

Pembrokeshire Coast National Park

Local Development Plan (2015-2031)

Session 6

Tuesday 9th of July 2019 9.30 am

Housing Provision and Distribution

Hearing Statement

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(Ryan Norman Dwr Cymru)
(Stephen Benger Pembrokeshire County Council)

Bring to the session - paper (note web access available):

- Edge Analytics NPA043
- Housing Background Paper NPA044,045,049,050,048
- Land Implementation Study (NPA052 to NPA054)

June 2019

**PEMBROKESHIRE COAST NATIONAL PARK
AUTHORITY**

Session/Matter 6 – Housing Provision and Distribution Tuesday 9th July 9.30am	
<i>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?</i>	MD
Provision	
1. Should Policy 47 be relocated to the National Park Purposes and Spatial Strategy Chapter?	
NPA Response: Experience has also shown that strategy policies in a grouped scenario (Joint Unitary Development Plan for Pembrokeshire) away from the specific topic area tend to be overlooked in day to day development management. Those using the Plan since 2010 are familiar with the format. Please also see the response to Q2 Session 3. The Authority would prefer if it was retained in this location.	
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?	
b) In identifying the requirement figure, has adequate regard been paid to the Welsh Government household and population projections?	
c) Have alternative housing growth scenarios been considered, if so, why have they been discounted, and why has the preferred option been chosen?	
NPA Response: For Questions 2a) to c) Please see NPA057 Background Paper Alternative Options & Appraisal pages 68 to 70 regarding Policy 47 and Policy 49 and Exam06 (Local Development Plan with focussed changes and PPW10 edits) pages 112 to 117 to the end of paragraph 4.278.	
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?	PB
NPA Response: Please see 2c) above. The Authority also commissioned Edge Analytics to produce a Demographic forecasts report for the National Park area – NPA 043 . The report sets out a range of demographic and housing-led scenarios, modelled using the POPGROUP v4.0 model. Edge Analytics also carried out four ‘dwelling-led’ projections for PCNPA. Section 2 of the report describes the profile of the National Park area including the key local influences or “components of change” from	

<p>historical data (Section 2, page 5). The report concludes that the dominant driver of change has been net migration and that natural change (the balance between births and deaths) has been negative in all years of the historical period examined (2001 – 2016, historical estimates from the Office for National Statistics). This is leading to a decreasing population overall.</p> <p>Further examined in Section 2 of the report (NPA043) are components that influence household formation and size including population age structure, household completions and commuting (Section 2, pages 5-9).</p> <p>The subject of vacancy rates is dealt with in Section 3, page 11 of the report. Vacancy rates, as defined by the 2011 census, has been used in all of the modelling carried out for this commission (Section 4, paragraph 4.2, page 12).</p> <p>In carrying out the demographic and dwelling-led forecasts for the National Park, Edge Analytics worked closely with Welsh Government. Welsh Government's 2014-based projections are provided in the report as the benchmark growth outcome against which all of the other scenarios are compared. For the purposes of the scenario modelling the Edge Analytics used the 2001-2016 estimates, which provide an additional 2 years of estimates beyond the Welsh Government 2014 projections.</p>	
<p>e) Does the Plan place too much emphasis on market housing as an enabler for the delivery of affordable housing?</p>	<p>MD</p>
<p>NPA Response: The rationale for relying primarily on cross subsidy from market housing is as a result of public subsidy being only able to deliver a limited amount of affordable housing.</p> <p>The most common mechanisms for delivery of affordable housing in the Park in order of popularity are:</p> <ol style="list-style-type: none"> 1. Housing Association delivers part of a private site usually building out themselves. 2. Millbay Homes (part of Ateb housing association) develops a private site and affordable housing provision for Ateb. 3. Private developer develops and sells part of the site to Housing Association 4. Housing Association develops an 'exception' site 5. Affordable housing contributions used to bring forward some of the above options or to purchase an existing dwelling to use as an affordable dwelling. <p>More recently there has been increased interest and activity around:</p> <ul style="list-style-type: none"> - Community Land Trusts - The County Council developing housing under its Housing 	

