

# **PLANNING STATEMENT**

## **(Including Design and Access Statement)**

**In Support of Outline Planning Application for Proposed Residential Development of approximately 135 dwellings, vehicular access and infrastructure, to accompany Pre-Application Consultation**



**Land adjacent to Glanhafren Hall**

**Llanidloes Road, Newtown, Powys, SY16 4HZ**

**Our Ref: R092**

**August 2017**

## **Summary of the Application**

### **Proposal**

Outline Planning Application for residential development of approximately 135 no. dwellings, vehicular access and infrastructure.

### **Location**

Land adjacent to Glanhafren, Llanidloes Road, Newtown, Powys, SY16 4HZ

### **Date**

July 2017

### **Project**

R092

### **Client**

Mr Paolo Re  
Glanrhyd  
Llanidloes Road  
Newtown  
Powys  
SY16 4HZ

### **Local Planning Authority**

Powys County Council

### **Statement prepared by**

Hughes Architects  
29 Broad Street  
Newtown  
Powys  
SY16 2BQ

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## 1.0 INTRODUCTION

- 1.1 This Planning Statement accompanies a planning application submitted on behalf of Mr Paolo Re for **outline planning permission** for residential development, vehicular access and infrastructure on land adjacent to Glanhafren Hall, Llanidloes Road, Newtown, Powys SY16 4HZ.
- 1.2 This application is made in outline and will include a complementary suite of supporting documentation at the point at which it is submitted for planning approval.
- 1.3 The application site comprises a parcel of land which is currently used for grazing stock. It has always been in private ownership and there are no public rights of access to the land. The site currently sits outside the settlement boundary of Newtown within the Powys County Council Unitary Development Plan (UDP) OR Local Development Plan (LDP). However as we will discuss further in 'Planning History/Context', it was included in the Montgomeryshire Local Plan (Deposit Version 1995) with a strong presumption in favour of residential development.
- 1.4 The application is submitted in response to the current absence of a 5-year housing land supply in Powys and a need to deliver housing in the short to medium term, practically to meet affordable housing requirements.
- 1.5 The planning application comprises the following set of drawings

<b>Drawings title</b>	<b>Drawings No.</b>	<b>Prepared by</b>
Proposed Site Plan	R092.1.1.05B	Hughes Architects
Location Plan	R092.1.1.01	Hughes Architects

- 1.6 In addition, the application will be accompanied by the following supporting documents:

<b>Documents Title</b>	<b>Prepared by</b>
Topographical Survey	Invar Mapping
Preliminary Ecological Assessment	Turnstone Ecology Limited
Archaeological Evaluation	To be confirmed
Flood Consequences Report	Hafren Water (awaited)
Transport Statement	To be confirmed
Landscape and Visual Appraisal	To be confirmed
Arboricultural Report	To be confirmed

- 1.7 The purpose of this Planning Statement is to provide additional and complementary information to the planning submission.

## 2.0 SITE DESCRIPTION

### Location of the site and the context

- 2.1 The application site lies to the west of the settlement of the historic market town of Newtown.
- 2.2 Newtown is the largest settlement in Powys and on the strategically important transport corridor (the A489) from the West Midlands into Wales. As befitting its status as the largest settlement in Powys, Newtown plays a strategically important role in the Severn Valley area, providing key services and facilities to numerous settlements in a large rural hinterland. The services and facilities provided in Newtown include a hospital, a college of further education, 7 no. primary schools and 1 no. secondary school, significant employment opportunities, a wide retail offer and leisure facilities (including a sports centre). The settlement also benefits from a bus station and railway station which links the settlement to a wider area of Powys and beyond. Newtown is therefore the primary focus for housing and employment growth in Powys. In the latest census (2011) the town had a population of 11,357.

### Details of The Site

- 2.3 The application site comprises an agricultural field amounting to **8.7 hectares** (of which **5.37 hectares** are reasonably developable having regards to the following site constraints:

Roman road exclusion zone:	1.16 ha
Flood zone:	1.24 ha
10m exclusion zone from road	0.20 ha
Exclusion zone (listed building curtilage)	0.73 ha

The Site Constraints Plan is included with this statement at Appendix 12 and shows a part of the site to be affected by a flood exclusion zone and the presence of a Roman road running through the land.

- 2.4. The site lies to the west of the current residential settlement and immediately to the north of the A489 trunk road (from which it would be accessed), which runs from Welshpool through to Machynlleth and links with the A470 to Rhayader and A44 to Aberystwyth. It is bordered to the east by the line of the Mochdre Brook and to the west by the line of the River Severn. A recently planted hawthorn hedge forms the southern boundary with the A489, while a well managed mature hedgerow comprising a number of different species of plant forms the eastern boundary. Scattered trees, preceded by sheep fencing, form the northern border, located along the border of a railway embankment running west to east and linking Newtown with other stops along the Cambrian Line. A line of semi-mature cherry trees is located adjacent to the western field boundary preceded by a sheep fence.

