

Main issues arising from the consultation on the Pembrokeshire Coast National Park Local Development Plan Preferred Strategy, by question, including points raised outside the main issues.

Question 5, Do you think we have set out the right approach to housing, in particular, affordable housing provision?

- 3340 Mr & Mrs K M Parsons
- 3405 Mr Ralph Parnell Davies
- 3195 Ms Sue Miles, South West Wales Integrated Transport Consortium
- 3246 Mr Paul Woolman, The Havens Community Forum
- 3261 Mr & Mrs Ian & Thalia Campbell
- 3271 Ms Sandra Bayes, Newport Area Env Group
- 3294 Mr and Mrs G & J Hughes
- 3304 Mr and Mrs JN and DM Bean
- 3182 Mrs Davina Gammon
- 3336 Mr Timothy Byrne
- 2916 Mr Andrew Davies, Tenby Town Council
- 3341 Cllr Stephanie Halse
- 3359 Capt C Ennion
- 3374 Mr John James, Amroth Community Council
- 3384 Mr A H Horley
- 3385 Ms Penny Tighe
- 3388 Mrs Gwen Bond
- 3391 Mr John Pattenden
- 140 Mr Paul Sherrington, Forestry Commission in Wales
- 3335 Mr Brian Coleman
- 2382 Mr Andrew McCabe, Manorbier Conservation Group
- 307 Tenby Chamber of Trade and Tourism
- 1092 Bourne Leisure Limited
- 1308 Cllr Ray Hine, Manorbier Community Council
- 1456 Mrs Debra Murphy
- 1513 Mr Kelvin Solov, The Newport and District Chamber of Trade and Tourism
- 1569 Mrs Elaine Ancrum, Welsh Assembly Government
- 1609 Ms Vicky Moller, Ethical Pembrokeshire
- 3183 Mrs Gaynor Lane

Question 5, Do you think we have set out the right approach to housing, in particular, affordable housing provision?

- 2025 Mr Richard Price, Home Builders Federation
- 3451 Ms Llinos Quelch, Ceredigion County Council
- 2671 Mr Matthew Owens, Pembrokeshire Rural Housing Enabler
- 2698 Mr Jake Hollyfield, West Wales ECO Centre
- 2708 Mr Stephen Hurr, Pembrokeshire County Council
- 2882 Mr N Thomas, Dinas Cross Community Council
- 2897 Mrs YC Evans, Marloes & St Brides Community Council
- 2902 Mr Peter Harwood, Newport Town Council
- 2906 Mr JC Griffiths, Saundersfoot Community Council
- 2910 Revd D Menday, St Davids & Cathedral Close City Council
- 1633 Ms Andrea McConnell, Countryside Council for Wales
- 3509 Mrs V Tomlinson, Freshwater East Society & Community Association
- 3397 Mr & Mrs G J L Barnes
- 3499 C A Hughes
- 3500 D R Divall
- 3502 Ms Amanda Jane Potts
- 3503 Mr Harry Thomas
- 3504 Mr Douglas I Benham
- 3505 Ms Kirsty Williams
- 3497 Mr Ray Hughes
- 3507 Mr Robert Brown
- 3496 Ms Nicola Hughes
- 3510 Mr Richard Evans
- 3511 Mr Harry F Gardiner, Tenby Civic Society
- 3515 Mr P M Harries
- 3522 Mrs J M Coleman
- 3524 Mr & Mrs TC & E Haynes
- 3527 Mr Gerald Codd, Pembroke Road Residents Committee (93 Signatories)
- 3564 Mr & Mrs A & A James
- 3565 Mr & Mrs AJ & ME Phillips
- 3506 Ms Laura Varney
- 3484 Ms Tracie Gough

Question 5, Do you think we have set out the right approach to housing, in particular, affordable housing provision?

- 3457 Mr John Ratcliffe, Friends of Pembrokeshire National Park
- 3467 Mr Peter Maggs, Pembrokeshire Housing
- 3468 Ms Mary Sinclair, Campaign for the Protection of Rural Wales
- 3469 Mr Chris Lambart, National Trust
- 3472 Ms Jill Morgan, Mathry Community Council
- 3475 Mr Robert Booth
- 3480 Mr & Mrs Brian Williams
- 3498 Ms Gemma Hughes
- 3483 Mrs S Thomas
- 3577 Mr & Mrs C & L Spillane
- 3486 Ms Sara Varney
- 3487 D M Briscoe
- 3490 Mr J Hughes
- 3491 Mr Danny Brown
- 3492 Ms Maisie John
- 3493 Mr B West
- 3494 Mrs P West
- 3495 Mr A West
- 3482 Mr Christopher Taylor

Question 5, Do you think we have set out the right approach to housing, in particular, affordable housing provision?

Main issues for question 5

Is housing provision in particular affordable housing provision adequately addressed in the Plan?

