

**WELSH GOVERNMENT**  
**Examination Hearing**  
**Statement**

**Neath Port Talbot Local Development Plan**

**Session 10 – Economy**

**(Matter 6)**

**13 April 2015**

## Matter 6: Economy

**Key Issue:** Do the overall scale, type and distribution of the allocated employment and retail sites achieve the relevant objectives of the LDP in a sustainable manner consistent with the WSP and national policy?

As highlighted in our previous statements to Matter 2: Plan Preparation and Matter 3: Housing Provision, **the Welsh Government is generally supportive of the economic-led growth strategy** that seeks to increase the resident labour force through the creation of job opportunities and homes. Policy SP11 in the Deposit Plan allocates 96ha of employment land, of which 32ha is expected to be developed over the Plan period.

Paragraph 2.4.3.12 of the 'Council's Observations on the Focussed Change Representations' explains how the employment requirement of 32ha is calculated which includes 11.4ha land-take for waste. **The Council should explain why the employment requirement remains inclusive of a waste allowance when this no longer accords with TAN 21 and was proposed for deletion during the Focussed Change consultation.** Removing the land-take for waste will leave a B-space requirement of 13.76ha if the Council's alternative plot ratio of 0.25ha is used. Whilst the WG supports an increase above the 8.6ha requirement in the PBA Study (2012) to allow for flexibility, competition and choice, **the Council should clarify how the employment requirement of 13.76ha aligns with an over-provision of approximately 82ha in the Deposit Plan.** The authority should explain this relationship, including what the implications would be on jobs and homes if land take were to exceed 13.76ha in the plan period.

**Have relevant alternatives been considered and is the identification of the allocated sites based on a robust and rational site selection process?**

This is for the authority to answer.

**Are the policies for employment, retail and tourism development clear, reasonable and appropriate?**

This is for the authority to answer.

The Council's employment policies in Section 5 of the Deposit Plan are generally supported in accordance with paragraph 7.5.1 of Planning Policy Wales (PPW). Please see the WG statement on Matter 2: Plan Preparation, in respect of the role and function of settlements. We note this is subject to an action point. It is considered that clarification in respect of the relationship between dormitory settlements and Policy EC5: Employment Uses in the Valleys and EC6: Live-work units would be helpful.

## Employment

**How great is the over-provision of employment land? Is this significant and will it have a detrimental impact on the Council's economic strategy, particularly in terms of land values, future growth, job numbers?**

Policy SP11 allocates 96ha of employment land, of which 32ha is projected to be developed over the plan period. The difference between the Council's employment provision and the anticipated delivery rate is highlighted in Policy EC1, where 64ha of employment land allocated on Baglan Bay is earmarked for the development of non B-Class uses, specifically in the energy sector. **The total employment allocation in Policy SP11 is approximately 87ha above the 8.6ha requirement evidenced in paragraph 5.5.7 of the PBA Report (2012).** The Council should clarify this over-provision and misalignment with the evidence base.

The Council have examined the local requirement for industrial land and considered the industry standard ratio of 0.4 is inappropriate for the development of industrial land in Neath Port Talbot (NPT). The PBA Study (2012) acknowledges that this ratio "is reasonable for most industrial and warehouse sites, but for office densities it maybe considerably higher" (Economy and Employment Topic Paper, 2013, paragraph 4.2.7). The Council should explain why the industry standard of 0.4 is inappropriate for NPT and how a reduced plot ratio of 0.25 will align with the demand for 3ha of office development in Table 5.7 of the PBA Study (2012).

The lower plot ratio of 0.25 increases the B-space requirement in the PBA Report (2012) from 8.6ha to 13.76ha. In accordance with paragraph 4.5.2 of TAN 23, the WG supports the additional flexibility, competition and choice, but **requires clarification on how any increased land-take over the plan period would impact on jobs and homes.**

In the Council's calculation of its employment requirement (Observations on the Focussed Change Representations, paragraph 2.4.3.12), stock losses have been omitted. Using a plot ratio of 0.25, the Council equates stock losses to around 17ha of employment land since the 2010 base date of the PBA Study (Economy and Employment Topic Paper, 2013, paragraph 4.2.11). **The Council should explain how stock losses have been accounted for in the employment requirement and clarify what B-class requirement is necessary to deliver on the authority's aspiration for economic growth.**