- 2.5 The proposed development would be situated on land adjacent to and east of Glanhafren Hall (OS Eastings: 308289, OS Northings: 290414, OS Grid: SO082904), a complex of buildings that includes listed structures (Glanhafren Hall, Apple House Glanhafren and Glanhafren Hall gateway) and a non-designated heritage asset (a walled garden). On the opposite, southern edge of the A489 is located Glandulas Caravan Park and a small light industrial/commercial unit. The site is located within the line of the Newtown by-pass (currently under construction) which offers excellent opportunity for residential and employment development as a result of improved transportation links while providing a logical extension to the built environment of Newtown on its western fringe.
- 2.6 Completion of the by-pass will reduce the volume of traffic along the current A489 route and leading to its downgrading in the highways hierarchy. The by-pass will also provide a new delineation to the extent and limit of the Newtown settlement.
- 2.7 The A489's 60 mph speed limit approaching from has been reduced to 30 mph during the construction phase of the bypass. It is likely that, following completion of the bypass this section of road will lose its trunk road status and that a permanent speed limit will be introduced. There is a permanent limit of 30 mph approaching the roundabout which serves The Hafren/NPTC College and Mochdre Industrial Estate entering Newtown from a west/east direction..

### **Sustainability – Proximity of Local Facilities and Services**

- 2.8 The site lies within reasonable walking distance of facilities and services provided in the town, as illustrated within the Transport Statement supplied with this document. The centre of Newtown is located within 3 kilometres walking distance of the site whilst the Primary School is located within 1.6 kilometres and the High School 2.4 kilometres.
- 2.9 In terms of accessibility, the submitted Transport Statement illustrates that the site is accessible for cyclists and in terms of specific infrastructure, cycle routes local to Newtown and the development site are:
- The National Cycle Network (NCN) **Route 81** – Lon Cambria (Aberystwyth to Shrewsbury running West to East)
- 2.10 From the town centre, a number of bus services provide services to local towns and beyond. **Routes X75, T4, 71/81, X85 and 775** serve the town and provide connections to other regional centres. For example the X75 (linking Newtown with Rhayader, Llanidloes, Weshpool and Shrewsbury) and X85 services (to and from Machynlleth) run several times a day and stop at Coleg Powys located less than 1 kilometre (approximately 11 minutes walk) away. The town is also well served by local bus services. The submitted Transport Statement provides full details of the available bus services. Newtown Railway Station forms part of the

Cambrian Line linking stations from Aberystwyth to Birmingham. The railway station is located approximately 3 kilometres to the east of the proposed development site.

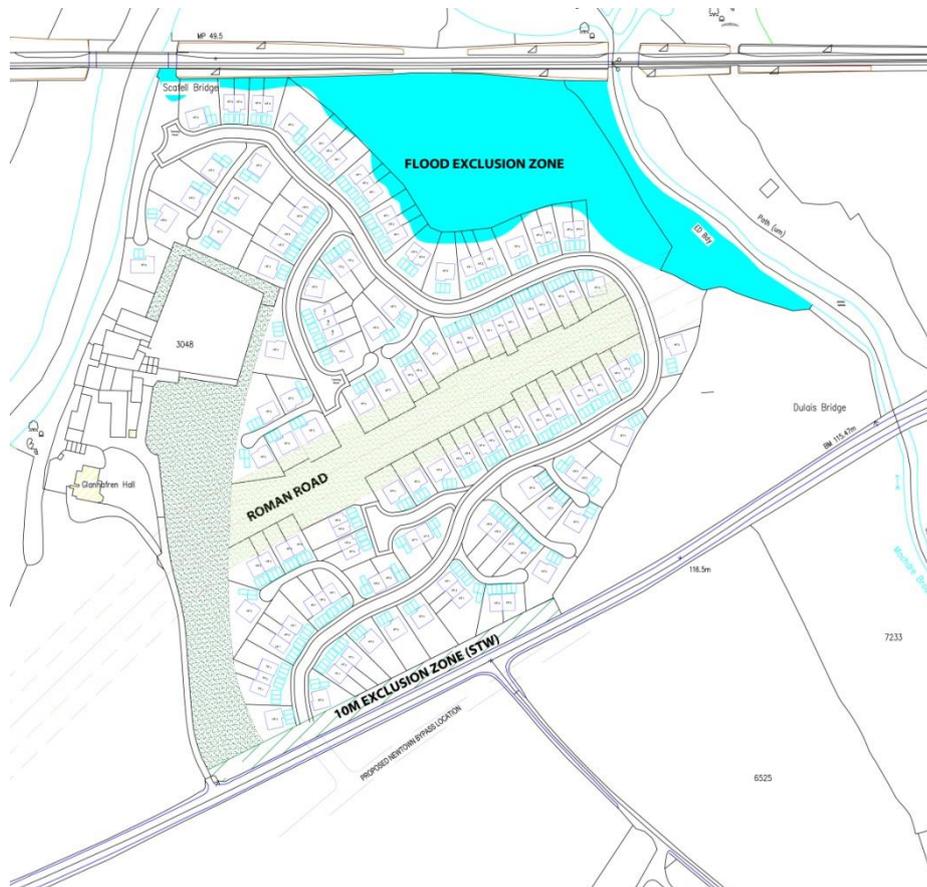
### **Planning History and Context**

- 2.11 The site has no recent planning history and is not zoned within the emerging Powys Local Development Plan. However it was included as part of the Newtown settlement and zoned for development in the Montgomeryshire Local Plan (Deposit Version) 1995.
- 2.12 The Montgomeryshire Local Plan was used for development control purposes in North Powys until the adoption of the Powys Unitary Development Plan (UDP) in 2010. The emphasis at this stage was on developing the South and West of Newtown. This emphasis changed to the North of the town upon adoption of the UDP since when very few sizeable land parcels have been developed due to the considerable infrastructure improvements required. Detailed analysis of other sites zoned for development in the emerging LDP and pur assessment of the likelihood of their being developed over a five year period is included in section 6 of this Statement.
- 2.13 By contrast we contend that the land adjacent to Glanhafren Hall is easily accessible from both the existing highway network and the new bypass and is deliverable within the next five years.
- 2.14 In relation to the walled garden at Glanhafren Hall (the non-designated heritage asset referred to in the introduction to this statement) a planning application for works to this structure, accompanied by a Design and Access Statement has been submitted and a decision is awaited.

