On behalf of Oak Court Estates (Langstone Mon.) Ltd.
Response to Main Discussion Matters - Newport Local Development Plan (LDP) Hearing Session No. 15: Alternative Sites 3 (Langstone)
9th May 2014

- On what basis is the allocation contended to be needed in order to make the Plan sound? What evidence supports this argument?

The Plan identifies a housing requirement of some 10,350 new homes over the plan period and proposes that the majority of these will be built on brownfield sites within the urban boundary. The Plan therefore seeks to allocate 82% of new housing units on brownfield sites, with the remaining 18% of units on greenfield sites.

As set out in our written representations to the Revised Deposit LDP in July 2013, we do not consider that the supply of housing land identified can achieve the level of growth set by the Plan. This is due to a fundamental issue in terms of deliverability as the Plan is too reliant on brownfield sites. Such sites are likely to have greater constraints and often have higher development costs and take, on average, a longer time period to develop, as evidenced by the historic failure of larger strategic brownfield sites in Newport to deliver the required levels of new housing over previous years (for example, at Llanwern).

It is a concern that the Plan simply carries forward many historical allocations from the UDP, which failed to deliver, and is too heavily reliant on a small number of large brownfield sites to deliver a significant number of new homes which are required over the plan period. The Plan over-estimates the rates at which development can be brought forward on such sites and it would only take a few sites to stall to severely impact on supply. This is likely to result in the LPA experiencing difficulties in maintaining the required 5-year supply of housing, as is currently the case in the neighbouring authorities of Caerphilly and RCT. Both authorities’ adopted LDPs are based on an over-reliance on a small number of large brownfield sites which have not, for various reasons, come forward at the rates initially anticipated, leading to major issues with undersupply.

A strategy which is too heavily focused on large brownfield sites is therefore considered to be fundamentally flawed and will result in the Plan not being able to meet its housing requirement and achieve its ambitious levels of growth.

Furthermore, the identified supply is not considered to be truly representative of the needs of all the communities across Newport as there is evidently an over-concentration of sites in a small geographical area, providing insufficient range and choice of sites elsewhere. PPW requires LDPs to provide for the full range of housing types in places where people want to live. The present LDP strategy is too focused on brownfield sites, mainly in Newport’s eastern urban area, which ignores the needs of existing communities outside the main urban area. Local people who wish to stay within their existing communities have very little choice in terms of new housing development which is focused on large brownfield regeneration sites in other, unfamiliar parts of the city. The soundness of the LDP strategy is therefore questionable.
The Plan could continue to follow a brownfield-first strategy but the emphasis on a high percentage of large brownfield sites to deliver vast numbers of units should be reduced. In the present economic climate, there is a need for readily developable and economically viable sites to be identified in the LDP to ensure the required housing numbers can be delivered. An appropriate number of suitable and deliverable greenfield sites should therefore be allocated, ideally in the form of sustainable extensions to existing settlements, to serve existing communities and to add to the range and choice of sites as required by PPW. This would enable the Plan to be robust and would provide different housing options in a variety of locations and settings (not just at Llanwern). This would also reduce the over-reliance on windfall sites (which PPW advises against).

It is considered that the subject site at Langstone provides a suitable option for a potential additional site allocation and it can be promptly developed to contribute to an adequate housing land supply for Newport.

• **Is the site free from constraints and deliverable?**

The site is free from constraints and is deliverable in the short term. As outlined in pre-application discussions with the LPA, the entire site falls within the single ownership of the client company. This allows the site to be brought forward immediately, without any land assembly constraints.

The site lies outside the floodplain and its development would not cause substantial harm in terms of its ecological, conservation or landscape effects.

Whilst part of the site is classed as Grade 3a agricultural land, it is not considered that this is an over-riding factor which warrants preserving the site from development, particularly when it is considered that there is a need for the proposed development and the agricultural land classification is likely to be out-of-date.

The key infrastructure obstacles concerning the development of the site relate to highways and drainage. In terms of highways, initial work has been undertaken by Traffic & Transport Planning confirming there to be a viable solution. The proposed development can be accommodated within the local highway network without issue and could also provide for much-needed access improvements to the nearby Langstone Primary School.

With regard to drainage, our client’s drainage consultant, Arup, has identified that there is capacity at the Magor Pumping Station to serve both the development itself and to assist in alleviating the existing difficulties arising in Langstone at present. The attached latter from Arup confirms that subject to detailed technical assessment, a solution is available in principle.

The client has undertaken an initial financial viability appraisal and is confident that while the infrastructure costs are fairly significant, the value which would be generated by the residential element of the site generates a scheme that overall delivers a developer profit within normally accepted levels.

The site has the potential, therefore, to make a valuable contribution to the LDP’s Growth Strategy both in terms of meeting the 5-year land requirement and meeting the short-term shortfall in available sites that has arisen as a consequence of the delay in the delivery of larger sites at Llanwern and the EEA.

• **Would allocation of the site fit with the plan strategy? What principal factors lead to this view?**

The plan strategy is one of ambitious economic growth. Sufficient land therefore needs to be allocated and delivered for housing as without a sufficient and adequate supply of housing in a range and choice of locations, Newport may not be able to attract and retain a working-age population and this would have an adverse impact on the supply of labour.
The subject site is well-located at the edge of an existing and popular settlement and occupies an attractive setting, close to existing transport links and services. It could accommodate approximately 250 new dwellings of varying size and tenure (including affordable housing). Community consultation has highlighted a pressing local need for new housing, housing for the elderly and affordable housing in Langstone. The proposed development could accommodate all three types of housing and would make a valuable contribution to the Plan’s stated housing requirement.

Furthermore, Langstone is notably deficient in facilities when compared to other villages within Newport. An extensive Council-led consultation with members of the local community to inform the LDP revealed their concerns over the lack of facilities for the village of Langstone and the need for new and improved community facilities for Langstone was also highlighted through recent and extensive consultations with the Community Council, undertaken by agents acting on behalf of the landowner.

The development plan should identify the growing needs of the local community and provide for them accordingly. Indeed, that is the very reason for having the development plan. Failure to give due consideration to these needs will lead either to the facilities being provided on an ‘ad hoc’ basis, without regard to wider strategic and sustainability requirements, or not at all. A key challenge, as stated in the Plan, is to ensure that all parts of the community, including rural areas, have effective access to services and community facilities yet no sites have been designated for such purpose in Langstone.

The subject site therefore presents a unique opportunity to plan comprehensively for the current and future development needs of the local community and to provide Langstone with the community/recreational facilities it requires as part of a comprehensive mixed-use development.

Against this background and the local need for new and affordable housing, the proposed development of part of the subject site would fit with the plan strategy and should be welcomed and the site allocated accordingly.

In summary, the site presents a significant opportunity to:

- Assist in meeting the overall housing requirement for Newport;
- Meet the pressing open market and affordable housing needs of Langstone, which could not be met by the allocation of major sites to the south of the M4 within the Newport conurbation;
- Ensure that Langstone fulfills its proper function as a village, through the provision of those facilities that its status in the settlement hierarchy demands, creating a more sustainable and self-contained community, reducing the need to travel to locations further afield to access alternative facilities; and
- Create local employment, through both the construction phase of the development and also in the longer term.