

**Walters Land (Rogerstone) Limited (reference: 3520)  
Jubilee Park (former Alcan/Novelis site), Rogerstone  
Newport Local Development Plan Examination**

**Hearing Session 2: Provision for housing**

**10.00am Wednesday 2 April 2014**

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

*Does the demographic and economic-led housing forecast (SD55 NLP Assessment of Housing Requirements Paper) provide a robust and credible basis for setting the Plan's housing requirement?*

*Does the Experian Business Strategies economic growth forecast of 7,400 new jobs created in Newport between 2011 and 2026 provide a suitably reliable and authoritative basis for estimating economic growth over the Plan period?*

*Does the evidence constitute a rational basis for departing from the 2008- based WG population and household projections, having regard to the factors identified in PPW at paragraph 9.2.1?*

*Do the latest WG projections (expected end February 2014) necessitate any adjustment of the identified Plan housing requirement?*

*Would an overestimation of housing need in the Plan lead to problems in terms of implementation and realistic monitoring?*

**Savills Response**

In response to the provision of housing in the County, the representations made on behalf of our client, Walters Land (Rogerstone) Limited (Walters), to the Revised Deposit Local Development Plan (RDLDLP) questioned the level of housing development proposed by the Council. This was higher than the 2008 based household projections. To us no clear explanation or justification for this proposal was provided.

The level of housing proposed was higher than the 2008 based figures, which supported an increase of about 7,000 new households (over the period 2011-2026). The 2011 based projections (released at the end of February this year) show a slower and smaller reduction in household size and support an increase of 8,000 new households. The Council continues to plan for 10,500 – which is over 30% higher than the Census based figure. Once an allowance for flexibility is added, the level of provision rises to about 50% more than the 2011 based projections support.



We can see no reasonable explanation for this position or the deviation it proposes from very up to date projections. Without this justification the latest census information should shape the Council's housing requirements and what it needs to plan for. In Newport, the latest household projections figures (2011 based projections) say that provision should be made (before any contingency) for about 8,000 new homes.

As we have said in other submissions, we understand that the need for a contingency will be considered by each authority according to the authority and the circumstances it finds itself in. We broadly agree with the need for one in Newport, and so long as the right figure (8,000) is used as the base for housing requirements we have no objection to this figure being in the 10% range.

Setting the right number is important for a number of reasons. To increase development beyond that level presents a number of risks. The most critical of these is the allocation of bad or worse sites that are not needed or can be reserved or kept for later times when they are. Over allocation also sends confusing messages to a market and an industry with finite capacity and has implications for infrastructure delivery (given that development and land value will be asked to fund it).

These risks were set out in our submissions to the RDLDP. The planning system recognises them and specifically the need to prioritise the redevelopment of previously developed land before releasing further Greenfield sites. This sequence of development is retained within the most recent version of Planning Policy Wales (PPW) and has significant weight in Newport because of the range and choice of deliverable brownfield sites that are being actively promoted by developers.

## **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?*

*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?*



## **Savills Response**

We consider that the Plan's overall spatial strategy is basically sound. It makes an attempt to focus on and prioritise the swift and successful redevelopment of previously developed land.

This reflects Newport's considerable experience in major regeneration projects. The County contains a number of well located, large brownfield sites (capable of delivering a substantial amount of growth and a full mix of new homes) that are either underway or will come forward during the plan period. On this basis – and because the market is becoming more sophisticated at the same time that regulators are becoming more responsive and developers more imaginative – the rate of development is likely to increase.

The Council's rationale is therefore aspirational and realistic – as are the plan's objectives and many of the allocations it contains. This could be clearer and firmer – and emphasise with some pleasure that previously developed land formed the cornerstone of the plan - but as a starting point it is broadly correct.

Close contact with the Council during the determination of the outline planning application at Jubilee Park and ongoing discussions following its approval has ensured that the Council has a very good understanding of the site and its capacity to deliver. This is discussed further in the next section.

This explains why we consider the Council's strategy with respect to previously developed land should be stronger. We continue to recommend that the commitment to prioritising, supporting and accelerating the use of previously developed land before Greenfield sites should feature within the plan's objectives.

### **3. Land supply**

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

*Does the Plan identify with sufficient clarity how it makes provision for 11,622 units in order to deliver the Plan requirement of 10,350 units – have dwelling completions on large sites from 1.4.11 to 30.9.12 (518 units) been excluded from the H1 existing commitments site schedule?*

*How have questions of housing mix and density on allocated sites been approached? What assumptions regarding this are reflected in the identified allocated site capacities?*

*On what basis has the anticipated yield of each site been calculated?*

*Have significant site-specific constraints (e.g.: flooding; ecological or environmental constraints; topography; access/infrastructure requirements) been properly taken into account in each case? What evidence demonstrates this?*

*Is Policy H1 sufficiently clearly worded as a housing site allocation policy? Are the anticipated total capacities/unit yields for each site identified in policy H1 intended to operate as maxima, or simply best estimates? Does policy H1 need to be clearer on this?*

### **Savills Response**

Outline planning permission for the comprehensive redevelopment of Walters' Jubilee Park scheme (LDP proposal site reference H54) was granted on 6 August 2013. The scheme (and the permission) includes provision for about 900 new homes – including apartments and houses of all types, together with a new school, riverside park and local centre.

Our submissions to the RDLDP provided only some information on the position that Walters had reached on the site. Since then a substantial amount of work has taken place on site, including:

- Remediation works – the site is contaminated and Walters Land Limited (WLL) who specialise in remediating and preparing brownfield sites for development has been working on site since late 2013. This work is still on programme with remediation of the first phase nearing completion. Concrete breakout of phase 2 has also started.
- Infrastructure and landscaping – the reserved matters application for the first phase of works to deliver the main access to the site, the internal roundabout, part of the site loop road and associated landscaping (including the area around the on site pond) has been submitted to and approved by the Council. This work is due to commence by the end of March 2014 (in the next week or so).
- The reserved matters for the second phase of infrastructure and landscaping (continuing work on the internal loop road) has also been submitted to the Council. Technical approval is due very soon to allow work to continue without delay.
- The reserved matters for the first phase of housing development (to be delivered by Bellway, Taylor Wimpey and Linc Cymru) has also been submitted (or will be very soon) for approval. The objective is for the first houses to be built late summer/early autumn this year. This first phase of housing will deliver approximately 300 new homes.

This provides confidence to the Council that Jubilee Park can yield what is expected of it, that there are no constraints that cannot be overcome and that it can deliver a comprehensive range of properties of various types and tenures.

The fact that this can be achieved reliably because of the company that is behind the redevelopment of the site is equally important. Walters is a land development company with a long and successful track record in regeneration and development. It has already invested heavily in the site having bought the site to develop. The immediate start on site and progress made (as identified above) demonstrates the company's intentions and capabilities.



Walters will also act as master developer for the site, and its sustained interest in the development of the whole project, will mean that its intention to commence quickly will be matched by its commitment to deliver high quality development based on the principles and proposals that run through the outline permission.

As a result, the Council is right to rely on Jubilee Park to provide a substantial quantity of development during the plan period. There are also significant qualitative benefits associated with the initiative which will see homes built in an attractive environment on a site with a series of challenges. Despite its size, the scheme is also very popular locally and with the Council on all levels. In many ways it shows exactly what modern brownfield redevelopment can achieve (and how quickly it can do this).