### 3.0 APPLICATION PROPOSAL (DESIGN AND ACCESS)

#### Type of Application Proposal

- 3.1 The planning application is proposed to be made in 'outline' with only the means of access to the site considered at this stage. All other matters will be considered at 'reserved matters' stage. The application is supported by an *indicative* site layout and technical supporting documents which illustrate that the site is capable of accommodating approximately **135 dwellings** (representing a density of 25 dwellings per hectare) along with associated car parking and landscaping. In line with Powys County Council policy that 20% of new developments of 5 or more dwellings in the Severn Valley shall be affordable, it is envisaged that 28 such units are provided in reference to needs information provided by the Council.



Indicative site plan proposal

## **Proposed development**

- 3.2 The proposed development site represents a significant opportunity within the redefined boundary of Newtown for level access both to the site and to town centre facilities.
- 3.3 Although the current application is made in **outline** with all matters reserved other than access it is envisaged that the nature of the development will be comprised of a scale and type that will help address the demand and need for housing in our largest settlement and will consist of a density and using building materials both sympathetic to and in keeping with that of other residential developments within the town and having regard to other considerations – which include potential exposure of part of the site to risk of flooding; ecological and archaeological factors and the proximity of listed buildings

## **Highways and Access**

- 3.4 Access to the proposed development will be provided via a new access off the existing A489 and which will cater for all forms of pedestrian and vehicular traffic. Access to and from the development is likely to be greatly improved and much safer following completion of the Newton bypass and which is likely to see the imposition of new speed limits along the current section of the A489 that lies within the line of the bypass.
- 3.5 Car parking will be provided in accordance with current CSS Wales Parking Standards of 1 space per bedroom up to a maximum of 3 spaces per dwelling (and 1 space per 5 dwellings in respect of visitor parking)

## **Environmental Sustainability**

- 3.6 Although the detail of design will be determined under a reserved matters application it is proposed to make the most efficient use of natural resources while maintaining and enhancing the environment. A flood plain survey shows that while there is a nominal risk of flooding this risk can be mitigated through sensitive location and layout. This means that the proposed dwellings, access and infrastructure should not result in an increased risk of flooding to this site.
- 3.7 In terms of its aspect, the site will be designed so as to make maximum use of natural sunlight and therefore take advantage of the installation of solar heating and lighting installations. The **indicative** site layout, shown here, illustrates a mixed development of terrace, semi-detached and detached homes that make best use of land while providing sufficient private amenity space for residents. Sustainable materials will be used in the construction process in so far as it is practical to do so.

## Community Safety

3.8 In addressing the matter of community safety we will seek to:

- Enable attractive, safe public spaces
- Provide security through location and natural surveillance

The development will be designed to ensure that, wherever possible, properties overlook each other while also respecting the privacy of residents and their right to quiet enjoyment. The layout of the scheme ensures that there is a single means of vehicular access and egress to and from the site and which can also be more easily observed by residents and from the highway. Moreover the proposed development will emphasise to motorists leaving that the bypass that they are entering a settlement area and are more likely to drive responsibly as a result.

We will:

- Design a site that has a sense of community and place
- Create a clear route to and from the development
- Provide a clear layout sympathetic to security through natural surveillance
- Allow for individual and secure garden areas for each property, reducing the points of entry
- Ensure that individual parking areas are overlooked by the properties and those neighbouring them
- Ensure that the principles of Secured by Design have been considered within the design process

3.9 In conclusion, we will propose solutions which seek to:

- Promote innovative and high quality design while at the same time sustaining and enhancing local character and promoting a successful relationship between open and private space.
- Ensure that buildings are environmentally sustainable in terms of their thermal efficiency, ventilation and access to natural daylight.
- Provide safe and clear connections with amenities and which aim to integrate the development with the existing footpath, cycle and road network.
- Address the issues of community safety in relation to aspect and design.

3.10 In doing so we have sought to address the requirements of the following key policies:

- POLICY GP1 – DEVELOPMENT CONTROL which provides that development proposals will only be permitted if (where appropriate) they complement and if possible enhance the character of the surrounding area; minimise potential for crime; do not unacceptably affect the amenities enjoyed by occupants; provide for adequate utility services without unacceptable adverse effects on the surrounding environment; safeguard (and where possible enhance) important trees,

hedgerows, stone walls, open spaces and other local features that contribute safeguard to the quality and character of the local environment, and be landscaped using appropriate indigenous species and materials..

- POLICY GP3 – DESIGN AND ENERGY CONSERVATION which provides that all proposals for development should make a positive contribution to their local environment and community through imaginative and good quality design, layout, materials and landscaping in accordance with the policies of the UDP.
- POLICY GP4 – HIGHWAYS AND PARKING REQUIREMENTS which states that permission of development proposals will be dependent on adequate provision for highways access (including visibility, turning, passing, dropped kerbs, circulation and servicing space) and parking in compliance with the county council's guidelines. The standard of parking provision to be agreed with the local planning authority to be determined by a range of factors including accessibility to services by walking, cycling and public transport, environmental considerations and any transport assessments required.
- POLICY DC1 - ACCESS BY DISABLED PERSONS which provides that applications for development will be permitted where suitable access is made to/within buildings or amenities and where adequate facilities are provided for people with disabilities.



