JOINT HOUSING LAND AVAILABILITY STUDY 2013

NEATH PORT TALBOT COUNTY BOROUGH COUNCIL

JOINT HOUSING LAND AVAILABILITY STUDY 2013

BETWEEN

NEATH PORT TALBOT COUNTY BOROUGH COUNCIL & THE STUDY GROUP

THE HOME BUILDERS FEDERATION
LINC CYMRU
ST.MODWEN DEVELOPMENTS
SAVILLS
FAMILY HOUSING ASSOCIATION
ENVIRONMENT AGENCY
GWALIA HOUSING ASSOCIATION
COASTAL DEVELOPMENT GROUP
LIBERTY PROPERTIES

January 2014

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1 SUMMARY

This is the Neath Port Talbot Joint Housing Land Availability Study for 2013 which presents the housing land supply for the area at the base date of 1st April 2013. It replaces the report for the previous base date of 2012.

The JHLAS has been prepared in accordance with the requirements of Planning Policy Wales, Technical Advice Note 1 (TAN 1) and the Guidance Note on the JHLAS process (2012). Please refer to these documents for details of the requirements for the maintenance of a five year housing land supply in each Local Planning Authority area and the process for undertaking the JHLASs.

This document can be accessed on the Welsh Government website using the following link

Welsh Government | Housing Land Availability in Wales

Section 2 sets out details of the housing land supply and how it has been calculated. It shows that based on the residual method of calculation as set out in TAN 1 Neath Port Talbot has 2.6 years housing land supply.

Involvement

The housing land supply has been assessed in consultation with members of the study group. The study group comprises:

NEATH PORT TALBOT COUNTY BOROUGH COUNCIL
THE HOME BUILDERS FEDERATION
LINC CYMRU
ST.MODWEN DEVELOPMENTS
SAVILLS
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Report production

Neath Port Talbot issued draft site schedules, site proformas and other additional information for consultation exercise with the study group during the summer of 2013.

As a consequence of this consultation period, representations were received from Savills (on behalf of St.Modwen) and HBF and Redrow Homes.

A Statement of Common Ground (SoCG) was subsequently prepared and, following consultation with members of the Study Group, was submitted to the Welsh Government in early October.

It was necessary for an appointed Planning Inspector to resolve a number of disputed matters because details within the site schedule and the appropriate method of calculation could not be agreed by all parties through the SoCG stage.

The appointed Planning Inspector subsequently made a recommendation to the Welsh Government on the housing land supply (Appendix 4), making recommendations on the points of dispute. The Planning Inspector's recommendations were considered and accepted by the Welsh Government.

In the light of these recommendations, amendments have been made to the site schedules by Neath Port Talbot and this information has been incorporated into this report.

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2 HOUSING LAND SUPPLY

The five year land supply comprises sites with planning permission (outline or full) and sites allocated for housing in adopted development plans, categorised as prescribed in TAN 1.

Large Site Supply

The land supply has been calculated using the residual methodology. See Appendix 4 for the Inspectors Report for the justification for the application of this method of calculation.

The following table outlines the number of housing units available on large housing sites.

Table 1 – Identified Housing Land Supply

Housing	Land Supply	(base da	ate to ba	se date _l	plus 5 ye	ears) -Lar	ge Sites			
	5 Year Land Supply (TAN 1 categories) Beyond 5 Years									
Proposed Homes	Under Construction	Cat.1	Cat.2	Cat. 2*	Cat 3(i)	Cat. 3(ii)	Completions Since Last Study			
6,535	150	162	1,129	0	5,094	0	243			

The following table outlines the five year land supply i.e. Categories 1, 2, 2* and under construction, by market sector.

Table 2 – 5 Year Land Supply & Market Sector – Large Sites

Private	1,262
Public	0
Housing Association	179
Total	1,441

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Small Site Supply

Small sites of less than 5 dwellings are calculated based on the completions for the last five years.

Table 3 - Small Site Completions For Previous 5 Years

	2008/09	2009/10	2010/11	2011/12	2012/13	Total
Completions	84	80	51	31	44	290

Total Land Supply

The overall total 5 year land supply (large & small sites) is 1,731 units.

Table 4 – Total 5 Year Land Supply

Category	Number of Units
Large Sites	1,441
Small Sites	290
Total	1,731

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Land Supply Calculation

The land supply is calculated by comparing the amount of land considered to be genuinely available with the remaining housing requirement in the adopted development plan, in this case the Neath Port Talbot Unitary Development.

