

NEWPORT LOCAL DEVELOPMENT PLAN EXAMINATION

Session 2 - Housing Requirement and Supply

HBF Comments

Please find attached, comments from HBF on the proposed land supply/housing requirements in the LDP.

We believe this submission, along with our Deposit representations, is sufficient to cover our concerns on these matters that are discussed in other sessions.

Hearing Session 2: Provision for housing

Main discussion matters

1. Housing requirement - Is there a sound rationale for the identified housing requirement of 10,350 new homes over the Plan period?

We believe this is soundly based.

2. Spatial distribution of housing provision and site selection

- What rationale underpins the Plan's approach to the spatial distribution of housing provision over the Plan period? What factors have been balanced in coming to this view?
- Is there a sound rationale for the level of reliance on brownfield land to deliver the housing requirement?

We do not believe this has been considered properly. We believe the issue of development viability has not been given sufficient consideration when it comes to the reliance on brownfield land. It is clear that the LDP viability assessment has been conducted on the basis of an 'unconstrained' site and therefore, bears no relationship to the proposed LDP strategy. As a result of this, we believe the reliance on brownfield land will have significant implications to the cost of developing housing sites and also on the delivery of section 106, affordable housing and other developer contributions, which in turn will have an impact on the deliverability of housing development in general over the plan period.

- What evidence demonstrates that all housing allocations are soundly based on a methodical, consistently applied, robust and objective site selection process, taking into account considerations concerning site suitability, availability and deliverability?
- Do the housing allocations and policies provide a sufficient range and choice of housing sites and opportunities across the Council's area, in locations consistent

with the objectives of the Plan? Is the Plan sound as regards the approach taken to new housing provision in settlements outside the main Newport urban area?

- What risks or problems has the Council identified associated with the level of reliance on brownfield sites – and how does the Plan seek to deal with these?

We believe there is a risk with the reliance on the current land supply in the plan to deliver the numbers proposed, particularly given the strategy relies so heavily on constrained land. As we point out in our Deposit representations, the LDP has aspirations to deliver a significant increase in growth, in order to attract investment and create jobs in the area. In this respect, we believe that with such an ambitious strategy it is important to ensure there is a range and choice of sites that are viable and deliverable to ensure housing growth can be supported and increased.

Providing a range and choice of viable sites will also be key to ensuring developers are attracted to the area. Currently it seem the LDP strategy is totally reliant on the capability of a small number of large sties do deliver a significant number of homes over the LDP period. This raises concerns, given that the evidence to demonstrate the capacity of these sites to deliver as proposed has (in our view) not been forthcoming. As such, in order to ensure the LDP delivers on its objectives, we believe it is imperative the LDP offers a variety of viable and deliverable sites for development and does not rely too heavily on a small number of large allocations to underpin the delivery of the growth strategy.

3. Land supply

- What evidence demonstrates that the allocated sites are capable of yielding the identified housing target?

As we suggest above, we do not believe this is sufficient evidence to demonstrate deliverability in this regard.