**PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY**



**A REPORT BY THE SCRUTINY COMMITTEE ON AFFORDABLE HOUSING**

**September 2013**

**Foreword**



**Ted Sangster**

**Chairman of the Scrutiny Committee on affordable housing**

This scrutiny review was the first to be undertaken by the Pembrokeshire Coast National Park Authority on its own since completing two joint reviews with the Brecon Beacons National Park Authority in 2010/11. It was a big learning curve for the Scrutiny Committee, and the lessons learned will be taken into consideration at the next review.

In developing the conclusions and recommendations contained in this report we have relied on the evidence given to us by a number of individuals and organisations who have been willing to come and talk to us or submit written evidence. On behalf of the Scrutiny Committee, I would like to thank all of those who have contributed and we hope that the content of the report reflects the contributions made. The Committee also received invaluable support from officers, in particular Mrs Caroline Llewellyn to whom we offer our thanks for arranging the host of contributors and/or contributions to the whole process.

**CONTENTS**

|  |  |  |
| --- | --- | --- |
| **Section** | | **Page** |
| **No.** | **Heading** |
| 1. | Introduction | 4 |
| 2. | The process | 4 |
| 3. | Evidence considered | 5 |
| 4. | Conclusions | 6 |
| 5. | Recommendations | 6 |
| 6. | Pembrokeshire Coast National Park Local Development Plan Policy 45 Affordable Housing | 7 |
| 7. | The housing market in Wales | 10 |
| 8. | Delivery of affordable housing | 11 |
| 9. | Affordable housing policies elsewhere | 13 |
| 10. | Negotiation | 14 |
| 11. | Our officers | 19 |
| 12. | Social Housing Grant | 20 |
| 13. | Land availability | 21 |
| 14. | Developers | 23 |
| 15. | Perception and advice | 24 |
| 16. | Information on, and explaining our, policies | 25 |
| 17. | Reduce the impact of perceived barriers – design standards | 25 |
| 18. | Viability assessments and the use of the Three Dragons Development Appraisal Toolkit | 26 |
| 19. | Financing developments and take up of affordable housing | 27 |
| 20. | The right to buy | 28 |
| 21. | Review of the scrutiny process itself | 28 |

|  |  |  |
| --- | --- | --- |
| **Appendix** | | **Page** |
| **No.** | **Heading** |
| 1. | Welsh Government advice on the Local Development Plan review process | 29 |
| 2. | LDP affordable housing targets – comparison between Pembrokeshire Coast National Park Authority and Pembrokeshire County Council | 30 |
| 3. | Case summary from ‘Recent developments in planning case law’ | 31 |
| 4. | Percentage requirement for affordable housing – comparison with other planning authorities | 32 |
| 5. | Portfolio of potential affordable housing development sites available in Pembrokeshire (as at November 2012) | 35 |
| 6. | Affordable housing provision in Wales 2011/12 | 38 |
| 7. | Land availability in Pembrokeshire | 39 |
| 8. | Possible actions – Affordable Housing Scrutiny Committee (as at May 2013) | 45 |

**1 Introduction**

1.1 The Pembrokeshire Coast National Park Authority is made up of 18 Members, 12 of whom are appointed by Pembrokeshire County Council, with the remaining 6 Members being appointed by Welsh Government.

1.2 National Park Authorities are not required to operate an executive model of governance, and all decisions are made by the 18 Members as the National Park Authority. The lack of an executive, whilst ensuring the highest level of democratic accountability, means that the ‘traditional’ scrutiny model of challenging decisions could be perceived as lacking objectivity.

1.3 In light of this, the Pembrokeshire Coast and Brecon Beacons National Park Authorities made a bid to the Welsh Government’s Scrutiny Development Fund in order to develop a scrutiny model that would work for National Park Authorities. Following two successful joint scrutiny reviews[[1]](#footnote-1), the Pembrokeshire Coast National Park Authority established two Scrutiny Committees of nine Members each, so that every Member would have the opportunity to take part in at least one review during their term of membership. The Committees will run consecutively as the Authority does not have a dedicated scrutiny team to support the process.

1.4 The Scrutiny Committees are required to gather the necessary evidence and report their findings, with any possible recommendations, to the National Park Authority for consideration.

1.5 At the Authority’s meeting held on the 8th August 2012, affordable housing was chosen out of a number of suggestions for the first review topic.

**2. The process**

2.1 The Scrutiny Committee met on the 22nd August 2012 to carry out the initial scoping exercise for the review. It was agreed that the aim of the review would be to “consider the effectiveness of the delivery of the Authority’s policy on affordable housing against the original objectives and targets defined in that policy”.

2.2 The second meeting, held on the 12th September 2012, enabled Members to better understand the context to the Authority’s current affordable housing policy as defined in its Local Development Plan, together with the evidence gathered which led to the policy being finalised, and other relevant background information.

2.3 The Committee met on four further occasions (the 28th November 2012, the 23rd January 2013, the 6th March 2013 and the 10th April 2013) to take evidence from a range of individuals and organisations before meeting for the final time on the 11th September 2013 to discuss the final report to be presented to the National Park Authority for consideration.

2.4 Everyone who presented evidence, whether personally or by written submission, were provided with details of the areas/issues that the Committee wished to cover beforehand. Follow up questions were raised with those who provided evidence in person.

**3. Evidence considered**

3.1 Evidence was presented in person by:

* Lyn Hambidge, Head of Housing Commissioning, Pembrokeshire County Council
* Matthew Owens, Rural Housing Enabler
* Peter Maggs, Chief Executive, Pembrokeshire Housing Association
* Gareth Thomas, Development Manager, Tai Cantref Housing Association
* Peter Hughes, Managing Director, Principality Building Society and Chair of the Council of Mortgage Lenders Cymru
* Andrew Crompton, Persimmon Homes
* Jamie Edwards, local developer
* Philip Williams, Property Review Manager, Pembrokeshire County Council
* Sue Finch, Policy Officer (Housing), Welsh Local Government Association
* Lin Cousins, Director, Three Dragons
* Julie Nicholas, Chartered Institute of Housing Wales

3.2 Written evidence was received from:

* Richard Price, Home Builders Federation
* Guy Thomas, South Meadow Homes Ltd
* Head of Affordable Housing, Welsh Government

3.3 Other evidence provided to the Committee included:

* Definition of affordable housing from Technical Advice Note 2
* Pembrokeshire Coast National Park Local Development Plan – housing chapter and background documents which fed into the formulation of the affordable housing policy
* Supplementary Planning Guidance on Affordable Housing in the Pembrokeshire Coast National Park
* Use of the Three Dragons Development Appraisal Toolkit
* Affordable housing policies being used elsewhere in Wales

**4. Conclusions**

4.1 The Authority’s Local Development Plan affordable housing policy, Policy 45, is not fully achieving its key outcome in terms of the number of affordable homes anticipated as being built or under construction by the end of the financial year 2014/15. The evidence shows that the delivery of affordable housing is currently falling short of the Authority’s target.

4.2 Many reasons have been suggested for this as part of the evidence submitted to us. Some of these, e.g. current economic conditions, lending and investment, are outside the sphere of influence of the National Park Authority. However, there are other areas where we think the Authority can improve the effectiveness of its role in the delivery of affordable housing and these are set out in our recommendations below.

**5. Recommendations**

5.1 That a Communications Plan is drafted:

* to explain to, and educate, third parties on the Authority’s stance in respect of our policies on, and approach to, affordable housing in order to counter some of the misunderstood views held about us;
* to engage with landowners, developers and contractors to help and explain what is required, as the perception and lack of understanding is seen as a barrier to some to even consider participation, and
* to actively encourage developers and landowners to bring forward sites for development, which include affordable housing.

5.2 That representations should be made to Welsh Government at the earliest opportunity about the need for partial review procedures to be put in place as soon as possible – particularly the importance of including legislation in the forthcoming Planning Reform Bill to permit such partial review.

5.3 That officers be authorised to initiate the necessary preparatory work leading up to the review of the Local Development Plan and, as part of the preparation for that review, consideration should be given to varying the percentage of affordable housing required in the Local Development Plan’s allocations.

5.4 That officers should routinely report on the ways in which they have encouraged/initiated discussion and negotiation on agreeing affordable housing proportions or contributions.

5.5 That the Authority should debate the issue of maintaining targets for dealing with applications within a given time period against it being acceptable to miss such targets if, in doing so, it is likely that an agreed way of delivering affordable housing as part of a development application can be achieved.

5.6 That a paper is drawn up incorporating the relevant findings in this report in order to form the basis of an engagement with Welsh Government to seek support and, where necessary, changes in policy to enhance and improve the delivery of affordable housing in the National Parks and other rural areas.

5.7 That the Authority explores opportunities to work in partnership with Pembrokeshire County Council to release some of their land for development purposes.

5.8 Practical examples of good design should be included in a revised Supplementary Planning Guidance.

5.9 That the Authority actively engages with the finance sector either direct, through government or linked agencies (e.g. Finance Wales) to work towards a better understanding of the need for financing of affordable housing and an agreed means of providing for it.

**6. Pembrokeshire Coast National Park Local Development Plan Policy 45: Affordable Housing**

6.1 Affordable housing is defined in our Local Development Plan as housing for sale or rent at prices below the market rate. It will be reserved in perpetuity by the use of Section 106 agreements (or planning conditions) as affordable housing where a private developer is involved. Housing Associations will not be required to enter into such obligations but may wish to enter into voluntary lettings agreements. Affordable housing will be provided for local people currently in unsuitable housing who cannot afford to resolve their housing needs in the open market.[[2]](#footnote-2)

6.2 It is made clear in the Planning Handbook[[3]](#footnote-3) prepared by the Welsh Local Government Association that affordable housing is where there are secure mechanisms in place to ensure that it is accessible to those who cannot afford market housing, both on first occupation and for subsequent occupiers.

6.3 The Handbook also makes it clear that affordable housing includes social rented housing and ‘intermediate housing’ where the price or the rent is above that of social rent but below market housing prices or rents.

6.4 The need for affordable housing is assessed from a variety of sources but particular reliance is placed on the housing register in Pembrokeshire. Figures from Pembrokeshire County Council show that of their housing needs analysis of 469 applications within the National Park, some 27% would be interested in Low Cost Housing Options.

6.5 Our Local Development Plan, which is the statutory development plan for the Pembrokeshire Coast National Park area, was adopted in September 2010, becoming the first in Wales under the new LDP system. An important principle in its preparation was that of “deliverability”, and site delivery was integral to the way that the plan was produced.

6.6 The Authority’s affordable housing policy, Policy 45, makes use of mechanisms to help deliver affordable housing. They are:

* LDP Policy 45 seeks to negotiate a minimum of 50% affordable housing (in certain specified centres the level is higher, rising to 100% in one location) as part of all developments of 2 units or more – there are currently permissions in place for 35 affordable dwellings.
* Negotiating exceptional land releases for affordable housing. There are two sites being considered at present and two sites have been completed.
* Requiring an affordable housing contribution of £250 per square metre from single dwelling developments. Only three such contributions have been received since the policy came in on 1st October 2011.

6.7 The significance of the 50% target is that it defines which delivery route applies. For sites which provide only a single dwelling, the contribution route is activated (this is also subject to viability testing), while for proposals for 2 or more dwellings, the route involving a proportion of affordable homes as part of the development is activated. Evidence on negotiations is detailed under Section 10 Negotiation.

6.8 The Scrutiny Committee has received evidence through the views and opinions of a wide range of stakeholders as outlined in the notes of the meetings held. As can be seen from the minutes of these meetings, while there is general recognition and support for our overall policy aims, there is almost universal concern from those who are impacted that it was developed in significantly different times when the economy was much more positive. The view expressed by a number from whom we took evidence was that Policy 45 is no longer fit for purpose and requires readjustment.

6.9 Whilst officers quite rightly pointed out that LDPs were evidence-based our policies would have been relevant at the time we incorporated them but of course we did so very early and well before most other authorities in Wales. It was pointed out to us that as a consequence the market and economy assumptions on which they were based are now no longer as relevant.

6.10 The Authority’s evidence base date for viability testing for Policy 45 of the Local Development Plan was prepared at the end of 2007/early 2008 with an update provided for the Local Development Plan’s Examination in 2010.[[4]](#footnote-4) The Authority provided the Local Development Plan Inspector with evidence which showed the effect of market values reducing to 90%, 80% and 70% of the 2007 housing price levels. At the time of Examination house prices had reduced by 13% to 87% of Jan 2008 prices. At this level the Authority had demonstrated that the allocations remained viable, though obviously the returns to land owners would be less.[[5]](#footnote-5) The figure for 2012 is that the 2012 price as percentage of 2007 price is 91%.

Table 1 – Median sale price 2007 versus 2012 \*\*note these are financial years\*\*

|  |  |  |  |
| --- | --- | --- | --- |
| House type | Median sale price | | 2012 price as percentage of 2007 price |
| 2007 | 2012 |
| Detached | £287,000 | £240,000 | 84% |
| Semi-detached | £182,500 | £185,000 | 101% |
| Terraced | £189,000 | £172,500 | 91% |
| Flat | £192,500 | £158,500 | 82% |
| All types | £230,000 | £210,000 | 91% |

6.11 The Local Development Plan provides for a review of the Plan by the end of the financial year 2014/15 where the number of affordable homes built or under construction is below 80% of the proportion of the overall target for the Plan period which should be available by that date. It is highly likely that this will be the case given current rates of development. Welsh Government is currently considering the need to draft regulations for partially reviewing Local Development Plans.[[6]](#footnote-6) We were advised by Officers that the Inspector recommended that the LDP policies should be reviewed in due course, but that Welsh Government has not yet identified and confirmed the process whereby any changes identified as a result of any such review could be implemented and that it is not envisaged that they will get round to doing so until the summer of 2014.

6.12 At the meeting held on the 11th September 2013 officers reported on the current situation with regard to partial review of the affordable housing policy (see Appendix 1).

6.13 In this we also recognise that the current policy contains elements of flexibility, negotiation and viability to deal with changing circumstances – even though such flexibility is not well recognised by users/applicants. Nor are there many examples drawn to our attention where it has been successfully applied to bring about developments that would otherwise not have taken place.

6.14 One possibility therefore which can be actioned without any delay is to review and update the SPG taking account of what we have learnt through the scrutiny process and to ensure that our approach is absolutely clear, that procedures are easy to follow and that misunderstandings which came out in the evidence sessions are dispelled.

6.15 Some Members were of the view that, in developing or revising policies, consideration should be given to the risk involved in being a leader, thereby setting the scene for others to follow, reject or modify, as against a follower learning from the approach of others and modifying, adopting or ignoring it to meet one’s own objectives and circumstances. In addition, policies should contain the ability to be flexible to meet changed circumstances throughout their life, and to do so at the time of those changing circumstances rather than necessarily sticking to set review dates and this should be built in to any approval process by Welsh Government.