Α	Total Housing Requirement	6,155
В	Total Completions to Base date	3,937
С	Residual Requirement (3 Years to 2016)	2,218
D	Extrapolated Requirement to 2018	1,106
Е	5 Year Requirement	3,324
F	Annual Need	665
G	Total 5 Year Land Supply	1,731
Н	Land Supply in Years (G/F)	2.6

3 COMMENTARY

The Inspector has concluded in line with the provisions set out in Technical Advice Note 1 that the housing land supply for Neath Port Talbot be calculated using the residual method. The land supply figure now stands at 2.6 years.

TAN 1 prescribes that in circumstances where the housing land supply falls below the required 5 year level, the local planning authority must include a statement outlining the measures it is taking to address the situation.

The Council acknowledges that the land supply is below the 5 year level. The shortfall amounts to 1,593 units. TAN1 outlines some of the measures that might be adopted by local authorities to increase the short term land supply. The land supply is currently assessed against the housing requirement within the Unitary Development Plan which was adopted in 2008 and runs until 2016.

The authority is however preparing the Local Development Plan and as an integral component of the LDP process, the authority has undertaken further work into the viability and deliverability of a number of sites currently assessed as part of the annual Joint Housing Land Availability Study. These sites were not considered during the 2013 JHLAS to be genuinely available in the short term and therefore they have not as yet made a contribution to the land supply. This additional information that has emerged since the 2013

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study will be considered as part of the 2014 JHLAS and the authority believes that this information will have a positive impact on the short term land supply.

Notwithstanding this, it is inevitable that additional land will be required and Neath Port Talbot CBC maintains that the most appropriate mechanism for identifying land for new housing remains the emerging Local Development Plan.

The LDP was placed on deposit in August 2013. It is expected that the Examination in Public will take place during 2014 with the plan adopted in 2015.

The Deposit LDP includes a number of sites allocated for residential development that have not been identified within any previous development plan. The majority of these new sites are essentially "greenfield" sites without significant physical constraints that would impede delivery of new housing.

In cumulative terms, theses sites amount to in excess of 1,000 potential plots. Whilst these sites cannot presently be included in any calculation of the short term land supply, their inclusion within an emerging LDP indicates the scale of new land that will be available for development when the LDP is adopted.

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4 MONITORING DATA

TAN 1 requires the JHLAS report to provide additional information on the development of land for housing covering the use of previously developed land, the use of sites subject to flood risk constraints and the type of housing being developed.

Previously Developed Land

The following table illustrates the total number and percentage of available and completed homes by category and land type.

Table 5 - Re-use of Previously Developed Land (Large Sites)

		5 Year	Supply	/	3i and 3 ii Categories					Completions			
Year	Gree	nfield	Brow	nfield	Gree	nfield	Brow	nfield	Gree	nfield	Brownfield		
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	
2011	591	36%	1032	64%	577	11%	4649	89%	115	32%	244	68%	
2012	598	37%	1024	63%	740	14%	4438	86%	133	58%	98	42%	
2013	378	26%	1063	74%	728	14%	4366	86%	129	53%	114	47%	
2014													
2015													
2016													

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Flood Risk

Table 6 - Sites Subject To Flood Risk Constraints (Large Sites Only)

	Тс	Total Number and Percentage of Homes by Category and Land Type											
Year		5 Year	Suppl	у	3i a	nd 3 ii 🛚	Categ	ories	Completions				
Teal		C1	(C2 C1 C2		2	С	1	(22			
	No.	%	No.	No. % No.		%	No.	%	No.	%	No.	%	
2011	0	0%	333	21%	0	0%	536	10%	0	0%	0	0%	
2012	0	0%	228	14%	0	0%	524	10%	0	0%	100	43%	
2013	0	0%	250	17%	0	0%	526	10%	0	0%	80	33 %	
2014													
2015													
2016													

Categories defined in TAN 15:

C1: Areas of floodplain which are developed and served by significant infrastructure, including flood defences. .

C2: Areas of floodplain without significant flood defence infrastructure.

