Pembrokeshire Coast National Park Authority Joint Housing Land Availability Study 2013 Statement of Common Ground

BETWEEN THE PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY AND THE HOMEBUILDERS FEDERATION (plus PEMBROKESHIRE COUNTY COUNCIL, PEMBROKESHIRE HOUSING ASSOCIATION, CANTREF HOUSING ASSOCIATION & DWR CYMRU)



September 2013

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1.0 INTRODUCTION

- 1.1 This is a Statement of Common Ground prepared by the Pembrokeshire Coast National Park Authority, the HBF, (plus Pembrokeshire County Council, Pembrokeshire Housing Association, Cantref Housing Association and Dwr Cymru) for 2013.
- 1.2 This Statement of Common Ground follows the process set out in the agreed delivery timetable for the preparation of Pembrokeshire Coast National Park Authority JHLAS for 2013 and has been prepared in accordance with the requirements of Planning Policy Wales, Technical Advice Note1, Joint Housing Land Availability Studies, (TAN 1) and the JHLAS Guidance Note (August 2012).
- 1.3 This SoCG has been prepared to assist the Planning Inspectorate to make a recommendation to the Welsh Government on housing land supply for the Pembrokeshire Coast National Park Authority for 2013.

2.0 AGREED MATTERS

5 Year Land Supply Sites

- 2.1 The Pembrokeshire Coast National Park Authority published the site schedules and site proformas for 2013 for public consulation between 5th July 2013 and the 26th July 2013. Responses were received from Pembrokeshire County Council and The Homebuilders Federation. Further to this the proformas were recirculated with Officer responses from this Authority along with updated information relating to some of the sites between Friday 13th September and Friday 20th September 2013. As a result of this some disputes with the HBF were resolved and are listed in Appendix 3. Pembrokeshire County Council wished their intial comments to stand.
- 2.2 The proposed site schedules of agreed and disputed sites are provided at Appendix 1. The individual site proformas are provided at Appendix 2.

Large and Small Site Completions

Completions 31 st March	Large Site	Small site
(2011 – 1 st April 2013)	Completions	Completions
35	19	16

Method of Calculation

2.3 The Pembrokeshire Coast National Park Authority confirm that it is their intention to calculate the housing land supply within their area by using the residual method set out in TAN 1.

3.0 MATTERS OF DISPUTE

5 Year Land Supply Sites

- 3.1 It has not been possible to agree the details relating to 16 housing sites. These sites total 170 dwellings within the 5 year period and equate to 1.05 years of supply.
- 3.2 Following the consultation on site schedules and site proformas, the following details are disputed by the HBF and/or Pembrokeshire County Council and Pembrokeshire Coast National Park Authority.

BROAD HAVEN

Site Ref: HA 734

South of Driftwood Close

Comp 0 UC 0 NS 8 Y1 0 Y2 2 Y3 2 Y4 2 Y5 2 0 units in 3i

Landowner/Developer Intentions

Land owner confirmed desire to submit and outline planning application in first half of 2013 in response to survey undertaken as part of Land Implementation Study (March 2013).

Developer/Landowner/Agent Details

Mr Llewellyn (Owner)

Planning Status

Allocated in the LDP for 8 units, 4 to be affordable housing. Phased for development 2012-17 **Site Constraints**

No known constraints. Offsite sewer provision will be required.

First Year in 5 Year Housing Land Supply

2010

Consultation Response

PCC response: PCC suggests that the site should be moved into the 3i category until an outline application is submitted, unless the recently completed deliverability study suggest otherwise.

NPA Position

The landowner responded to a survey as part of the Land Implementation Study above which provides the most up-to-date information. The landowner has recently been in contact with the Authority regarding the affordable housing contribution at this site. We have no evidence contrary to that given by the landowner and consider the NPA forecast is reasonable.

No change is suggested.

DALE

Site Ref: HA382 Castle Way

Comp 0 UC 0 NS 12 Y1 0 Y2 0 Y3 0 Y4 0 Y5 4

8 units in 3i

Landowner/Developer Intentions

Landowner contacted in March 2013 as part of Land Implementation Study. Has stated no intention to develop the site in the foreseeable future unless the affordable housing requirement is reduced.

Developer/Landowner/Agent Details

Dale Castle Estate (Owner)

Planning Status

Allocated in the LDP for 12 units, 10 to be affordable housing. Allocated in preceeding JUDP and Local Plan.

Site Constraints

No known constraints

First Year in 5 Year Housing Land Supply

1999

Consultation Response

PCC Response: Site should be in 3i due to the Developer's intention for the site or unless there are proposals in place to renegotiate the affordable housing contribution.

HBF Response: This site was first recorded in the schedule in 1999 and it has still not been developed. The site has therefore been in the supply for more than 14 years, which is clearly contrary to the TAN. In addition to this, the landowner has stated no intention to develop the site in the foreseeable future unless the affordable housing requirement is reduced.

This site should clearly be in 3(i).

The need to ensure sites are deliverable and genuinely available is particularly pertinent, considering the Minister's recent statement as mentioned above.

NPA Position

Policy 45 of the Local Development Plan and supporting guidance allows for negotiation of the affordable housing contribution where proposals are shown to be unviable. Officers anticipate that one of the outcomes of the current affordable housing Scrutiny Review Committee being carried out by the National Park Authority will be to re-run the Three Dragons Toolkit for sites allocated in the Plan, taking account of any increases in costs since the LDP was adopted. The product of this exercise will be communicated to the relevant landowners and developers in this financial year. The intention is to assist in bringing forward allocated sites in the Local Development Plan.

However, given the lack of interest from the landowner in bringing this site forward for development at the present time it is agreed to put back the forecast to the end of the 5 year period to allow for discussions to take place.

Proposed change: Yr3 0; Yr4 0; Yr5 4 and 8 units in 3i.

HERBRANDSTON

Site Ref: NP/04/462

Site of former Sir Benfro Hotel

Comp 0 UC 5 NS 23 Y1 6 Y2 6 Y3 6 Y4 5 Y5 0

0 units in 3i

Landowner/Developer Intentions

Development commenced on this site but no recent activity on site. Company still operating but may be affecting by development of large site being developed by Persimmon nearby in Milford Haven. Developer contacted June 2013 re intentions for site, but no response to date.

Developer/Landowner/Agent Details

Max Thomas Developments.

Planning Status

Permission 07/344 for 28 units, 6 to be affordable

Site Constraints

None known.

First Year in 5 Year Housing Land Supply

2004

Consultation Response

HBF response: This site has been around since 2004 and despite an extant permission, there has been no activity to date. The previous comments on this site stated that viability is an issue. The delivery of the site is also affected by the Persimmon site in Milford Haven.

We made these comments last year and the year before and we cannot keep giving sites the benefit of the doubt, when there is no clear evidence that the site will be developed over the next 5 years. The need to ensure sites are deliverable and genuinely available is particularly pertinent, considering the Minister's recent statement as mentioned above.

In light of the above, the site should be moved to 3(i).

NPA Position

The has been activity on this site (see above) with commencement recorded in the 2012 JHLAS. Five units are currently partly constructed on site although there has been no recent activity. The developer remains in business.

No change is suggested.

JAMESTON

Site Ref: HA730

Opposite Bush Terrace Comp 0 UC 0 NS 35 Y1 0 Y2 0 Y3 0 Y4 0 Y5 8

27 units in 3i

Landowner/Developer Intentions

Landowner was contacted as part of Land Implementation Study (March 2013). She is waiting on the sale of plots on site HA436 (Land north of Landway Farm) prior to progressing work on this site.

Developer/Landowner/Agent Details

Mrs Sally Thomas

Planning Status

Allocation in the LDP for 35 residential units, 18 to be affordable housing. Phased for development 2012-17 (20 units) and 2018-21 (15 units).

Site Constraints

Development may require upgrading Sewage treatment works. This may delay development to after 2015. The phasing in the LDP reflects this.

First Year in 5 Year Housing Land Supply

2010

Consultation Response

HBF response: We reiterate our comments on this site from the last 2 years. The notes say this has been allocated in the LDP for 35 units with 18 to be affordable housing. We believe this would impact significantly on development viability and therefore would make the delivery of this site extremely difficult. This is compounded by the fact that there is no developer on board and the land owner is waiting to sell separate plots before the site can be developed. Also the notes state that development may reauire upgrading sewage treatment works, which could delay development to after 2015. This adds further uncertainty and would incur additional cost. As such, this site should be moved to 3(i), until we have proof that a developer is on board and intends to develop.

The need to ensure sites are deliverable and genuinely available is particularly pertinent, considering the Minister's recent statement as mentioned above.

NPA Position

Further contact has been made with the land owner who advises that given the latest position in relation to the sewerage system having capacity to accommodate this development, it is intended to bring the site forward for development within the next 4 years. In light of this information it is suggested that the forecast is moved back to the end of the 5 year period and beyond.

Proposed change: Yr4 0; 3i 27

LAWRENNNY

Site Ref: HA559

Adjacent Home Farm

Comp 0 UC 0 NS 30

Y1 0 Y2 0 Y3 5 Y4 5 Y5 5

15 units in 3i

Landowner/Developer Intentions

Landowner has concerns about providing 50% affordable housing.

Developer/Landowner/Agent Details

Mr David Lort-Phillips

Planning Status

Allocation in the LDP for 30 residential units, 15 to be affordable housing. Phased for development 2007-11 (15 units) and 2012-17 (15 units).