Some commentators refer to what is considered to be the inadequacy of provision while others consider that the National Park should be avoided for housing/affordable housing provision. The County Council consider that the Plan fails to provide for even its own communities' needs. Other commentators consider that the development should in any case be placed outside the National Park. Ceredigion County Council and Pembrokeshire County Council ask for the Authority to consider and discuss the implications of a housing provision figure which cannot keep pace with housing projection figures for the area. The Welsh Assembly Government refer to the need for regional agreement on housing projection figures.

Officer: Martina Dunne

Respondents raising this issue

- 3391 Mr John Pattenden
- 1308 Cllr Ray Hine, Manorbier Community Council
- 3524 Mr & Mrs TC & E Haynes
- 3405 Mr Ralph Parnell Davies
- 3385 Ms Penny Tighe
- 3384 Mr A H Horley
- 3359 Capt C Ennion
- 3341 Cllr Stephanie Halse
- 3261 Mr & Mrs Ian & Thalia Campbell
- 2708 Mr Stephen Hurr, Pembrokeshire County Council
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- 3451 Ms Llinos Quelch, Ceredigion County Council

Question 5, Do you think we have set out the right approach to housing, in particular, affordable housing provision?

Officer response

The housing provision of the strategy as identified so far does not meet the 2003 household projection figures when distributed on a pro-rata basis.

A further review of housing land supply is under way and this could go some way towards reaching the 2003 household projection figure which the County Council is concerned about. This is being done through a combination of increasing densities, additional new sites and making a calculation for windfall provision.

Officers also need to take into account new projection figures being produced by the Welsh Assembly Government (anticipated end of June 2008). More recent mid year estimates would suggest that there is little growth in population in the National Park. The County Council has also produced its own projections which Officers are not in receipt of to date.

A revised draft version of what was 'Appendix 7a and Appendix 7b' to the Preferred Strategy is attached to the Officer Appraisal of Q14 later in your report showing the emerging picture of supply. In addition to this Officers have been investigating opportunities for potential windfalls over the Plan period and this would amount to approximately 250 units.

Please note there are also outstanding issues to consider under the Potential Sites Assessment, for example, a screening assessment in relation to Habitats Regulation Assessments and an assessment of the compatibility with the Preferred Strategy.

The figure of potentially 225 affordable dwellings per annum is also a pro rata figure of that included in the Local Housing Market Assessment. The Local Housing Market Assessment only sets out scenarios to show what would happen if a certain level of provision is made and a key question asked of the Assessment is how quickly does the County wish to see the figures reducing. More importantly how realistic is it to suggest that the local market can sustain a more than doubling of housing completion rate to meet affordable housing needs alone. The figure of 225 requires further analysis to understand how this figure relates to local need within the National Park. Further discussions on this issue are being programmed with the County Council.

Officer recommendation

Update the housing provision figures (including the affordable housing provisions) to take account of the outcomes of the current review of housing land supply, the further analysis of affordable housing needs for the National Park area and the latest population projection figures.

Question 5, Do you think we have set out the right approach to housing, in particular, affordable housing provision?

Should affordable housing be provided in smaller Centres (Tier 4 Rural Centres and Tier 5 Countryside)?

Some commentators consider that these more rural areas do not have sufficient facilities available to support affordable housing. The Friends of Pembrokeshire National Park refer to the need for Centres to have basic services including a regular bus service. The National Trust queries how sustainable the distribution of housing is in general given the strategic objective of reducing the need to travel. The County Council asks if the Plan is failing to provide affordable housing those working in the National Park but living outside the National Park.

Officer: Martina Dunne

Respondents raising this issue

- 3261 Mr & Mrs Ian & Thalia Campbell
- 3385 Ms Penny Tighe
- 3524 Mr & Mrs TC & E Haynes
- 3522 Mrs J M Coleman
- 3469 Mr Chris Lambart, National Trust
- 3457 Mr John Ratcliffe, Friends of Pembrokeshire National Park
- 3405 Mr Ralph Parnell Davies
- 3384 Mr A H Horley
- 3335 Mr Brian Coleman
- 3182 Mrs Davina Gammon
- 2708 Mr Stephen Hurr, Pembrokeshire County Council
- 1308 Cllr Ray Hine, Manorbier Community Council
- 3359 Capt C Ennion

Officer response

See Officer Response to main issues under Question 2. See also the Officer Response to 'Is housing provision, in particular affordable housing provision adequately addressed in the Plan?' under this question.

Officer recommendation

See above.

Question 5, Do you think we have set out the right approach to housing, in particular, affordable housing provision?

Should affordable housing be prioritised for those living or working in the locality?

Commentators question the source of need identified in the Local Housing Assessment. Are those needing housing actually living or working or with the potential for work in the locality? Should the National Park only be providing for local need? Is this legally possible? Ceredigion and Pembrokeshire County Council ask what are the implications of need identified in the Local Housing Market Assessment not being accommodated in the National Park.