- 4.3 The **Preliminary Ecological Assessment**, meanwhile, was undertaken earlier this year comprising of a Phase 1 Habitat Survey, a Protected Fauna Survey and Habitat Suitability Assessment and consisting of a mixture of desk and field study. The work shows the proposed development to be situated within 2km of three designated Sites of Special Scientific Interest. In terms of the site and adjoining land, the survey found that this contains habitat suitable for sustaining some species of protected species. The field, upon which the development is proposed, however, is comprised of short-sward improved grassland. This is species poor and dominated by common species grass.
- 4.4 The study concludes that works will mainly affect ecologically poor improved grassland and notes that the majority of hedgerows and all trees capable of attracting and maintaining species diversity are to be retained. The site is not designated for its wildlife interest and no legally protected plant species were identified or are likely to be found in the habitats encountered.
- 4.5 The report further concludes that no designated sites will be directly affected by the proposal and that it is unlikely that there will be any major negative indirect impacts as a result. Proposed hedgerow and tree planting within and around the development site along with suitable roosting features will ultimately improve the site for foraging, commuting and roosting.
- 4.6 In order to protect habitats and maintain and enhance biodiversity of the site as a result of removal of part of the southern hedge to form access and in order to prevent and offset unmitigated drainage, run-off and disturbance, a number of measures and safe working methods are recommended and which will be fully adhered to.

## 5.0 PLANNING POLICY FRAMEWORK

- 5.1 The planning policy framework for the determination of this application is provided by national planning guidance, together with the statutory 'development plan'.
- 5.2 National planning policy is contained within the ninth edition of Planning Policy Wales (PPW), published in November 2016. PPW is supported by 21 topic-based Technical Advice Notes (TANs), which are also relevant.
- 5.3 The statutory 'development plan' for this site is currently provided by Powys County Council's Unitary Development Plan (UDP) which was adopted on 1st March 2010. ***The UDP expired in 2016. The successor Local Development Plan (LDP) 2011-2026 is yet to be adopted.***

### Planning Policy Wales (PPW)

- 5.4 PPW is the principal planning policy document of Welsh Government that needs to be taken into account in the preparation of development plans and in the determination of planning applications and appeals. The main thrust of PPW is to promote sustainable development by ensuring that the planning system provides for an adequate and continuous supply of land available and suitable for development. It dictates that available land must meet society's needs in a way that is consistent with overall sustainability principles.

### Technical Advice Notes

- 5.5 PPW is supported by 21 Technical Advice Notes (TANs) which provide more detailed guidance on a variety of issues. In respect of this application, the following TANs are considered to be of relevance.

*Technical Advice Note 1: Joint Housing Land Availability Studies (January 2015)*

*Technical Advice Note 12: Design*

*Technical Advice Note 18: Transport*

- 5.6 TAN 1 in particular is relevant to this application as it reiterates the requirement for each Local Planning Authority (LPA) to maintain a 5-year housing land supply and must produce a Joint Housing Land Availability Study (JHLAS) to demonstrate this. It requires that housing land supply be treated as a material consideration in determining planning applications for housing. ***Where the current study shows a land supply below the 5-year requirement TAN1 states that the need to increase supply should be given considerable weight when dealing with planning applications provided that the development would otherwise comply with development plan and national planning policies.***

## County Development Plan Policy – Unitary Development Plan (Expired) 2001-16

- 5.7 The statutory 'development plan' for this site is provided by Powys County Council's ***Unitary Development Plan (UDP)*** which was adopted on 1<sup>st</sup> March 2010. ***However, the UDP has expired and is due to be replaced by the Local Development Plan (LDP) (see below).***
- 5.8 Within the UDP proposals map the application site lies wholly within the settlement boundary for Newtown. An extract of the UDP proposals map is included within Appendix 2.
- 5.9 Part One of the UDP sets out a Sustainable Growth Strategy that seeks to concentrate the majority of housing, economic and retail development in the larger market towns, known as area centres and the largest villages, referred to as 'key settlements and 'large villages' ***The town of Newtown is identified as an Area Centre', and therefore sits at the top of the settlement hierarchy and is therefore considered to be a sustainable settlement capable of supporting necessary housing and employment growth.***
- 5.10 Part 2 of the UDP sets out general development control and design policies that apply to all planning applications. The following list of UDP general policies are considered to be of most relevance:
- 5.11 The most relevant UDP policies in respect of this application are summarized as follows:
- Policy SP1 seeks to ensure that development proposals contribute towards the social, community and cultural sustainability of local communities.
  - Policy SP3 seeks to ensure that development proposals have due regard to natural, historic and built heritage.
  - Policy SP5 seeks to allocate sufficient land for housing development across the County.
  - Policy GP1 is a general development control policy applicable to all applications for development.
  - Policy GP4 of the UDP concerns highway and parking requirements.
  - Policy ENV2 seeks to ensure the development proposals have due regard for the landscape.
  - Policy ENV3 seeks to protect safeguarded biodiversity and natural habitats.
  - Policy HP3 reiterates the need for the Council to maintain a 5-year supply of housing land.
  - Policy HP4 sets out policy regarding settlement development boundaries and the capacities of settlement to accommodate development.
  - Policy HP5 referred to with the above policy concerns the development of allocated sites and other sites within settlement boundaries.
  - Policy T2 concerns the development of traffic management schemes

