



Neath Port Talbot County Borough Council

# Local Development Plan 2011 – 2026

## Examination Statement

### Matter 3: Housing Provision – Amount & Distribution

(March 2015)





<b>1</b>	<b>Housing Provision (Amount &amp; Distribution)</b>	<b>1</b>
1.1	Key Issues	1
1.2	Amount	1
1.2.1	Question 1	1
1.2.2	Question 2	3
1.2.3	Question 3	4
1.2.4	Question 4	6
1.2.5	Question 5	8
1.2.6	Question 6	9
1.2.7	Question 7	9
1.2.8	Question 8	10
1.2.9	Question 9	10
1.3	Distribution	14
1.3.1	Question 10	14
1.3.2	Question 11	15
1.3.3	Question 12	16
1.3.4	Question 13	16
1.3.5	Question 14	17
1.4	Open Space	19
1.4.1	Question 15	19
1.4.2	Question 16	20
1.4.3	Question 17	22
<b>A</b>	<b>Appendix - Flexibility Allowance</b>	<b>23</b>

# Contents

Examination Statement: Matter 3 - Housing Provision (Amount & Distribution)

# 1 . Housing Provision (Amount & Distribution)

## 1 Housing Provision (Amount & Distribution)

### 1.1 Key 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?

**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?

**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?

**KEY ISSUE:** Are the policies for Open Space clear, reasonable and appropriate?

**1.1.1** The Council considers that these key issues have been satisfactorily addressed as set out in the detailed responses below.

### 1.2 Amount

#### 1.2.1 Question 1

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

**1.2.1.1** The most recent Welsh Government household projections were published on 27th February 2014, they are based on the 2011 mid-year population estimates for 2011. These 2011 Census based projections replaced the previous 2008 based projections which were used as a starting point for assessing the housing requirements for the Deposit Plan, as required by PPW<sup>(1)</sup>.

1 Paragraph 9.2.2 of Planning Policy Wales (PPW) Edition 7 (2014).

# 1 . Housing Provision (Amount & Distribution)

**Table 1.2.1.1 2011-Based Principle Household Projections**

	2011	2016	2021	2026
Neath Port Talbot	60,400	61,200	62,000	62,700

Source: WG 2011-based Local Authority Household Projections

**1.2.1.2** The assumptions underlying the 2011 based projections are founded on past trends which have been significantly affected by recent past economic conditions resulting from the global economic crisis. The results of which has given rise to lower household projections and higher household sizes than previously projected for Neath Port Talbot by the 2008-based projections.

**1.2.1.3** The implications of the 2011-based projections have been addressed within Document Ref: ED009 <sup>(2)</sup> and the findings summarised within Document Ref: ED008 <sup>(3)</sup>.

**1.2.1.4** The following table sets out the alternative 2011-based household projections:

**Table 1.2.1.2 : 2011-Based Household Variant Projections**

	Principle Projection	High Fertility and Life Expectancy	Low Fertility and Life Expectancy	10-yr Average Migration	Zero Migration
2011	60,396	60,396	60,396	60,396	60,396
2026	62,715	63,203	62,026	64,727	61,531
Households at 2026	+2,319	+2,807	+1,630	+4,331	+1,135

Source: WG 2011-based Local Authority Household Variant Projections

**1.2.1.5** Based on the Principle population projection, the number of households required in Neath Port Talbot by 2026 is 62,715, an increase of just 2,319 households. These projections do not make allowances for the effects of local or central government policies, this coupled with the assumptions based on past trends (reflecting the poor economic conditions), has resulted in a much lower household requirement than the 2008-based projections. The 2008-based household projections estimated the number of households at 2011 to be 64,241, increasing to 74,307 households by 2026, equating to a housing requirement over the Plan period of 10,066 new households.

**1.2.1.6** The ministerial letter <sup>(4)</sup> issued by Carl Sargeant on 10th April 2014 re-emphasised Welsh Government policy and expectations relating to the use of household projections in the planning system. The letter highlighted that the 2011-based projections had been affected by recent economic conditions and advised Authorities to consider these issues and use the new projections as a starting point, whilst considering all sources of local evidence available.

2 Review of Levels of Growth 2015 (Peter Brett Associates)  
 3 Observations on the Focussed Change Representations  
 4 Document Ref: ED013

# 1 . Housing Provision (Amount & Distribution)

**1.2.1.7** In light of the 2011-based projections, PBA <sup>(5)</sup> assessed the new information from the Census, projections and contextual data on performance to determine which assumptions should be used to inform an updated calculation of the housing requirement.

**1.2.1.8** The base data on Population, Households, Working Age Population and Economically Active was taken from the Census whereby the assumptions on economic activity and average household size were adjusted to ensure consistency with the ambition for a more positive future (which recognises that the County Borough is planning for growth rather than planning for the recessionary trend to continue) and accurately translated into the new homes target. Further information on this can be found within Document Ref: ED009 <sup>(6)</sup>.

**1.2.1.9** The level of growth now reflects the most recent projections but still maintains the aspirational economic objectives set out within the Plan's vision. In addition to the employment led housing requirement, PBA advised it necessary to consider the demographic led housing requirement <sup>(7)</sup>. The idea being to identify what population and labour supply is required to deliver the jobs and whether the demographic projections show that the population constrains this level of growth. This exercise identified a level of population growth over that required to deliver the jobs and subsequently a higher housing requirement.

**1.2.1.10** The amount of housing proposed over the plan period (2011-2026) (reflecting the Council's economic aspirations) is 7,511 households. Relating this to the 2011 based principle projection presents an increase of 5,192 households and 3,180 households in relation to the 10-year migration variant.

## 1.2.2 Question 2

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

**1.2.2.1** The LDP Growth strategy is based on an economic-led scenario which uses job growth and projected economic activity rates to identify the required working age population to support the projected number of jobs.

**1.2.2.2** The basis of the calculation is the acknowledgement that only a percentage of the population is likely to be economically active and subsequently the total population including residents that are economically inactive must grow proportionally to support economic growth (e.g. facilitate growth in economically active residents).

