



Martina Dunne
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15 February 2019

Dear Martina,

Pembrokeshire Coast National Park Authority – Replacement Local Development Plan – Focussed Changes Consultation: Welsh Government Response

Thank you for consulting the Welsh Government regarding Pembrokeshire Coast National Park Authority's Replacement Local Development Plan (LDP2) proposed Focussed Changes.

The matter of whether a plan is considered 'sound' will be for the appointed Planning Inspector to determine. The proposed Focussed Changes have been considered in light of the representations made to the Deposit Plan on 23 May 2018, in accordance with the tests of soundness. The attached **Annex** provides a detailed response on whether the Schedule of Proposed Focussed Changes meets the matters raised in our deposit representations. The annex sets out where and why our objections are maintained and, if the Inspector considers it appropriate, they can be addressed through the hearing sessions.

Since the Deposit Plan consultation Planning Policy Wales (PPW) Edition 10 has been published. The authority will need to consider if there are any implications for the plan. As set out in the attached Annex, there are a number of **inconsistencies between the Proposed Focussed Changes document and the updated Housing Background Paper** (November 2018), relating to the housing requirement and the components of housing supply. **In addition, the Focussed Changes do not address many of Welsh Government's Deposit Representations relating to the spatial distribution of housing, Gypsy and Travellers, Minerals and Renewable Energy.** Welsh Government officials will continue to work with The Park officers to try and resolve any outstanding issues prior to the examination.

Without prejudice to the Minister's powers to intervene in the process and the independent examination, the Welsh Government is committed to helping Local Planning Authorities throughout the LDP process.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'M Newey', with a long horizontal stroke extending to the right.

Mark Newey
Head of Plans Branch
Planning Directorate

Annex

Annex to Welsh Government’s Letter (15 February 2019) in response to Pembrokeshire Coast National Park Authority’s proposed Schedule of Focussed Changes

FC No.	Welsh Government comment																				
Key diagram																					
FC01 FC03	Focussed Changes (FC01 and FC03) propose to place the ‘key diagram’ in the Proposals Maps document, rather than the plan (written statement). The LDP Manual (edition 2, p15 and draft edition 3, p20) both clearly state <u>the plan</u> should contain a ‘key diagram’ as a diagrammatic map to spatially articulate the key elements of the strategy. This needs to be corrected.																				
Welsh Language																					
FC06 Objection maintained	<p>FC06 inserts a list of Welsh Language Sensitive Areas (WLSAs) into paragraph 4.80 of the plan. We do not support this change. As stated in our Deposit representation (Cat C, page 5) WLSAs should be listed <u>within Policy 14</u> to clearly articulate which settlements are classified within WLSAs.</p> <p>The text in paragraph 4.80 states “the policy will normally apply in Community and Town Council areas with 19.2% of more Welsh speaking population”. The authority need to clarify what “normally apply” means in practice?</p>																				
Housing – Components of land supply																					
FC15 Objection maintained	<p>Our Deposit representation (Cat B, page 3) identified a number of issues and inconsistencies in the components of housing land supply which remain in the Focussed Changes document and require addressing.</p> <p>The Focussed Changes amends the table of ‘Components of Housing Land Supply (Table 5). The Housing Background Paper has also been updated (November 2018). There are several inaccuracies between the two. The table below summarises these discrepancies which must be addressed.</p> <table border="1"> <thead> <tr> <th></th> <th>Deposit Plan (May 2018)</th> <th colspan="3">Proposed Focussed Changes (Dec 2018)</th> </tr> <tr> <th></th> <th>Table 5</th> <th>Table 5 (FC15)</th> <th>Housing Background Paper – Appendix 3 Trajectory (updated Nov 2018)</th> <th>Housing Background Paper - Appendix 2 (updated Nov 2018)</th> </tr> </thead> <tbody> <tr> <td>Row A Total completions</td> <td>46</td> <td>154</td> <td>176</td> <td></td> </tr> <tr> <td>Row C Units</td> <td>149</td> <td>147</td> <td>166</td> <td>169</td> </tr> </tbody> </table>		Deposit Plan (May 2018)	Proposed Focussed Changes (Dec 2018)				Table 5	Table 5 (FC15)	Housing Background Paper – Appendix 3 Trajectory (updated Nov 2018)	Housing Background Paper - Appendix 2 (updated Nov 2018)	Row A Total completions	46	154	176		Row C Units	149	147	166	169
	Deposit Plan (May 2018)	Proposed Focussed Changes (Dec 2018)																			
	Table 5	Table 5 (FC15)	Housing Background Paper – Appendix 3 Trajectory (updated Nov 2018)	Housing Background Paper - Appendix 2 (updated Nov 2018)																	
Row A Total completions	46	154	176																		
Row C Units	149	147	166	169																	

with planning permission				
Row D Allocations	502	389	367	367
Row E large windfalls	132	177	180	177
Row F small windfalls	318	283	286	283
Total provision	1147	1150	1175	

