



Cyngor Castell-nedd Port Talbot
Neath Port Talbot Council

Replacement Local Development Plan

2023-2038

Population and Housing Topic Paper

December 2024



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1. Introduction

1.0.1 Neath Port Talbot Council is preparing a Replacement Local Development Plan (RLDP). When adopted, it will provide a revised and updated policy framework to guide development in Neath Port Talbot (NPT) and inform decisions taken by the Council. During the preparation of the RLDP, the existing Local Development Plan (LDP) (adopted January 2016) will remain in place until it expires on the 31st December 2026.

1.0.2 This paper is one of a range of papers prepared to offer more information and to set out the approach taken in the RLDP Preferred Strategy document in relation to different topics and issues affecting the County Borough. It will explain the background which has helped to identify the key issues, objectives, strategy and strategic policies for the RLDP.

1.0.3 This Population and Housing Topic Background Paper has been produced in 2024 to reflect updated evidence and inform an updated housing requirement for the RLDP. The paper incorporates the latest available evidence relating to demographic forecasting from Edge Analytics on the latest Welsh Government 2018 based Household Projections, alongside information contained within the Economic and Housing Growth Assessment and the draft Local Housing Market Assessment (LHMA).

1.0.4 This paper focuses on housing components in NPT. It assesses past trends in housing completions. The current LDP policy approach is considered and changes are recommended for the RLDP housing policy approach.

2 Policy Context

2. Policy Context

2.0.1 This section outlines the key policy context for developing the population and housing elements of the Preferred Strategy.

2.1 Legislation

2.1.1 Along with relevant other legislation, the Housing Act 1985, The Local Government Act 2003, the Housing (Wales) Act 2014 and the Social Services and Well-being (Wales) Act 2014 have implications for how the Council addressed and deals with population and housing needs. Together this legislation sets out duties on Local Authorities to:

- Periodically assess the level of housing need in their area. Rewrite the Local Housing Market Assessment (LHMA) every 5 years and refresh the LHMA at least once during that 5 year period.
- Help people who are homeless or threatened with homelessness and make connected provision.
- Carry out an assessment of the accommodation needs of Gypsies and Travellers residing in its area. Undertake a Gypsy and Traveller Accommodation Assessment (GTAA) every 5 years.
- With other partners, gather information on the care and support needs of the population in the form of a Population Assessment.

2.1.2 Evidence arising from all of the above has been taken into consideration in the preparation of the Preferred Strategy.

2.2 Policy & Guidance

2.2.1 Future Wales

2.2.1.1 Future Wales: The National Plan 2040 (FW) is the Welsh Government's national development plan and was adopted 24 February 2021. It provides the spatial context for facilitating the delivery and development in Wales over the next 20 years up to 2040. FW replaces the Wales Spatial Plan, however, FW has development plan status forming the national tier of the development plan hierarchy, with Neath Port Talbot's RLDP required to be in 'conformity' with the strategy and policies of FW. FW and the RLDP (once adopted) will be primary in making planning decisions in Neath Port Talbot's area of planning jurisdiction.

2.2.1.2 FW focuses on national and regional spatial issues and also contains policies. The spatial strategy in FW identifies four regions within Wales, with NPT forming part of the South West Region. Within the South West Region, Policy 28 identifies Swansea Bay and Llanelli as the 'national growth area' which will be the main focus for strategic growth and investment in the region. The area comprising Neath, Port Talbot, the City of Swansea and Llanelli will be the primary growth area for the region.

2.2.1.3 Policy 1 "Where Wales will grow" states that National Growth Areas are; *"internationally and nationally significant places and this strategy promotes their continued growth and regeneration."*

2.2.1.4 FW states a key priority for the WG is the provision of housing. Policy 7 'Delivering Affordable Homes' sets out the policy framework for delivering housing, concentrating on the delivery of affordable homes. The policy states that over the next 20 years (2019-2039) the estimate of additional housing need in Wales is around 110,000 with just over a fifth,

approximately 25,600 of these homes required in south west Wales by 2039. Over the initial five years (2019-20 to 2023-24) 44% of the additional homes needed should be affordable homes.

2.2.1.5 It is noted that FW is based on the principal 2018-based population and household projections without policy intervention. It therefore does not consider the local circumstances and each local authorities' strategic direction on the development of its communities. In NPT, evidence has identified a variety of environmental constraints and significant viability challenges associated with developing housing within the County Borough.

2.2.2 Planning Policy Wales

2.2.2.1 Planning Policy Wales 12 (February 2024) states that the planning the planning system should identify a supply of land to support the delivery of the housing requirement to meet the differing needs of communities across all tenures. PPW emphasizes the need identify land for market and affordable housing provision in an LDP as a key part of place-making to create and enhance sustainable places and cohesive communities.

2.2.2.2 Para 4.2.5 states that; 'Planning authorities must clearly set out the housing requirement in their development plan. These requirements must be based on evidence and clearly express the number of market and affordable homes the planning authority considers will be required in their area over the plan period.'

2.2.2.3 Para 4.2.6 goes on to advise that; 'The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for an area, will form a fundamental part of the evidence base for development plans. These should be considered together with other key evidence in relation to issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh Language considerations and the deliverability of the Plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also be given to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities.'

2.2.2.4 Importantly, in line with Para 4.2.5 the development plan should set an affordable housing target which should be informed by evidence of affordable housing needs and viability. Para 4.2.20 states that; 'At the 'Deposit' stage, there must be a high level plan-wide viability appraisal undertaken to give certainty that the development plan and its policies can be delivered in principle, taking into account affordable housing targets, infrastructure and other policy requirements.'

2.2.3 Development Plans Manual

2.2.3.1 As part of its 'de-risking' check list Local Development Manual Edition 3 suggests the following considerations:

- Plan for realistic housing and economic growth levels based on a robust consideration of need and supply factors, taking into account affordable housing need, viability and deliverability.
- Include an appropriate level of flexibility within the housing and job provision to allow for unforeseen circumstances.

2 Policy Context

2.2.3.2 The Manual notes that the Housing supply is the total housing provision set out in the Plan, comprising the housing requirement plus a flexibility allowance. It notes that "The level of flexibility will be for each LPA to determine based on local issues; the starting point for such considerations could be 10% flexibility with any variation robustly evidenced. The policy framework in the plan should be clear regarding the housing requirement, provision and flexibility allowance." (para 5.59).

2.2.4 Technical Advice Notes

Technical Advice Note (TAN) 2: Planning and Affordable Housing

2.2.4.1 The purpose of this guidance is to set out the context by which LPAs will need to include in development plans an affordable housing target based on the housing need that has been identified and how this target will be achieved through policy intervention.

2.2.4.2 The over riding aim of the revision is to facilitate an increase in the provision of affordable housing via the planning system. To this end, the TAN:

- Provides a step by step guide to the delivery of affordable housing through the planning system;
- Includes a definition of affordable housing for the purposes of the TAN;
- Provides advice to LPAs on how to determine 'affordability';
- Stresses the need for collaborative working (between local authority housing and planning departments and with key stakeholders);
- Requires LPAs to undertake local housing market assessments in participation with key stakeholders to produce a joint evidence base for assessing and monitoring housing requirements;
- Requires LPAs to include an affordable housing target in the development plan based on the housing need identified in the local housing market assessment and to indicate how the target will be achieved using the policy approaches identified in the development plan;
- Requires LPAs to monitor the provision of affordable housing against the target and where necessary, take action to ensure that the target is met; and
- Outlines the role of registered social landlords and planning obligations and conditions in securing affordable housing via the planning system.

Technical Advice Note (TAN) 15: Development and Flood Risk (2004)

2.2.4.3 This TAN provides advice on using development plan and development control to mitigate flood risk. It includes advice on using the development advice maps to determine flood risk and assessing the flooding consequences of proposed development. In this context, the Council will need to be satisfied that any proposals set out in the development plan are justified and that the consequences of flooding are acceptable.

2.2.4.4 New development should be directed away from zone C and towards suitable land in zone A, otherwise to zone B, where river or coastal flooding will be less of an issue. In zone C highly vulnerable development (housing) and Emergency Services in zone C2 should not be permitted. All other new development should only be permitted within zones C1 and C2 if determined by the LPA to be justified in that location.

Technical Advice Note (TAN) 15: Development, Flooding and Coastal Erosion

2.2.4.5 The new TAN 15 is intended to replace TAN 14 Coastal Planning (1998) and TAN 15 Development and Flood Risk (2004). The new TAN was initially made available in September 2021, in advance of its intended formal publication. It is accompanied by the new Flood Map for Planning, which builds on the Flood Risk Assessment Wales map and includes allowances for climate change, and is intended to replace the existing Development Advice Map for use in the planning process.

2.2.4.6 The new Flood Map for Planning (FMfP) amends and updates the flood zones to take into account the latest information and predicted climate change impacts, while the new TAN 15 provides amended and updated advice about the approach to be taken to development proposals in the FMfP flood zones.

2.2.4.7 However, because the revised guidance provides markedly different context for planning decisions compared to the existing framework and has the potential to impact on a variety of development schemes at different stages of the planning process, the introduction of the new TAN and Flood Map for Planning has been suspended by the WG.

2.2.4.8 The existing TAN 14 and TAN 15 therefore remain in force for dealing with planning application for the foreseeable future. The Welsh Minister issued a letter clarifying that the new FMfP should be used for the preparation of new development plans. In this context, the FMfP has been used when assessing constraints, however, the map is updated every six months.

Technical Advice Note (TAN) 18: Transport (2007)

2.2.4.9 TAN 18 includes policies and standards on density in order to achieve higher residential densities in places with good public transport accessibility and capacity. The RLDP should thus guide developments to locations that reduce the need to travel.

Technical Advice Note (TAN) 20: The Welsh Language (2013)

2.2.4.10 TAN 20 supplements the policies set out in PPW, providing guidance on how the planning system should consider the implications of the Welsh language when LDPs are prepared, including the important roles of the Single Integrated Plan (SIP) and LDP Sustainability Appraisal (SA). The guidance states that the land use planning system should where feasible and relevant contribute to the future well being of the Welsh language by establishing the conditions to allow sustainable communities to thrive.

2.2.4.11 Where the Welsh language has been identified as a significant part of the social fabric of some or all of the community, LPAs should ensure plan strategy, policies and land use allocations have regards to the needs and interests of the Welsh language. Possible approaches to support the Welsh Language include provision of mitigation measures such as appropriate phasing policies, adequate affordable housing, including sites for 100% affordable housing for local needs, and the provision of employment opportunities and social infrastructure to sustain local communities.

2.2.5 Building Better Places: Place-making and Covid 19 Recovery

2.2.5.1 This document sets out the Welsh Government's planning policy priorities to assist in taking action in the recovery period after the Covid-19 pandemic crisis. The planning system should be centre stage in the consideration of built and natural environment issues that have arisen from this situation. The National Sustainable Placemaking Outcomes are set out in

2 Policy Context

PPW and are highly relevant at this time. It contains a section on Priorities and Actions for Places and the 8 issues draw out the pertinent points of PPW with commentary on specific aspects of the potential post Covid-19 pandemic situation.

2.2.5.2 Good places are the result of good planning which fully embraces placemaking. Taking a placemaking approach has multiple benefits which not only helps improve quality of life, but also helps us to tackle climate change, reduce our carbon footprint and improve biodiversity and ecological resilience for the future. Our legal obligations under the Environment and Well-being of Future Generations Acts must be recognised and our actions must not be diluted. The National Sustainable Placemaking Outcomes are set out in PPW and are highly relevant at this time and will be incorporated into the RLDP.

2.2.6 Placemaking Charter Wales

2.2.6.1 Neath Port Talbot Council is a signatory of the Placemaking Charter Wales, a charter developed by the Welsh Government and the Design Commission for Wales along with the Placemaking Wales Partnership. Signatories pledge to involve the local community in the development of proposals, to choose sustainable locations for new development and to prioritise walking, cycling and public transport.

2.2.6.2 The Placemaking Charter Wales set out six principles which encourages housing and other uses to be planned in a way which help reduce the need to travel. It also promote development density and a mix of uses and tenures to help support a diverse community and vibrant public realm.