**Will the employment allocations be sufficient, in terms of the range of types, location and distribution, to provide for the growth proposed?**

The WG supports the range of employment sites listed in Policy EC1 to deliver on the projected B-space requirement over the plan period. B1 office space is estimated to increase by 3ha over the Plan period "because the office sector is not where the local drivers for growth appear to be" (PBA, 2012, paragraph 5.4.33). Subsequently, the Council should explain why all employment allocations make provision for B1 uses totalling in excess of 15ha.

In accordance with Policy EC1, almost 80% of the Council's employment provision is allocated at Baglan Bay. The employment allocation forms part of a larger area that was allocated and successfully developed (in part) within the UDP. Of the 113ha

that has already been developed, the remaining area of 75ha is allocated for employment uses in Policy EC1; 11ha of the site is allocated for B-Class uses, whilst the remaining 64ha will meet the needs of the energy sector whilst providing ancillary services and facilities. Given the successful development of 113ha of the site, **the WG requires clarification on the potential market demand that could drive B-class development in excess of 11ha, and any consequent implications on jobs and homes.**

Indeed, the Baglan Bay Masterplan identifies a zoned approach to development. Both Area 1 and Area 2 are proposed for B-class development, the combined total of which is greater than the 11ha allocated for employment in the LDP. The Council should explain this misalignment with the evidence base and clarify the scale of B-class development proposed.

The redevelopment of Baglan Bay is a long term aspiration that will meet the employment needs of the County Borough beyond the plan period. Notwithstanding the master planning exercise that identifies three areas, with each having a principal target use or sector, we note that the Council maintains the site cannot be readily subdivided to identify the 11ha of B-class land. Subsequently, the entire 75ha site is allocated as a strategic employment site on the Proposals Map; 63ha of which is not proposed for B-class development, but energy sector uses, over the plan period. **The Council should explain how this aligns with paragraph 7.3.4 of the LDP Manual (2006), which states that land should not be allocated on the Proposals Map outside the plan period.** Indeed, if the masterplan identifies land for B-space employment, further clarification is sought on why the 11ha of B-class land cannot be identified and annotated accordingly on the Proposals Map.

The WG considers it vital that the monitoring framework includes an appropriate indicator with key triggers and action points to effectively monitor the take-up of employment land on Baglan Bay. **The Welsh Government is prepared to work with the authority to improve the framework.**

**What evidence is there that the consequences of flood risk at some sites can be acceptably managed?**

WG notes the action point arising from Session 2 (Plan Preparation) on flood risk at Harbourside Strategic Regeneration Area and reserves the right to comment further when additional information is submitted to the examination.

All allocations in the LDP must comply with TAN 15: Development and Flood Risk. The Council will need to ensure all allocations subject to flood risk are deliverable within the plan period.

**Is the importance of the Port Talbot Docks to the economy recognised within the LDP? Does it give sufficient support to the continuation of dock operations? Should other uses be encouraged and, if so, which types might be compatible with dock operations and otherwise appropriate?**

This is for the authority to answer.

Given the importance of Port Talbot Docks to the operation of the steelworks, the Council should explain why the site is omitted from Policy EC2: Existing Employment Areas, which safeguards existing employment sites from alternative uses. If additional policy control is required for the operation of the docks, this should be considered against a separate safeguarding policy in the plan.

**Why aren't existing UDP sites, for example J38, Margam, fully allocated?**

This is for the authority to answer.

**Which LDP policies would be most relevant to proposals at the Science and Innovation Campus? Could additional uses be permitted there and, if so, which should these be? Alternatively, could a variety of development be permitted by including the site within the settlement limit?**

This is for the authority to answer.

**Will the policy framework adequately protect the Tata steel site and allow for its future development? Does it provide sufficient clarity on the planning position for the works? Will it enable development proposals to be determined quickly and consistently?**

This is for the authority to answer.

**Are the policies clear on whether ancillary facilities and services will be permitted on employment sites?**

This is for the authority to answer.