Revenue Account programme.	
3. Is the housing supply calculations of 1,150 appropriate?	
a) What is the make-up of the housing land supply?	
NPA Response: In response to 3 and 3a) please see paragraphs 4.279 and bullets below and Table 5 of Exam06 (Local Development Plan with Focussed Changes and PPW10 edits) and the Housing Background Paper paragraphs 86 to 96 and Appendix 2 and 3 and Appendix 4 NPA044,045,049,050,048.	
b) Should Policy 48 also include details of the committed sites?	
NPA Response: Only where a start has not been made at the base date of the Plan and where the site is one that the Authority would wish see permission renewed if needed. [This approach is complicated by the fact that there is an expectation to update the housing land supply figures as the Plan moves through the Plan process to Examination and therefore in some instances a start has now been made.]	
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?	
NPA Response: Yes. The approach taken to identifying the yield of units from sites with planning permission is illustrated in the Housing Background Paper Appendix 2 and Appendix 3 and Appendix 4 paragraph 21 to 22. (NPA044,045,049,050,048). No specific 'non-delivery allowance' has been calculated and applied. This appears to be a requirement emerging in the draft LDP Manual currently being consulted upon and is not contained in the 2015 Manual which applies to this Plan's preparation and Examination. The Authority has sought advice from the Inspectorate on which Manual will be applicable for the Examination. In summary: <ul style="list-style-type: none"> - In terms of land with planning permission (5 or more units) Appendix 2 specifically shows those sites that are not counted in Row C Table 5 of the Local Development Plan which could be regarded as a 'non-delivery allowance'. The Authority has relied upon the conclusions of the relevant Land Availability Study to inform this selection. No small sites (less than 5) are included. - Row D for housing land allocations has excluded a portion of some sites that are unlikely to be delivered in the Plan period given the historic pattern of development (HA3), (HA9), (HA13), (HA14) and (HA16). - Row E reflects provision historically which would have an inherent non-delivery of planning permissions element factored into it. - Similarly Row F is calculated from historic completion rates and 	

<p>would have a non-delivery element inherent in its derivation.</p> <p>This approach ensures that there is not a double counting of 'non-delivery' as this element intrinsic with historic figures being used to extrapolate future delivery.</p>	
<p>d) How has the flexibility allowance of 16% been defined, and is it based on robust evidence?</p>	
<p>NPA Response: The flexibility allowance is a product of land supply analysis rather than a defined figure or target that has been aimed at. It will be the difference between the housing provision the Plan can identify as being potentially deliverable Table 5 of the Local Development Plan (Exam 06) 'against' the housing requirement which is based on what the market is likely to be capable of providing given past trends – Policy 47 (Exam 06). Appendix 3 has a 15% contingency calculation included to demonstrate there is flexibility in the figures.</p>	
<p>e) Will there be a 5-year supply of housing for the duration of the Plan period? and how has this been calculated?</p>	
<p>NPA Response: Yes except in the year 18/19. The Housing Background Paper (NPA044) paragraphs 86 to 96 provides an explanation and Appendix 3 (NPA050) of the Housing Background Paper provides a picture of supply with 2018/2019 showing less than 5 year effectively available housing land supply.</p>	
<p>4. Will the Plan deliver the housing requirement?</p>	
<p>(Ryan Norman & S Bengier to attend please – on standby for support – no written statement needed)</p>	
<p>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?</p>	MD/SH
<p>NPA Response: In response to 4 and 4a) there has been a robust and rigorous assessment of site allocations so please see tables in Appendix 1 to Session 8 of the NPA's response for a summary response. More detail can be found in the Housing Background Paper (NPA44 to NPA050), the Land Implementation Study (NPA052 to NPA054), the Candidate Site Assessments (NPA020 and NPA021), the Statement of Common Ground with Welsh Water(NPA027).</p>	
<p>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?</p>	MD
<p>NPA Response: Please see NPA017 Consultation Report pages 110 to 113 which provides commentary on Tables 7 and 8 at paragraph 7 page 112 and 113 which sets out the rationale for including Tables 7 and 8 in the Plan text. Regarding the requirements for committed sites, i.e. sites with planning permission:</p> <ul style="list-style-type: none"> ▪ HA1, HA2 and HA8 having had a start made. The Authority 	