Officer: Martina Dunne

Respondents raising this issue

- 3511 Mr Harry F Gardiner, Tenby Civic Society
- 3524 Mr & Mrs TC & E Haynes
- 3182 Mrs Davina Gammon
- 3246 Mr Paul Woolman, The Havens Community Forum
- 3261 Mr & Mrs Ian & Thalia Campbell
- 3405 Mr Ralph Parnell Davies
- 3457 Mr John Ratcliffe, Friends of Pembrokeshire National Park
- 3480 Mr & Mrs Brian Williams

Officer response

See the Officer Response to 'Is housing provision, in particular affordable housing provision adequately addressed in the Plan?' under this question. In terms of 'local need' the provision can statistically reflect what is identified as 'local need'. The Authority is not intending to pursue a 'local needs policy' similar to that proposed under the Joint Unitary Development Plan for Pembrokeshire. In terms of controlling occupancy private developer proposals for affordable housing can be restricted as can housing association developments where Housing Association put in place a voluntary lettings agreement.

Officer recommendation

See above.

Question 5, Do you think we have set out the right approach to housing, in particular, affordable housing provision?

Is the Plan doing enough to make use of brownfield sites?

Some commentators consider that not enough use is being made of brownfield sites in preference to greenfield. Examples include the use of former hospital/hotel sites.

Officer: Martina Dunne

Respondents raising this issue

3359 Capt C Ennion

3384 Mr A H Horley

3385 Ms Penny Tighe

3391 Mr John Pattenden

Officer response

Some commentators advise of their perception that the Authority is not making use of brownfield sites and others advise they consider too much use is being made. The approach taken has been to seek to address housing and employment provision where possible on brownfield sites, where located in sustainable locations, before choosing greenfield.

Officer recommendation

No change is proposed to Chapter 4.

Can the National Park Authority make better use of ex Council houses and second homes?

Commentators refer to the need to use existing properties including Council houses, holiday lets and second homes. The sale of second homes should be restricted.

Officer: Martina Dunne

Respondents raising this issue

3182 Mrs Davina Gammon

3524 Mr & Mrs TC & E Haynes

3480 Mr & Mrs Brian Williams

3261 Mr & Mrs Ian & Thalia Campbell

1513 Mr Kelvin Solov, The Newport and District Chamber of Trade and Tourism

1308 Cllr Ray Hine, Manorbier Community Council

3405 Mr Ralph Parnell Davies

Officer response

Issues raised here are generally beyond land use planning.

Officer recommendation

No change is proposed to Chapter 4.

Question 5, Do you think we have set out the right approach to housing, in particular, affordable housing provision?

Should conversions in the countryside be used for affordable housing provision?

The Countryside Council for Wales has reservations about the sustainability of such proposals particularly having regard to low income families and their accessibility to transport and service provision.

Officer: Martina Dunne

Respondents raising this issue

1633 Ms Andrea McConnell, Countryside Council for Wales

Officer response

These concerns are shared which is why the reasoned justification refers specifically to access to services at the end of paragraph 4.42.

Officer recommendation

No change is proposed to Chapter 4.

Are the population projections for housing provision accurate?

The Home Builders Federation asks that the Authority consider Wales wide projections with base dates of 2004 and 2006.

Officer: Martina Dunne

Respondents raising this issue

2025 Mr Richard Price, Home Builders Federation

Officer response

See the Officer Response to 'Is housing provision, in particular affordable housing provision adequately addressed in the Plan?' under this question. Also the figures quoted are at an all Wales level and the picture for this National Park if recent mid year estimates are looked at is not reflective of the wider trends.

Officer recommendation

No change is proposed to Chapter 4.

Question 5, Do you think we have set out the right approach to housing, in particular, affordable housing provision?

Is using a 50% affordable housing target on sites appropriate?

The Home Builders Federation consider such a target to be too high and it may have an adverse effect on site viability. The Havens Community Forum considers that 50% could mean an overdominance of affordable housing and suggests 30% in any development over 3 dwellings instead. Pembrokeshire Housing Association asks for the percentage to be increased above 50%. The County Council refer to the need to consider other planning obligations that may be required and the requirement to meet EcoHomes standard also potentially having an adverse impact. The West Wales Eco Centre comment on the long term future costs of maintaining affordable housing.

Officer: Martina Dunne

Respondents raising this issue

2698 Mr Jake Hollyfield, West Wales ECO Centre

3467 Mr Peter Maggs, Pembrokeshire Housing

3246 Mr Paul Woolman, The Havens Community Forum

2025 Mr Richard Price, Home Builders Federation

2708 Mr Stephen Hurr, Pembrokeshire County Council

Officer response

A review of sites in Appendix 7a using the Three Dragons Toolkit shows that it is possible to secure 50% affordable housing. On larger sites this can generally be achieved without grant aid. This figure will be reviewed to ensure it is still appropriate following changes to the overall housing provision figure and the re-examination of affordable housing needs. The assessment included using the Ecohomes 'Excellent' Rating.