2.3 Adopted Local Development Plan 2011-2026

2.3.1 The current LDP was adopted in January 2016.

2.3.2 The current LDP identified 18 key issues, a number of which are relevant to housing including the following:

- KI 2: Residents in Neath Port Talbot experience some of the worst health in Wales.
- KI 5: There is a need for additional homes to: (i) accommodate the population needed to meet the projected number of jobs; and (ii) address the reduction in average household size.
- KI 6: There is a need for additional affordable housing throughout the County Borough.
- KI 7: There is a need for additional Gypsy and Traveller Pitches.

2.3.3 The current LDP vision sets out how NPT is envisaged to change over the plan period including; 'New and expanded settlements will provide sustainable housing and employment to meet the needs of local communities and the wider area'.

2.3.4 It also sets out 25 objectives, numbers 7, 8 and 9 under the Building Healthy, Sustainable Communities theme are most relevant to the topic area discussed in this paper and are set out below:

- OB 7: Provide an adequate supply, mix, type and tenure of housing within sustainable settlements to meet the needs of the projected population. [KI 2, KI 5, KI 6 and KI 7]

- OB 8: Provide additional affordable housing units throughout the County Borough and ensure new housing developments make a fair and justified contribution towards the provision of affordable housing. [KI 2 and KI 6]
- OB 9: Deliver additional pitches, to meet the identified need of Neath Port Talbot's Gypsy and Traveller community. [KI 2 and KI 7]

2.3.5 The NPT LDP provides a locally specific framework for the delivery of housing over the Plan period (2011-2026) within NPT through:

2.3.6 **Strategic Policy (SP) SP7 'Housing Requirement'** states that "*in order to deliver the 7,800 new dwellings required to meet the economic-led growth strategy, provision will be made for the development of 8,760 additional dwellings between 2011 and 2026 including a 12.31% flexibility allowance*"; and that

2.3.7 Explanatory Text Paragraphs 5.1.4-6 state that the housing supply will include the following components:

- **Site specific housing allocations:** Newly identified sites for housing/ mixed-use development including an element of housing;
- **Site specific housing Landbank sites:** Sites with planning consent for housing/ mixed-use development including an element of housing at the LDP base-date (1st April 2011);
- **Windfalls:** Sites of 10 or more residential units which are not specifically identified within the Plan which may comprise previously developed sites which may unexpectedly become available over the Plan period; and
- **Small sites:** Sites with a capacity of less than 10 residential units which comprise previously undeveloped land and small windfall sites.

2.3.8 **Policy H1 'Housing Sites'** allocates a number of sites for residential development;

2.3.9 Table 6.1 details the expected implementation and phasing for the delivery of the sites; and

2.3.10 **Monitoring Indicator 39** establishes annual targets for the delivery of housing over the Plan period. The NPT LDP covers a period of 01/04/2011 to 31/12/2026. The last year of the housing trajectory therefore only includes anticipated supply over a 9 month period. Once the end date of the plan has passed, it will no-longer form part of the statutory development plan for the County Borough and instead Future Wales will be relied upon for planning decision making.

2.3.11 **Strategic Policy SP8 Affordable Housing** states that; "*Provision will be made to deliver 1,200 affordable housing units within Neath Port Talbot over the Plan period (2011-2026) through the following measures: 1. Setting thresholds and targets requiring housing developments to contribute to affordable housing provision; and 2. Providing a framework for determining affordable housing exception sites.*"

2.3.12 The supporting text goes on to explain that of the 7,800 new dwellings required over the LDP period, of these 1,200 will be 'affordable'. The following paragraphs set out the definition of affordable housing as defined by Technical Advice Note 2 (2006).

2.3.13 **Policy AH1 Affordable housing** sets out the thresholds and percentage targets for affordable housing in different spatial areas and **Policy AH2 Affordable Housing Exception Sites** defines such sites and sets out criteria for the consideration of relevant proposals.

2 Policy Context

2.3.14 Strategic Policy SP9 Gypsies and Travellers states that; Provision will be made for 20 Gypsy and Traveller pitches through the following measures: 1. The allocation of a site; and 2. Providing a framework to assess proposals for additional Gypsy and Traveller sites. **Policy GT1 Gypsy and Traveller Site** allocated site GT1: Cae Garw Margam for the provision of 11 Gypsy and Traveller pitches. **Policy GT2 Proposals for New Gypsy and Travellers Sites** is a criteria based policy.

2.3.15 Prior to commencement of the preparation of the RLDP, the Council prepared a Review Report on the current LDP¹. As part of this the Council reviewed the LDP strategy, policies and allocations. The Review Report identified the shortfall in housing delivery as one of the primary issues that would need to be addressed in the RLDP.

2.3.16 As part of the preparation of the RLDP, the Council (jointly alongside Swansea Council) appointed Turleys to undertake a Local Housing Market Assessment (LHMA) and Economic and Housing Growth Assessment. These have also identified shortfalls in the supply of housing provision as a key consideration for the preparation of the RLDP, particularly given the economic recovery context in the County Borough. Through the preparation of the RLDP, the Council is therefore keen to work with landowners, developers and agents to understand the barriers to the delivery of housing in the Authority and encourage future delivery of housing.

2.3.1 Findings of the Annual Monitoring Reports and Review Report

2.3.1.1 In line with national guidance, the review of the LDP should along with other factors, draw on the findings of the published LDP Annual Monitoring Reports (AMRs). The LDP Monitoring Framework forms the basis of the AMR and over time enables the assessment of how the Plan's strategic policies and supporting detailed policies are performing against the identified targets and outcomes.

2.3.1.2 The framework contains a total of 89 indicators, comprising a small number of core indicators (prescribed by LDP Regulations), along with a range of local and contextual indicators identified by the Council. Each indicator has a specified target along with a 'trigger' which identifies the point or level at which any deviation will trigger the need for further action to be considered and/or taken.

2.3.1.3 Since LDP adoption, a total of seven AMRs have been published. The latest AMR was published in October 2023 and covers the monitoring period 1st April 2022 to 31st March 2023. A brief summary of the outcome of the latest year's monitoring is provided below.

SP7 - Housing Requirement

2.3.1.4 The LDP makes provision for 8,760 housing units in order to deliver the 7,800 dwellings required to meet the economic-led growth strategy by 2026. The delivery of housing across NPT continues to fall behind the targets contained within the monitoring framework. Housing completion figures have been gathered from discussions with developers and reviewing completion data from the Council's Building Control and Council Tax records. Since the LDP base date (2011), the number of housing completions totals 2,659 dwellings. Compared against the annual cumulative target of 6,770 in the monitoring framework, this shows that completions continue to fall below target and that just 39% of the

1 Available

at: <https://www.npt.gov.uk/media/13823/ldp-review-report-july-2020.pdf?v=20200709084011>

cumulative annual target has been delivered to date. The table below sets out the completions according to the AMRs. Whilst the 2024 AMR hasn't been published to date, the completions figure according to the Council's on-going monitoring for 2023/2024 has been included to provide the most up to date information.

Table 2.3.1.1 Dwelling Completions Adopted Plan Period To Date

Year	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24
Total Completions	277	303	262	314	214	184	119	276	259	149	100	102	100

2.3.1.5 Due to the significant under delivery in each year of the plan to date, it is acknowledged that the LDP will not deliver the full housing requirement of 7,800 from the total housing supply of 8,760 by the end of the Plan period. The Housing Trajectory shows a gradual increase in housing completions throughout the remainder of the Plan period. The Council has taken a cautious approach to the inclusion of sites and recognises however that the numbers are below the Average Annual Requirement (AAR).

2.3.1.6 The LDP Review Report, published in July 2020, identified the shortfall in housing delivery as one of the primary issues that would need to be addressed in the RLDP. The Council commenced the review of the LDP in January of the 2020/21 monitoring period. Through the former Joint Housing Land Availability Process set out in Technical Advice Note 1 (now revoked), as part of the Annual Monitoring Reports preparation and as part of the Call for Candidate Sites process, the Council has tried to engage with site promoters of undeveloped allocated sites in order to ascertain why sites have not come forward for development. The Housing Trajectory will continue to be subject to revision annually and any changes in trends in windfall, small sites and large site build out rate assumptions will be amended.

SP8 Affordable Housing

2.3.1.7 The NPT LDP aims to deliver an appropriate mix and supply of housing. SP8 'Affordable Housing' sets out the requirement for the delivery of affordable housing over the plan period (1,200 affordable housing units over the Plan period of 2011-2026) and the approach to the delivery of affordable housing. The appraisal of the indicators has concluded that SP8 is not achieving its objectives and that it should be reviewed as part of the LDP review.

2.3.1.8 The latest AMR 2023 shows the delivery through the planning system of 72 affordable homes to date against the cumulative target of 935.

Table 2.3.1.2 Affordable Housing Completions by Year

Year	Annual Targets	Actual Affordable Housing Units Delivered	Cumulative Target	Cumulative Completions	Cumulative Delivery Against Target
2011/12	7	11	7	11	4
2012/13	5	0	12	11	-1
2013/14	22	0	34	11	-23
2014/15	37	23	71	34	-37
2015/16	72	8	143	42	-101
2016/17	90	0	233	42	-191
2017/18	115	8	348	50	-298

2 Policy Context

Year	Annual Targets	Actual Affordable Housing Units Delivered	Cumulative Target	Cumulative Completions	Cumulative Delivery Against Target
2018/19	130	0	478	50	-428
2019/20	124	18	602	68	-534
2020/21	120	4	722	72	-650
2021/22	111	0	833	72	-761
2022/23	102	0	935	72	-863

2.3.1.9 However, in addition to the affordable housing units delivered through the planning system, a number of affordable homes have been delivered through the provision of capital funding including Social Housing Grant (SHG) funding provision.

Table 2.3.1.3 Capital Funded Affordable Housing Units

Year	No. of Capital Funded Affordable Units Delivered
2011/12	51
2012/13	93
2013/14	70
2014/15	34
2015/16	36
2016/17	87
2017/18	0
2018/19	135
2019/20	118
2020/21	52
2021/22	66
2022/23	40
2023/24	107
Total	889

2.4 Housing Strategy

2.4.1 The Council has a host of plans, strategies and programmes which seek to set out the Council's strategic approach towards meeting housing needs within the County Borough. A summary of these is provided in the following paragraphs.

2.4.2 NPT Housing Support Programme Strategy 2022-2026: The purpose of this strategy is to outline the strategic direction of the local authority for housing support services and provide a single strategic view of NPT's approach to homelessness prevention and housing support services, including both statutory homelessness functions funded through the revenue settlement and non-statutory preventative services funded through the Housing Support Grant (HSG). In addition to this, the strategy will also take into account what we as a local authority will do to support the delivery of Welsh Government's visions and aims in the prevention of homelessness and further the transformational shift required in order to move to the new rapid re-housing approach. Local authorities are required to develop a Housing Support Programme Strategy every four years, with a mid-point review every two years. Our vision is to create a Neath Port Talbot where everyone has an equal opportunity to be healthier, happier, safer and prosperous. To help achieve this we aim to tackle the

root cause of homelessness, to ensure that Neath Port Talbot is a place where nobody is homeless and everyone has a safe home where they can flourish and live a fulfilled, active and independent life. The Strategy sets out 5 priority areas:

- Priority 1— Strengthening approaches to early intervention and prevention.
- Priority 2—Working in partnership.
- Priority 3—Rapid rehousing.
- Priority 4—Strengthening or improving access to support services.
- Priority 5—Joint commissioning.

2.4.3 Rapid Re-housing Transition Plan 2022-2027: This plan outlines Neath Port Talbot County Borough Council's transition to using the rapid rehousing model to tackle homelessness over the next five years. This follows WG's high level action plan 2021-2026 "Ending Homelessness in Wales" which recognised the significant and increasing pressure on homelessness services, and the urgency of making "a transformational shift required to end homelessness". The approach the strategy takes is that we will work towards a Wales where homelessness is rare, and where it occurs it will be brief and unrepeatable. Rapid Rehousing (RRH) is an intervention designed to help households quickly exit a homelessness crisis, and to avoid becoming homeless again. It is a housing led solution, but is focused around the needs of the individual – a person centred approach. The ultimate objective is to offer housing that is safe, affordable, decent, and meets the needs of the individual in terms of location, proximity to family, services, access to transport and facilities such as shops and schools. The plan includes 10 Priority Actions for the period to March 2027.

