

Annex to Welsh Government's letter (3rd October 2012) in response to Brecon Beacons proposed Additional Focus Changes

Housing Supply & Housing Requirement	
AFC-6-1	The proposed AFC amends paragraph 6.1.1 of the deposit plan, which was previously amended by the first focussed changes. The new wording reflects the conclusions of the additional work carried out by NLP within the Assessment of Future Need for Housing Report. The findings of which conclude that the housing provision is now based on the latest WG Projections. We consider that the proposed AFC addresses our previous concerns highlighted in WG Deposit Letter Re: Housing Provision (Page 5). The new wording now reflects the guidance set out in Planning Policy Wales (PPW) (para 9.2.2)
AFC-6-2	While it is recognised that there are special characteristics of the National Park which will have an impact on the location of new development, the paragraph as reworded puts a strong emphasis on the Environmental Capacity of the Park as being a determining factor in enabling development in accordance with the special qualities of the National Park. The Welsh Government considers that the location of new development should be determined by principles of sustainability as set out in PPW, influenced by the special characteristics of the National Park, not environmental capacity.
AFC-6-5	The AFC proposes a new policy that sets out the amended housing requirement of 1990 dwellings, this is supported. However, it is not clear where this policy will be inserted within the plan; the policy also lacks an appropriate title.
AFC-6-6	The AFC to paragraph 6.1.5 of the deposit plan, which was previously amended by the first focussed changes, provides further detail on how the plan intends to deliver housing growth. It advises that the growth will be met in locations determined by community engagement and Environmental Capacity. As referred to in response to AFC-6-2, it is considered more appropriate that areas for growth are assessed on the basis of sustainability and deliverability. It is not considered that the AFC goes far enough in overcoming the Welsh Governments concerns in this regard.
AFC-6-8	<p>The AFC proposes amendments to para 6.17 of the deposit plan and the supporting table, which was previously amended by the first focussed changes. It is not clear why the figures in the table differ from table 6.1 and 6.2 of the NLP Housing Supply Assessment Report (page 15, 16). For example, new allocations within the NLP Report are 870 units, commitments plus UDP allocations are 304 units. The AFC-6-8 Table states that allocations are 989 units and commitments are 185 units. It is not clear why the figures are different from the evidence base; this is confusing and requires clarification.</p> <p>In addition AFC-6-8 states that windfalls are 638 units. The NLP Table 6.1 differentiates the proportion of small sites (473 units) within this figure. It would aid clarity if the table was amended to differentiate the small site proportion, i.e. 473 small sites, 165 windfall sites.</p>
AFC-6-9	AFC-6-9 seeks to amend policy SP5 Housing, increasing the allocation of new sites to 989 units. Please see our comments in relation to flexibility.
AFC-6-13	As stated above, Table 6.2 (NLP Housing Supply Report, Column 6) includes committed sites and UDP allocations brought forward which totals 304 units. However, the proposed table (AFC-6-13) includes five sites titled UDP

	<p>allocations which total 306 units. This suggests that 683 units are new allocated sites, 187 units less than the figure stated within the NLP Report. Why then, does column 6 of the NLP report total 304 units as this includes committed sites?</p>
	<p>In conclusion, we support the revised housing requirement and the additional clarity of the components of housing supply which is supported by evidence. We are also supportive of AFC-6-13 in respect of the additional clarity it gives in terms of total units and the affordable housing provision on allocated sites. However, it is considered that the table proposed in AFC-6-13 could be expanded further (or added as an additional table) to include the additional columns such as large site completions, unit's u/c and committed units as set out in Table 6.2 of the NLP Housing Supply Assessment Report. See WG Deposit Letter: Re: Housing Provision (Page 6), WG Focussed Change Letter re: Distribution of Housing, (page 2). Additional detail in this respect would improve the clarity of the plan.</p> <p>In addition, while there is no concern with the total number of allocations and commitments within the NLP report and the amended table within AFC-6-8 as they both total 1174 units, it is not clear why the breakdown of these figures is different from the evidence base; this is confusing and requires clarification.</p> <p>The lack of a flexibility allowance within Policy SP5 AFC-6-9 remains a key concern. Please see below comments in relation to flexibility.</p>
Affordable Housing	
There are no AFC's in relation to Affordable Housing	There are no proposed AFC's in relation to affordable housing, in particular SP6 Affordable Housing. The NLP Housing Supply Assessment Report clarifies the provision in relation to allocated sites (AFC-6-13); however, there is no indication of the estimated proportion of affordable dwellings from small and windfall sites. This requires further clarification, especially in relation to the increase in housing units by nearly 650 units (AFC-6-9).
Gypsy and Traveller Site Provision	
AFC-6-16	<p>The AFC proposes amendments to paragraph 6.5.1 of the deposit plan, which has previously been amended by the first focussed changes. The AFC provides additional detail regarding the status of the planning application, this is welcomed. In addition, the WG are content that additional work (Task 13) provided by the LPA in response to the Inspectors 2nd Exploratory Note which provides additional clarity in relation to this issue which in large, overcomes our previous concerns. See WG Deposit Letter Re: Gypsy Traveller Site Provision, (Page 7), WG Focussed Change Letter Re: FC 6.T.29 Gypsy and Traveller Site Provision.</p> <p>Whether the site is 'appropriate' will be tested as part of the examination.</p>
AFC-6-18	The Welsh Government have previously expressed concern about the wording of Policy 16 and how, as worded, criteria b of Policy 16 would have required any caravans on Gypsy and Traveller sites to be designed in local materials. The additional focussed change has sought to overcome this anomaly however the revised policy wording does not overcome this concern. The revised policy seeks