Officer recommendation

Review the appropriateness of a 50% requirement as set out in the Officer Response.

Question 5, Do you think we have set out the right approach to housing, in particular, affordable housing provision?

Is the affordable housing threshold of 2 units justified?

The Home Builders Federation considers that the threshold is unjustified. The Rural Housing Enabler asks that contributions towards affordable housing from single dwellings should be sought.

Officer: Martina Dunne

Respondents raising this issue

2025 Mr Richard Price, Home Builders Federation

2671 Mr Matthew Owens, Pembrokeshire Rural Housing Enabler

Officer response

Table 4 of the Housing Background Paper set out the rationale for choosing the threshold of 2 or more units. The Welsh Assembly Government has not objected to this approach. Given the likely changes in housing provision figures this threshold can be kept under review to ensure it is still considered justified.

On seeking contributions from single dwellings this is an area that could be explored further for the Deposit Version Local Plan.

Officer recommendation

Explore further in the drafting of the Deposit Version Local Plan.

Is it appropriate to allocate sites for under 10 units for 100% affordable housing provision?

The Home Builders Federation consider that given the level of housing need identified in the Local Housing Market Assessment and the supply identified in the Plan that this policy is in effect a blanket restriction on all housing sites under 10 units being required for affordable housing. Given that government policy advice is that this type of provision is likely to be small in number then the approach in the Plan is likely to be contrary to national planning policy.

Officer: Martina Dunne

Respondents raising this issue

2025 Mr Richard Price, Home Builders Federation

Officer response

Statistically looking at the housing provision and the amounts that would be needed for affordable housing then theoretically all 10 or under sites could be allocated for affordable housing. This however needs to be considered in light of viability issues and the review of housing provision figures overall currently underway which will mean that such allocations will be more selective than suggested, particularly as they will almost always need to be supported by Social Housing Grant. The Welsh Assembly Government has raised no objection to the principle of this approach.

Officer recommendation

No change is proposed to Chapter 4.

Question 5, Do you think we have set out the right approach to housing, in particular, affordable housing provision?

Are the proposals to promote housing development at 30 units to the hectare appropriate?

Some commentators although accepting of the necessity to increase density ask for provision to be made for allotments by way of compensation. The County Council advises that the review of potential sites has not applied this principle rigorously enough. The Havens Community Forum asks that the policy be applied with caution giving an example of what is considered to be a poorly designed cramped development in Little Haven.

Officer: Martina Dunne

Respondents raising this issue

3246 Mr Paul Woolman, The Havens Community Forum

3271 Ms Sandra Bayes, Newport Area Env Group

2708 Mr Stephen Hurr, Pembrokeshire County Council

3469 Mr Chris Lambart, National Trust

Officer response

The need for allotments will be assessed by the Recreational Open Space Assessment for the Local Development Plan. It is likely that a criteria based policy will be inserted to support such uses in principle. Provision would be responsibility of the County Council. Densities are being reviewed and the outcomes are contained in a revised 'Appendix 7a' to the Preferred Strategy attached to Question 14. The concerns of the Havens Community Forum are noted.

Officer recommendation

See Officer Response above.

Will the limited housing provision in the National Park lead to an increase in house prices?

The County Council consider that restrictions on the supply of properties in the National Park will lead to the price of existing housing stock rising, worsening the affordability problem.

Officer: Martina Dunne

Respondents raising this issue

2708 Mr Stephen Hurr, Pembrokeshire County Council

Officer response

House prices are generally higher in attractive locations such as a National Park. The level of development required to 'manipulate' prices would have to be at an unrealistic scale. Even Kate Barker has acknowledged this. Prices are driven from within the existing housing stock as the recent credit crunch has evidenced.

Officer recommendation

No change is proposed to Chapter 4.

Question 5, Do you think we have set out the right approach to housing, in particular, affordable housing provision?

Will there be an overreliance on Social Housing Grant in the National Park to the detriment of the remainder of the Pembrokeshire?

The County Council advise that given the number of smaller developments proposed, one consequence would be greater competition for Social Housing Grant which would potentially mean that less was available for the remainder of the County.

Officer: Martina Dunne

Respondents raising this issue

2708 Mr Stephen Hurr, Pembrokeshire County Council

Officer response

A review of the need for social housing grant to support developments is under way and will be discussed with the Housing Authority and the relevant Registered Social Landlords.

Officer recommendation

Discuss the implications of the housing provision figures including the affordable housing provision figures for Social Housing Grant with partner organisations.

Will the approach to housing provision cause increased pressure on infrastructure in the County Council's jurisdiction?

The County Council is concerned that the approach in the Plan (described as little future housing development) might place further pressure on infrastructure and services in non-National Park locations.

