NEWPORT CITY COUNCIL
LOCAL DEVELOPMENT PLAN EXAMINATION

HEARING SESSION 13: ALTERNATIVE HOUSING SITES

GLOCH WEN, RHIWDERIN

Prepared by Boyer Planning on behalf of Newbridge Estates Ltd (2072)

Background to this Statement

1. This statement is prepared on behalf of our clients Newbridge Estates Ltd who control approximately 9 ha of land at Gloch Wen, Rhiwderin. The site (Appendix 1) is located immediately adjoining the built up edge of Rhiwderin and is capable of accommodating approximately 140 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 the next 2 to 5 years.

4. In response to the Deposit LDP, representations were submitted proposing the inclusion of land at Gloch Wen, Rhiwderin within the list of allocated housing sites (2072.L4/H01) as well as the inclusion of the site within the Settlement Boundary (2072.L2/SP05) and removal from the Special Landscape Area (2072.L3/SP08). This Statement, is to be read in conjunction with representations in relation to the Deposit LDP’s housing provision strategy (2072.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: Access Drawings
   Appendix 5: Ecological Assessments
   Appendix 6: Landscape and Visual Extracts
   Appendix 7: 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 a number of detailed assessments relating to the site have been undertaken. The assessments informed the production of the Development Framework Document, 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.

10. The masterplan provides 4.6 ha of developable land for residential use which is capable of providing approximately 140 homes at a density of 30dph. The layout includes residential development within existing field parcels, proposed access arrangements, retention of the majority of surrounding and internal hedgerow network, a buffer for SAM to the north and the retention of local woodlands.

11. Given the fact that the site is wholly contiguous with the settlement boundary, well contained and relates physically to Rhiwderin we consider that it provides a logical extension to the existing 1980’s housing estate.

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

13. In this regard, it is plainly the case 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

14. The site occupies a very sustainable location. Rhiwderin has a wide range of facilities within easy distance of the site. Indeed, there is a community centre, a newsagent, post office, place of worship and a public house all within 500m of the site. In addition, site is within a reasonable walking and cycling distance to Pentrepoeth Primary School and Bassaleg Secondary School.

15. In addition there are regular bus services close to the site providing links to Newport City Centre as well as other inter urban bus services to surrounding towns including Caerphilly, Ystrad Mynach, Bargoed and Cardiff.

Vehicular Access

16. There are no highways constraints to development.

17. The accompanying Drawings No. 4836.001 and 4836.002 attached at Appendix 4 demonstrate how access will be achieved. They illustrate that following a detailed analysis of the site and surrounding environs the proposed primary vehicular access to the site would be formed directly from an extension of Chapel Terrace. It is also confirmed that there is scope for a secondary (or emergency) access to be formed onto Harlech Drive. There would be an internal link road.

18. Harlech Drive connects with the strategic highway network (A468 Caerphilly Road) via Tredegar Street. Access to the wider highway network from Rhiwderin is via the A468 Caerphilly Road. The junction of Pentre-Tai Road with the A468 is the main access point into the village. Pentre-Tai Road is traversed, at grade, by the existing Bassaleg to Machen freight only railway line near to the junction with the A468.

19. The assessments of the site by Newport City Council (Highways) do not provide any in principal objection; rather a full transport assessment would be required. This would be a detailed matter for consideration through a Planning Application.

20. It was common ground between the promoter and the Council at the UDP Examination that the site is capable of being serviced and that safe vehicular access could be provided on land within the public highway or in the ownership of the promoter. The evidence indicated that the development of this particular site for housing would not have an unacceptable effect on the local road network. (Para 3.72 of the UDP Inspectors report refers). The current approach the access to the site is detailed above, and again it is highlighted that there is no in principal objection to the access of the site.

21. With regard to the single track Machen-Bassaleg Freight Railway, recent surveys have shown that train movements are minimal. It is understood that there are currently approximately three trains a week. Consultations with Network Rail have indicated that the existing form of level crossing is capable of accommodating the additional traffic associated with the site.

22. Indeed the Appeal Inspector for the adjoining residential development at the Former Allotments (appeal ref APP/G6935/A/09/2118975) noted that the issue of the railway crossing was not a significant point as the few trains each day which use this line travel only slowly but even so take less than 1.5 minutes to pass the level crossing. The Inspector noted “Whilst it is possible therefore that during such times some vehicles need to wait on the busy A468, nevertheless I do not consider that this is a weighty objection to the proposals” (para 36 Ref).
Ecology

23. Ecology is not considered to be a constraint to the development of the site. This was confirmed by an Extended Phase 1 Habitat survey and updated walkover survey (Appendix 5) which were undertaken by Soltys Brewster Ecology.

