

**Ymgyrch Diogelu Cymru Wledig**  
**Campaign for the Protection of Rural Wales**  
**CANGEN SIR BENFRO / PEMBROKESHIRE BRANCH**

LLYWYDD / PRESIDENT Professor Arthur Thomasson  
 CADEIRYDD / CHAIRMAN Mary Sinclair  
 Glebe House Martletwy Narberth SA67 8AS 01834 891331 FAX 01834 891475  
 YSGRIFENNYDD / SECRETARY Thalia Campbell  
 ELUSEN GOFRESTREDIG / REGISTERED CHARITY



June 2019

**Pembrokeshire Coast National Park Local Development Plan Review**

**HOUSING SITES**

The Pembrokeshire Branch of the Campaign for the Protection of Rural Wales is concerned about the following in relation to housing allocations.

**Housing allocations**

The number of homes to be built within the National Park has been allocated on the basis of local needs. Therefore Candidate sites for those homes were and are chosen following the assessment of the needs of local people to live within certain National Park Communities or localities. We don't need to rehearse the basic fact that our coastal National Park is geographically narrow in extent and thus easily accessed from the wider County Council area, and that it is an area of Nationally Designated Landscape and Environment, with the highest possible protection, and any development.

On this matter of new housing within the National Park CPRW is concerned that the sites chosen are often unsustainable as indicated below and that the proposed housing is not designed to meeting the local need, other than for social housing. As a result local people are being excluded from buying and owning market homes within their own National Park

**1. PCNPA Lacks a protective policy :**

The National Park has no policy in place to restrict new-build homes to people who are resident either within the National Park or within Pembrokeshire. The proposed market housing is very vulnerable to becoming second homes or buy to let for holiday homes. This is against the aims of the National Park which is to build robust communities within it and to restrict building to what is necessary and essential. Building new homes for people from outside the area to use as occasional holiday homes is not an essential, desirable or fair use of the limited building land within the National Park. This lack of a policy is in danger of turning the National Park into another Cornwall, with local people priced out of their own home area and the plum sites within the National Park becoming allocated for wealthy people who also live mainly outside the County. The Lake District has polices in place to protect their communities from such blight. The Pembrokeshire Coast being narrow in extent and close to the sea is particularly vulnerable.

When we consider what has already been consented and in process in the National Park following allocation of sites during the original LDP process, we find the following to be very disturbing:

**2 Market homes being built and proposed that are unaffordable for local would be buyers. .**

The market homes (new homes available for sale to local people) being built for on an already allocated site such as at Jameston near Manorbier, and those proposed for Brynhir Fields in Tenby, are too expensive for local purchasers. This view was expressed by the County Councillor for the Jameston area at the determination meeting, when the Jameston scheme was given consent.. We acknowledge the level of social housing in the proposals but we also need market housing at a price level suitable for local people. The LDP housing allocation is therefore currently only enabling local people to access new social homes in the National Park and not new market homes, which we are fearful will mainly become second homes, or buy to holiday let. The allocation of new homes was supposed to be for local needs. This is not being met. The problem of supplying market homes for local people remains.. This is not sustainable or fair or inclusive.

**3 The LDP Plan is socially dividing communities:**

The National Park has a duty of Social Inclusion, and has to operate within the The Well Being of Future Generations Act, and yet in both the Jameston and Brynhir Fields sites, social homes are separated from the more expensive market homes, rather than being dispersed amongst them. This is ghettoing of the poor, while isolating the wealthy from their poorer neighbours. The National Park needs a stronger policy on Social Inclusion to prevent such social segregation, while catering for the whole spectrum of housing needs. .

**4 The LDP Plan is destroying the Best and Most Versatile Agricultural Land,, which should be protected by allocating building sites within it, on Grades 3a and lower**

In both Brynhir Fields , Tenby and in Jameston the allocated sites are on the Best and Most Valuable (BMV) agricultural land – Grade 3a in the Agricultural Land Classification, which should have ruled them out. This land is needed to produce food for this generation let alone future ones. Once built upon this land cannot return to grade 3a. even if the buildings are demolished in the future, its value as land able to be brought into food production quickly and easily is lost.

Yours sincerely Mary Sinclair Chairman of the Pembrokeshire Branch of CPRW

I attach below a press release by put out by the Pembrokeshire Branch of CPRW .

26<sup>th</sup> November 2018

**PRESS RELEASE** from the Pembrokeshire Branch of CPRW (Campaign for the Protection of Rural Wales)

**Residential development of 38 houses, (first phase - 11 affordable and 27 open market houses) in the Pembrokeshire Coast National Park in Jameston, near Manorbier Application NP/18/0610/FUL (posted on-line on the National Park website)**

The Pembrokeshire Branch of CPRW, while welcoming the provision of affordable housing, has expressed concerns about the proposed development in Jameston which is on a site allocated for development in the Pembrokeshire Coast National Park Local Development Plan (LDP) HA730/HA10 and which will be discussed at the Development Management Committee Meeting on December 5<sup>th</sup>.

The site is on some of the Best and Most Versatile (BMV) agricultural land in this case grade 3a, which the Welsh government states should be protected for growing food and for the use of future generations. This agricultural land classification is not just based on soil fertility and structure but factors in other items such as the drier climate along the coastal belt of Pembrokeshire, making the land more suitable for arable and horticulture than the wetter interior.

The affordable homes are to be located in an enclave with their own dedicated road. We are disappointed that they are not incorporated within the proposed estate as a whole as the National Park has a duty to be inclusive and we feel ought not divide people on economic and social grounds.

We are also concerned that these homes do not become second homes for absentee owners or buy-to-tourist let homes, remaining empty for much of the year. It would be a travesty to build over a landscape that has the highest possible protection (our National Park), and also an area of high agricultural value, in order to provide more second or tourist homes. The remainder of the County is available for such development.

Since the LDP was adopted in 2010 the new Predictive Agricultural Land Classification Maps have been released (December 2017), and the 2015 Wales Government Act - The Well-being of Future Generations - are both important planning considerations against which any Plan should be measured.

Mary Sinclair Chairman of the Pembrokeshire Branch of CPRW