Officer: Martina Dunne

Respondents raising this issue

2708 Mr Stephen Hurr, Pembrokeshire County Council

Officer response

Generally such services are provided by the same organisations and regardless of where the development is proposed the demands would be the same. Issues regarding planning obligations are under discussion with the relevant County Council Officer as is the proposed housing land supply for the National Park area.

Officer recommendation

See Officer response.

Question 5, Do you think we have set out the right approach to housing, in particular, affordable housing provision?

Will the housing proposals of the Plan lead to a greater proportion of older people in the National Park?

The County Council consider that there may be a greater burden on social and health services if a greater proportion of elderly people reside in the National Park.

Officer: Martina Dunne

Respondents raising this issue

2708 Mr Stephen Hurr, Pembrokeshire County Council

Officer response

Areas such as the National Park tend to attract a greater number of older people for retirement. It is a fact of life. Given that the Plan cannot control the occupancy of new additions to general needs housing this will continue. It has no control over the occupancy of existing stock. Suggestions for local needs policy have been rejected by the County Council under the previous Plan. Planning obligations issues are being discussed with the relevant County Council Officer.

Officer recommendation

No change is proposed to Chapter 4.

Is the review of potential sites for development rigorous enough?

The County Council considers that there is too much focus on 'capacity' in the review of sites and refers to the approach currently underway by the Lake District National Park to find sites for their Local Development Plan Framework. S106 agreements can also assist in making landscaping provisions on sites. In cross boundary locations the County Council and Pembrokeshire Housing Association ask that opportunities in the National Park should not be discounted.

Officer: Martina Dunne

Respondents raising this issue

2708 Mr Stephen Hurr, Pembrokeshire County Council

Officer response

A review of sites is ongoing. National Park purposes will be paramount in such a review. Opportunities within settlements wholly or partly in the park are being explored. The Lake District approach has been checked and it is understood that it is not as described in the comment.

Officer recommendation

See Officer Response.

Question 5, Do you think we have set out the right approach to housing, in particular, affordable housing provision?

Has there been an 'Accommodation Needs Assessment of Gypsy Travellers' carried out?

The Welsh Assembly Government asks that documented consideration is given to addressing the needs of gypsies and travellers, including any collaborative work with neighbouring authorities.

Officer: Martina Dunne

Respondents raising this issue

1569 Mrs Elaine Ancrum, Welsh Assembly Government

Officer response

S 225 of the Housing Act places a duty on the Local Housing Authority, when undertaking a review of housing needs in their district ...to carry out an assessment of the accommodation needs of gypsies and travellers. This requirement came into force in Wales on 13 December 2007. Guidance on how to assess the accommodation needs of gypsies and travellers is provided by Appendix F of the Local Housing Market Assessment Guide March 2007. Discussions have commenced with the County Council regarding completing such a study.

Officer recommendation

Address any identified need in the Deposit Local Development Plan.

Points raised for question 5 outside the main issues

3397 Mr & Mrs G J L Barnes

Could not find Policy PS15.

Officer response

Unsure what the difficulty was.

Officer recommendation

No change is proposed.

Question 5, Do you think we have set out the right approach to housing, in particular, affordable housing provision?

3261 Mr & Mrs Ian & Thalia Campbell

Need should be first priority and housing provided to those living in or with work or potential work within the locality. Purchase existing council housing instead. Locate affordable housing where there are facilities. Use land outside the National Park in the County Council's jurisdiction. Agree a way forward in partnership with the County Council.

Officer response

Please see Officer Response to the main issues "Is there too little or too much emphasis on development?" Question 6. Purchasing Council housing is beyond the remit of land use planning. The aim has been to provide for affordable housing where access to such facilities is possible. The views of the County Council are evidenced throughout this Report of Consultations which are to avoid such development. Further discussions are underway.

Officer recommendation

See Officer Response.

2910 Revd D Munday, St Davids & Cathedral Close City Council

The priority for social housing is great in St Davids.

Officer response

Noted. The housing provision figures for St Davids are under review.

Officer recommendation

Please see detail under Question 14.

3359 Capt C Ennion

Location should be determined by a proven need for housing, which is not the case in Jameston. The scale of development proposed should have a far greater range of facilities available to support it. There is also no employment. Sewage disposal is inadequate.

Officer response

Issues regarding where development should be located are responded to under Question 3 'Is it appropriate to propose development in Tier 4 and Tier 5 locations?' Detailed issues on sites are dealt with under Question 14.

Officer recommendation

See Officer Response.

Question 5, Do you think we have set out the right approach to housing, in particular, affordable housing provision?

3359 **Capt C Ennion**

Location should be determined by a proven need for housing. There is a lack of facilities and employment to support development. There should be no need to infringe on the National Park to deliver need. Why is brownfield land not being developed?

Officer response

See Officer Response above. There is insufficient brownfield land.