2.4.4 A place to call home, Draft Housing and Homelessness Strategic Plan 2023/24-25/26: This is a 3 year Housing and Homelessness Strategic Plan for Neath Port Talbot. We want all citizens of Neath Port Talbot to have access to safe and appropriate housing, this Plan sets out Neath Port Talbot County Borough Councils (the Council) strategic approach to managing the challenges of homelessness and affordable housing across the borough. The aim is to support individuals and families to gain access to good quality accommodation and to tackle homelessness in all its forms and anyone affected by homelessness. It identified the key challenges to be addressed including: Available grant funding, supply of social housing, affordability in private rental sector housing, land and land values, people presenting with multiple and complex needs, the impact of the cost of living. It outlines 9 strategic principles (Plan, Prepare, Placemaking, Preservation, Partnership, Prevent, Personalised, Positive and Provide) and four priority areas (Implement a more strategic approach, prevent homelessness, increase access to appropriate affordable housing, support those with social care needs to live well in their communities).

2.4.5 Affordable Housing Prospectus 2024: The WG require Local Authorities to prepare a prospectus annually. This latest Prospectus sets out how we intend to use our management of the local WG Grant Programmes and other funding sources to provide as much extra affordable housing as possible for households in need. It summarises and defines the strategic priorities for meeting the housing need/demand in NPT using Social Housing Grant, Recycled Capital Grant, Housing with Care Fund, Transitional Accommodation Capital Programmes and Section and financial contributions secured through Section 106 legal agreements for affordable housing provision. This in turn enables Registered Social Landlords to bring forward schemes for the right type of homes in the right places. It also includes an assessment framework for proposed schemes.

2 Policy Context

2.4.6 One of the key issues for the County Borough relates to increasing homelessness representations and temporary accommodation needs. Due to rising demand and significant cost implications, there is an on-going transition from the use of guest houses, B & Bs and Hotels to purpose built temporary accommodation and ensuring that there is sufficient and appropriate accommodation to allow households to move on from temporary accommodation into more stable and permanent accommodation as quickly as possible. This issue emphasizes the importance of seeking to help to meet market and affordable housing needs through the plan making process.

2.5 Corporate and Well-being Plans

2.5.1 All of the above work is underpinned by the Council's Corporate plan and the NPT Well-being Plan.

2.5.2 Recover, Reset, Renew: The Neath Port Talbot Corporate Plan 2022-2027 sets out the Council's priorities for the 5 year period 2022-2027, including recovery from the Covid-19 pandemic and how the authority will reset and renew to face future challenges. The Corporate Plan (2022) sets out key issues and trends to be addressed and includes a vision which comprises four key objectives:

- All children get the best start in life;
- All communities are thriving and sustainable;
- Our local environment, heritage and culture can be enjoyed by future generations;
- Local people are skilled and can access high quality, green jobs.

2.5.3 The **Neath Port Talbot Well-being Plan 2023-2028** was prepared by the Neath Port Talbot Public Services board and published in May 2023. The Plan sets out local well-being objectives; steps to be taken to achieve the objectives; timescales and responsibilities and details about how the steps will be achieved in accordance with the sustainable development principle. The local well-being objectives mirror the Council's corporate plan objectives and the two most relevant to the housing topic area include:

- To ensure all children get the best start in life;
- To ensure all our communities are thriving and sustainable;

3. Population and Housing Needs

3.1 Demographic Profile

3.1.1 In June 2022 initial 2021 Census data releases indicated that there were 142,300 residents living in NPT in 2021. This made it the 9th most populous local authority in that year in Wales and the 196th most populous local authority in that year across England and Wales combined.

Census 2021

3.1.2 The table below shows the population change between the 2011 and 2021 Census. NPT's population grew by 1.78% over that period, ranking it 8th in Wales in terms of population growth. The all Wales population growth was 1.44% with this growth being driven by larger towns/cities with the highest level of growth recorded in Newport at 9.51%. Rural counties with higher levels of deprivation lost population or had comparatively low growth rates.

Table 3.1.1 Comparison of 2011 and 2021 Census Usual Resident Population

Council	2011 Census	2021 Census	Percent: 2011-2021 Census Growth	Rank: Percent: 2011 to 2021 Census Growth
Blaenau Gwent	69814	66900	-4.17%	21
Bridgend	139178	145500	4.54%	3
Caerphilly	178806	175900	-1.63%	19
Cardiff	346090	362400	4.71%	2
Carmarthenshire	183777	187900	2.24%	5
Ceredigion	75922	71500	-5.82%	22
Conwy	115228	114800	-0.37%	17
Denbighshire	93734	95800	2.20%	6
Flintshire	152506	155000	1.64%	9
Gwynedd	121874	117400	-3.67%	20
Isle of Anglesey	69751	68900	-1.22%	18
Merthyr Tydfil	58802	58800	0.00%	15
Monmouthshire	91323	93000	1.84%	7
Neath Port Talbot	139812	142300	1.78%	8
Newport	145736	159600	9.51%	1
Pembrokeshire	122439	123400	0.78%	12
Powys	132976	133200	0.147%	14
Rhondda Cynon Taff	234410	237700	1.40%	10
Swansea	239023	238500	-0.22%	16
Torfaen	91075	92300	1.35%	11
Vale of Glamorgan	126336	13180	4.32%	4
Wrexham	134844	135100	0.19%	13
Wales	3063456	3107700	1.44%	

3.1.3 Figure 4.5 of the Economic and Housing Growth Assessment (EHGA) illustrates the evolution of the overall population of NPT from 2001 to 2022, based on official estimates produced by the ONS. This shows that NPT's population growth is slowing and that lower levels of population growth were experienced over the adopted LDP period to date than in

3 Population and Housing Needs

the preceding 10 years (2001-2011). The analysis indicates that the level of housing supply, while short of planned targets, has generally still enabled population growth with only a few years implied to have seen a very marginal reduction.

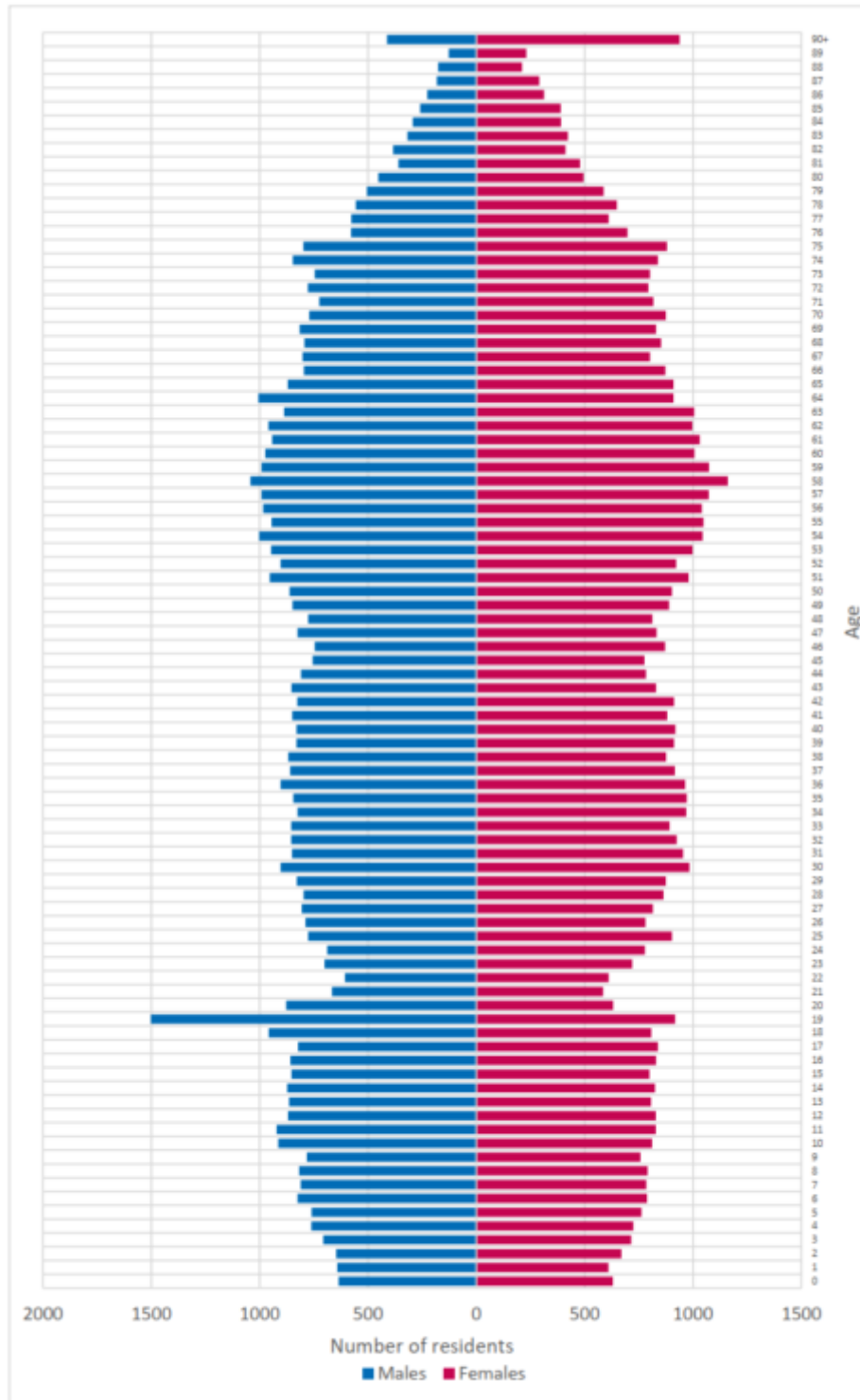
3.1.4 Notwithstanding this uncertainty, the ONS estimates that net migration from other parts of the UK – or internal migration – has been the main driver of population growth in NPT since 2011, with signs of a return to the larger inflows recorded earlier in the preceding decade before the last recession. There is also believed to have been a net inflow of international migrants with these inflows collectively offsetting the increasingly large excess of deaths over births, which was particularly large in 2020 and may have been influenced by the early months of the pandemic (where it covers twelve months to the end of each June). Figure 4.6 of the EHGA shows the various components of population in NPT from 2001-2022.

3.1.5 The analysis also shows that the population of NPT has rapidly aged during the adopted LDP period to date. Table 4.1 of the EHGA shows how the age profile of NPT has changed over the plan period, with residents aged 65 and above increasing by 17%.

3.1.6 The EHGA explains that in NPT, the age category under age 15 remained similar in proportionate terms between 2011 and 2022. It is noted in the case of the age 16-29 category that the slight reduction (-4%) is perhaps surprising in the context of the delivery of the Swansea University Bay Campus, which will have attracted additional students, albeit it is assumed the impact of this has been offset by reductions in other ages outside of those of university age. The proportion of the population in the age groups 30-44 and 45-64 have also slightly decreased between 2011 and 2022. This suggests that the proportion of the population that is of working age has reduced.

3.1.7 Across Wales, the proportion of people aged under 15 years remained similar. The proportion of the population in the age group 16-29 in Wales decreased by c.2% from 2011 to 2022. The proportion of people in the age group 30-44 decreased by c.1% over this period. There was a large increase (c. 4%) in the proportion of the population in Wales that is aged 65+ from 2011 to 2022.

Figure 3.1 EHGA Figure 4.7 NPT Population 2022



Source: ONS

3.1.8 Figure 3.1 illustrates the age structure of NPT’s population in 2022, using a population pyramid. The EHGA details further demographic and economic trends being experienced by the County Borough including:

3 Population and Housing Needs

- Larger than expected households
- An apparent fall in economic participation
- An increasingly skilled workforce

3.1.9 A more detailed demographic profile of the 8 different spatial areas within NPT is provided within the draft LHMA.

Western Bay Population Assessment

3.1.10 This assessment has been prepared by Abertawe Bro Morgannwg University Health Board together with Neath Port Talbot County Borough Council, the Swansea City and County Council and Bridgend County Borough Council and other partner organisations in the third sector. The area that this assessment covers includes around 529,000 people. Looking into the future, population projections show that the population size of all three areas will increase. By 2036, the total population for Western Bay has been estimated to increase by 6.4% to approximately 563,000.

3.1.11 The assessment considers:

- the range and level of services required to meet the care and support needs of people living within the region
- where there are gaps in service provision, and how these can be addressed
- what changes are required to improve services in the future.