Type of New Housing

Table 7 - Completions by House Type - 1 April 2012 to 31 March 2013

2011/12	Apartment	Houses	Total		
Number of Units	17	226	243		
Percentage	7%	93%	100%		

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Appendix 1 – Site Schedules

Site Location	Community	2012/13	Site Capacity	Remaining Units	U/C	13/14	14/15	15/16	16/17	17/18	Cat.3(i)	Comment
			GREATI	ER NEATH	HOUSI	NG ZO	NE					
Bwlch Road	Cimla	I	25	10	1	1	1	1	1	1	4	Under Construction
Tower Hotel	Jersey Marine	1	32	0	·						-	Site Complete
Ocean View	Jersey Marine		81	81	5	16	25	25	10			Under Construction
Barrons Court	Neath Abbey		107	15	1	2	3	3	3	3		Under Construction
Eaglesbush	Neath		50	50							50	
Old Road/Garthmor	Neath	8	40	18		5	6	7				Under Construction
The Barracks	Pontrhydyfen		44	44							44	
Area 1	Coed Darcy		195	130		10	20	30	35	35		Under Construction
Urban Village	Coed Darcy	3	4000	3997	11	60	100	125	125	125	3451	Under Construction
Crymlyn Grove	Skewen	21	175	95	13	7	25	25	25			Under Construction
Wern Goch	Skewen		50	50	2		29	19				Under Construction
Elba Crescent	Crymlyn Burrows		50	50							50	
Dan y Graig Road	Neath		10	10							10	
Cardonnel Road	Skewen		16	16							16	
	•		•	•	•		•		•			•
		NE	ATH & DU	LAIS VALL	EYS H	OUSIN	G ZON	E				
Wembley Avenue	Banwen		10	10							10	
Heol Las Fawr	Crynant		34	8	1	1	1	1	1		3	Under Construction
Empire Avenue	Cwmgwrach		18	18							18	
Heol Y Glyn	Glynneath		81	81							81	
Park Avenue	Glynneath		60	60							60	
Welfare Hall	Glynneath		17	17					9	8		
Ynys Y Nos Avenue	Pontwalby		24	11	4	2	5					Under Construction
Heol Y Waun	Seven Sisters		68	68							68	
Glyn Dulais	Crynant		21	21					10	11		
			NORTH	ERN LLIW	HOUSI	NG ZO	NE					
Glyn Mynydd	Godrergraig	31	116	4	4							Under Construction
Graignewydd(TaylorWimpey)	Godrergraig		56	56		10	25	21				
Graignewydd (Barratts)	Godrergraig	15	50									Site Complete
Bryn Morgrug	Alltwen	15	71	41	15	10	16					Under Construction
Thomas Street	Pontardawe		10	3							3	
Waun Sterw	Rhydyfro		40	40							40	
			PORT	TALBOT H	OUSIN	g zon	E	1		1		
Thorney Road	Baglan	3	56	7	1	1	5					Under Construction
Afan Way	Baglan Moors	9	129	4								Under Construction
R/o Baglan School	Baglan		110	110							110	
Stycyllwen	Baglan		88	24	7	2	4	4	4	3		Under Construction
Maesteg Road	Bryn		40	40							40	
Copperminers	Cwmafan	19	120	54	17	13	24					Under Construction
Forest Lodge Lane	Cwmafan	2	15	12			2	2	2	2	4	Under Construction
	Goytre		44	44							44	
	Aberafan		102	102							102	
Goytre Road Tir Morfa									10	50	380	
Tir Morfa Baglan Bay	Sandfields		440	440								
Tir Morfa Baglan Bay Groeswen, Margam	Sandfields Margam	25	100								_	Site Complete
Tir Morfa Baglan Bay Groeswen, Margam Ocean Way	Sandfields Margam Aberafan	25	100 26	26							26	Site Complete
Tir Morfa Baglan Bay Groeswen, Margam Ocean Way Tywyn School	Sandfields Margam Aberafan Aberafan	25	100 26 75	26 75							75	Site Complete
Tir Morfa Baglan Bay Groeswen, Margam Ocean Way Tywyn School Port Talbot Docks	Sandfields Margam Aberafan Aberafan Port Talbot	25	100 26 75 50	26 75 50							75 50	Site Complete
Tir Morfa Baglan Bay Groeswen, Margam Ocean Way Tywyn School Port Talbot Docks Blaen Baglan Farm	Sandfields Margam Aberafan Aberafan Port Talbot Baglan	25	100 26 75 50 219	26 75 50 219							75 50 219	
Tir Morfa Baglan Bay Groeswen, Margam Ocean Way Tywyn School Port Talbot Docks Blaen Baglan Farm	Sandfields Margam Aberafan Aberafan Port Talbot	25	100 26 75 50	26 75 50	1		2	2	2	2	75 50	
Fir Morfa Baglan Bay Groeswen, Margam Docean Way Fywyn School Port Talbot Docks Blaen Baglan Farm	Sandfields Margam Aberafan Aberafan Port Talbot Baglan	25	100 26 75 50 219 25	26 75 50 219 25	•	G ZON		2	2	2	75 50 219	
Tir Morfa Baglan Bay Groeswen, Margam Ocean Way Tywyn School Port Talbot Docks Blaen Baglan Farm Farteg Fawr	Sandfields Margam Aberafan Aberafan Port Talbot Baglan Bryn	25	100 26 75 50 219 25	26 75 50 219 25	•	G ZON		2	2	2	75 50 219 16	Site Complete Under Construction
Tir Morfa Baglan Bay Groeswen, Margam Ocean Way Tywyn School Port Talbot Docks Blaen Baglan Farm Farteg Fawr	Sandfields Margam Aberafan Aberafan Port Talbot Baglan Bryn	25	100 26 75 50 219 25 AFAN	26 75 50 219 25 VALLEY H	•	G ZON		2	2	2	75 50 219 16	
Fir Morfa Baglan Bay Broeswen, Margam Docean Way Tywyn School Port Talbot Docks Blaen Baglan Farm Farteg Fawr	Sandfields Margam Aberafan Aberafan Port Talbot Baglan Bryn	25	100 26 75 50 219 25	26 75 50 219 25	•	G ZON		2	2	2	75 50 219 16	