Officer recommendation

See Officer Response.

2382 **Mr Andrew McCabe, Manorbier Conservation Group**

An explanation of why the Authority is seeking to tackle housing is needed. The Authority is not equipped to take on this role. The Authority is taking on an impossible task which will lead to the erosion of the Park.

Officer response

This is already provided in the Housing Background Paper and the Plan itself.

Officer recommendation

No change is proposed.

2382 **Mr Andrew McCabe, Manorbier Conservation Group**

Policy PS15 is not acceptable. The problems arising will erode the special qualities. The Manorbier area has more than its fair share of affordable housing. Provision has not been to meet local need. The Authority should only deal with truly local need in each area of the Park without taking outside requirements. There are plenty of houses but they are being used as second homes. Affordable housing is being boarded up in P Dock and Monkton.

Officer response

The Authority is obliged to consider affordable housing needs for its area where this is compatible with the National Park designation. The exact level of that is under review.

Officer recommendation

See Officer Response.

Question 5, Do you think we have set out the right approach to housing, in particular, affordable housing provision?

2916 **Mr Andrew Davies, Tenby Town Council**

The Council welcomes the emphasis on meeting the need for affordable housing, which is critically important to the Tenby community, and agree that new developments should make a substantial contribution to meeting that need.

Officer response

Noted.

Officer recommendation

No change is proposed.

1569 **Mrs Elaine Ancrum, Welsh Assembly Government**

With regards to housing provision, it is important to clarify the meaning of "local area" and "local need" (TAN2 paragraph 10.16-17).

Para 4.93 na policy PS15 9Housing) refer to phasing being required on some housing sites. Further clarification will be required in the deposit LDP.

Officer response

Agree. Address in the Deposit Version Local Development Plan.

Officer recommendation

See Officer Response.

1633 **Ms Andrea McConnell, Countryside Council for Wales**

Affordable Housing and Housing Provision

Para 4.86

As has been stated above, the location of new development needs to consider more than its landscape capacity, and needs to be considered in the context of the National Park's purposes, with weight being given to its first purpose, i.e. to conserve, enhance the natural beauty, wildlife and cultural heritage of the area, where there is any conflict between any of its purposes.

Officer response

As set out in the Background Paper on Potential Sites the assessment is wider than just landscape impacts. Elsewhere in the Report of Consultations some additional points of clarification are proposed which will be added to the Preferred Strategy.

Officer recommendation

See Officer Response.

Question 5, Do you think we have set out the right approach to housing, in particular, affordable housing provision?

1633 Ms Andrea McConnell, Countryside Council for Wales

Para 4.88 CCW supports the authority's aim to protect the National Park landscape and the provisional housing land figure. Para 4.89 CCW supports and welcomes the need to constrain development to take account of the need to protect the National Park.

Officer response

Noted.

Officer recommendation

No change is proposed.

1633 Ms Andrea McConnell, Countryside Council for Wales

Policy PS 15 Housing

CCW supports the principle of this policy, and have made comments regarding the individual housing site allocation below under the section relating to your appendix 7.

Officer response

Noted.

Officer recommendation

No change is proposed.

3468 Ms Mary Sinclair, Campaign for the Protection of Rural Wales

Until policies are in place which can prevent the re-sale of affordable homes at other than affordable prices; can prevent their extension to much larger and therefore more expensive homes; can prevent their use as seaside retirement homes; and can restrict their occupation to people working locally to avoid the need for expensive commuting - then your so-called 'affordable housing' will eventually turn into non-affordable homes and we will be left with a call for yet further development.

Officer response

These controls are already in place. Please refer to the Authority's Supplementary Planning Guidance on Affordable Housing which is already in operation.

Officer recommendation

No change is proposed.

Question 5, Do you think we have set out the right approach to housing, in particular, affordable housing provision?

3457 Mr John Ratcliffe, Friends of Pembrokeshire National Park

Generally, but see detailed comments relating to the feasibility of determining the scope of local need and where local need would not apply.4. Housing

The Friends support the policy of the Park Authority which states that it is unable to accommodate a pro rata allocation of new housing (never mind any accumulated backlog) because of the various restraints upon the Park in particular the landscape consideration; a point recognised in the Inspector's Report on the recent JUDP.

We also support the emphasis on providing affordable housing for local needs wherever there is a justified demand and that housing, especially affordable housing, should only be allocated / permitted in those centres which have basic services including a regular bus route.

A mechanism needs to be agreed for defining and operating any housing policies related to affordable housing / local needs housing / exceptions to general housing policy.

Officer response

Support noted. The current Affordable Housing Supplementary Planning Guidance will need to be reviewed for the Local Development Plan Deposit Version.

Officer recommendation

No change is proposed.

3195 Ms Sue Miles, South West Wales Integrated Transport Consortium

No comment.

Officer response

Noted.