5.12 Other relevant UDP policies include:

- SP6 - Development and Transport
- GP2 - Planning Obligations
- ENV1 - Agricultural Land
- ENV9 - Woodland Planting
- HP1 - Shire Housing Allocations
- HP10 - Affordability Criteria
- T3 - Transport Assessments and Travel Plans
- T4 - Transport User Hierarchy
- T6 - Walking and Cycling
- T8 - Access by Disabled Persons
- DC1 - Access by Disabled Persons

5.13 The following Supplementary Planning Guidance (SPG) documents are considered to be relevant in the consideration of this application:

- Affordable Housing SPG - September 2010 and updated July 2011
- Residential Design Guide — October 2004
- CSS Wales Parking Standards

5.14 The Council, in its role as the Highways Authority, has adopted the CSS Wales Parking Standards which requires parking to be provided at a rate of 1 no. parking spaces per bedroom up to a maximum of 3 spaces per dwellings.

**County Development Plan Policy - Local Development Plan (LDP)  
(Unadopted) 2011-26**

***(Note: The LDP has reached 'Deposit' stage and in January 2016 was submitted to the Welsh Government for examination. Consultation on 'Further Focused Changes' ended in November 2016 and hearings were undertaken in Spring 2017. A further round of public consultation is being arranged for September 2017 to consider Matters Arising Changes as a result of these earlier hearings. It is anticipated that the LDP will not now be adopted before April 2018. It has no formal status until such time as it is adopted).***

5.15 Appendix 1 of the LDP provides a schedule of Powys Settlements and Allocated Housing Sites (5 or more dwellings). The relevant extract relating to Newtown is provided with this Statement.

## **Evaluation of site in respect of the emerging LDP**

- 5.16 The site was proposed as a candidate site for the Powys LDP but was rejected for inclusion on the basis of the LPA's contention that there was sufficient land allocated for residential and employment purposes; that the site was physically and visually detached from the rest of the settlement; was deemed highly visible and would constitute undesirable encroachment into the countryside.
- 5.17 This latter point was contested at the inquiry stage although the outcome of this representation has yet to be determined. In addition and as has already been mentioned briefly, it can be argued that the construction of the new bypass serves to redefine the settlement boundary for Newtown while other proposals to extend the settlement are known to be before the Local Planning Authority and which if successful may form a precedent for further development.
- 5.18 In the following sections of this statement we will also argue that a residential development on this site will not only help meet housing need (as evidenced through the Local Housing Market Assessment and Common Housing Register) but has a much more realistic chance of being delivered within a five-year period than have many of the schemes already identified for development in the LDP.

## 6.0 HOUSING LAND SUPPLY & HOUSING NEED

### Housing Land Supply

- 6.1 As noted earlier, Welsh Government, through PPW TAN 1 requires that all Local Planning Authorities must maintain a 5 year supply of housing land. **However, the most recent Joint Housing Land Availability Study (JHLAS) (April 2016) shows that Powys has only 2.2 years' worth of deliverable housing land. Furthermore, given that the UDP is time expired in accordance with TAN 1, the Council is now deemed to have 0-year supply.** An extract of the JHLAS is provided at Appendix 5 of this Statement.
- 6.2 The data on allocated sites and completions paints a confusing picture with uncertain correlation between UDP, JHLAS and LDP information. We have therefore provided a best estimate of the number of delivered units based on the original UDP allocation of 753 dwellings. In Newtown itself the UDP identified allocated residential development sites up to 753 no. dwellings as being deliverable up to June 30 2016. This is illustrated in Appendix 2 to this statement while the table on page 25 shows how the sites identified in the UDP correlate to the 2016 JHLAS at Appendix 5.
- 6.3 **The table overleaf illustrates that in Newtown itself only 364 dwellings were delivered out of the 753 that were allocated in the UDP representing a delivery rate of 48%.** To put this in simple terms the LDP forecast at least 50.2 dwellings a year being constructed in Newtown over the plan period. In fact it only delivered 24.3 dwellings per year over the plan period. The table illustrates this in more detail on a site by site specific basis.
- 6.4 The JHLAS included at Appendix 5 lists all the potential development sites within Newtown that are either allocated or benefit from planning permissions. **It is our opinion, based on our considerable local knowledge of these sites, that out of a potential 10 schemes only 5 will be delivered.**
- 6.5 In order for the LDP to be adopted, the LPA will need to demonstrate there is a 5-year land supply upon adoption. Despite the fact that the UDP has delivered just 364 of the allocated 753 dwellings, the emerging LDP allocates land in Newtown with a capacity for just 640 dwellings plus 1 site of unspecified number. **The number proposed is considered to be grossly insufficient for a settlement the size of Newtown which is defined as an 'Area Settlement' at the top of the settlement hierarchy and over a plan period which extends to 2026.**

