NEWPORT LOCAL DEVELOPMENT PLAN EXAMINATION

HEARING SESSION 19

HOUSING PROVISION AND DELIVERY – DISCUSSION OF THE COUNCIL’S RESPONSE TO MATTERS ARISING AT HEARING SESSIONS 2 & 3

SUBMISSIONS ON BEHALF OF REDROW HOMES
HEARING SESSION 2 – HOUSING PROVISION

The Council consider that there is only a shortfall of 256 units in the land supply and propose to overcome this shortfall by increasing the windfall allowance for sites above 10 units from 75 to 95 per annum. Redrow Homes maintain its position that the shortfall in supply is far greater than 256 units but do not wish to repeat the evidence submitted to Housing Sessions 2 & 3.

The Council has used the 2006 - 2011 period to justify increasing the windfall allowance and in paragraph 3.2 state that “This is consistent with TAN1 (para7.1.5) which notes that a 5 year period provides a sufficient basis for reviewing past windfall trends” Paragraph 7.1.5 of TAN1 actually states is that the windfall allowance should be “based on the contribution (from recorded completions) that such sites made to housing provision in the area over the last five years”. It is evident from the table in paragraph 3.2 that the contribution from windfall sites has fallen from the peak in 2007/08 and it should be possible to calculate the contribution from windfalls over the 2011-2013 period in accordance with the requirement of TAN1. As the UDP was adopted in 2006 there would have been no updated H1 Table after that date and is therefore difficult to understand why the contribution from windfalls over the 2011-13 period cannot be calculated accurately.

We do not agree that there will not be an element of double counting of large windfall sites particularly in the early part of the plan period. The Council are now proposing a windfall allowance of 95 per year from 2013 and have also updated Table H1 to include all planning permissions granted since 2013. With such a high dependency on existing commitments to avoid any double counting we do not consider it appropriate for the large windfall allowance to come into effect until at least after 2016.

With regard to the reference to the Welsh Government’s Vibrant and Viable Places Project in paragraph 3.11 it will only justify windfall allowance if additional/unidentified sites come forward as a result of it. If the new investment is targeted at existing identified sites then little weight can be placed on it for the justification of increasing the windfall allowance. For example in the Table in paragraph 9.1 Site H24 identifies 24 units at 30-33 High Street and the Council’s comments state that it forms part of the Vibrant and Viable Places Project. As the site already forms part of the land supply the Project will not be bringing forward a windfall site in this instance.

In relation to the Network Rail site (paragraph 5.1) no indication has been given of when the site will be made available and marketed for development and it is considered inappropriate to allocate the site which inevitably be categorised in 3(i) in the JHLAS. If the site were to come forward at a later date there is unlikely to be any objection to the principle of development of the site and providing any technical difficulties such as noise mitigation can be resolved it would be considered as a windfall site.
SESSION 3 – HOUSING DELIVERY

Redrow Homes consider that the LDP does not provide a sufficient range and choice of housing sites to deliver the housing requirement and if additional sites are not allocated then at the very least there ought to be appropriate trigger points which would allow the release of reserve sites.

With regard to the updated information regarding the Section 106 sites (paragraph 9.1) there seems to have been little activity on sites H31 and H32 since 2009 and they should therefore be discounted from the land supply.

In relation to paragraph 11 and the introduction of effective monitoring indicators and triggers no justification is provided for the substantial reduction in the completions required by 2016 from 3,930 units (page 127 of Deposit LDP) to 2008 units. Paragraph 11.1 states that one of the monitoring targets will monitor the housing delivery rate against the employment/growth forecasts which is in accordance with the Plan’s strategy. The table in 8.1 which sets out the housing completion rates consistent with the employment growth–based household forecasts indicates 3200 completions by 2016. The reduced figure is also inconsistent with the following:-

(i) Appendix 5 Delivery and Implementation Table - 3091 completions by 2016 (including windfalls)
(ii) Appendix 6 Housing Trajectories – 3007 by 2016 (805 completions 2011-13 plus residual requirement of 3x734)
(iii) The annual average LDP requirement – 3450 by 2016.

To be consistent with the strategy of the plan the housing monitoring trigger for completions by 2016 should be a minimum of 3000 dwellings.