NEWPORT CITY COUNCIL
LOCAL DEVELOPMENT PLAN (2011 – 2026) EXAMINATION
HEARING SESSION 13: ALTERNATIVE HOUSING SITES (Written Submission)

Submission prepared by R E Phillips & Partners, Chartered Surveyors on behalf of Pontymister Developments Limited (1418).

We are a firm of Chartered Surveyors established in Newport in 1960 that operates mainly in the Newport and South East Wales area, managing Clients' landholdings and promoting sites for development, contributing over 2500 residential units during that period from single plots to sites of over 150 units. We specialise in assembling land, securing planning permission for various uses and bringing sites forward that are immediately available, often with access and services constructed in advance so that development can proceed without delay.

This written submission supports previous representations made throughout the Plan process on behalf of Pontymister Developments Limited in relation to Risca Road, Rogerstone (Site Location at Appendix 1) which this statement is to be read in conjunction with.

These previous representations to the Deposit Plan and Examination comprise of:

- 1418.L1/H01 – Housing Allocation;
- 1418.L2/SP07 – Green Wedge;
- 1418.L3/SP05 – Countryside;
- 1418.L4/H01 – Housing Supply;
- ED004.9 – Hearing Session 2 Written Statement; and
- ED005.8 – Hearing Session 3 Written Statement.

Furthermore, as part of the ongoing promotion through the LDP process, a number of detailed technical assessments have been undertaken for the site to demonstrate its deliverability. 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).

Newport Council Property Services has supported the proposed alternative use of the site for residential development as it facilitates the release of a small parcel of Council owned land to the east. We consider that there would be an opportunity to provide a comprehensive approach with the Council in this regard.

We wish to make further representations in relation to the proposed site at Risca Road, Rogerstone and enclose a copy letter from Llanmoor Homes Limited, confirming their Company's support for the promotion (as attached at Appendix 3).

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

In previous representations to the Deposit LDP (1418.L4/H01 – Housing Supply / 1418.L1/H01 – Housing Allocation) and Hearing Session Written Statements 2 and 3 (ED004.9/ED005.8) it was contended that the proposed housing land supply would be inadequate to meet the identified 10,350 dwellings.
We note:

- The sites identified as being available during the plan period will not deliver the necessary completions. Many have been around for some considerable time and are subject to constraints that there is no indication can be overcome;

- The estimation of delivery at Llanwern is significantly overstated when based on historic delays, constraints and progress to date;

- Traditionally when Newport has achieved high levels of housing completions it has been on a range of sites of varying sizes and types across the city. We do not consider that this range exists within the LDP, rather it is concentrated to the east and City centre and on larger sites;

- There is a shortage of land available to suit all communities. There are settlements and communities outside of the main urban area that require additional housing to accommodate their natural growth;

- There is a shortage of genuine new build executive housing in Newport that is required to attract employers and managers needed to boost employment levels;

- An element of supply is subject to s106 agreements being signed. Given the already significant delays such sites cannot be robustly considered to be deliverable; and

- There is no flexibility allowance for non-implementation which is likely to be a significant problem.

Furthermore, we are aware that concerns were discussed at length at Hearing Sessions 2 and 3 which raised numerous problems in relation to the land supply.

Given these concerns and for the reasons set out in our previous representations, we consider that the allocation of the site would assist in addressing the problems with the identified housing strategy which results in a lack of soundness having regard to tests C2, CE1, CE2 and CE4.

Indeed, it is considered that the LDP remains reliant upon dwellings being provided at brownfield sites that are subject to a range of constraints and have historically failed to deliver. Planning Policy Wales (9.2.3) is clear that “sites must 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. There must be sufficient sites suitable for the full range of housing types”.

In this regard it considered that the land at Risca Road, Rogerstone is an eminently suitable site for residential development as discussed below.

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

A master plan has been prepared demonstrating that the site can provide 35 dwellings in the short term with the potential for further expansion in the longer term. There are no constraints and we consider that the site is deliverable based on the following considerations:
**Sustainability**

With regards to public transport regular bus services run along Risca Road providing both links between Newport and Risca / Pontymister Tesco as well as between Newport and Blackwood. Rogerstone railway station is within 800m of the site and forms part of the Ebbw Valley line providing an hourly service Monday to Saturday between Cardiff Central and Ebbw Vale Parkway.

Moreover, the site is convenient to a good range of facilities including a post office, shops, restaurants, places of worship and employment areas that are all within reasonable walking and cycling distance. Rogerstone Primary School (1.2km) and Bassaleg Secondary School (2.8km) are conveniently located to the site.

Also, as part of the Newport UDP Inquiry it was confirmed that the site is considered as a sustainable location and this was common ground with the Authority (para 3.63 of the UDP Inspectors Report 2005 refers). In the case of this promotion it is considered that the site is still a highly sustainable location.

**Flooding**

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**

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.

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 site\(^1\).

**Ecology**

With regard to ecology it is not considered to be a constraint to the development of the site. This was confirmed by an assessment undertaken on the site, by a qualified Ecologist (Soltys Brewster Ecology).

The site survey concluded that the majority of the site is of limited ecological value and that the grassland is being encroached by areas of Bramble and Himalayan Balsam which continue to detract any ecological value.

Soltys Brewster have considered the suggested designation as a SINC - Oaktree Cottage Fields, (RO5)\(^2\). It is noted that a previous assessment, undertaken in 2005 with regard to the objection to the candidate site SINC within the UDP, outlined that that the site was degrading in its quality at that

\(^{1}\) SD21 – Alternative Sites Consultation Report (AS(N)053)

\(^{2}\) SD78 – Sites of Importance for Nature Conservation Background Paper (June 2013)
time. It is evident from the Soltys Brewster assessment that the continued encroaching vegetation would limit the quality of any SINC.