<b>Adaption of JHLAS (April 2016)</b>					
<b>Site Ref. And Name</b>	<b>Completed Total</b>	<b>Capacity</b>	<b>Remaining</b>	<b>Area (Ha)</b>	
M182 HA1 – Land at Pengwern	46	46	0		
M178 HA2 – OS4555 Bryn Lane M178 HA3 – OS6347 Bryn Lane M178 HA4 – Land the south side of Bryn Lane	60	94	34	0.13	
M178 HA5 – OS 5332 Sycamore Drive	41	41	0		
M178 HA6 – Hendidley, Milford Road	56	72	16	0.74	
M179 HA7 – Llys lfor	2	5	3	0.07	
M178 HA8 – Vernon House, Llanllwchaiarn	6	6	0		
M178 HA9 – Central Dairies	52	52	0		
M180 HA10 – Black Hall, Garth Owen	0	25	25	1.36	
M180 HA11 – Severn Heights, Brimmon Close	87	110	23	1.11	
M181 HA12 – Rock Farm, Llanllwchaiarn	108	211	103	4.28	
M181 HA13 – South of Fronlas Wood, Llanllwchaiarn	0	195	195	6.6	
M181 HA14 – OS6268 South of Rock Farm	0	105	105	4	
M182 HA15 – Adjacent to Glandwr, Vaynor	18	18	0		
M179 HA16 – Ffordd	33	33	0		

Croesawdy				
M180 HA17 – Rear of the Pentecostal Church	0	26	26	
M179 HA18 – Land at 12. Lower Canal Road	7	7	0	
M179 HA19 – 1-3 Market Street	8	8	0	
<b>TOTALS</b>	<b>524</b>	<b>1054</b>	<b>530</b>	<b>18.29</b>

- 6.7 Hughes Architects not only has serious concerns over the lack of housing allocations within the town in the emerging LDP, but serious concerns are also raised over the deliverability of many of the sites which have been allocated.
- 6.8 In relation to the sites included within the UDP, those sites included within the LDP and those sites within the JHLAS the housing picture in relation to Newtown is muddled at best. We refer to the adapted JHLAS table in which there are certain sites that appear within this study but do not appear within the Local Development Plan.
- 6.9 The approach to zoning of land suitable for housing in Newtown is confusing. The supporting documentation to the consideration of candidate sites includes language which is contradictory and does not give us any confidence that the best land has come forward for development within Newtown.
- 6.10 We list below those sites that are included within the Local Development Plan as being suitable for housing together within commentary extracted from the LPAs suite of supporting documents to justify the inclusion of those parcels of land within the LDP as well as our opinion in relation to the likelihood of those sites coming forward during the planned period based on anecdotal, historical and local intelligence. These sites need to be cross referenced in relation to our annotated plan of the town at Appendix 8. We have numbered the land parcels ourselves as to include MLP, UDP as LDP numbers will be confusing.

**Site No. 1: Land at Severn Heights (Brimmon Close), Newtown (MLP Committed Residential Site, UDP M180 HA11, LDP P48 HC4)**

This site benefits from planning approval for residential development and formation of vehicular access dated 20/06/2006 and has reference M/2003/0511 and has been partially completed for 42 no dwellings. There are 23 no. dwellings remaining to be completed on this site and this benefits from approval P/2008/1620. The numbers of dwellings completed on this site vary in reality as compared to the capacity as denoted in the JHLAS. Planning approval has been secured for 65 no. dwellings across the entire site. Within the LDP it is noted that capacity for the site is 78 and within the JLAS the completed total is depicted as 87. This leaves a difference of 22 houses which distorts the housing total within the Joint Land Availability Schedule. In addition it has been noted that the 23 no. dwellings that are still to be completed are of a design that the current developer anticipates changing, therefore the density of the housing is likely to be less than that currently approved. We are therefore of the opinion that this site will deliver in the region of 60 no. dwellings in total representing a considerable difference between that included in the JHLAS.

**Site No. 2: Part enclosure 0042/1463/1658/2053/2864, Rock Farm, Llanllwchaiarn (MLP Allocated Residential Site, UDP M181 HA12 and LDP P45 HC5)**

This site is locally known as Rock Farm and has taken some time to complete. This is an extremely challenging site in terms of its topography and one would argue that the easiest part of the site has already been developed. Several companies have been

involved with the building out of this site and it is interesting to note that 103 dwellings are still to be completed on what is a very economically disadvantageous site to develop. This is evident by the number of builders that have failed to complete the development. It is noted that this site is currently being marketed for disposal and has been for some 8 years now with no potential purchaser. It is our opinion that this site will not be built out during the LDP plan period and we anticipate it will not deliver any houses. Bearing in mind the remaining number of dwellings on this site of 103 this will seriously reduce the delivery target of houses in Newtown.

**Site No. 3: South of Heol Treowen/ Great Brimmon (MLP Unallocated Site, UDP Unallocated Site, LDP P48 HC7 and P48 HA3)**

This steeply sloping site was not included in 2 previous development plans for obvious reasons. It is topographically challenging to build out and is traversed by high power gas mains which render a lot of the site as undevelopable. The site benefits from outline approval M/2003/1354 for an unspecified number of dwellings. Further outline planning permission was granted in 2011 against reference no P/2009/0942 for a Section 73 application to vary condition no.2 to allow an extension of time for the submission of reserved matters for this particular site. This was granted 27/05/2011 and it is not clear as to whether a reserved matters application has indeed been submitted since that time. It is therefore curious to note that this is a committed residential site given that there is no evidence of commencement and even if this has been done this would have been unauthorised given that there is no reserved matters application having been made.

