

NEWPORT LOCAL DEVELOPMENT PLAN EXAMINATION

**RESPONSE TO MAIN DISCUSSION MATTERS FOR HEARING SESSION 14:
ALTERNATIVE HOUSING SITES 2 - BETTWS, MALPAS, CAERLEON,
CHRISTCHURCH**

**SUBMISSION BY GERAINT JOHN PLANNING LTD
ON BEHALF OF REDROW HOMES LTD (3985)**

APRIL 2014



Geraint John Planning

1.0 INTRODUCTION

- 1.1 This note is provided as supplementary evidence to the previous submissions made on behalf of Redrow Homes Ltd in relation to the Local Development Plan (LDP).
- 1.2 The focus of our comments relates to questions and issues raised by, and set out in, the Inspector's Main Discussion Matters - as documented in the agenda to Hearing Session 14: Alternative Housing Sites 2 - Bettws, Malpas, Caerleon, Christchurch.
- 1.3 It should be noted that these representations do not respond to every question raised within the Inspector's Agenda, as all of these questions do not necessarily have a bearing on our clients' position and / or earlier submissions made on behalf of Redrow Homes Ltd are considered sufficient to address the matters raised. Accordingly, these representations only provide responses to questions where it is considered necessary and relevant to do so.

6. REP 3985 (II): LAND AT CHRISTCHURCH, NEWPORT (APPROX 2.6HA/25 UNITS)

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

The proposed site allocation at Christchurch, Newport is required to make the Plan sound in order to ensure that there are sufficient sites allocated to provide for a variety of housing needs.

It is considered that there is a fundamental issue in terms of the deliverability of the LDP's housing strategy as a result of the focus on brownfield sites. Brownfield sites, as previously developed sites, are likely to have greater site constraints with the potential need for site remediation works etc. Accordingly, brownfield sites can often have higher development costs and take longer to develop. Given the present economic climate there is a need for readily developable and economically viable sites to be identified – the proposed site at Christchurch, would be able to respond to such needs.

The Plan is considered to overestimate the speed in which development can be brought forward on a number of brownfield sites, and does not allow for a range and choice of sites to come forward as and when they are required. Accordingly, it is our view that the proposed primarily brownfield strategy concentrating on large sites should be amended to include a number of appropriate greenfield sites that are able to come forward in a timely manner in response to market demands.

This will ensure that a range and choice of housing site and opportunities across the Council's area are provided (in accord with PPW) – in order to ensure that the Plan is able to provide for the level of housing need identified, and also provide for different housing choices in a range of settings and locations – which is needed if the housing market is to function effectively.

In addition, the bulk of housing land allocations are proposed on the eastern side of Newport. Concern is therefore raised in regards to the spatial distribution of housing – with areas to the west of the city being underprovided for. Likewise, the concentration of housing to the west of Newport may result in delays to sites coming forward for development due to a potential over concentration in certain areas – with developer's potentially staggering and delaying developments coming forward so as not to dilute the housing market.

Furthermore, there is a need to ensure that the proposed allocations provide for all sectors of the housing market. It is considered that the Newport LDP fails to provide for the upper end of the market – where smaller, semi-rural sites would be more appropriate and cater for market requirements more appropriately. The proposed development at Christchurch, Newport particularly seeks to provide for such needs, through the provision of a very high quality, low density, 'executive' style residential development – which will likely result in significant economic benefits through attracting / retaining certain types of buyers (senior management for example).

It is noted that the currently proposed Policy H1 will likely need to be revisited in order to ensure that the Plan accounts for sites which have had planning permission granted since publication of the Plan submitted for Examination, and other sites having previously had planning permission but which have now expired.

As discussed at Hearing Session 2 – Provision for Housing, an initial figure of 300 less units was discussed. At this Session, the Council suggested that this would have the effect of reducing the contingency / flexibility allowance from circa 12% to 9%.

It is therefore considered that this potentially significant shortfall in housing numbers needs to be responded to, with additional sites allocated in-lieu – which should also look to respond to concerns regarding the focus on brownfield land to the east of Newport (as discussed further above).

It is vital that this deficit is 'made up' in order to retain an important flexibility and contingency allowance. The Council have assessed and determined 12% as the appropriate and sound level at which to provide a flexibility allowance. Accordingly, in view of this it is considered that this level should be maintained – as otherwise this may undermine the soundness of the Plan.

The allocation of the proposed site at Christchurch will therefore assist in making-up this likely deficit in housing allocations, through the allocation of an appropriate, deliverable site.

Is the site free from constraints and deliverable?

The proposed site is free from any significant constraints and would be clearly deliverable.

A Highways Assessment has been undertaken in support of the site and has been submitted alongside representations made to the Deposit LDP (in July 2013). This assessment confirms that the quantum of development proposed would not generate a significant quantum of traffic and that there would not be a material impact on the highway network. Additional pedestrian access points are also proposed to be provided, along with the potential to provide a new bus stop, in order to further improve the access and sustainability credentials of the site.