Row A – Total completions

There is a substantial discrepancy between the Focussed Changes document (Table 5) and the updated Housing Background Paper (Appendix 3) during the first three years of the plan period. Accurate figures must be provided, in line with the Joint Housing Land Availability Study (JHLAS).

Row C - Units with planning permission

The number of units with planning permission (base date April 2018) requires clarification.

Row D - Allocations

The allocated housing total needs to be clarified. This should be supported by robust evidence on delivery and phasing.

Rows E and F - Windfall allowance

The small and large windfalls components need to be clarified.

Total provision and Flexibility

The plan makes provision for 1,150 units to deliver 960 homes, which remains unchanged from the Deposit plan. This equates to a 20% flexibility allowance to account for non-delivery and unforeseen issues. The evidence in the Housing Background Paper (paragraph 96) refers to a flexibility allowance of 15%. This discrepancy needs to be rectified.

Housing Trajectory (Housing Background Paper, Appendix 3 Land Availability)

The housing trajectory should be based on the phasing and build rates on an annual basis for the entire plan period. At present it appears to include a 'flat rate' for the delivery of commitments, landbank sites and allocations in 3 to 5 year tranches, rather than annually. It remains unclear as to how sites have been assessed in terms of phasing across the plan period, which needs to be rectified.

The housing trajectory must be embedded in the plan as an appendix to inform the monitoring framework. **All components of the housing provision need to be accurate before the plan can be adopted.**

Policy 48 Housing Allocations

FC16 The Deposit plan appeared to include units on the 16 allocations which were delivered beyond the plan period which is inappropriate.

Objection partially addressed	<p>Focussed Change (FC16) reduces the number of units delivered on housing allocations (Policy 48) over the plan period from 525 to 479. The reduction of 46 units is due to the removal of units that would be delivered beyond the plan period which we support.</p> <p>However, as highlighted in the Housing Component table above, the number of units on allocated sites does not equate to 479 dwellings. This needs to be rectified, based on robust phasing assumptions across the whole plan period.</p>
FC 02 FC14 FC17	<p>Future growth areas</p> <p>The plan should only contain allocations which are deliverable within the plan period, not 'future growth areas'.</p>
Objection addressed	<p>We support the removal of 'future growth areas' which addresses our Deposit representation in this respect.</p>
Affordable housing	
FC15	<p>Our Deposit representation (Cat B, page 3) highlighted inaccuracies and inconsistencies in the housing figures which remain unaddressed in respect of affordable housing. FC15 states the plan can deliver 359 affordable homes but this figure does not align with the target of 250 units.</p>
Objection maintained	
FC21	<p>FC21 inserts the plan target of 250 affordable homes in the reasoned justification (paragraph 4.291). The target needs to be in Policy 49.</p>
Objection maintained	
FC21	<p>FC21 identifies a plan target of 250 affordable homes linked to the plans housing provision. The target should be based on the housing requirement of 960 units, not the provision. As worded, it is unclear if this is the case.</p>
New objection	
FC22	<p>FC22 introduces affordable housing targets for each sub-market area in Policy 49. This change is supported.</p>
Objection addressed	
FC16 FC23	<p>The Affordable Housing Viability Study had not costed the impact of sprinklers at £3,100 per dwelling. The updated Housing Background Paper (Appendix 4, November 2018) has now included the cost impact of sprinklers in sub-market areas and site specific allocations. We support this update to the viability work.</p>
Objection partially addressed	<p>Some of the affordable housing targets have been amended with separate targets on allocations and in sub-market areas. Whilst we do not disagree with the principle of this split approach it will be for the LPA to explain.</p>
FC23	<p>The thresholds at which the targets will apply have also been amended. We understand this is based on the ability to deliver 1 affordable unit on site and not whether the threshold is viable. This approach will be for the LPA to explain.</p>
New objection	