



Geraint John Planning

Geraint John
E: geraint@gjplanning.co.uk
T : 02920 660244
F : 02920 660243
M : 07531 324325

Sophia House
28 Cathedral Road
Cardiff
CF11 9LJ

www.geraintjohnplanning.co.uk

18th February 2015

By Email: programmeofficer@npt.gov.uk

LDP Programme Office,
Room 220,
Civic Centre,
Port Talbot
SA13 1P

Dear Sir / Madam,

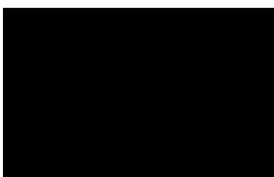
**Neath Port Talbot County Borough Council Local Development Plan Examination
Response to Matters and Issues: Matter 3: Housing Provision: Distribution and Amount**

Please find enclosed, on behalf of and under instruction from Cuddy Demolition & Dismantling Ltd, representations (supplementing previous evidence submitted), to the Local Development Plan Examination Hearing Sessions.

This submission relates to matters and issues raised by, and set out in, the ED011 Inspectors' List of Matters and Issues (Jan-15) to cover Hearing Matter 3: Housing Provision: Distribution And Amount.

We look forward to attending the Hearing Session(s) in due course. In the meantime we hope and trust that all is in order with this submission. Please do not hesitate to contact us in the event that further information is required or considered beneficial.

Yours sincerely



Geraint John
Director
Geraint John Planning Ltd.

Annex

Preface

This Annex relates to the matters and issues raised by, and set out in, the ED011 Inspectors' List of Matters and Issues (Jan-15) to cover Hearing Matter 3: Housing Provision: Distribution And Amount.

Each of the relevant issues raised in relation to the above matters are considered in detail below.

It should be noted that these representations do not respond to every question raised within the Inspector's Matters and Issues, as all of these questions do not necessitate a response by us, and/or earlier submissions made on behalf Cuddy Demolition & Dismantling Ltd are considered sufficient to address the matters raised. Accordingly, these representations only provide responses to questions where it is considered necessary and relevant to do so.

Summary of Overall Position

The key and principal representations previously submitted by Cuddy Demolition & Dismantling Ltd, and which are reiterated in response to the matters and issues raised by the Inspector for the Examination hearing sessions, are set out and detailed below, and are, in summary, as follows:

- The amount of housing provision within the Plan is generally supported, however it is considered that the Plan ought to increase its provision in order to be more positive and aspirational (as other Authorities are doing) – in line with the Welsh Government's drive to re-stimulate the housing market. An additional level of housing land supply should, in addition to those contingencies factored in to the Plan, therefore be made to make allowances for a buoyant housing market, and provide greater flexibility and deliverability over the Plan period;
- The distribution of housing within the Plan is over-reliant on Coed Darcy – which has known and identified constraints, complexities, and timing / delivery issues. Accordingly, the allocation of further sites of differing character and location is required to de-risk the deliverability of the Plan's housing land supply.

Response to Matters and Issues

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?

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

In terms of the supply of housing across the County Borough over the plan period (as set out within the Plan), it is noted and supported that the calculation of the housing provision requirement is based on sources of evidence in addition to the Welsh Government Household projections for Wales (2011-based). This is of course in accord with Welsh Government guidance - i.e. that the Welsh Government's household projections are a "starting point" and guide only, and should not be solely relied upon. As such, the level of provision within the Plan is greater than would have been shown should this have been calculated solely based on the Welsh Government projections. Notwithstanding this, and whilst this "more rather than less" approach is supported, it is considered that the Plan ought to present an even more robust, positive and aspirational approach - not least given the economic development/economic growth based strategy to the Plan.

Whilst it is appreciated that the suggested revised overall provision within the Plan (now 8,600 units - as provided for in Table 5.2 of the Observations on the Focussed Change Representations, January 2015), is, if accepted by the Inspector, greater than the revised housing requirement (7,000 units), it is still a marked and significant reduction from the original requirement (9,150 units – as provided for in the Deposit LDP) i.e. a reduction of 550 units. This, combined with the assertion that the 8,600 provides for, and builds-in, adequate contingency and flexibility (on the basis that the real target is 7,830 units) effectively means that the reduction is more akin to 1,100/1,200 units. For these reasons it is considered that the housing provision ought to be more in line with the Deposit version provision i.e. circa 9,000 units.