6.16 Other Members considered that, while there were risks in being a leader, there were also opportunities and benefits; being the first planning authority to adopt its Local Development Plan had enhanced the Authority’s reputation, whilst other planning authorities were being criticised by Welsh Government for not yet finalising theirs. It was also considered that the Authority’s policies had the flexibility needed to accommodate changes to economic circumstances, although it was accepted that this fact might not be abundantly clear to developers.

6.17 **Recommendation:**

**Representation should be made to Welsh Government at the earliest opportunity about the need for partial review procedures to be put in place as soon as possible – particularly the importance of including legislation in the forthcoming Planning Reform Bill to permit such partial review.**

**7. The housing market in Wales**

7.1 Welsh Government confirmed to us that housing markets in general are depressed and new house building is at a low point. This was repeated by many of the developers, builders, housing associations and local authority from whom we took evidence.

7.2 The view was expressed to us by many of those giving evidence that there is little hope that the situation will improve in the foreseeable future.

7.3 As a background to the current situation prior to 2007 – 08, both housing starts and completions were relatively stable in Wales, with between nine and ten thousand starts a year and around eight thousand homes completed. It is noticeable that as the country was hit by an economic downturn the number of starts fell steeply; dropping to an all-time low of 4,910 starts in 2008-09. It can also be seen that there has been a reduction in the number of planning applications being submitted and the number being granted planning permission over recent years.[[7]](#footnote-7)

Chart 1 – Number of new dwellings started and completed annually

Chart 1 - This is a line chart showing the number of new dwellings started and completed annually. Starting at 2003-04 to 2012-13

Source: New house building collection from local authorities & NHBC

7.4 Recent reports would suggest that housing markets may be becoming more buoyant across the UK, especially in London and the South East.[[8]](#footnote-8) The nature of the housing market over the lifespan of the Local Development Plan is and will be the subject of much conjecture and conflicting forecasts.

**8. Delivery of affordable housing**

8.1 The delivery of affordable housing is a key priority for the Pembrokeshire Coast National Park Authority’s Local Development Plan.

8.2 The target for affordable housing delivery in the National Park Authority’s Local Development Plan is 530 affordable houses over the Plan period (until 2021) with 80% of the provision planned for delivery by the end of the financial year 2014/2015 to be either built or under construction.[[9]](#footnote-9) This ambitious target arises from the Authority’s objective to aim to meet the affordable housing needs of the National Park.

8.3 This would mean that an estimated 228 affordable dwellings would need to have been built or under construction between 2007 and 2015 – an average of 28 completed affordable dwellings per year in order to achieve the Plan’s target provision.

8.4 Between 2007 and 2013 a total of 289 houses have been completed of which 8% (21) are affordable. A total of 195 houses are under construction of which 16% (32) are affordable units.[[10]](#footnote-10)

Table 2: Annual Overall Completions and Affordable Housing Completions 2007 to 2013

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | Target Annual Completions | Completions Recorded | Target Annual Affordable Completions or under construction | Affordable Completions or under construction recorded |
| 2007-2008 | 90 | 106 | 28 | 0 |
| 2008-2009 | 90 | 80 | 28 | 14 |
| 2009-2010 | 90 | 39 | 28 | 7 |
| 2010-2011 | 90 | 26 | 28 | 0 |
| 2011-2012 | 90 | 26 | 28 | 0 |
| 2012-2013 | 90 | 12 | 28 | 32 |
| Total | 540 | 289 | 168 | 53 |

8.5 A comparison with Pembrokeshire County Council’s Local Development Plan targets on affordable housing can be seen at Appendix 2.

8.6 The Rural Housing Enabler indicated that what is termed as “hidden housing need” amounts to an extra 82% of those on the Common Housing Register as identified in local housing needs surveys. Officers confirmed that in preparing the Local Development Plan account had been taken of these local housing needs surveys. No new local housing needs surveys for the National Park have been published since the Pembrokeshire Coast National Park Local Plan was adopted.

8.7 Exceptional land releases generally tend to take time to come forward. Of 25 planning authorities in Wales 5 authorities identified exceptions sites delivered during 2011-12.[[11]](#footnote-11) Two exceptions sites at Llanychaer and Crosswell have been completed in recent years in the National Park. Proposals continue to be explored many of them instigated by the Rural Housing Enabler.

8.8 Pembrokeshire County Council is currently seeking funding to explore ways to encourage the release of exceptions sites which is welcomed. This Authority is party to that bid.

8.9 The affordable housing contributions[[12]](#footnote-12) element of Policy 45 has been implemented from October 2011. The Authority anticipated that an estimated 15 applications per year (for single dwelling units) were likely to be considered under this aspect of the Policy. Two contributions have been paid and contributions are now required on an additional 8 permissions.[[13]](#footnote-13) One of the reasons for this relatively modest achievement is undoubtedly the lower completion rates being experienced in the economic downturn.

8.10 There was a personal view expressed by Peter Hughes of the Principality Building Society that the required £250 per square metre payment towards affordable housing provision from a single unit development seems “a bit steep” – although a recent challenge on this issue has been overturned by the Planning Inspectorate (see Appendix 3 for a case summary).

8.11 In conclusion the Authority’s overall housing completion rate to March 2013 is merely 53% of the total target for that period which in part is reflective of wider economic conditions. This Authority is achieving just 31% of the affordable housing target of the Local Development Plan for the period 2007 to 2013. The general view from the developers who commented was that it will probably decline even further in the years ahead. However, no quantitative evidence was provided to the Committee to support this view point.

8.12 While the overall target is for the whole Plan period it is clear that the anticipated annual average rate to achieve the cumulative end result is falling behind thus making it unlikely that the overall targets can be achieved by the end of the Plan period.

**9. Affordable Housing Policies elsewhere**

9.1 Some commentators strongly advised that a reduction in the policy % would act as a stimulus to interest in developing in the Pembrokeshire Coast National Park. The Housing Associations considered that 20% of something was better than 50% of nothing. It was also suggested that a reduction from the basic 50% target could even be introduced as a temporary or geographically targeted measure. In the view of many witnesses (as seen in the minutes of the hearings) the end result of any such changes would be more affordable housing units than the system is delivering under the current policy. However, this view was not supported by evidence to the Committee.

9.2 We were told by Lin Cousins of Three Dragons that compared with other Local Authorities we have a very high ambition and target – and certainly more so than other National Park Authorities. Brecon Beacons for example require a level of between 10% – 30%. It also refers to 100% requirements. To clarify this is the percentage requirements on site and not the overall target for the Plan.

9.3 In particular there was a lot of comment, indeed criticism that we “have pitched the bar too high” in requiring 50%+. It was suggested that a more modest target of say 20-25% would have been both more realistic and also produced more affordable housing as a result than has been experienced with the implementation of our current levels. We were told by Gareth Thomas (Tai Cantref Housing Association) and Peter Maggs (Pembrokeshire Housing Association) that Ceredigion have a 20% level.

9.4 We were advised by Lyn Hambidge, Head of Housing Commissioning, Pembrokeshire County Council, that the County Council’s adopted Local Development Plan (p 107) requires between 5%-25% for affordable housing on sites allocated for residential development, and for unallocated sites the requirement is for 10% in towns, Service Centres and Service Villages, 50% in Large Local Villages and full allocation in Small Local Villages.

9.5 Officers have carried out some research to check what percentages are used by other planning authorities both in Wales and in National Park Authorities both in Wales and the UK (see Appendix 4).

9.6 From the figures given in Appendix 4 there is very clear evidence that the affordable housing target has not been met and the general view from the developers, who gave us their views in evidence, is that the development of affordable housing will probably decline even further in the years ahead.

9.7 While the overall target is for the whole Plan period it is clear that the anticipated annual average rate to achieve the cumulative end result is falling well behind thus making it extremely unlikely that the overall targets can ever be achieved by the end of the Plan period.

9.8 **In light of the advice given by officers (see paragraph 6.13), we recommend:**

* **That the National Park Authority authorises officers to initiate the necessary preparatory work leading up to the review of the Local Development Plan, and**
* **As part of the preparation for that review, consideration should be given to varying the percentage of affordable housing required in the Local Development Plan’s allocations.**

**10. Negotiation**

10.1 The Planning Handbook from the Welsh Local Government Association advises (p 71) that recent experience demonstrates that when the development sector is depressed and land values fall the ability of developers to meet the affordable housing targets and still achieve a viable development is very much restricted. This has led to agreements about the level of affordable housing being renegotiated.

10.2 The impression appears to be by some of those that provided opinion to the Committee that potential developers and applicants are put off by the headline percentage requirements.[[14]](#footnote-14) Some landowners and developers may also be delaying schemes hoping for better returns in the future, perhaps with fewer planning constraints.

10.3 LDP policy 45 seeks to negotiate a minimum of 50% affordable housing (in certain specified centres the level is higher, rising to 100% in one location) as part of all developments of 2 units or more, and an equivalent contribution to affordable housing provision in respect of single dwelling sites. However, the penultimate paragraph of policy 45 indicates that, whilst a high priority will be given to the delivery of affordable housing, in certain circumstances an element of flexibility as regards other scheme requirements may exist where the development would otherwise be financially unviable. Moreover, the wording of policy 45 indicates that the level of affordable housing required may involve an element of negotiation. This enables a degree of flexibility to be applied in practice where absolute insistence on the identified level of provision sought by policy 45 in a particular instance can be demonstrated to render a proposed scheme unviable. Supplementary planning guidance subsequently produced by the National Park Authority also confirms a degree of flexibility, for instance by a rounding-down of the number of affordable units required, which particularly in the case of smaller sites can have a significant effect on overall scheme viability.[[15]](#footnote-15)

10.4 In summary, Policy 45 of the Local Development Plan and its supporting guidance contain elements of flexibility, to allow for negotiation and viability testing that means the policy can be applied to changing circumstances. However, this flexibility is not well recognised by potential users/applicants.

10.5 Information held by the Authority on pre-application and application discussions regarding affordable housing show that during the financial year 2012-13 Officers commented on an estimated 14 proposals[[16]](#footnote-16) of which 3 proposals are expected by the Authority to make an affordable housing provision in accordance with Policy 45 Affordable Housing based on current information available. In so far as the remainder of the proposals had been progressed a reduced requirement was identified for 9 proposals. Discussions on 2 proposals were insufficiently developed to know whether full affordable housing provision was likely to be required.

10.6 One possibility therefore could be to effect any desired changes through the Supplementary Planning Guidance taking account of what we have learnt through the scrutiny process and to ensure that our approach is absolutely clear, that procedures are easy to follow and that misunderstandings which came out in the evidence sessions are dispelled.

10.7 The Committee heard from some who gave evidence that their view was that our planning process may hinder the flexible approach that our policies allow for.

10.8 Officers advise that should a developer wish to negotiate with the Authority over the provision of affordable housing, this should be done in the pre-application stage rather than during the processing of an application once it has been registered. The Authority has taken this position on all negotiations in respect of amendments on a whole range of issues, to both enable timely decisions to be made in line with Welsh Government targets and in the interests of transparency as subsequent amendments once an application is registered can cause confusion and delay particularly with consultees.

10.9 This is an issue that could be usefully debated by the Authority as to whether it is more important to meet completed process targets or where there is a real possibility of negotiating an agreed route to delivering affordable housing.

10.10 We were told by Pembrokeshire County Council officials that land owners are intentionally not bringing land forward because the 50 % affordable housing policy requirement puts them off. We need to find a way of encouraging these people to come and talk to our officers about our policy and how it is applied.

10.11 The County Council’s Property Section is of this view as whilst they are motivated to look to the provision of affordable housing they are also duty bound to obtain the best capital receipt which means that land “could not simply be given away” and our policy of seeking to achieve a 50% provision means that these two aims cannot be achieved – so developments do not take place.

10.12 Lyn Hambidge, Head of Housing Commissioning, Pembrokeshire County Council advised that most affordable housing schemes throughout the County were on land owned by the local authority as this helped to keep land values low, however she did acknowledge that there was a tension within Pembrokeshire County Council between the provision of affordable housing on its own sites and the need to generate revenue to spend on, for example, education and social care.[[17]](#footnote-17)

10.13 At the time the Pembrokeshire Coast National Park Local Development Plan was adopted the local authority (Pembrokeshire County Council) owned circa 44% of the land allocated in the Plan. This would provide for a total of 316 dwellings, 187 of which would be affordable housing.

10.14 From that portfolio provided by Pembrokeshire County Council to the Scrutiny Committee (copied at Appendix 5) only one site at Crymych is now being brought forward by Tai Cantref Housing Association.

10.15 Although we were told that landowners may have unrealistic expectations in that the “hope value” that landowners had was higher than can be realised by developers within the existing policy system the fact some landowners are holding back in bringing developments forward needs to be addressed.

10.16 Officers propose to carry out a ‘re-run’ of the Three Dragons Development Appraisal Toolkit to include any established increases in costs since Plan adoption. This could include any increased building costs where those cost have been established along with any new information from the Authority’s Land Allocation Implementation Study[[18]](#footnote-18). The product of this exercise will be communicated to the relevant landowners and developers for the Local Development Plan’s housing allocations.

10.17 A written statement was recently published by Carl Sargeant, Minister for Housing and Regeneration,[[19]](#footnote-19) advising that he will introduce, through amendments to Part L of the Building Regulations, a requirement to reduce greenhouse gas emissions by 8% from 2010 levels. This is lower than the 40% originally consulted upon. The statement advises that this will have a close to neutral effect on building costs.

10.18 The statement also advises that, in relation to the introduction of sprinklers, from April 2014, the regulations will apply to high risk properties such as care homes, new and converted student halls of residence, boarding houses and certain hostels and from January 2016 to all new and converted houses and flats. This phasing will allow the house building industry to gain experience and skills, and gives the sector the opportunity to innovate and reduce the costs of sprinklers.

10.19 Officers advise that build costs within the Three Dragons Development Appraisal Toolkit (as explained under Section 18 below) are taken from data provided by the Building Cost Information Service of the Royal Institute of Chartered Surveyors, which is derived from tenders for construction work. As and when new requirements are introduced the increased standard build costs these will be taken into account within any subsequent tenders and therefore be included in future releases of build cost data by BCIS, i.e., the cost of e.g. sprinkler systems will be automatically included when the Three Dragons Development Appraisal Toolkit is updated. The fact that the BCIS data is derived from tenders for building work adds the dimension of competition that occurs between building contractors which means that over time the cost of new requirements (such as sprinklers) will come down.

10.20 An additional issue to consider is that whilst agents and others professionally engaged in housing developments and applications could be considered to have a detailed understanding of what is required, their clients or individuals acting in their own right are less likely to have such knowledge. There is therefore an obligation on the National Park Authority when dealing with such applications to ensure clarity and sufficiency of information. The County Council officials see a lot of the issues raised as being caught up in what it describes as cultural perception which creates barriers to effective delivery of our policy objectives, and suggest that whilst some of this could change it needs concentrated effort and determination to do so.