5 Peter Brett Associates

6 Review of Levels of Growth 2015 (Peter Brett Associates).

7 Based on the 2011 population projections 10-year migration variant.

# 1 . Housing Provision (Amount & Distribution)

**1.2.2.3** This approach enables the Council to identify the level of housing required to meet its economic objectives within the population projection framework established in the WG 2011 population projections (10-year migration variant) and ensure that its housing and employment strategies both within the County Borough and the wider regional context are aligned.

**1.2.2.4** The methodology<sup>(8)</sup> for translating the number of jobs into the number of homes is set out within Table 2.1 *Employment -led housing requirement 2011-2026* of Document Ref ED009. It lists the assumptions used, sources of information and rationale behind the calculation.

**1.2.2.5** Within this document PBA also assessed the 2011 Census information, projections and contextual data on performance and included economic assumptions within the economic model based on the Council's planned interventions to reduce unemployment and increase the economic activity rate in order to address the Plan's key issues and objectives.

**1.2.2.6** This combined with the overall level of economic growth potential identified in the Joint Economic Study<sup>(9)</sup> and adjustments made to the average household size to ensure consistency with the ambition for a more positive future, leads to a deviation in the population projections and subsequent housing demand set out in the WG 2011 principle projections of +5,159 households.

## 1.2.3 Question 3

**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?**

**1.2.3.1** The Council is confident the economic-led growth model is robust and the strategy deliverable. Evidence provided within Table 2.2 *Change in Average ILO Unemployment Rate 2011-2013* and Table 2.3 *Change in Economic Activity Rate 2005-2014* within Document Ref: ED009<sup>(10)</sup> provides an indication of the economic progress that has been made within Neath Port Talbot since the base date of the Plan (2011) and underpins the rationale for adjusting the assumptions to reflect contextual data on economic performance in the light of the 2011 Census data and projections.

**1.2.3.2** The table below sets out the Average Household Size (AHS) for Neath Port Talbot as indicated by the 2008-based household projections. The projections indicated that Neath Port Talbot's AHS would reduce from 2.15 in 2011 to 1.97 in 2026, a fall of 0.18.

8 Further detailed information on the methodology can be found within Section 7.4 Economic Assessment and Employment Land Provision for Swansea and Neath Port Talbot (Peter Brett Associates 2012) - Document Ref: EB14.

9 Document Ref: EB14

10 Review of Levels of Growth 2015 (Peter Brett Associates).

# 1 . Housing Provision (Amount & Distribution)

**Table 1.2.3.1 Average Household Size for NPT: 2008-Based Projections**

Year	2011	2016	2021	2026
Average Household Size	2.15	2.07	2.02	1.97

Source: Welsh Government 2008-Based Household Projections

**1.2.3.3** In comparison, the 2011 Census identified an AHS of 2.30. This was projected to reduce to 2.25 in 2026, which is 0.28 higher than the previous 2008-based projections. However, these projections have factored in a period of recession and it is recognised that household formation rates may have been constrained as a consequence.

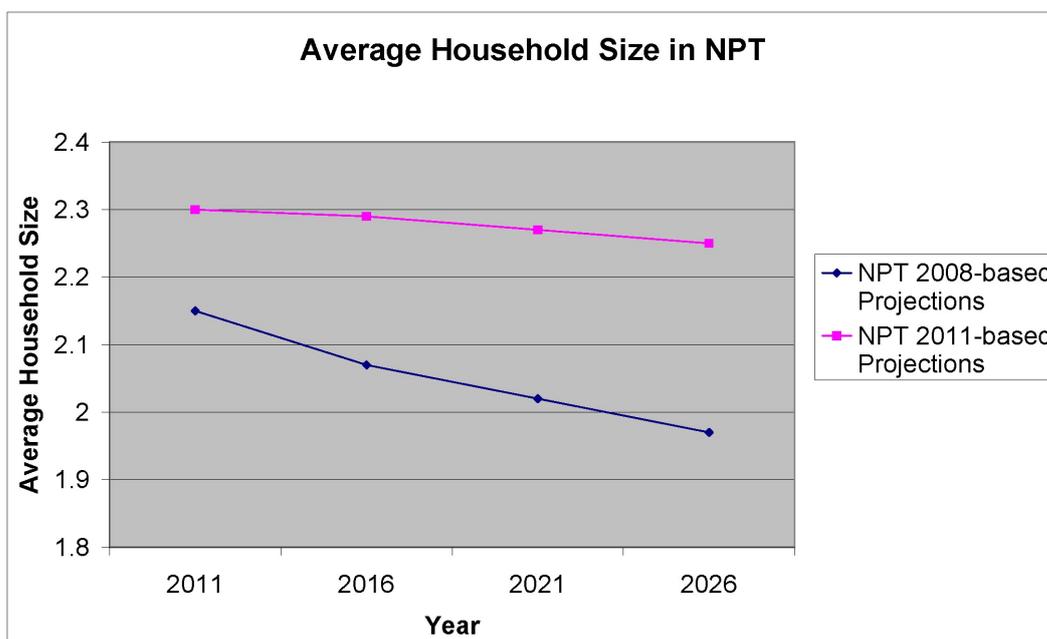
**Table 1.2.3.2 Average Household Size for NPT: 2011-Based Projections**

Year	2011	2016	2021	2026
Average Household Size	2.30	2.29	2.27	2.25

Source: Welsh Government 2011-Based Household Projections

**1.2.3.4** The graph below illustrates the striking difference between the two sets of projections. The 2011-based projections predict a larger household size at 2026 when compared with the 2008 projections. This vast difference has major implications to the anticipated level of households projected by the end of the LDP period and indicates a reduced requirement for new housing by 2026.

**Figure 1.1 Average Household Size in NPT (2008 and 2011 Based Projections)**



Source: Welsh Government 2008 and 2011-Based Local Authority Household Projections

# 1 . Housing Provision (Amount & Distribution)

**1.2.3.5** The table below sets out the average household size for Neath Port Talbot from 1991 to 2013. It takes into account the full economic cycle including both boom and bust periods and shows a 0.24 reduction over the last 22 years from 2.53 in 1991 to 2.29 in 2013.