It is considered that additional housing should be allocated in order to provide greater flexibility, and in order to encourage the development of housing – as advocated by Carl Sargeant, Minister for Housing and Regeneration in the written statement – ‘Stimulating Home Building in Wales’ (amongst other statements and initiatives). For these reasons, the current level of housing provision within the LDP is considered to under-provide for housing development, and is considered likely to result in an unnecessary and unhelpful restriction to the housing market and supply (particularly in combination with the distribution constraints and deficiencies identified).

These risks are, in our view, real, and have manifested themselves in other LPA’s whose LDPs have recently been adopted – including RCT and Caerphilly for example. As a result of a range of factors, including inadequate overall provision initially and inadequate flexibility and deliverability, both Plans have failed to provide a 5 year housing supply only a few years after adoption. The position in respect of the housing supply of these Authorities is illustrated in the table below.

LPA	Date of LDP Adoption	Housing Land Supply following LDP Adoption	Current Housing Land Supply
Rhondda Cynon Taf County Borough Council	02/03/2011	5.3 years ¹	2.8 years ²
Caerphilly County Borough Council	23/11/2010	4.3 years ³	2.5 years ⁴

Whilst it is acknowledged that the context to housing supply differs in each authority, it is considered that additional supply/provision (through both additional allocations and contingencies) (as utilised by a number of Authorities) is necessary to make allowance for a buoyant housing market. This would be appropriate, and moreover beneficial, in order to ensure that housing is delivered. Such a provision is a necessary component of a robust local housing supply, and will also result in significant economic benefits – generating growth and jobs etc. which would be consistent with the LDP Vision, and the policy landscape at national level.

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?

Distribution of Housing Supply

The Plan’s distribution is based on a number of spatial areas. These have been defined to reflect the varying geographical, social, and economic characteristics of constituent parts of the Plan area. The focus of housing growth (historically, and as part of the Plan going forward – for various different reasons) is on the Neath and Port Talbot spatial areas. Whilst the focus of growth is on the ‘Coastal

¹ Joint Housing Land Availability Study 2011, RCT, May 2012

² On the basis of liaison with RCT Planning Officers, it is understood that the forthcoming (March 2015) RCT Joint Housing Land Availability Study 2014 will state that the Council’s level of housing land available has decreased to 2.8 years housing land supply.

³ Joint Housing Land Availability Study 2011, CCBC, May 2012

⁴ Joint Housing Land Availability Study 2014, CCBC, November 2014

Corridor', the LDP Development Strategy aims to 'reinvigorate the Valleys' – as set out in Paragraph 2.3.11 of the Deposit LDP. This strategy is generally supported, as it recognises the need to achieve a balance in terms of housing provision, whilst ensuring that sufficient development is provided within the Valley communities to provide for their continued regeneration. Although Glynneath is identified as a Strategic Growth Area, it is not considered that a high enough level of housing is focused within the settlement of Glynneath to achieve the significant levels of growth and development that is anticipated (i.e. as required to generate the associated positive impacts in terms of the benefits of regeneration more widely).

As noted above, the overall housing requirement within the Plan has increased from 8,350 within the Schedule of Proposed Focussed Changes – An Addendum to the Deposit LDP (September 2014) to 8600 as suggested within the Observations on the Focussed Change Representations (January 2015). Whilst this increase is supported in general terms, the suggested change to the Plan's approach of increasing to 8,600 units is to simply add 250 units to Coed Darcy. This, as opposed to bringing in new sites raises concern, as it compounds the issues and risks with delivery in our view. As a result of the this approach the share of the overall housing provision has increased in the Neath Spatial Area from 50.5% to 51.9%, and decreased in the Neath Valley from 5.0% to 4.8%, and it is accordingly considered that the Neath Valley Spatial Area is under-provided for, and will suffer from a shortfall of, housing provision over the plan period as a result.