	to clarify which buildings would need to be designed as such but as written it does not specifically exclude caravans.
Waste	
There are no AFC's in relation to Waste.	The NLP Employment Land Review assesses the potential of, and identifies employment sites that may be suitable for waste facilities. The National Park Authority need to demonstrate that they have suitable potential sites available.
Employment	
AFC-7-11	<p>The AFC includes a new policy titled Employment Land Requirement. The policy identifies a requirement of 1.5 ha of additional employment land within the Park. This requirement is to be met through the development of employment and mixed use allocations for B class uses. The AFC is underpinned by the additional work contained within the NLP Employment Land Review Report which concludes there is a need for smaller scale 'start up' sites of 0.5 hectares, located within the higher tier settlements.</p> <p>The AFC is supported; the additional work is welcome and has clarified the requirement, scale, location and type of additional sites over the plan period.</p>
AFC-7-12	The AFC amends the Employment Allocations table of the deposit plan, which was previously amended by the first focussed changes. The table includes three additional allocations (1.26ha) to meet the identified requirement, these are located within Primary and Key Settlements. The additional 5ha of land available at Hirwaun (part within BBNP boundary) remains, and has been re-categorised as a commitment. The total employment allocation has been amended to 2.06 ha. The AFC is supported.
AFC-7-13	<p>The AFC amends table 7.1 Mixed Use Allocations. The table has been amended to include the 'split' of employment and residential use. This is supported and overcomes our comments as set out in WG Deposit Letter Re: Deliverability (Page 8)</p> <p>NLP Employment Land Review Report (page 123) recommends the de-allocation of Land Adjoining to Defynnog Road. The site has major constraints described as 'poor' in relation to its suitability for employment use. Page 100 para 8.2 of the report and Appendix 2 highlight major constraints relating to steep topography, 'bad neighbour uses, major access constraints which may render the site unviable. It is noted from the AFC that the site has not been de-allocated. The rationale for retaining the site in respect of its constraints needs to be justified. In addition, unlike the other sites within the table, there is no indication of the proportion of uses expected to be delivered within the 1.43 ha. Appendix 2 states that retail will be considered on the site and housing is not suitable. This should be stated within the policy in order to aid clarity and the development management functions.</p>
AFC-7-16	The AFC makes revision to the wording of Policy 19. The criteria against which development would be considered do not include safeguards to the amenity of any residential occupiers.

AFC-7-17	The AFC amends Policy 17 'Live Work Facilities', however the policy separates the uses to include B1, b2 and B8. This seems to have the same aim as Policy 19. It must therefore be questionable whether the two policies are required. In addition, Policy 19 does not include reference to protecting the amenity of neighbours.
AFC-7-21	Policy 18, has been amended but no requirement is included as to when the marketing will need to have been undertaken. This could result in marketing being undertaken a significant time before the submission of an application. In order to be relevant it should be undertaken for the 12 months prior to the submission of the application. An indication of how proposals would be considered under the 'cascade approach' should be provided. The policy as worded does not provide a clear indication of what types of development are likely to be considered acceptable.
Deliverability & Flexibility	
Various AFC's in relation to DCWW Comments	Many of the changes relate to updated evidence from Welsh Water in relation to the infrastructure constraints of settlements and sites. However, it remains to be case that the largest proportion of housing is unlikely to be delivered before the last five years of plan. The additional evidence suggests that sewerage infrastructure remains to be a major constraint with no indication of when the required works will be undertaken, by whom, how much the works will cost and whether the additional work required would have an adverse impact on the viability of the development. A clear understanding of all the constraints impacting on a particular development needs to be had to determine deliverability and viability.
AFC-6-8	AFC-6-8 states that 184 units (46pa) have been completed in the period 2007-2011. This leaves 1812 units (165pa) to be built in the remaining 11 years of the plan period. Given the required rise in completions, it is imperative that upon adoption, the plan is able to demonstrate that it has a five year supply of housing. (PPW, para 9.2.3).
AFC-6-9	<p>The revised Housing Policy SP5 (AFC-6-9) does not include a flexibility allowance. This remains to be a key concern; the plan should ensure that a range and choice of sites can be brought forward within the plan period in order to ensure that the plan is sufficiently flexible to respond to economic changes, and unforeseen circumstances. (See WG Focussed Change Letter Re: Flexibility, page 2). In light of the infrastructure constraints and low levels of completions in the first four years of the plan period, the lack of flexibility within the Plan could potentially impact on the deliverability of the Strategy, in particular the delivery of private and affordable housing.</p> <p>A 10% flexibility allowance on the housing allocation figure of 1990 would require an additional 200 units. Consideration should be given to identifying further sites to add a degree of flexibility. The National Park Authority should be able to identify such sites through the extensive assessment of all potential sites considered for inclusion in the Plan.</p>

	<p>In addition, there appears to be additional 'windfall' potential in terms of the Powys County Council school closure programme which could result in several sites coming to the market for alternative use, most likely for residential use. (NLP Housing Supply Report, page 12). The report describes the windfall allowance as 'quite conservative'. Whilst the decision on school closures has already been made the sites have not yet been brought to the market. The potential of these sites and whether they will come forward within the plan period should be clarified. This could aid the flexibility of the plan.</p>
<p>Points for Clarification</p>	
<p>AFC-7-20</p>	<p>It would be beneficial if new paragraphs and policies were provided with a number for ease of reference. An explanation of what a 'cascade approach' is should be provided. The paragraph has been amended but no explanation of the cascade approach has been provided.</p>
<p>AFC-A-15</p>	<p>The AFC refers to DVR-LBD-A, however there is no reference to DVR-LBD-A in the deposit plan or first focussed changes.</p>
<p>AFC-A-19</p>	<p>It is unclear why the suggested additional focussed change is shown in double strike through.</p>