

Preliminary Findings on Housing Provision

1. The hearings part of the examination began on 11 March. During the five sessions completed to date the overall strategy of the LDP, the amount and distribution of housing provision and those allocated housing sites where representors wished to participate in a hearing have been discussed.

Growth Model

2. The Council has adopted an employment-led growth model. Based on job growth and projected economic activity rates, this calculates the working-age population necessary to support the anticipated number of jobs and, related to that, the amount of housing needed. Comparisons with the Welsh Government (WG) population projections have been made, and when necessary adjustments, to ensure consistency.
3. The approach is in line with Planning Policy Wales' (PPW) support for economic and employment growth within the context of sustainable development as well as its advice that jobs and services should be aligned with housing wherever possible¹. It is also compatible with that taken in Swansea thus contributing to PPW's requirement that local planning authorities should work strategically and co-operatively².
4. Furthermore, the number of dwellings indicated in Neath Port Talbot by the 2011 Household Projections is substantially lower than in those of 2008. The economic-led method will thus avoid replicating a period of very poor economic performance, as advocated by the (then) Minister for Housing and Regeneration³.
5. We therefore consider that the use of the economic-led model to calculate housing provision is an aspirational, pro-active and appropriate approach. It will help the County Borough to benefit from locational and other advantages in order to redress previous economic stagnation.

Housing Requirement

6. The housing need set out in Policy SP 7 of the Deposit LDP was 8,000 which, with a 13% flexibility allowance, took the total requirement to 9,150. Following the release of some 2011 Census data and the publication of WG's 2011 Household Projections, focussed changes⁴ reduced the overall requirement to 8,350. These changes gave rise to several objections leading to the Council, helpfully, commissioning its consultant to review the economic model and update the calculations. As a result, the Council

¹ Planning Policy Wales edition 7 paragraph 7.1.3

² Planning Policy Wales edition 7 paragraph 7.1.5

³ Letter from Carl Sargeant to all local authorities dated 10 April 2014, ED013

⁴ Schedule of Proposed Focussed Changes, SD20, FC06-FC12

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adjusted its figures further⁵ and it was these which formed the basis of discussion at the hearing.

7. Following the hearing the Council has rightly incorporated the trend-based vacancy rate of 4% into the basic housing need. It has not applied a reducing vacancy rate and, for the reason set out in the response to Action Point 1, we are satisfied with that position.
8. A flexibility allowance of 10% is applied to the basic housing need. This is commonly accepted as an appropriate proportion which will help to ensure that housing need is provided for should not all sites come forward as anticipated.
9. The total housing requirement now proposed by the Council is 8,600 made up as follows:

Basic Housing Need + vacancy rate of 4%	7,500 + 300 =
	7,800
Flexibility Allowance = 10.26%	+ 800
Total Housing Requirement	8,600

10. All in all we consider that this provision is based on robust and appropriate evidence; we can find no justification for recommending a higher figure. The alteration from the deposit figure and, subsequently, the focussed change figure will be dealt with as a matters arising change (MAC).

Distribution

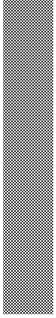
11. The LDP's Development Strategy is to facilitate growth in the County Borough with a focus on the Coastal Corridor whilst reinvigorating the Valley communities. Consequently the great majority of housing allocations are in Neath and Port Talbot. Outside of the Coastal Corridor, Pontardawe and the Upper Neath Valley are identified as Strategic Growth Areas. Whilst there is no policy differentiation between these and the wider Valleys Strategy Area, their designation provides a focus and encouragement for development without undermining the status of the surrounding area.

Supply of sites

12. The housing provision is met through allowances and allocations, with the latter being a mix of greenfield and brownfield, new sites and sites with planning consent (identified as 'landbank' sites). We continue to have

⁵ Observations on the Focussed Change Representations (January 2015), ED008, pp16-19

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concerns regarding the viability and deliverability of several of the allocated sites and it is, therefore, a matter which we will explore further at an additional hearing session.

Siân Worden

Nicola Gulley

Inspectors