

Soundness Tests Appendix 5: Authority's response to Pembrokeshire County Council comments

Deposit Representations

Representation 2708/314

Representor considers the Plan Unsound after applying soundness tests C1

Representation refers to the following elements of the Plan

HA384 Solva - Adjacent to Bro Dawel
HA723 former cottage Hospital Site, Tenby
HA727 West of Narberth Road, Tenby
HA750 Depot Site, Crymch
HA704 Junction of Sandyke Road and Millmoor Way, Broad Haven
Policy 32
Policy 33
Chapter 4D
HA377 Tenby - Brynhir
HA752 Butts Field Car park, Tenby

Summary of Representation

The County Council as landowner objects to the imposition of the burden of providing affordable housing, unequally on the sites it owns, with the percentage of affordable housing proposed being up to 100%. The affordable housing requirement should be spread equally across all of the identified sites and windfall developments that occur in the National Park over the plan period.

Change to the Plan requested

The affordable housing requirement should be spread equally across all of the identified sites and windfall developments that occur in the National Park over the plan period.

Further contact with the Representor

Pembrokeshire Coast National Park Authority response

Disagree. The approach of the Authority is to seek meet the affordable housing need where it originates but supplies of land are limited in some instances. Thus high levels of need in Tenby and Saundersfoot are matched with limited supplies of land and therefore high percentage requirements on landowners (including the County Council). No distinction is made between landowners. Affordable housing provision would not just be social housing and if the design approach is similar how will such housing be distinguished? The amount of social housing grant likely to be needed is defined in the Housing Background Paper. This information has been shared with the County Council several times. The amount required is not considered to be substantive in nature over the life of the Plan. The Authority has sought to ensure private development bears the burden. The reference to the public funding shortfall is not understood in this context. The calculation used to produce a figure of 33% is a simplified one and fails to take account of the fact that 387 dwellings are already committed development (Table 5). 1/3 of 1600 -387 is an estimated 400 dwellings. Also the affordable housing provision figure only takes account of existing need and not emerging need. Two sites have been allocated for housing at Solva. In addition to the land adjacent to Bro Dawel owned by the County Council, land has been allocated at Bank House. This land is subject to a covenant and should it not prove possible to develop an assessment has been undertaken which shows that it would be viable to provide 100% affordable housing on the site adjacent to Bro Dawel with Social Housing Grant. (Please see response to representation 3721/93). Officers here have met with County Council representatives and run through what work this Authority has done on the Three Dragons model. No issues were identified in relation to the method used. The Three Dragons toolkit is currently being updated, but the updated version will not be available in time to re-run the tests prior to submission. However, it should be noted that in the viability tests done to date, various market price scenarios have been considered (as shown in

appendix 3 of the Housing Background Paper), and the requirements of the Code for Sustainable Homes anticipated by assuming construction to BREEAM Ecohomes Excellent standard in all tests. No change is proposed.

Since the Deposit Local Development Plan was published Ministerial Interim Planning Policy Statement 'Planning for Sustainable Buildings' May 2009 (01/2009) has been published and provided an update on national planning policy in relation to this issue. Officers have also engaged consultants to assess the opportunities and costs of including onsite/near site renewable energy generation at Glasfryn Lane, St Davids and Brynhir, Tenby.

The conclusions and recommendations of the draft report by the National Energy Foundation would suggest that the requirement set out in the policy for Brynhir and the allocation at Glasfryn, St Davids be deleted.

Reference can be made in the text on the Brynhir and Butts Field, Tenby and West of Glasfryn Road St Davids in Appendix 2 of the Plan to the National Energy Foundation Report providing advice on the options available for low and zero carbon technologies for each of these sites. This is an 'other' change. Also the new Welsh Assembly Government standards can be achieved by specifying a high performance building fabric or with the combination of an elevated building fabric standard and the use of solar thermal or biomass boilers, the latter being the most cost effective option. For this reason the requirement to include solar panels at paragraph 4.92 is considered to be too prescriptive and should be removed. This is an 'other' change.

Representation 2708/316

Representor considers the Plan Unsound after applying soundness tests CE4

Representation refers to the following elements of the Plan

Paragraph 4.99

Policy 19

Summary of Representation

Pembrokeshire County Council's waste and recycling collections across the County are provided, for households and non-domestic premises, at the kerbside, adjacent to an adopted highway. We would request that the LDP allows for appropriate collection practices.

Change to the Plan requested

Amend to refer to kerbside schemes and collection from non-domestic premises. Wording provided.

Further contact with the Representor

Pembrokeshire Coast National Park Authority response

Agree. The means of collection is not considered to be a planning matter and has been discussed at 4.99 as background to the waste management within the County. It would not preclude other forms of collection taking place. Notwithstanding this, amendment to the text provided by the representor seems reasonable in providing further background information as a minor editing change to reflect a factual inclusion.

