

WELSH GOVERNMENT
Examination Hearing
Statement

Pembrokeshire Coast National Park Authority
Local Development Plan

Matter 6

Housing Provision and Distribution

9 July 2019

Matter 6 – Housing Provision and Distribution

Issue: Is the provision and distribution of housing soundly based, supported by robust and credible evidence and is it consistent with national policy? And will it be met during the Plan period?

Provision

1. Should Policy 47 be relocated to the National Park Purposes and Spatial Strategy Chapter?

This is a matter for the local planning authority (LPA).

2. Is the housing requirement figure of 960 dwellings appropriate?

a) Has the Plan been informed by a robust assessment of the housing requirement, having regard to Planning Policy Wales?

This is a matter for the LPA.

b) In identifying the requirement figure, has adequate regard been paid to the Welsh Government household and population projections?

This is a matter for the LPA.

National policy states the latest Welsh Government local authority level Household Projections for Wales, should be considered alongside other key evidence base documents (PPW, para 4.2.6). The latest Population Projections for Pembrokeshire Coast National Park project an overall decrease in population over the plan period. We support the authority in planning positively for future growth to accommodate local needs in their area, rather than planning for decline.

c) Have alternative housing growth scenarios been considered, if so, why have they been discounted, and why has the preferred option been chosen?

This is a matter for the LPA.

d) Has the requirement figure been informed by a robust assessment of the main local influences on housing demand in the National Park including, decreasing household formation size, migration levels, and vacancy rates?

This is a matter for the LPA.

e) Does the Plan place too much emphasis on market housing as an enabler for the delivery of affordable housing?

This is a matter for the LPA.

3. Is the housing supply calculations of 1,150 appropriate?

a) What is the make up of the housing land supply?

Our representation to the Authority's Focussed Changes consultation highlighted a number of issues and inconsistencies in the components of housing land supply. These related to inconsistencies between the table of Components of Housing Land Supply (Table 5) and the Housing Background Paper (November 2018). The Authority's Focussed Changes Consultation Report Addendum states that the Housing Background Papers will be amended to accord with Table 5 (FC15). Therefore, we make the following comments in relation to the accuracy of Table 5.

Row A - The total number of completions on large and small sites is 154. This is not consistent with the results from the authority's Joint Housing Land Availability Study. The authority need to clarify this figure.

Row C – Units with permission. Further clarity is required on the sites that comprise the land bank figure of 147 and the number of units that have permission on allocated sites. The authority should complete a table detailing the timing and phasing of sites with planning permission (see Table 20 in the Draft Development Plans Manual, edition 3, consultation draft, June 2019). This should align with the authority's JHLAS and will inform a robust trajectory and aid effective monitoring.

Rows E and F – The windfall allowances should equate to a complete or whole number of units (not fractions) for each year of the plan period. For example, small windfall sites (row F) totals 283 units, when divided by 13 years of the plan remaining, this equals 21.8 units per annum. The Housing Trajectory (NPA050) shows the small site windfall figure as 22 units per annum, which totals 286 units over the 13 years remaining. The same principle applies to large windfall sites. The figures in Table 5 should be amended to enable greater transparency and effective monitoring.

We note the authority has updated the housing trajectory (NPA050), however, there remain minor inconsistencies in the figures in the trajectory and Table 5.

b) Should Policy 48 also include details of the committed sites?

The policy should clearly identify allocations. Separately, an Annex containing a table setting out the anticipated delivery of commitments with regards to timings is appropriate. This will inform the housing trajectory, demonstrate the plan can be delivered and enable effective monitoring of all housing components.

c) Is the estimated yield of units from committed and windfall sites realistic and based on available evidence? and has a non-delivery allowance been defined and applied?

This is a matter for the authority to evidence.

d) How has the flexibility allowance of 16% been defined, and is it based on robust evidence?

Policy 47 'Housing' states the overall provision is for 1,150 housing units in order to deliver a housing requirement of 960 dwellings. This comprises a 20% flexibility allowance. It is a matter for the LPA to evidence and justify why a 20% flexibility allowance is appropriate. The plan must ensure there is sufficient flexibility to account for non-delivery and unforeseen issues.

e) Will there be a 5-year supply of housing for the duration of the Plan period? and how has this been calculated?

This is a matter for the LPA to evidence. The housing trajectory needs to be updated to accurately utilise the figures in Table 5.

As stated in our representation to the Focussed Changes, the housing trajectory should be based on the phasing and build rates on an annual basis for the entire

plan period. The authority should complete a table detailing the timing and phasing of all allocated and committed sites (see Tables 19 and 20 in the Draft Development Plans Manual, edition 3, consultation draft, June 2019). This should align with the authority's JHLAS and will inform a robust trajectory and aid effective monitoring. It can be appropriate to annualise small and large scale windfalls, based on past rates.

4. Will the Plan deliver the housing requirement?

a) Are the site allocations available and deliverable within the anticipated timescales? Are the allocations supported by a robust and comprehensive site assessment methodology, free from significant development constraints and demonstrated to be economically viable?

This is a matter for the LPA to evidence. Information on key sites and their delivery and implementation issues, including site constraints, necessary mitigation / compensation measures and s106 planning obligations / infrastructure requirements could be usefully collated into an implementation and delivery appendix.

b) Should Table 7: Housing Allocation – Requirements be relocated to the Appendix, expanded to include committed sites, and provide details of all known constraints, planning obligations and infrastructure requirements?

Yes, the detailed site specific information in Table 7 would be best placed in the appendix. The authority could consider expanding the table to include information from Table 13 (NPA048).

Distribution

5. Is the spatial distribution of housing provision sustainable and coherent?

a) How will new windfall development within each tier of the settlement hierarchy be assessed and managed?

This is a matter for the LPA.

b) Is the spatial distribution of housing allocations and windfall opportunities consistent with the identified settlement hierarchy?

This is a matter for the LPA.

c) Have the centre boundaries been drawn consistently and coherently?

This is a matter for the LPA.

d) Should more housing land be allocated in Tenby?

This is a matter for the LPA.

e) In the absence of defined centre boundaries in small villages can the level of growth be effectively controlled? and should development in these villages be restricted to infill only?

It is a matter for the LPA to ensure the policy is clear to ensure growth can be controlled in these settlements, in accordance with national policy. National policy refers to infill and minor extensions being acceptable (PPW, paragraph 3.56).

6. Is the Plan's housing strategy sufficiently flexible to respond to changing circumstances?

This is a matter for the LPA.