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Site Location	Community	Complete 2012/13	Site Capacity	Remaining Units	U/C	13/14	14/15	15/16	16/17	17/18	Cat.3(i)	Comment
			GRE	ATER NEA	тн но	USING	ZONE					
86-100,Briton Ferry Road	Neath	25	28	3			3					Under Construction
Hillside, Groves Road	Neath	19	60	41				20	21			Part Complete
The Ropewalk	Neath		12	12	12							Under Construction
NEATH & DULAIS VALLEYS HOUSING ZONE												
Maes Marchog	Banwen	16	16									Site Complete
			NOR	THERN LL	IW HO	JSING	ZONE					
Former Cwmtawe School	Pontardawe	16	81	65	5	10	20	20	10			Under Construction
Glanyrafon Phase 2	Pontardawe	15	15									Site Complete
Amman Road	Brynamman		12	12		12						
			PO	RT TALBO	T HOU	SING Z	ONE					
Royal Buildings	Port Talbot		46	46	46							Under Construction

NB: There are no sites identified within categories 2* or 3(ii).

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Appendix 2 – Past Completions Data

	Number of Homes Completed On						
Year	Large Sites	Small Sites	Total Completions				
2001/02	354	44	398				
2002/03	316	51	367				
2003/04	267	72	339				
2004/05	264	81	345				
2005/06	248	93	341				
2006/07	242	50	292				
2007/08	215	78	293				
2008/09	201	84	285				
2009/10	238	80	318				
2010/11	359	51	410				
2011/12	231	31	262				
2012/13	243	44	287				

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Appendix 3 – Previous Land Supply Data

Year	5 year supply -Number of homes			Number of years supply	Supply beyond 5 years – Number of homes	
	_ Cat.1	Cat.2	Cat.2*		3(i)	3(ii)
20007	350	892	111	5.0	1337	86
2008	337	1591	10	4.9	3591	0
2009	289	1643	10	4.7	5777	0
2010	409	1666	10	4.7	5287	0
2011	334	1289	0	5.8	5226	0
2012	319	1,303	0	6.0	5,178	0
2013	312	1,129	0	2.6	5,094	0

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Appendix 4 - Inspectors Recommendation Report



Argymhelliad i Lywodraeth Recommendation to Welsh Cymru ar Gyd-astudiaeth Argaeledd Tir ar gyfer Tai

Government on Joint Housing Land Availability Study

gan Alwyn B Nixon BSc(Hons) MRTPI Arolygydd a benodir gan Weinidogion Cymru Dyddiad: 11/11/2013

by Alwyn B Nixon BSc(Hons) MRTPI an Inspector appointed by the Welsh Ministers Date: 11/11/2013

Ref: APP/Y6930/JHLAS/13/515836 Local Planning Authority: Neath Port Talbot County Borough Council

- This report concerns the Neath Port Talbot Joint Housing Land Availability Study (JHLAS) 2013.
- The matters in dispute are set out in the JHLAS Statement of Common Ground (SoCG) document dated September 2013.

Recommendation

 That the 2013 JHLAS housing land supply figure for the Neath Port Talbot County Borough Council area be determined as 2.6 years.