Furthermore, it recognised that the Authority’s SINC Background Paper (SD78) that a SINC designation is not an unduly restrictive designation but developments should minimise their impact through mitigation measures and offset by the use of compensation measures to ensure that there is no overall loss to nature conservation as required by national planning policy.

**Vehicular Access**
Stuart Michael Associates have confirmed that the principal vehicular access to the site can be formed directly from the B4591 Risca Road via property No. 102 (in the clients control). The right turn lane facilities on Risca Road would be extended and the existing bus stop and shelter would be relocated.

The accompanying Transport Drawing No. 4836.005 – Proposed Access Arrangement, attached at Appendix 4, illustrates the proposed access.

A Secondary access could be formed between No. 74 and No. 78 Risca Road with a third access/emergency access to the east of the site onto Pontymason Lane (below the canal bridge) both through land under the same control.

The proposed internal site layout will be designed in accordance with the guidance given in “Manual for Streets” and the advice contained in TAN12 Design.

B4591 Risca Road provides a high standard highway corridor and connection to the strategic highway network (A467 and M4).

As a matter of record the previous Inspector’s report on the objections to the UDP (paragraph 3.63) recorded the common agreement that the site is in a sustainable location and can be safely accessed.

Taking the above into consideration, and given the modest scale of development, it is concluded that the local highway network and a new access are capable of accommodating the potential level of traffic generation from the site.

**Green Wedge**
As detailed in previous representations to the LDP it is considered that development of the site would not harm the function of the green wedge in separating the settlements of Rogerstone and Risca, but would effectively manage growth in a way which responds positively to development pressures whilst maintaining separation between the settlements.

Para. 4.8.10 PPW indicates that the justification for including land in a Green Wedge will be assessed against the same purposes as including land in the Green Belt. (4.8.3) and the extent to which any of these is prejudiced by a proposal for development is clearly relevant to the assessment of harm. They are to:

- *prevent the coalescence of large towns and cities with other settlements*;
• manage urban form through controlled expansion of urban areas;
• assist in safeguarding the countryside from encroachment;
• protect the setting of an urban area;
• assist in urban regeneration by encouraging the recycling of derelict and other urban land.

We consider the relevance of these as follows:

1. Prevent Settlement Coalescence:
The development of the site for residential use would not add to the physical coalescence between Rogerstone and Risca. The plan at Appendix 5 shows the existing gap between the settlements is c. 480 m. However, the edge of the proposed development lies c. 240m back from the existing edge of Rogerstone as defined by Woodland Drive and would therefore be c. 750m from Risca.

Plainly therefore the proposal will not contribute towards coalescence in any way. Rather it will be set well within the existing limit of development and not impact upon the gap in any way.

2. Manage Urban Form (through controlled expansion of Urban Areas)/ safeguarding the countryside

PPW requires LPA's to manage urban form and boundaries in relation to development needs. There is plainly a requirement to increase the supply of housing and we consider that this site presents a suitable option for managed expansion without leading to coalescence of settlements.

Indeed, the site is very well connected to the urban area, it is bounded on two sides by existing development and would sit within the existing landscape and topography. It plainly relates well to the built context and would not be a protrusion into the countryside. In this regard, and given the fact that the site is set back from the existing urban edge, we consider it to be an illogical inclusion within the green wedge.

3. Protect Setting of Urban Area

There is no evidence that the site is required to protect the setting of the urban area. As the site adjoins the settlement boundary any new housing would be nestled into the lower lying visually well enclosed land immediately behind the existing residential dwellings. It would be viewed in the context of the urban area.

Furthermore in considering the adjoining Monmouthshire and Brecon Canal it is evident that the site is positioned at a much lower level, and the principle of residential development adjoining the canal has been established by the recent residential development at Pontymason Rise and Great Oaks Park on the eastern side of Pontymason Lane.

Consequently the site allows a controlled expansion of the urban area, providing a logical rounding off of the settlement which can be achieved by adopting a sensitive design for the site. In this regard, design measures can be incorporated to enhance the existing urban area and the Canal.

4. Assist in safeguarding the countryside from encroachment
We consider that the controlled expansion of the settlement provides an opportunity, through master planning and landscape design to form a more appropriate urban / rural edge to the existing settlement.

5. Assist in urban regeneration by encouraging the recycling of derelict and other urban land. Whilst the site is not specifically brownfield land it is clear that new housing is required in a range of locations to attract workers and in turn investment. The development of the site would help increase the supply of housing to match with forecast job growth. Therefore there is plainly an opportunity to increase private regeneration initiatives and opportunities indirectly.

Taking the above in to account it is considered that the development of the site would represent a modest and logical extension of the settlement boundary so that no adverse impact upon the role of the Green wedge would arise.

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

As noted in our response to Question 1 there is insufficient housing land available and there are a lack of allocations which provide a good range and choice of locations – this is contrary to the requirements of PPW and of the Plan itself.

In this regard it is proposed that the allocation of the site at Risca Road, Rogerstone would contribute towards addressing the deficit and meeting the needs of the population. The site is capable of coming forward early in the plan and it would contribute to key objectives of the plan that seek to 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. In addition it will contribute towards ensuring housing supply is matched to job growth and economic forecasts.

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.

**Required Changes**

The allocation of the land at Risca Road, Rogerstone in Policy H1 for 35 dwellings along with the consequential alteration to the settlement boundary and removal from the green wedge.