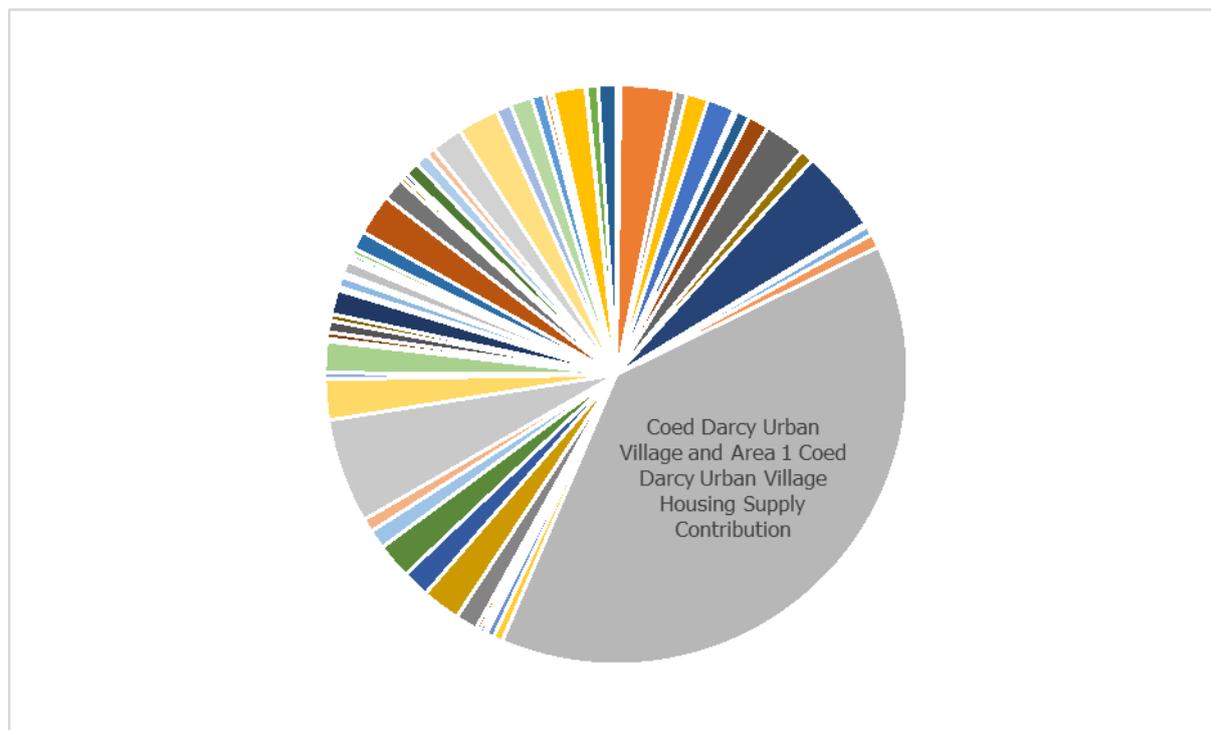
Whilst sites have been identified within each spatial area, Coed Darcy is viewed and deemed by the Plan to contribute/make provision for more than one spatial area, as noted in Population and Housing Topic Paper (September 2014) submitted as part of the LDP:

*"The Strategic Regeneration Areas (SRA) located at **Coed Darcy**, Neath and Harbourside, Port Talbot will by virtue of their scale and location, particularly in the case of the former, **help to meet the future housing needs of the County Borough as a whole. The impact the SRA sites will extend beyond their immediate areas and spatial area boundaries.**" (Paragraph 9.5.10)*

It is accordingly considered that there is an over-reliance in terms of the County Borough's supply of housing on Coed Darcy, and that such a high provision on this one site limits and undermines the opportunity for regeneration and growth in the Neath Valley, as discussed further below.

The table and chart below provides a comparison between the number of units within the Coed Darcy Urban Village and Area 1 Coed Darcy Urban Village sites, and the other housing allocations identified within the Plan.

Site	Average Units Allocated Per Site
Coed Darcy Urban Village	2,400
Area 1 Coed Darcy Urban Village	157
All other allocated sites	68.695



Distribution of Housing Supply amongst Housing Allocations

The allocation of 2,400 units on the Coed Darcy Urban Village site alone represents circa 28% of the total housing requirement.

As noted above, the Plan considers that Coed Darcy will 'help to meet the future housing needs of the County Borough as a whole' with 'the impact' of the site extending 'beyond [its] immediate areas and spatial area boundaries' - despite being firmly located within the Neath / Swansea 'catchment' area, as opposed to the Neath Valley 'catchment'.

Considerable questions are raised on the reliance on the Coed Darcy site to serve any proportion of the Neath Valley Spatial Area / housing market, and it is considered that it is more likely that Coed Darcy will absorb a proportion of Swansea's housing requirements over the Plan period, due to the close transport links between Swansea and the development site, and the major developments which are likely to come forward to the east of Swansea and close to Fabian Way, which will further shift the focus towards the eastern edge of Swansea.