Site Constraints

No known constraints

First Year in 5 Year Housing Land Supply

2010

Consultation Response

HBF response: We stated last year that this site would not be developed because of the overly onerous affordable housing target. This has now been confirmed by the land owner. The site should be moved to 3(i) as there are clear viability issues (and crucially) there is absolutely no evidence to demonstrate that the site will be delivered in the next 5 years.

The need to ensure sites are deliverable and

NPA Position

Policy 45 of the Local Development Plan and supporting guidance allows for negotiation of the affordable housing contribution where proposals are shown to be unviable. Officers anticipate that one of the outcomes of the current affordable housing Scrutiny Review Committee being carried out by the National Park Authority will be to re-run the Three Dragons Toolkit for sites allocated in the Plan, taking account of any increases in costs since the LDP was adopted. The product of

genuinely available is particularly pertinent, considering the Minister's recent statement as mentioned above.

this exercise will be communicated to the relevant landowners and developers in this financial year. The intention is to assist in bringing forward allocated sites in the Local Development Plan.

No change is suggested.

MANORBIER STATION

Site Ref: HA848

Opp Manorbier VC School Comp 0 UC 0 NS 19 Y1 0 Y2 0 Y3 3 Y4 3 Y5 3

10 units in 3i

Landowner/Developer Intentions

Landowner contacted as part of the Land Implementation Study (March 2013). Wishes to sell land for development.

Developer/Landowner/Agent Details

Planning Status

Allocation in the LDP for 19 residential units, 10 to be affordable housing. Phased for development 2012-17 (9 units) and 2018-21 (10 units).

Site Constraints

There are no public sewers in the vicinity of this proposed development. Extensive offsite sewer provision is required but foul flows can be treated at Tenby West Treatment Works.

First Year in 5 Year Housing Land Supply 2010

Consultation Response

HBF response: We reiterate our comments from last year and the year before on this site. The notes say this has been allocated in the LDP for 19 units with 10 to be affordable housing. We believe this would impact significantly on development viability and therefore would make the delivery of this site extremely difficult. Also the notes state that development may require upgrading sewage treatment works. which could delay development to after 2015. This adds further uncertainty and would incur additional cost. The notes also state that the land owner wishes to sell the site but is not marketing the site and has not found a suitable developer.

In light of the above, this site should be moved to 3(i), until we have proof that a developer is on board and intends to develop.

The need to ensure sites are deliverable and genuinely available is particularly pertinent, considering the Minister's recent statement as mentioned above.

NPA Position

The land is being marketed by Guy Thomas Estate Agents.

Policy 45 of the Local Development Plan and supporting guidance allows for negotiation of the affordable housing contribution where proposals are shown to be unviable. Officers anticipate that one of the outcomes of the current affordable housing Scrutiny Review Committee being carried out by the National Park Authority will be to re-run the Three Dragons Toolkit for sites allocated in the Plan, taking account of any increases in costs since the LDP was adopted. The product of this exercise will be communicated to the relevant landowners and developers in this financial year. The intention is to assist in bringing forward allocated sites in the Local Development Plan.

Recent contact with landowners who have advised that they will shortly be submitting a planning application.

No change is suggested.

Site Ref: MA895

Land part of Buttylands

Comp **0** UC **0** NS **15**

Y1 0 Y2 0 Y3 0 Y4 0 Y5 3

12 units in 3i

Landowner/Developer Intentions

Pre-application enquiry made in January 2013. Landowner contacted as part of Land Implementation Study (March 2013). Currently considering how to proceed as land currently used as caravan park.

Developer/Landowner/Agent Details

Curtis Blain (Agent)

Planning Status

Mixed allocation in the LDP for 15 residential units, 8 to be affordable housing, and educational facility. Phased for development 2012-17 (8 units) and 2018-21 (7 units).

Site Constraints

Tenby West Waste Water Treatment Works is able to accommodate foul flows from this site but public sewer is approximately 1km from the site.

First Year in 5 Year Housing Land Supply

2010

Consultation Response

HBF response: We reiterate our comments from last year and the year before on this site. The notes say this has been allocated in the LDP for 15 residential units, 8 to be affordable housing, and educational facility. We believe this level of planning obligations could impact severely on development viability. Also the notes state development may require upgrading sewage treatment works. which could development to after 2015. This adds further uncertainty and would incur additional cost. The land owner also states he is considering how to move forward as the site is currently used as a caravan park! As such, this site should be moved to 3(i), until we have proof that a developer is on board and intends to develop.

The need to ensure sites are deliverable and genuinely available is particularly pertinent, considering the Minister's recent statement as mentioned above.

NPA Position

Policy 45 of the Local Development Plan and supporting guidance allows for negotiation of the affordable housing contribution where proposals are shown to be unviable. Officers anticipate that one of the outcomes of the current affordable housing Scrutiny Review Committee being carried out by the National Park Authority will be to re-run the Three Dragons Toolkit for sites allocated in the Plan, taking account of any increases in costs since the LDP was adopted. The product of this exercise will be communicated to the relevant landowners and developers in this financial year. The intention is to assist in bringing forward allocated sites in the Local Development Plan.

However given constraints linked to sewers and the need to consider the existing use it is suggested that the forecast is moved to the end of 5 year period and beyond.

Proposed change: Yr 3: 0; Yr 4 0; 3i 12

NEW HEDGES

Site Ref: HA813 **Rear of Cross Park** Comp **0** UC **0** NS **30** Y1 **0** Y2 **5** Y3 **5** Y4 **5** Y5 **5**

10 units in 3i

Landowner/Developer Intentions

Landowner contacted as part of Land Implementation Study (March 2013). Site currently being progressed with intention to submit outline application later this year and to sell the site.

Developer/Landowner/Agent Details

Mr David Lewis

Planning Status

Mixed allocation in the LDP for 30 residential units, 18 to be affordable housing. Phased for development 2012-17 (15 units) and 2018-21 (15 units).

Site Constraints

First Year in 5 Year Housing Land Supply

2010

Consultation Response

HBF response: The notes state that there is an intention to submit outline application later this year and to sell the site. However, given the level of affordable housing on this site, we believe it would not be commercially viable to develop. We made these comments last year and the year before and therefore, we believe that until there is a developer on board, to demonstrate the site is deliverable, the site should be moved to 3(i).

The need to ensure sites are deliverable and genuinely available is particularly pertinent, considering the Minister's recent statement as mentioned above.

NPA Position

Policy 45 of the Local Development Plan and supporting guidance allows for negotiation of the affordable housing contribution where proposals are shown to be unviable. Officers anticipate that one of the outcomes of the current affordable housing Scrutiny Review Committee being carried out by the National Park Authority will be to re-run the Three Dragons Toolkit for sites allocated in the Plan, taking account of any increases in costs since the LDP was adopted. The product of this exercise will be communicated to the relevant landowners and developers in this financial year. The intention is to assist in bringing forward allocated sites in the Local Development Plan.

No change is proposed.

NEWPORT

Site Ref: NP/06/106
The Newport Pottery
Comp 0 UC 0 NS 6
Y1 0 Y2 0 Y3 0 Y4 0 Y5 6
0 units in 3i

Landowner/Developer Intentions

Site is for sale (http://www.rightmove.co.uk/property-for-sale/property-33589436.html,

Developer/Landowner/Agent Details

Planning Status

Permission granted in 2009 (NP/06/106) for 6 units two to be affordable.

Site Constraints

No known constraints

First Year in 5 Year Housing Land Supply

2009

Consultation Response

HBF response: This site is currently for sale and we believe the permission has now expired. When a new permission is required the site will require 70% affordable housing, which will clearly destroy any chance of development.

The site should be removed from the schedule as it does not have permission.

NPA Position

Permission for the site has not expired. Landowner recently in contact with the Authority to explore options for developing the site. Tai Cantref Housing Association considering further approach to the landowner.

Agree that the forecast should be moved to the end of the 5-year period.

Proposed change: Yr1 0; Yr2 0; Yr5 6

SAUNDERSFOOT

Site Ref: NP/033/91

Land adj Rigeway & Incline

Comp **11** UC **0** NS **9** Y1 **1** Y2 **0** Y3 **2** Y4 **3** Y5 **3**

0 units in 3i

Landowner/Developer Intentions

Site owned/ developed by small builder/developer. No recent activity on site. Landowner has approached NPA to discuss future development of remaining area of this site (May 2013).

Developer/Landowner/Agent Details

AJ Collins

Planning Status

Permission NP/06/0343 extant for plot 12 – last remaining plot with reserved matters permission. Outline permission for plots 13 to 20 lapsed.

Site Constraints

None known

First Year in 5 Year Housing Land Supply

1991

Consultation Response

HBF response: 8 of these plots do not have planning permission and therefore the site does not have a valid permission. The site should be removed from the schedule.

NPA Position

August 2013 – pre-application enquiry received relating to developing the remainder of the site and affordable housing provision.

No change is suggested.

SOLVA

Site Ref: HA384

Adj Bro Dawel

Comp 0 UC 0 NS 18

Y1 0 Y2 0 Y3 6 Y4 6 Y5 6

0 units in 3i

Landowner/Developer Intentions

Landowner was contacted as part of the Land Implementation Study (March 2013). Has advised that following upgrades to sewerage system programmed by Dwr Cymru by March 2015 that will seek to dispose of the site for development.