3.1.12 The assessment covers a range of core themes in relation to the health and well-being of our population including:

- Carers who need support
- Children and Young People
- Health/Physical Disabilities
- Learning Disability and Autism
- Mental Health
- Older People
- Safeguarding adults and deprivation of liberty safeguard
- The secure estate
- sensory impairment
- violence against women, domestic abuse and sexual violence

3.1.13 The care and support needs of the population are intrinsically linked with factors that the RLDP will influence including recreation, open space, education and living accommodation provision. Where the above results in land use needs, they will be taken into account in the preparation of the RLDP.

3.2 Household Formation

3.2.1 The 2021 Census reported that there were 62,400 households located in NPT, representing an increase of circa 2,000 households from the 2011 Census. This equates to a 3.3% increase in the number of households over this period. Aside from generally being older, residents of NPT also generally appear to be living in larger households than was anticipated at the start of the plan period. As of the 2011 Census, each household in the County Borough contained an average of 2.30 people. The WG's then-latest (2008-based) projections expected this to reduce to 2.02 people by 2021, but the Census of that year

confirmed that it fell much more modestly to only around 2.28 people. This may be one consequence of providing less housing than was planned, with some individuals potentially left with no choice but to stay in the family home or share with other adults.

3.2.2 The official 2018-based household projections from the WG make a series of assumptions on the size of households lived in by individuals of different genders and ages, referred to as household membership rates. These are then applied to its own principal projection and the variants to suggest that there could be an additional 92 to 280 households per annum in NPT over the emerging plan period. These same assumptions can also be applied to the other scenarios developed by Edge Analytics, to provide an indication of the associated household growth.

3.2.3 This can then be converted into dwellings, with the Manual endorsing the use of a 'vacancy rate' that allows for the churn of stock. A fixed vacancy rate of 2.5% has been applied based on the latest available Council Tax data [WG (2022) Council tax dwellings by local authority (number of dwellings)], aligning with best practice by allowing for the current proportion of empty homes (1.7%) and second homes (0.8%).

Table 3.2.1 EHGA Table 8.1 Applying official 2018-based assumptions on household membership

Scenario	Extra residents 2023 to 2038	Extra households 2023 to 2038	Extra households per annum	Homes needed 2023 to 2038	Homes needed per annum
High 2018-based	8,900	4,280	285	4,389	293
Principal 2018-based	5,313	2,883	192	2,956	197
Long-term trend (exc. UPC)	4,778	2,706	180	2,774	185
Long-term trend	4,470	2,501	167	2,565	171
Employment Led (CE Baseline)	1,777	1,167	78	1,196	80
Low 2018-based	245	1,032	69	1,058	69

3.2.4 Under delivery of housing has had implications for existing residents; with younger adults living in increasingly larger households. Turleys have taken this into consideration when modelling future projections by making an adjustment to Household Membership Rates, (the rate at which population is converted into households). The adjustment would provide an uplift in housing need, assuming the development of additional homes would allow hidden households to make a choice to form their own households.

3.3 General and Affordable Housing Needs

3 Population and Housing Needs

3.3.1 The EHGA considered demographic led growth scenarios and developed policy led growth scenarios to support the economic context relating to the TATA Steelworks transition and jobs growth arising from planned investments such as those associated with the Celtic Freeport. The table below sets out the population growth and homes needed to support these investment led scenarios which informed the development of the growth options considered. Further information on the growth options considered can be found in the Growth and Spatial Options Background Paper.

Table 3.3.1 EHGA Table 8.2 Population Growth and Homes needed to support investment-led scenarios

Scenario	Extra Residents 2023 to 2038	Homes needed per annum
High 2018-based	8,900	293
Principal 2018-based	5,313	197
Long-term trend (exc. UPC)	4,778	185
Long-term trend	4,470	171
Employment-led supplementary adjusted	4,424	142
Employment-led CE Baseline	1,777	80
Low 2018-based	245	71
Employment-led core adjusted	836	46

3.3.2 Notwithstanding the above work, the Council also commissioned Turley Associates to prepare a Local Housing Market Assessment (LHMA) for the County Borough using the new WG LHMA guidance, tool and template. The LHMA report presents 5 different projections, one of which has been selected as the preferred estimate of housing need. The consideration of which is the most appropriate projection is summarised below.

3.3.3 The two user-defined projections are policy on approaches which are now subject to further change given the new RLDP plan period and more up to date emerging evidence.

3.3.4 The re-based principal projection is no-longer considered appropriate because new and revised mid-year population estimates have been published.

3.3.5 The re-based 2018-based principal projection adjusted is a demographic led projection with an adjustment to household membership rates to take into account concealed households. Whilst this projection also supports a level of economic growth identified in the draft EHGA, the level of economic led growth which will be factored into the new RLDP 2023-2038 will be considered as part of a future update to the LHMA.

3.3.6 It should be noted that the RLDP plan period changed during the preparation of the LHMA. Preliminary findings from the initial Call for Sites in 2022, alongside information obtained from the Council's Annual Monitoring Reports (AMRs) and growth projections, indicated that there was a requirement for additional housing to be identified in addition to existing infrastructure and viability matters that required additional time to overcome. Given this, the Council decided to stop the preparation of the RLDP and start again. The Council

approved a new DA in October 2023 which was subsequently approved by the WG. The RLDP period subsequently changed from 2021-2036 to 2023-2038, but this was after the draft LHMA was initially prepared and submitted to Welsh Government for consideration in May 2023.

3.3.7 In relation to the RLDP preferred level of growth, choosing a higher or user defined projection was not considered to be appropriate given the current widespread uncertainties around future economic growth in the County. Instead an economic-led scenario which factors in economic recovery was considered to be the best approach.

3.3.8 Given the changes to the timescales for the preparation of the RLDP, the RLDP plan period and the considerations set out above, the housing need figure presented accords with the WG official 2018-based projection Principal variant. This is considered to be best reflection of a baseline need figure.

3.3.9 Future re-refresh and re-writing of the LHMA will take into account the new and most up to date evidence available and will inform the preparation of the RLDP 2023-2038 at the appropriate times.

3.3.10 The LHMA considers in detail the housing market including tenures, prices and affordability.

3.3.11 The key findings of the draft LHMA are set out below:

- Over the 15 year period 2021-2036, 4,445 (296 per annum) additional homes are needed. Of which, 2465 (493p.a.) of these are needed within the 1st 5 years of the 15 year period.
- Of the total housing needed, 45% (1980 units) is market housing need, and 55% (2465 units) is affordable housing need.
- Over the 15 year period, on average, 164 affordable homes are needed annually.
- In terms of affordable tenures, of the total affordable housing needed, the majority 88% is social rented housing need, and remainder 12% is intermediate housing need.
- Due to the backlog of affordable housing need (as determined by the social housing waiting list), there is an existing unmet affordable housing need of 542 homes per annum in the 1st 5 years.
- Annually throughout the 15 year period, there is a newly arising affordable housing need for 66 homes and a newly arising market housing need for 132 homes.
- Housing needs distribution across the County Borough is set out below:

Table 3.3.2 Draft LHMA Housing Needs by Housing Market Area

Housing Market Area	Affordable Housing Need 2021-2036	Market Housing Need 2021-2036	Total Housing Need 2021-2036	Percentage of Total Housing Need (%)
Afan Valley	85	90	175	4
Amman Valley	90	60	150	3
Dulais Valley	95	60	155	3
Neath	915	735	1650	37
Neath Valley	115	120	235	5
Pontardawe	150	165	315	7
Port Talbot	905	675	1580	35
Swansea Valley	115	90	205	5

3 Population and Housing Needs

3.4 Specialist and Older Persons Needs

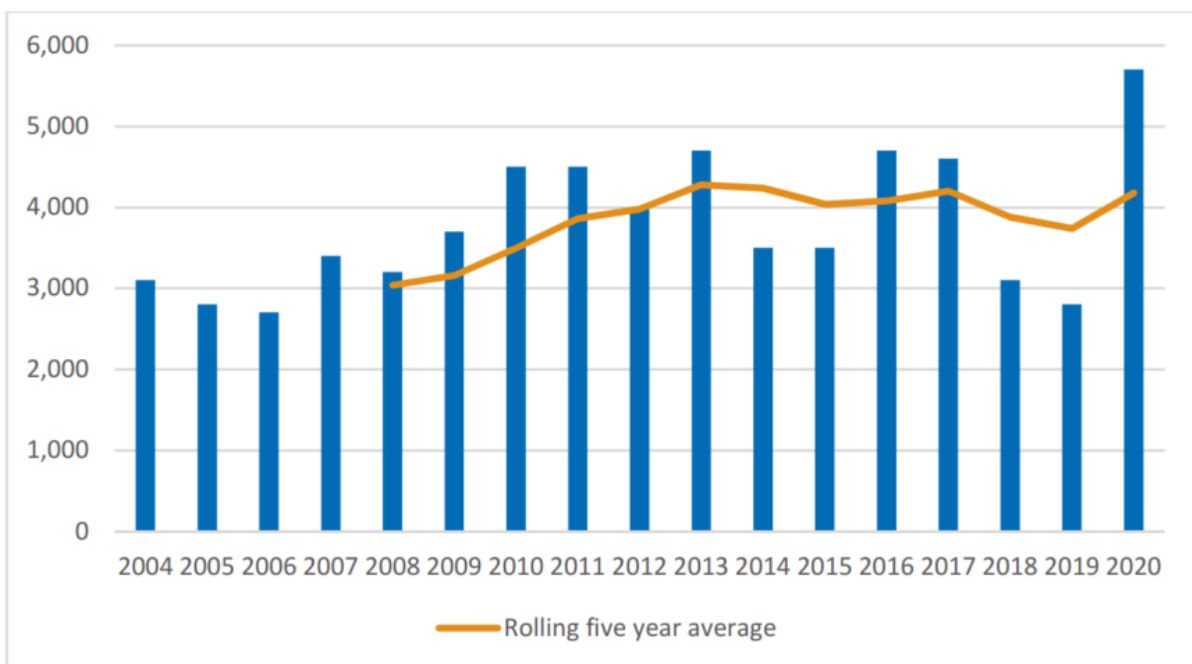
3.4.1 NPT has an aging population and the accommodation needs associated with an aging population are therefore an important consideration. According to the draft LHMA, over the 15 year period there is a specialist housing need for 723 units (48 p.a.). Appendix 2 of the draft LHMA considers the need for specialist accommodation in detail. Data analysis suggests that there could be as many as 4,724 more residents aged 75 or above in NPT by the end of the period in 2036, compared to 2021. It uses the Housing LIN SHOP toolkit to estimate that circa 43-54 individuals could need specialist housing (e.g. sheltered housing or extra care) every year between 2021 and 2036, while a further 16-21 bedspaces in communal establishments like care homes could also be needed per annum.

3.4.2 The plan will seek to ensure that a range of housing types, sizes and tenures are provided to meet all types of identified housing needs. Further engagement with housing strategy and social services will be undertaken for the Deposit Draft Plan to ensure that the specific housing needs of our aging population can be addressed as part of sustainable placemaking.

3.5 Student Needs

3.5.1 The LHMA explains the difficulties in accurately estimating the number of students resident in the County Borough, however figure 3.33 of the LHMA suggests that there is approximately 5,700 students, which equates to 4% of the County borough's resident population.

Figure 3.2 LHMA Figure 3.33 Number of Students in NPT (2004-2020)



Source: APS

3.5.2 In terms of student accommodation, Swansea University officially opened its Bay campus, on Fabian Way in NPT, in 2016 which offers some 2,500 bedspaces in total. The accommodation which is some distance from the University's singleton campus, includes en-suite provision which improves its attractiveness, particularly for those also studying at the Fabian way campus and is not limited to 1st year students only. Around 400 second year students believed to be accommodated on campus and the remainder living either at home, are in Houses of Multiple Occupation (HMOs) or elsewhere.

