ha of land at Cwrt Camlas, Rogerstone. The site (Appendix 1) is located immediately and forms an extension to the recently constructed Children's Centre and housing estate of Cwrt Camlas. It is capable of accommodating approximately 30 dwellings.

2. The site is immediately available for development and complies with the relevant technical objectives of PPW including para 4.4 in meeting the needs of residents and para 9.2.3 of PPW insofar as it is free from constraints and economically feasible for development. It would contribute towards the overarching strategy of the plan in providing housing to meet the needs of Newport and help align housing supply to job creation and growth.

3. In this regard, we would expect that subject to detailed planning permission it would contribute towards the housing land supply and be developed over a period of approximately 2 years (including time taken to prepare a detailed application and discharge conditions). All infrastructure is already in place following the recently completed adjoining development.

4. In response to the Deposit LDP, Boyer Planning submitted representations proposing the inclusion of land at Cwrt Camlas within the list of allocated housing sites (321.L2/H01) as well as the inclusion of the site within the Settlement Boundary (321.L3/SP05). This representation, concerning the alternative site, is to be read in conjunction with representations in relation to the Deposit LDP's housing provision strategy (321.L1/H01) and the Hearing Statements submitted to Examination Sessions 2 and 3 (ED004.8/ED005.7).

5. For the reasons set out herein, the subject site should be expressly identified for housing, additional information in this regard is provided in the following appendices which is to be read in conjunction with this Statement:

- Appendix 1: Site Location Plan
- Appendix 2: Development Framework Document
- Appendix 3: Illustrative land use masterplan
- Appendix 4: Visual Assessment
- Appendix 5: Ecological Assessment
- Appendix 6: Letter from Llanmoor Homes

Question 1: On what basis is the allocation contended to be needed in order to make the Plan sound?

6. Based on the evidence presented at Hearing Sessions 2 and 3, it is presently the case that the plan would fail a number of the relevant tests of soundness (including C2, CE1, CE2 and CE4). Following the initial hearing statements it is the case that:

i. The distribution of proposed housing allocations does not reflect a robust nor appropriate range and choice of housing for existing communities contrary to the requirements of PPW para 9.1.1;

ii. The LDP strategy and approach to housing supply is based on a continuation of the UDP approach and is fundamentally reliant upon sites that have largely remained unimplemented and that do not comply with the PPW para 9.2.3 requirement to be free, or readily freed, from planning, physical and ownership constraints, and economically feasible for development, so as to create and support sustainable communities where people want to live;

iii. The residual requirement of the LDP is already increasing and it is plainly the case that the reliance upon windfall sites (to make up for the shortfall in new allocations and lack of delivery of strategic sites) seems set to continue with the identified supply already reliant upon sites such as the the former Panasonic site which represents a significant element of double counting;

iv. If the annual housing target (which is now at least 734 dwellings) is to be met then it will require the supply to be comprised of a mixture of deliverable sites in a range of locations across the Local Authority area. Historically the Council confirmed that on when completions achieved around 700 per annum it has been based on deliverable sites in a wide range of sites (including Afon Village at Rogerstone, Celtic Horizon at West Newport, as well as sites within the urban area of Newport and at Langstone and Caerleon). Such a mix is required if the LDP requirement is to be achieved;

v. There is agreement that there is a shortfall in housing numbers identified within the supply to meet the requirement. Whilst the exact shortfall is to be determined when more accurate information is prepared by the Council, it is likely to be in excess of 1,000 dwellings due to:

- reliance upon s106 sites (250) that have remained unsigned for several years. These sites are windfall sites, that do not have planning permission and cannot be considered to be available in line with PPW. Accordingly such cannot be relied upon as part of the supply pool;
- sites remain that are still subject to constraints and unlikely to be available for development. There are numerous sites that have been within JHLAS schedules for over 15 years and absent any evidence of progress they will be removed from the 2014 JHLAS. In addition based on evidence submitted to the examination and proposed location of H16 (i and ii) allocations other sites will be moved into 3(i) of the JHLAS. Such sites could account for up to 700 dwellings;
- in addition we note the East Bank is a railway siding and is being used for storage by Network Rail and there are around 100 dwellings at City Vizion that have been double counted. These would account for a further 200 shortfall; and
- reliance upon windfall sites and double counting of windfalls. The UDP relied upon windfall sites being identified due to the failure of allocated sites to be brought forward for development and deliver at the rates required. The LDP relies upon precisely the same sites and due to the failure to date of large sites to be delivered is already reliant upon windfall sites (such as Panasonic).

vi. There are substantial concerns over the ability of the four sites that comprise the Eastern Expansion Area to deliver c.3600 dwellings during the plan period (300 per

annum between April 1st 2014 and March 31st 2026) based on historic lack of delivery, location of gypsy allocations, lack of present interest from volume housebuilders and historic completions rates on sites elsewhere in Newport (Afon Village at Rogerstone averaged 95 dwellings per annum). This could result in a significant material shortfall in dwellings over the plan period.