It is our understanding that this site has been marketed for some 8 years now and it has been shown to be particularly unviable as a consequence of the considerable number of Section 106 obligations appended which included affordable housing, education contribution of over £100,000, play areas, public open space, highways improvements including extension of speed restrictions in the area.

Given that the above site benefitted from planning permission which has now expired and that it has been marketed for half a generation now we are of the opinion that it is undeliverable over the plan period despite having been supported by the Local Authority. Parcel P48 HA3 sits astride P48 HC7 and does not even benefit from the same planning permission. With all of the above in mind we are of the opinion that this site is likely to deliver 0 houses over the planned period despite it being forecast as delivering 152 by 2020.

**Site No. 4: Milford Park adjacent Hendidley, Milford Road, Newtown (MLP Allocated Residential site, UDP M178 HA6 and LDP P48 HA2)**

Like site no.2 above this particular land has been work in progress for nearly 20 years now. Similarly to site no.2 this land is particularly sloping and the easiest parts of the site have now been built out. According to the JHLAS the site has a capacity of 16 no. further dwellings however recent planning applications such as P/2012/1218 occupy several plots where the older applications included 3 no. plots on the same.

These steep sloping sites in Newtown for considerable numbers of dwellings have been proven to be difficult if not impossible to complete. This has been borne out by historical and commercial evidence. We are therefore of the opinion that rather than 16 no. dwellings to finish off this development we would surmise that this is more than likely to be 3.

**Site No. 5: OS6268 South of Rock Farm (LDP Allocated Residential Site, UDP M181 HA14, LDP Unallocated)**

In previous development plans this land parcel (and site no.6 below) were deemed to be the area in which Newtown could expand as a settlement. This particular site used to benefit from planning approval in outline M/2004/0170 and this was granted approval 20/05/2008. This has now expired.

A Section 106 obligation was appended to this particular approval and rendered it so unviable that despite many years of marketing no developers came forward to build this site out. This site was promoted as part of the Candidate Site Register and had reference 135. The Local Authority noted that this land could not be supported because "the site is at some distance from the settlement's centre and the majority of its services and facilities".

The delivery of this site was predicated on the understanding that considerable highways improvements needed to be carried out prior to development. At that time in 2008 this is quantified as being £1.8m. This was at the height of the housing boom and one would conclude that if this site was not delivered during one of the most lucrative development periods then it certainly is not deliverable now. There have been continued highways objections to developments in this area for any number of dwellings so we see this site as being totally unviable during the plan period. The capacity total within the JHLAS is 105 no. dwellings and this leaves a serious dent in this particular schedule.

**Site No. 6: South of Fronlas Wood (MLP Allocated Residential Site, UDP M181 HA13, LDP Unallocated)**

This site was included as part of expired approval M/2004/0170 described under site no.5. With a capacity of 195 no. dwellings it was supported at Candidate Site Register stage (CSR 624). The site has all of the technical obstacles that site no. 5 has and we are confident that it will not deliver any dwellings over the plan period.

**Site No. 7: Black Hall, Garth Owen (MLP Unallocated, UDP M180 HA10, LDP Unallocated White land)**

This is an infill residential site in close proximity to the position of the Newtown bypass. Despite considerable local opposition to its development this was granted outline planning approval with all matters reserved on 12/01/2017 for a non specific number of dwellings. An illustrative site plan indicates a potential development on 25

no. dwellings. This is one of the most viable schemes for delivery of housing within Newtown.

**Site No. 8: Bryn Lane (MLP Allocated Residential Site, UDP M178 HA2, HA3, HA4 and LDP P48 HC2)**

A site in the north of the town which has been completed in two phases to date. Planning has been granted for all 94 no. dwellings and phase 3 is currently set to deliver 34 no. dwellings. It is highly likely that this site will be completed within the plan period.

**Site No. 9: Timber Wharf, Lower Canal Road. (MLP Unallocated, UDP Unallocated, LDP Unallocated)**

The JHLAS speculated that this site has 37 no dwellings that could be accommodated within this site. A parcel of land adjacent to the River Severn, it is within the flood plain of this major watercourse. This renders this site (which is partially contaminated) as being particularly difficult to develop. However, in March 2017 conditional consent for a full planning application was granted for the erection of 30 no. affordable dwellings including 18 no. flats and 12 no. terraced houses. This is 7 no. fewer than were included within the JHLAS. The site is in the process of being developed with ground works having commenced and with a list of 35 conditions to satisfy. While it will provide much needed affordable housing the development will do nothing to assuage the demand for open market housing in the area.

**Site No. 10: Wesley Place, Newtown (MLP, UDP and LDP all Unallocated)**

This is a completed development site for 6.no flats which was a refurbishment of an existing building.

**Site No. 11: Back lane, Newtown (MLP, UDP and LDP all Unallocated)**

This is a completed development site for 6. no. flats which was a refurbishment of an existing building.

**Site No. 12: Land north east of Cefnaire Coppice and north of Heol Treowen, Newtown (MLP)**

This is an important site as it bears comparison with the site which is the focus of this particular application. Designated as an open amenity space within the Montgomeryshire Local Plan it was granted approval for residential development via the vehicle of approval M/2003/0709 for 10 no. bungalows and 16 no. flats. It is not apparent as to whether this is an implemented approval but it is designated as a committed site having reference P48 HC6. The application seems to have lapsed.

A committed and extant site does not necessary lead to housing delivery over the plan period and we are of the opinion that this site will not be developed out during that same period.