**Table 1.2.3.3 Change in Average Household Size 1991-2013**

Year	1991	1996	2001	2006	2007	2008	2009	2010	2011	2012	2013
Average Household Size	2.53	2.41	2.32	2.31	2.31	2.31	2.30	2.30	2.30	2.29	2.29

Source: Welsh Government (2013) Household Estimates for Wales

**1.2.3.6** The Welsh Government's deposit representation recommended using an AHS of 2.13 (which is the halfway point between what the 2008 and 2011 projections predicted for 2026, 1.97 and 2.25 respectively). Whilst PBA accepted that this indexed or hybrid approach seeks to reflect both 2008 and 2011 household formation rates, they recommended that a more robust approach would be to take the annual average decrease that has occurred over the 22 year period and extrapolate the downward trend over the Plan period.

**1.2.3.7** Full details on the robustness of all the assumptions used within the model can be found within the Review of Levels of Growth 2015 (PBA)<sup>(11)</sup>.

## ***What are the implications if they are not realistic?***

**1.2.3.8** The assumptions have been founded on a robust evidence base, and on this basis, the Council are confident they are both realistic and deliverable.

**1.2.3.9** In terms of the economic assumptions used, the employment led housing requirement has also been tested against a demographic led housing requirement, which excludes the economic assumptions. This model produces a slightly higher housing requirement of 7,511 compared to 7,481 under the economic model, which suggests the Plan is providing for an appropriate level of housing to meet population growth, as well as achieving the economic aims of the Plan.

**1.2.3.10** The Annual Monitoring Report (AMR) forms the basis on which to assess the effectiveness of the Plan's policies and proposals. Key indicators (core, contextual and local) will be closely monitored throughout the Plan period to ensure the strategy is meeting its intended targets and its proposals are delivered within the anticipated timeframes. If it appears that these targets are not being reached, it will be necessary to deal with this through a partial or full review of the Plan.

## **1.2.4 Question 4**

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

# 1 . Housing Provision (Amount & Distribution)

## **Vacancy Rate**

**1.2.4.1** The term '*vacancy rate*' refers to the proportion of the existing housing stock that is unoccupied at any given point in time. This includes both short term [i.e. people moving house (transactional vacancies)] and longer term vacancies. Hidden households have been taken into consideration within the average household size assumption used within the Economic and Demographic models<sup>(12)</sup>.

**1.2.4.2** The WG has indicated that a notional 1 household: 1.04 dwellings is appropriate in order to allow for changes in vacancy rates, churn in the housing market (i.e. selling / buying houses) and 'hidden' households (i.e. people who previously wished to move but could not and now can). This is, however, not a fixed conversion rate but one which should be based on local circumstances.

**1.2.4.3** It is assumed that the same proportion of new housing provision over the Plan period will be unoccupied at any given point in time as with the current existing housing stock.

**1.2.4.4** The vacancy rate in Neath Port Talbot, over the last 10 years (upto 2014) has averaged at 4.25%. Accordingly a vacancy rate of approximately 4% is deemed appropriate by the Council as it is in line with past trends.

## **Flexibility Allowance**

**1.2.4.5** The term '*flexibility allowance*' refers to the contingency built into the housing land supply to allow for non delivery of sites and unforeseen issues.

**1.2.4.6** The level of housing need has been established at 7,511 housing units over the life of the Plan<sup>(13)</sup>. Accordingly, the Council must as an absolute minimum, make provision for the development of this number of units.

**1.2.4.7** Providing for 7,511 units only, would effectively require every single site identified within the LDP to be delivered at the anticipated time and at the expected rate. Whilst there is confidence that the sites identified for development will indeed be delivered, the complexities of the development process introduce a significant degree of uncertainty as to when sites will be developed and the rate at which new housing will be provided within those sites.

**1.2.4.8** The delivery of individual new housing sites will be influenced by a range of factors related to wider economic and housing market conditions, ownership, access or a broad range of other technical issues. When this is multiplied across all the County Borough then there inevitably will be considerable scope for the delivery of some sites to be delayed and such delays could compromise the strategic aim of meeting the housing need of 7,511 housing units.

12 Table 2.1 & Table 2.5 'Review of Levels of Growth 2015' (Peter Brett Associates) - Document Ref: ED009.

13 As proposed in Section 2.4.1 of the 'Observations on the Focussed Change Representations (January 2015)' - Document Ref: ED008 and 'Review of Levels of Growth 2015 (Peter Brett Associates)' - Document Ref: ED009.

# 1 . Housing Provision (Amount & Distribution)

**1.2.4.9** The WG has indicated that a notional flexibility allowance of 10% may be appropriate to allow for the non delivery of sites and unforeseen issues but it is for the Council to evidence a level of flexibility that is appropriate for the Plan area.

**1.2.4.10** Based upon evidence of previous under delivery within the Neath Port Talbot area, the Council is satisfied that a total flexibility allowance (which includes an allowance for vacancies within the housing stock and for sites not coming forward) of approximately 15% is deemed to be robust, reasonable and appropriate for the Plan area. Further detail is provided within **Appendix A**.

## 1.2.5 Question 5

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

**1.2.5.1** The Phasing & Delivery of New Housing Provision document provides an updated position with regard to the expected availability of land for a rolling 5 year period up to 2020/21<sup>(14)</sup>.

**1.2.5.2** The following table indicates the expected availability of units for each 5 year period within the housing trajectory to be delivered either on 'greenfield' sites or through the development of previously developed ('brownfield') land <sup>(15)</sup>.

**Table 1.2.5.1 Availability Of Units - Greenfield / Brownfield**

Year End	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21
5 Year Period	2015-2020	2016-2021	2017-2022	2018-2023	2019-2024	2020-2025	2021-2026
Available Land	2,694	2,869	2,967	2,959	2,875	2,768	2,625
'Greenfield'	999	1,049	1,027	1,014	979	888	759
%	37%	37%	35%	34%	34%	32%	29%
'Brownfield'	1,695	1,820	1,940	1,945	1,896	1,880	1,866
%	63%	63%	65%	66%	66%	68%	71%

14 Table 1 (Page 8) Phasing & Delivery of New Housing Provision (January 2015) - Document Ref: ED010.

15 This is to address Key Issue 14 - 'There are significant areas of brownfield (previously developed) land requiring remediation and regeneration'.

