

NEWPORT LOCAL DEVELOPMENT PLAN EXAMINATION

Hearing Session 19: Housing Provision and Delivery – Discussion of the Council's Response to Matters Arising at Hearing Sessions 2 and 3

10.00am Thursday 15 May 2014
Council Chamber, Civic Centre, Newport, South Wales NP20 4UR

Submissions made on behalf of
St. Modwen Developments Limited
by Savills (Reference: 1466)

The following statement has been prepared for session 19 of the LDP Examination. This additional session has been arranged as a result of the Council's response to 'Matters Arising' from hearing session 2 (provision for housing) and session 3 (housing delivery). The Inspector's questions (those relevant to St. Modwen) are repeated in italics before a brief answer is provided.

Housing Provision

Review and update table in Policy H1 of sites contributing to the identified overall housing supply of 11,622 units over the Plan period (i.e. identified requirements +12% flexibility allowance) in light of current evidence and points discussed during hearing.

Assess and evidence implications of additional sites identified as commitments for extent of reliance on windfall sites (above 10 units) as a component of overall delivery, demonstrating no resulting "double counting" of units as new commitments and as part of the identified windfall component

Response:

1. Paragraph 1.3 of the Council's response refers to a shortfall of 256 units (following their review of Table H1 of Policy H1) against the proposed overall land supply of 11,622. It is referred to in paragraph 1.1 of the Council's response that anticipated delivery rates at Glan Llyn is the main reason for the shortfall identified by the Council. Due to reasons discussed at the original hearing sessions, we strongly question whether in fact there is any shortfall. The small deficit is more than compensated for by a very high overall level of growth, which is considered ambitious.
2. On average an annual maximum total of 185 new homes has been agreed will be delivered at Glan Llyn, which we believe is realistic on the basis that there are three parts of the site being developed at one time with potential for a specialist provider too.
3. The Council's response in the table following paragraph 3.2 sets out that 'The Orb Works' delivered 55 units in 2010/11 and 'Lysaghts' a total of 76 in this time – both of which were delivered by only one developer on site. With this in mind, the delivery of an annual maximum of 185 units, with three main developers on site, on Glan Llyn could be considered a little cautious.

4. Regardless of this agreed position for Glan Llyn, the Council proposes to address this shortfall by widening the Council's windfall allowance from 75 to 95 units per annum. The justification given for Newport to do this appears reasonable. Enhancing this allowance would increase potential provision by 260 units over the 13 year plan period.
5. A review of potential delivery on existing sites (Monmouthshire Bank Sidings (H14) and Whitehead Works (H51)) included in Table H1 could see housing provision rise by a further 255 units based on their current rate of construction. This is discussed below:
 - Monmouthshire Bank Sidings (H14) – Table H1 states that only 390 units will be delivered on the site during the plan period. However, the full capacity of the site (575 units) can be delivered during the plan period. Thereby increasing provision by 185 units.
 - Whitehead Works (H51) – Table H1 states that only 330 units will be delivered during the plan period where there is potential for the full site capacity (400 units) to be delivered in the plan period. This would increase provision by a further 70 units.
6. As a result, there is potential for an additional 515 units to be delivered from windfall provision and more realistic delivery rates at Monmouthshire Bank Sidings and Whitehead Works. These additional units would more than compensate for the shortfall referred to in the Council's response.

Housing Delivery

Provide evidence to demonstrate that the identified housing land supply is sufficient to deliver housing through the Plan period at a rate consistent with the employment growth-based household forecasts on which the Plan is founded.

Response:

7. The graph (on page 9 of the Council's response) illustrates the economic growth forecast is high with the ambitious housing delivery rates shown to be even higher than that.
8. Whilst there may be sufficient housing land supply in the Plan to allow housing to be delivered at a rate consistent with employment-based household forecasts, future monitoring targets should also include economic trajectory so that if this reduces, the reduction is also tracked through to residential land supply.