

Representor ID: 0017

Neath port Talbot LDP Submission

Hearing Session 3/4 Comments

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Matter 3: Housing Provision – Distribution and Amount

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?

HBF considered that the current position is confused by the number of times the figures have changed and the various reports produced, accordingly we request that the current position and figures are clarified.

Yes in part the level of housing provision is supported however it is felt that it could be slightly higher for two reasons.

Firstly the addition of the 4% vacancy rate to the household requirement to provide a delivery figure of 7830 [question the maths 4% of 7511 = 300 so total should be 7811].

Secondly a desire to be more ambitious with economic growth based on the Swansea Bay City Region report (see later comments).

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?

Concerns are raised at the heavy reliance on one large strategic site, it is considered that there is always risk associated with the delivery of such large sites, particularly in this situation due to its brown field nature and former use. The allocation of 2,400 units on this site represents 35% of the total housing requirement (landbank + allocated sites 6965). Allocation of other greenfield sites close to existing settlements would not only be sustainable but would also reduce delivery risk and secure a wider choice for future occupiers. The other way to reduce risk would be to increasing the level of flexibility, it is felt that this can be justified in this case due to the heavy reliance on one site and more generally brown field sites.

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?

Yes in part, however we raise concerns at the heavy reliance on one (brown field site) which we consider increases the risk of non-delivery. Increased development around existing settlements would help support Objective 3 – ‘Deliver sustainable, safe and confident communities and develop vibrant settlements supporting a range and mix of facilities and services’ and Objective 7 – ‘Provide an adequate supply, mix, type and tenure of housing within sustainable settlements to meet the needs of the projected population.’ Therefore bringing the plan more in line with the objectives of the LDP.

Amount

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

We note that the figure proposed is above the 2011 WG house hold projections, although these are only meant to be used as the starting point for the calculation of housing need in the area (Ministers letter). The Council have made it clear they are being aspirational and basing the plan on an economic growth model which is supported, all be that we suggest it could go further.

What is the methodology for translating the number of jobs into the number of homes required?

It is considered that some confusion is being caused by the fact that although the number of houses required has changed a number of times the number of jobs required hasn't. In particular little consideration appears to have been given to the evolving Swansea Bay City Region (SBCR) which is very aspirational in terms of the potential for growth of the wider region. In fact the latest report identifies as one of its key steps forward the need to 'Research the compatibility of the 'big ticket' items within the Region LDP's'. It is considered the NPT have the opportunity to show their commitment to and support for the SBCR by setting their housing target at a level which will help support the economic growth of the area.

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?

If they are not realistic the limit on development imposed by the plan could hold back economic growth. In particular the shortage of a range and location of housing could deter wider sustainable economic growth. This is particular relevant when looking at NPT's role as part of the wider Swansea Bay City Region. A lack of a range of housing could lead to housing going elsewhere in the city region which would be contrary to the plans aims to drive the areas future through sustainable economic growth.

What is meant by the terms 'vacancy rate' and 'flexibility allowance'? Will these be reasonable and appropriate?

This is for the Council to clarify however we believe that there interpretation as stated in the documents is not correct. There will always be a proportion of the housing stock that remains empty to enable the process of buying, selling and letting to work efficiently, whilst some will be empty to allow repairs and improvement. This applies equally to newly built homes and to existing dwellings. These vacancies are known as 'transactional vacancies' and most are brought back into use quickly and without intervention. In Wales it is estimated that the effective minimum level of empty homes as a result of these processes is around 4% of the housing stock. The figure varies slightly from local authority to local authority depending on evidence, however, generally speaking a level of 4% is considered sound.

We believe the Council has confused the issue here. The Empty Homes Strategy would deal with long term vacancies and not transitional vacancies, which is an entirely different matter. Transitional vacancies are 'required' to help facilitate movement in the housing market and therefore cannot be 'brought back into use permanently' by an empty homes strategy.

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

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?

It is noted that at para 4.2.67 of the Councils Housing Paper Sept 2014 that affordable housing has been excluded from the calculation of site densities. The justification given for this is not supported, particularly as there is a requirement to provide affordable housing as part of private developments it is considered that this method of calculation is misleading. We would also warn against the use of average densities as this can be misleading, particularly if a single type of housing dominates in terms of numbers

delivered. Consideration should be given to at least separating out green field developments and brown field developments, particularly as the plan is so heavily reliant on brown field sites.

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?

It is for the council to provide the 5 year land supply based on what is proposed but it is noted that the current figure, although not yet confirmed by WG due to a dispute on the delivery rates on the Coed Darcy site will be below 2.5 years. It is also noted that there are some discrepancies between the latest projected delivery figures (document ED010) and those shown in the current JHLAS in terms of in what years units will be delivered.

We note that 3,972 of the units are within the land bank and either have planning consent or have been previously allocated in the UDP but have to date not been built. This is over 50% of the total housing requirement and we are concern that this increases the risk of the plan not delivering. As stated elsewhere an increased number of previously unallocated green field sites would help to reduce this risk.

