

WELSH GOVERNMENT
Examination Hearing
Statement

Pembrokeshire Coast National Park Authority
Local Development Plan

Matter 7

Affordable Housing, Gypsy and Travellers
Accommodation

10 July 2019

Matter 7 – Affordable Housing, Gypsy and Travellers Accommodation

Issue: Are the requirements for affordable housing and Gypsy and Travellers accommodation supported by robust and credible evidence and consistent with national policy? And will they be met during the Plan period?

Affordable Housing

1. Is the required level of affordable housing need based on robust evidence?

a) Is the Local Housing Market Assessment (LHMA) sufficiently robust to inform the Plan's housing strategy?

This is a matter for the Authority

b) What scale of housing need is identified in the LHMA?

This is a matter for the Authority

c) What mix of tenure (e.g. intermediate or social rented) and type of dwelling (bedroom size) is required?

This is a matter for the Authority

d) Will the affordable housing target of 250 dwellings meet the local housing need, if not what other mechanisms are available?

This is a matter for the Authority

2. Are the requirements of Policy 49 clear, and consistent with national policy?

No. Our Focussed Change representation raised two objections on Policy 49 relating to the calculation of the affordable housing target and its alignment with other figures in the plan proposed through Focussed Change (FC) 15. These objections remain outstanding.

a) Should the requirements of Table 9 be included in the Policy?

Yes. It is the Welsh Governments understanding the Authority has already proposed the inclusion of Table 9 in Policy 49.

b) How will off site or financial contributions for affordable housing be managed?

This is a matter for the Authority

c) Should the Plan include a separate policy for securing affordable housing on exception sites in rural areas?

Yes. The Welsh Government notes that whilst Policy 49 currently permits the release of land on exception sites a separate policy is necessary to meet the requirements set out in paragraph 4.2.34 of PPW (Edition 10).

d) Is reference to Policy 53 necessary?

This is a matter for the Authority.

3. Are the required affordable housing contributions founded on a credible assessment of viability?

a) Are the affordable housing contributions contained in Table 9 based on robust viability evidence?

This is a matter for the Authority.

b) How have the site thresholds contained in Table 9 been defined?

This is a matter for the Authority to explain. In our Focussed Change representation we raised the issue of site thresholds, which appear to be based on the ability to deliver 1 affordable unit on site and not whether the threshold is viable to achieve the percentage targets. The Welsh Government does not disagree with the localised approach but considers further explanation by the Authority on how the thresholds were chosen would be advantageous.

c) Does Table 9 reflect the findings of the Affordable Housing Viability Study (NPA042), and if not why not?

This is a matter for the Authority. Please see our response to Q3(a).

d) How have the levels of contribution taken into account rising build costs, planning obligations, sustainable urban drainage systems and other associated requirements?

This is a matter for the Authority. The Welsh Government's position is that SUDs is cost neutral on new development.

e) Do the BICS build costs take into account the cost of providing fire sprinklers, if so what allowance per dwelling is made for the provision?

The Welsh Government commented at Deposit stage that sprinkler costs had not been factored into the 2016 Affordable Housing Study at £3,100 per dwelling. At this time, the viability work pre-dated the inclusion of sprinklers in the BCIS and we note the Council has undertaken its own analysis (NPA048) on costing sprinklers, which has resulted in a change to some of the affordable housing targets in Policies 48 and 49 of the plan. It will be for the Authority to explain that affordable housing targets remain viable when all necessary costs, including sprinklers, have been considered.

f) Is Table 9 sufficiently clear, particularly with regard to the differing requirements for the geographical areas, and should these areas be shown on the proposals map?

This is a matter for the Authority although there should be a clear spatial representation of where the submarket areas and corresponding targets apply.

4. Will the Plan deliver the affordable housing requirement?

a) Is the affordable housing target of 250 dwellings based on robust evidence?

No. Please see our response to Q2 on clarity of the target.

b) How will the affordable housing target be delivered?

This is a matter for the Authority.

c) How will off-site contributions be secured, and what mechanisms are in place to ensure that the level of contributions sought are appropriate?

This is a matter for the Authority.

d) Will Policy 50 ensure a balanced mix of house types, tenures and sizes, and is the required density level appropriate for the National Park?

This is a matter for the Authority.

5. Is the spatial distribution of affordable housing sound and does it adequately reflect local needs?

This is a matter for the Authority.

Gypsy and Traveller Accommodation

6. Is the Plan based on a sound assessment of Gypsy and Traveller accommodation needs?

a) Is the Gypsy and Travellers Accommodation Assessment (GTAA) robust enough to inform the Plan's strategy?

This is a matter for the Authority.

b) Does the GTAA identify a need for new Gypsy and Traveller pitches, both permanent and transit, in Pembrokeshire over the Plan period, and how will this be met?

The GTAA identifies a need for 101 pitches across the whole of Pembrokeshire by 2031 with an immediate need for 32 residential pitches and 2 Travelling Showpeople's Yards by 2020. The Statement of Common Ground (NPA026)

between Pembrokeshire Coast National Park Authority and Pembrokeshire County Council agrees that the location of Gypsy and Traveller sites will not be in the Park. As the Welsh Government does not comment on the location of Gypsy and Traveller sites and we have no further comment in this respect.

7. Does Policy 51 provide a clear and consistent framework for assessing proposals for additional Gypsy and Travellers sites, and is it consistent with national policy?

No. It is clear in WGC 005/2018: Planning for Gypsy, Traveller and Showpeople Sites that policy criteria only permitting sites where there is 'need' is not acceptable as it acts against the freedom of movement for Gypsy and Travellers wishing to develop their own site. Policy 51 Criterion a) should be deleted accordingly.

One Planet Development

8. Are the requirements of Policy 52 clear and consistent with the requirements of national policy?

This is a matter for the Authority.

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