10.21 We acknowledge, from those who commented to the Committee, that there appears to be a general perception that our policy is rigid. Whilst our officers may believe and seek to demonstrate that this is not the case in many senses perception is reality and therefore the onus is upon the Authority and its officers to take some action to avoid the misunderstandings.

10.22 In a positive response to this point officers advise that there are areas that could be explored to streamline the process and making contact with landowners. The Authority also needs to be aware of the current commission by the Welsh Government into the ‘Evaluation of the planning permission process for housing’. It is due to publish its findings around September 2013.[[20]](#footnote-20)

10.23 There is also (possibly linked) an ‘Inquiry into barriers to home building in Wales’. The National Assembly for Wales’ Communities, Equality and Local Government Committee is to undertake a short inquiry into barriers to home building in Wales.

10.24 We were told that our planning procedures militate against the flexible approach that our policies allow for.

10.25 Whilst agents and others professionally engaged in housing developments and applications could be considered to have a detailed understanding of what is required, their clients or individuals acting in their own right are less likely to have such knowledge and there is therefore an obligation on the National Park Authority and the officers dealing with such applications to ensure clarity and sufficiency of information.

10.26 In addition we have heard from officers that opportunities to explore options or initiate negotiations to agree affordable housing contributions are not taken once an application has been submitted because to do so could open up an area of negotiation which could be considered to be unfair to other applications where affordable housing was not an issue and more importantly (in the eyes of our officers) prejudice achieving the time targets within which applications are expected to be dealt with.

10.27 This is an issue that could be usefully debated by the Authority as to whether it is more important to meet completed process targets or where there is a real possibility of negotiating an agreed route to delivering affordable housing.

10.28 **Recommendations:**

* **Officers should routinely report on the ways in which they have encouraged/initiated discussion and negotiation on agreeing affordable housing proportions or contributions.**
* **The National Park Authority should debate the issue of maintaining targets for dealing with applications within a given time period against it being acceptable to miss such targets if in doing so it is likely that an agreed way of delivering affordable housing as part of a development application can be achieved.**
* **That a Communications Plan is drafted:**
* **to explain to, and educate, third parties on the Authority’s stance in respect of our policies on, and approach to, affordable housing in order to counter some of the misunderstood views held about us;**
* **to engage with landowners, developers and contractors to help and explain what is required, as the perception and lack of understanding is seen as a barrier to some to even consider participation, and**
* **to actively encourage developers and landowners to bring forward sites for development, which include affordable housing.**

**11. Our Officers**

11.1 The participants all viewed our officers positively, and have had no problems with their support or advice. Indeed Pembrokeshire County Council’s Housing Department sees that the National Park Authority and its officers can be seen to offer value in being considered an “honest broker” in facilitating development.

11.2 There was a view from the Housing Associations that they consider that officers are often frustrated by the lack of success in delivering affordable housing. They also commented that they considered that officers are embedded within a culture that finds it difficult to understand or support the motivation of the private sector.

11.3 They also considered that our officers may be lacking some of the skills necessary to make the best use of the viability assessment procedures used and that also puts them at a disadvantage in negotiating with the private sector. Our officers point out that these are subjective comments as no evidence or examples of where this was considered to have occurred were provided to the Committee.

11.4 We discussed this with officers and, while there may have been a lack of resource at some stages, recent appointments and the active links that officers have with developers and other agencies reassured us that there is no lack of skills or understanding that is preventing developments from being pursued.

**12. Social Housing Grant**

12.1 We were advised by Lyn Hambidge, Pembrokeshire County Council’s Head of Housing Commissioning, that the Social Housing Grant programme is much reduced from what it provided a year or so ago and the finance available is unlikely to improve.[[21]](#footnote-21)

12.2 The Rural Housing Enabler and both Housing Associations advised that on top of this reduced provision the grant programme isn’t working in the National Park because of the higher land values which are above the Welsh Government Acceptable Cost Guidelines (ACG).

12.3 This was confirmed by the Welsh Local Government Association who pointed out that while the Welsh Government’s Acceptable Cost Guidance figures are provided as guidance on the likely acceptability of scheme costs for Welsh Government social housing grant (SHG) purposes government expects that the majority are capable of being produced at or below ACG. In any case cost over 120% will not be met by Welsh Government’s SHG for general needs schemes.

12.4 It was of note that of the two affordable housing schemes considered and approved by Welsh Government in the Pembrokeshire National Park area over the past three years, both were above the ACG level.

12.5 In addition it is considered by Housing Associations to be more expensive to build in the National Park because of the Authority’s design requirements. Acceptable Cost Guidelines have been insufficient to cover these costs and delays incurred with projects while a case is made to the Welsh Government for additional funds.

12.6 Officers of the Authority gave evidence of negotiations where less costly solutions, but solutions that are equally acceptable in design terms, had taken place with Housing Associations. Practical examples of this could be included in a revised Supplementary Planning Guidance. Additionally commuted sums received could assist with bringing sites forward.

12.7 The building programme of Registered Social Landlords (Housing Associations) has a significant impact on the delivery of affordable housing in Pembrokeshire. Lyn Hambidge, Head of Housing Commissioning, provided a profile of affordable housing completions using social housing grant support from 2009 to 2012. (Attached at Appendix 6 is a profile reflecting the position in Wales generally.)

|  |  |  |  |
| --- | --- | --- | --- |
|  | 2009/10 | 2010/11 | 2011/12 |
| PCNPA | 11 | 3 | 0 |
| PCC | 111 | 103 | 18 |

12.8 We were also told (e.g. by the South Meadow Homes representative and others) that the process requires front loading development costs with compliance and other costs which is a disincentive to looking to develop in the National Park area.

12.9 We asked whether it matters if affordable housing is not developed in the National Park area if it can be developed elsewhere in Pembrokeshire. The response of Pembrokeshire County Council as housing authority was that it does matter because we have a duty to support all, not just some communities. This view is supported by the Authority’s Local Development Plan policies.

12.10 With the recent ministerial changes in Welsh Government where planning has been put together with housing and regeneration as part of the same portfolio and initial indications from the Minister that he intends to place homes at the centre of all functions in his department, including affordable housing, there is an opportunity to engage and lobby on a number of the issues identified by our work.

12.11 Since the completion of the evidence-gathering sessions, Welsh Government has published a consultation document “Taking the Long View – the draft policy statement for Protected Landscapes in Wales”[[22]](#footnote-22), which suggests that “Adherence to conservative *sic* (presumably ‘conservation’) principles may not always be desirable”. The document also says that this has relevance to the priority for increasing affordable housing and that National Parks and Areas of Outstanding Natural Beauty “can be the mechanism for collaboration and networking” to “innovate and work through solutions”.

12.12 **Recommendation:**

**That a paper is drawn up incorporating the relevant findings in this report in order to form the basis of an engagement with Welsh Government to seek support and, where necessary, changes in policy to enhance and improve the delivery of affordable housing in the National Parks and other rural areas.**

**13. Land availability**

13.1 We were told by Pembrokeshire County Council officials that landowners are intentionally not bringing land forward because the high % affordable housing allocation puts them off. We need to find a way of encouraging landowners to come and talk to our officers about our policy and how it is applied.

13.2 It was also noted that the County Council is a significant owner of land within the National Park area, but was not currently bringing such land forward for development. Council officials gave evidence to the effect that, while they are motivated to look to the provision of affordable housing they are also duty bound to obtain the best capital receipt which means that land “could not simply be given away” and our policy of seeking to achieve a 50% provision means that these two aims cannot be achieved – so developments do not take place. Officers countered this argument, explaining that, while the Council – as landowners – had to consider the policies and regulations of the day and, therefore, had to seek the best value in terms of the public purse, if it wished to take advantage of its role as housing authority, other issues could be factored into the equation when disposing of land.

13.3 It was said to us that landowners may have unrealistic expectations in that the “hope value” that landowners had was higher than can be realised by developers within the existing policy system the fact is that whilst theoretically land allocated in the plan together with “windfall” applications for residential development is sufficient to meet identified demand the fact of landowner holdback results in the current supply of land being severely limited.

13.4 We were told that there is a latent supply that could be released if this was not the case and the suggestion was made that we could look at reducing our 50% allocation to encourage more land to be made available for housing development which would increase the number of affordable housing units – albeit on a smaller proportionate basis than the current policy provides.

13.5 It is the case that circumstances in relation to a development lead to lower proportions via viability assessment and this can be justified – provided that applicants are aware of the possibility, officers genuinely seek to engage and negotiate and that our processes support rather than militate against such a possibility.

13.6 Pembrokeshire County Council officials told us that there were currently no applications being considered on Council owned sites in the National Park area because of current economic conditions and the fact of the high proportion of affordable housing on the allocations required by our policy. As a consequence developers were simply not interested in developing. Others reinforced this view and suggested very strongly that a reduction in the policy % would act as a stimulus to interest in developing in the PCNPA. The Housing Associations pointed out that 20% of something was better than 50% of nothing.

13.7 It was also suggested that a reduction from the basic 50% target could even be introduced as a temporary or geographically targeted measure. In the view of many witnesses the end result of any such changes would be more affordable housing units than the system is delivering under the current policy.

13.8 The issue of whether there is sufficient land available for development was raised during the sessions and a detailed analysis of how land availability is calculated can be found at Appendix 7.

13.9 We need to be always on the alert for new opportunities for housing development which may not have been available at the time the Local Development Plan was prepared. Officers advise that the specifics as to how this is happening in this National Park can be found in Appendix 7.

13.10 Officers also refer to Ms Lin Cousins’ review of the marketability of the Authority’s allocations, as this could be a factor in their take up. Her conclusion was that she believed that all the sites could and would come forward in the future, but there were some things the Authority could do to unlock some of the problems. (These suggestions, together with others raised during the review process are attached at Appendix 8. Officers’ advice on whether there is evidence currently in place to action the suggestions is also detailed in that Appendix.)

13.11 **Recommendation:**

**It is proposed that the Authority explores opportunities to work in partnership with Pembrokeshire County Council to release some of their land for development purposes.**

**14. Developers**

14.1 We were told by many of the participants, but especially by the Housing Associations, that Pembrokeshire is less attractive to developers of affordable housing because:

* there is little land available;
* landowners are less sophisticated than elsewhere and have unrealistic expectations of value;
* our peripherality means that the area lacks the lower costs that are available to developers to the east where supply chains are more efficient and less stretched;
* the economies of scale with larger developments are not available as most potential opportunities are for a few units only.

14.2 It was noted, however, that a number of these issues, together with other influences on development, not only applied to National Parks but throughout Wales as well.

14.3 The Home Builders Federation and others added to this by pointing out that Welsh Government’s requirements on energy efficiency has added to the cost of housing, and that current consideration on enhancing these requirements in 2015 will exacerbate this. In addition, the Welsh Government intention to require fire sprinklers in all new homes will add a further £7,000 (according to the Home Builders Federation) to the build cost of each new home. This level of cost was questioned by others but all agree that a significant increase in costs will be added which will impact on the delivery of affordable housing across all areas in Wales. Since providing this advice a Statement has been issued by Carl Sargeant (see paragraph 10.17 above for reference).

14.4 Given that Pembrokeshire is at the end of a tenuous affordability supply chain there is a view expressed to us by developers that affordable housing provision in the Park will be affected even more severely than in other parts of Wales where such cost increases can be better managed.

14.5 Issue: in the National Park land costs are higher than the surrounding areas:

* and the costs of any development are higher than outside the Park area because of design requirements.
* our officers are frustrated about the lack of delivery of affordable housing through the application of our policies.
* Volume house builders are not available in Pembrokeshire unlike elsewhere.
* There are many planning hoops to get through that deter potential developers.
* Acceptable Cost Guideline targets often cannot be met and therefore the reality has to be justified to Welsh Government.
* Design requirements are a problem. We are seen as “trying to create a vernacular” with the consequence that “pretty costs money”.
* In the view of the Housing Associations we need to concentrate on delivering through the planning process and not get too hung up on grants and to this end the 50%+ level and the hoops in the process need to be addressed.

14.6 Officers advise that, as an example, research done at the time the affordable housing contribution was implemented, showed that the contribution would come from plots which were on the market for prices ranging from around £100,000 to £225,000. The impact will be on the landowner selling the plot. It will be the same impact on larger development proposals where there is an affordable housing requirement. In essence this provides more of an opportunity to seek affordable housing in the National Park. In terms of property prices, from which plot prices are derived, within and outside the National Park there is a clear difference. Median prices for house sales of all types in the year to June 30th 2010 were £195,000 in the National Park and £154,500 in Pembrokeshire outside the Park area.

14.7 The Committee notes that the Welsh Government proposes changes to house building requirements which were in line with the Authority’s comments on the recent consultation (see paragraph 10.17).

**15. Perception and advice**

15.1 Pembrokeshire County Council officials see a lot of the issues raised as being caught up in what they describe as cultural perception which creates barriers to effective delivery of our policy objectives, and suggest that while some of this could change it needs concentrated effort and determination to do so.

15.2 We acknowledge the general perception that our policy is rigid is misplaced. However, in many senses perception is reality and therefore the onus is upon the Authority and its officers to take some action to avoid the misunderstandings.

15.3 **Recommendation:**

**That a Communication Plan is drafted as referred to in Section 6 above.**

**16. Information on and explaining our policies**

16.1 While the fact that as a Scrutiny Committee we were looking at affordable housing was public knowledge, we did not seek views from the wider public. We accepted that many, if not most, enquiries and engagements would be with professionals or those well versed in developments who would know who to approach and what questions to ask that were relevant to their situation. However, we were made aware of an issue where a potential applicant could not find the necessary information that was required to help submit her planning application on the Authority’s website.

16.2 The Authority needs to both check that publicly available information in published form and on the website is as non-technical as possible so that it is easily understood by a lay person, and that officers provide sufficient time and understanding to enquiries from individuals unversed in the workings of our policies.

**17. Reduce the impact of perceived barriers – design standards**

17.1 It was suggested that we could look at trialling some reduction of those areas that we were told deter the development of affordable housing. This would enable us to test whether by doing so new development could be stimulated and therefore lessons learned as to what are the critical factors in play in encouraging the development of affordable housing. Such knowledge could then be built into future policy development.

17.2 In particular the detail of our design guidelines was suggested as being too restrictive (and therefore expensive) to encourage incorporation into affordable housing developments which therefore prejudices developers against considering such schemes. It is worthy of note in this context that the current Welsh Government consultation document “Taking the Long View – the draft policy statement for Protected Landscapes in Wales” says that National Parks should review their design guidelines to support a transition to low carbon buildings.

17.3 Representations were made to us that lower (and, therefore, cheaper) design standards should be imposed for affordable housing units. However, we did not agree with the suggestion as there is no excuse for poor design. As one Member stated: “The better the home, the better the quality of life – lowering standards is not the answer”.

17.4 Officers of the Authority gave evidence of negotiations where less costly solutions, but solutions that are equally acceptable in design terms, had taken place with Housing Associations. This would be equally applicable to non-Housing Association developments.