# 1 . Housing Provision (Amount & Distribution)

**1.2.5.3** The table illustrates an emphasis on the reuse of previously developed land, a trend that strengthens as the Plan period progresses.

## 1.2.6 Question 6

**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?**

**1.2.6.1** The proposed number of units identified for each site within Policy H1 (Housing Sites) is indicative and has either been based on details contained in a planning application or development brief, or where no details have been provided, the numbers represent the Council's assessment of an appropriate number of units, based on:

- 35 dwellings per hectare (dph) in the Coastal Corridor; and
- 30 dph in the Valleys.

**1.2.6.2** Sites located in the most sustainable locations, near to transport nodes and a wide range of facilities where trips by foot, bicycle and public transport are easily accessible, have been identified as sites where a higher density of development (i.e. 40dph) is likely to be appropriate.

**1.2.6.3** Further detail and justification for the densities applied are set out within the Population & Housing Topic Paper<sup>(16)</sup> and Affordable Housing Topic Paper<sup>(17)</sup> respectively.

## 1.2.7 Question 7

**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?**

**1.2.7.1** The 'Implementation Plan'<sup>(18)</sup> and the 'Strategic Housing Site Assessment Report'<sup>(19)</sup> provide information regarding the issues and constraints that will likely influence the timing of delivery of new housing on a site-by-site basis.

**1.2.7.2** The Phasing & Delivery of New Housing Provision<sup>(20)</sup> provides an updated position and also demonstrates that there will be a 5 year supply of land throughout the Plan period.

16 Paragraphs 4.2.66-4.2.81 (Page 59) Population & Housing Topic Paper - Document Ref: SD41.

17 Paragraphs 4.2.30-4.2.35 (Page 23) Affordable Housing Topic Paper - Document Ref: SD42.

18 Document Ref: EB23.

19 Document Ref: EB06.

20 Document Ref: EB010.

# 1 . Housing Provision (Amount & Distribution)

## 1.2.8 Question 8

**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?**

**1.2.8.1** The 'Implementation Plan'<sup>(21)</sup> and the 'Strategic Housing Site Assessment Report'<sup>(22)</sup> provide information regarding the issues and constraints that will likely influence the timing of delivery of new housing on a site-by-site basis.

**1.2.8.2** The 'Phasing & Delivery of New Housing Provision'<sup>(23)</sup> provides a site schedule which indicates when all the sites identified within Policy H1, including the landbank sites, are likely to be brought forward for development.

**1.2.8.3** Whilst not all of the landbank sites are included within the expected 5 year supply immediately following the anticipated adoption of the LDP, it is expected that all the sites identified in Policy H1 will be delivered during the Plan period.

**1.2.8.4** Whilst some sites are currently delivering new housing, others will be phased over a longer timeframe.

## 1.2.9 Question 9

**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?**

### **Windfall Sites**

**1.2.9.1** The Population & Housing Topic Paper (September 2014) considered the rate of new housing delivery through the development of windfall sites over the period since 2001<sup>(24)</sup>. Windfall sites were defined within this paper as '*...sites that had not been allocated for development in any development plan at the point of actual housing delivery*'.

**1.2.9.2** The evidence presented indicated that over the period since 2001 an average of 54 units were provided per annum<sup>(25)</sup>. This period of time coincided with the base date of the Unitary Development Plan (UDP) and the table illustrates how during the early years of a plan period windfall development can be lower relative to later years. It is common,

21 Document Ref: EB23.

22 Document Ref: EB06.

23 Document Ref: ED010.

24 Section 9.3 'Population & Housing Topic Paper' - Document Ref: SD41.

25 Table 9.6 (Page 86) 'Population & Housing Topic Paper' - Document Ref: SD41.

# 1 . Housing Provision (Amount & Distribution)

for example, for an emerging development plan to subsequently include windfall sites as specific site allocations. This can have the effect of apparently reducing the contribution of windfall sites when applying the definition highlighted above.

**1.2.9.3** A degree of caution is appropriate therefore when considering windfall contributions early in any plan period. The Phasing & Delivery of New Housing Provision (January 2015) document indicated that since the beginning of the LDP period, new housing had been developed on other large sites that have not been included within the LDP as specific site allocations<sup>(26)</sup>.

**1.2.9.4** The following table indicated the level of provision on these sites:

**Table 1.2.9.1 Actual Completions - Other Large Sites**

Year	2011/12	2012/13	2013/14
Completions	18	1	2

**1.2.9.5** The completed housing units referred to in the above table can be said to have been delivered on windfall sites. Whilst the number of completions outlined above could be considered to be modest, it can be seen that the numbers are consistent with the windfall delivery during the early years of the UDP<sup>(27)</sup>.

**1.2.9.6** These annual totals recorded since the start of the LDP period therefore represent a significant underestimation of the actual level of windfall delivery since the beginning of the Plan period. Table 1.2.9.1 does not present a true reflection of the scale of windfall site emergence and subsequent delivery over this period of time.

**1.2.9.7** An alternative approach to assessing the delivery of windfall sites focuses attention on the status of new housing sites at the point in time they were initially the subject of a formal planning application. In this context, windfall sites can be defined as *'...sites that have a capacity of 10 or more units that were not allocated for residential development in any development plan when the initial planning application was first submitted for approval'*. Such sites have therefore emerged outside of the development plan system.

**1.2.9.8** It is still the case that some sites can subsequently be incorporated into an emerging development plan and be allocated for development by means of a specific development plan policy. Nevertheless, despite being promoted for development in this way, the emergence of these sites took place independent of the development plan and hence would be categorised as having 'windfall' status if not for the LDP process.