Developer/Landowner/Agent Details

Pembrokeshire County Council.

Planning Status

Allocation in the LDP for 18 residential units, 9 to be affordable housing. Phased for development 2012-17.

Site Constraints

Solva Sewage Treatment Works is currently operating at capacity and requires improvements. These are programmed by Dwr Cymru to be done by March 2015.

First Year in 5 Year Housing Land Supply 1999

Consultation Response

PCC response: Development marginal because of 50% affordable housing requirement in addition to other restrictions, eg replacement playing field, upgrading of sewerage works.

HBF Response: This site has had no interest from a developer and has been in the supply for more than 14 years. The site is also NPA owned and they are now selling the site due to severe constraints with sewerage requirements. The site is also proposed to deliver 50% affordable housing on top of these significant constraints.

We are perplexed at how this site can be proposed to be included in the 5 year supply, particularly when the TAN states that sites that have remained undeveloped for just 5 years should be moved to 3(i).

Clearly the site should be in 3(i).

The need to ensure sites are deliverable and genuinely available is particularly pertinent, considering the Minister's recent statement as mentioned above.

NPA Position

PCC Property Dept has previously been advised that the 50% affordable housing requirement is negotiable depending on viability of bring a proposal forward. Further discussion on their intentions would be welcome.

PCC and not PCNPA are the owners of the site. The constraints caused by the sewage treatment works are not the reason for wishing to dispose of the land. The proposed works to the STW by Dwr Cymru are cited as the catalyst to PCC disposing of the site and the forecast takes the time delay into account.

Policy 45 of the Local Development Plan and supporting guidance allows for negotiation of the affordable housing contribution where proposals are shown to be unviable. Officers anticipate that one of the outcomes of the current affordable housing Scrutiny Review Committee being carried out by the National Park Authority will be to re-run the Three Dragons Toolkit for sites allocated in the Plan, taking account of any increases in costs since the LDP was adopted. The product of this exercise will be communicated to the relevant landowners and developers in this financial year. The intention is to assist in bringing forward allocated sites in the Local Development Plan.

No change is suggested.

Site Ref: HA792

Bank House, Whitchurch Lane

Comp 0 UC 0 NS 12 Y1 0 Y2 0 Y3 0 Y4 6 Y5 6

0 units in 3i

Landowner/Developer Intentions

Landowner contacted as part of the Land Implementation Study (March 2013). Intention is to take the site forward for development in the short to medium term.

Developer/Landowner/Agent Details

Planning Status

Allocation in the LDP for 12 residential units, 6 to be affordable housing. Phased for development 2012-17.

Site Constraints

Solva Sewage Treatment Works is currently operating at capacity and requires improvements. These are programmed by Dwr Cymru to be done by March 2015.

First Year in 5 Year Housing Land Supply

2011

Consultation Response

HBF response: This site has remained undeveloped for nearly 9 years and is still proposed within the 5 year supply. The only evidence for this is that the land owner has stated an intention to develop the site in the short to medium term. There is no planning permission on the site and no developer interest in the site. Given this and the advice in the TAN, we do not believe the land owners assumptions are sufficient evidence for the site to remain in the supply for year another year. The site should be moved to 3(i) until there is a developer on board that gives a clear intention to develop the site in the next years.

The need to ensure sites are deliverable and genuinely available is particularly pertinent, considering the Minister's recent statement as mentioned above.

NPA Position

This site was allocated for the first time in the Local Development Plan (adopted September 2010) as prior to this there were covenants in place which prevented its development. The date provided above is a typing error and needs to be amended. The landowner has provided up to date information stating an intention to bring the land forward for development. It is suggested that the development be moved back to years 4 and 5. This will continue to reflect the intentions of the landowner and allow for applications to be made.

Suggested change: That 6 units are put into year 4 and 6 units into year 5. That the first year in 5 year housing land supply is amended to 2011.

ST DAVIDS

Site Ref: HA789

Adj Ysgol Bro Dewi, Nun St

Comp 0 UC 0 NS 10

Y1 0 Y2 0 Y3 0 Y4 0 Y5 5

5 units in 3i

Landowner/Developer Intentions

Developer/Landowner/Agent Details

Ms Pert and Mrs E Smith

Planning Status

Allocation in the LDP for 10 residential units, 5 to be affordable housing.

Site Constraints

No known constraints

First Year in 5 Year Housing Land Supply

2010

Consultation Response

HBF response: We reiterate our comments from the previous 2 years on this site. The site will require 50% affordable housing which we believe this would impact significantly on development viability and therefore would make the delivery of this site extremely

NPA Position

Policy 45 of the Local Development Plan and supporting guidance allows for negotiation of the affordable housing contribution where proposals are shown to be unviable. Officers anticipate that one of the outcomes of the current affordable housing Scrutiny Review

difficult. There is no planning application or developer on board. As such, this site should be moved to 3(i), until we have proof that a developer is on board and intends to develop.

The need to ensure sites are deliverable and genuinely available is particularly pertinent, considering the Minister's recent statement as mentioned above.

Committee being carried out by the National Park Authority will be to re-run the Three Dragons Toolkit for sites allocated in the Plan, taking account of any increases in costs since the LDP was adopted. The product of this exercise will be communicated to the relevant landowners and developers in this financial year. The intention is to assist in bringing forward allocated sites in the Local Development Plan.

In light of the lack of interest from the landowners at present agree to move the delivery of the sites to the end of the five-year period.

Proposed change: Year 2 0 units; year 3 0 units; year 4 0 units; year 5 5 units; 5 units in 3i.

ST ISHMAELS

Site Ref: MA733

Adj to school

Comp 0 UC 0 NS 40

Y1 0 Y2 4 Y3 4 Y4 4 Y5 4

24 units in 3i

Landowner/Developer Intentions

Smaller parcel of land formerly owned by Church sold to private developer who has approached the NPA with initial ideas for development. Agent for remaining land also in contact with NPA re bringing site forward for development.

Developer/Landowner/Agent Details

Mr David Warren-Davies (c/o Mr Roger Anderson and Associates). Vivard Limited.

Planning Status

Allocation in the LDP for 40 residential units, 20 to be affordable housing. Phased for development 2012-17 (16 units) and 2018-2021 (24 units). Awaiting submission of comprehensive layout for consideration through the pre-application process.

Site Constraints

Detailed proposal will need to be screened for likely significant effect under Regulation 48 of the 1994 Habitats Regulations, though the ecological assessment of the site prior to allocation concludes that any effects will be negligible and easily avoided.

First Year in 5 Year Housing Land Supply 2010

Consultation Response

HBF response: Please can the NPA clarify how many homes will be on the small parcel of land purchased by the developer. We believe only these units should be included in the 5 year supply.

NPA Position

It is not clear why the HBF considers this to be the case when the agent for the remaining land is as interested in bringing land forward for development. A meeting with all interested parties is planned for autumn 2013.

The site needs to be considered as a whole. Initial enquiries have suggested up to 22 dwellings on the smaller parcel of land but discussions are ongoing.

No change is suggested.

TENBY

Site Ref: NP/259/89 HA377

Brynhir

Comp 0 UC 0 NS 168 Y1 0 Y2 0 Y3 0 Y4 10 Y5 10

148 units in 3i

Landowner/Developer Intentions

Developer/Landowner/Agent Details

Pembrokeshire County Council

Planning Status

Allocation in the LDP for 168 residential units, 101 to be affordable housing. Phased for development 2007-11 (30 units) 2012-17 (90 units) and 2018-2021 (48 units). Also allocated in the JUDP and Local Plan (for 120 units).

Site Constraints

Impact on sewerage network and treatment works will need to be assessed. Site access from the A478 will require significant road improvements.

First Year in 5 Year Housing Land Supply

Consultation Response

PCC Response: Requirement for 60% affordable housing and high initial infrastructure costs will make this site unattractive to developers.

HBF response: This site is owned by Pembrokeshire NPA, who have stated that the high affordable housing percentage will make the site unattractive for potential developers. It has remained in the supply since 1999, which is clearly contrary to the TAN. There is absolutely no evidence for any units to be proposed in the 5 year supply and therefore the site should be moved to 3(i).

The need to ensure sites are deliverable and genuinely available is particularly pertinent, considering the Minister's recent statement as mentioned above.

NPA Position

Policy 45 of the Local Development Plan and supporting guidance allows for negotiation of the affordable housing contribution where proposals are shown to be unviable. Officers anticipate that one of the outcomes of the current affordable housing Scrutiny Review Committee being carried out by the National Park Authority will be to re-run the Three Dragons Toolkit for sites allocated in the Plan, taking account of any increases in costs since the LDP was adopted. The product of this exercise will be communicated to the relevant landowners and developers in this financial year. The intention is to assist in bringing forward allocated sites in the Local Development Plan.

No change is suggested.

Site Ref: HA752 Butts Field Car Park Comp 0 UC 0 NS 80

Y1 0 Y2 0 Y3 0 Y4 0 Y5 0

80 units in 3i

Landowner/Developer Intentions

Landowner contacted as part of Land Implementation Study (March 2013). Intention to develop in the longer term, driven largely by market conditions.

Developer/Landowner/Agent Details

Pembrokeshire County Council

Planning Status

Allocation in the LDP for 80 residential units, 48 to be affordable housing

Site Constraints

Retention of car parking facility will need to be part of any development of this site.