17.5 **Recommendation:**

**Practical examples of good design should be included in a revised Supplementary Planning Guidance.**

**18. Viability Assessments and the use of the Three Dragons Development Appraisal Toolkit**

18.1 Affordable housing requirements will add cost to a housing development. The requirements will also lower the value of land. If this brings it below a viable level then the development will not take place (and of course it may not take place for a whole raft of other reasons as well).

18.2 To test this, the Three Dragons Development Appraisal Toolkit is used by the National Park Authority which is designed to allow a reasonable amount to be paid to a landowner for the land and for developers and contractors to make a profit.

18.3 Originally used by the London boroughs it has been purchased by several planning authorities in Wales. The use of the toolkit has been endorsed by Welsh Government[[23]](#footnote-23) and as ‘a well-established methodology’ in the Inspector’s Report into the Pembrokeshire Coast National Park Local Development Plan.[[24]](#footnote-24)

18.4 The Housing Associations indicated both a lack of understanding and also some criticism of our adoption and use of the Three Dragons Development Appraisal Toolkit. They suggested that we do not have the in-house expertise to either properly manage it nor to protect ourselves from being “stitched up” by developers. While this was a view stated to us there was no hard evidence to support this claim.

18.5 It was suggested that if the basis on which the Three Dragons Development Appraisal Toolkit was set up to calculate viability has changed, which it has, then it requires a re-assessment itself. In particular they consider that the level of profit allowed for is probably not enough.

18.6 They also commented that they see that there is a culture within the public sector (not just the National Park Authority) that profit “is a dirty word” and that after the exploitative success of some developers it is now “payback time”. This culture is neither accurate nor helpful in achieving the objectives of improving the stock of affordable housing. They pointed out that profit is a return for the level of risk taken and given that, in their view, the public sector is risk averse there needs to be both an understanding and acceptance of this and specific and real support. We note the comments made, but do not agree with the views expressed.

18.7 Officers advised Members that the system also allows a degree of negotiation and pointed to a number of instances where such negotiation had taken place and achieved an agreed result for a development – e.g. the Royal Gatehouse, Tenby and the Cambrian Hotel, Saundersfoot developments. Please also see Section 10 regarding negotiation. We were also advised by officers that the Three Dragons methodology includes a default profit for the developer of 17%. This evidence of negotiation provides good information for a campaign to try and alter perceptions.

18.8 The perception that the 50% affordable housing policy requirement is a barrier to negotiation is dealt with under Section 10 above.

18.9 Other witnesses told us that the cost of developing in the National Park is more expensive, and rural Pembrokeshire is also more expensive than the urban south east of Wales. In their view insufficient allowance is given to this inbuilt disadvantage. See Section 14 above for commentary on this issue.

18.10 Whatever the % target used we believe that viability is the key to progress and that the recognised validation assessment process which we, and others, use (i.e. the Three Dragons Development Appraisal Toolkit) should be supported – it provides a level playing field for landowners and developers and the other interests and the public can be reassured that it is fair and open. Developers should be able to be assured that we will engage positively with them and provide help with the viability assessment process for those who find it off-putting.

18.11 **Recommendations:**

**That a Communications Plan is drafted, as referred to in Section 6.**

**19. Financing developments and take up of affordable housing**

19.1 From the finance sector there is significantly less appetite to lend on affordable housing because of perceived less security. Certainly blanket lending to a development from one provider is unlikely to happen because of the risk of market failure which could reduce the security provided and a single funder would be too exposed. Therefore a range of lenders is required – and, although the Committee was advised that some lenders take a more sympathetic view than others in mortgaging affordable housing, they are few.

19.2 Both Pembrokeshire County Council officials and the Principality Building Society representative indicated that mortgage lenders will only lend against market value rather than against assessed affordable housing values.

19.3 The affordable housing sector is not viewed with much favour by the finance sector and comes very low down on priorities for lending. Could this be an area where government backing to reduce risk could come in to play?

19.4 The finance sector sees that developers “rail against” the 50%+ requirement seeing it as being very restrictive.

19.5 Peter Hughes of the Principality sees that more understanding and use of the Section 106 agreements would be of significant advantage and with his wider, all-Wales hat on, offered to broker an additional meeting or series of meetings involving Welsh Government, Welsh Local Government Association and our own officers etc. to explore and develop this further.

19.6 Officers advise that S106 agreements are used regularly and the Authority provides template agreements to applicants. Officers of the Authority also advise that they have been party to, and inputted into, the revised Welsh Local Government Guidance ‘Securing Mortgage Access for Affordable Housing: A good practice note for planning and housing practitioners’ February 2013.[[25]](#footnote-25)

19.7 **Recommendation:**

**That the Authority actively engages with the Finance sector either direct, through government or linked agencies (e.g. Finance Wales) to work towards a better understanding of the need for financing of affordable housing and an agreed means of providing for it.**

**20. The Right to Buy**

20.1 Even if the right to buy legislation can be seen as a cause of affordable housing shortage and some of the current problems it does not follow that suspending this right in certain areas, for which powers are now available, would help correct the position as there are now very few applications or indeed expressions of interest coming forward.

20.2 However the National Park Authority is a statutory consultee to Pembrokeshire County Council enacting the legislation to suspend the right to buy (for 5 – 10 years) and will have the opportunity to respond should the Council seek to make some changes.

**21. Review of the scrutiny process itself**

21.1 This was the first full blown attempt by the Pembrokeshire Coast National Park Authority to implement our newly agreed scrutiny process following a successful trial partnership with the Brecon Beacons National Park Authority. As such there are some observations and recommendations that the Committee can make to assist the Authority in evaluating its commitment to, and management of, scrutiny programmes so as to improve the process and provide greater value from the outcomes.

21.2 A report will be presented to the National Park Authority in due course as part of the Authority’s review of the scrutiny process.

**APPENDIX 1**

**Welsh Government guidance on the Local Development Plan review process**

**Can Members alter a policy of the Local Development Plan (LDP) with a National Park Authority resolution?**

*No - neither the LDP nor any policy in it can be altered simply by resolution of the National Park Authority; alterations can only occur by following the formal LDP revision process. Outside of the required 4-yearly review, it is the Annual Monitoring Report that would generally provide the triggers for plan review and subsequent alteration proposals. Planning applications must be determined in accordance with the adopted LDP unless material considerations indicate otherwise (Planning and Compulsory Purchase Act 2004 Section 38(6)).*

**If the National Park Authority, on the 23rd October 2013, resolves to review targets, what will be the process for that review?**

*Any review of the Affordable Housing policy targets must be evidence based with full consideration of implications for the LDP strategy and other policies of the Plan and the Sustainability Appraisal/Strategic Environmental Appraisal. The process for review is currently the same as for preparation of the current LDP (2004 LDP Regulations).*

**If the National Park Authority, on the 23rd October 2013, resolves to review policy what will be the process?**

*As above. A new Delivery Agreement will be required relating specifically to the review (this would enable the National Park Authority to review the current Delivery Agreement and build on lessons learnt, so would not necessarily have an identical Community Involvement Scheme).*

**Will the Regulations require amendment for a partial review of the Plan?**

*No – Partial revision of the LDP can be accommodated under the current Regulations; the process for Plan revision is the same as for Plan preparation. However, Welsh Government is currently considering amending Regulations to enable a swifter revision process where there are no implications for the existing strategy (see below).*

**What is the timetable for refinement of the Regulations?**

*Amendments to LDP Regulations and published national guidance is targeted for late Summer 2014, following consultation with stakeholders (including Local Planning Authorities) in Spring 2014. Welsh Government has published a Report on its web-site outlining how it intends to improve the current LDP preparation process, including the process for plan revision (The LDP Process Refinement Exercise Report, September 2013).*

**APPENDIX 2**

**LDP affordable housing targets – comparison between Pembrokeshire Coast National Park Authority and Pembrokeshire County Council**

A comparison with the targets contained in Pembrokeshire County Council’s Local Development Plan adopted February 2013 shows the greater challenge the Authority has set itself to address the backlog of affordable housing need more quickly.

There are an estimated 42,323 households in Pembrokeshire outside the National Park. There are an estimated 10,277 households in the National Park.[[26]](#footnote-26)

The affordable housing planned provision is 1 additional affordable house for every 43 existing households in the remainder of Pembrokeshire (42,323/980[[27]](#footnote-27)). For the National Park area it is 1 additional affordable house for every 19 existing households in the National Park (10,277/530). Does this reflect a relatively higher level of affordable housing need in the National Park? This does not appear to be the case.

The Authority’s Housing Background Paper for the Local Development Plan identified the backlog of need both inside and outside the National Park.[[28]](#footnote-28) For every 24 existing households in the National Park there was a backlog need of 1 affordable house (10,277/432). There was a need for 1 affordable house for every 20 existing households in the remainder of Pembrokeshire (42,323/2094). Essentially this Authority has sought to address the full backlog of housing need plus arising need (a target of 530 affordable houses versus a backlog of 432 households in need) whereas the County Council has sought to address just under 50% of its backlog of need (a target of 980 affordable houses versus a backlog of 2094).

Given that the Pembrokeshire Coast National Park Local Development Plan is for a 14 year period a 10 year affordable housing provision figure would compare as follows.

The affordable housing planned provision is 1 additional affordable house for every 43 existing households in the remainder of Pembrokeshire (42,323/980[[29]](#footnote-29)). For the National Park it is 1 additional affordable house for every 27 existing households in the National Park (10,277/378[[30]](#footnote-30)).

**APPENDIX 3**

**Case Summary from ‘Recent Developments in Planning Case Law’**

JOHN PUGH‐SMITH of 39 Essex Street

The following is an extract from a paper available on the web which is aimed at providing a coherent and reasonably comprehensive review of case law over the last twelve months for the planning practitioner.

This case was a challenge to quash a development plan policy relating to affordable housing.

*“Recently, in Barratt Developments plc v Wakefield MDC & Secretary of State for Communities and Local Government 17 an unsuccessful attempt was made to quash Policy CS6 ‘Housing Mix, Affordability and Quality’ of Wakefield’s adopted Core Strategy with Barratt arguing that the 30 per cent district‐wide affordable housing requirement imposed an unrealistic target and that it did not pay due regard to PPS3 and PPS12 the Yorkshire and Humberside Plan (the RSS to 2026).*

*Whilst Mr Justice Pitchford acknowledged that the policy was “not happily drawn and had the capacity to confuse”, properly construed, however, it was not undeliverable and inflexible. The policy did pay due regard to national policy and to the relevant RSS, and, set a justifiable target for sites above a workable threshold limit, recognising that the target was achievable only in certain economic conditions. Application of the policy that affordable housing should be provided where possible meant that provision had to depend on the exigencies both of the site and of market conditions at the time the application for permission was made.*

*The policy provided the flexibility required by making the target subject to negotiation. The alternative, namely to provide stepped percentages based on variable economic conditions, was unworkable and doomed to failure because of the difficulties of accurate prediction and definition.*

*Having regard to the need for affordable housing, this had been the best that the inspector could do in unusual and unstable economic times. It was an undeniable consequence that, while national policy wished to provide both improved targets to deliver affordable housing and developers with the requisite degree of certainty for the purposes of planning development, current economic conditions had, at least for the time being, undermined policy. However, it could not be said that the solution adopted in this case was irrational.”*

**APPENDIX 4**

**Percentage requirement for affordable housing – comparison with other planning authorities**

A review of Welsh Planning authorities[[31]](#footnote-31) overall ‘against’ National Park authorities shows that generally the percentage requirements are predominantly below 50%. References from between 50% and up to 100% are limited but there are a number of planning authorities Plans using 100%.

Specific reference was made to the policies of Pembrokeshire, Brecon Beacons National Park Authority and Ceredigion County Council during the sessions. For ease of reference the requirements are:

**Pembrokeshire**[[32]](#footnote-32): Individual indicative targets are set out for for allocated sites. In Towns (e.g Haverfordwest, Pembroke), Service Centres (e.g Crymych, Kilgetty) and Service Villages (e.g. Crundale, Carew, Sageston) 10% of dwellings are proposed to be affordable. In Large Local Villages (16 in total, e.g. Burton, Stepaside) 50% are proposed will be affordable (concerns over the viability of development do not justify any relaxation of the policy). In Small Local Villages (58 in total, e.g. Pelcomb Cross, Pleasant Valley) all new dwellings (100%) will be affordable (concerns over the viability of development do not justify any relaxation of the policy). Implementation of these policies are at an early stage.

**Ceredigion**[[33]](#footnote-33): Seeking to negotiate a proportion of 20% affordable housing on all housing development. Permitting 100% affordable housing sites where justified by evidence of unmet affordable local need provided the location of the development is in line with Policies S02, S03 and S04.

A comparison with UK National Parks[[34]](#footnote-34) shows that out of the other 14 National Park Authorities 6 refer to a 50% requirement, and 8 refer to a 100% requirement. There are a small number of references below 50% and between 50% and 100%. In conclusion, the Authority’s policy approach is more in keeping with other National Park Authorities than Welsh planning authorities generally. Snowdonia National Park Local Development Plan takes a similar approach to this National Park. We have no evidence however as to how effective these policies are in delivering affordable housing in the other National Parks, whereas we do have the evidence of the poor take up in our Park area.

**Brecon Beacons**: Brecon Beacons National Park Unitary Development Plan (Adopted March 2007).

The Authority will seek 20% of units of sites of 3 or more as affordable housing. On sites of 3 to 4 units the payment of commuted sums may be negotiated. In rural areas the exceptional release of land will be considered for affordable housing provision.

Brecon Beacons Local Development Plan (Deposit Version September 2010)[[35]](#footnote-35)

All housing developments are to make a contribution to affordable housing provision:

* Abergavenny, Hay and Crickhowell 30%
* Brecon, Carmarthenshire rural 20%
* Heads of the Valleys and rural south 10%
* In Limited Growth Settlements and Countryside 100%
* Commuted sums can be provided in lieu of units
* In rural areas the exceptional release of land will be considered for affordable housing provision.

Brecon Beacon’s Local Development Plan policies have not been finalised yet.

**Snowdonia**: Snowdonia National Park Authority Local Development Plan[[36]](#footnote-36) which was more recently adopted (13th of July, 2011) requires 50% affordable housing contribution on:

• Privately owned sites within main settlements;

• All sites in Bala and Dolgellau;

• Secondary settlements;

• Conversions.

The Plan requires 100% affordable housing on:

• Publicly-owned land within settlements;

• Sites in service settlements;

• Smallest settlements.

Officers also advised us that because the policy allows negotiation and they actively seek to encourage that where difficulties emerge the reality in the Pembrokeshire Coast National Park is that the average affordable housing provision on developments that have been approved is around 35%.

