

## NEATH PORT TALBOT LOCAL DEVELOPMENT PLAN EXAMINATION

### Hearing Session 3 & 4 (Matter 3): Housing Provision – Distribution and Amount

10.00am, Friday 13th March 2015 & 2.00pm, Monday 16<sup>th</sup> March 2015  
Committee Rooms 1&2, Port Talbot Civic Centre

Submissions made on behalf of  
**St. Modwen Developments Limited**  
by Savills (Reference: 0042)

The following statement has been prepared for Matter 3 of the LDP Examination. The Inspector's questions are repeated in italics before a brief answer is provided. There are clear connections between the responses to some of the questions raised and those provided for Matter 2.

**Key Issue: Is the amount of housing provision set out in the LDP realistic and appropriate and is it founded on a robust and credible evidence base? Will it achieve the relevant objectives of the LDP in a sustainable manner consistent with national policy?**

**Key Issue: Is the distribution of housing as proposed in the LDP realistic and appropriate and is it founded on a robust and credible evidence base?**

**Key Issue: Do the overall scale, type and location of the allocated housing sites achieve the relevant objectives of the LDP in a sustainable manner consistent with national policy?**

#### **Amount**

*Bullet 1: How does the amount of housing proposed relate to the most recent Welsh Government household projections?*

1. We can see no connection between the growth figures and the housing proposed in the plan. The proposed level (at 8,600 dwellings) is 3.7 times more than the 2011 based projections would justify. We understand that the 2011 based projections are only a starting point and have a health warning (regarding economic conditions and suppression of growth and demand) but this level of divergence is nonetheless very significant.

*Bullet 2: What is the methodology for translating the number of jobs into the number of homes required?*

2. No response. We find it difficult to follow but we are not experts in this field.

*Bullet 3: Are reasonable assumptions made in the growth model, for example with regard to economic activity rates and household size? What are the implications if they are not realistic?*

3. The growth figures do look aspirational and ambitious and that is a good thing. The target of creating 3,850 additional jobs over the plan period will be a challenge.

4. The Council and its advisors should be able to update the Inspector on the performance of the plan in the first 4 years or so – and this will be a useful reality check at this point in time.
5. If they are being achieved then that is good and encouraging. If they are not being achieved (and no catch up is likely over the remainder of the plan period) then the implications are significant because economic activity rates are the principal influence on the level of housing growth. On this basis – and simplistically - any reduction in job growth should be factored into the level of housing provision. This is why we say that monitoring economic growth and tracking it against housing provision (or supply) is critical.

*Bullet 4: What is meant by the terms ‘vacancy rate’ and ‘flexibility allowance’? Will these be reasonable and appropriate?*

6. No comment

*What percentage of the units identified for each 5 year period in the Housing trajectory will be built on previously developed land?*

7. The Council will be able to provide the relative and precise percentage of greenfield / brownfield land for each period. However, we continue to recommend that the commitment to prioritising, supporting and accelerating the use of previous developed land should feature within the Plan’s objectives and the housing trajectory ought to reflect this commitment.

*Bullet 5: How were the numbers of units on each site defined. What is the average density for sites in the Coastal Corridor Strategy Area and the Valley Strategy Area?*

8. No comment

*Bullet 6: What evidence is there as to when dwellings/sites will be completed? Will there be a 5 year supply of housing land throughout the plan period?*

9. With respect to the first part of the question, we can only speak for the Coed Darcy Strategic Regeneration Area and have provided evidence in our submission on Matter 2 to support delivery of the homes the Plan asks the site to provide. To avoid the need for cross referencing the bulk of what we said is repeated as Appendix 1 to this statement.

10. The second part of the question is for the Council to answer.

*Bullet 7: Are all the landbank sites identified in Policy H 1 in the 5 year supply? If not which sites are omitted; when and how will they be brought forward? What assurance can be provided that landbank sites will be delivered during the plan period?*

11. In addition to what has been said already (in response to bullet 6, on the basis of its comprehensive understanding of the site and the progress made to date, the Council can be confident that Coed Darcy 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.

12. The schemes sponsor, St Modwen Development Limited, has substantial experience in the delivery of large previously developed sites. The progress it has made demonstrates this and has been made in difficult conditions and at the start of the

redevelopment process for a very large site. The Council and its LDP should also emphasise (or at least not ignore) the qualitative benefits of the scheme and what it will achieve in providing a large number of new homes through the transformation (and recycling) of one of Wales largest single areas of previously developed land.

