

HS7/AP1 – PCNPA to consider the implications of the letter from the Minister for Housing and Local Government dated 8 th July 2019 for the replacement LDP and provide their comments to the Inspector.	31 st August 2019	MD	
---	------------------------------	----	--

The pertinent paragraph from the letter is: When reviewing LDPs local planning authorities must make provision for affordable housing led housing sites. **Such sites will include at least 50% affordable housing, which is defined as social rented housing provided by local authorities and registered social landlords, and intermediate housing where prices or rents are above those of social rent but below market levels and there are secure arrangements to recycle receipts to use for future affordable housing where full ownership is achieved.** In the first instance affordable housing led housing sites should make use of public land. Where public land is not available, privately owned land may be identified. Sites should not be inferior in any way to sites which are being promoted for market housing.

In terms of publically owned land there were x number of sites on the Candidate Site Register. A Summary of the conclusions reached for each are outlined below:

Candidate Sites on Public Land

Site Ref	Site Address and Ownership	Proposal	Conclusion
010	Burrows, Freshwater East – Pembrokeshire Coast National Park Authority	Protection from unsuitable developments. Confirmation that The Burrows area is for conservation	The area identified contains a large number of existing properties and it would be unreasonable to deploy a blanket restriction to prevent changes or extension to all of the properties within the area. It is considered that the existing proposed policies are sufficient to protect against harmful developments and the character of the Burrows. The identification of this area is not considered to be appropriate or necessary.
012	Former Miracle Inn Site, Freshwater East Pembrokeshire Coast National Park Authority	Thatched roundhouse Tourist information/local crafts/recreation	This is an aspirational project from the Community Association without sufficient evidence to show that it can be delivered within the Plan period. It would not be appropriate to allocate land therefore. This does not preclude the proposal being considered as a planning application against the generic policies of the Plan which allow for visitor attraction proposals outside of Centre should the necessary funding and other requirements for delivery become available.
126	South of The Green, Lydstep Pembrokeshire County	Housing	This is a small site visually well contained, nestled at a low elevation with existing

	Council		<p>vegetation and the natural topography screening the site. Access to the site and the need to retain the woodland to the south and east are likely to restrict the number of units that can be accommodated on the land to below the threshold required for delivery of affordable housing.</p> <p>Previous consideration of the site for 100% affordable housing delivery by a housing association has concluded that the topography makes development unviable, although this option remains the best means of supporting the Preferred Strategy of the Plan and remains open for further exploration</p> <p>Estimated number of units - 4</p>
065	Parrog Yard, Parrog Road, Newport Newport Town Council	Housing	Site has been allocated in LDP. Site also has planning permission for 8 affordable units – currently under construction.
111	Adj Bro Dawel, Solva Pembrokeshire County Council	Housing	Currently allocated under HA384 but has not come forward for development to date. Pembrokeshire County Council (Landowner) indicates that it is hoped to secure planning permission under the current Local Development Plan, however

			<p>notwithstanding this the Council want the allocation to be retained in the replacement plan. It is stated that a replacement football pitch will not be deliverable if 100% affordable housing is required in the replacement plan.</p> <p>The level of progress demonstrated is at present insufficient to give the authority confidence in the deliverability of the site in the replacement plan. There are also sewage capacity restrictions for Solva as a whole (see No. 9).</p> <p>Due to the concerns over the deliverability of the site, it is not considered appropriate for re-allocation. The supply of housing land in Solva is limited and the approach that would best support the Plan's strategy (in the provision of affordable housing) would be to explore development of the site as an exceptional land release for the provision of 100% affordable housing</p>
114	<p>Stackpole VC School, Stackpole</p> <p>Pembrokeshire County Council</p>	Housing and Community Recreation	<p>Redevelopment of part of this site may be acceptable. Further evidence will be required to demonstrate that a proposal would not harm the setting of the Listed Building within the site. The site is no longer within an identified Centre.</p> <p>Use of the existing school field for community</p>

			recreation would be acceptable.
112	Brynhir, Tenby Pembrokeshire County Council	Housing	<p>The site is allocated in the current Local Development Plan and the suitability of the site for development is established. The landowner, however has not demonstrated a strong commitment to bringing the site forward for development to date and deliverability is uncertain. The site is considerably larger than any other allocated site in the current Local Development Plan and the number of units it can accommodate would be a significant proportion of the land supply for the National Park. The lack of security of its deliverability would undermine the strategy of the Replacement Local Development Plan.</p> <p>A planning application to develop the site for housing is currently being considered by PCNPA.</p>
113	Butts Field Car Park, Tenby Pembrokeshire County Council	Mixed use (unspecified) with car parking	<p>The site is allocated in the current Local Development Plan for residential development and the suitability of the site for development is established. Since adoption of the Local Development Plan in 2010 the landowner has advised the Authority on several occasions that it is not intending to bring this site forward for development due to displacement of the current use (car parking) and viability issues, but also that they are exploring uses for the site. There is</p>

			no certainty about delivery but as a brownfield site it should remain within the Centre boundary for Tenby but will not be allocated.
--	--	--	---

The position of the planning authority is that the rationale for not allocating/including these sites remains unchanged. The Inspector is being provided with a regular update regarding Brynhir at Tenby. The outline application is for 102 affordable dwellings, 8 shared ownership dwellings and 34 market dwellings which would provide a higher percentage of affordable housing.

The letter refers to instances where public land not being available for the planning authority to consider private land.

The planning authority would need to consider the viability of such a proposal. There are two housing market areas where the potential for 50% or more affordable housing is feasible in principle. These are the Saundersfoot and the Newport housing submarket area. In Saundersfoot more detailed viability assessments show that only less than 50% provision is feasible.

In Newport a greater than 50% affordable housing provision is feasible. However, without meaningful consultation it would be difficult to anticipate what the reaction would be to such a proposal. The reaction of the landowner would be a particular concern in terms of the deliverability issues.

More generally, in terms of principles, the Authority has not sought more than 50% in any location in the Park (save for exceptional land releases for affordable dwelling sites), given its experience of seeking higher requirements in the first Local Development Plan. The approach, which sought higher percentages in a few specific locations, was widely perceived as undeliverable and by placing such requirements on sites the National Park Authority was in effect reinforcing the perception. The Authority adopted Local Development Plan 1 at the beginning of the banking crisis and this was followed by a number of years where the rates of the development were generally low. This was combined with a negative public reaction to the affordable housing requirements of the Plan. The Authority moved on from that time with the benefit of adopting revised supplementary planning in 2014. This approach has been taken forward in Local Development Plan 2.