Officer recommendation

No change is proposed.

2882 Mr N Thomas, Dinas Cross Community Council

No, 12 units within the Community of Dinas will not be sufficient for local needs.

Officer response

Please see issues on sites for Dinas Cross, dealt with under Question 14.

Officer recommendation

No change to Chapter 4.

Question 5, Do you think we have set out the right approach to housing, in particular, affordable housing provision?

2906 Mr JC Griffiths, Saundersfoot Community Council

Would expect to see the continued use of 'exception sites' and would not wish to see compulsory purchase of land (MP36).

Officer response

Opinion noted. Compulsory Purchase is a last resort option.

Officer recommendation

No change is proposed.

3467 Mr Peter Maggs, Pembrokeshire Housing

1. No new definition of affordable housing is offered. It is assumed that the definition in the JUDP and the Supplementary Planning Guidance will continue to apply.

Officer response

A summary definition is provided in the Glossary of Terms. Further guidance is needed in the Deposit Local Development Plan/ future Supplementary Planning Guidance.

Officer recommendation

See Officer Response.

3515 Mr P M Harries

I feel that the sites that have been previously included in the plan ie Tabor and Feidr Fawr Pary Eglwys had no significance to the so called affordable housing provision. There was no way that any local people could afford to buy them, so its not confronting the issue that there is a dire need for affordable housing for local people.

Officer response

These sites were not identified for affordable housing provision in the first instance.

Officer recommendation

No change to Chapter 4.

Question 5, Do you think we have set out the right approach to housing, in particular, affordable housing provision?

3271 Ms Sandra Bayes, Newport Area Env Group

The National Park should support the development of community land trusts which support community sustainability through providing affordable housing, employment and community facilities.

Officer response

The Authority has provided financial support in the past to an initiative in Newport.

Officer recommendation

No change to Chapter 4.

3183 Mrs Gaynor Lane

Affordable housing is a noble quest but in applying policy rules within the PCNP the policy rules should be to protect the Natational Park (tourism is its largest employer). The JUDP is inadequate and do not protect smaller areas of land of less than 1/2 hectare. This should be addresse in PS15. Where new sites are proposed this will be piecemeal development. Roads cannot cope nor other infrastructure. Small scale development would be preferable but not if repeated.

Officer response

The commentator appears to be referring to the loss of open space in Manorbier for a recent housing development for affordable housing. The proposal was approved in accordance with the Joint Unitary Development Plan policies. Open Space policies will be included in the Deposit Local Development Plan.

Officer recommendation

See Officer Response.

1513 Mr Kelvin Solov, The Newport and District Chamber of Trade and Tourism

Whilst there is a need for low-cost housing to be made available, this must be coupled with more full-time employment opportunities.

Officer response

A balance of uses is proposed in Newport although previous provision for employment land has had a slow take up.

Officer recommendation

No change is proposed.

Question 5, Do you think we have set out the right approach to housing, in particular, affordable housing provision?

2897 Mrs YC Evans, Marloes & St Brides Community Council

This Council is concerned with maintaining its community's culture; a resident population; family ties to the village (many families have been here for several generations) – we need local job provision/opportunities and affordable housing (in this village) to help achieve these goals. The issue of affordable housing is much more urgent than the Park seems to think.

Officer response

Comment noted. The Authority considers the need to address affordable housing to be very urgent indeed. The housing provision figures are being explored further to seek out additional opportunities.

Officer recommendation

See Officer Response.

2902 Mr Peter Harwood, Newport Town Council

There is considerable mention throughout, and rightly so, of the need to ensure an adequate supply of affordable housing within communities. However, without an acceptable definition of affordable, or for that matter what kind of prioritisation will be given to what type of affordability, for example: rent, purchase, eco-housing and so on, then it could be that only lip service will be paid in a free-market housing economy.

Officer response

There are already provisions in place in Supplementary Planning Guidance on Affordable Housing which addresses these issues. Similar guidance will be put in place in with the Deposit Local Development Plan.

Officer recommendation

No change to Chapter 4.

3388 Mrs Gwen Bond

No comment

Officer response

Noted.

Officer recommendation

No change.

Question 5, Do you think we have set out the right approach to housing, in particular, affordable housing provision?

3564 **Mr & Mrs A & A James**

See Q1 &14

Officer response

See Q1 & Q14.

Officer recommendation

No change.

3577 **Mr & Mrs C & L Spillane**

This should be sympathetically done to be in keeping with the local Saundersfoot area which is one of the outstanding natural beauty and charm. Efforts should be made to have affordable housing on sites which will not impact on views of the sea or countryside.

Officer response

Comment noted. A private right to a view is not a material planning consideration.

Officer recommendation

No change to Chapter 4.

3565 **Mr & Mrs AJ & ME Phillips**

See Q14 & Q1

Officer response

See Q1 and Q14.

Officer recommendation

See Q1 and Q14.