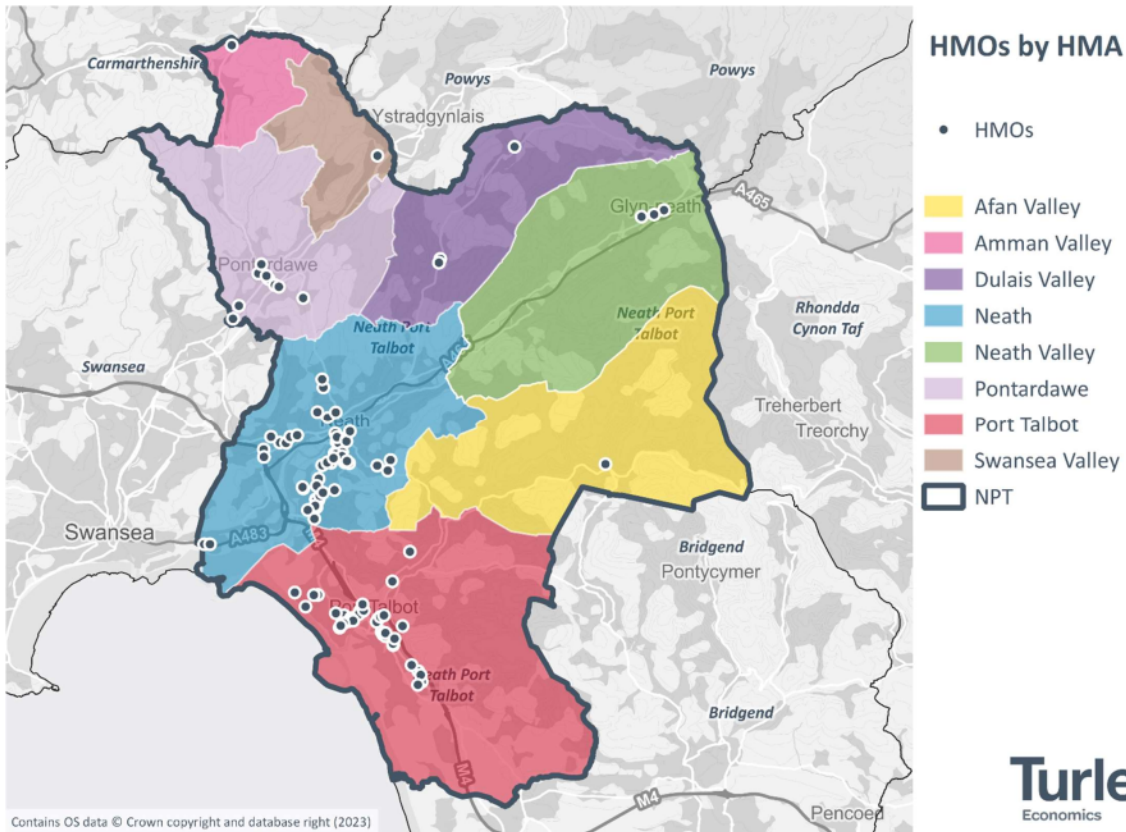
3.5.3 Swansea University continues to observe the development of new purpose-built student accommodation (PBSA) predominantly in Swansea city centre and has no immediate plans to develop further accommodation at the Bay campus. The university is currently facing a particular challenge related to accommodating international students, some of whom have tended to bring families thus putting pressure on the limited stock that can accommodate them. The university has sought to discourage such students from bringing their families, and has no plans to develop new family accommodation due to the associated need for safeguarding and an awareness that the situation can rapidly change.

3.5.4 The University of Wales Trinity Saint Davids (UWTSD) also has student accommodation located in Swansea and is distributed over two campuses, totalling 250 units. Within the university provided accommodation, the recently built Llys Glas has provided 84 en-suite units. Whilst there are multiple areas of student accommodation across the Swansea area for students attending the university, but none were reported to be in NPT. These include university provided accommodation, Seren CRM, Oldway Centre- Fresh, Coppergate- Prime Student, True Student Living, the Student Roost, Crown Place CRM and SA1 Campus. The number of students at UWTSD is expected to increase in the future, although no documentation or reference to quantify the scale of this anticipated growth has been provided. Engagement with UWTSD suggested that there were no plans to develop further university owned accommodation in NPT, or indeed in Swansea, with the university understanding that private market developers were considering providing new PBSA in Swansea and identifying new sites on which to do so.

3.6 Houses of Multiple Occupation

3.6.1 The Council maintains a record of the Houses in Multiple Occupation (HMOs) that are located in NPT. A house in multiple occupation (HMO) is a residential property where multiple households share common areas. This suggests that there are currently around 131 such properties, more than half of which (52%) are in Neath with a further third being in Port Talbot. Pontardawe has the next highest, with nine, but no other Housing Market Area (HMA) is reported to have more than three HMOs as can be seen from Figure 3.26 of the LHMA.

Map 3.1 LHMA Figure 3.26 Location of HMOs by Housing Market Area (HMA)



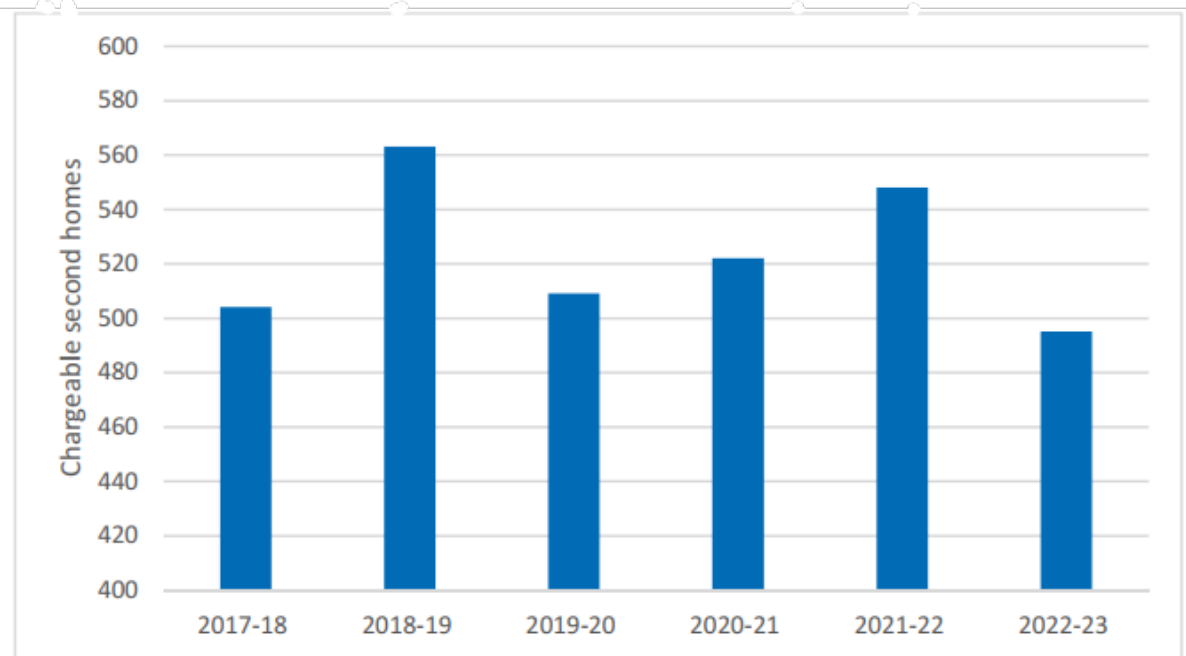
Source: Council monitoring

3.6.2 Further, more detailed analysis to identify clusters of HMOs will be undertaken to inform the Deposit Plan. Where clusters are identified, the Council will consider the need to introduce detailed policy measures to control the proliferation of HMOs within particular communities and streets.

3.7 Holiday Accommodation & Second Homes

3.7.1 As set out in the LHMA, according to Council Tax data published by the WG, in 2022/23 there were 495 second homes throughout NPT, albeit it is important to recognise that not all will be holiday homes with some properties categorised as such if their owner moves in with relatives or is in the process of selling. Circa 0.8% of all dwellings in NPT are second homes, with this being less than half the rate recorded for Wales as a whole (1.7%).

Figure 3.3 Figure 3.20 LHMA Number of Chargeable Second Homes in NPT (2017-22)

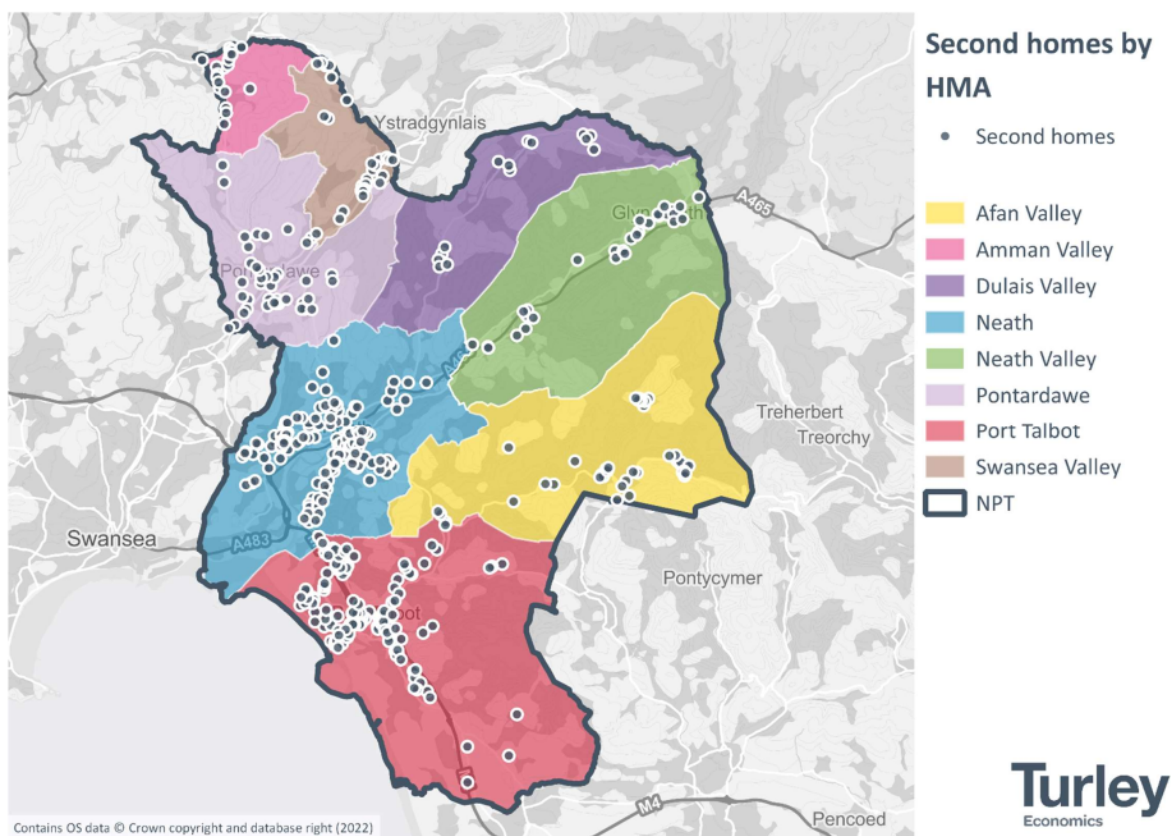


Source: WG

3.7.2 The number of second homes in NPT has fluctuated in recent years, peaking when 563 were recorded in 2018/19 but reducing by around 10% in the subsequent year. While this was followed by another rise of 8% over two years, there appears to have again been another fall of 10% ahead of the current year (2022/23).

3.7.3 Further analysis in the LHMA shows the precise location of the 508 second homes that it recorded in June 2022. It shows that second homes are spread throughout every HMA, with grouping around transport corridors and the greatest number in Port Talbot and Neath. Afan Valley is reported to have the most second homes relative to the size of its dwelling stock, as recorded by the 2011 Census which continues to provide the most up to date dwelling counts for the HMAs at the time of writing.

Map 3.2 Figure 3.21 LHMA Location of Second Homes by Housing Market Area (HMA) (June 2022)



Source: Council monitoring

3.7.4 Further analysis on the relationship between second homes and the Welsh language is provided within the LHMA. Initial market research suggests that the County Borough has experienced a rise in the numbers of Airbnb facilities in recent years. Further assessment of the amount of holiday use accommodation within the area will be undertaken in relation to the tourism topic area to inform the Deposit Plan.