**1.2.9.9** The following table provides an indication of the sites identified within Policy H1 of the LDP which meet the above criteria of windfall status:

26 Table 1 / Row E (Page 8) 'Phasing & Delivery of New Housing Provision' - Document Ref: ED010.  
27 As evidenced in Table 9.6 (Page 86) 'Population & Housing Topic Paper' - Document Ref: SD41.

# 1 . Housing Provision (Amount & Distribution)

**Table 1.2.9.2 Policy H1 Sites - Windfall Status**

Site	LDP Reference	2011/12	2012/13	2013/14	2014/15
Area 1, Coed Darcy	H1/LB/4	17			10
86-100, Briton Ferry Road	H1/LB/8		25		
The Ropewalk	H1/LB/9			12	
Cardonnel Road	H1/LB/11				16
Forest Lodge Lane	H1/LB/19		2		
Station Road	H1/LB/21	14			
Talbot Road	H1/LB/22			46	
Dyffryn Road	H1/LB/23	14			
Maes Marchog	H1/LB/24		16		
Ynys Y Nos Avenue	H1/LB/29	5		9	2
Former Cwmtawe School	H1/LB/31		16	5	12
<b>Total:</b>		<b>50</b>	<b>59</b>	<b>72</b>	<b>40</b>

**1.2.9.10** The table above provides a truer reflection of the actual rate at which windfall sites have emerged and been developed in recent years within Neath Port Talbot. It indicates the actual level of new housing provision through the development of windfall sites during the first 3 years of the Plan period together with an indication of the likely provision on the sites in question during 2014/15 for comparison purposes.

**1.2.9.11** Additionally the likely completions figure for 2014/15 will be supplemented by a site of 12 units that has been completed during late 2014 by a registered social landlord. A number of other sites have either recently received planning permission or are awaiting a determination following the submission of a planning application indicating the likely rate of delivery on windfall sites in the short term from 2015/16 will be consistent with the scale of the overall windfall allowance. On this basis, the Council maintains that the windfall allowance is appropriate and realistic.

## **Small Sites**

**1.2.9.12** The following table indicates the number of new housing units delivered since the beginning of the Plan period through the development of small sites:

**Table 1.2.9.3 Small Site Completions**

Year	2011/12	2012/13	2013/14
Completions	31	44	39

## 1 . Housing Provision (Amount & Distribution)

**1.2.9.13** The Population & Housing Topic Paper noted that the Settlement Review process<sup>(28)</sup> had identified substantial scope for small site development within settlement limits and also that the rate of small site development can fluctuate on a year-by-year basis<sup>(29)</sup>.

**1.2.9.14** In this context, the Council is satisfied that the small site allowance within the LDP is appropriate and realistic.

---

28 Table 9.23 (Page 99) Population & Housing Topic Paper - Document Ref: SD41.

29 Table 9.18 (Page 95) Population & Housing Topic Paper - Document Ref: SD41.

# 1 . Housing Provision (Amount & Distribution)

## 1.3 Distribution

### 1.3.1 Question 10

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

**1.3.1.1** Early in the Plan preparation process, at the same time as considering the wider spatial distribution options<sup>(30)</sup>, the Council consulted on the alternatives for the distribution of growth within Neath, Port Talbot and the Valleys respectively<sup>(31)</sup>.

**1.3.1.2** For the purposes of consultation the following area-based spatial strategy alternatives were put forward:

- **Neath** - to deliver growth either through (1) a major new community at Aberdulais; or (2) a major northern extension to Bryncoch; or (3) the release of a number of sites to disperse growth around the urban area.
- **Port Talbot** - to deliver growth either through (1) a major extension to Coed Hirwaun; or (2) the release of a number of sites to disperse growth around the urban area.
- **Valleys** - to deliver growth in Pontardawe (i.e. Rhos, Alltwen or Rhydyfro) and Glynneath, identifying such areas as key growth points.

**1.3.1.3** In regard to the Coastal Corridor, the overwhelming response supported the release of a number of sites to disperse the growth around the urban areas, thereby spreading the benefits and dis-benefits of development over the widest possible area. Furthermore, there was broad support for the approach to identify Pontardawe and Glynneath as growth points in the valleys.

**1.3.1.4** In parallel, the area-based spatial strategy alternatives were assessed in detail as part of the Sustainability Appraisal (SA). Details of these assessments are set out in the Stage 2 SA<sup>(32)</sup> and Pre-Deposit Plan<sup>(33)</sup>.

**1.3.1.5** In regard to the selection of the allocated sites and the justification for the decisions taken between the competing alternatives, this is set out in the Settlement Topic Paper<sup>(34)</sup>, Candidate Site Assessment Report<sup>(35)</sup> and Strategic Housing Site Assessment

30 Refer to Question 7 - Matter 2 Plan Preparation: Growth & Spatial Strategies, Overarching and Area Based Policies.

31 More detailed information is presented in Section 2.3 & Appendix A of the LDP Consultation Report Volume 2: Pre-Deposit Consultation (Regulation 14 & 15) - Document Ref: SD11.

32 Section 7.4.4 Stage 2: Sustainability Appraisal - LDP Pre-Deposit Plan Interim Report - Document Ref: LDP34.

33 Appendix C Pre-Deposit Local Development Plan - Document Ref: LDP32.

34 Document Ref: SD40.

35 Document Ref: EB07.

# 1 . Housing Provision (Amount & Distribution)

Report<sup>(36)</sup>. Consequently, the Council is satisfied that the decisions taken concerning the competing alternatives have been clearly set out throughout the Plan preparation process and in the submitted evidence base.

## 1.3.2 Question 11

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

**1.3.2.1** In order to ensure that land allocated in the LDP is capable of development and can contribute to the delivery of the Strategy, sites have undergone stringent assessments to determine their 'suitability' and 'deliverability' over the Plan period. In preparing the LDP, the Council has taken a significant number of sites into consideration, including those sites submitted as Candidate Sites and those Unitary Development Plan (UDP) allocations that currently remain undeveloped which do not have a 'live' planning permission.

