

**Newport Local Development Plan
Examination
Hearing Session 11: Strategic
Development Site - Eastern
Expansion Area (Policy SP11)**

Submission on behalf of Gallagher Estates
(Representation No. 1401)

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1. Introduction

- 1.1 This Statement has been prepared on behalf of our clients, Gallagher Estates, in relation to Hearing Session 11 of the Newport Local Development Plan (LDP) Examination. It addresses the main discussion matters identified by the Inspector that are considered relevant to our clients interests and have not been covered fully by previous representations.
- 1.2 By way of context our clients own circa 55.81 hectares of land at Llanwern, which is allocated in the adopted Unitary Development Plan (UDP) and emerging LDP as part of the Eastern Expansion of Newport. The site, known as Llanwern Village, also benefits from extant outline planning permission for up to 1,100 new homes (Ref: 13/0806).

2. Main Discussion Matters

1. Identity, extent and concept of Eastern Expansion Area (Policy SP11).

Is the extent of the Eastern Expansion Area and the individual allocations to which it relates clearly and consistently identified in the Plan? In particular:

Has the concept and extent of the Eastern Expansion Area changed from that set out in the UDP and the supporting supplementary planning guidance (May 2007)? If so, in what ways and why?

- 2.1 The concept and extent of the Eastern Expansion Area set out in the UDP and SPG is reflected in the extant outline planning permission for Llanwern Village. The only material change affecting Llanwern Village directly is the proposed allocation of a gypsy and traveller site at Ringland Allotments. The proposed development moves away from the principles firmly established at the time of the original UDP allocation and SPG by introducing built form to what was intended to be a green buffer. This was an important principle of the original concept for the Llanwern Village element of the Eastern Expansion Area. This matter has been addressed in our submission relating to Hearing Session 5.

Is the SPG intended to continue to articulate the guiding development principles for the Eastern Expansion Area, as indicated in paragraph 2.37? If so, does the Plan need to make more detailed reference to the content of the SPG?

- 2.2 Given that the extant outline permission was developed in line with the SPG it is not considered necessary to make more detailed reference to its content (relating to Llanwern Village) in the LDP. Going forward individual reserved matters applications will be guided by the principles set out in the outline planning permission and the soon to be permitted Design Code.

Is the full extent of the “mixed use, sustainable urban expansion area” properly shown on the proposals map? Should the policy wording (referring to land centred on the redundant part of the steelworks) and the delineation of SP11 on the proposals map (relating only to land west of Llanwern village), be amended so as to be mutually consistent and unambiguous?

- 2.3 The wording of Policy SP11 and the site boundaries shown on the proposals map should be consistent. As it stands, reference to Policy SP11 on the Proposals Map appears to relate to Llanwern Village only and not the remainder of the Eastern Expansion Area.

- 2.4 We support the City Council's proposed changes at Paragraph 2.37, which adds reference to Llanwern Village in the supporting text to Policy SP11. The original Revised Deposit LDP failed to reference Llanwern Village as part the supporting text.

Should the H1(3) Llanwern village allocated site boundary depicted on inset map 9 be enlarged to include the areas of integral amenity open space, and the site area noted in policy H1 increased from 44ha to 55.81ha?

- 2.5 The Proposals Map and site area set out in Policy H1(3) should be amended to reflect the total area of the Llanwern Village development. The extant outline planning permission extends to 55.81 ha and is therefore the overall development area considered acceptable to the City Council.
- 2.6 The LDP allocation should be in accordance with the extant outline planning permission for the development. We are not aware of other instances where allocations in the LDP exclude areas of public open space from the defined site boundary. There is no sound rationale for excluding the areas of public open space from the site boundary depicted in the LDP.

2. Delivery of Eastern Expansion Area development.

What evidence demonstrates that H1(3) and H1(47) will deliver the anticipated level of housing (about 3750 units) during the Plan period?

- 2.7 Our client provided indicative delivery rates for Llanwern Village (H1(3)) as part of the Joint Housing Land Availability Study (JHLAS) process. As indicated in our statement relating to Hearing Session 3, the delivery rates provided by our client were based on the proposed gypsy and traveller site allocation at Ringland Allotments not being taken forward by the City Council. If this allocation is retained in the LDP the delivery rates would be significantly affected.