**Site No. 13: Severnside Yard, Commercial Street, Newtown (MLP Unallocated, UDP Unallocated and LDP P48 HA1)**

This is a completed development site contributing 48 no. flats for older people so does not contribute to the wider community in terms of delivery of much needed open market housing.

- 6.9 ***Based on the above analysis and having regard to our adaptation of the JHLAS we consider it very unlikely that 640 no. of dwellings can be delivered over the plan period. In contrast the application which is supported by this planning statement is clearly deliverable and will therefore provide much needed housing.***

**Housing Need**

- 6.10 In terms of housing need and specifically affordable housing, Powys' Local Housing Market Assessment Update 2014 (LHMA) identifies a need for 765 affordable dwellings over the first 5 years of the LDP period which equates to 153 dwellings per year. The LHMA identifies that the **Newtown and Llanidloes area have an annual affordable need of 23 social rented and 7 intermediate dwellings per year in order to keep up with demand.**
- 6.11 The current Powys Common Housing Register identifies the following households that are in need of houses in Newtown.

**Data from Powys Common Housing Register – Newtown  
(Source: Powys County Council, March 2017)**

<b>Household Type</b>	<b>Number</b>
Single Persons	198
Single Person with Dependent Children	68
Couple with Dependent Children	70
Couples or Other	65
<b>Total Households in Housing Need</b>	<b>401</b>

6.12 There are therefore 401 households with specific need for a house within the town. Even allowing for conservative estimate of 2 persons per household this would mean that there over 800 persons in housing need, which represents over 7% of the population of the town (based on 2011 census).

6.13 These households have expressed a need for the following types of property (*please note that some households may be considered for more than one size or type of property hence the sub-totals below do not accord with the number of households on the register*)

<b>Property Type</b>	<b>Household Type</b>	<b>Number</b>
House	Single	29
	Single with Dependent Children	66
	Couple with Dependent Children	67
	Couple/Other	27
	<b>Sub-total</b>	<b>189</b>
Flat/Maisonette	Single	171
	Single with Dependent Children	14
	Couple with Dependent Children	9
	Couple/Other	30
	<b>Sub-total</b>	<b>224</b>
Bungalow	Single	198
	Single with Dependent Children	1
	Couple with Dependent Children	6
	Couple with Dependent Children	30
	<b>Sub-total</b>	<b>103</b>

6.14 With the LDP proposing very few deliverable housing sites in the short to medium term, the need for both market and affordable housing both across the County but more specifically within Newtown is simply not being addressed and the unmet need will simply worsen unless deliverable sites are brought forward as a matter of urgency.

## 7.0 EVALUATION AND CONCLUSION

- 7.1 This planning statement accompanies an **outline planning application** for a proposed residential development with a potential to provide **135 no. dwellings**, vehicular access and infrastructure on land adjacent to Glanhafren Hall, Llanidloes Road, Newtown, Powys.
- 7.2 This site which lies outside of the settlement boundary of the LDP works well within a newly created delineation of the Newtown settlement boundary as a result of construction of the Newtown by-pass. We are of the opinion that the site is an appropriate location for housing development given that it is a logical extension to the settlement pattern.
- 7.3 In terms of the principle of development, the application must be determined in accordance with the development plan, unless material considerations indicate otherwise. ***In this case, there are significant material considerations which weigh heavily in favour of the grant of planning permission and these are summarised as follows:***

- ***The Council only has 2.2 years of housing land supply and PPW TAN1 states that the need to increase housing land supply should be given 'considerable' weight in the determination of planning application, provided that all other material considerations are adequately satisfied.***
- ***Upon expiry of the UDP on 30<sup>th</sup> June 2016, the Council now has no housing land supply.***
- ***The UDP has failed to deliver any significant housing development over the plan period leading to a demonstrable under supply of housing. This is forcing up the cost of housing and pricing young families out of the market.***
- ***The application proposes 20% affordable housing in an area with a significant unmet need and demand for affordable housing.***
- ***The LPA has failed to address the past shortfall in housing delivery in the emerging LDP as it has failed to identify sufficient housing land to serve the needs of the 'Area Centre' and many of the sites that have been identified are subject to serious concerns regarding their deliverability.***
- ***Based upon a review of the latest JHLAS and a review of the UDP sites, it is feasible that few new houses will be constructed in the town over the next 5 years.***

- ***The application site is deliverable as it is not subject to any insurmountable constraints and is available for development immediately upon the grant of any subsequent reserved matters application.***

7.4 In conclusion we contend that the application:

- ***Is deliverable in terms of providing much-needed housing to the largest key settlement area of Powys.***
- ***Makes best use of land and is sustainable.***
- ***Reflects new opportunities for development provided by the construction of the Newtown bypass and a revised delineation of the settlement boundary.***
- ***Will not impact negatively on the residential amenity of surrounding properties.***
- ***Will enhance ecological diversity as a result of additional landscaping, screening and facilities for attracting wildlife.***
- ***Will not adversely affect highway capacity or safety due to a major volume of traffic being diverted away from the site by the new bypass; the introduction of a new speed limit as a result of de-trunking and adherence to any recommendations arising from the outstanding transport survey.***
- ***Adequately addresses any other material considerations such as foul and surface water drainage, flooding, landscaping and archaeological matters.***

7.5 The LPA is therefore requested to grant consent for the development proposed.

**Disclaimer**

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