7. Accordingly further additional deliverable land is required to be identified in order to achieve the overall housing requirement, strategy of the plan and aims of the Welsh Government and Welsh Minister. Such further sites are required in order to satisfy the following tests of soundness:

- C2 to ensure that the Plan is sufficiently robust and flexible to ensure compliance with Planning Policy Wales and allocate sufficient and appropriate land for housing;
- CE1 to ensure that Policies flow logically from the strategy of the plan which seeks to identify suitable land for housing to match job growth with strategy and meet the needs of the community;
- CE2 to ensure that it is based on credible and reliable evidence; and
- CE4 to ensure appropriate flexibility to deal with the continued shortfall of housing land, the failure of existing sites to be developed and reliance upon unidentified supply.

Question 2: Is the site free from constraints and deliverable?

8. As part of the ongoing promotion through the LDP process detailed assessments relating to the site have been undertaken to demonstrate the deliverability of the site. The assessments informed the production of the Development Framework Documents, submitted as part of the of the Deposit LDP stage, which has been updated for submission as part of this Hearing Statement (as attached at Appendix 2). These confirm that the site is free from constraints and deliverable.

9. An illustrative masterplan (Appendix 3) has been prepared and submitted as part of the Development Framework Document to illustrate the way in which development could proceed. The masterplan demonstrates that the site can accommodate approximately 30 dwellings.

10. The layout has taken account of ecology and the nature of the site by retaining hedgerows and field boundaries where possible. There are minimal breaks in the hedgerow, only two access points to the south, and proposed new hedgerow planting along the northern and eastern boundaries will provide an enhancement whilst further limiting any visual impact. Given that the site is wholly contiguous with the settlement boundary at Rogerstone and is well contained in landscape terms, we consider that it provides a logical extension to the existing recently constructed housing estate (Cwrt Camlas).

11. Llanmoor Homes have considered the site and confirm that from their perspective it is deliverable and development could proceed as we have suggested.

12. As noted, we consider that there are no obstacles to the delivery of the site. On approval of a planning application it would be available to contribute towards the TAN 1 five year supply of genuinely available land for housing. We summarise the main technical considerations below:

Sustainability

13. The site is in close proximity to a number of Bus stops with shelters which are located on High Cross Road near to the junctions of Cwm Lane and High Cross Lane, circa 250 metres from

the site as confirmed by Stuart Michael Associates. These stops are serviced by regular bus services 1, R1, R2, 1, 1A and 1C linking with Newport Town Centre, approximately 2 miles away and various towns in the eastern valley as well as the national rail network at Newport.

14. Rogerstone has a good range of retail and community facilities that are all within reasonable walking and cycling distance, including post offices, a health centre, various convenience stores, public houses, take away food outlets, petrol filling stations, hair dressers, churches (various denominations) and a veterinary clinic. Rogerstone also has a number of sports grounds, including Newport Athletics club as well as playing fields.

15. High Cross and Rogerstone Primary School and Bassaleg Secondary School are conveniently located to the site. There are also local employment areas at the Wern and Tregwilym Road Industrial Estates as well as at Afon Village where there is a railway station linking Rogerstone to Cardiff and Ebbw Vale.

Landscape

16. A visual assessment of the site from a number of surrounding viewpoints has been undertaken by Robert Rodger Associates Ltd (Appendix 4). The assessment confirms that from distant views (1.2km) such as Ridgeway, the site and proposed residential development would be seen in the context of Rogerstone, Cwm Lane/Cwrt Camlas/Children's Centre and would have a minor visual impact. Accordingly it is concluded that there would be no adverse impact on landscape.

Transport

17. Stuart Michael Associates have confirmed that vehicular access to the site would be taken from an extension of the existing residential access roads served by Cwrt Camlas. Secondary access can be taken from Diwedd Camlas.

18. Newport City Highways recognise that the *"highways infrastructure to access the site has already been provided"*¹ and other than requiring a Transport Statement as part of a planning application do not provide further objection. The agreement that a *"suitable access could be provided to the site, that it was capable of being serviced and that it was in a sustainable location"* (para 3.55 refers) is also noted by the UDP Inspectors Report².

19. In this regard it is further noted that a ghost island priority junction with B4591 High Cross Road provides a good standard of access to the site. In addition the local highway network is considered capable of accommodating the potential level of traffic generation from the site.

Ecology

20. Ecology is not considered to be a constraint to the development of the site. This was confirmed by a Desk study and Extended Phase 1 Habitat survey which were undertaken on the site, by a qualified Ecologist (Soltys Brewster Ecology) (Appendix 5).

21. These ecological assessments confirm that the site is not covered by any form of nature conservation designation and no records of protected or notable flora and fauna were associated specifically with the site.