Question 5, Do you think we have set out the right approach to housing, in particular, affordable housing provision?

3509 Mrs V Tomlinson, Freshwater East Society & Community Association

Affordable housing is only needed for local employment (e.g. agriculture, tourism). In Freshwater East we consider it perverse to allow unnecessary building on land tht is valued for conservation and public enjoyment. Query whether powers exist to ensure that the encouragement of affordable housing does not result, long term, in the encouragement of second homes.

Officer response

Controls are in place regarding occupancy already on the delivery of affordable housing. Affordable housing is used for many reasons including local connections or wishing to care for a close relative. It is not just employment related issues.

Officer recommendation

No change is proposed.

307 Tenby Chamber of Trade and Tourism

We welcome the emphasis on meeting the need for affordable housing, agree that there is a backlog to be met, and agree that most new significant developments should make a substantial contribution to meeting that need.

Officer response

Support noted.

Officer recommendation

No change.

3304 Mr and Mrs JN and DM Bean

Could be more specific and more varied, more diverse "affordable housing" than we perhaps first consider, eg old peoples housing.

Officer response

Where regarded as in need of affordable housing then such provision could be counted. This provision already exists in the current Supplementary Planning Guidance on Affordable Housing.

Officer recommendation

No change to Chapter 4.

Question 5, Do you think we have set out the right approach to housing, in particular, affordable housing provision?

3500 **D R Divall**

Would suggest figures in Policy PS15© are still low compared with possible increase in present population.

Officer response

Comment noted. Housing provision figures are under review.

Officer recommendation

See Officer Response.

3527 **Mr Gerald Codd, Pembroke Road Residents Committee (93 Signatories)**

We do not understand why you have tried to squeeze in as much Housing as possible, based on the WAG population projections, when there is no legal compulsion to do so, and your primary duty is to conserve and protect the Park. Affordable housing needs are addressed elsewhere in our response.

Officer response

The context for affordable housing provision is set out in the Strategy and explained at length in a public meeting chaired by the commentator.

Officer recommendation

No change is proposed.

3524 **Mr & Mrs TC & E Haynes**

9. In any case only 1 affordable house is planned on site 436 and not on 730 which is likely to have big expensive houses on it.

Officer response

Detailed issues on sites are dealt with under Question 14.

Officer recommendation

No change is proposed.

Question 5, Do you think we have set out the right approach to housing, in particular, affordable housing provision?

1092 **Bourne Leisure Limited**

No comment

Officer response

Noted.

Officer recommendation

No change is proposed.

3482 **Mr Christopher Taylor**

All these policies will remain useless unless there is a legal framework to ensure that low cost housing remains precisely that - as far as I can recollect nearly all the 'low cost' housing that has been built over the past few years is already owned as holiday homes!!

Officer response

Not sure what specific development the commentator is referring to. Detailed Supplementary Planning Guidance on Affordable Housing is adopted by the Authority which sets out controls on occupancy.

Officer recommendation

No change to Chapter 4.

3483 **Mrs S Thomas**

A mix of housing types provide the best chance of being accepted into smaller settlements.

Officer response

Comment noted although in some instances the Authority is suggesting 100% on smaller sites.

Officer recommendation

See Officer Response.

Question 5, Do you think we have set out the right approach to housing, in particular, affordable housing provision?

1609 **Ms Vicky Moller, Ethical Pembrokeshire**

As above re location, but also a rapid move to place housing stock into something like community land trusts to ensure it is used to protect communities and their ability to use the land ecologically and productively.

Officer response

Land use planning has no controls over the existing housing stock. The Authority is supportive of Community Land Trusts.

Officer recommendation

No change is proposed.

3475 **Mr Robert Booth**

The case for the large amount of housing developments in the National Park is not made.

Officer response

No evidence is provided to justify this position.

Officer recommendation

No change is proposed.

Question 5, Do you think we have set out the right approach to housing, in particular, affordable housing provision?

140 **Mr Paul Sherrington, Forestry Commission in Wales**

General comment

The Forestry Commission is committed to assisting the Welsh Assembly Government deliver its affordable housing policies utilising the WAG woodland estate, managed by the Forestry Commission.

The Commission supports the inclusion of rural exception policies in rural areas.

The Forestry Commission would like to encourage the Council to identify land within Forestry Commission control, which adjoins or is close to existing settlement limits, for affordable housing, if suitable opportunities exist.

The provision of affordable housing in Pembrokeshire Coast National Park Authority is a fundamental issue which needs to be addressed in the LDP and which is afforded a high priority by the Welsh Assembly Government.

Policy wording comment

Criterion c) should be amended to allow for the exceptional release of land adjacent to as well as within individual centres as this would reflect national guidance.

Officer response

Comments noted. So far no suitable sites have come forward. Agree regarding amendment to Policy PS15 c).

Officer recommendation

See Officer Response.