First Year in 5 Year Housing Land Supply

2010

Consultation Response

PCC Response: Development severely constrained by requirement for 60% affordable housing and replacement car parking. Provision of multi storey is uneconomic therefore alternative site would need to be found and this appears unlikely.

NPA Position

The provision of a multi-storey car park was part of a proposal put forward by Pembrokeshire County Council some years ago. It is suggested that the Council make contact with this Authority to provide evidence about the viability of developing this site. Policy 45 of the Local Development Plan and supporting guidance allows for negotiation of the affordable housing contribution where proposals are shown to be unviable.

No change is suggested.

4.0 FIVE YEAR LAND SUPPLY CALCULATIONS

Disputed Position

4.1 The 5 year land supply is calculated using the residual method. Table 1 shows the 5-year land supply based on the Pembrokeshire Coast National Park Authority proposed schedule.

Table 1 – Pembrokeshire Coast National Park Authority Housing Land Supply Calculation (A full list of sites can be found in Appendix 1)

	PCNPA Ho	using Land S	upply 0	1 st Apri	I 2013	- 2018	(Large	Sites)
		5 Year Land S (TAN 1 categor				Beyond Years	d 5	
	Proposed homes	Under construction	1	2	2*	3 (i)	3 (ii)	Homes completed since last study
Total	1007	19	64	345	0	579	0	19

4.2 Table 2 shows the 5-year land supply calculation with disputed sites taken into account.

Table 2 – Disputed Sites Land Supply Calculation (A full list of sites can be found in Appendix 1)

Dis	uputed Site	s Housing La	nd Sup _l	oly 01 st	April	2013 – 2	2018 (La	arge Sites)			
	5 Year Land Supply Beyond 5 (TAN 1 categories) Years										
	Proposed homes	Under construction	1	2	2*	3 (i)	3 (ii)	Homes completed since last study			
Total	1007	19	57	176	0	755	0	19			

Small Site Supply

4.3 Normally small sites of less than 5 dwellings are based on completions for the last five years.

Table 3 – Small Site and Conversion Completions for previous 5 years

	Sr	nall Site (Completi	ons								
2008 -	2008 - 2009 - 2010 - 2011 - 2012- Total											
2009	2010	2011	2012	2013								
30	19	20	16	16	101							

The small sites 5 year annual average is (101/5 = 2.20)

- 4.4 PCNPA overall total 5 year land supply (large + small sites) is 529 (428+ 101).
- 4.5 HBF/PCC overall total 5 year land supply (large and small sites) is 353 (252 + 101)

5-Year Land Supply Calculation

Pembrokeshire Coast National Park Authority

Table 4: (Residual Method: Pembrokeshire Coast National Park Local Development Plan 2006- 2021)

LDP Provision 2006-	Completions 01/04/2007 31/03/2013	Remainder April 2012- 2021 (9	5 Year Requirement	Total Annual Building Requirement	Total Land Available	Total Land Supply
2021 (15 Years)		Years) c=a-b	d=c/8*5 d=1323/9*5	e=d/5	(inc small sites)	g=f/e
а	b	С	d	е	f	g
1600	312	1288	805	161	529	3.3

Home Builders Federation/Pembrokeshire County Council

Table 5: (Residual Method: Pembrokeshire Coast National Park Local Development Plan 2006- 2021)

LDP Provision 2006- 2021 (15	Completions 01/04/2007 31/03/2013	Remainder April 2012- 2021 (9 Years)	5 Year Requirement	Total Annual Building Requirement	Total Land Available (inc	Total Land Supply
Years)		c=a-b	d=c/8*5 d=1323/9*5	e=d/5	small sites)	g=f/e
а	b	С	d	е	f	g
1600	312	1288	805	161	353	2.2

Appendix 1 – Site Schedules

Schedule 1 – Agreed Sites

There are no continuing matters of disagreement for the following sites:

LPA Ref No	Address	Units Built Since Last Study	Total Units Capacity	Units Remg	Hectares Rmng	U/C	Categorisation Categreiddio							
Rhif Cyf ACLI	Cyferiad	Unedau a Adeiladwyd Ers yr Astudiarth ddiwethaf	Cyfanswm Unedau	Unedau sydd ar ol	Hectaurau sydd ar ol	W/A	2014	2015	2016	2017	2018	2 *	3(i)	3(ii)
MA776	North East of Marine Road Broad Haven	0	35	35	2.29	0	0	0	7	7	7	0	14	0
HA750	Depot Site Crymych	0	18	18	0.37	0	10	8	0	0	0	0	0	0
HA387	Opposite Bay View Terrace, Dinas Cross	0	12	12	0.25	0	0	0	0	6	6	0	0	0
HA732	East of Herbrandston Hall	0	12	12	0.38	0	0	0	0	0	0	0	12	0
NP/07/402	Adj Landway Farm, Jameston	0	6	6	0.20	0	0	2	2	2	0	0	0	0
HA821	Green Grove, Jameston	0	5	5	0.36	0	0	1	2	2	0	0	0	0
NP/09/488	Newport Garage, Newport	0	10	10	0.12	4	0	2	2	2	0	0	0	0
HA825	North of Feidr Eglwys, Newport	0	20	20	1.50	0	0	5	5	5	5	0	0	0
NP/06/623	Jalna Hotel, Saundersfoot	0	9	9	0.10	0	0	3	6	0	0	0	0	0
NP/12/0054	Cambrian Hotel, Saundersfoot	0	28	28	0.30	0	0	7	7	7	7	0	0	0
	Land at Ynys Dawel, Solva	0	7	7	0.40	0	0	0	0	0	0	0	7	0
HA385	North Twr y Felin, St Davids	2	21	8	0.82	2	2	2	2	0	0	0	0	0
HA737	West of Glasfryn Road, St Davids	0	90	90	3.80	0	0	0	0	0	0	0	90	0
NP/08/60	Land north of Burgage Green Close, St Ishmaels	0	5	2	0.10	0	0	2	0	0	0	0	0	0
NP/03/519	Butterhill Farm, St Ishmaels	0	6	1	0.03	1	0	0	0	0	0	0	0	0
NP/08/3489	Guildhall and Glendower House, Tenby	17	21	0	0	0	0	0	0	0	0	0	0	0
NP/96/105	Haytor Gardens, Tenby	0	17	1	0.07	1	0	0	0	0	0	0	0	0
HA723	Former Hospital Site, Tenby	0	10	10	0.17	0	0	5	5	0	0	0	0	0
HA727	West of Narberth Road, Tenby	0	25	25	1.14	0	0	0	0	0	5	0	20	0
HA760	Reservoir Site, Tenby	0	12	12	0.33	0	0	0	0	0	0	0	12	0
MA707	White Lion Street/ Deer Park, Tenby	0	64	64		0	39	14	11	0	0	0	0	0
HA724	Rectory Car Park, Tenby	0	50	50	0.94	0	0	0	0	0	0	0	50	0

Total		19	538	472		14	57	63	52	31	30	0	225	0
NP/05/509	Rear of Caeglas and Llygod yr Haul, Whitchurch	0	5	3	0.26	0	0	1	2	0	0	0	0	0
NP/04/400	Boulston Manor, Uzmaston	0	5	5	0.37	0	2	2	1	0	0	0	0	0
NP/05/331	Picton Home Farm, Picton	0	8	8	0.28	0	4	4	0	0	0	0	0	0
HA738	North of Heol Crwys, Trefin	0	15	15	0.61	0	0	0	0	0	0	0	15	0
MA710	Sergeant's Lane, Tenby	0	5	5	0.09	0	0	0	0	0	0	0	5	0
NP/09/064	Fountains Café Affordable Site, Tenby	0	5	5		0	0	5	0	0	0	0	0	0
NP/09/064	Fountains Café, Tenby	6	12	6	0.09	6	0	0	0	0	0	0	0	0

Schedule 2 – Sites amended as a result of the consultation but still remain disputed

LPA Ref No	Address	Units Built Since Last Study	Total Units Capacity	Units Remg	Hectares Rmng	U/C		orisation preiddio	n					
Rhif Cyf ACLI	Cyferiad	Unedau a Adeiladwyd Ers yr Astudiarth ddiwethaf	Cyfanswm Unedau	Unedau sydd ar ol	Hectaurau sydd ar ol	W/A	2014	2015	2016	2017	2018	2 *	3(i)	3(ii)
HA382	Castle Way, Dale	0	12	12	0.55	0	0	0	0	0	4	0	8	0
HA730	Opposite Bush Terrace, Jameston	0	35	35	1.69	0	0	0	0	0	8	0	27	0
MA895	Land part of Buttylands, Manorbier Station	0	15	15	0.59	0	0	0	0	0	3	0	12	0
NP/06/106	Newport Pottery, Newport	0	6	6	0.09	0	0	0	0	0	6	0	0	0
HA792	Bank House, Solva	0	12	12	0.61	0	0	0	0	6	6	0	0	0
HA789	Adj Ysgol Bro Dewi, St Davids	0	10	10	0.56	0	0	0	0	0	5	0	5	0
Total		0	105	105		0	0	0	0	6	32	0	67	0

Schedule 3 – Disputed Sites

LPA Ref No	Address	Units Built Since Last Study	Total Units Capacity	Units Remg	Hectares Rmng	U/C	Categorisation Categreiddio		