Representation 2708/318

Representor considers the Plan Unsound after applying soundness tests CE1;CE4

Representation refers to the following elements of the Plan

Policy 15

Paragraph 4.81

PM4

Summary of Representation

PCC would request the National Park make provision for exception to Policy 15 for the future

development of St Davids CA Site is required, provided that criteria a) to e) of Policy 15 are met.

Change to the Plan requested

St Davids CA should be identified as an exception to Policy 15.

Further contact with the Representor

Pembrokeshire Coast National Park Authority response

The request for an exception to Policy 15 at St Davids is made on the same basis as that for Tenby Civic Amenity Site. It is considered that this approach would give greater certainty to the Waste Management Authority when developing any future proposals for this area. This can be accommodated as an 'other' change.

Representation 2708/319

Representor considers the Plan Unsound after applying soundness tests CE1

Representation refers to the following elements of the Plan

Policy 15

Paragraph 4.81

Summary of Representation

Summary - Pembrokeshire County Council would request that the Policy 15 text "Local Waste management and recycling facilities which serve only the National Park are will be permitted provided;" is amended to reflect the exception to policy 15 outlined in paragraph 4.81

Change to the Plan requested

Policy 15 text "Local Waste management and recycling facilities which serve only the National Park are will be permitted provided;" be amended to reflect the exception to policy 15 outlined in paragraph 4.81

Further contact with the Representor

Pembrokeshire Coast National Park Authority response

Disagree with representation. It seems illogical that an exception to policy would be required to form part of the policy. The text at paragraph 4.81 is sufficient to provide certainty for proposals identified as exceptions. Any such proposals would still be required to satisfy criteria a) to e) and no further amendment to the policy is considered appropriate. No change is proposed.

Alternative Sites Representations

Representation 2708/831A

Representor considers the Plan Not stated after applying soundness tests Not Given

Representation refers to the following elements of the Plan

MA776 Land at Broad Haven north east of Marine Road

Summary of Representation

No highway access identified, site is too small and an illogical shape, therefore I support the larger alternative suggested on behalf the Raymond brothers which with its new access and link road will provide traffic benefits and extensive pos to the benefit of the wider community. The workshops suggested for the smaller site are highly unlikely to be viable in commercial terms, unless there is an element of retail also - I suggest that live/work units might be more appropriate.

Change to the Plan requested

N/A

Further contact with the Representor

N/A

Pembrokeshire Coast National Park Authority response

The area allocated, along with a wider area indicated by the arrow for future expansion has been assessed by the Authority using the Site Criteria Background Paper and is considered to be appropriate for development as detailed in Appendix 3a. Only a limited area has been allocated in the Deposit Plan which can accommodate identified affordable housing needs at a 50% of the total provision. This will also help to ensure that land is available in the longer term, beyond the Plan period to accommodate future needs for affordable housing.

It is proposed that the site be extended to include an additional 5 units (including 3 affordable units) which were proposed on the site at the junction of Sandyke Road and Millmoor Way. The landowners have made a representation to suggest that due to the costs of accessing the site and providing the workshops and village hall the site area should be increased to allow for 100 houses to be accommodated. They also propose a section 106 Agreement to provide for contributions to local library and education facilities, the upgrading of community facilities, the provision and future maintenance of public open space and to secure the upgrading/replacement of the sewage pumping station and the affordable housing provision.

Advice has been sought from Officers at Pembrokeshire County Council to establish an estimate of the cost of creating an access into the site. It has been advised that a road would cost £750,000 plus additional expenses to account for ground levels, instability etc. The total cost is likely to be in excess of £1 million. The costs of providing the road need to be taken into account when considering the viability of providing affordable housing at this site. Reassessments of the site are shown in Appendix 1 of the Housing Background Paper and they show that with the provision of Social Housing Grant an increase in the site area to accommodate 30 houses (an increase of 10); with 43% affordable housing provision (13 units) would be viable. Without social housing grant a total of 35 dwellings would be needed of which 37% (13 units) would be affordable houses.

The need for workshop type units has been identified by Pembrokeshire County Council's Director of Development. This Authority has been specifically advised by the Director that live/work units were not required.

It is proposed that an 'other' amendment be made to the Plan by increasing the site east of Marine Road to accommodate up to 35 dwellings. Table 3 will require amendment to indicate the increased area of 2.29ha for 35 units with a 37% provision of affordable units (13 units). Table 8 will require amendment to show the number of units for the site as 35 with 35 in Phase 2. An amendment to Appendix 2 of the Plan is proposed to advise that a green corridor is to be provided along the western boundary of the site linking the open space identified to the north and south of the site. Hedgebanks would be constructed with a 3m wide path between.

Representation 2708/832A

Representor considers the Plan Not stated after applying soundness tests Not Given

Representation refers to the following elements of the Plan

HA750 Depot Site, Crymych

Summary of Representation

HA750 - former depot - would prefer no allocation and to deal with the site using policy rather than requiring 100% affordable housing that is undeliverable and takes no account of other potential residential development in Crymych.

A local Health Centre is proposed for a better site in Crymych, outside the National Park, but could revert to the former depot site if that other site proves undeliverable.