<p>wouldn't anticipate needing to set out requirements in Table 7.</p> <ul style="list-style-type: none"> ▪ HA15: The current permission for this site expires in September 2019. We have no further information from the landowner in terms of how they intend to proceed. There are no specific requirements that need to be detailed in Table 7. <p>There is information on constraints in the Land Implementation Study for many of the sites see paragraph 4.290 of Exam06 (Local Development Plan with Focussed Changes and PPW10 edits). These will date as will planning obligation requirements hence the authority's reluctance to include them.</p>	
Distribution	
5. Is the spatial distribution of housing provision sustainable and coherent?	MD
<p>NPA Response: The Authority has sought to direct development to sustainable locations whilst recognising that the National Park is rural in nature. Table 5 Housing Land Supply Components Exam06 (Local Development Plan with Focussed Changes and PPW10 edits) provides a summary of the distribution of provision through the various tiers. The preceding text to the Table describes the approach taken to provision. NPA057 Alternative Options & Appraisal and NPA036 Scale & Location of Growth also provides detail on the selection of the spatial hierarchy for provision.</p>	
a) How will new windfall development within each tier of the settlement hierarchy be assessed and managed?	
<p>NPA Response: The Centres in each tier have a Centre boundary within which the principle of housing is supported, or if not in the case in some Rural Centres without defined boundaries, then there are specific criteria for allowing infill and rounding off. The Plan should be read as a whole and there will be other policies of the Plan that will be applied.</p>	
b) Is the spatial distribution of housing allocations and windfall opportunities consistent with the identified settlement hierarchy?	
<p>NPA Response: Please see the Table under Q1 of Session 8 and the commentary preceding Table 5 of Exam06 and Table 5 itself. The provision is focussed in the higher tiers particularly in terms of allocations. Tenby could have made a greater contribution proportionately if deliverable sites were available. See d) below for further analysis.</p>	
c) Have the centre boundaries been drawn consistently and coherently?	SH
<p>NPA Response: Yes. Below Tier 3 in the settlement hierarchy, a series of Rural Centres have been identified. These Centres are defined on the basis of having at least 3 facilities normally found in a small village (paragraph 4.42 of the Local Development Plan with Focussed Changes and PPW10 edits (Exam06)). Many of the Centres are in Local Development Plan 1(NPA074-076) and these centre boundaries were used as a starting point.</p> <p>The Candidate Sites Methodology Background Paper (NPA029) sets out the list of Centres at Appendix B. Additional Centres have been identified through an updated survey of facilities and services</p>	