Rhif Cyf ACLI	Cyferiad	Unedau a Adeiladwyd Ers yr Astudiarth ddiwethaf	Cyfanswm Unedau	Unedau sydd ar ol	Hectaurau sydd ar ol	W/A	2014	2015	2016	2017	2018	2 *	3(i)	3(ii)
HA734	South of Driftwood Close, Broad Haven	0	8	8	0.66	0	0	2	2	2	2	0	0	0
NP/04/462	Site of former Sir Benfro Hotel, Hebrandston	0	28	28	0.90	5	6	6	6	5	0	0	0	0
HA559	Adj Home Farm, Lawrenny	0	30	30	1.07	0	0	0	5	5	5	0	15	0
HA848	Opposite Manorbier VC School, Manorbier	0	19	19	0.64	0	0	0	3	3	3	0	10	0
HA813	Rear of Cross Park, New Hedges	0	30	30	1.42	0	0	5	5	5	5	0	10	0
NP/033/91	Land adj Ridgeway and Incline	0	20	9	0.86	0	1	0	2	3	3	0	0	0
HA384	Adj Bro Dawel, Solva	0	18	18	1.65	0	0	0	6	6	6	0	0	0
MA733	Adj School, St Ishmaels	0	40	40	2.39	0	0	4	4	4	4	0	24	0
HA377	Brynhir, Tenby	0	168	168	6.35	0	0	0	0	10	10	0	148	0
HA752	Butts Field Car Park, Tenby	0	80	80	0.94	0	0	0	0	0	0	0	80	0
Total	·	0	441	430		5	7	17	33	43	38	0	287	0

Appendix 2 - Site Proformas

BROAD HAVEN

Site Ref: HA 734

South of Driftwood Close

Comp 0 UC 0 NS 8 Y1 0 Y2 2 Y3 2 Y4 2 Y5 2 0 units in 3i

Landowner/Developer Intentions

Land owner confirmed desire to submit and outline planning application in first half of 2013 in response to survey undertaken as part of Land Implementation Study (March 2013).

Developer/Landowner/Agent Details

Mr Llewellyn (Owner)

Planning Status

Allocated in the LDP for 8 units, 4 to be affordable housing. Phased for development 2012-17 **Site Constraints**

No known constraints. Offsite sewer provision will be required.

First Year in 5 Year Housing Land Supply

Consultation Response

PCC response: PCC suggests that the site should be moved into the 3i category until an outline application is submitted, unless the recently completed deliverability study suggest otherwise.

NPA Position

The landowner responded to a survey as part of the Land Implementation Study above which provides the most up-to-date information. The landowner has recently been in contact with the Authority regarding the affordable housing contribution at this site. We have no evidence contrary to that given by the landowner and consider the NPA forecast is reasonable.

No change is suggested.

Site Ref: MA776

North East of Marine Road

Comp 0 UC 0 NS 35 Y1 0 Y2 0 Y3 7 Y4 7 Y5 7 14 units in 3i

Landowner/Developer Intentions

Landowner contacted as part of Land Implementation Study (March 2013). Currently exploring the development of the site, but has identified two abnormal costs associated with requirement for assessment of South Sewage Pumping Station to establish if improvements are necessary and land stabilisation issues due to past mining activity.

Developer/Landowner/Agent Details

Ownership - Pembrokeshire County Council and Messrs Raymond. Agent Paul Hales.

Planning Status

Mixed allocation in the LDP for 35 residential units, 13 to be affordable housing, community facility and workshops. Phased for development 2012-17.

Site Constraints

Possibly pumping station capacity and access road construction.

First Year in 5 Year Housing Land Supply

2010

Consultation Response	NPA Position
No comments.	Position agreed.
	No change is suggested.

CRYMYCH

Site Ref: HA750 **Depot Site**

Comp 0 UC 0 NS 18 Y1 10 Y2 8 Y3 0 Y4 0 Y5 0 0 units in 3i

Landowner/Developer Intentions

Pembrokeshire County Council have sold the site to Tai Cantref Housing Association. A planning application for 18 affordable dwellings was granted by the National Park Authority in April 2013 (beyond the end of this study period). Tai Cantref have advised that funding for the scheme is available in 2014 with the site to be occupied by 2015.

Developer/Landowner/Agent Details

Tai Cantref Housing Association.

Planning Status

Allocated in the LDP for 15 units, 8 to be affordable housing.

Site Constraints

No known constraints

First Year in 5 Year Housing Land Supply

1999

Consultation Response	NPA Position
PCC response: This site is still under offer to Tai Cantref Housing Association. Given their forward programme intentions, the site should remain in the 5 year supply.	Position agreed. No change is suggested.

DALE

Site Ref: HA382 Castle Way

Comp 0 UC 0 NS 12 Y1 0 Y2 0 Y3 0 Y4 0 Y5 4

8 units in 3i

Landowner/Developer Intentions

Landowner contacted in March 2013 as part of Land Implementation Study. Has stated no intention to develop the site in the foreseeable future unless the affordable housing requirement is reduced.

Developer/Landowner/Agent Details

Dale Castle Estate (Owner)

Planning Status

Allocated in the LDP for 12 units, 10 to be affordable housing. Allocated in preceeding JUDP and Local Plan.

Site Constraints

No known constraints

First Year in 5 Year Housing Land Supply

Consultation Response

PCC Response: Site should be in 3i due to the Developer's intention for the site or unless there are proposals in place to renegotiate the affordable housing contribution.

HBF Response: This site was first recorded in the schedule in 1999 and it has still not been developed. The site has therefore been in the supply for more than 14 years, which is clearly contrary to the TAN. In addition to this, the landowner has stated no intention to develop the site in the foreseeable future unless the affordable housing requirement is reduced.

This site should clearly be in 3(i).

The need to ensure sites are deliverable and genuinely available is particularly pertinent, considering the Minister's recent statement as mentioned above.

NPA Position

Policy 45 of the Local Development Plan and supporting guidance allows for negotiation of the affordable housing contribution where proposals are shown to be unviable. Officers anticipate that one of the outcomes of the current affordable housing Scrutiny Review Committee being carried out by the National Park Authority will be to re-run the Three Dragons Toolkit for sites allocated in the Plan, taking account of any increases in costs since the LDP was adopted. The product of this exercise will be communicated to the relevant landowners and developers in this financial year. The intention is to assist in bringing forward allocated sites in the Local Development Plan.

However, given the lack of interest from the landowner in bringing this site forward for development at the present time it is agreed to put back the forecast to the end of the 5 year period to allow for discussions to take place.

Proposed change: Yr3 0; Yr4 0; Yr5 4 and 8 units in 3i.

DINAS CROSS

Site Ref: HA387

Opposite Bay View Terrace

Comp 0 UC 0 NS 12 Y1 **0** Y2 **0** Y3 **0** Y4 **6** Y5 **6**

0 units in 3i

Landowner/Developer Intentions

Landowner contacted as part of Land Implementation study but no response was received. **Developer/Landowner/Agent Details**

Planning Status

Allocated in LDP for 100% affordable housing.

Site Constraints

No known constraints

First Year in 5 Year Housing Land Supply 1999

NPA Position
Position agreed.
No change is suggested.

HERBRANDSTON

Site Ref: NP/04/462

Site of former Sir Benfro Hotel

Comp 0 UC 5 NS 23 Y1 6 Y2 6 Y3 6 Y4 5 Y5 0

0 units in 3i

Landowner/Developer Intentions

Development commenced on this site but no recent activity on site. Company still operating but may be affecting by development of large site being developed by Persimmon nearby in Milford Haven. Developer contacted June 2013 re intentions for site, but no response to date.

Developer/Landowner/Agent Details

Max Thomas Developments.

Planning Status

Permission 07/344 for 28 units, 6 to be affordable

Site Constraints

None known.

First Year in 5 Year Housing Land Supply

2004

Consultation Response

HBF response: This site has been around since 2004 and despite an extant permission, there has been no activity to date. The previous comments on this site stated that viability is an issue. The delivery of the site is also affected by the Persimmon site in Milford Haven.

We made these comments last year and the year before and we cannot keep giving sites the benefit of the doubt, when there is no clear evidence that the site will be developed over the next 5 years. The need to ensure sites are deliverable and genuinely available is particularly pertinent, considering the Minister's recent statement as mentioned above.

In light of the above, the site should be moved to 3(i).

NPA Position

The has been activity on this site (see above) with commencement recorded in the 2012 JHLAS. Five units are currently partly constructed on site although there has been no recent activity. The developer remains in business.

No change is suggested.

Site Ref: HA732

East of Herbrandston Hall

Comp 0 UC 0 NS 12 Y1 0 Y2 0 Y3 0 Y4 0 Y5 0

12 units in 3i

Landowner/Developer Intentions

Landowners contacted as part of the Land Implementation Study but no response was received.

Developer/Landowner/Agent Details

Planning Status

Allocated in the LDP for 12 units, 6 to be affordable housing.

Site Constraints				
First Year in 5 Year Housing Land Supply 2010				
Consultation Response	NPA Position			
	Position agreed.			
	No change is suggested.			

JAMESTON

Site Ref: NP/07/402 (HA436)

Adj Landway Farm Comp 0 UC 0 NS 6 Y1 0 Y2 2 Y3 2 Y4 2 Y5 0

0 units in 3i

Landowner/Developer Intentions

Site has been marketed since 2011. Access road completed and plots marked out. A water main has been laid to the site.