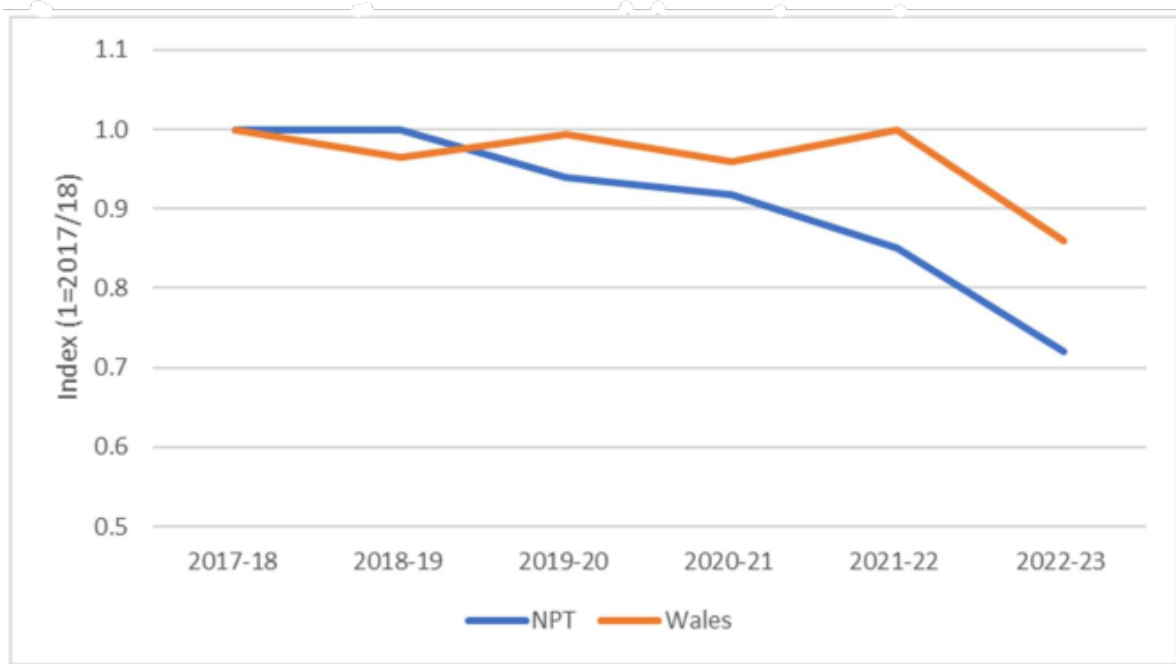
3.7.5 Given the very low percentage of overall housing stock that is a second home, this is not considered to be a significant or key issue for the RLDP to address, and no additional allowance will be made in the housing supply level of provision set out in the Preferred Strategy.

3.8 Empty Homes

3.8.1 The LHMA shows that according to Council Tax data published by the WG, there were 1,060 long term empty properties in NPT in 2022. This roughly equates to one in every sixty homes (1.6%) and closely aligns with the average for Wales as a whole. The LHMA explains that there can be many reasons for a property to be empty, for instance if its owner has moved into a care home while wishing to retain their family home, or if it is being substantially renovated. The Council is nonetheless understood to have been focusing on returning empty properties to use over recent years, and in this context it is notable that the number of long-term empty properties has declined in each of the last five years with a particularly sharp

fall of 15% over the last year alone. While Wales also saw a relatively pronounced fall last year, it has also seen increases in the number of long-term empty properties in two of the past five years.

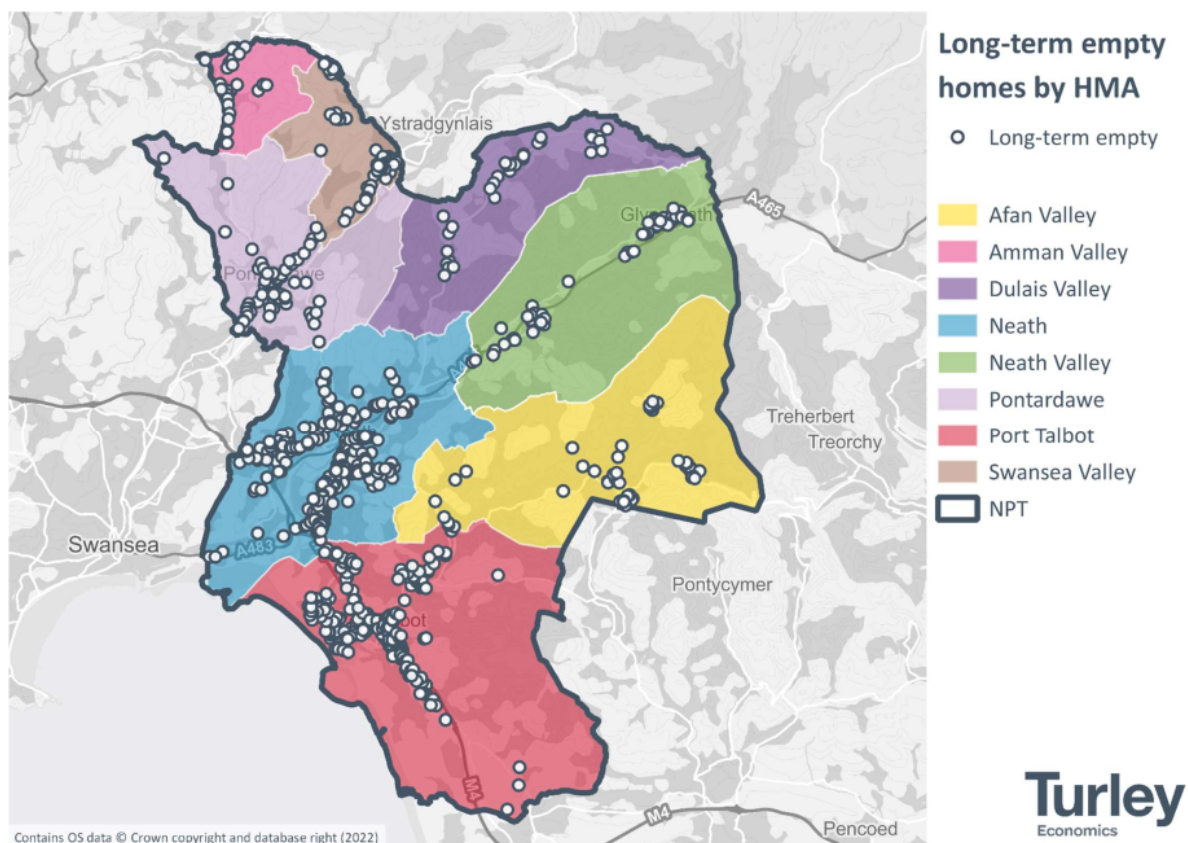
Figure 3.4 Figure 3.23 LHMA Indexed Change in Number of Empty Homes (2017-22)



Source: Welsh Government

3.8.2 In the LHMA, further Council data shows the precise location of the 1,131 long-term empty properties that it recorded in June 2022. The figure below demonstrates how they are distributed between all eight HMAs and clustered around the road network.

Map 3.3 Figure 3.24 LHMA Location of Long-term Empty Homes by HMA (June 2022)



Source: Council monitoring

3.8.3 Analysis provided in the LHMA shows that Neath and Port Talbot reportedly have the most long-term empty homes, in absolute terms, but it is of note that these areas also have the fewest when measured as a proportion of their dwelling stock in 2011. Swansea Valley is implied to have the most long-term vacant homes when measuring in this way, followed by Afan Valley.

3.8.4 The EHGA details how numbers of households have been converted into dwellings using a vacancy rate of 2.5% to allow for the churn of stock, empty homes and second homes. Given that the percentage of empty homes in NPT aligns closely with the national average, no additional allowance above the vacancy rate has been factored in.

3.9 Gypsy and Traveller Accommodation Needs

3.9.1 The Council prepared a Gypsy and Traveller Accommodation Assessment (GTAA) in accordance with the part 3 of the Housing (Wales) Act 2014 during the course of 2021. The GTAA was submitted in 2022 and following WG approval, was published in June 2024. The GTAA (2022) identified a need for 0 pitches in the short term and 10 pitches in the long term. Further more, no need for transit site provision or temporary stopping places was identified.

3.9.2 During the first Call for Candidate Sites in 2022, one site was submitted for Gypsy and Traveller pitch provision. This site has been subject to candidate sites assessment in accordance with the methodology and is included within the Candidate Sites Register. An internal working group has been established to explore how the Gypsy and Traveller pitch needs identified by the GTAA 2022 will be met in the future.

4 Key Issues

4. Key Issues

4.0.1 Housing is integral to many aspects of planning whether that be linked to the health and well-being of our population, a key element of a vibrant and sustainable place or ensuring that it is delivered in a way which doesn't contribute in a negative way to the climate and nature emergencies.

4.0.2 The Key Issues, Vision and Objectives (KIVO) Background Paper explains how the key issues were developed for the RLDP. A range of issues and topics have been identified following a review of evidence and stakeholder engagement and are arranged in groupings that follow the structure of Planning Policy Wales including; Strategic and Spatial Choices, Active and Social Places, Productive and Enterprising Places and Distinctive and Natural Places. The KIVO background paper explains the process for identifying key issues, challenges or drivers that will need to be addressed by the RLDP which involved comparing, assessing/amending and synthesising the issues identified in existing NPT plans and strategies together with 6 other matters including using the Key Issues from the adopted LDP as a starting point for the review.

4.0.3 14 new key issues for the RLDP have been identified and need to be addressed. The following key issues are those considered to closely link to population and housing:

4.0.4 Overarching Issues:

- **NKI 1 Climate Emergency:** Action to tackle the causes of increasing climate instability and to address its current and future impacts has now become urgent.
- **NKI 2 Nature Emergency:** Addressing the local and global decline in biodiversity has become urgent. All public authorities are required to seek to maintain and enhance biodiversity and promote the resilience of ecosystems to ensure a net biodiversity benefit from all new development.
- **NKI 3 Health and Well-being:** NPT has an ageing population and one of the least healthy diets and lowest levels of physical activity in Wales resulting in increasing rates of obesity and ill health.

4.0.5 Strategic and Spatial Choices:

- **NKI 4 Strategic Placemaking:** The majority of NPT's population, economic and cultural activity, significant infrastructure, and facilities are located in the coastal belt, resulting in geographical inequalities in well-being to the detriment of inland and valleys areas.
- **NKI 5 Placemaking in Action:** There has been a perceived loss of natural, cultural and built heritage and character, including the use of the Welsh language, across NPT's communities, natural environment and landscapes, coupled with a loss of role and purpose for many valleys communities.

4.0.6 Active and Social Places:

- **NKI 7 Living:** The need for additional homes of all types, including affordable housing and provision for Gypsies and Travellers, must be addressed.

5. Vision

5.0.1 As explained in the KIVO background paper, the Vision for the RLDP needs to set out our aspirations for the county borough and expectations for how change and development should be accommodated over the plan period. The draft vision has been influenced by and aligns to the visions set out in other relevant plans and strategies. It includes 14 different aspects, aspect 7 of which is the most relevant to population and housing and is set out below:

By 2038 Neath Port Talbot will be a place where:

7. The need for homes of all types across the county borough is being addressed.

Measures to enable and encourage new homes in sustainable locations will be addressing housing needs.

5.0.2 The vision together with the objectives will seek to address the key issues identified.

6. Topic Objectives

6.0.1 The RLDP's new objectives are intended to set out that the plan is aiming to achieve in respect of each of the topics, in order to meet the outcomes contained in the draft vision. The following are the resulting RLDP new objectives that will steer the overall direction and approach of the RLDP, in relation to development of all the detailed proposals and policies in regards to Population and housing:

NO1. Minimise the causes and adapt to the current and predicted impacts of climate change through:

- Minimising greenhouse gas emissions;
- Requiring appropriate location and design of development; and
- The protection and enhancement of all environmental assets required for climate adaptation and resilience.

NO2: Achieve a net biodiversity benefit and enhanced ecosystems resilience from new developments across the county borough.

NO3: Ensure all new developments provide a healthy local environment that encourages more active and healthier lifestyles for all age groups.

NO4: Realise the full benefits of green economic growth across the county borough to provide fully sustainable communities in all localities while conserving Neath Port Talbot's environment.

NO5: Support, enhance and enrich the distinctiveness of Neath Port Talbot's communities, including use of the Welsh language, through positive placemaking actions at a local level.

NO7: Deliver sufficient good quality new homes of the required types in the most suitable locations to meet the identified need.

6.0.2 The draft objectives seek to ensure that sustainable development is delivered which appropriately balances social, economic, environmental and cultural considerations.

7. Draft Strategic Policy

7.0.1 The Plans Preferred Strategy is called 'Aiding economic recovery and valuing our unique opportunities in Neath Port Talbot' and is summarised below:

Over the RLDP's plan period, this will mean:

- Making provision for 4,176 homes (including 20% flexibility allowance) (278 per annum) to meet a need of 3,480 homes; and
- Supporting the delivery of 3,555 jobs (237 per annum) and making provision for 57Ha of employment land.

