
Adroddiad ar gyd-astudiaethau argaeledd tir ar gyfer tai

gan P J Davies BSc(Hons) MA MRTPI
Arolygydd a benodir gan Weinidogion Cymru
Dyddiad: 15/12/2014

Report on Joint Housing Land Availability Study

by P J Davies BSc(Hons) MA MRTPI
an Inspector appointed by the Welsh Ministers
Date: 15/12/2014

Ref: JHLAS/14/L9503/516008

Local Planning Authority: Pembrokeshire Coast National Park Authority

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- This report concerns the Pembrokeshire Coast National Park Authority Joint Housing Land Availability Study (JHLAS) 2014.
 - The matters in dispute are set out in the JHLAS Statement of Common Ground (SoCG) submitted to the Welsh Government in September 2014.
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Recommendation

1. That the 2014 JHLAS housing land supply figure for the Pembrokeshire Coast National Park Authority area be determined as 2.6 years.

Context of the Recommendation

2. Local Planning Authorities have a duty to ensure that sufficient land is genuinely available or will become available to provide a 5-year supply of land for housing¹. The purpose of preparing a JHLAS is to:
 - Monitor the provision of market and affordable housing;
 - Provide an agreed statement of residential land availability for development planning and control purposes; and
 - Set out the need for action in situations where an insufficient supply is identified².
3. The scope of this report is to recommend an appropriate housing land supply figure in respect of the Pembrokeshire Coast National Park Authority (NPA) area, in the light of the matters in dispute concerning the calculation of such a figure and the available evidence.

Main Issue

4. This is whether or not each of the disputed sites should count towards the 5 year land supply at the time of the base date of the study.

¹ PPW Edition 7 paragraph 9.2.3

² TAN 1: Joint Housing Land Availability Studies (June 2006) paragraph 2.1

Reasons

5. The agreed number of units in the land supply (including small sites) constitutes 427 units. There are 7 disputed sites, representing a potential supply of 98 units, of which 72 are in dispute. TAN 1 provides advice on the criteria to be applied in considering whether sites may be regarded as genuinely available within a five year period. The TAN also provides advice on sites that have remained in the land supply for periods well in excess of five years. I have considered the disputed site on the available evidence and in line with the advice in the TAN and the Welsh Government (WG) Guidance on the JHLAS process. I have also had regard to WG's clarification letter dated 7 November 2013.
6. Opposite Manorbier VC School (HA848) (3 units in dispute): This site is allocated in the LDP for a total of 19 units. The NPA forecast indicates delivery of three units per annum in years 3 to 5 of the study period. The landowner is actively marketing the site, and a Housing Association is engaged in pre-application work with the NPA. HBF note that the requirement for extensive offsite sewer provision may involve works on third party land, and argue that this constitutes a reason to shift the NPA's forecast back by a year, pushing 3 of the expected 9 units into category 3i. However, there is no specific evidence before me as to the likelihood of delays to the NPA's forecast and I find that the 3 disputed units should be included in the 5 year land supply.
7. Rear of Cross Park, New Hedges (HA813) (5 units in dispute): This site has been in the land supply since 2010 and is allocated in the LDP for 30 units. The NPA anticipates that 20 units will come forward during the study period. The HBF consider that a realistic delivery rate is 15 units. In the 2013 study, it was found that despite the landowner's stated intention to sell the site, no material change in circumstance had occurred which would support the NPA's forecast, and that therefore the contribution to the supply should remain at lower rate found in previous JHLASs. Although the landowner instructed agents to submit an outline planning application in May 2014, this post-dates the base date of this year's study period. The HBF forecast represents an increase on the expected delivery within the study period compared to previous JHLASs. I therefore find that none of these 5 disputed units should be included in the 5 year land supply.
8. Land adj Ridgeway & Incline, Saundersfoot (NP/033/91) (4 units in dispute): This site has an extant planning permission which includes one uncompleted unit. The NPA propose the inclusion of further units on the basis that an outline permission for 8 further units was previously associated with the site, before lapsing. The NPA state that the landowner intends to submit an application and therefore propose including 5 units in the land supply with a further 4 in category 3i. However, at the base date of this study period only one unit on this site satisfied the criteria in paragraph 7.1.2 of TAN 1. I therefore find that none of the 4 disputed units should be counted towards the 5 year land supply figure.
9. Bank House, Whitchurch Lane, Solva (HA792) (8 units in dispute): the landowner intends to develop the site in the short to medium term, and the NPA therefore propose inclusion of 12 units in the land supply. However, the sewerage constraints on this site cannot be overcome until upgrading of the Solva Sewage Treatment Works by Dŵr Cymru/Welsh Water is completed. At the time of last year's JHLAS this was expected to be by March 2015. Dŵr Cymru now state that this completion date will not be met, and they are unable to offer a revised date. Given this significant constraint to development, I find that HBF's forecast with 8 of the 12 units placed in

category 3i to be appropriate. I therefore find that none of the 8 disputed units should be counted towards the 5 year land supply figure.

10. West of Glasfryn Road, St. David's (HA737) (30 units in dispute): This site is allocated for 90 units in the adopted LDP. In previous years all units were classified as category 3i. The landowner has now started to bring development forward, prompting the NPA to move 30 units into the land supply for this year's study. Whilst it appears that access to the site will not be complete until Pembrokeshire County Council are able to secure funding, and that works are not expected until 2015, the NPA maintain that their forecast is accurate, and accounts for the constraint. In the absence of any specific information as to why a forecast of first completions in 2017/18 is unrealistic, I find no reason alter the NPA's forecast. I therefore find that these 30 disputed units should be counted towards the 5 year land supply figure.
11. Land North of Burgage Green Close, St. Ishmael's (NP/08/60) (2 units in dispute): This site is not an allocated LDP site and does not benefit from planning permission for any more units than the two already completed on site. Despite landowner engagement in pre-application discussions with the NPA, the site does not meet the criteria for sites suitable for inclusion in a JHLAS given in paragraph 7.1.2 of TAN 1. I therefore find that none of these disputed units should be counted towards the five year land supply figure.
12. Brynhir, Tenby (NP/259/89 HA377) (20 units in dispute): The NPA indicate that progress is being made on discussions with Pembrokeshire County Council, the landowners, as to a revised affordable housing requirement for the site. However, the comments from Pembrokeshire County Council in the SoCG also indicate that the high cost of initial infrastructure investment makes delivery of units on site problematic. In the absence of a firm indication of landowner / developer intention to deliver during the study period, and the fact that significant road improvements are required to enable delivery, I do not find it appropriate to move any units on this site out of category 3i at the base date of this study period. I therefore find that none of the 20 disputed units should be counted towards the 5 year land supply figure.

Conclusion

13. For the above reasons, I find that of the 72 disputed units, 33 should be included in the 5 year land supply figure. Combined with the agreed figure of 427 units, this brings the total land supply figure to 460 units.
14. Using the agreed residual method, and based on the agreed average annual completion of 178 units, I conclude that, as at 1 April 2014, the housing land supply for the Pembrokeshire Coast National Park Authority planning area is 2.6 years.

P J Davies

INSPECTOR