RE Phillips & Partners,
23a Gold Tops,
Newport,
NP20 4UL

23rd April 2014

Dear Sirs,

Newport Local Development Plan.

Llanmoor Homes was established in 1966 and is now one of the only remaining privately-owned housebuilders in Wales. We are very proud of our roots and our reputation in South Wales, and have built nearly 3500 new homes across the region in the past 48 years. We focus on building quality family homes, in attractive locations, and our sites aim to create friendly communities.

Having concentrated our efforts mainly in the Bridgend, Caerphilly and Rhondda Cynon Taff Local Authority areas we have been looking to expand further to the east, and last year acquired two new sites in Newport at Bethesda Fields Rogerstone (22 units) and Monbank Sidings (85units). A site start has been made at Bethesda Fields and it is anticipated the Monbank site will also commence shortly. These acquisitions were the culmination of an extended search process which proved informative as well as frustrating and our site acquisition strategy is now focussed on looking towards further acquisitions in Newport and the surrounding areas.

Through the search and acquisition process, it has come to our notice that the range and choice of sites is restricted by the limited number of larger allocations concentrated in the city centre and east Newport. We have identified that there is considerable demand and interest in a range of locations within the main urban area and the outlying settlements but the plan does not appear to recognise this in its choice of allocations, rather relying on existing supply. There is a particular skew to the east of the city with a very heavy reliance on one major brownfield site which will almost inevitably impede delivery and restrict range and choice in the market. There must be a genuine concern that this will drive purchasers beyond the Newport boundary to less urbanised sites in the adjoining settlements of Monmouthshire, Caerphilly and the east Cardiff communities.

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There are a number of settlements and communities outside the main urban area of Newport that could provide that range and choice, also allowing these communities to continue to grow and remain vibrant. The LDP has not recognised this; there has been no proactive approach towards spatial distribution of housing. Rather the plan simply relies on land carried forward from previous plans and unimplemented windfall sites from the past 15 years.

LDP's are required to provide for the full range of housing types in places where people want to live (PPW, 9.2.3). The present strategy places a huge reliance upon large brownfield sites in the city centre and to the east of the city at Llanwern. This fails to consider the smaller scale needs of existing communities that lie outside of the main urban area and the desire of local people to continue to live within existing communities rather than as part of larger brownfield regeneration schemes elsewhere.

Llanmoor Homes recently purchased their Bethesda Fields site through RE Phillips and Partners and are familiar with a number of the additional sites being promoted through the plan. We believe that the inclusion of these sites within the LDP would help deliver the number and mix housing within the plan period on a range of attractive deliverable and diverse sites.

These sites include:

- Land at Gloch Wen, Rhiwderin c. 140 dwellings;
- Cwrt Camlas, Rogerstone c. 30 dwellings;
- Land at Risca Road, Rogerstone c. 35dwellings;
- Land at Llwynhaid, Bettws c. 200 dwellings;
- Land at the Griffin, Basseleg c. 80 dwellings.

Having reviewed the information submitted in relation to the above sites we can confirm that we believe these sites are free from constraints, will be immediately available and will help ensure an appropriate balance of housing sites in a good range of locations.

Yours faithfully,
Llanmoor Development Co. Ltd.

S. GREY
Director