7.0.2 The preferred level of growth aligns to the Employment-led supplementary adjusted growth scenario which was developed in the EHGA and is set out in section 3 of this paper. It includes a 20% flexibility allowance, the justification for which is set out later in this section.

7.0.3 In terms of spatial distribution, NPT is divided into two strategy areas:

- The Valleys Opportunity Area (encompassing the spatial areas of the Afan Valley, Neath Valley, Dulais Valley, Swansea Valley, Amman Valley and Pontardawe, and
- The Coastal Corridor and National Growth Area (comprising of Neath and Port Talbot spatial areas)

7.0.4 A Settlement Hierarchy has also been developed, further detail upon which is provided in the Settlement Assessment Background Paper. The spatial elements of the Preferred Strategy are presented in the Key Diagram.

7.0.5 The level of growth and spatial distribution have been informed by a suite of background evidence base documents which includes this paper and takes into account the following:

- Identification of Port Talbot and Neath in the Swansea Bay and Llanelli National Growth Area (as set out in Future Wales)
- Tata steelworks transition to the Electric Arc Furnace
- Celtic Freeport designation
- Significant environmental constraints
- Planned developments across the authority

7.0.6 The housing growth element of the the plan's strategy is then re-iterated in Strategy Policy SP8 Housing which is set out below:

SP8 Housing

A range of accommodation needs will be addressed through the following measures:

1. Identifying a Housing Requirement:

a. To meet housing needs of the economic recovery strategy for 3,480 dwellings will be met through the provision of 4,176 dwellings between 2023-2038 including a 20% flexibility allowance.

2. Identifying an Affordable Housing Target.

3. To deliver affordable homes by:

a. Setting thresholds and targets requiring housing developments to contribute to affordable housing provision; and

b. Providing a framework for considering proposals for affordable housing exception sites

4. Meeting Gypsy and Traveller accommodation needs by:

a. The allocation of site(s); and

b. Providing a framework for considering proposals for Gypsy and Traveller sites.

RLDP Objective: NO7

Housing Requirement

7.0.7 Provision will be made for approximately 4,176 dwellings (278 per year) in the Plan period 2023-2038, to enable delivery of a housing requirement for 3,480 dwellings (232 per year). The housing provision includes a 20% flexibility allowance to allow for sites not coming forward as anticipated. Sufficient residential land will therefore be made available to meet the future needs of communities for market housing and to contribute towards meeting the need for affordable housing.

7.0.8 Detailed analysis in relation to the housing requirement is set out in the Economic and Housing Growth Assessment (EHGA). This includes the assumptions made when converting the projected population growth into households and dwellings. The dwelling requirement has therefore been calculated using a vacancy rate of 2.5% which allows for the churn of stock, empty homes and second homes.

7.0.9 The housing requirement has also been calculated using a household membership rate adjustment.

7.0.10 The EHGA along with the Growth and Spatial Options Paper reviewed a number of different past build rates.

7.0.11 New homes will be developed mainly on land allocated specifically for housing and in sustainable locations within defined Settlement Boundaries, with care taken to protect and enhance the natural and built environment. The development management policies that will be drafted for inclusion in the Deposit Plan will include criteria to ensure that proposals deliver good quality new homes, a mix of housing tenures, types and sizes of homes in the most suitable locations in accordance with identified needs in the Council's latest LHMA.

7.1 Flexibility Allowance

7.1.1 As referenced in the DPM, it acknowledges that "there may be instances where site specific circumstances, unknown at the plan making stage, delay the delivery of sites" and "a development plan will not be effective if it cannot accommodate changing circumstances" (WG,2020, para 5.59). As such, a flexibility allowance has been embedded into the Plan as detailed further in this paper. An appropriate allowance has been specified following assessment of each component of housing supply to ensure "there is sufficient flexibility above the housing requirement to account for non-delivery and unforeseen issues, demonstrating delivery of the Anticipated Annual Build Rate (AABR) throughout the plan period".

7.1.2 An allowance for 696 residential units above the housing need of 3,480 homes is identified in order to allow for choice, flexibility and renewal of the existing housing stock and for non-delivery of sites within anticipated timescales. As sites are brought forward, often time delays arise for a variety of reasons, and this allowance provides a buffer for these

circumstances of the plan period. 696 units represents a 20% additional allowance which is referred to as the flexibility allowance. This level of flexibility has been carefully considered and is considered to be an appropriate allowance given the evidence of previous housing under-delivery within the County Borough. Past delivery rates are set out earlier in this paper and were considered in detail in the Growth and Spatial Options Background Paper, and the EHGA.

7.1.3 The flexibility allowance of 20% has been included within Table 8.6.1 and will be included in the Housing Trajectory, to be embedded in the RLDP. This recognises the fact that there may be certain specific circumstances, unknown at the plan making stage, that delay the delivery of sites, notwithstanding the robust frontloading of site delivery evidence. It adds an extra contingency to absorb issues with site delivery due to unforeseen circumstances or to respond to changing housing needs or newly arising specialist housing needs during the plan period. This flexibility allowance has been chosen to enable the RLDP's housing requirement to remain deliverable if a significant unforeseen scenario, such as delays to several key sites should occur. Given the extent and robustness of evidence underpinning each proposed allocation, 20% is considered sufficient to ensure the Anticipated Annual Build Rate (AABR) will remain deliverable throughout the plan period.

8 Components of Housing Supply

8. Components of Housing Supply

8.0.1 The RLDP has a strategic role in relation to housing delivery. As required by PPW the RLDP must ensure an adequate and continuing supply of deliverable housing to meet the identified requirement throughout the plan period. This section of the paper has been produced to identify, explain and justify the components of housing supply to meet the housing requirement over the lifetime of the Plan.

8.0.2 There are several housing supply components, which must be assessed in combination to inform delivery of the housing requirement. All housing supply components included in this paper and resultant trajectory, have the same base date, which is 1st April 2023. The components include:

- **Dwelling Completions (to date)**

8.0.3 All residential completions since the start of the RLDP period, split by large sites (10 or more units) and small sites (under 10 units) for clarity of presentation and analysis. The Council has used building control information, council tax information and information submitted by landowners/ developers to identify housing completions.

- **Dwellings Under Construction**

8.0.4 All residential units under construction are checked and where required, surveyed annually. The Council has used building control information, council tax information and information submitted by landowners/ developers to identify units under construction.

- **Land Bank Commitments (units with planning permission)**

8.0.5 All residential applications with planning consent in place that have commenced development or are due to commence development in the short term. This component is split between large and small sites.

- **Windfall Sites**

8.0.6 Windfall sites are not specifically allocated for housing yet come forward in accordance with the Plan. The large and small windfall site allowances have been calculated based on past delivery over the entirety of the existing LDP period and further analysis to remove anomalous data.

- **New Housing Allocations**

8.0.7 New sites for residential development that have been submitted as candidate/urban capacity sites, are supported by robust deliverability and viability information and have been subject to a rigorous Candidate Site Assessment.

8.0.8 This component also includes some allocations from the existing LDP that have been rolled forward because there has been a substantial change in circumstance to demonstrate that these sites can be delivered. Such sites were submitted as candidate sites or identified as urban capacity sites and have supplied deliverability information. All potential rollover sites were subject to the same candidate site process requirement as new sites i.e they had to demonstrate their sustainability, viability and deliverability credentials to re-justify their inclusion in the RLDP.

8.0.9 Each component of housing supply will now be outlined in turn, before detailing how these components will enable the development of a housing trajectory for inclusion in the Deposit Draft Plan.

8.1 Dwelling Completions

8.1.1 The RLDP requires 4,176 new dwellings to be accommodated in the County Borough during the 15 year RLDP period from 2023-2038. So far 100 net dwelling units have already been delivered since the plan base date in 2023.

8.2 Dwellings Under Construction

8.2.1 Dwellings under construction need to be included as a component of the housing supply, as these units are not captured by other components and make a contribution towards completions in the first few years of the plan period. This data is recorded as part of the Council's annual Housing Delivery Assessment with a breakdown between units recorded as being newly under construction and those recorded as being under construction from a previous annual survey. The results for 2023/24 showed a high level of results recorded as under construction from a previous survey. This suggested that work had commenced on site but construction had paused or become dormant. Whilst the DPM advises to include all units under construction as surveyed, it was considered that this would give an overinflated figure as some of these sites may not deliver any completions over the plan period. The table below shows raw data collected by the housing survey for 2023/24.

Table 8.2.1 Dwellings Under Construction (as surveyed in 2023/24)

Total Units Under Construction	Total Open Market Units Under Construction	Total Affordable Units Under Construction	Open Market Units Under Construction recorded by a previous survey	Open Market Units Under Construction First Recorded in 2023/24	Affordable Units Under Construction recorded by a previous survey	Affordable Units Under Construction First Recorded in 2023/24
616	296	320	265	31	320	0

8.2.2 This indicates a number of stalled sites where construction has technically started, however they have not been brought forward. Further analysis will therefore be undertaken to identify a realistic number of units which are genuinely under construction to be included within the housing trajectory at Deposit Plan stage.

8.3 Land Bank Commitments

8.3.1 Land Bank Commitments include all residential applications with planning consent in place that have commenced development or are due to commence development in the short-term as at the 31st March 2023. The starting point for this component of housing supply was the 2023 Housing Trajectory, updated to take account of the more recent completions data (outlined in the previous section), new sites granted planning permission and analysis into whether the sites previously included in the trajectory have progressed as anticipated.

8.3.2 After considering all sites that demonstrate a high prospect of short term delivery, a total of 600 dwellings are considered Land Bank Commitments, a number of which are already under construction. All dwellings within this total stem from sites that have commenced or are shortly due to commence development.

Table 8.3.1 Land Bank Commitments (Units with Planning Permission)

Year	Actual 23/24	Forecasted 24/25	Forecasted 25/26	Forecasted 26/27	Forecasted 27/28	Forecasted 28/29	Forecasted 29/30	Forecasted 2030-2038
Dwelling Completions	100	121	189	158	88	40	4	0

8 Components of Housing Supply

8.4 Large and Small Windfall

8.4.1 The adopted NPT LDP includes a windfall allowance of 825 residential units over the Plan period which is the equivalent of 52 residential units per annum.

8.4.2 Given the slower pace of delivery than expected in the Plan period to date, as part of the preparation of the housing trajectory, the Council has reviewed the annual windfall delivery since the beginning of the Plan period. This shows that on average there have been 39 dwellings per annum from windfall sites.

Table 8.4.1 Dwelling Completions on Windfall Sites

Monitoring period	Number of Completions on Windfall sites
2011/12	51
2012/13	3
2013/14	13
2014/15	27
2015/16	27
2016/17	34
2017/18	0
2018/19	110
2019/20	36
2020/21	16
2021/22	78
2022/23	65
2023/24	52
Average number of completions on windfall sites	39

8.4.3 The Council has also reviewed the average number of dwellings permitted on windfall sites over the Plan period. The table below shows that on average 56 residential units have been permitted on windfall sites to date. Within recent years there have been higher numbers largely due to RSL windfall schemes. Within the last twelve months there have been fewer of such schemes granted as a number are currently under construction.

Table 8.4.2 Permitted Units on Windfall Sites

Monitoring period	Number of permitted units on windfall sites
2011/12	20
2012/13	60
2013/14	25
2014/15	34
2015/16	64
2016/17	61
2017/18	0
2018/19	83
2019/20	56
2020/21	130
2021/22	67
2022/23	59

Monitoring period	Number of permitted units on windfall sites
2023/24	72
Average number of permitted units on windfall sites	56

8.4.4 In setting the windfall allowances, both the number of units permitted and completed have been taken into consideration. Generally, more units are permitted than completed on an annual basis. This is because it can take time for developments to come forward and not all permitted units will be brought forward, some permissions will lapse. Taking into consideration the findings of the tables above, the Council has included a windfall allowance of 35 residential units per annum in the trajectory. This is line with the agreed assumption according to the housing trajectory stakeholder group for the adopted LDP.

8.4.5 To avoid double counting, given that we will add committed windfall sites to the trajectory as part of the landbank, in accordance with the recommendation provided in Paragraph 5.3 of the DPM, a windfall allowance for the first two years of the housing trajectory will not be included.

Small Sites Allowance

8.4.6 Small sites (with a capacity of less than 10 residential units, comprising undeveloped land and small windfall sites) can make a significant contribution to housing provision.