24. These ecological assessments confirm that the site consists of improved grassland enclosed by a network of well-established native hedgerows. In terms of the site's development potential, the large areas of improved grassland are of little or no ecological interest and represent the most suitable areas to support development.

25. In terms of the hedgerows and woodland there is potential for nesting birds and foraging bats and therefore the areas would largely be retained and used to frame the development footprint and contribute to a green infrastructure network. This would be a detailed matter for consideration through a Planning Application.

26. Regard is also had to the adjoining Afon Ebbw River, which is identified as a SINC (RO1). It is not intended that any development would be located within the SINC and it is proposed to include an appropriate buffer in this regard such that there would be no adverse impact upon the local designation.

Flooding

27. TAN 15 Development Advice Maps indicate that all proposed development will be located within Zone A – Considered to be at little or no risk of fluvial or coastal flooding.

28. There is a small section of the site to the southeast corner, where a brook connects to the River Ebbw, to be located within Zone B – Areas to have known to flood in the past. This area is mainly existing woodland which is to be retained as part of the landscape structure.

Drainage

29. It is proposed that surface water run-off from the housing development can be controlled and discharged at rates not exceeding the existing and currently undeveloped site. DCWW have confirmed that foul flow from this development site will drain to the Cardiff Bay Wastewater Treatment Works which can accommodate the foul flows.

Landscape

30. We do not consider that there would be any adverse landscape impacts that would arise due to the development of the site. Indeed, it is very well contained by existing topography and trees by virtue of its location on the lower slope of the valley side, it is adjoined by built development and there are limited views into or out of the site from the countryside.

31. We note that the site is identified as forming part of the West of Rhiwderin Special Landscape Area. A landscape assessment of the wider surrounding area was undertaken in relation to the application and appeal at Gloch Wen (ref APP/G6935/A/09/2118975) by Soltys Brewster Landscape. This identified five general landscape character areas contained within and surrounding the site (Appendix 6). Of the five character areas identified it was concluded that the proposed allocation falls mainly within the Valley Sides which is characterised by and comprises of both urban and rural landscapes and contains the transitional urban rural fringe zones.

32. It is clear that the site and surrounding area within the Valley Side classification are subject to significant urban human influences, the network of hedgerows, trees and woodland
copses would be retained where practical to provide a green infrastructure network and the site is set down in the wider landscape.

33. This view was confirmed by the UDP Inspector, who noted that there were limited views into or out of the open countryside and that as it is enclosed on the lower slope of a valley side the visual impact of any housing on the proposed development site would be limited and that it would not affect the setting of the nearby scheduled monument.

34. Given the urban influences, topography and green network it is considered that the site would be set within the wider landscape, the landscape of the site is not considered to be a constraint, and the development of the site would not have any adverse impact upon the SLA.

Archaeology

35. With regard to any impact on archaeology the previous assessment undertaken as part of Former allotments redevelopment (ref APP/G6935/A/09/2118975) recommends that any new housing should lie at a minimum of 200 metres from the edge of the designated Scheduled Monument. This approach was accepted as part of that development, and does not constrain the site. Furthermore in the Candidate Assessments no reference by Newport Conservation Officer is made on this matter.

36. Rather reference is made to the Grade II Listed Gloch Wen Farmhouse (listed in relation to its interior). It is not considered that the development of the site would have a demonstrable impact on the setting of the Farmhouse, and that detailed consideration will be given at the planning application stage.

Conclusion

37. 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, H1 – Housing Site (Allocation) and SP8 – Special Landscape Areas, that there are no overriding constraints to the development of the site.

38. The acceptability of the site in terms of lack of constraints was previously confirmed as part of the Unitary Development Plan Examination. However, at the time of the UDP the Inspector considered that the need for additional greenfield housing allocations did not outweigh the loss of countryside, it is clearly not the case in this instance and the site should be brought forward for allocation.

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

39. 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.

40. 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.

41. 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.

42. The changes to the Plan sought in relation to land at Gloch Wen, Rhiwderin are a direct response to the inherent problems with the present land supply identified and will contribute towards meeting the tests of soundness as set out in Para 7 of this statement.

**Required Changes**

43. The allocation of the land at the Gloch Wen, Rhiwderin in Policy H1 for 140 dwellings.

44. The alteration to the settlement boundary and removal from the SLA are consequential changes to the plan that would logically follow its allocation for development.