In light of this evidence, it is considered that the reliance of the Coed Darcy site to serve 'beyond [its] immediate areas and spatial area boundaries' - in particular, the Neath Valley Spatial Area, is too great. Accordingly the Neath Valley Spatial Area is under-provided for, and will suffer from a shortfall of, housing provision over the Plan period as a result.

In light of the above, it is considered that the Plan, in its current form, represents a 'one strategic site plan' - which is considered highly risky (not least given the experience of other Authorities who have adopted a similar strategy - albeit over a small number of strategic sites). Whilst the allocation and development of Coed Darcy is supported in general terms (not least given its previously developed land and committed status), the over-reliance on it to deliver the amount of housing required is considered to represent a significant risk to the supply of housing over the entirety of the Plan period, the entire plan area, and the Neath Valley spatial area in particular.

Over and above threats and risks to supply, the approach adopted is considered likely to have an adverse effect on the LDP Development Strategy aim of 'reinvigorating the Valleys' – house purchasers in the Neath Valley area would be 'forced' to locate at Coed Darcy as a result of the restricted supply in the Neath Valley spatial area. This would compound the current challenge of 'out migration' in the Valleys - as identified in Paragraph 2.5.32 of the Deposit LDP - but also moreover be counter-productive to the strategic initiatives to provide 'managed growth' within the settlements of the Valleys, such as Glynneath.

Deliverability Issues

As a result of the known constraints associated with the previously developed nature of the Coed Darcy site, and due to the fact that the site is subject of an extant outline planning permission with explicitly defined parameters to work within, it is considered that the site is likely to yield and provide at a lower delivery rate than anticipated. The ability and scope for Coed Darcy to be flexible to expand and/or be responsive to any required increase in numbers (increased density etc.) is diminished by these factors i.e. an outline planning permission with, and subject to, a tight regime (Design Code etc.).

The Phasing and Delivery of New Housing Provision (NPT, January 2015) schedule (Appendix 2) sets out the following predicated build rates at Coed Darcy Urban Village for the first five years of Plan period:

Site	2015/16	2016/17	2017/18	2018/19	2019/20
Coed Darcy Urban Village	125	140	170	190	215

The predicated build rates for Area 1, which forms part of the wider Coed Darcy Development of course, and is in effect (at least for housing delivery and yield) part of the same development scheme and market as such, are set out as follows:

Site	2015/16	2016/17	2017/18	2018/19	2019/20
Area 1 Coed Darcy Urban Village	30	30	30	30	10

The site, being previously developed land, is acknowledged as having greater site constraints than a greenfield site. It is therefore considered that the predicated delivery rates for the Coed Darcy Urban Village site are too high. This stance is agreed within the Stated Position of the Home Builders Federation and the BJ Group in the Neath Port Talbot Joint Housing Land Availability Study: Draft Statement of Common Ground (February 2015).

Given the present economic climate and the need to increase housebuilding generally, there is a need for readily developable and economically viable sites to be identified. Accordingly, it is considered that additional greenfield sites should be allocated in order to counter-balance the likely delays in bringing forward development on the Coed Darcy site (on which the Plan is heavily reliant). The threat or potential of this is of course identified as a key matter / issue by the Inspector i.e.: *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?*

A further factor and limitation arising from, and unique to, Coed Darcy is the resultant under-provision of affordable housing (given the deferred provision of such housing in the early phases of the development). Given the critical need for affordable housing there is a need to identify available, deliverable, and a viable sites that are capable of making provision for such need.

Accordingly, as noted in the Preface to this representation, it is considered that there is an over-reliance in terms of the County Borough's supply of housing on Coed Darcy, and that the increased distribution / allocation of housing on and of sites of differing character and location is required in order to de-risk the deliverability of the Plan's housing land supply, and to ensure that the Plan is able to provide for the required level of housing need and maintain a 5 year housing land supply.

Concluding Remarks

In light of, and as a consequence of these representations, it is considered that:

- The amount of housing provision within the Plan is generally supported, however it is considered that the Plan ought to increase its provision in order to be more positive and aspirational (as other Authorities are doing) – in line with the Welsh Government's drive to re-stimulate the housing market. An additional level of housing land supply should, in addition to those contingencies factored in to the Plan, therefore be made to make allowances for a buoyant housing market, and provide greater flexibility and deliverability over the Plan period;
- The distribution of housing within the Plan is over-reliant on Coed Darcy – which has known and identified constraints, complexities, and timing / delivery issues. Accordingly, the allocation of further sites of differing character and location is required to de-risk the deliverability of the Plan's housing land supply.