*Bullet 8: Policy SP7 makes provision for the delivery of windfall and small sites at a rate of 55 and 54 units pa respectively. What rate of delivery has been achieved since the beginning of the plan period? Taking account of past trends are windfall and small sites allowances realistic?*

13. No comment

### **Distribution**

*Bullet 9: Where a balance has been struck in taking decisions between competing alternatives is it clear how those decisions have been taken?*

14. No comment

*Bullet 10: What criteria were used to select allocated sites? Is it clearly set out how various alternatives measured up to the selection criteria?*

15. In terms of the Council's methodology for assessing the potential for sites, we can only comment on how Officers have approached Coed Darcy. This contact has been regular for a number of reasons and the Council does display a solid understanding of the site. The Council has comprehensive information on the proposals that we have made for development there.

16. With respect to other sites, selection has been driven by the quantum of housing proposed in the plan. We have had concerns with some of those sites (or the type of sites) that have been identified. It appears unlikely that they will be removed but the very high level of housing proposed does mean that sites could be staged or phased without detriment to wider plan strategy or overall provision.

*Bullet 11: What contingencies are there with regard to achieving the intended distribution of housing development if sites fail to come forward or to provide the anticipated number of units?*

17. The very large amount of development land allocated for new housing by the plan provides a contingency allowance way in excess of the headline levels claimed. No further contingency is required.

*Bullet 12: Should there be a policy to encourage self-build housing schemes?*

18. No comment

*Bullet 13: Are there sufficient housing allocations in the Valley Strategy Area?*

19. No comment

## Appendix 1 – Extract from Matter 2 Statement

*Bullet 15: What is the current position with regard to Coed Darcy Strategic Regeneration Area?*

1. Significant progress has been made at Coed Darcy. Outline planning permission (for a mixed use new community of 4000 homes) was granted in February 2008 and development of the first phase (of 300 homes) began in 2012. Very large amounts of land have been reclaimed and remediated, new infrastructure has been installed and the transformation of the site is now well underway.
2. Development of the first phase has progressed well and interest in the site is very strong.
3. By the time we reach the examination reserved matters for the first part of the second phase of residential development (and a small part of the local centre) should have been approved together with a development brief for the whole of the second phase (which extends to 500 homes and includes the first primary school). An application for the school should also be with the Council or will be made soon afterwards.
4. Improvement works to Junction 43, required as part of the package of highways works, are underway. Discussions are at an advanced stage to reconfigure some of the requirements of the section 106 agreement for so that development can commence more quickly on the southern part of the site. When that happens, Coed Darcy effectively (and commercially) becomes two schemes in terms of delivery.

*Bullet 16: The assumed rate of housing development per annum at Coed Darcy increases over the plan period. What evidence is there to support this rate of delivery? Is it realistic to expect an additional 250 units to be provided there?*

5. There are three main sources of information to support the rates of delivery proposed for Coed Darcy:
  - a) Evidence from the site – delivery achieved and proposals for the next five years
  - b) The examination and adoption of the Newport Local Development Plan
  - c) Submissions to the Cardiff Local Development Plan Examination
6. In terms of evidence from the site itself, it is clear that homes at Coed Darcy are attractive. The first phase has sold quickly with 100 sales or occupations achieved in a twelve month period. This is at the beginning of the development when the site is arguably at its least attractive, when there is lots of construction and remediation activity going on nearby and where there are few on site facilities available. It has also been achieved by a single developer producing houses in an uncertain period when the economy is recovering (and has clearly not yet recovered or restructured following the severe downturn).
7. The commercial objective is to secure between three and four housebuilders or outlets on site plus affordable housing providers and other niche developers (for example those delivering retirement or care provision). This predicts each outlet will achieve between 50 and 75 sales per year (which allows for some demand spreading – it would be appropriate to simply multiply phase 1 by three or four). However once development in the southern area commences, and the northern area begins to offer much more in looks and facilities the discount for spreading is likely to decrease (and the number of developers could increase).
8. Key milestones in the scheme, including physical and social infrastructure are also being actively progressed to support the new homes.
9. This clear logic has informed the amount of development that we have said Coed Darcy can deliver over the plan period. This sees about 150 homes built between April this year and March 2016, with 200 per year achieved in 2019/2020 – which coincides with the LDPs first

spike in performance. With the maturing state of the site as it moves from the pioneering stage and becomes a destination that is well known (and gets its own secondary school as well as primary schools), rates should rise again in the final five years of the plan.