In terms of landscape impact, a landscape appraisal has been prepared for the proposed site, which was submitted alongside representations submitted to the Deposit LDP. The appraisal confirms that the site is be visually well enclosed and that there is the possibility of reinforcing and enhancing the perception of physical and visual enclosure through the implementation and establishment of new and additional planting, which once it begins to mature would supplement and complement the site's existing vegetative screen.

The proposed residential development within the site would therefore be perceived as a discrete and relatively small extension to the existing urban area of Christchurch; one physically and visually contained by the existing and proposed vegetation within the site. The residential development on the site would be consistent in terms of scale, form and massing to that already existing within Christchurch and in particular to the area immediately south of the site. The proposed development would not therefore cause any unacceptable harm of the landscape.

There are no other significant constraints to the development of the site which could not be appropriately dealt with through the submission of a planning application. In particular, the site is not in an area of flood risk, the site is not affected by contamination constraints and ecological impacts could be appropriately managed – particularly through the retention of mature trees / hedgerows around the periphery of the site.

The site is confirmed to be deliverable, which is demonstrated by the fact that it is being promoted by Redrow Homes, a national house builder. Furthermore, there are no economic constraints which will affect the development of the site within the plan period and there are no restrictive covenants relating to the use of the land.

In view of this, it can be confirmed that the site is deliverable, and that the site could be brought forward within the early part of the Plan period.

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

The Deposit LDP confirms that the vision of the Plan is as follows:

"As a gateway to Wales, Newport will be a centre of regeneration that celebrates its culture and heritage, while being a focus for varied economic growth that will strengthen its contribution to the region. It will be a place that people recognise as a lively, dynamic, growing City, with communities living in harmony in a unique natural environment." (Paragraph 1.7)

Furthermore, the Plan goes on to confirm that:

"A sustainable development strategy is proposed, with a focus on regeneration, building on the culture and heritage of the City, seeking to maximise the use of previously developed, brownfield land. The City is currently undergoing significant changes." (Paragraph 1.12)

The strategy of the Plan therefore seeks to provide for sustainable development and for economic growth, in order to strengthen the contribution of Newport to the region.

The proposed development of the site at Christchurch, Newport will fit with the Plan strategy, in that it will provide a sustainable development, which will also have a positive impact on economic growth within Newport. In doing so, the development will assist in meeting the Plan's regeneration aims and objectives.

In terms of sustainability, the site is located directly adjacent to the settlement limits of Christchurch within the currently adopted Newport Unitary Development Plan (2006). Accordingly it occupies a position which is within close proximity to the existing settlement, which provides for a range of services and facilities.

In addition, the site is located within close proximity to both Caerleon, situated circa 0.8 miles to the north-west of the site where a wide variety of shops and services are available, and the convenience shop, public house and other services located on Chepstow Road, circa 0.5 miles to the south-east of the site. The proposed development would therefore assist in ensuring the continued viability of the existing shops and services within the locality.

A bus stop is also located within Christchurch, which has frequent (half hourly) services. In this context, the site is considered to be located in a relatively sustainable location, where development would be appropriate and would comply with the Plan's strategy.

As confirmed within previous submissions to the Deposit LDP, the proposed development seeks to provide a low density, high quality scheme of 'executive' style housing. It is considered that the current LDP fails to appropriately provide for sites to provide such housing – both in terms of site location and the form and nature of the development proposed. The proposed development will therefore provide for a specific housing need, which is currently in high demand in semi-rural areas such as Christchurch.

Sites which are appropriate to provide for such 'executive' style housing are limited, but this site provides such a location which allows for this opportunity. The proposal will seek to attract senior managers / directors etc to the area, which has been demonstrated to have a positive impact on the local economy.

In particular, research shows and evidences is that there is an accepted link between high quality 'executive' housing and the economic prosperity of an area - with the former playing an important and accepted role in stimulating the latter. Furthermore, there is a need for such housing in all areas, but particularly where regeneration is a key aspiration, as is the case in Newport.

The proposed allocation and development of the site for high quality, executive housing will therefore assist in meeting the Plan's aims and objectives in terms of regeneration and economic growth. Likewise, this will assist in ensuring that the Plan provides for the quantity, quality and variety of housing provision meet the needs of the population – which is a key objective of the Plan itself.

Having regard to the above, the development of the site is considered to comply with, and contribute to, the following objectives of the Plan (as set out within the Deposit LDP):

- Objective 1 – Sustainable Use of Land
- Objective 2 – Climate change
- Objective 3 – Economic Growth
- Objective 4 – Housing Provision

Accordingly, the allocation of the proposed site at Christchurch, Newport is considered to fit with the Plan's strategy, and moreover is considered necessary in order to contribute to some of the key objectives of the Plan and to ensure its soundness.