Scenario A – Without Ringland Allotments Allocation

- 2.8 If the proposed allocation at Ringland Allotments is not taken forward by the City Council our client is confident that Llanwern Village will deliver 1,100 units over the plan period. The figures provided as part of the JHLAS process were based on the following assumptions:
- The delivery of 40 units per outlet (although this could increase later in the plan period).
 - Between one and three outlets being on site at any one time.
 - Commencement on-site in late 2014.
- 2.9 Our client is currently working with the City Council to seek the discharge of pre-commencement conditions, approval of initial reserved matters applications for enabling infrastructure and technical approvals. Current progress is set out below.

- Reserved Matters for the First Phase of Infrastructure relating to the southern half of the site (LPA Ref: 13/1024). Approved 8 January 2014.
- Discharge of Condition 21 - Ecological Management Plan (LPA Ref: 13/1223). Approved 16 January 2014
- Discharge of Condition 23 - Contamination Scheme (LPA Ref: 13/0990). Approved 16 January 2014.
- Discharge of Condition 29 - Programme of Archaeological Work (LPA Ref: 13/0990). Approved 16 January 2014.
- Discharge of Condition 35 - Details of work and mitigation in relation to candidate Regional Important Geological and/or Geomorphological Site (LPA Ref: 13/0990). Approved 16 January 2014.
- Discharge of Condition 5 – submission of a Design Code following discussions with the Design Commission for Wales. Future Reserved Matters applications will be in accordance with this Code. Submitted 11 March 2014 and expected to be discharged by 11 May 2014.
- Discharge of Condition 15, 20, 23 and 24 – submission relating to the drainage strategy for the development to be submitted imminently.
- Reserved Matters for the main roads and drainage for the whole site – currently being prepared and to be submitted in tandem with the discharge of Condition 15, 20, 23 and 24.

2.10 The relevant technical approvals are also being sought by our clients. Approval has been received in relation to Cot Hill and sign off is expected shortly in relation to Station Road. Details of the southern site have been submitted for S.38 approval. The drainage design for the southern site has also been submitted, feedback from Welsh Water is currently awaited.

2.11 As a result of the above, our client expects the site to be available to commence development before the end of 2014. Initial market interest has been gauged, but our client has not formally taken the site to the market given the uncertainties surrounding the proposed Ringland Allotments site. In light of this it is recognised that there may be some slippage in deliveries during the 2014/15 period. Our client is, however, confident that 1,100 units will be delivered over the plan period – if the proposed allocation at Ringland Allotments does not come forward.

Scenario B – With Ringland Allotments Allocation

2.12 As stated in our response to Hearing Session 3 and 5, our clients expect the proposed gypsy and traveller site allocation at Ringland Allotments to have a serious impact on the delivery of Llanwern Village. This applies whether the site is allocated for residential or transit use and as a contingency or for immediate use.

2.13 Whilst it is difficult to put an exact figure on the likely impact of the proposed allocation at Ringland Allotments on delivery, our clients anticipate that the output previously indicated through the JHLAS process could be halved. This is based on the following:

- Delivery rates per outlet being reduced to 30 units per annum; and
- A reduction in the number of outlets operating at any one time – expected to be a maximum of two rather than three.

2.14 The above assumptions are based on reduced selling prices and also a slower rate of sales as a result of the proposed allocation. The predicted impact on deliverability is based on Gallaghers own experience of the development industry and independent advice received from local agents (as previously submitted in relation to Hearing Session 5 (Ref: ED.009.6g)). This advice confirmed that the proposed allocation would have a significant bearing on how the national and regional housebuilders currently active in South Wales would appraise Llanwern Village as a suitable development opportunity. At best the responses indicated that the housebuilders would look to apply a significant discount to their figures to reflect the additional risk and a reduced rate of sale. A number of housebuilders also indicated that if the allocation was to go ahead they would not be interested in acquiring the site at all. It is recognised that these concerns are based on the perceptions of the house buying public, but this is expected to be sufficient to deter prospective purchasers.

2.15 As a result of the above, our client expects Llanwern Village to be more susceptible to competition from other housing schemes within Newport should the proposed allocation at Ringland Allotment be retained. This will impact on developer interest and sales rates – ultimately lowering the rate at which units are delivered across the plan period.

2.16 Our client predicts that the delivery trajectory for the next five years could be reduced to the figures set out below if the Ringland Allotment site is allocated as a gypsy and traveller site. In reality the figures could be significantly lower. There is a significant risk that commencement on site could be delayed until later in the plan period subject to developer interest.