Developer/Landowner/Agent Details

Mrs Sally Thomas.

Planning Status

Has outline permission (07/402) for siting and means of access. Reserved matters application NP/11/273 expires August 2013.

Site Constraints

Site located on a major aquifer with water suitable for human consumption. Potential pollution and sewerage will need very careful consideration.

First Year in 5 Year Housing Land Supply 2001

Consu	Itation	Res	ponse

HBF response: The notes state that the RM expires on this site in August 2013. If the permission has not been implemented, we believe the site should be moved to 3(i).

NPA Position

The applicant has recently advised that two plots at this site are being developed. The permission is therefore preserved.

No change is suggested.

Site Ref: HA730

Opposite Bush Terrace Comp 0 UC 0 NS 35 Y1 0 Y2 0 Y3 0 Y4 0 Y5 8

27 units in 3i

Landowner/Developer Intentions

Landowner was contacted as part of Land Implementation Study (March 2013). She is waiting on the sale of plots on site HA436 (Land north of Landway Farm) prior to progressing work on this site.

Developer/Landowner/Agent Details

Mrs Sally Thomas

Planning Status

Allocation in the LDP for 35 residential units, 18 to be affordable housing. Phased for development 2012-17 (20 units) and 2018-21 (15 units).

Site Constraints

Development may require upgrading Sewage treatment works. This may delay development to after 2015. The phasing in the LDP reflects this.

First Year in 5 Year Housing Land Supply 2010

Consultation Response

HBF response: We reiterate our comments on this site from the last 2 years. The notes say this has been allocated in the LDP for 35 units with 18 to be affordable housing. We believe this would impact significantly on development viability and therefore would make the delivery of this site extremely difficult. This is compounded by the fact that there is no developer on board and the land owner is waiting to sell separate plots before the site can be developed. Also the notes state that development may require upgrading sewage treatment works, which could delay development to after 2015. This adds further uncertainty and would incur additional cost. As such, this site should be moved to 3(i), until we have proof that a developer is on board and intends to develop.

The need to ensure sites are deliverable and genuinely available is particularly pertinent, considering the Minister's recent statement as mentioned above.

NPA Position

Further contact has been made with the land owner who advises that given the latest position in relation to the sewerage system having capacity to accommodate this development, it is intended to bring the site forward for development within the next 4 years. In light of this information it is suggested that the forecast is moved back to the end of the 5 year period and beyond.

Proposed change: Yr4 0; 3i 27

Site Ref: HA821

Green Grove

Comp 0 UC 0 NS 5

Y1 0 Y2 1 Y3 2 Y4 2 Y5 0

0 units in 3i

Landowner/Developer Intentions

Landowner contacted as part of Land Implementation Study (March 2013). Was concerned about constraints relating to Dwr Cymru infrastructure. However it was identified in the same study that the are no sewerage capacity issues. An offsite sewer will be needed over a length of 130m. Water mains are required over 100m. The landowner has advised of intention to take site forward for development.

Developer/Landowner/Agent Details

Planning Status

Allocation in the LDP for 5 residential units, 3 to be affordable housing

Site Constraints

There are sewerage capacity issues in the area but the amount development is likely to be too small to be affected by this.

First Year in 5 Year Housing Land Supply 2010		
Consultation Response	NPA Position	
	Position agreed.	
	No change is suggested.	

LAWRENNNY

Site Ref: HA559

Adjacent Home Farm

Comp 0 UC 0 NS 30

Y1 0 Y2 0 Y3 5 Y4 5 Y5 5

15 units in 3i

Landowner/Developer Intentions

Landowner has concerns about providing 50% affordable housing.

Developer/Landowner/Agent Details

Mr David Lort-Phillips

Planning Status

Allocation in the LDP for 30 residential units, 15 to be affordable housing. Phased for development 2007-11 (15 units) and 2012-17 (15 units).

Site Constraints

No known constraints

First Year in 5 Year Housing Land Supply

2010

Consultation Response

HBF response: We stated last year that this site would not be developed because of the overly onerous affordable housing target. This has now been confirmed by the land owner. The site should be moved to 3(i) as there are clear viability issues (and crucially) there is absolutely no evidence to demonstrate that the site will be delivered in the next 5 years.

The need to ensure sites are deliverable and genuinely available is particularly pertinent, considering the Minister's recent statement as mentioned above.

NPA Position

Policy 45 of the Local Development Plan and supporting guidance allows for negotiation of the affordable housing contribution where proposals are shown to be unviable. Officers anticipate that one of the outcomes of the current affordable housing Scrutiny Review Committee being carried out by the National Park Authority will be to re-run the Three Dragons Toolkit for sites allocated in the Plan, taking account of any increases in costs since the LDP was adopted. The product of this exercise will be communicated to the relevant landowners and developers in this financial year. The intention is to assist in bringing forward allocated sites in the Local Development Plan.

No change is suggested.

MANORBIER STATION

Site Ref: HA848

Opp Manorbier VC School Comp 0 UC 0 NS 19 Y1 0 Y2 0 Y3 3 Y4 3 Y5 3

10 units in 3i

Landowner/Developer Intentions

Landowner contacted as part of the Land Implementation Study (March 2013). Wishes to sell land for development.

Developer/Landowner/Agent Details

Planning Status

Allocation in the LDP for 19 residential units, 10 to be affordable housing. Phased for development 2012-17 (9 units) and 2018-21 (10 units).

Site Constraints

There are no public sewers in the vicinity of this proposed development. Extensive offsite sewer provision is required but foul flows can be treated at Tenby West Treatment Works.

First Year in 5 Year Housing Land Supply

2010

Consultation Response

HBF response: We reiterate our comments from last year and the year before on this site. The notes say this has been allocated in the LDP for 19 units with 10 to be affordable housing. We believe this would impact significantly on development viability and therefore would make the delivery of this site extremely difficult. Also the notes state that development may require upgrading sewage treatment works. which could delav development to after 2015. This adds further uncertainty and would incur additional cost. The notes also state that the land owner wishes to sell the site but is not marketing the site and has not found a suitable developer.

In light of the above, this site should be moved to 3(i), until we have proof that a developer is on board and intends to develop.

The need to ensure sites are deliverable and genuinely available is particularly pertinent, considering the Minister's recent statement as mentioned above.

NPA Position

The land is being marketed by Guy Thomas Estate Agents.

Policy 45 of the Local Development Plan and supporting guidance allows for negotiation of the affordable housing contribution where proposals are shown to be unviable. Officers anticipate that one of the outcomes of the current affordable housing Scrutiny Review Committee being carried out by the National Park Authority will be to re-run the Three Dragons Toolkit for sites allocated in the Plan, taking account of any increases in costs since the LDP was adopted. The product of this exercise will be communicated to the relevant landowners and developers in this financial year. The intention is to assist in bringing forward allocated sites in the Local Development Plan.

Recent contact with landowners who have advised that they will shortly be submitting a planning application.

No change is suggested.

Site Ref: MA895

Land part of Buttylands Comp 0 UC 0 NS 15

Y1 **0** Y2 **0** Y3 **0** Y4 **0** Y5 **3**

12 units in 3i

Landowner/Developer Intentions

Pre-application enquiry made in January 2013. Landowner contacted as part of Land Implementation Study (March 2013). Currently considering how to proceed as land currently used as caravan park.

Developer/Landowner/Agent Details

Curtis Blain (Agent)

Planning Status

Mixed allocation in the LDP for 15 residential units, 8 to be affordable housing, and educational facility. Phased for development 2012-17 (8 units) and 2018-21 (7 units).

Site Constraints

Tenby West Waste Water Treatment Works is able to accommodate foul flows from this site but public sewer is approximately 1km from the site.

First Year in 5 Year Housing Land Supply 2010

Consultation Response

HBF response: We reiterate our comments from last year and the year before on this site. The notes say this has been allocated in the LDP for 15 residential units, 8 to be affordable housing, and educational facility. We believe this level of planning obligations could impact severely on development viability. Also the notes state development may require upgrading sewage treatment works. which could development to after 2015. This adds further uncertainty and would incur additional cost. The land owner also states he is considering how to move forward as the site is currently used as a caravan park! As such, this site should be moved to 3(i), until we have proof that a developer is on board and intends to develop.

The need to ensure sites are deliverable and genuinely available is particularly pertinent, considering the Minister's recent statement as mentioned above.

NPA Position

Policy 45 of the Local Development Plan and supporting guidance allows for negotiation of the affordable housing contribution where proposals are shown to be unviable. Officers anticipate that one of the outcomes of the current affordable housing Scrutiny Review Committee being carried out by the National Park Authority will be to re-run the Three Dragons Toolkit for sites allocated in the Plan, taking account of any increases in costs since the LDP was adopted. The product of this exercise will be communicated to the relevant landowners and developers in this financial year. The intention is to assist in bringing forward allocated sites in the Local Development Plan.

However given constraints linked to sewers and the need to consider the existing use it is suggested that the forecast is moved to the end of 5 year period and beyond.

Proposed change: Yr 3: 0; Yr 4 0; 3i 12

NEW HEDGES

Site Ref: HA813
Rear of Cross Park
Comp 0 UC 0 NS 30
Y1 0 Y2 5 Y3 5 Y4 5 Y5 5
10 units in 3i

Landowner/Developer Intentions

Landowner contacted as part of Land Implementation Study (March 2013). Site currently being progressed with intention to submit outline application later this year and to sell the site.