¹ SD31 – Alternative Sites Consultation Report (RAS(N)027)

² UDP Inspectors Report 2005

22. The Survey identified a limited range of habitats and confirmed that the site predominantly comprises of species-poor neutral grassland. The only local value ecological feature is the eastern boundary hedgerow which whilst having some potential to support nesting birds and provide flight corridors for foraging/commuting bats, however is not located within the site and is some distance from the eastern edge of the proposed development. Subject to the retention and protection of the hedgerow there are limited ecological constraints.

Flooding

23. TAN 15 Development Advice Maps indicates that the entire site is located within Zone A – Considered to be at little or no risk of fluvial or coastal flooding and would not constitute a constraint.

Drainage

24. Surface water run-off from the proposed housing development can be controlled and discharged at rates not exceeding the existing and currently undeveloped site, whilst foul water and sewage would be discharged to the local mains network.

25. Dwr Cymru Welsh Water has confirmed that there is adequate capacity in the local water network, local sewer network and waste water treatment to facilitate the development of the site³.

Heritage

26. It is noted that Fourteen Locks (Scheduled Monument) and the Monmouthshire and Brecon Canal are located to the north of the site. However, given the land and the mature vegetation separating the site from the canal it is considered that the visual impact is negligible. Due to the existing surrounding development it is not considered that the new residential development would impact on the setting of the Schedule Monument. Further consideration would be provided as part of a planning application.

Utilities

27. The required infrastructure (water, power, gas and telecommunications) is already installed and connection points ready from the existing recently completed estate to provide sufficient capacity to allow the development of the site.

28. This confirms that the site is an eminently suitable site for allocation and will contribute towards a genuinely available supply of land upon adoption of the Plan.

Conclusion

29. It is evident from the assessments undertaken as part of the Development Framework Document (as detailed above) and the separate submissions made to the Deposit LDP in regards to Policy SP5 – Countryside and H1 – Housing Site (Allocation) that there are no overriding constraints to the development of the site.

³ SD21 – Alternative Sites Consultation Report (AS(N)005)

Question 3: Would allocation of the site fit with the plan strategy? What principal factors lead to this view.

30. As has been demonstrated, the dLDP presently fails to address the need for sufficient housing land to be identified in line with PPW and the strategy of the Plan itself. In allocating a site that is genuinely available for development there will be certainly that needs can be met rather than relying upon sites that are unidentified and have previously remained unimplemented.

31. The allocation of the site is therefore required in order to address the following objectives of the plan:

- *Objective 1 – Sustainable use of land:* the site is located in a sustainable location in terms of existing facilities and will positively contribute towards the community;
- *Objective 2 – Climate change:* the site will contribute positively in terms of mitigating against the impacts of climate change by providing for the needs of its population, mitigating against out commuting and longer distance commuting across the city and incorporating design measures as appropriate at the detailed design stage;
- *Objective 3 – Economic Growth:* the site will complement the existing land supply and help match the level of future job growth with land for housing. It will help mitigate against the problems of a constrained housing land supply and:
 - I. Contribute towards the level of growth envisaged for Newport County;
 - II. Provide adequate housing for the workforce to grow appropriately;
 - III. Provide housing to help attract and retain a working age population and ensure no adverse impact on labour supply;
 - IV. Facilitate the formation of new households by matching supply to demand;
 - V. Help provide affordable housing across all parts of the city not just on the east;
 - VI. Help reduce reliance upon commuting out of the county
- *Objective 4 - Housing provision:* the site will ensure that there is an adequate supply of land in a sustainable location and ensure that the quantity, quality and variety of housing meets the needs of the population. It will ensure a PPW compliant supply of land for housing;
- *Objective 5 – Conservation of the built environment:* insofar as there will be no adverse impacts upon the quality of the historic or built environment;
- *Objective 6 – Conservation of the Natural environment:* as demonstrated by technical evidence submitted there will be no adverse impacts on landscape or biodiversity;
- *Objective 7 – Community Facilities:* as there will be an opportunity to provide community benefits to the local area;
- *Objective 8 - Culture and Accessibility:* the site will ensure access for all is achieved;
- *Objective 9 - Health and Well Being:* it will provide an environment that is safe and by encouraging walking will help promote suitable lifestyle choices;
- *Objective 10 – Waste:* it will incorporate measures to minimise the impact of waste.

32. Given the above, we consider that the site will contribute positively towards the existing strategy of the Plan and achieving the vision for Newport. It will complement the existing approach being taken by ensuring an additional source of deliverable and sustainable land for housing. In this regard it will plainly ensure that the supply of housing is robust and sound in order to match the economic growth strategy being taken.

33. The changes to the Plan sought in relation to land at Cwrt Camlas, Rogerstone are a direct response to the inherent problems with the present land supply identified and will contribute towards the tests of soundness as set out in of this statement.

Required Changes

34. The allocation of the land at Cwrt Camlas, Rogerstone in Policy H1 for 30 dwellings.

35. The alteration to the settlement boundary is a consequential change to the plan that would logically follow its allocation for development.

Boyer Planning
April 2014