**1.3.2.2** Whilst the assessment was not designed to produce detailed technical information on a site by site basis, the process simply provided a comprehensive overview of the development potential of sites and was based on the best available information at the time of Plan preparation.

**1.3.2.3** The methodology applied to the assessment of Candidate Sites had the following stages<sup>(37)</sup>:

- **Stage 1(a): European Designated Sites** - filtered out any site that was located within a European Designation (e.g. Special Area of Conservation (SAC); Ramsar Site);
- **Stage 1(b): Small Sites** - filtered out sites that were considered too small to be considered as a 'potential' allocation in the LDP;
- **Stage 2: Initial Planning Assessment** - filtered out sites that were not considered suitable in planning terms for the proposed use;
- **Stage 3: Consultee Assessment / Compatibility with Strategy** - on the basis of consultee assessment, consideration was given to whether the site was suitable for development in full or in part and whether it was compatible with the overall Strategy. Those sites that were no longer considered to be suitable or deliverable were filtered out; and
- **Stage 4: Detailed Assessment** - further detailed assessment was undertaken on those sites that were deemed suitable for further consideration in order to determine whether they were appropriate to include as allocations in the LDP.

36 Document Ref: EB06.

37 Full details are set out in Chapter 3 'LDP Candidate Site Assessment Report - Document Ref: EB07.

# 1 . Housing Provision (Amount & Distribution)

**1.3.2.4** The assessment of those sites that reached Stage 4 of the methodology included a range of questions under the categories of strategy, landscape, environmental impacts, highways, infrastructure and deliverability / viability<sup>(38)</sup>. Furthermore, as part of the overall assessment of the sites, a summary of, and responses to, the various site specific comments that the Council received during the various stages of consultation were also included. The sites were also assessed against the Sustainability Appraisal (SA) objectives<sup>(39)</sup>.

**1.3.2.5** The Council is satisfied that the combination of the 'Candidate Site Assessment Report'<sup>(40)</sup> and 'Strategic Housing Site Assessment Report'<sup>(41)</sup>, clearly sets out how the various alternatives measured up to the selection criteria ultimately providing the justification for the housing allocations in the LDP.

## 1.3.3 Question 12

**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?**

**1.3.3.1** The Council maintains that the Deposit Plan includes sufficient flexibility to meet the future needs of communities over the Plan period both in respect of the overall level of housing supply and the range of sites identified that vary in terms of their size, scale, site characteristics and spatial distribution.

**1.3.3.2** The overall housing provision allows for an appropriate balance to be achieved between development in the Coastal Corridor and the Valleys Strategy Areas. Additionally, within the Coastal Corridor the LDP housing provision achieves a balance between the Port Talbot and Neath areas.

**1.3.3.3** The Council has taken the opportunity to optimise the allocation of brownfield land where possible and the overall housing supply is therefore made up of brownfield redevelopment, greenfield sites and existing commitments.

## 1.3.4 Question 13

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

38 Table 3.1 (Page 8) 'Strategic Housing Site Assessment' - Document Ref: EB06.

39 Section 3.3 (Page 12) 'Strategic Housing Site Assessment' - Document Ref: EB06.

40 Document Ref: EB07.

41 Document Ref: EB06.

# 1 . Housing Provision (Amount & Distribution)

**1.3.4.1** The Population & Housing Topic Paper<sup>(42)</sup> considered the matter of the historic rate of new housing delivery through the development of small sites. Many such sites have been developed on a self-build basis, and it is expected that this trend will continue over the life of the LDP.

**1.3.4.2** The Topic Paper also addressed the potential future delivery of small housing sites by considering the scope for future development of this nature. The Council has therefore recognised the role that small scale housing development and self-build schemes can make towards meeting the overall housing need.

**1.3.4.3** The housing requirement within the Deposit Plan makes an appropriate provision for both site specific allocations and the small sites allowance. This small site allowance is not to be viewed as an absolute limit but as an estimation in the context of both previous development trends and the settlement limits within the Deposit Plan of the likely rate of provision. The Council is confident that sufficient capacity has been included within identified settlement limits to allow for self-builders to realise their ambitions.

**1.3.4.4** Consequently, the Council does not consider that a specific policy to encourage self-build schemes is warranted.

## 1.3.5 Question 14

### Are there sufficient housing allocations in the Valley Strategy Area?

**1.3.5.1** The Deposit Plan<sup>(43)</sup> sets out the economic-led approach taken to the growth and spatial strategies and summarises the challenges facing the Valleys strategy area. Bearing in mind the need to ensure that Plan allocations are viable and deliverable, the number and size of allocations are considered to be realistic and proportionate. By concentrating allocations in the identified Strategic Growth Areas, and the implementation of the flexible approach elsewhere, it is intended to maximise the economic potential of the area in a sustainable and effective way while making best use of the assets of the area.

**1.3.5.2** The identification of a 'settlement hierarchy' has been used to provide a balanced approach to managing growth, directing development to areas reflecting the attributes contained within that community and their ability to accommodate growth<sup>(44)</sup>. The Council considers the approach to be robust, proportionate, appropriate and deliverable within the existing social and economic context of the area.

42 Section 9.4 'Population & Housing Topic Paper' - Document Ref: SD41.

43 Chapter 2 The Strategy - Document Ref: SD04.

44 Full details are set out in the 'Settlement Topic Paper' - Document Ref: SD40.

## 1 . Housing Provision (Amount & Distribution)

**1.3.5.3** Detailed analysis of new housing provision on large housing sites since the beginning of the Unitary Development Plan (2001) to the beginning of the Local Development Plan (2011) has shown the Valleys Strategy Area delivered fewer housing units than the Coastal Corridor Strategy Area. This is to be expected given that the majority of the population of the County Borough resides within the Coastal Corridor.