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?

No not all the sites in the landbank are in the 5 year supply a number of them are in category 3i. It is very difficult for the Council to give any assurances that sites will come forward within a set period as a number of factors which affect deliverability are outside of the control; of the Council. However the current strategy which relies heavily on one site and a high number of brown field sites does increase the risk of failure of delivery particular in the early years of the plan. As an industry we are committed to building as many new homes as we can, however, from experience brown field sites often taken longer to develop than planned due to unknown and know constraints.

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?

The 2014 JHLAS indicates the past built rates for small sites since the start of the plan as [51, 31, 44, 39] giving an average figure of 41. With the average over the last 13 years being 61. Accordingly the figure of 54 is supported.

It is noted that the Councils Housing Paper 2104 talks about an average windfall allowance of 85 units per year, this is as a result of an increase in the number of windfalls estimated from 825 to 1275. We would argue that windfall by their nature cannot be calculated and it is normal practise to rely on previous trends based on actual completions. In increasing the windfall allowance there also appears to be some double counting of sites which are included within the allocated sites, further clarification on this point is requested. Again the figure has changed in different documents so clarification is required over which figure the Council are using.

Distribution

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

We consider that Consultation Report Volume 4: Appendix 1 Responses & Recommendations to the Register of Alternative Sites Representations (September 2014)

gives very limited justification for non-inclusion of any of the alternative sites generally relies on a simple statement 'The objection to the inclusion of the site supports the Council's position as set out in the Deposit Plan.'

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

It is not considered that it has been made clear why alternative sites have not been included, for example a simple scoring matrix of the main 'sustainability' and 'deliverability' issues would have made the Council's decision clearer.

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?

This is for the Council to explain, however we note that our comments above regarding over reliance on one site, brown field sites, and landbank sites does in our view increase the risk of the plan not delivering, particularly in the early years. The allocation of additional green field sites as proposed by some of the candidate sites would increase flexibility and potentially help delivery earlier in the plan period.

Should there be a policy to encourage self-build housing schemes?

We would support this in principle as it helps to increase the level and range of house building, however carefully consideration needs to be given to how this would work in practice, particular if a policy was linked to the larger allocated sites.

Are there sufficient housing allocations in the Valley Strategy Area?

Historically these areas have been hard to develop due to a range of constraints such as, topography, ground conditions, former land uses and viability issues. For this reason it is considered that although the number of allocations are low in these areas the plan strikes the right balance between provided a mix and range of housing sites and deliverability with regard to the valley areas. We would not support a significant increase in sites within these valley areas because the constraints listed above would increase the risk of not delivering the plan's objectives particularly with regard to housing numbers. It could also reduce the number of affordable units delivered.

Key Issue: Are the policies for Open Space clear, reasonable and appropriate?

Why is greenspace² not covered by the LDP Open Space Assessment? In this respect is the LDP consistent with PPW and TAN 16: *Sport, Recreation and Open Space*?³ Should Policy OS 1 be amended to include reference to the accessible greenspace standards?

How has the threshold of 3 or more dwellings identified in Policy OS1 been defined? What projected level of new open space provision will be generated by the policy? Where will it be located?

Our concern is that the policy or supporting text make no mention of commuted sums in lieu of provision. The threshold of three is considered to be far too low as the resultant area of open space required could not practically be delivered on site.

Does Policy OS 2 refer only to the types of open space described in LDP paragraph 5.1.53? If so, how will areas of greenspace be protected? Are Policy OS 2 and paragraph 5.1.61 sufficiently clear on this matter?

Matter 4: Housing Provision – allocated sites

Key Issue: Have relevant alternatives been considered, is the identification of the housing sites based on a robust and rational site selection process? Are the sites deliverable within the plan period and will they make an appropriate contribution towards the housing requirement.

The concern here is that the overreliance on one brown field site (Coed Darcy) has affected the Councils decision making process with regard to alternative sites. The reliance on large scale brown field site with the addition of a number of other brown field sites does increase the risk of not meeting the delivery targets, particularly in the early years of the plan. These types of sites by virtue of their constraints take longer to start developing. Viability issues are far more likely to occur with such sites as a result of 'unknowns' occurring during development and this has the potential knock on effect of reducing the level of affordable housing being delivered on these sites.

Are the policies for the housing sites clear, reasonable and sufficient?

The HBF do not intend to comment in detail on individual sites.

For each site discussed at a hearing session the following will be considered:

- Is it clear why the sites have been selected over other candidate and alternative sites
- Are the numbers of units identified realistic and achievable?
- What are the various constraints affecting the sites? In the light of constraints, and other matters, where is it set out what the requirements are for each site? Is there sufficient clarity and certainty?
- Having regard to constraints, where they exist, as well as the need to provide for affordable housing and infrastructure, are the sites viable?
- Are the delivery mechanisms for each site clearly identified? Is the timing and/or phasing of each site clearly set out?