A case could be made that if the 50%+ target is seen as a barrier to even consider engaging with officers on a possible development (and we were told that to engage and make a case that can be discussed and negotiated on costs a considerable amount of money and time) then greater success would be achieved in accepting the reality that we are not achieving the 50% benchmark and pragmatically we never will. Therefore, a suggestion made to us was that the 50% should be reduced.

Officers advise that there are several issues that need addressing when deciding on an affordable housing requirement and using a simple comparison of headline figures with other planning authorities would not in itself be the basis for deciding that policy requires changing.

In deciding on the level of housing provision and in particular affordable housing provision in this Authority’s Local Development Plan evidence[[37]](#footnote-37) was required on:

* Population projections;
* Levels of affordable housing need within local communities versus land availability;
* House Prices and the impact of changes to house prices;
* Landscape capacity for development;
* Achieving a sustainable settlement strategy;
* The availability of previously developed land;
* Locating development in sustainable locations;
* Physical, environmental and servicing constraints;
* What mix of overall affordable housing policy requirements, site thresholds (i.e. the impact of using different thresholds), site specific targets etc. can be achieved (viability testing required).

These factors will differ for each planning authority, but landscape capacity issues tend to be common in National Park locations. Any review of affordable housing policy and its target could potentially necessitate a review of any of the above matters. By way of example, one consequence of proposing to lower targets might be an expectation that additional land is allocated. Without guidance in place from the Welsh Government on what a partial review of the Plan would constitute it is difficult to comment further. Please also see commentary under Section 6.

**APPENDIX 5**

**Portfolio of potential affordable housing development sites available in Pembrokeshire (as at November 2012)**

|  |  |  |
| --- | --- | --- |
| Site | Hectares | Number of units |
| 1. Bryn Hir, Tenby | 6.35 | 168 |
| 2. Cottage Hospital Site Tenby (sold) | 0.17 | 10 |
| 3. West of Narberth Road, Tenby (under offer) | 1.14 | 25 |
| 4. Crymych Depot site (under offer) | 0.37 | 15 |
| 6. Bro Dawel, Solva | 1.65 | 18 |
| 7. Butts Field Tenby | 0.94 | 80 |
| Totals for Pembrokeshire County Council | 10.62 | 316 |
| Total Allocated sites in Pembrokeshire Coast National Park Local Development Plan | 27.4 | 726 |
| Percentage owned by Pembrokeshire County Council at time of Local Development Plan adoption | 39% | 44% |

The General Disposal Consent (Wales) 2003, which came into effect on the 31st December 2003 and applies to the disposal of local authority owned land allows for the disposal of land in any manner they wish provided that the disposal is not an undervalue. A disposal will be at an undervalue where the proposed consideration is less than the best that can be reasonably obtained.

What can reasonably be obtained will be influenced by the current affordable housing policies. The Examination into the Pembrokeshire Coast National Park Local Development Plan and the subsequent Inspector’s Report considered issues of viability raised by the County Council and the adopted Local Development Plan reflects those considerations.[[38]](#footnote-38)

The latest viability testing done on land owned by Pembrokeshire County Council was for the Joint Housing Land Availability Study for the Pembrokeshire Coast National Park Authority.[[39]](#footnote-39) The Inspector’s report refers to the methods this Authority employs to identify residual land values, i.e. what the landowner should reasonable expect to receive for land once requirements such as affordable housing have been provided for.

Paragraph 15, of the Inspector’s report advises:

*"Turning to the issue of residual land values and the incentive for sale, time was spent at the hearing exploring the respective positions of the National Park Authority and the Home Builders Federation (HBF). In summary, the Authority considers that a tenfold uplift in existing (agricultural) use land value is sufficient to bring a site forward. It states that this equates to approximately £10k per plot, which based on a development density of 30 dwellings per hectare gives an indicative threshold land value of £300k per hectare. The written submission from HBF did not identify an equivalent figure. Whilst at the hearing HBF indicated verbally that it considers that a more realistic figure based on landowner expectations is £16.5k per plot (£486k per hectare), I consider that this higher figure is to some extent aspirational. However, bearing in mind this disparity I indicated my intention to use these two opposing figures as representing the respective positions of the parties concerning the viability threshold of disputed sites, particularly in relation to the question of affordable housing provision. Both parties indicated that they were content with this approach.”*

The conclusions of the Inspector on disputed sites owned by Pembrokeshire County Council were:

* *HA750 Depot Site Crymych (15 units) – Agreed that there are significant viability issues with the site and it should not be included in the 5 year supply. The site now (July 2013) has planning permission for 18 affordable dwellings.*
* *HA723 Former Cottage Hospital site, Tenby (10 units) – In the light of the National Park Authority’s preparedness to decrease affordable housing requirements and Pembrokeshire County Council’s intention to market the site, agreed that the site should be included in the 5 year supply.*
* *HA727 West of Narberth Road, Tenby (25 units) – Agreed that viability assessment produces an adequate residual value and that 10 units should be included in the 5 year supply.*
* *HA384 Adjacent Bro Dawel, Solva (18 units) – Although it appears that discussions are continuing with Pembrokeshire County Council over the details of a scheme to be brought forward on this site, there are significant issues concerning sewerage infrastructure provision at Solva. Funding to upgrade the existing WWTW will not be in a Dŵr Cymru/Welsh Water Asset Management Programme until 2015 at earliest, and no information is available concerning the prospect or priority of such a scheme. Given this evident significant infrastructure constraint I consider that the site should not be included in the 5 year supply as at 1 April 2011.*
* *The NPA believes that site HA377 Brynhir, Tenby (168 units total – 30 within 5 years) should be included as an agreed site in the 5 year supply. However, the categorisation of the site as such is clearly disputed. Given the significant highways and sewerage infrastructure issues, in particular concerning sewerage capacity constraints at Tenby WWTW and the lack of evidence as to how this constraint will be overcome so as to deliver housing within the five year period, I consider that the site should not be included in the 5 year supply as at 1 April 2011.*

In summary, where issues of viability were recognised on individual sites the clear message to the Inspector and the Pembrokeshire County Council from the National Park Authority was that there was a willingness to negotiate.

**APPENDIX 6**

**Affordable housing provision in Wales 2011/12**

Table 3 from the First Release Affordable Housing Provision in Wales 2011 – 2012 identifies total affordable housing provision over this period (i.e. including the private sector).

|  |  |  |  |
| --- | --- | --- | --- |
|  | 2009/10 | 2010/11 | 2011/12 |
| Pembrokeshire Coast National Park Authority | 12 | 3 | 0 |
| Pembrokeshire County Council | 111 | 102 | 26 |

The table reflects the position in Wales more generally, i.e. Registered Social Landlords deliver the largest proportion of affordable housing provision and if such developments are not coming forward this severely impacts on affordable housing provision overall. [[40]](#footnote-40) Lyn Hambidge, Head of Housing Commissioning at Pembrokeshire County Council also advised that most of the affordable schemes throughout the County were on land owned by the local authority as this helped to keep land values low.[[41]](#footnote-41) Please also see discussion under Section 13 regarding land in the County Council’s ownership that is allocated in this National Park Authority’s Local Development Plan.

**APPENDIX 7**

**Land availability in Pembrokeshire**

The overall land supply for the life of the Pembrokeshire Coast National Park Local Development Plan 2007 to 2021 (14 years) is an estimated 1,600. As advised under Section 8, this is to enable the delivery of affordable housing rather than to respond to any population growth projection.

As an immediate comparator, Pembrokeshire County Council’s Local Development Plan identifies a provision of 7,300 dwellings in the Plan to enable delivery of 5,700 dwellings over a 10 year period 2011 to 2021.[[42]](#footnote-42) Pembrokeshire County Council’s population projections show an increase in population of an estimated 4,900 households for the period 2010 to 2011.[[43]](#footnote-43)

There are an estimated 42,323 households in Pembrokeshire outside the National Park area. There are an estimated 10,277 households in the National Park area.[[44]](#footnote-44) The housing provision is 1 additional house for every 6 existing households in the remainder of Pembrokeshire (42,323/7,300[[45]](#footnote-45)). For the National Park it is 1 additional new house for every 6 existing households in the National Park (10,277/1600).

Given that the Pembrokeshire Coast National Park Local Development Plan is for a 14 year period, a 10 year provision figure would compare as follows. The housing provision is 1 additional house for every 6 existing households in the remainder of Pembrokeshire (42,323/7,300[[46]](#footnote-46)). For the National Park it is 1 additional new house for every 9 existing households in the National Park (10,277/1143[[47]](#footnote-47)).

Local planning authorities are also required to demonstrate a five year effectively available housing land supply.[[48]](#footnote-48)

The Pembrokeshire Coast National Park Authority’s Housing Land Availability Study of 2011[[49]](#footnote-49) identified that the Authority’s housing land supply of 3.8 years falls short of the 5 year requirement which places an obligation on the Authority to take steps to increase the supply of housing land. The Authority has set out a number of steps to be taken to address this shortfall as set out in the Authority’s Local Development Plan Annual Monitoring report 2012.

Paragraph 5.1 of Technical Advice Note 1 (Joint Housing Land Availability Studies) details what planning authorities should do where the study shows a land supply below the 5 year requirement, including the need to give considerable weight to increase supply when dealing with planning applications for housing developments. This was supplemented by advice from Jane Davidson AM in 2007 that Authorities will continue to approve new housing developments, provided that all other relevant policy considerations are met. Other suggested actions are reviewing the Development Plan, releasing land in the Authority’s ownership and securing the provision of infrastructure for particular sites which prospective developers may be prepared to finance in whole or in part. In order to address this shortfall the National Park Authority is continuing with the following actions:

(A) Approving planning applications for housing developments, provided all relevant policy considerations are met. This is shown through the 5 year land supply figures. Of the total dwellings included in the 5 year land supply, 38% are on sites allocated in the Local Development Plan. The remaining 62% of dwellings are on land with planning permission, including 15% on sites of less than 5 units. This clearly demonstrates that the Authority is continuing to approve applications for residential development beyond that allocated in the Local Development Plan.

(B) In August 2012 the Authority prepared a brief to tender for consultants to undertake a study into identifying and costing the development of sites allocated in the Local Development Plan and to report how they can be addressed.

(C) Continuing to communicate with landowners and liaise with other stakeholders to investigate intentions to bring land forward for development and to assist in this process wherever possible.

(D) The Authority has reviewed the potential for release of the limited land in its ownership during the preparation of the Local Development Plan. None of the land in its ownership, within the National Park area was appropriate for development, for the following reasons:

1) The land is situated in remote locations;

2) Land is used for other purposes, such as amenity space;

3) It is undeveloped land and forms an integral part of the character of an area;

4) The land is subject to the same deliverability issues as those already identified for allocated sites.

(E) The Authority has recently applied for planning permission on land in its ownership in Pembrokeshire County Council’s planning area (i.e. outside but adjoining the National Park). Permission was granted for 75 dwellings (including 20% affordable housing) and this will contribute to the Council’s 2012 Joint Land Availability Study.

(F) In the Local Development Plan the Authority has allocated land in Pembrokeshire County Council’s ownership within the National Park area which could address a substantial proportion of the National Park Authority’s affordable housing need (see Section 13).

In terms of (B) above the study has now been completed. [[50]](#footnote-50)

Hyder Consulting was commissioned by the Authority in September 2012 to undertake the preparation of a Land Allocation Implementation Study in order to research the costs and requirements, including the potential to release identified constraints to developing allocated sites in the National Park. The following land-use allocations within the Adopted Plan were included within the scope of the study and formed the basis of the study assessments:

* 16 Housing Sites;
* 5 Mixed-Use Sites;
* 1 Employment Site.

The study has focussed on the key physical infrastructure improvements required to bring each of the sites forward for development, along with the key land owner issues. Advice has also been provided on the provision of Community Infrastructure Levy (CIL) and Section 106 Agreements as key factors in the deliverability of allocated development sites.

The focus of the site assessment process within the study has been on those sites which are identified as having ‘abnormal’ costs and/or significant time delays associated with infrastructure provision, such that this may impact on site deliverability within the Plan Period. Through further scrutiny and investigation the extent and nature of any identified site constraints can be properly evaluated.

In identifying the costings necessary for overcoming the identified site constraints, the study has provided a broad range of likely costings against which comparisons for all sites can be made. This has enabled the level of impact of site constraints on project delivery to be determined, set-out within individual Site Proformas, attached as an Appendix to the main study report.

Having established the likely site delivery timescales, information has been provided on development trajectories for sites coming forward, split into three yearly cohorts to show the anticipated start-dates of each of the proposed development sites during the Plan Period (Figure 1 below):

Figure 1 – Deliverability by Cohort and Site Allocation

As a final stage in the assessment process, a Delivery Action Plan has been included setting-out the key issues identified for each site allocation, along with key action points for addressing the issues raised for each site, split between housing, mixed use and employment allocations. The Action Plan has further divided the identified constraints for each site into those that are considered to have ‘HIGH,’ ‘MEDIUM’ or ‘LOW’ impacts, defined as follows:

* HIGH *‘Major’ or unresolved site constraints/land ownership issues that currently impact on delivery timescales*
* MEDIUM *‘Moderate’ site constraints/land ownership issues that may delay delivery within the Plan Period*
* LOW *‘Negligible’ site constraints/land ownership issues that will not preclude delivery within the Plan Period*

The results of this exercise show that of the 22 site allocations assessed as part of the study, a total of 6 sites are shown to have ‘HIGH’ Impacts for which ‘Major’ site constraints have been identified; 13 sites with ‘MEDIUM’ Impacts with ‘Moderate’ site constraints to be addressed and 3 as ‘LOW’ impacts with ‘Negligible site constraints to be resolved (Figure 2 below):

Figure 2 – Level of Impact on Site Deliverability

Specific actions are identified which require further work. One such action will be to engage with landowners to help address issues with bringing forward allocated sites.

There are 30 issues listed in the Hyder report which require action:

* 15 relate to water and drainage issues;
* 4 relate to highways issues;
* 7 relate to where issues surrounding the landowner intentions or complications because of existing uses on site;
* 4 relate to affordable housing issues which are considered to be of medium impact and are copied below.