Developer/Landowner/Agent Details

Mr David Lewis

Planning Status

Mixed allocation in the LDP for 30 residential units, 18 to be affordable housing. Phased for development 2012-17 (15 units) and 2018-21 (15 units).

Site Constraints

First Year in 5 Year Housing Land Supply

2010

Consultation Response

HBF response: The notes state that there is an intention to submit outline application later this year and to sell the site. However, given the level of affordable housing on this site, we believe it would not be commercially viable to develop. We made these comments last year and the year before and therefore, we believe that until there is a developer on board, to demonstrate the site is deliverable, the site should be moved to 3(i).

The need to ensure sites are deliverable and genuinely available is particularly pertinent, considering the Minister's recent statement as mentioned above.

NPA Position

Policy 45 of the Local Development Plan and supporting guidance allows for negotiation of the affordable housing contribution where proposals are shown to be unviable. Officers anticipate that one of the outcomes of the current affordable housing Scrutiny Review Committee being carried out by the National Park Authority will be to re-run the Three Dragons Toolkit for sites allocated in the Plan, taking account of any increases in costs since the LDP was adopted. The product of this exercise will be communicated to the relevant landowners and developers in this financial year. The intention is to assist in bringing forward allocated sites in the Local Development Plan.

No change is proposed.

NEWPORT

Site Ref: NP/09/488

Newport Garage

Comp 0 UC 4 NS 6

Y1 0 Y2 2 Y3 2 Y4 2 Y5 0

0 units in 3i

u units in si

Landowner/Developer Intentions

Four affordable units under construction.

Developer/Landowner/Agent Details

Mr A Griffiths and Partner

Planning Status

Permission granted in 2010 (NP/09/488) for 10 units 4 to be affordable. Developer contacted July 2013 with regard to current position and timescale for completion. No response to date.

Site Constraints

No known constraints

First Year in 5 Year Housing Land Supply

2012

Consultation Response	NPA Position
	Position agreed.
	No change is suggested.

Site Ref: NP/06/106
The Newport Pottery
Comp 0 UC 0 NS 6
Y1 0 Y2 0 Y3 0 Y4 0 Y5 6
0 units in 3i

Landowner/Developer Intentions

Site is for sale (http://www.rightmove.co.uk/property-for-sale/property-33589436.html,

Developer/Landowner/Agent Details

Planning Status

Permission granted in 2009 (NP/06/106) for 6 units two to be affordable.

Site Constraints

No known constraints

First Year in 5 Year Housing Land Supply

2009

Consultation Response

HBF response: This site is currently for sale and we believe the permission has now expired. When a new permission is required the site will require 70% affordable housing, which will clearly destroy any chance of development.

The site should be removed from the schedule as it does not have permission.

NPA Position

Permission for the site has not expired. Landowner recently in contact with the Authority to explore options for developing the site. Tai Cantref Housing Association considering further approach to the landowner.

Agree that the forecast should be moved to the end of the 5-year period.

Proposed change: Yr1 0; Yr2 0; Yr5 6

Site Ref: HA825 **North of Feidr Eglwys** Comp 0 UC 0 NS **20** Y1 **0** Y2 **5** Y3 **5** Y4 **5** Y5 **5**

0 units in 3i

Landowner/Developer Intentions

Pre-application submitted January 2013. Further discussions are on-going with intention of submitting a planning application. Possibility of small increase in numbers of units on the site.

Developer/Landowner/Agent Details

Agent - Wyn Harries Design and Management.

Planning Status

Allocation in the LDP for 20 residential units, 14 to be affordable housing.

Site Constraints

None known.

First Year in 5 Year Housing Land Supply

2010

NPA Position
Position agreed.
No change is suggested.

SAUNDERSFOOT

Site Ref: NP/06/623

Jaina Hotel

Comp 0 UC 0 NS 9

Y1 0 Y2 3 Y3 6 Y4 0 Y5 0

0 units in 3i

Landowner/Developer Intentions

Currently being used to accommodate staff from nearby hotel.

Developer/Landowner/Agent Details

Owner – Mr R King

Planning Status

Planning permission for conversion of hotel to 9 units (NP/06/623) with 2 affordable units.

Site Constraints

None known

First Year in 5 Year Housing Land Supply

2012

Consultation Response	NPA Position
	Position agreed.
	No change is suggested.

Site Ref: MA777 Cambrian Hotel Comp 0 UC 0 NS 28 Y1 0 Y2 7 Y3 7 Y4 7 Y5 7

0 units in 3i

Landowner/Developer Intentions

Planning permission NP/05/0476 lapsed January 2013. New application for mixed residential/commercial use on this and Site MA777 (below) approved June 2013.

Developer/Landowner/Agent Details

Stakefield (Saundersfoot) Limited. Agent - Willis and Hole, Narberth

Planning Status

Lapsed planning permission (NP/05/476) for mixed residential and commercial conversion of hotel. New application (NP/12/0054) approved June 2013 for 20 flats and 8 dwellings (including 6 affordable units). Permission also includes commercial development. Permission includes change of use of hotel and development of site at rear of the hotel.

Site Constraints

In TAN15 zone C2

First Year in 5 Year Housing Land Supply

2004

Consultation Response	NPA Position
	Position agreed.
	No change is suggested.

Site Ref: NP/033/91

Land adj Rigeway & Incline

Comp 11 UC 0 NS 9 Y1 1 Y2 0 Y3 2 Y4 3 Y5 3

0 units in 3i

Landowner/Developer Intentions

Site owned/ developed by small builder/developer. No recent activity on site. Landowner has approached NPA to discuss future development of remaining area of this site (May 2013).

Developer/Landowner/Agent Details

AJ Collins

Planning Status

Permission NP/06/0343 extant for plot 12 – last remaining plot with reserved matters permission. Outline permission for plots 13 to 20 lapsed.

Site Constraints

None known

First Year in 5 Year Housing Land Supply 1991

Consultation Response

HBF response: 8 of these plots do not have planning permission and therefore the site does not have a valid permission. The site should be removed from the schedule.

NPA Position

August 2013 – pre-application enquiry received relating to developing the remainder of the site and affordable housing provision.

No change is suggested.

SOLVA

Site Ref: HA384

Adj Bro Dawel

Comp 0 UC 0 NS 18

Y1 0 Y2 0 Y3 6 Y4 6 Y5 6

0 units in 3i

Landowner/Developer Intentions

Landowner was contacted as part of the Land Implementation Study (March 2013). Has advised that following upgrades to sewerage system programmed by Dwr Cymru by March 2015 that will seek to dispose of the site for development.

Developer/Landowner/Agent Details

Pembrokeshire County Council.

Planning Status

Allocation in the LDP for 18 residential units, 9 to be affordable housing. Phased for development 2012-17.

Site Constraints

Solva Sewage Treatment Works is currently operating at capacity and requires improvements. These are programmed by Dwr Cymru to be done by March 2015.

First Year in 5 Year Housing Land Supply 1999

Consultation Response

PCC response: Development marginal because of 50% affordable housing requirement in addition to other restrictions, eg replacement playing field, upgrading of sewerage works.

HBF Response: This site has had no interest from a developer and has been in the supply for more than 14 years. The site is also NPA owned and they are now selling the site due to severe constraints with sewerage requirements. The site is also proposed to deliver 50% affordable housing on top of these significant constraints.

We are perplexed at how this site can be proposed to be included in the 5 year supply, particularly when the TAN states that sites that have remained undeveloped for just 5 years should be moved to 3(i).

Clearly the site should be in 3(i).

The need to ensure sites are deliverable and genuinely available is particularly pertinent, considering the Minister's recent statement as mentioned above.

NPA Position

PCC Property Dept has previously been advised that the 50% affordable housing requirement is negotiable depending on viability of bring a proposal forward. Further discussion on their intentions would be welcome.

PCC and not PCNPA are the owners of the site. The constraints caused by the sewage treatment works are not the reason for wishing to dispose of the land. The proposed works to the STW by Dwr Cymru are cited as the catalyst to PCC disposing of the site and the forecast takes the time delay into account.

Policy 45 of the Local Development Plan and supporting guidance allows for negotiation of the affordable housing contribution where proposals are shown to be unviable. Officers anticipate that one of the outcomes of the current affordable housing Scrutiny Review Committee being carried out by the National

Park Authority will be to re-run the Three Dragons Toolkit for sites allocated in the Plan, taking account of any increases in costs since the LDP was adopted. The product of this exercise will be communicated to the relevant landowners and developers in this financial year. The intention is to assist in bringing forward allocated sites in the Local Development Plan.

No change is suggested.

Site Ref:

Land at Ynys Dawel Comp 0 UC 0 NS 7 Y1 0 Y2 0 Y3 0 Y4 0 Y5 0

7 units in 3i

Landowner/Developer Intentions

Developer/Landowner/Agent Details

Planning Status

Remaining plots of a development completed to the south (outline planning consent HR/6142, issued 1965). Estate roads are complete but no evidence of any interest in developing this part of the site

Site Constraints

First Year in 5 Year Housing Land Supply

Consultation Response	NPA Position
	Position agreed.
	No change is suggested.