**1.3.5.4** The following table illustrates the level of new housing completion between 2001 and 2011:

**Table 1.3.5.1 Level of Large Site Housing Completions (2001-2011)**

	Completions (Large Sites)	Proportion (%)
Coastal Corridor Strategy Area	2,352	87%
Valleys Strategy Area	352	13%
<b>Total:</b>	<b>2,704</b>	<b>100%</b>

**1.3.5.5** It is expected that the Valleys Strategy Area will make a more significant contribution over the LDP period, as illustrated in the following table:

**Table 1.3.5.2 Expected Level of Large Site Housing Completions (2011-2026)**

	LDP Policy H1	Proportion (%)
Coastal Corridor Strategy Area	5,690	82%
Valleys Strategy Area	1,275	18%
<b>Total:</b>	<b>6,965</b>	<b>100%</b>

**1.3.5.6** The Council is therefore confident that the strategy that underpins the spatial distribution of locations identified for proposed development, represents the most appropriate and effective mechanism for meeting the level of need. In this context, it is considered that an appropriate balance has been achieved between the two strategy areas and that sufficient housing allocations have been identified within the Valleys Strategy Area.

# 1 . Housing Provision (Amount & Distribution)

## 1.4 Open Space

### 1.4.1 Question 15

**Why is greenspace<sup>(45)</sup> 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*?<sup>(46)</sup> Should Policy OS 1 be amended to include reference to the accessible greenspace standards?**

***Why is greenspace not covered by the LDP Open Space Assessment / Is the LDP consistent with PPW & TAN16?***

**1.4.1.1** In respect of national policy guidance, TAN 16 states '*Open Space Assessments should address all forms of open space*' and presents a typology of categories of open space which '*...is put forward as a useful basis for preparing such assessments*'. Consequently, the Council has not interpreted this typology to be a prescriptive list, moreover it has been used as a useful starting point on which to establish the scope of the Open Space Assessment important within the local context.

**1.4.1.2** Covering an area of over 44,217 hectares, the County Borough is predominantly rural and characterised by an upland area dissected by the valleys of the Afan, Neath, Dulais and Tawe rivers each of which is separated by ridges of high forest or moorland. Against this backdrop, the valleys are also rural in aspect and contain scattered, elongated communities throughout. The main centres of population are confined to a narrow coastal strip which extends around Swansea Bay<sup>(47)</sup>.

**1.4.1.3** As a consequence, a significant portion of the population across the County Borough has easy access to a range of natural and semi-natural greenspace (i.e. including woodland, forestry, scrub, grasslands, open access land, wetlands and coastal land) and also areas of open countryside.

**1.4.1.4** Furthermore, to inform Plan preparation an extensive programme of community involvement and consultation has been undertaken to establish the key issues and challenges currently facing the area. This led to the identification of a number of specific key issues which the LDP seeks to address. Whilst the community engagement did not highlight any issues in respect of accessibility to natural greenspace, comments were raised in relation to the level of provision of the more formal categories of open space.

45 EB13 Page 1 - Footnote 1

46 TAN 16 Paragraphs 2.5 & 3.1-3.5

47 The physical characteristics of the County Borough is illustrated in Map 1.2 'Topography and Main Settlements of Neath Port Talbot' (Page 3) of the Deposit Local Development Plan - Document Ref: SD04.

# 1 . Housing Provision (Amount & Distribution)

**1.4.1.5** Accordingly, when taking account of (1) the characteristics of the County Borough; and (2) the feedback gained from the programme of community involvement and the need to address the key issues identified<sup>(48)</sup>, the Council applied what was considered to be a pragmatic and focussed approach to the assessment of open space.

**1.4.1.6** As a consequence, the scope of the assessment considered all the categories of open space within the typology, with the exception of (ii) natural and semi-natural greenspace, (viii) cemeteries and churchyards and (ix) accessible areas of countryside in the urban fringe. Notwithstanding this point however, the Open Space & Indoor Leisure Topic Paper briefly references the current situation with regard to Country Parks, green corridors, natural & semi-natural greenspace and the coast<sup>(49)</sup>.

**1.4.1.7** The Council is therefore satisfied that the evidence and assessment that underpins the policy approach as set out in the Deposit Plan, is in accordance and consistent with the guidance set out in PPW and TAN16.

## ***Should Policy OS1 reference 'accessible greenspace standards'?***

**1.4.1.8** Although not a requirement on Local Planning Authorities (LPAs) to use such guidance, the Council acknowledges that the former Countryside Council for Wales (CCW) produced a practical guide for the assessment of accessible natural greenspace in towns and cities, recommending a variety of standards that LPAs may wish to use to address their own needs and circumstances<sup>(50)</sup>. For the reasons outlined above however, the Council has not undertaken or incorporated such an assessment of 'Accessible Natural Greenspace'. On this basis, the Council does not consider it appropriate to reference the standards as recommended by CCW in Policy OS1.

**1.4.1.9** The Council is however satisfied that Policy OS1, in referencing a standard for informal open space, can where relevant help to deliver through careful design and planning a more naturalistic space (akin to 'accessible natural greenspace') which will benefit the health and wellbeing of the community. The intention of the Council is to prepare Supplementary Planning Guidance which will identify areas / wards where this type of informal space will be a priority<sup>(51)</sup>.

## **1.4.2 Question 16**

**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?**

### ***How has the threshold been defined?***

48 Including KI 8 'There is a shortfall in the provision of open space in some communities' (Page 11) Deposit Local Development Plan - Document Ref: SD04.

49 Paragraphs 4.0.41-4.0.54 'Open Space & Indoor Leisure Topic Paper' - Document Ref: SD44.

50 'Providing Accessible Natural Greenspace in Town and Cities' (Countryside Council for Wales 2006).

51 Table 7.1 (Page 119) Deposit Local Development Plan - Document Ref: SD04.

# 1 . Housing Provision (Amount & Distribution)

**1.4.2.1** The threshold of 3 or more dwellings was defined following consultation with the Council's Development Management team. It was considered that on balance, it would be unreasonable to expect development of one or two dwellings to contribute to open space provision. Furthermore, the threshold is consistent with that set out in Policy AH1 (Affordable Housing).

## ***What level of open space provision will be generated?***

**1.4.2.2** It is difficult at this stage to quantify the level of new open space provision that will be generated by Policy OS1. Notwithstanding this point, the policy will ensure that planning obligations will be sought where a shortfall in open space provision has been identified.