<p>available.</p> <p>Paragraph 3.14 of the Candidate Sites Methodology Background Paper (NPA029) sets out the methodology for amending Centre boundaries. Where new Centres had been included in earlier development plans, these Centre boundaries were used as a starting point, along with up-to-date mapping and aerial photography to identify if amendments to take account of more recent development where necessary. In a small number of instances the dispersed settlement pattern of identified Centres has rendered it impractical to define a boundary. These are identified in Policy 6 of the Local Development Plan with Focussed Changes and PPW10 edits (Exam06) - see footnote 57, page 35.</p>	
<p>d) Should more housing land be allocated in Tenby?</p>	
<p>NPA Response: Please see page 99 to 103 of NPA017 Consultation Report regarding housing provision in Tenby and the search for suitable sites.</p>	<p>JG/MD</p>
<p>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?</p>	
<p>NPA Response: The provision in countryside locations tends to be approximately 50% through conversions and 50% through infill and rounding off. The housing figure of 137 for the Plan period (Table 5 Components of Land Supply) Exam06 for countryside would result in an estimated 4 or 5 infill and rounding off dwellings being completed annually in the National Park countryside. Additional safeguards have also been included in Local Development Plan 2, namely further defining what is meant by sensitive infilling and rounding off (paragraph 4.47) the need to prioritise affordable housing (which is a Plan priority). The assessment of the site for market housing in terms of public transport should affordable housing be unsuitable is retained from Local Development Plan 1 (NPA074). There are also other safeguards in place for considering such sites in the policy wording (see Policy 7a) last sentence regarding impacts on the character and through the application of the other policies of the Plan such as the landscape, biodiversity and amenity policies.</p>	
<p>6. Is the Plan's housing strategy sufficiently flexible to respond to changing circumstances?</p>	<p>MD</p>
<p>NPA Response: Soundness Test 3 requires Local Development Plans to be sufficiently flexible and to include contingency arrangements to enable them to deal with changing circumstances.</p> <p>The strategic derivation of the housing requirement for the Local Development Plan is set out in the introductory text to Chapter 4E Affordable Housing and Housing (Exam06). The housing land supply itself is derived from land with planning permission and allocations. Opportunities for windfalls are also included. The figures include a degree of flexibility – see Policy 47 and Table 5.</p> <p>The Plan includes opportunities for bringing forward a range of</p>	

windfall sites across the Centres (Policies 2 to 6) and opportunities for infill and rounding off and conversion in the countryside (Policy 7). Opportunities also arise through exceptional land releases for affordable housing (Policy 49).

Annual Monitoring Reports for Local Development Plan 1 (NPA077 – 084) show the role that windfall sites have made to housing provision. Windfall sites tend to come forward erratically but in doing so show no overall trends such as one of an overall decline in opportunities as the number of sites would be expected to reduce over time – see Appendix 4 Housing Background Paper paragraph 21 and Tables 11 and 12 NPA048. The market will in the end dictate the rate at which these windfalls come forward but the policy framework would not be a barrier to increased demand in principle.

Session 6 – Housing Provision and Distribution

Representor	Change sought	Why NPA do not think this is a sound approach
1569/122 Welsh Government	Infrastructure requirements to be put in an Appendix.	Information will become dated – Clarity and focus of the Plan – Test 2.
1569/123	General comment. More detail provided elsewhere.	
1569/124	Clarity sought – no change proposed. See NPA19 Deposit Plan representations and responses.	
1569/127	General comment. More detail provided elsewhere.	
1569/128 1569/129 1569/130 1569/131 1569/132	See NPA 17 Consultation Report - Further clarity and justification regarding housing figures – see pages 110 to 117.	Focussed Changes are proposed in response.
1569/FC2	Objection addressed. See NPA23 National Park Authority response to Focussed Changes representations.	
1569/FC5 1569/FC12	Representations highlight further inconsistencies in the housing statistics and the need for further detail.	Further edits to the Housing Background Paper is proposed in response to some of the concerns. Information will become dated – Clarity and focus of the Plan – Test 2.
2025/126 Home Builders Federation	Amendments to the affordable housing figure requirements – see NPA 17 Consultation Report – page 115 to 117.	A Focussed Change is proposed in response regarding sprinkler costs.
2708/135 2708/155 2708/156 2708/157 Pembrokeshire County Council	The inclusion of land at Brynhir Tenby – see NPA 17 Consultation Report – page 99 to 103.	Test 3 in terms of deliverability is the main issue. See across.
2897/136 Marloes & St Brides Community Council	See NPA19 Deposit Plan representations and responses.	See across.
2897/159 2897/161	See NPA19 Deposit Plan representations and	See across. Test 1 is of importance in terms of