Context of the Recommendation

- Local Planning Authorities have a duty to ensure that sufficient land is genuinely available or will become available to provide a 5-year supply of land for housing1. The purpose of preparing a JHLAS is to:
 - Monitor the provision of market and affordable housing;
 - Provide an agreed statement of residential land availability for development planning and control purposes; and
 - Set out the need for action where an insufficient supply is identified².
- 3. The scope of this report is to recommend an appropriate housing land supply figure in respect of Neath Port Talbot County Borough Council's area of responsibility as local planning authority, in the light of the matters in dispute concerning the calculation of such a figure and the available evidence.

Main Issues

The first issue is whether or not the past build rate method of calculation of housing land supply is the appropriate method to be used in determining how many years of supply exist. The second disputed matter is how many of the total number of

¹ PPW Edition 5 paragraph 9.2.3

² TAN 1: Joint Housing Land Availability Studies (June 2006) paragraph 2.1

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anticipated dwellings on the Coed Darcy site should be taken as forming part of the available 5 year housing supply as at 31 March 2013.

Reasons

Method of Calculation

- 5. The Neath Port Talbot Unitary Development Plan (UDP) was adopted in March 2008 and covers a plan period 2001-2016. TAN 1 (2006) states that to meet the requirement for a 5-year land supply the quantity of land agreed to be genuinely available may be compared with the remaining housing provision in the adopted development plan (the residual method)³. The 2012 Welsh Government guidance on JHLAS preparation⁴, which is intended to inform the application of TAN 1, states that where an adopted development plan is in place it is expected that the residual method will be used, and that any departure from this method is likely to be exceptional and should be fully justified. It also advises that, where the adopted development plan will expire during the study period, then the average annual provision from the last five years of the time covered by the development plan should be extrapolated to give an estimate of the land required.
- 6. The Council maintains that, notwithstanding that there is an adopted development plan in place with a period of time yet to run, the residual method of calculation is not appropriate in this particular instance and that the calculation should instead be based on past build rates. In essence, the Council's basis for this contention is that the UDP housing requirement of 6150 dwellings (equating to an annual requirement of 410 units per year) is an aspirational figure, based on an underlying strategy of seeking to reverse recent population loss in the area and to encourage population recovery back to 1991 levels. In the event, both the 2011 census and the subsequent 2012 mid year estimated population figures indicate that this target has now been achieved, despite an actual annualised build rate of only 328 new dwelling units⁵. Based on this, the Council considers that the level of residential development actually delivered since 2001 has produced the specific defined level of population growth sought by the plan, and maintains that a continuation of the past build rates represents an appropriate level of new housing provision consistent with development plan aims and objectives.
- 7. The argument that the UDP housing requirement is an "aspirational" (ie artificially high) number, rendering the residual method of calculation inappropriate and pointing to a calculation based on past build rates, was accepted in determining an appropriate housing land supply figure in respect of the 2011 and 2012 JHLAS exercises. However, more information and detailed argument on both sides concerning the appropriate methodology to follow has been submitted on this occasion.
- 8. Where an adopted development plan is in place the expectation is that the residual method will be used. Government guidance is that any departure from this method is likely to be exceptional and should be fully justified. Whilst it is clear that the UDP housing requirement figure of 6150 reflected a specific growth aspiration, and the latest estimates suggest that the objective of population recovery to 1991 levels has been met, it nonetheless remains as the current development plan housing strategy

³ TAN 1 para 7.5.2

Welsh Government Guidance Note "Joint Housing land Availability Study process 2012" (February 2012)

⁵ See pages 20 and 21 of SoCG document

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for Neath Port Talbot, adopted as recently as 2008 and intended to run through to 2016 or until such time as overtaken by the emerging LDP. Although the objective of return to 1991 population levels appears to have been met, and evidently despite a lower rate of housing delivery than thought necessary, the requirement on the Council remains to ensure at least a 5 year housing land supply, calculated on the basis of the area's anticipated housing needs for that period. There is no substantive evidence that a past build rate of 328 units a year represents a more reliable basis for calculating the adequacy of the land supply as at 31 March 2013 than the residual method based on the remaining life of the UDP.

