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Dear Mr Maher

## HEARING SESSION 2 – MA2.3 RESPONSE FROM BLAENAU GWENT COUNTY BOROUGH COUNCIL

Following our attendance at the Local Development Plan examination we welcome the opportunity to continue our involvement in the process and as such please accept the following comments in response to the matters arising from Hearing Session 2 – Housing Numbers.

Evidence submitted by the council in response to MA2.3 provides examples of housing density achieved on completed sites within Blaenau Gwent. We discussed at Hearing Session 2 on 26<sup>th</sup> June the importance of a realistic housing density assumption to inform the council's view on delivery from the identified sites.

It is crucial that the land allocations within the adopted Development Plan provide the identified number of homes to meet need and enable local growth, and for this reason the density applied to assume the number of dwellings which will be contributed from each site should be realistic and achievable.

Whilst we appreciate the council should be ambitious on their delivery, there are sensitivities within the local area (e.g. landscape) that could mean a lower density of development on a particular site is more appropriate.

It is important the housing densities which inform the council's assessment of potential delivery from the identified sites is realistic and will secure the target number of dwellings.

### Deposit Local Development Plan (document SD01)

The LDP allocates land for the construction of 1,625 dwellings above those which already have planning permission (1,707). The number of units on these sites has been predicted using an average density of 35

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dwellings per hectare (document SD01 paragraph 8.28). The LDP does note these figures are indicative and that higher or lower densities may be acceptable *'where the proposed development addresses other policy considerations including design and sustainability (Policy DM1)'*.

Policy DM2 of the LDP (document SD01) states that *'development proposals will be permitted provided:*

*a) They are appropriate to the local context in terms of type, form, scale, mix, and density...'*

Text supporting this policy states that *'all new developments must enhance and respect their surroundings and contribute towards the local identity. Developments must be of an appropriate type, form, scale, mix, and density for their location as the Council is committed to raising the standard of design on all new development'* (document SD01 paragraph 7.18).

If assumptions made by the council in terms of density do not allow for the identified sites to appropriately respect the local surroundings which may determine a lower density is more appropriate, the assumptions made will assume allowance for development which would be contrary to this policy.

We discussed at the hearing sessions the need for a range of housing to provide for local need, including low cost/smaller dwellings which would provide for smaller families as well as aspirational dwellings to address the out-migration of local residents to other areas surrounding the Borough. Although the council suggests the development density applied is indicative and allow for higher or lower densities dependent on design policy, it should generate a realistic figure. Developments of aspirational homes will naturally deliver lower densities and this should be accounted for in the council assumptions.

In the current market development is difficult and developers are less likely to build the flats and apartments which would achieve the higher densities to allow the balance of sites within the council's assumption to provide a lower density.

### Assumed Density

The Council have recognised that there are limited brownfield sites available and that as a result, land for housing development should be found elsewhere. Policy SP7 of the LDP (document SD01) gives preference to brownfield land and development at higher densities on sites located close to transport corridors or town centres. However, it is evident from the identified allocations that further brownfield housing sites are limited.

The LDP (document SD01 paragraph 6.6) identifies only two key brownfield sites within the principal hub of Ebbw Vale capable of accommodating *'significant new development to help regenerate the area'*; the former Corus Site known as 'The Works' which has outline planning permission for mixed use development including housing, and the Ebbw Vale Northern Corridor site is allocated for mixed-use including housing, employment and leisure.

The spreadsheet attached provides the density achieved on the committed housing sites which contribute about half of the allocations. The range clearly demonstrates that the council's assumed density of 35 dwellings per hectare (dph) to be achieved from allocated sites is ambitious.

The average development density of all committed sites is 33 dph. Our view is that this density does not accurately represent the potential housing numbers which will be achieved, and does not represent a precedent that will be sustainable going forward.

The average density achieved on the committed sites is weighted heavily by the particularly high densities achieved on developments within Tredegar – the Former LCR Factory, Charles Street (56 dph), Former LCR Factory, opposite Tredegar Comprehensive School (75 dph) and The Goldmine, Sirhowy (94 dph).

The Charles Street development provides 14 units (application ref. C/2005/0075), the former LCR Factory site 47 affordable units and the Goldmine development 16 flats in one 3-storey and one 2-storey block (application ref. C/2007/0613).

The high densities achieved on these permitted schemes are explained by the individual developments. Sites which provide either 100% affordable housing or flats, are likely to be considered much less attractive in the current market and it is unlikely that schemes similar to either of these would be considered viable by a developer in the current economic climate.

These examples have redeveloped brownfield sites of former employment land which there are limited other examples available to replicate.

The council should not rely on similar high densities being achieved elsewhere.

#### Assumed Density – Distribution of Dwellings

The spreadsheet attached splits the committed sites into the delivery regions – Ebbw Vale, Tredegar, Upper Ebbw Fach and Lower Ebbw Fach to illustrate the characteristics of each area and the precedent set in each of housing density likely to be achieved.

52% of the housing target within the LDP (document SD01) will be within Ebbw Vale. The committed sites within Ebbw Vale achieve an average density of 27 dph (excluding the Works site), significantly lower than the 35 dph assumed for the allocated sites which will come forward. Applying the lower average density (as an established precedent) to the allocated sites in Ebbw Vale would deliver 144 less housing units than the assumed 35 dph.

This clearly demonstrates the difficulties in achieving housing targets that will become apparent if the precedent density continues. Illustrated in the table below:

<b>Allocated sites - Ebbw Vale</b>					
Ref.	Address	Site area	Housing delivery at 35 dph	Housing delivery at 28 dph	Difference
H1.1	Willowtown	0.63	22	18	4
MU1	Ebbw Vale Northern Corridor	28 (20 ha assumed dev. area)	700	560	140
		<b>Total</b>	<b>722</b>	<b>578</b>	<b>144</b>



The average density of committed sites in the Upper Ebbw Fach region is 29 dph and in the Lower Ebbw Fach 32 dph.

Only Tredegar has achieved development densities which match the density assumed for all new allocations – an average 38 dph from the 11 committed sites, which is heavily influenced by the exceptionally high densities of the Former LCR and Goldmine sites.

If the presumed 35 dph cannot be met across the region, the identified need will not be met.

### **Summary**

The council should demonstrate an approach which is responsive to the market and allocates housing sites which are viable and deliverable, and amount to a total number which will realistically meet housing need.

We do not consider the high densities identified set an appropriate precedent of development which we would realistically expect to be repeated in the current market, or on the allocated sites identified. For this reason we suggest it appropriate for the council to lower the density presumed from allocated sites and allocate further sites to ensure the housing need identified is met.

The identification of additional housing allocations will become even more critical if the housing target is increased as discussed at the relevant hearing session.

We hope this submission will assist in your consideration, and look forward to the closing sessions and report of the examination.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Clare Lucey'.

**Clare Lucey**

Consultant – Development Consulting