10. On this basis we are confident that 2,500 homes can be delivered in the plan period. This figure features within the representations submitted to the LDP and reflects a proven appetite (or capacity) for the site as a place to live (with higher rates than anticipated for the first phase). It is also clear that the site can physically and environmentally support significant new residential development.
11. Experience of other development plan also supports the levels of growth proposed at Coed Darcy.
12. The examination into the (now adopted) Newport LDP considered delivery rates in the City's Eastern Expansion area (which includes the Glan Llyn new community on the former heavy end of the Llanwern Steelworks). The area's performance in terms of delivery was interrogated at length during the examination. This discussion allowed the Inspector to conclude that rates of 300 a year were appropriate for the entire expansion area which is comparable with Coed Darcy (once both northern and southern parts are underway). The Inspector also makes some helpful comments about development sequence (and elsewhere about the link between economic growth led planning and housing land supply). A section of the Inspector's report is attached as appendix A to this statement.
13. At Cardiff, very high levels of housebuilding are proposed in multiple locations (around the City on greenfield sites). The development industry there is supporting the delivery of these rates with builders completing statements of common ground with the Council which include trajectories. It is completely understood that Cardiff is a different market area and will generate high levels of interest, value and delivery. It is equally understood that there have been no large greenfield sites available around the city for a long time because there has been no plan. As a result, once permissions are granted very high growth is therefore very likely, very quickly.
14. The scale of what is proposed in Cardiff, and which has been agreed is very substantial with multiple strategic sites delivering sustained levels of growth over the whole plan period.
15. In this context, to expect this plan's one strategic site to deliver 2,500 homes (or just over 200 homes per year) is reasonable and realistic. It also reflects the wider ambitions of the plan – indeed it is difficult to support the very high level of growth proposed without accepting the rate of development proposed at Coed Darcy.

## Extract from Newport LDP Inspector's Report

### *Spatial Pattern of Development*

3.5 The Plan's regeneration focus and the resulting spatial distribution of development sites stems from the decline of traditional industrial activity in and around Newport, which has given rise to large areas of redundant land especially within the older urban area and at the former "heavy end" of the Llanwern steelworks site east of the city. The amount of development in the central area of Newport is a reflection of the on-going regeneration of the city centre, guided by the Newport Unlimited Central Area Master Plan (2011). The decline of traditional industries located in the surrounding urban area has resulted in a number of large sites in need of renewal; the Plan rightly maintains a focus on regenerating these sites and securing their beneficial re-use, including for new housing provision in locations with good accessibility to facilities and services, jobs and transport links. The closure of the heavy end of Llanwern Steelworks led to the identification of the Eastern Expansion Area (EEA) in the UDP, which is expected to deliver more than 5,000 dwellings when fully built out. The housing areas of Glan Llyn and Llanwern Village, which comprise the bulk of the EEA, are committed housing schemes, now carried forward in the LDP. Most of the other housing sites identified in the Plan are also brownfield sites with planning permission or under construction.

3.6 There is broad acceptance of the general development focus of the Plan on urban renewal and re-use of sustainably-located brownfield land. Emphasis on re-using such land in preference to greenfield sites, especially greenfield sites in less accessible locations, is plainly consistent with national planning policies. Whilst some submissions contend that there is an over-reliance on brownfield sites which have historically failed to deliver development, sites identified as questionable have been scrutinised at the examination. Where the balance of evidence indicates that such sites should not be relied on to help deliver the housing requirement, these are deleted and replaced by deliverable sites<sup>8</sup>.

3.7 Although arguments have been advanced that the Plan's spatial distribution of housing sites is too heavily focussed on the eastern side of Newport, the major strategic sites of Glan Llyn and Llanwern Village already have the benefit of planning permission. There will always be an element of uncertainty about future delivery rates on such sites. Nonetheless, the Council's expectation that these sites can, once fully on-stream, together deliver around 300 units per annum is supported by the expected future annual completion numbers agreed as part of the 2013 Joint Housing Land Availability Study (JHLAS). Taking this together with oral evidence about Glan Llyn at the examination I consider that the projected number of completions on these sites by the end of the plan period is credible and adequately supported by evidence.

3.8 Given that these two sites are relied on to deliver nearly a third of the total number of units over the Plan period, targeted monitoring of housing completions at Glan Llyn and Llanwern Village is necessary, since this will enable possible delivery issues in the EEA to be identified and underlying reasons examined. New indicators OB4 MT4 and OB4 MT5 in the monitoring framework, forming part of **MAC 12.1** and updated by **MAC 12.2** to reflect new evidence, give effect to this. In view of the scale of the EEA proposals and their significance to the Plan as a whole, **MAC 14.2** gives high priority to the intended updating of the 2007 Eastern Expansion Area Supplementary Planning Guidance.

3.9 The LDP identifies an appropriate spread of housing sites across the Plan area, including an adequate amount of housing in the north-western sector of the administrative area. Chief amongst the latter is the former Alcan site (Jubilee Park) at Rogerstone, expected to deliver some 930 homes within the Plan period. The overall spatial balance of housing land in the Plan is broadly consistent with the balance of employment land. Given also the urban regeneration focus of the Plan strategy, the Council's spatial and "brownfield first" approach to housing land identification is justified. I consider that the range and location of sites identified are sufficient to enable a full range of housing types to be provided. Although in many instances this would be as part of the mix on a larger development, there is nothing inherently wrong with this approach.