8.4.7 The table shows that since the beginning of the Plan period, there has been an average of 45 completions on small sites per annum.

Table 8.4.3 Dwelling Completions on Small Sites

Monitoring period	Number of Completions on small sites
2011/12	56
2012/13	56
2013/14	58
2014/15	47
2015/16	52
2016/17	38
2017/18	49
2018/19	62
2019/20	15
2020/21	48
2021/22	45
2022/23	36
2023/24	20
Average number of Completions on small sites	45

Large Windfall

8.4.8 Large Windfall sites are sites with a capacity of 10 or more residential dwellings that are not specifically allocated for housing, yet come forward in accordance with the plan. Assessing the likely contribution that such sites can make to the housing land supply begins with considering the sites that have come forward under existing LDP policies in recent years. Given the very nature of windfall sites, it is considered most realistic to monitor the total

8 Components of Housing Supply

number of units completed annually to establish trends and provide a realistic estimate of the likely contribution Windfall Sites may make to the land supply. Table 8.4.4 shows the Large Windfall Site completions during the RLDP period's 1st monitoring year (2023/24).

Table 8.4.4 Dwelling Completions on Large Windfall Sites during the RLDP Period to Date

Monitoring period	Number of residential unit completions on large windfall sites
2023/24	107

8.4.9 Further work will be undertaken in order to determine an appropriate windfall allowance for large and small sites for the Deposit Draft Plan. This will include considering a range of sources of delivery including demolitions, estate renewal, sub-division, unit mergers and changes of use.

8.5 New Housing Allocations

8.5.1 At Preferred Strategy stage, only key sites are identified. The key sites which are anticipated to include housing provision are listed below:

- Coed Hirwaun, Margam (400 units estimated within the plan period)
- Land East of Rhos (400 units estimated within the plan period)
- Land adjacent to Blaenbaglan (341 units estimated within the plan period)
- Fforest Farm, Aberdulais (250 units estimated within the plan period)

8.5.2 Together, the key sites identified could deliver approximately 1,391 dwellings.

8.5.3 Having considered the other components of housing supply, it is anticipated that in total 2,561 units will need to be provided through new housing allocations. Therefore in addition to the key sites, allocations for a further 1,170 dwelling will need to be identified on sites across the County Borough. The distribution of potential new site allocations is provided later in this paper.

8.5.4 The Candidate Sites Register (CSR) provides a summary of the candidate sites assessment of the sites submitted to date. Further detail on new housing allocations will be provided in the Deposit Plan following finalisation of the candidate sites assessment.

8.6 Total Components of Housing Supply

8.6.1 The components of housing supply over the RLDP period (2023-2038) are set out in the table below:

Table 8.6.1 Components of the Housing Requirement

Element	Component of Housing Supply	No. Housing Units
A	Total completions (small & large)	100
B	Units with planning permission (large sites)	405
C	Units with planning permission (small sites)	195
D	New housing allocations	2,561
E	Large windfall sites (10+ units)	420
F	Small windfall sites	495
G	Total Housing Provision	4,176

10. Housing Distribution

Windfall Spatial Distribution

9.0.1 The DPM requires all components of housing supply (including large windfall and small windfall sites) to be numerically attributed to each tier of the settlement hierarchy. As these particular components are not, by their very nature, attributable to specific housing allocations within the plan, an estimation is required to this end. The results of this exercise are outlined in the Table 9.0.1 below:

Table 9.0.1 Estimated Spatial Distribution of Large and Small Windfall Sites

Tier	Percentage of Total Windfall	Large Windfall Site Estimated Distribution (Dwellings)	Small Windfall Site Estimated Distribution (Dwellings)	Average number of units per settlement
Principal Centres x3	46% (425)	210	215	142
Key Settlements x8	24% (215)	105	110	27
Local Settlements x16	23% (210)	105	105	13
Villages x15	5% (45)	0	45	3
Minor Settlements x9	2% (20)	0	20	2
Total (x51)	100% (915)	420	495	18

9.0.2 The above table helps provide more certainty regarding the spatial distribution of potential large and small windfall sites, whilst acknowledging that these sites may come forward through slightly different proportionate weightings in practice. The proposed distribution set out above suggests that the windfall component of the housing supply is in alignment with the plan strategy where the majority of growth would be brought forward within the top tiers of the settlement hierarchy.

Landbank Permissions Distribution

9.0.3 According to the Council's monitoring, there were 600 units with planning permission to be developed during the remaining 14 years of the plan period from 2024/25 onwards. The distribution of these units across the tiers of the settlement hierarchy is set out in the table below.

Table 9.0.2 Distribution of Landbank Permissions

Settlement Hierarchy Tier	Percentage split	Number of units with planning permission
1. Principal Centres	56%	333
2. Key Settlements	24%	145
3. Local Settlements	12%	71
4. Villages	8%	46
5. Minor Settlements	0%	2
Open Countryside	1%	3
Total	100%	600

9.0.4 The distribution of these units with planning permission on both large and small sites supports the settlement hierarchy by demonstrating that the majority of growth will be delivered within the highest tier of the hierarchy and this cascades down to the lowest tier of the hierarchy.

9 Housing Distribution

Estimated New Allocations distribution

9.0.5 The Council has assessed all candidate sites received as part of the two calls for candidate sites and the urban capacity study. Following this initial assessment, it is confident that it can make sufficient provision for housing within the plan which will be contributed to by the allocation of new sites. The distribution of sites which have passed stage 1 and 2 of the sites assessment process is summarised below. However, this will be subject to future change after further assessment of sites following updated viability and constraints information to inform the Deposit Draft Plan. The percentage distributions in the table below therefore only provide an indicative picture of the likely distribution of new allocations across the hierarchy and include the key sites proposed in the Preferred Strategy.

Table 9.0.3 Estimated Distribution of New Allocations

Settlement Hierarchy Tier	Percentage split
1. Principal Centres	42.8%
2. Key Settlements	32.7%
3. Local Settlements	21.7%
4. Villages	2.8%
5. Minor Settlements	0%
Total	100%

9.0.6 The research undertaken to inform the table above confirms that there is sufficient housing land suitable for allocation in accordance with the settlement hierarchy. It shows the most new allocations being identified in the Principal Centres, and the least in the villages, with none in the minor settlements proposed.

9.0.7 All of the above information is emerging and will be subject to change dependant on the final outcomes of candidate site assessments, any new planning permissions and updated information on the numbers of units under construction and complete as of the 31st March 2025. This information will therefore be updated and pulled together to form an accurate housing trajectory in the Deposit Draft Plan.

9. Affordable Housing

10.0.1 The RLDP's strategy fully recognises the need to contribute towards meeting the County Borough's affordable housing needs and the importance setting an affordable housing target, as set out in strategic policy SP8. The plan will include an affordable housing target which is both ambitious and deliverable following consideration of a number of factors.

10.0.2 The affordability of housing within NPT is considered in detail in section 3 of the EHGA. The analysis looks at average house prices over time and geographically by postcode. It shows that although NPT has the lowest average house prices in the wider region, house prices have continued to rise over the adopted LDP period to date. Section 4 of the EHGA considers the relationship between earnings and house prices and shows that affordability continues to be an issue affecting many households.

10.0.3 The County Borough's housing needs are set out in the LHMA draft 2023 which identifies a backlog of affordable housing need of 542 dwelling per annum to be met over the first 5 years of the LHMA period, and a newly arising affordable housing need of 66 dwellings per annum. Together, the market and affordable housing needs over the 15 year period equate to 4,445 homes. This is unachievable when considered against growth scenario 4. Average past 15 year Delivery rate which would yield approximately 238 dwellings per annum and 3927 homes over the RLDP period including 10% flexibility allowance. The need for Affordable Housing in NPT is so high that it is considered too great a number on which to directly set the affordable housing target upon in the plan.

10.0.4 Following consultation on the Preferred Strategy and when the proposed level of housing growth is confirmed, the LHMA will be reviewed to consider the level of housing need associated with the level of growth being planned for. Detail of this further work will be provided at Deposit Plan stage.

10.0.5 The scale of affordable housing needed in NPT is greater than can be provided through current levels of Welsh Government Social Housing Grant. The planning system, through the use of planning obligations, can contribute towards the provision of affordable housing and this provision alongside provision through Social Housing Grant will be considered to inform the setting of a target figure.

10.0.6 As part of the evidence base for the deliverability of sites, site specific viability appraisals have been undertaken, informed by assumptions agreed with stakeholders. The High Level Viability Study (HLVS) has considered broad percentages of affordable housing that could be achieved on sites. This testing considered a range of percentages of affordable housing starting at 100% and working down to 0%, alongside other variables on notional sites. Whilst the HLVS found a few potential sites could deliver up to a maximum of 40% affordable housing, many potential sites would not be viable with any affordable housing policy requirements, and the assumptions that feed into this study are continuing to change.

10.0.7 Scenario test 20 of the HLVS looked at notional sites with 5 dwellings and 40% affordable housing and concluded that:

- All testing scenarios for Pontardawe, Neath and Dulais Valleys, Swansea and Amman Valleys, and Afan Valley are unviable.
- Scenarios for Port Talbot and Neath are viable at a 15% profit level for all densities and viable at a 18% profit level for all densities. Scenarios for Port Talbot are viable at a 20% profit level at a density of 40dph. Scenarios for Neath are viable at a 20% profit

10 Affordable Housing

level at a density of 45dph. Schemes are currently raising viability concerns with regards to a requirement of 25% affordable housing in these areas, therefore there are questions as to the extent to which schemes in reality would be deliverable. Further work would need therefore to be undertaken ahead of the Deposit Plan.

10.0.8 Detailed site specific viability testing undertaken for Candidate and Urban Capacity Sites which passed the stage 1 assessment (as set out in the Candidate Sites Assessment Methodology) looked at levels of affordable housing in line with emerging findings of the HLVS which concluded that the following levels of affordable housing should be provided on sites of 10 or more units:

- Neath: 20%
- Port Talbot: 20%
- Pontardawe: 10%

10.0.9 As noted in the HLVS report, the viability testing work undertaken in the HLVS will need to be reviewed and re-run to inform the Deposit Plan to take into account changes in time, build costs and other assumptions.

10.0.10 The thresholds and percentage targets which will be required on different sites in different locations throughout the county borough. This will be further assessed and incorporated into an Affordable Housing policy in the Deposit Plan. Until the policy thresholds and targets have been set, it is therefore not possible to identify a realistic and deliverable affordable housing target.

10.0.11 The adopted LDP does not define an Affordable Housing Target, but does suggest in para 5.1.20 that of the 7,800 dwellings needed over the plan period, 1,200 of this will be affordable. This equates to roughly 15% of the homes needed and approximately 14% of the housing provision made in the plan. 15% of the housing requirement proposed (4,176 dwellings) would equate to 626 affordable dwellings. It will not be possible to fully consider whether this would be a realistic and achievable affordable housing target until a number of factors have been considered. The setting of the Affordable Housing Target to be included in the Deposit Plan will consider in detail the following:

- The numbers of affordable units which could be delivered solely through planning gain. This will be determined by the setting of the Affordable Housing policy thresholds and percentages and setting site specific indicative affordable housing targets for allocated housing sites.
- The numbers of affordable units which could be delivered through future anticipated grant funding streams including the Social Housing Grant (SHG) funding as set out in the Programme Delivery Plan (PDP), Recycled Capital Grant (RCG), the Temporary Accommodation Capital Programme (TACP) and any other grant funding streams which may be available in the area during the plan period.
- Past affordable housing delivery which is set out in section 2 of this paper;
- The potential for the delivery of affordable housing exception sites and affordable-led housing sites during the plan period.

11. Engagement

11.0.1 In developing the Preferred Strategy, the LDP team has engaged with other officers leading on various aspects of housing strategy. The team has contributed to meetings of the Council's Strategic Housing Partnership, particularly during the preparation of the LHMA. Within this forum it has been possible to keep abreast of the continually changing picture of the housing crisis being experienced within the County borough, as regular updates are provided by the Registered Social Landlords, the Housing options and homelessness team's and those leading on the various grant funding stream programmes, whether that be for housing adaptations, general or specialist housing development or temporary accommodation.

11.0.2 The Council has also undertaken extensive engagement with landowners, agents and the development industry through the Viability Topic Working Group, the Urban Capacity study and Housing Trajectory Stakeholder Group.

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