Table 4

|  |
| --- |
| MEDIUM IMPACT |
| **HA737 – West of Glasfryn Road, St Davids** |
| Site Issues   * Landowner reluctance to develop site due to affordable housing contributions.   Potential funding contributions towards highway improvements along Glasfryn Road to provide site access. |
| Actions   * A Scrutiny Committee has been considering the delivery of affordable housing in the National Park with a final report anticipated in June 2013.   Pembrokeshire Highways Authority to formally consider provision of site access to serve the development site directly off the A487. |
| **HA382 – Castle Way, Dale** |
| Site Issues  Landowner intentions not to develop the site unless requirement for affordable housing provision is reduced. |
| Actions  A Scrutiny Committee has been considering the delivery of affordable housing in the National Park with a final report anticipated in June 2013. |
| **HA813 – Rear of Cross Park, New Hedges** |
| Site Issues  Landowner concerns regarding the impact of affordable housing requirement and consequent delay in the site’s development. |
| Actions   * A Scrutiny Committee has been considering the delivery of affordable housing in the National Park with a final report anticipated in June 2013. * Make available the study findings in support of site promotion. |
| **HA792 – Bank House, Whitchurch Lane, Solva** |
| Site Issues   * Timetable for the Solva WWTW upgrading works will delay the site coming forward for development (March 2015). * Concerns regarding affordable housing requirement of 60% and impact on site development. |
| Actions   * Study findings to be shared with the landowner[[51]](#footnote-51) to inform future planning for site’s development. * A Scrutiny Committee has been considering the delivery of affordable housing in the National Park with a final report anticipated in June 2013. |

**APPENDIX 8**

**Possible actions – Affordable Housing Scrutiny Committee (as at May 2013)**

**Purpose of this paper**

During the Scrutiny process several possible actions have emerged as a result of issues raised. In some instances specific recommendations were made. This paper provides a commentary on:

1. Whether the evidence is in place to take possible actions forward.

2. When this could happen; and

3. Whether the actions are considered to be appropriate for this Authority to take forward.

I have grouped the actions under:

1. Supplementary planning guidance review (Table 1)

2. Streamlining the process (Table 2)

3. Land allocation implementation study (Table 3)

4. Liaison with local partners (Table 4)

5. Exceptions Sites (Table 5)

6. Compulsory Purchase (Table 6)

7. Reviewing Policy 45 of the Local Development Plan (Table 7)

**1. SUPPLEMENTARY PLANNING GUIDANCE REVIEW (Table 1)**

A review of the Authority’s Affordable Housing Supplementary Planning Guidance (main partner for discussion – the Affordable Housing Working Group[[52]](#footnote-52)) can commence immediately. A list of possible actions for this review is set out in Table 1 below.

The proposal (subject to Planning Improvement Funding being awarded) would be to commission consultants to primarily:

1. Review the Authority’s supplementary planning guidance to respond to the recommendations set out in Table 1 below.

2. Carry out an up to date Three Dragons Toolkit assessment taking account of the Pembrokeshire Coast National Park Authority Pembrokeshire Local Development Plan Land Allocation Implementation Study, Final Report April 2013.

3. Contact/meet and negotiate with the land owners and/or land owners agents of the housing allocations of the Local Development Plan to advise of the outcomes of the Three Dragons Toolkit exercise and to provide assistance in bringing sites forward.

4. Streamline the planning application process.

The effect of such changes should be to:

1. Improve the viability of schemes.

2. Provide an opportunity, relatively soon, to approach landowners and developers following review of the affordable housing requirements.

3. Improve access to mortgages for affordable housing.

4. Make the planning application process more effective.

**TABLE 1**

| **Actions** | **Is the evidence in place to do this now?** |
| --- | --- |
| **Update Section 3 of the guidance: ‘What is meant by affordable housing’ to improve the offer available to developers.** |  |
| (a) Explore the potential to improve the offer for developers on private Low Cost Home Ownership/rental properties (but keep them affordable).[[53]](#footnote-53),[[54]](#footnote-54) & [[55]](#footnote-55). Ensure that this is monitored.[[56]](#footnote-56) Ensure benefits are in perpetuity.[[57]](#footnote-57) | No - further work required to assess affordability in the National Park. |
| (b) Explore the potential to improve the offer for developers by using a higher percentage of acceptable cost guidelines for the hand-over of property to a housing association (e.g. 55% instead of 42%).[[58]](#footnote-58) | Yes[[59]](#footnote-59) |
| (c) Land is scarce in the National Park. Explore the opportunity to prioritise the handover of plots rather than built units where there are viability issues. This would allow more units to be built in the long term.[[60]](#footnote-60) | No – further research is needed to assess where this would be the case before advising individual site owners/ developers |
| **Amend Section 10 of the guidance: ‘Other Factors to Consider’ to address design issues raised.** |  |
| (d) Cost of designing in the National Park[[61]](#footnote-61),[[62]](#footnote-62) & [[63]](#footnote-63) include reference to willingness to negotiate on less costly solutions but solutions that are equally suitable in design terms. Provide practical examples. | Yes[[64]](#footnote-64) |
| (e) Trial lower (and cheaper) design standards for affordable housing units on a trial basis (time specific or site specific).  The approach set out above, under (d), is considered to be an acceptable approach for proposals within the National Park. | No. |
| (f) Include reference to the Welsh Government’s current policy that schemes with costs exceeding Acceptable Cost Guidelines may be approved if high acquisition and /or works costs are justified in light of local conditions). Costs over 120% will not be met by the Welsh Government.[[65]](#footnote-65) | Yes[[66]](#footnote-66) |
| (g) The current Supplementary Planning Guidance requires Welsh Government Development Quality Requirements where there is Social Housing Grant support and Welsh Housing Quality Standard where there is no grant and the units are transferred to a Registered Social Landlord. Pembrokeshire County Council’s supplementary planning guidance requires all affordable housing for rent to be to the Welsh Housing Quality Standard. To make this change to this Authority’s guidance would increase costs to the developer and is not recommended. | Yes[[67]](#footnote-67) |
| (h) Lower the standards required for properties taken on by housing associations.[[68]](#footnote-68) The standards set out in the guidance have been agreed with the respective housing associations. Await current research being undertaken by the Welsh Local Government Association[[69]](#footnote-69) regarding the Development Quality Requirements (DQR) Review. The Welsh Government is undertaking a review of Design Quality Review in the context of the pressure on Social Housing Grant funding. | No |
| **Update Section 16 ‘The process and criteria for deciding who is eligible for affordable housing.’ to improve access to mortgages and to reflect the approach taken to occupancy controls in the remainder of Pembrokeshire.** |  |
| (i) Review the Authority’s approach to occupancy controls and mortgage lending to improve the acceptability of proposals for mortgage lending. [[70]](#footnote-70) &[[71]](#footnote-71) &[[72]](#footnote-72) &[[73]](#footnote-73) &[[74]](#footnote-74) | Yes[[75]](#footnote-75) & [[76]](#footnote-76) |
| (j) Liaise with the finance sector to ensure that revised S106 templates are fit for purpose. | Partially.[[77]](#footnote-77) |
| (k) Review allocations policy of the Housing Authority to include local member involvement.[[78]](#footnote-78) This would be a matter for Pembrokeshire County Council. | No |
| (l) Impose occupancy controls on housing associations.[[79]](#footnote-79) [This is contrary to Technical Advice Note 2, paragraph 13.2.](http://wales.gov.uk/topics/planning/policy/tans/tan2/;jsessionid=EAAC01DD35E16C2236B5800C324E19B6?lang=en) However, housing associations can enter into voluntary lettings agreements.[[80]](#footnote-80) | No to formal occupancy controls but yes to voluntary lettings agreements. |
| (m) Engage with Welsh Government to underpin guarantees. |  |

|  |  |
| --- | --- |
| **Update Section 13 ‘Affordable housing requirements on allocated sites’ to reflect the current economic climate.** |  |
| (n) Review Section 13 (which sets out the requirements for all allocated sites in the Plan) of the Supplementary Planning Guidance following a re-run of the Three Dragons Toolkit.[[81]](#footnote-81) &[[82]](#footnote-82) & [[83]](#footnote-83) & [[84]](#footnote-84) This would include any increases in cost such as those referred to by the House Builders Federation. [[85]](#footnote-85) & [[86]](#footnote-86) The product of this exercise will be communicated to the relevant landowners and developers.[[87]](#footnote-87) Is there a need to give small sites short life permissions? Should larger sites have review points in S106 agreements? The appraisal will need to take account of the findings of the Land Allocation Implementation Study March 2012.[[88]](#footnote-88) | No – Three Dragons Toolkit re-run required and external expertise and support is required. |
| (o) Advise Welsh Government that increased build cost requirements, for example the introduction of sprinklers as a statutory requirement, will reduce the level of affordable housing that can be provided. | Yes. |
| **Review Section Section 10 ‘Affordable Housing Contribution’[[89]](#footnote-89).** |  |
| (p) Does the affordable housing contribution per sq.m. approach take account of the economies of scale that larger sites enjoy?  (q) Is there a clear definition of gross internal floorspace – car ports, balconies, store rooms?  There is no policy on additional floorspace built for example, to house a dependant relative or for care of the disabled. | No. Further research is required for the first query. Include in the consultant’s study.  The contribution can only be applied to new market dwellings and not extensions to existing properties or properties with occupancy controls. |

**2. STREAMLINING THE PROCESS (Table 2)**

There are areas that could be explored to streamline the process. The Authority also needs to be also aware of the current commission by the Welsh Government into the ‘Evaluation of the planning permission process for housing’. It is due to publish its findings around September 2013.[[90]](#footnote-90)

There is also (possibly linked) an ‘Inquiry into barriers to home building in Wales’. The National Assembly for Wales’ Communities, Equality and Local Government Committee is to undertake a short inquiry into barriers to home building in Wales.

**TABLE 2**

| **Recommended Actions** | **Is the evidence in place to do this now?** |
| --- | --- |
| **Streamline the process.[[91]](#footnote-91) & [[92]](#footnote-92)** |  |
| (a) Explore areas where the planning application process could be streamlined for example:  (i) More planning obligations that are capable of self completion;  (ii) Update the Authority’s planning section of the website to highlight the negotiating protocol the Authority operates;[[93]](#footnote-93)  (iii) Developers to pay for independent viability analysis;  (iv) Streamlining the occupancy controls in agreements;  (v) Use standard covenants to ensure mortgagability;[[94]](#footnote-94)  (vi) Can the Authority be more flexible on tenure mix and accommodation mix?[[95]](#footnote-95) | No except for b) and d) and e). This would be included in the Consultants commission referred to under the review of supplementary planning guidance above. |
| (b) Include weblinks on the Authority’s website to lenders/developers sympathetic to the delivery of affordable housing.  Await review of S106 agreements templates to ensure acceptability with mortgage lenders before including weblinks. Ensure mortgage lenders are in agreement. | No. |

**3. LAND ALLOCATION IMPLEMENTATION STUDY MARCH 2013[[96]](#footnote-96) (Table 3)**

Hyder Consulting were commissioned by the Authority in September 2012 to research the costs and requirements, including the potential to release identified constraints to developing allocated sites in the National Park. The study focussed on 22 sites and concludes with a Delivery Action Plan for the Authority to pursue (pages 34 to 39). Specific actions are identified which require further work.

The effect of such action would be to engage with landowners to help address issues with bringing forward allocated sites.

**TABLE 3**

| **Action** | **Is the evidence in place to do this?** |
| --- | --- |
| (a) Take forward the Delivery Action Plan of the Hyder Consulting study ‘Land Allocation Implementation Study March 2013. See Action (n) under Table 1. | Yes the Hyder Study is available but viability re- testing is required. |
| (b) Make direct contact with landowners, developers etc. to provide clarity on what is required, to explain the negotiation process undertaken with the use of Three Dragons. | This would be included in the Consultants commission referred to under the review of supplementary planning guidance above. |
| (c) Begin a ‘change in perception’ campaign. | No. The Authority would need to initiate on the back of the Consultant’s commission referred to above. |

**LIASION WITH LOCAL PARTNERS[[97]](#footnote-97) (Table 4)**

**TABLE 4**

| **Action** | **Is the evidence in place to do this?** |
| --- | --- |
| (a) Work with Registered Social Landlords to take more of a lead in the development of sites.[[98]](#footnote-98) & [[99]](#footnote-99) There are numerous small scale sites that Housing Associations could potentially take the lead on. Millbay Homes which has only recently been launched by Pembrokeshire Housing is one such initiative. | The Authority holds biennial meetings with both housing associations operating in the County and would wish to extend those discussions with operations such as Millbay Homes. |
| (b) Pembrokeshire County Council is a very significant land owner (circa 44% allocated units in Local Development Plan and very good sites).[[100]](#footnote-100) & [[101]](#footnote-101) Explore opportunities to work in partnership with Pembrokeshire County Council.[[102]](#footnote-102) | See Action (i) under Table 1. |
| (c) Liaise with partners at the Affordable Housing Working Group to learn from examples of good practice elsewhere.[[103]](#footnote-103) | Ongoing. |
| (d) Ensure the Authority has a robust and current understanding of the housing market and need. Address housing needs of older people.[[104]](#footnote-104) Pembrokeshire County Council is submitting a Planning Improvement Bid for 2013-14 which this Authority is party to. | No – research needed.  Dependant on Planning Improvement Funding award. |
| (e) Make full use of existing homes (private, social & empties). This is beyond the Authority’s powers as a planning authority.[[105]](#footnote-105) | No. |
| (f) Limit Right to Buy Sales. This is beyond the Authority’s powers as a planning authority. Pembrokeshire County Council will consult this Authority on a proposed strategy regarding Right to Buy.[[106]](#footnote-106) | No. |
| (g) Affordable housing Register to identify purchasers. [[107]](#footnote-107) Pembrokeshire County Council is submitting a Planning Improvement Bid for 2013-14 which this Authority is party to. | Partially. |
| (h) Maximise Council Tax income.[[108]](#footnote-108) This is beyond the Authority’s powers as a planning authority. | No. |

**5. EXCEPTIONS SITES (Table 5)**

**TABLE 5**

| **Action** | **Is the evidence in place to do this?** |
| --- | --- |
| (a) Explore new ways to encourage the release of exceptions sites.[[109]](#footnote-109) & [[110]](#footnote-110) Pembrokeshire County Council is submitting a Planning Improvement Bid for 20-13-14 which this Authority is party to. | No – research needed.  Dependant on Planning Improvement Funding award. |

**6. COMPULSORY PURCHASE (Table 6)**

**TABLE 6**

| **Action** | **Is the evidence in place to do this?** |
| --- | --- |
| (a) Compulsory purchase where landowners were intentionally not bringing sites forward.[[111]](#footnote-111) | No – research needed. |

**7. LOCAL DEVELOPMENT POLICY 45 AFFORDABLE HOUSING (Table 7)**

A partial review (including a review of targets) of the Authority’s Local Development Plan[[112]](#footnote-112)&[[113]](#footnote-113), i.e., Policy 45 Affordable Housing would necessarily be a longer term proposition[[114]](#footnote-114). The ability to do a partial review of policy is a matter that the current Local Development Plan Process Refinement Exercise is considering but the outcome from that is some time away. Welsh Government officials hope to report to the Minister in the Autumn 2013 before making any changes.

A swift process is needed for partial revision/alteration, especially where the strategy isn't being changed so this will most likely require amendment to the regulations too.

The Local Development Plan formal review is programmed for the end of the financial year 2014/15. The actions recommended earlier in this report can inform this programmed review or any earlier review considered necessary when the regulations are in place.

The current Local Development Plan framework along with the Supplementary Planning Guidance (in its current and proposed form) allows for negotiation in terms of viability to take place. It also allows for the Authority to target developers and landowners on specific land allocations with reduced affordable housing requirements where this has been evidenced.