Site Name	Total Capacity	Units Remaining	2013/14	2014/15	2015/16	2016/17	2017/18
Llanwern Village	1100	1100	0	30	30	60	60

2.17 Based on the trajectory above, it is expected that the site could deliver c.180 units over the initial five year period, rather than 360 units. The trajectory for the remainder of the plan period would also be affected assuming the number of units delivered per annum remained at c.60 rather than 120. As such, it is expected that unless developer confidence allowed a higher number of units per annum, Llanwern Village will not deliver 1,100 units by the end of the plan period. Again, this impact could be even greater if commencement on-site is pushed back further in the plan period.

Can adequate vehicular access be gained from the southern distributor road to the land west of Llanwern village? Is land to the west of the houses on Cox Hill needed to facilitate satisfactory access?

- 2.18 Land to the west of Cot Hill is not required to provide satisfactory access to the Llanwern Village development. This is clearly demonstrated by the fact that access from Cot Hill was determined as part of the outline planning permission for Llanwern Village. This permission was supported by a full suite of technical work, including an Environmental Statement (ES), demonstrating that the access from Cot Hill was suitable.
- 2.19 This was reinforced by the renewal of the outline planning permission in December 2013. The S73 application was supported by updated technical work, including an ES supplement, which again demonstrated that the approved access was suitable. No objections were received to suggest that this access was not suitable. It should also be noted that S.278 and technical approval has also been received in relation to the Cot Hill access/works. The access therefore benefits from all necessary planning and technical approvals.
- 2.20 Land to the west of Cot Hill is therefore not needed to provide satisfactory access to the Llanwern Village development. Development in this area would also introduce built form in what has always been intended to be a green buffer alongside the Southern Distributor Road (SDR). Any development in this location, as with the proposed gypsy and traveller site allocation at Ringland Allotments, would therefore be inconsistent with the City Council's intention to maintain a green link between Scotch and Hartridge Woods. This was firmly established at the time of the original allocation of Llanwern Village.

How will the community facilities required in conjunction with the major housing provision be delivered?

- 2.21 The community facilities required in relation to Llanwern Village were considered as part of the determination of the original outline planning permission. The requirements relating to the site, and the appropriate phasing, are secured via the extant S.106 Agreement and relevant planning conditions. The S.106 and relevant conditions therefore provide the mechanism to deliver the required community facilities, including a new primary school, village centre and public open space. Details will be included as part of relevant reserved matters applications.
- 2.22 As started above, the proposed gypsy and traveller allocation at Ringland Allotments is expected to have a significant impact on the deliverability of Llanwern Village. Reduced sales rates/prices and the effect on developer interest will also have a serious impact on the viability of the scheme. This could have a knock on effect on the agreed package of S.106 measures. If the proposed allocation at Ringland Allotments was to proceed it is likely that our clients would have to revisit the existing S.106 package with the City Council. This could have a negative impact on the delivery of the facilities referred to above.

3. Need for a north-south transport link at Llanwern (Policy SP16(v))

Is there a sound rationale for the proposed SP16(v) north-south link? In what way does proposing this vehicular link render the Plan unsound?

- 2.23 Our client maintains that the Llanwern north-south link is not required to be a full vehicular link. Whilst it may be desirable to the City Council, the link is not essential to the overall connectivity of the Eastern Expansion Area. Adequate vehicular and bus connectivity would be achieved between Llanwern Village, Glan Llyn and the wider area without the provision of a full vehicular bridge in this location.
- 2.24 Delivering pedestrian/cycle linkages only is considered more desirable given that it would encourage future residents of Llanwern Village to access the proposed railway station by means of transport other than car. The removal of the proposed vehicular link would also reduce the risk of 'rat running', which is more of a concern given the need for significant improvements to the existing road network in the vicinity of the proposed bridge.
- 2.25 Whilst provision is made in the Llanwern Village S.106 for a financial contribution towards the provision of a vehicular bridge, it remains questionable whether it is actually deliverable in this form. Our clients concerns are whether sufficient funding will be available to construct a vehicular bridge (together with the associated infrastructure improvements) and whether agreement has been reached with Network Rail regarding delivery of the bridge. A pedestrian/cycle bridge would be more cost efficient and easier to deliver, whilst maintaining the overall benefits of encouraging sustainable modes of transport.
- 2.26 The requirement for a contribution towards the north-south link is set out in the agreed S.106 agreement. It would therefore be a matter of discussion with the City Council through this process if the nature of link was to be amended.

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