Change to the Plan requested

N/A

Further contact with the Representor

N/A

Pembrokeshire Coast National Park Authority response

Only a small part of Crymych is within the National Park and the future role of the village will be predominately defined by opportunities outside the National Park. The Depot Site has been assessed by the Authority using the Site Criteria Background Paper for suitability for its re-use for development. The results of the appraisal are contained in Appendix 3A. Appendix 1 of the Housing background paper identifies that there are 22 households on the waiting list in Crymych. The paper also details the viability testing for the site.

No new evidence has been provided through the consultation which would suggest that the Authority's evaluation should be altered and the Local Development Plan changed, as no commitments have been given by Pembrokeshire County Council that they will try to accommodate the identified need for affordable housing in their planning area when invited to comment on this allocation as a draft proposal for the Local Development Plan. This site is therefore allocated for this purpose, and as such would not be available for development of a health centre.

No change to the Plan is proposed.

Representation 2708/833A

Representor considers the Plan Not stated after applying soundness tests Not Given

Representation refers to the following elements of the Plan

Alt1035 Off Bridge Street Llanychaer

Alt1071 Land opposite Ddol Isaf Llanychaer

Summary of Representation

Site Alt 1035 includes land owned by PCC and used for community events and general picnic area. This land sits in the flood plain and is therefore not suitable for development.

Alt 1071 adjoins PCC land, has no means of access to the highway and is within the flood plain.

Change to the Plan requested

N/A

Further contact with the Representor

N/A

Pembrokeshire Coast National Park Authority response

Please see response to representation 3936/983.

Representation 2708/834A

Representor considers the Plan Not stated after applying soundness tests Not Given

Representation refers to the following elements of the Plan

Alt1019 Depot and Pottery Site Parrog Road Newport

MA232 Land adjacent to the Business Park, Feidr Pen y Bont

HA220 Caravan Park off Parrog Road, Newport

Summary of Representation

PCC does not own alt 1019 for proposed library and youth centre, nor an identified source of funding therefore such a scheme is unlikely to be brought forward by the PCC. Site MA232 is likely to be developed before the LDP comes into effect and should be replaced with further employment sites. I would support HA220 provided it is accessed from the adjacent cul de sac opposite Spring Hill.

Change to the Plan requested

N/A

Further contact with the Representor

N/A

Pembrokeshire Coast National Park Authority response

Comments are noted relating to sites Alt1019 and HA220 are noted.

Please see response to representation 3778/824A.

No change to the Plan is proposed.

Representation 2708/835A

Representor considers the Plan Not stated after applying soundness tests Not Given

Representation refers to the following elements of the Plan

HA384 Solva - Adjacent to Bro Dawel

Alt736 North of Bro Dawel, Solva

Summary of Representation

Site HA 384 - I cannot see that an alternative site for the football pitches has been allocated and this omission may make the housing development difficult to achieve.

Alt 736 is too large and does not leave a sensible field shape behind.

Change to the Plan requested

N/A

Further contact with the Representor

N/A

Pembrokeshire Coast National Park Authority response

Land has not been allocated for a replacement football pitch. A development brief has previously been prepared by the National Park Authority which demonstrates that this site can accommodate a junior pitch, tennis court and 18 houses. This information could usefully be added to Appendix 2 of the Deposit Plan to clarify this position.

A minor editing change is proposed to insert the above information into Appendix 2 of the Plan.

Representation 2708/836A

Representor considers the Plan Not stated after applying soundness tests Not Given

Representation refers to the following elements of the Plan

Alt1055 Adjacent to the school St Ishmaels

Summary of Representation

The complete development of Alt 1055 would prevent the school from expanding in the future, whilst producing more pupils.

Change to the Plan requested

N/A

Further contact with the Representor

N/A

Pembrokeshire Coast National Park Authority response

The site allocation at St Ishmaels was deliberately made as a mixed allocation to take account of future possibilities that the school may need to expand, following advice from Pembrokeshire County Council. Since the publication of the Deposit Plan, the County Council has submitted a planning application for the proposed extension of St Ishmaels School. This current proposed extension is contained within the existing school grounds. Pembrokeshire County Council has been contacted to establish whether further extensions to the school are planned which would

necessitate the site allocation to be retained as a mixed allocation. They have advised that they 'would wish to retain the land previously identified for any further potential extensions, arising out of any future housing developments.'

No change to the Plan is proposed.

Representation 2708/837A

Representor considers the Plan Not stated after applying soundness tests Not Given

Representation refers to the following elements of the Plan

HA752 Butts Field Car park, Tenby

Summary of Representation

Butts Field – Transportation and car parking need to be considered in a holistic way before deciding whether this site can be released without providing additional parking.

Change to the Plan requested

N/A

Further contact with the Representor

N/A

Pembrokeshire Coast National Park Authority response

The provision of car parking is a central issue in the acceptability of the development of Butts Field. The provision of a wider traffic management study will be important in addressing issues of car parking, traffic congestion and park and ride and the support of the County Council in taking a holistic approach is welcomed. No change is required to the plan in response to this representation.