Mr Richard Davies (0076)

Further Submission for Neath Port Talbot Local Development Plan – Examination

I write with further comment regarding the employment led growth model used by NPT. Peter Brett Associates submitted a report in September 2012. This was used as the employment led data to propose the need for 8,027 additions homes. Now just over 2 years later PBA have released an amended report. Please find below a table showing the key data from each report.

Deposit EE Adj+ Scenario (+3850 Jobs)					
PBA Report - October 2012			**PBA Final Report - January 2015**		
a. Economically active 2011	59,775		a1. Economically active 2011	64,110	**107%**
			a2. Working age population 2011	89,124	
b. Population 2011	139,266		b. Population 2011	139,812	100%
c. Households	64,241		c. Households	60,393	**94%**
d. Net gain of jobs (minus 5%for double jobbing allowance)	3,658		d. Net gain of jobs (minus 5%for double jobbing allowance)	3,658	100%
e. Net change in unemployment 2011-2026	-1,913		e. Net change in unemployment 2011-2026	-1,923	101%
f. Economically active 2026 (f=a+d+e)	61,520		f. Economically active 2026 (f=a1+d+e)	65,845	**107%**
g. Working age population 2026 (g=f*(1/73%))	84,274		g. Working age population 2026 (g=f*(1/76%))	86,638	103%
h. Total population 2026 (h=g*(1/57.5%))	146,309		h. Total population 2026 (h=g*(1/58.8%))	147,343	101%
i. Private household population 2026 (i=h-2.2%)	143,091		i. Private household population 2026 (i=h-0.96%)	145,928	102%
j. Total number of households 2026 (j=i/1.98 persons per household)	72,268		j. Total number of households 2026 (j=i/2.15 persons per household)	67,874	**94%**
k. Number of additional homes 2026 (k=j-c)	8,027		k. Number of additional homes 2026 (k=j-c)	7,481	**93%**
l. Population change 2011-2026	7,043		l. Population change 2011-2026	7,531	**107%**

It can be seen that there are some significant differences in the numbers used. These differences have occurred over a short period of the plan development and are an indication of the level of uncertainty.

In addition, PBA state that the variables e.g. average household size, will need to be monitored carefully for effects to the required number of houses. I add that the achievement of job growth on which the above is based will also need careful monitoring. Will the very optimistic job growth numbers be realised?

There is significant uncertainty with regard to the required housing numbers. If the number given by the 2011 Based Household Projections for Wales is used directly only 2,319 houses are needed. I appreciate that the Housing Minister has mentioned the recent economic conditions in relation to this figure. However by 2011, only 3 years of the period had been affected by the financial crisis.

Against the background of these levels of changes & uncertainty I cannot agree that a plan is sound if it only has tolerance in one direction. The proposed plan only has significant positive tolerance. I see no comments regarding the negative effects of over- supply of housing & unnecessary loss of green fields.

I propose reducing & / or delaying the release of New Allocation Greenfield sites. This would support Key Issue 14 - to focus development for our brown field sites and Key Issues 11 & 12 – saving our green fields.

Please see the table on page 3. This shows the 13 New Allocation Green Field sites proposed. The total housing number is 1,545. I propose this number can be deleted or held back as the negative tolerance of the plan. If & only if the levels of jobs growth & associated population are being realised then these green field sites could be released towards the second half of the LDP.

I have modified the building time on this chart from the original in the document "Phasing & Delivery of New Housing Provision – Jan 2015". I have moved all the times so that the last year of each build is in the last year of the plan. This means a lower build level between years 2013 to 2021 and then a higher build from years 2022 to 2026. The overall number remains the same.

Not having a negative plan tolerance means the risk of unnecessary loss of green field sites and over supply of houses to the market.

Please consider my proposal to make the plan sound.

13 New Allocation Greenfield Sites																					
						Year	**2011/ 2012**	**2012/ 2013**	**2013/ 2014**	**2014/ 2015**	**2015/ 2016**	**2016/ 2017**	**2017/ 2018**	**2018/ 2019**	**2019/ 2020**	**2020/ 2021**	**2021/ 2022**	**2022/ 2023**	**2023/ 2024**	**2024/ 2025**	**2025/ 2026**
					Units																
		Neath	N	B																	
H1/2	**Leiros Parc Extension**	**Neath**	New	Greenfield	200										10	25	35	35	35	35	25
H1/3	**Groves Road (Phase 2)**	**Neath**	New	Greenfield	42															21	21
H1/8	**Crymlyn Grove (Phase 2)**	**Neath**	New	Greenfield	75													11	25	25	14
H1/9	**Crymlyn Grove (Phase 3)**	**Neath**	New	Greenfield	150												30	35	35	35	15
H1/10	**Wern Goch, Skewen**	**Neath**	New	Greenfield	50													2	18	15	15
H1/11	**Neath Road/Fairyland Road, Tonna**	**Neath**	New	Greenfield	300						20	30	30	30	30	30	30	30	30	30	10
H1/12	**Blaenbaglan School (r/o), Baglan**	**Port Talbot**	New	Greenfield	141											10	25	25	25	25	31
H1/13	**Hawthorn Close, Cwmafan**	**Port Talbot**	New	Greenfield	100											10	20	20	20	20	10
H1/24	**Bryn Morgrug (Phase 2)**	**Pontardawe**	New	Greenfield	52														10	25	17
H1/25	**Ynysymond Road, Alltwen**	**Pontardawe**	New	Greenfield	50														10	20	20
H1/27	**Waun Sterw / Waun Penlan**	**Pontardawe**	New	Greenfield	115											15	20	20	20	20	20
H1/28	**Bryn Brych Farm, Rhos**	**Pontardawe**	New	Greenfield	150									20	20	20	20	20	20	20	10
H1/29	**Compare / GMF**	**Swansea Valley**	New	Greenfield	120												20	25	25	25	25
		New Greenfield Allocation - Latest possible start date					**0**	**0**	**0**	**0**	**20**	**30**	**30**	**50**	**60**	**110**	**200**	**223**	**273**	**316**	**233**
				Original schedule			**213**	**242**	**260**	**328**	**428**	**491**	**557**	**603**	**615**	**603**	**589**	**549**	**519**	**508**	**460**
		Landbank & Non Greenfield New Allocation					213	242	247	275	303	289	361	418	435	453	449	439	444	433	419
				New Schedule			**213**	**242**	**247**	**275**	**323**	**319**	**391**	**468**	**495**	**563**	**649**	**662**	**717**	**749**	**652**
				Difference			**0**	**0**	**13**	**53**	**105**	**172**	**166**	**135**	**120**	**40**	**-60**	**-113**	**-198**	**-241**	**-192**
									Less houses								**More houses**				