Representor	Change sought	Why NPA do not think this is a sound approach
2897/171 2897/174	responses.	complying with national planning policy.
2906/140 2906/251 Saundersfoot Community Council	See NPA 17 Consultation Report – Pages 99 to 103 and pages 120 to 137 where the representation is listed.	See across. Test 2 in terms of appropriateness of the Plan for the area and Test 3 in terms of deliverability are the main issues.
2910/120 St Davids City Council	See NPA19 – inclusion of land for housing and employment.	See across. Test 2 in terms of what is appropriate for the area and Test 3 regarding Deliverability of proposals.
2910/121	See NPA19 – inclusion of land for housing and employment in outlying areas in the St David's City Council area.	See across. Test 2 in terms of what is appropriate for the area and Test 3 regarding Deliverability of proposals.
2910/240	See NPA19 – inclusion of Candidate Sites 142 and 097	See across. Test 3 regarding Deliverability of proposals.
3182/14 D Gammon	See NPA19 - Remove site allocation HA10. Include safeguards if it remains in the Plan.	<p>Test 1 is of issue in terms of providing sufficient land to provide for the communities' needs – see paragraph 6 of the NPA Response to this deposit plan representation NPA19.</p> <p>Planning permission to develop the site for 38 houses has been granted subject to a legal agreement (affordable housing). The safeguards requested were considered as part of the application process.</p> <p>Inclusion of the safeguards, as requested in this representation would impact on the delivery of the site and therefore the soundness of the Plan (Test 3 – delivery).</p>
3251/183 Acanthus for L Davies		
3319/187 Owen & Owen for Hean	Site allocation HA5 should include the whole of Candidate Site 031, as	The issue of concern is deliverability which requires further evidence from the

Representor	Change sought	Why NPA do not think this is a sound approach
Castle	submitted to the Authority – see NPA17 .	proposer to be consider – Test 3.
3397/182-J Barnes		
3468/160 CPRW	Amendments to exclude housing land allocations because of the agricultural land value. Jameston is specifically referred to. NPA17 .	Test 1 in terms of complying with national planning policy in terms of the need to provide for the housing needs of communities.
3582 Barnett		
3778/23 NAEG	See NPA19 – pages 104 to 106.	Ability to diverge from national planning policy – Test 1 is of concern, Test 2 in terms of its appropriateness for the Plan area and Test 3 in terms of deliverability.
4464/FC11 Hayston for John Meyrick	Propose changes to phasing and potential extension of site allocation HA11.	<p>The Authority's summary assessment of viability is set out in Appendix 1 to the Session 8 Statement by the Authority.</p> <p>Please also see the National Park Authority response to the Focussed Change representation in NPA23.</p> <p>Welsh Water has also advised that (in June 2019) the connection regarding the foul drainage will cost about £110,000 (estimate).</p> <p>These costs if additional can be accommodated in the residual uplift over the land value benchmark.</p> <p>See Candidate Site Assessment No 86. Issue arises under Test 2. appropriateness for the Plan area. The site area will need to be limited with future growth beyond 2031 in order</p>

Representor	Change sought	Why NPA do not think this is a sound approach to protect the character of the village.
4465/FC10 Hayston for Evans	Propose changes to phasing and potential extension of site allocation HA3.	See Candidate Site Assessment Site No 90 NPA020 in particular regarding the impact of a larger site's development. Soundness Test 1 would be an issue in terms of compliance with national policy and legislation for National Parks.
4579/180 D Haward for Sharp	Proposing the inclusion of Candidate Site 105 at Dinas Cross. – See NPA 17	Test 2 in terms of the appropriateness of the proposal for the Plan area.
4641/239 D Haward for W- Jones	Proposing the inclusion of land at Square and Compass Candidate Site 308 – see NPA17 .	See reference across for the National Park Authority response.
4658/242 Gray	Proposing the inclusion of land within the Centre boundary of St David's for affordable housing and employment.	Rather than an issue of soundness this relates to how best to use the policies of the Plan. See NPA17 for the Authority's response.