- 9. Furthermore, whilst it would be wrong to place undue reliance on the detailed housing requirement figures in the emerging LDP, which has yet to undergo independent examination, the Council's proposed housing requirement in the deposit Plan, presumably based on what it considers to be robust evidence, is for 8,000 dwellings to be delivered over the period 2011-26. This represents an annualised build rate of 533 dwellings, which is much higher than the past build rate of 328 dwellings a year, and higher also than the annualised build rate over the UDP period (410 dwellings). The present direction of travel in Neath Port Talbot is plainly towards a significantly higher rate of housing delivery than has been achieved in recent years. I note also the recent increased Ministerial emphasis on more effective housing delivery. Taking all of this together, I do not consider that justification for using past build rates rather than the usual residual method of calculation exists in this case. Indeed, it seems to me that continued calculation of housing land supply based on past build rates at this time could well act against effective delivery of housing across the time period of the emerging LDP, which has already commenced.
- 10. Accordingly, I conclude that the residual method of calculation is the appropriate method to use in this case. Following the guidance concerning extrapolation of average annual provision from the last five years of the time covered by the development plan where the whole of the five year supply period is not already covered by the plan, the total housing requirement for 2013-18 is thus calculated as 3,324 dwelling units, as set out in Section 4.2, Tables 7, 8 and 9 of the SoCG.

Coed Darcy

- 11. Coed Darcy represents the only element of the housing land supply side of the equation where agreement has not been reached. Coed Darcy is a large "urban village" redevelopment of the former Llandarcy oil refinery complex, the various residential phases of which will eventually provide some 4,000 dwellings. The area of dispute concerns the number of units that can reasonably be expected to be built over the 5 year period to 31 March 2018. Development delivery is as yet at an early stage, with only 3 housing units completed at the JHLAS date and a further 11 units under construction. Alternative scenarios and the respective rationales for these have been provided by the Council, by Home Builders Federation (HBF) and Redrow, and by St Modwen (represented by Savills)⁶.
- 12. The Council anticipates that (in addition to the 11 units already underway at 31 March) 30 units will be developed in year 1, rising to 100 in year 2 and 125 in each of years 3, 4 and 5 (516 units in total). Given the strategic profile of the scheme the

⁶ See SoCG document pages 9-14

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Council anticipates that multiple housing developments will run concurrently, with possibly 3 or 4 individual schemes active towards the end of the 5 year period.

- 13. HBF/Redrow's position on this matter is that Coed Darcy is likely to deliver only 261 dwellings in the 5 year period. The stated rationale for this is that this location (identified in the HBF/Redrow tables as Area 1 (Atlantic Homes) and Coed Darcy (Persimmon) together) is capable of supporting at best 3 developers delivering at a rate just exceeding 30 units a year, or 4 developers delivering 25 units each a year, once full development momentum is established.
- 14. St Modwen/Savills, on the other hand, argue that Coed Darcy is capable of delivering 610 units over the 5 years. Their statement points to better than expected initial performance on the Persimmon Phase 1a site. Moreover, it is said that St Modwen Homes, who will be starting phase 2 (about 300 units) in early 2014 with first completions early in JHLAS year 2, is capable of high volume delivery.
- 15. In considering these competing arguments and scenarios, it seems to me that, notwithstanding the more cautionary stance adopted by HBF/Redrow, there are good grounds for anticipating the rate of delivery forecast by the Council. This is a strategic scale development, with major complementary uses also planned, well located on the outskirts of Swansea and with good access to the M4 corridor. I consider that the evidence provided by St Modwen/Savills concerning early development rates on the Persimmon Phase 1a site is persuasive as regards expected completion rates in JHLAS year 1; this analysis is not disputed by others. However, the contention that completion rates will rise beyond 125 units to 150 and then 175 in years 4 and 5 is more speculative. I find no good evidence at this time which leads me beyond an annual completion rate of 125 units.
- 16. In the light of the foregoing I conclude that the 5 year contribution made by the Coed Darcy site should be assessed as 546 units (ie 516 units as calculated by the Council plus 30 additional completions in year 1 as calculated by St Modwen's/Savills in respect of Persimmon Phase 1a). The overall 5 year land supply figure for the Neath Port Talbot area should therefore be calculated as 1731 units⁷.

Overall Conclusions

17. I conclude that the housing land supply for the Neath Port Talbot County Borough Council area should be calculated using the residual method, and that the overall 5 year land supply figure for the area should be calculated as 1731 units. Based on the residual method calculation of the total 5 year land requirement as being 3324 units, representing an annual requirement of 665 units, I conclude that the housing land supply figure for the Neath Port Talbot County Borough Council planning area as at 31 March 2013 is 2.6 years (1731 units divided by an annual requirement of 665 units).

Alwyn B Nixon

Inspector

DOCUMENTS: Neath Port Talbot JHLAS SoCG September 2013

As SoCG Table 11 plus disputed site adjustment of +30 units