

## **NEWPORT LOCAL DEVELOPMENT PLAN EXAMINATION**

### **Session 3 - Housing Delivery**

#### **HBF Comments**

Please find attached, comments from HBF on housing delivery

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

#### **Housing delivery issues in general**

*We set out, through our Deposit representations, our concerns on the delivery rates proposed over the LDP period. We do not wish to repeat these concerns here, however, below we provide an updated calculation of where we believe the land supply could fall short of delivering the overall housing requirement.*

*We have worked together with HBF members to quantify what the shortfall might mean for the 5 year supply. The table within Appendix 1 below sets this out.*

*As you can see from the table in Appendix 1, if we take a more realistic view of the delivery rates on the 5 sites in the table, there could potentially be a cumulative shortfall of 2075 dwellings over the plan period.*

*In terms of the sites in detail, we would comment as follows:-*

#### **Glan Llyn**

*In terms of Glan Llyn, we would prefer to consider this as one site for the purposes of identifying delivery rates. In this respect, Persimmon and Charles Church are currently developing at 60 per year, with the site due to be completed in 2017/18. Similarly the St Modwen section of the site is due to be completed in 2015/16. Apart from this, there are no other developers involved in the site.*

*In terms of the remainder of Glan Llyn as a total, it is proposed to deliver 4000 units, of which from 2012, 2748 are proposed to be delivered. Therefore, from 2013 to 2026 the site is proposed to deliver 211 per year. In this respect, we do not believe this is a realistic delivery expectation from the site. In order to achieve this level of development (assuming this level of development is possible from a site in this area), would require 7 different outlets, based on the current development rate of 30 per year from Persimmon and Charles Church. This would mean out of the major developers operating in Wales (Redrow, Barratt/David Wilson Homes, Bellway, Taylor Wimpey) you would need all to be active on the site at the same time. However, even then with all developers operating at 30 per year, this would only yield 150 per year, some 61 units short of the required build rate.*

*Notwithstanding this, it is highly unlikely that all major developers will be operating on this site. From a commercial perspective, this would be impractical. Furthermore, not only is there currently no interest from any other developers on this site, there is also no evidence that such interest might be forthcoming. In this respect, we have sought comments from all major developers with respect to their intentions on the site and Barratt, Redrow, Taylor Wimpey and Bellway have all confirmed that they have no plans to develop on Llanwern Steelworks in the near future. In light of this, we do not believe the development rate proposed for Glan Llyn in the LDP is realistic and should therefore be reconsidered.*

*In terms of the above, we believe a more realistic development rate should be assumed. In this respect, our suggestion is for a maximum rate of 120 per year. We believe this in itself would be optimistic, however would allow some 'benefit of the doubt' with respect delivery rates in the future. In suggesting this rate however, we believe the site should be monitored closely for forthcoming completions to ensure its contribution to the land supply is not overestimated.*

### **Eastern Expansion Area and Woodland Site, Ringland**

*In terms of the Eastern Expansion Area and adjacent sites, given their proximity to Glan Llyn, we believe the contribution from these sites is likely to be compromised to a certain degree by development at the Glan Llyn site. As such, and given our comments on Glan Llyn, we do not believe it is reasonable to expect such a high delivery rate from these sites. In light of this, we believe it would be far more appropriate to assume a contribution (similar to the output of one developer on these sites), i.e. producing 60 per year, until we have more information on developer interest and more evidence to demonstrate that the market in this area can sustain an increase in delivery rates, in addition to the development at Glan Llyn.*

*In light of the above, we believe the potential housing supply trajectory given in Appendix 1 would be a more reasonable assumption to make with respect to housing delivery. However, as can be seen from the table, this would result in a cumulative shortfall of 2075 units at the end of the plan period, which clearly needs to be addressed by increasing the supply of viable and deliverable sites in the LDP.*

### **Additional Concerns**

*We do have some further concerns with the land supply, with many of the current commitments being allocated in previous plans without any sign of development, even in better market conditions. These concerns were expressed through our Deposit representations. However, following this, there are also sites that now have lapsed permissions, which clearly need to be recognised in terms of their potential contribution to the land supply in the LDP.*

*In light of the above, we believe a thorough appraisal of the land supply needs to be undertaken, in order to ensure there is sufficient viable and deliverable land available to support development over the LDP period.*

### Appendix 1 – Housing Trajectory

	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26
Completions	15	45	60												
Persimmon				60	60	60	7								
St Modwens app				10	38										
Llanwern						60	120	120	120	120	120	120	120	120	120
EEA & Woodland site, Ringland					30	60	60	60	60	60	60	60	60	60	60
Total	15	45	60	70	128	180	187	180	180	180	180	180	180	180	180
Cumulative Total	15	60	120	190	318	498	685	865	1045	1225	1405	1585	1765	1945	2125
Requirement	280	280	280	280	280	280	280	280	280	280	280	280	280	280	280
Shortfall	265	235	220	210	152	100	93	100	100	100	100	100	100	100	100
Cumulative Shortfall	265	500	720	930	1082	1182	1275	1375	1475	1575	1675	1775	1875	1975	2075