**1.4.2.3** Whilst Policy OS1 will require proposals that meet the development threshold to meet the additional demand arising from the proposed development, it will not be applied to alleviate any existing open space shortage. Where there are multiple deficiencies, an assessment will need to be made as to which categories will be prioritised. Consequently, the level of open space provision generated will depend on the size, type / mix and distribution of residential proposals that come forward.

**1.4.2.4** The Open Space Assessment<sup>(52)</sup> identifies the existing shortfalls in the various categories<sup>(53)</sup> and it is expected that this document will provide the basis for planning obligation negotiations. Discussions at the pre-application stage will establish the level of need and the potential impact of the proposed development across the range of open space categories. More information on the standards applied and the basis for the calculations in respect of open space provision is set out in the Planning Obligations Supplementary Planning Guidance<sup>(54)</sup>.

**1.4.2.5** Furthermore, the Deposit Plan (Table 6.2), supported by the 'Monitoring Framework Supplementary Paper'<sup>(55)</sup>, sets out the framework through which an ongoing assessment will be made of the impact of policies at the local and wider level and whether policies and related targets have been met or progress is being made towards meeting them.

## ***Where will it be located?***

**1.4.2.6** The requirements arising from each development proposal will be considered on a site-by-site basis. The Council will seek to negotiate with the developer either (1) on-site provision that is fully integrated and accessible within the design and layout of the scheme, or (2) a contribution to off-site provision. In circumstances where adequate open space provision exists in the vicinity of a development but requires enhancement or has poor accessibility, a contribution may be sought for any necessary improvements.

52 Document Ref: EB13.

53 The Open Space Assessment presents by Spatial Area and Electoral Ward the shortfalls by open space category.

54 Section 5.6 (Page 21) 'Planning Obligations Supplementary Planning Guidance (DRAFT - September 2014)' - Document Ref: SD33.

55 Document Ref: EB24.

## 1 . Housing Provision (Amount & Distribution)

**1.4.2.7** Further detail on the approach to be taken in relation to open space provision will be set out in Supplementary Planning Guidance<sup>(56)</sup>.

### 1.4.3 Question 17

**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?**

**1.4.3.1** The types of open space referenced in Paragraph 5.1.53 is not intended to be an exhaustive list, rather to give an indication of what open space typically refers to. The Council confirms that Policy OS2 (Protection of Existing Open Space) and the supporting text (Paragraph 5.1.61) seeks to protect all areas of open space, including greenspace.

**1.4.3.2** For clarity however, on reflection the Council considers that it would be appropriate to include a reference to 'greenspace' in both paragraph 5.1.53 and in the definition provided in the Glossary, and if deemed necessary by the Inspectors, this could be addressed via a Matters Arising Change.

### A Appendix - Flexibility Allowance

**A.0.1** In considering the most appropriate level of flexibility to apply, any assessment should have regard to the current adopted development plan. In the case of Neath Port Talbot, this is the Unitary Development Plan (UDP) adopted in 2008. The UDP covers the period 2001 to 2016.

**A.0.2** The UDP included a housing provision of 6,150 units over the Plan period. The Council maintained that this number included a level of over-provision to provide an appropriate level of flexibility of delivery throughout the UDP period.

**A.0.3** The Inspector appointed by the Welsh Assembly Government to hold a Public Inquiry into the UDP, concluded that there was no need for any further allowance (such as a flexibility allowance) to be built into the housing supply of 6,150 units.

**A.0.4** The following table illustrates the scale of new housing provision since 2001 relative to the original UDP housing requirement:

**Table A.0.1 Actual Scale of New Housing Since 2001**

	Housing Units	
Total UDP Housing Provision 2001-2016	6,150	
Annual Housing Requirement	410	
UDP Housing Requirement 2001-2014 (13 Years)	5,330	100 %
Completions 2001-2014	4,238	79.5%
Delivery Shortfall	1,092	20.5%

**A.0.5** It is important to note that the recession has had a significant impact locally, as it has nationally, on the level of provision of new housing. Any assessment of the true level of flexibility built into the UDP housing requirement therefore needs to take account of the impacts of the recession.

**A.0.6** It is undoubtedly the case that had the recession not occurred or been so profound in terms of its length and severity, then the number of residential units provided thus far into the UDP period would have been considerably in excess of the actual number of 4,238 delivered thus far.

**A.0.7** The impact of the economic downturn on build rates can be illustrated as follows:

## A . Appendix - Flexibility Allowance

**Table A.0.2 Impact of the Recession on Build Rates**

Period	Years	Housing Units	Average
April 2001-March 2007	6	2,082	347
April 2007-March 2014	7	2,156	308

**A.0.8** Hence the period of economic uncertainty has seen new housing provision decline by 11% from the pre-recession average. The following table indicates what might have happened to the rate of new housebuilding within Neath Port Talbot had the recession not occurred. It illustrates the possible level of performance relative to the UDP, with the impact of the recession discounted and with pre-recession trends extrapolated to the present day:

**Table A.0.3 Potential Scale of New Housing Since 2001 - Without Recession**

	Housing Units	
Total UDP Housing Provision 2001-2016	6,150	
Annual Housing Requirement	410	
UDP Housing Requirement 2001-2014 (13 Years)	5,330	100 %
Completions 2001-2007 (6 Years)	2,082	
Average Annual build Rate	347	
Completion 2001-2014 (Trend extrapolation: 13 x 347)	4,511	84.6%
Delivery Shortfall	819	15.4%

**A.0.9** In applying this methodology, it can be seen that the UDP housing requirement included a total level of over provision of 15% which allowed for an appropriate degree of flexibility of delivery and other matters such as the need to account for vacancies within the housing stock.





Local Development Plan  
Cynllun Datblygu Lleol



Neath Port Talbot  
Castell-nedd Port Talbot  
County Borough Council Cyngor Bwrdeistref Sirol



[www.npt.gov.uk/ldp](http://www.npt.gov.uk/ldp)

March 2015