**TABLE 7**

| **Action** | **Is the evidence in place to do this?** |
| --- | --- |
| (a) Allocate more land to reduce the cost of plots. The suggestion is that this would lower the price of plots. | No and it would require a review of the Plan. |
| (b) Allocate sites specifically for affordable housing. | No and it would require a review of the Plan. |
| (c) In developing or revising policies consideration should be given to the risk involved in being a leader, setting the scene for others to follow, reject or modify as against a follower learning from the approach of others and modifying, adopting or ignoring it to meet one's own objectives and circumstances.  The Authority is bound by its initial Delivery Agreement for the preparation of its Plan. It was not a ‘leader’ in the early days of preparation and learned from others. It became the first planning authority to adopt its Local Development Plan as other plan’s timetables were delayed. Officers are not aware of this occurring with the progression of other Plan’s in Wales. | No. |
| (d) Policies should contain the ability to be flexible to meet changed circumstances throughout their life, and to do so at the time of those changing circumstances rather than necessarily sticking to set review dates and this should be built in to any approval process by Welsh Government.  There is flexibility inherent in the Policy and Supplementary Planning Guidance.[[115]](#footnote-115) See also list of Actions under Table 1. Policies require time to bed in. | Yes there is flexibility in Policy 45. |

1. One on the effectiveness of the Sustainable Development Fund in encouraging low carbon communities, with the second on whether both National Park Authorities were delivering their statutory rights of way duty effectively [↑](#footnote-ref-1)
2. [Pembrokeshire Coast National Park Local Development Plan, September 2010, Glossary of Terms](http://www.pembrokeshirecoast.org.uk/Files/Files/Dev%20Plans/LDPTextEng/LDP6.pdf) [↑](#footnote-ref-2)
3. [Planning Handbook – A guide for Local Authority Members](http://www.wlga.gov.uk/download.php?id=5025&l=1) [↑](#footnote-ref-3)
4. [Housing Background Paper (Update March 2010) – Document Exam14 - Appendices 2 and 3](http://www.pembrokeshirecoast.org.uk/default.asp?PID=237) [↑](#footnote-ref-4)
5. [Inspector’s Report on the Examination into the Pembrokeshire Coast National Park Local Development Plan, paragraphs 3.8 to 3.21 ‘Housing Provision’](http://cms6.pcnpa.org.uk/files/files/Committee/Scrutiny/11_09_13/Inspector's%20reportFINAL%20L9503-LDP-09-04.pdf) [↑](#footnote-ref-5)
6. [Welsh Government email regarding partial review of Local Development Plans](http://cms6.pcnpa.org.uk/files/files/Committee/Scrutiny/11_09_13/Welsh%20Government%20email.pdf) [↑](#footnote-ref-6)
7. [New House Building in Wales, January to March 2013](http://wales.gov.uk/topics/statistics/headlines/housing2013/new-house-building-january-march-2013/?lang=en) First Release, Statistics for Wales [↑](#footnote-ref-7)
8. <http://www.guardian.co.uk/business/2013/jul/09/royal-institution-of-chartered-surveyors-upbeat-housing-market> [↑](#footnote-ref-8)
9. [Key Outcomes, page 131 of the Pembrokeshire Coast National Park Local Development Plan, September 2010](http://www.pembrokeshirecoast.org.uk/files/files/Dev%20Plans/AdoptedSPG/LDPAppendices.pdf) [↑](#footnote-ref-9)
10. [Non Affordable Housing Applications Approved.docx](http://cms6.pcnpa.org.uk/files/files/Committee/Scrutiny/11_09_13/Apps%20Approved.docx) [↑](#footnote-ref-10)
11. [Table 5 – Additional affordable housing delivered through planning obligations and on affordable housing exception sites, by local authority area, 2011-12 (a), Affordable Housing Provision in Wales, 2011-12 First Release, Statistics for Wales, October 2012.](http://wales.gov.uk/topics/statistics/headlines/housing2012/121025/?lang=en) [↑](#footnote-ref-11)
12. [Table of Housing Sites May 2013 update.docx](http://cms6.pcnpa.org.uk/files/files/Committee/Scrutiny/11_09_13/Table%20of%20Housing%20Sites%20May%202013%20update.docx) [↑](#footnote-ref-12)
13. [http://cms6.pcnpa.org.uk/files/files/Committee/Scrutiny/11\_09\_13/Copy of Affordable housing 19 06 13.xls](http://cms6.pcnpa.org.uk/files/files/Committee/Scrutiny/11_09_13/Copy%20of%20Affordable%20housing%2019%2006%2013.xls) [↑](#footnote-ref-13)
14. [Philip Williams, Property Review Manager, Pembrokeshire County Council presentation to Scrutiny Committee 6th March 2013](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/06_03_13/Philip%20Williams%20PCNPA%20Scrutiny%20Committee%206th%20March%202013.ppt), [↑](#footnote-ref-14)
15. [Inspector’s Report concerning the Pembrokeshire Coast National Park Authority Joint Housing Land Availability Study (JHLAS) April 2011](http://www.pembrokeshirecoast.org.uk/files/files/Dev%20Plans/AdoptedSPG/JHLA/515560%20PCNPA%20JHLAS%20Inspector%20Report-%2025-04-12.pdf), paragraph 16. [↑](#footnote-ref-15)
16. [Three Dragons 2012\_13 evidence.docx](http://cms6.pcnpa.org.uk/files/files/Committee/Scrutiny/11_09_13/Three%20Dragons%202012_13%20evidence.docx) [↑](#footnote-ref-16)
17. Paragraph 4, [Minutes of the Scrutiny Committee, Pembrokeshire Coast National Park Authority, 28th November 2012,](http://www.pembrokeshirecoast.org.uk/files/files/Committee/Scrutiny/23_01_13/Minutes%20Scrutiny%20281112.doc) [↑](#footnote-ref-17)
18. [PCNPA Land Allocation Implementation Study – Final Report](http://cms6.pcnpa.org.uk/Files/files/Committee/Scrutiny/10_04_13/PCNPA%20Land%20Allocation%20Study%20Final%20Report_v2.pdf) [↑](#footnote-ref-18)
19. <http://wales.gov.uk/about/cabinet/cabinetstatements/2013/homebuilding/?lang=en> [↑](#footnote-ref-19)
20. [Scrutiny Committee: 6th March 2013 Item 6](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/06_03_13/TCP%20-%20Housing%20-%20Research%20-%20B02%20-%20Project%20Brief.pdf) [↑](#footnote-ref-20)
21. Minute 6, [Minutes of Pembrokeshire Coast National Park Authority Scrutiny Committee, 28th November 2013](http://www.pembrokeshirecoast.org.uk/files/files/Committee/Scrutiny/23_01_13/Minutes%20Scrutiny%20281112.doc) [↑](#footnote-ref-21)
22. [“Taking the Long View” – Welsh Government consultation on the draft Policy Statement for Protected Landscapes in Wales](http://wales.gov.uk/docs/drah/consultation/130628protectlandscapedraften.pdf) [↑](#footnote-ref-22)
23. [Welsh Assembly Government, The Affordable Housing Toolkit, page 11, paragraph 3.20](http://wales.gov.uk/docs/desh/publications/060628affhousingtoolkiten.pdf) [↑](#footnote-ref-23)
24. [Report on the Examination into the Pembrokeshire Coast National Park Local Development Plan Paragraph 3.12](http://cms6.pcnpa.org.uk/files/files/Committee/Scrutiny/11_09_13/Inspector's%20reportFINAL%20L9503-LDP-09-04.pdf) [↑](#footnote-ref-24)
25. <http://www.wlga.gov.uk/publications-and-consultation-responses-env/securing-mortgage-access-for-affordable-housing/> [↑](#footnote-ref-25)
26. Key population statistics from the 2011 Census, released February 19th 2013, for the Pembrokeshire Coast National Park [↑](#footnote-ref-26)
27. [Page 54, Pembrokeshire Local Development Plan, Policy SP8, Affordable Housing Requirement](http://www.pembrokeshire.gov.uk/content.asp?id=27072&language=) [↑](#footnote-ref-27)
28. [Table 16d, Housing Background Paper, Pembrokeshire Coast National Park Local Development Plan](http://www.pembrokeshirecoast.org.uk/default.asp?PID=237) [↑](#footnote-ref-28)
29. [Page 54, Pembrokeshire Local Development Plan, Policy SP8, Affordable Housing Requirement](http://www.pembrokeshire.gov.uk/content.asp?id=27072&language=) [↑](#footnote-ref-29)
30. 530 affordable housing provision for 14 years divided by 14 and multiplied by 10. [↑](#footnote-ref-30)
31. [Affordable Housing Policies in Welsh Local Planning Authorities.docx](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/23_01_13/Affordable%20Housing%20Policies%20in%20Welsh%20Local%20Planning%20Authorities.docx) [↑](#footnote-ref-31)
32. [Policy GN28, Local Needs Affordable Housing, page 107, Pembrokeshire County Council Local Development Plan. Adopted February 2013](http://www.pembrokeshire.gov.uk/content.asp?id=27072&language=) [↑](#footnote-ref-32)
33. [Policy S05, Ceredigion Local Development Plan (adopted)](http://www.ceredigion.gov.uk/index.cfm?articleid=4761) [↑](#footnote-ref-33)
34. [Affordable Housing Policies in National Park in England and Wales.docx](http://cms6.pcnpa.org.uk/files/files/Committee/Scrutiny/11_09_13/Affordable%20Housing%20Policies%20in%20National%20Park%20in%20England%20and%20Wales.docx) [↑](#footnote-ref-34)
35. <http://www.beacons-npa.gov.uk/static/LDP/LDP/02%20Deposit/Core%20Documents/L-D-CD-1-BBNPA%20Deposit%20Written%20Statemnet.pdf> [↑](#footnote-ref-35)
36. <http://www.eryri-npa.gov.uk/__data/assets/pdf_file/0004/184684/ELDP-Final-6.1.12.pdf> [↑](#footnote-ref-36)
37. [Pembrokeshire Coast National Park Local Development Plan, Background Paper : Housing](http://www.pembrokeshirecoast.org.uk/default.asp?PID=237) [↑](#footnote-ref-37)
38. [Report on Joint Housing Land Availability Study](http://www.pembrokeshirecoast.org.uk/files/files/Dev%20Plans/AdoptedSPG/JHLA/515560%20PCNPA%20JHLAS%20Inspector%20Report-%2025-04-12.pdf) [↑](#footnote-ref-38)
39. [Report on Joint Housing Land Availability Study](http://www.pembrokeshirecoast.org.uk/files/files/Dev%20Plans/AdoptedSPG/JHLA/515560%20PCNPA%20JHLAS%20Inspector%20Report-%2025-04-12.pdf) [↑](#footnote-ref-39)
40. <http://wales.gov.uk/topics/statistics/headlines/housing2012/121025/?lang=en> [↑](#footnote-ref-40)
41. National Park Authority, Minutes of the Scrutiny Committee [28th November 2012](http://www.pembrokeshirecoast.org.uk/files/files/Committee/Scrutiny/23_01_13/Minutes%20Scrutiny%20281112.doc), page 2, paragraph 4. [↑](#footnote-ref-41)
42. [Policy SP7, Housing Requirement, page 50, Pembrokeshire County Council, Local Development Plan adopted February 2013](http://www.pembrokeshire.gov.uk/content.asp?id=27072&language=) [↑](#footnote-ref-42)
43. [Appendix 3, page 146, Table 1 Housing Requirement, Pembrokeshire County Council’s Local Development Plan adopted February 2013](http://www.pembrokeshire.gov.uk/content.asp?id=27072&language=) [↑](#footnote-ref-43)
44. Key population statistics from the 2011 Census, released February 19th 2013, for the Pembrokeshire Coast National Park [↑](#footnote-ref-44)
45. [Page 50, Pembrokeshire Local Development Plan, Policy SP7](http://www.pembrokeshire.gov.uk/content.asp?id=27072&language=) [↑](#footnote-ref-45)
46. [Page 50, Pembrokeshire Local Development Plan, Policy SP7](http://www.pembrokeshire.gov.uk/content.asp?id=27072&language=) [↑](#footnote-ref-46)
47. 1,600 requirement for 14 years divided by 14 and multiplied by 10 [↑](#footnote-ref-47)
48. [9.2.3, Planning Policy Wales, Edition 5, November 2012](http://wales.gov.uk/docs/desh/publications/121107ppw5chapter9en.pdf) [↑](#footnote-ref-48)
49. [PCNPA Housing Land Availability Study 2011](http://www.pembrokeshirecoast.org.uk/files/files/Dev%20Plans/AdoptedSPG/JHLA/PCNP%20JHLA%20Study%202011.pdf) [↑](#footnote-ref-49)
50. [Scrutiny Committee:10th April 2013 – Item 6](http://cms6.pcnpa.org.uk/Files/files/Committee/Scrutiny/10_04_13/PCNPA%20Land%20Allocation%20Study%20Final%20Report_v2.pdf) [↑](#footnote-ref-50)
51. Factual correction made to the Table – should refer to landowner rather than Pembrokeshire County Council. [↑](#footnote-ref-51)
52. [Lyn Hambidge Presentation, Head of Housing Commissioning, Pembrokeshire County Council 28th November 2012](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/28_11_12/Lyn%20Hambidge.ppt). [↑](#footnote-ref-52)
53. [Martina Dunne Head of Park Direction, Pembrokeshire Coast National Park Authority, Presentation to Scrutiny Committee 23rd January 2013](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/23_01_13/Scrutiny%20Committee%2023%20Jan%2013.pptx)

    [Lin Cousins Three Dragons Presentation to Scrutiny Committee 10th April 2013](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/10_04_13/LC%20presentation%20PCNP%20as%20shown%2010%20April%2013%2004%2012.pdf) [↑](#footnote-ref-53)
54. [Minutes of the Scrutiny Committee – 28th November 2012](http://www.pembrokeshirecoast.org.uk/files/files/Committee/Scrutiny/23_01_13/Minutes%20Scrutiny%20281112.doc), Section 8 (second ref), paragraph 7 Peter Hughes, managing Director, Principality Commercial, principality Building Society [↑](#footnote-ref-54)
55. [Scrutiny Committee: 10th April 2013](http://www.pembrokeshirecoast.org.uk/default.asp?PID=411) Item 5(b) [Guy Thomas letter](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/10_04_13/Guy%20Thomas.pdf),Q4. [↑](#footnote-ref-55)
56. [Sue Finch, Welsh Local Government Association, Presentation to Scrutiny Committee 6th March 2013](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/06_03_13/WLGA.ppt), Slide 7. [↑](#footnote-ref-56)
57. [Sue Finch, Welsh Local Government Association, Presentation to Scrutiny Committee 6th March 2013](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/06_03_13/WLGA.ppt), Slide 7 [↑](#footnote-ref-57)
58. [Martina Dunne Head of Park Direction, Pembrokeshire Coast National Park Authority, Presentation to Scrutiny Committee 23rd January 2013](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/23_01_13/Scrutiny%20Committee%2023%20Jan%2013.pptx)

