

WELSH GOVERNMENT

Examination Hearing Statement

**NEWPORT
Local Development Plan Examination**

Hearing Session 3

Housing Delivery

03rd April 2014

(Session 3): Housing Delivery

1. Expected housing delivery rate

What is the year-by-year trajectory of housing numbers (i.e. new units per annum) that the Plan seeks to deliver through the Plan period? Does the intended delivery rate vary during different phases of the Plan?

This is for the local authority to answer. We note that Chapter 13 of the Revised Deposit Plan and the supporting Delivery and Implementation Paper only set out delivery rates in terms of three five year phases.

In addition, the authority should clarify how the lower than anticipated completions in the first three years of the plan has affected how the authority demonstrate a five year land supply.

What is the rationale for this delivery trajectory; and what evidence suggests that it is realistic?

It is important that the plan makes provision for and enables delivery of a range and mix of sites that it itself has identified. Ideally, a simple housing trajectory would assist all parties to understand and consider the ability of the sites contained in the plan to be delivered is achievable. Lead in times for larger sites, the inter-relationship between such sites, the relationship of potential constraints and infrastructure/funding and assumptions for small/windfall sites should be considered.

The authority has an challenging housing target; therefore it is imperative that annual completion rates are delivered as expected. This is to ensure that a five year supply can be maintained.

It is also vital that the monitoring framework includes key triggers and action points so that any significant shortfalls do not arise and that appropriate action can be in place in advance to avoid such a situation. It is considered that the monitoring framework has some shortcomings which will be discussed at the relevant session. The flexibility allowance and how this relates to delivery should also avoid this scenario.

If, after careful consideration of the evidence, the housing trajectory highlights under-delivery in the early years of the plan, appropriate alternative sites should be identified to remedy this deficiency. Such sites should align with the spatial strategy, be based on principles of sustainability and deliver on the key issues identified in the plan.

Does this trajectory fit with the phasing of development for individual allocated sites as set out in the Delivery and Implementation Table (pp133-136)? If not, why not? Does this undermine the consistency, coherence and effectiveness of the Plan?

This is for the local authority to answer.

2. Evidence that the Plan's sites will deliver.

What evidence demonstrates that the Plan's allocated sites can be relied upon to deliver the right mix and numbers of units through the Plan period (i.e. in accordance with the delivery rates sought)?

What assessment has been undertaken of likely development trajectories for each allocated site, taking into account factors such as:

- **land condition and remediation/site preparation requirements;**
- **site infrastructure requirements;**
- **acquisition, scheme design and approval process;**
- **developer's sales expectations and construction/completion rate intentions, where a developer is in place?**

This is for the authority to answer.

A high proportion of the housing anticipated to be delivered is on sites already having planning permission. What development progress has been achieved to date on each of these sites? Does this provide confidence that housing at an appropriate rate will be delivered on these sites?

It would be helpful if the authority could provide an update on dwelling completions and commitments for the hearing session. The H1 Land Supply Components Table (Page 64) currently shows the period 01/04/11 – 30/09/12. This will allow representators to understand progress to date. We have previously commented that the 2013 JHLA (SoCG) indicates a shortfall in the required completion rates.

We note that 69% of the housing provision is either completed or committed. It is evident from the components of supply (H1 Housing Site Tables) that in addition to the 563 units already completed to date, 7,469 units are either under construction, have planning permission or are subject to the signing of a S106 agreement. This represents nearly 65% of the total housing provision. This would appear to demonstrate that there is considerable activity and interest from applicants and developers in Newport.

What evidence is available to demonstrate that a 5 year housing land supply can be maintained, given the housing delivery rate sought by the plan and the heavy reliance on sites which are already available for development?

All LDPs should demonstrate that they can provide a 5 year housing supply from adoption and throughout the plan period, in accordance with PPW (paragraph 9.2.3). It is for the authority to demonstrate the plan complies with national policy.

What flexibility measures are built into the Plan to enable an appropriate

response if allocated sites fail to deliver housing at the anticipated rate?

The WG has indicated that a notional flexibility allowance of 10% may be appropriate to allow for the non delivery of sites and unforeseen issues. Each plan should have a level of flexibility that is appropriate for the area, having regard to the issues and the deliverability of sites in the plan period, this could be a higher or lower figure than the 10% suggested by Welsh Government.

We note that Policy SP10 and Policy H1 allows for a 11% flexibility allowance over the plan period. In addition, we note there is an additional 1303 units which could come forward outside of the plan period. Of this 'additional capacity' we note there is additional capacity at Glan Llyn (1200 units) which could come forward should build rates increase above the anticipated rates.

In light of the challenging housing requirement the Welsh Government considers that it would not be appropriate or helpful to increase the overall housing provision in the plan. This could jeopardise the delivery of strategy, key regeneration sites and impact negatively on the five year supply. However, if through the examination process and consideration of the evidence it is decided that more deliverable sites are required, these should be a substitute rather than in addition to, the overall housing provision.

Any new sites would need to be in accordance with the spatial strategy and deliverable in the plan period. The Inspector can include sites, supported by the appropriate Sustainability Appraisal; however the outcome should not result in a different plan.