    [Lin Cousins Three Dragons Presentation to Scrutiny Committee 10th April 2013](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/10_04_13/LC%20presentation%20PCNP%20as%20shown%2010%20April%2013%2004%2012.pdf) [↑](#footnote-ref-58)
59. [Pembrokeshire County Council Draft Supplementary Planning Guidance](http://www.pembrokeshire.gov.uk/content.asp?id=21476&language). Final guidance agreed at Cabinet 20th May 2013. Awaiting publication. [↑](#footnote-ref-59)
60. [Martina Dunne Head of Park Direction, Pembrokeshire Coast National Park Authority, Presentation to Scrutiny Committee 23rd January 2013](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/23_01_13/Scrutiny%20Committee%2023%20Jan%2013.pptx) [↑](#footnote-ref-60)
61. [Lyn Hambidge Presentation, Head of Housing Commissioning, Pembrokeshire County Council 28th November 2012](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/28_11_12/Lyn%20Hambidge.ppt). [↑](#footnote-ref-61)
62. [Minutes of the Scrutiny Committee – 28th November 2012](http://www.pembrokeshirecoast.org.uk/files/files/Committee/Scrutiny/23_01_13/Minutes%20Scrutiny%20281112.doc), Section 7, paragraph 4 Matthew Owen, Rural Housing Enabler [↑](#footnote-ref-62)
63. [Minutes of the Scrutiny Committee – 28th November 2012](http://www.pembrokeshirecoast.org.uk/files/files/Committee/Scrutiny/23_01_13/Minutes%20Scrutiny%20281112.doc), Section 8, paragraph 8 Pembrokeshire & Cantref Housing Associations [↑](#footnote-ref-63)
64. [Presentation by National Park Authority Officers to the 23rd January Scrutiny Committee](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/23_01_13/Scrutiny%20Committee%2023%20Jan%2013.pptx), Point 3 page 42 [↑](#footnote-ref-64)
65. [Evidence submitted by Homes & Places, Welsh Government, to Scrutiny Committee 10th April 2013](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/10_04_13/WG%20Response.doc) page 5, row 2. [↑](#footnote-ref-65)
66. [Evidence submitted by Homes & Places, Welsh Government, to Scrutiny Committee 10th April 2013](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/10_04_13/WG%20Response.doc) page 4, last row. [↑](#footnote-ref-66)
67. [Section 10: Pembrokeshire County Council’s Affordable Housing Supplementary Planning Guidance](http://www.pembrokeshire.gov.uk/content.asp?id=21476&language=) [↑](#footnote-ref-67)
68. [Lin Cousins Three Dragons Presentation to Scrutiny Committee 10th April 2013](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/10_04_13/LC%20presentation%20PCNP%20as%20shown%2010%20April%2013%2004%2012.pdf) [↑](#footnote-ref-68)
69. <http://www.wlga.gov.uk/equalities-and-social-justice-bulletins> June 2013 [↑](#footnote-ref-69)
70. Martina Dunne Head of Park Direction, Pembrokeshire Coast National Park Authority, Presentation to Scrutiny Committee 23rd January 2013

    [Lin Cousins Three Dragons Presentation to Scrutiny Committee 10th April 2013](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/10_04_13/LC%20presentation%20PCNP%20as%20shown%2010%20April%2013%2004%2012.pdf) [↑](#footnote-ref-70)
71. [Minutes of the Scrutiny Committee – 28th November 2012](http://www.pembrokeshirecoast.org.uk/files/files/Committee/Scrutiny/23_01_13/Minutes%20Scrutiny%20281112.doc), Section 8 (second ref), paragraph 5 Peter Hughes, managing Director, Principality Commercial, principality Building Society [↑](#footnote-ref-71)
72. [Philip Williams, Property Review Manager, Pembrokeshire County Council presentation to Scrutiny Committee 6th March 2013](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/06_03_13/Philip%20Williams%20PCNPA%20Scrutiny%20Committee%206th%20March%202013.ppt), Slide 9 [↑](#footnote-ref-72)
73. [Lin Cousins Three Dragons Presentation to Scrutiny Committee 10th April 2013](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/10_04_13/LC%20presentation%20PCNP%20as%20shown%2010%20April%2013%2004%2012.pdf) [↑](#footnote-ref-73)
74. [Sue Finch, Welsh Local Government Association, Presentation to Scrutiny Committee 6th March 2013](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/06_03_13/WLGA.ppt), Slide 6. [↑](#footnote-ref-74)
75. <http://www.wlga.gov.uk/securing-mortgage-access-for-affordable-housing-l-guidance> [↑](#footnote-ref-75)
76. <http://www.choicehomespembrokeshire.org/content.asp?id=1014&language> [↑](#footnote-ref-76)
77. <http://www.wlga.gov.uk/securing-mortgage-access-for-affordable-housing-l-guidance> [↑](#footnote-ref-77)
78. [Scrutiny](http://www.pembrokeshirecoast.org.uk/default.asp?PID=411) Committee: 10th April 2013: Item 5(b): [Guy Thomas letter](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/10_04_13/Guy%20Thomas.pdf),Q3 [↑](#footnote-ref-78)
79. [Scrutiny](http://www.pembrokeshirecoast.org.uk/default.asp?PID=411) Committee: 10th April 2013: Item 5(b): [Guy Thomas letter](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/10_04_13/Guy%20Thomas.pdf),Q. [↑](#footnote-ref-79)
80. [Sue Finch, Welsh Local Government Association, Presentation to Scrutiny Committee 6th March 2013](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/06_03_13/WLGA.ppt), Slide 5 [↑](#footnote-ref-80)
81. [Minutes of the Scrutiny Committee – 28th November 2012](http://www.pembrokeshirecoast.org.uk/files/files/Committee/Scrutiny/23_01_13/Minutes%20Scrutiny%20281112.doc), Section 7, paragraph 2 Matthew Owen, Rural Housing Enabler [↑](#footnote-ref-81)
82. [Minutes of the Scrutiny Committee – 28th November 2012](http://www.pembrokeshirecoast.org.uk/files/files/Committee/Scrutiny/23_01_13/Minutes%20Scrutiny%20281112.doc), Section 8, paragraph 11 &12 &15 Pembrokeshire & Cantref Housing Associations [↑](#footnote-ref-82)
83. [Minutes of the Scrutiny Committee 6th March 2013](http://www.pembrokeshirecoast.org.uk/default.asp?PID=411) [Presentation by Andrew Crompton, Persimmon Homes Wales](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/06_03_13/persimmon%20Presentation%20on%20Pembrokeshire.ppt), Item 5 paragraph 2. [↑](#footnote-ref-83)
84. [Philip Williams, Property Review Manager, Pembrokeshire County Council presentation to Scrutiny Committee 6th March 2013](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/06_03_13/Philip%20Williams%20PCNPA%20Scrutiny%20Committee%206th%20March%202013.ppt), Slides 5 & 7 [↑](#footnote-ref-84)
85. [Scrutiny Committee: 10th April 2013](http://www.pembrokeshirecoast.org.uk/default.asp?PID=411): Item 5(a) Home Builders Federation submission [↑](#footnote-ref-85)
86. [Scrutiny Committee: 10th April 2013](http://www.pembrokeshirecoast.org.uk/default.asp?PID=411): Item 5(b) Guy Thomas letter, Q2, paragraph C. [↑](#footnote-ref-86)
87. [Sue Finch, Welsh Local Government Association, Presentation to Scrutiny Committee 6th March 2013](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/06_03_13/WLGA.ppt), Slide 7 [↑](#footnote-ref-87)
88. [Scrutiny Committee:](http://www.pembrokeshirecoast.org.uk/default.asp?PID=411) 10th April 2013

    [Lin Cousins, Three Dragons, Presentation to Scrutiny Committee 10th April 2013](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/10_04_13/LC%20presentation%20PCNP%20as%20shown%2010%20April%2013%2004%2012.pdf) [↑](#footnote-ref-88)
89. [Philip Williams, Property Review Manager, Pembrokeshire County Council presentation to Scrutiny Committee 6th March 2013](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/06_03_13/Philip%20Williams%20PCNPA%20Scrutiny%20Committee%206th%20March%202013.ppt), Slide 10 [↑](#footnote-ref-89)
90. [Scrutiny Committee: 6th March 2013](http://www.pembrokeshirecoast.org.uk/default.asp?PID=411) Item 6. [↑](#footnote-ref-90)
91. [Lin Cousins, Three Dragons, Presentation to Scrutiny Committee 10th April 2013](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/10_04_13/LC%20presentation%20PCNP%20as%20shown%2010%20April%2013%2004%2012.pdf) [↑](#footnote-ref-91)
92. [Scrutiny Committee: 10th April 2013](http://www.pembrokeshirecoast.org.uk/default.asp?PID=411): Item 5(b) Guy Thomas letter, Q2, paragraph A. [↑](#footnote-ref-92)
93. [Lin Cousins, Three Dragons, Presentation to Scrutiny Committee 10th April 2013](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/10_04_13/LC%20presentation%20PCNP%20as%20shown%2010%20April%2013%2004%2012.pdf) [↑](#footnote-ref-93)
94. [Sue Finch, Welsh Local Government Association, Presentation to Scrutiny Committee 6th March 2013](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/06_03_13/WLGA.ppt), Slide 7 [↑](#footnote-ref-94)
95. [Scrutiny](http://www.pembrokeshirecoast.org.uk/default.asp?PID=411) Committee: 10th April 2013: Item 5(b) [Guy Thomas letter](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/10_04_13/Guy%20Thomas.pdf), General [↑](#footnote-ref-95)
96. [Scrutiny Committee:10th April 2013](http://www.pembrokeshirecoast.org.uk/default.asp?PID=411) [↑](#footnote-ref-96)
97. [Sue Finch, Welsh Local Government Association, Presentation to Scrutiny Committee 6th March 2013](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/06_03_13/WLGA.ppt), Slide 5 [↑](#footnote-ref-97)
98. [Lin Cousins, Three Dragons, Presentation to Scrutiny Committee 10th April 2013](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/10_04_13/LC%20presentation%20PCNP%20as%20shown%2010%20April%2013%2004%2012.pdf) [↑](#footnote-ref-98)
99. [Sue Finch, Welsh Local Government Association, Presentation to Scrutiny Committee 6th March 2013](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/06_03_13/WLGA.ppt), Slide 6. [↑](#footnote-ref-99)
100. [Lin Cousins, Three Dragons, Presentation to Scrutiny Committee 10th April 2013](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/10_04_13/LC%20presentation%20PCNP%20as%20shown%2010%20April%2013%2004%2012.pdf) [↑](#footnote-ref-100)
101. [Philip Williams, Property Review Manager, Pembrokeshire County Council presentation to Scrutiny Committee 6th March 2013](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/06_03_13/Philip%20Williams%20PCNPA%20Scrutiny%20Committee%206th%20March%202013.ppt), Slide 2 [↑](#footnote-ref-101)
102. [Sue Finch, Welsh Local Government Association, Presentation to Scrutiny Committee 6th March 2013](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/06_03_13/WLGA.ppt), Slide 6. [↑](#footnote-ref-102)
103. [Scrutiny Committee: 10th April 2013: Item 5(c) Home and Places, Welsh Government evidence](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/10_04_13/WG%20Response.doc), page 4 row 3. [↑](#footnote-ref-103)
104. [Sue Finch, Welsh Local Government Association, Presentation to Scrutiny Committee 6th March 2013](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/06_03_13/WLGA.ppt), Slide 5 & 6. [↑](#footnote-ref-104)
105. [Sue Finch, Welsh Local Government Association, Presentation to Scrutiny Committee 6th March 2013](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/06_03_13/WLGA.ppt), Slide 6. [↑](#footnote-ref-105)
106. [Minutes of the Scrutiny Committee, 28th November 2013](http://www.pembrokeshirecoast.org.uk/files/files/Committee/Scrutiny/23_01_13/Minutes%20Scrutiny%20281112.doc), page 4 first paragraph. [Pembrokeshire Coast National Park - Committee Papers](http://www.pembrokeshirecoast.org.uk/default.asp?PID=411) [↑](#footnote-ref-106)
107. [Sue Finch, Welsh Local Government Association, Presentation to Scrutiny Committee 6th March 2013](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/06_03_13/WLGA.ppt), Slide 5. [↑](#footnote-ref-107)
108. [Sue Finch, Welsh Local Government Association, Presentation to Scrutiny Committee 6th March 2013](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/06_03_13/WLGA.ppt), Slide 5. [↑](#footnote-ref-108)
109. [Lin Cousins, Three Dragons, Presentation to Scrutiny Committee 10th April 2013](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/10_04_13/LC%20presentation%20PCNP%20as%20shown%2010%20April%2013%2004%2012.pdf) [↑](#footnote-ref-109)
110. [Sue Finch, Welsh Local Government Association, Presentation to Scrutiny Committee 6th March 2013](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/06_03_13/WLGA.ppt), Slide 7 [↑](#footnote-ref-110)
111. [Minutes of the Scrutiny Committee – 28th November 2012](http://www.pembrokeshirecoast.org.uk/files/files/Committee/Scrutiny/23_01_13/Minutes%20Scrutiny%20281112.doc), Section 7, paragraph 2 Matthew Owen, Rural Housing Enabler [↑](#footnote-ref-111)
112. [Scrutiny](http://www.pembrokeshirecoast.org.uk/default.asp?PID=411) Committee: 10th April 2013: Item 5(a) [Home Builders Federation](http://www.pembrokeshirecoast.org.uk/Files/files/Committee/Scrutiny/10_04_13/PCNP%20Scrutiny%20Committee%20-%20HBF%20Response.pdf) [↑](#footnote-ref-112)
113. [Minutes of the Scrutiny Committee – 28th November 2012](http://www.pembrokeshirecoast.org.uk/files/files/Committee/Scrutiny/23_01_13/Minutes%20Scrutiny%20281112.doc), Section 8, paragraph 3 Pembrokeshire & Cantref Housing Associations [↑](#footnote-ref-113)
114. ..\Scrutiny 23 January\RE Formal review of a Local Development Plan.msg

     [Minutes of the Scrutiny Committee – 28th November 2012](http://www.pembrokeshirecoast.org.uk/files/files/Committee/Scrutiny/23_01_13/Minutes%20Scrutiny%20281112.doc), Section 8, paragraph 11 Pembrokeshire & Cantref Housing Associations [↑](#footnote-ref-114)
115. [Inspector’s Report on Joint Housing Land Availability Study](http://www.pembrokeshirecoast.org.uk/files/files/Dev%20Plans/AdoptedSPG/JHLA/515560%20PCNPA%20JHLAS%20Inspector%20Report-%2025-04-12.pdf), 14th March 2012, paragraph 16, page 4. [↑](#footnote-ref-115)