Site Ref: HA792

Bank House, Whitchurch Lane

Comp 0 UC 0 NS 12 Y1 0 Y2 0 Y3 0 Y4 6 Y5 6

0 units in 3i

Landowner/Developer Intentions

Landowner contacted as part of the Land Implementation Study (March 2013). Intention is to take the site forward for development in the short to medium term.

Developer/Landowner/Agent Details

Planning Status

Allocation in the LDP for 12 residential units, 6 to be affordable housing. Phased for development 2012-17.

Site Constraints

Solva Sewage Treatment Works is currently operating at capacity and requires improvements. These are programmed by Dwr Cymru to be done by March 2015.

First Year in 5 Year Housing Land Supply

2011

Consultation Response

HBF response: This site has remained undeveloped for nearly 9 years and is still proposed within the 5 year supply. The only evidence for this is that the land owner has stated an intention to develop the site in the short to medium term. There is no planning permission on the site and no developer interest in the site. Given this and the advice in the TAN, we do not believe the land owners assumptions are sufficient evidence for the site to remain in the supply for year another year. The site should be moved to 3(i) until there is a developer on board that gives a clear intention to develop the site in the next vears.

The need to ensure sites are deliverable and genuinely available is particularly pertinent, considering the Minister's recent statement as mentioned above.

NPA Position

This site was allocated for the first time in the Local Development Plan (adopted September 2010) as prior to this there were covenants in place which prevented its development. The date provided above is a typing error and needs to be amended. The landowner has provided up to date information stating an intention to bring the land forward for development. It is suggested that the development be moved back to years 4 and 5. This will continue to reflect the intentions of the landowner and allow for applications to be made.

Suggested change: That 6 units are put into year 4 and 6 units into year 5. That the first year in 5 year housing land supply is amended to 2011.

ST DAVIDS

Site Ref: HA385
North of Twr y Felin
Comp 13 UC 2 NS 8
Y1 2 Y2 2 Y3 2 Y4 0 Y5 0
0 units in 3i

Landowner/Developer Intentions

Site being sold off as single plots.

Developer/Landowner/Agent Details

Landowners - Mr R Griffiths and Mr D Chant

Planning Status

Site continues to be developed at the rate of about 2 dwellings per year.

Site Constraints

No known constraints

First Year in 5 Year Housing Land Supply

1999

Consultation Response	NPA Position
	Position agreed.
	No change is suggested.

Site Ref: HA737
West of Glasfryn Road
Comp 0 UC 0 NS 90
Y1 0 Y2 0 Y3 0 Y4 0 Y5 0
90 units in 3i

Landowner/Developer Intentions

Landowner contacted as part of Land Implementation Study (March 2013). Confirmed desire to progress site for development.

Developer/Landowner/Agent Details

Grey Family and Mr and Mrs Smith

Planning Status

Allocation in the LDP for 90 residential units, 45 to be affordable housing. Phased for development 2012-17 (30 units) and 2018-2021 (60 units).

Site Constraints

Development dependent on upgrading of road. Pembrokeshire County Council is reviewing previous feasibility work on the scheme and is applying for further funding through the Regional Transport Plan to develop the design further. Works unlikely before 2015.

First Year in 5 Year Housing Land Supply 2010

Consultation Response

HBF response: We reiterate our comments from the previous 2 years on this site. The notes say this has been allocated in the LDP for 90 units with 45 to be affordable housing. We believe this would impact significantly on development viability and therefore would make the delivery of this site extremely difficult. Also the notes state that development may require upgrading sewage which could delay treatment works, development to after 2015. This adds further uncertainty and would incur additional cost. In addition to this, the notes state that PCC have advised that they will be applying for funding road improvements but there is no evidence on the likelihood of this being granted. If it is not granted, the authority has stated that housing and employment developments along Glasfryn road to fund the road improvements. This again will add significant cost and will further add to the uncertainty development. of

In light of the prevailing evidence, we do not believe this site should be allowed to remain in the supply for yet another year. We believe this site should be moved to 3(i), until we have proof that a developer is on board and intends to develop.

The need to ensure sites are deliverable and genuinely available is particularly pertinent, considering the Minister's recent statement as mentioned above.

NPA Position

The notes do not mention a need for upgrading of the sewage treatment works and Dwr Cymru has confirmed that the local sewerage network can accommodate the foul flows from this site (March 2013).

The latest advice from the landowners is that they desire to progress the site and an advancement on the previous position. There is no evidence to suggest there are no intentions to do so.

Policy 45 of the Local Development Plan and supporting guidance allows for negotiation of the affordable housing contribution where proposals are shown to be unviable. Officers anticipate that one of the outcomes of the current affordable housing Scrutiny Review Committee being carried out by the National Park Authority will be to re-run the Three Dragons Toolkit for sites allocated in the Plan, taking account of any increases in costs since the LDP was adopted. The product of this exercise will be communicated to the relevant landowners and developers in this financial year. The intention is to assist in bringing forward allocated sites in the Local Development Plan.

In order to accommodate the necessary road improvements it is suggested that the 10 units shown in the land supply are moved to 3i.

Suggested change: 0 units in year 5 and 90 units in category 3i.

Site Ref: HA789

Adj Ysgol Bro Dewi, Nun St Comp 0 UC 0 NS 10 Y1 0 Y2 0 Y3 0 Y4 0 Y5 5

5 units in 3i

Landowner/Developer Intentions

Developer/Landowner/Agent Details

Ms Pert and Mrs E Smith

Planning Status

Allocation in the LDP for 10 residential units, 5 to be affordable housing.

Site Constraints

No known constraints

First Year in 5 Year Housing Land Supply

2010

Consultation Response

HBF response: We reiterate our comments from the previous 2 years on this site. The site will require 50% affordable housing which we believe this would impact significantly on development viability and therefore would make the delivery of this site extremely difficult. There is no planning application or developer on board. As such, this site should be moved to 3(i), until we have proof that a developer is on board and intends to develop.

The need to ensure sites are deliverable and genuinely available is particularly pertinent, considering the Minister's recent statement as mentioned above.

NPA Position

Policy 45 of the Local Development Plan and supporting guidance allows for negotiation of the affordable housing contribution where proposals are shown to be unviable. Officers anticipate that one of the outcomes of the current affordable housing Scrutiny Review Committee being carried out by the National Park Authority will be to re-run the Three Dragons Toolkit for sites allocated in the Plan, taking account of any increases in costs since the LDP was adopted. The product of this exercise will be communicated to the relevant landowners and developers in this financial year. The intention is to assist in bringing forward allocated sites in the Local Development Plan.

In light of the lack of interest from the landowners at present agree to move the delivery of the sites to the end of the five-year period.

Proposed change: Year 2 0 units; year 3 0 units; year 4 0 units; year 5 5 units; 5 units in 3i.

ST ISHMAELS

Site Ref: NP/08/60

Land N/O Burgage Green Close

Comp 3 UC 0 NS 2 Y1 0 Y2 2 Y3 0 Y4 0 Y5 0

0 units in 3i

Landowner/Developer Intentions

Developer/Landowner/Agent Details

Planning Status

Full pp for the two dwellings (08/060): Further application for remaining 2 plots submitted June 2013.

Site Constraints

None known

First Year in 5 Year Housing Land Supply 2001	
Consultation Response	NPA Position
	Position agreed.
	No change is suggested.

Site Ref: NP/03/519 **Butterhill Farm**Comp **5** UC **1** NS **0**Y1 **0** Y2 **1** Y3 **0** Y4 **0** Y5 **0**

0 units in 3i

Landowner/Developer Intentions

Former Mansion House under construction. All outbuildings now converted.

Developer/Landowner/Agent Details

Planning Status

Works to restore former mansion house are on-going.

Site Constraints

First Year in 5 Year Housing Land Supply

2004

Consultation Response	NPA Position
	Position agreed.
	No change is suggested.

Site Ref: MA733
Adj to school
Comp 0 UC 0 NS 40
Y1 0 Y2 4 Y3 4 Y4 4 Y5 4
24 units in 3i

Landowner/Developer Intentions

Smaller parcel of land formerly owned by Church sold to private developer who has approached the NPA with initial ideas for development. Agent for remaining land also in contact with NPA re bringing site forward for development.

Developer/Landowner/Agent Details

Mr David Warren-Davies (c/o Mr Roger Anderson and Associates). Vivard Limited.

Planning Status

Allocation in the LDP for 40 residential units, 20 to be affordable housing. Phased for development 2012-17 (16 units) and 2018-2021 (24 units). Awaiting submission of comprehensive layout for consideration through the pre-application process.

Site Constraints

Detailed proposal will need to be screened for likely significant effect under Regulation 48 of the 1994 Habitats Regulations, though the ecological assessment of the site prior to allocation concludes that any effects will be negligible and easily avoided.

First Year in 5 Year Housing Land Supply

2010

Consultation Response

HBF response: Please can the NPA clarify how many homes will be on the small parcel of land purchased by the developer. We believe only these units should be included in the 5 year supply.

NPA Position

It is not clear why the HBF considers this to be the case when the agent for the remaining land is as interested in bringing land forward for development. A meeting with all interested parties is planned for autumn 2013.

The site needs to be considered as a whole. Initial enquiries have suggested up to 22 dwellings on the smaller parcel of land but discussions are ongoing.

No change is suggested.

TENBY

Site Ref: NP/05/407 and NP/08/389 **Guildhall and Glendower House** Comp **21** UC **0** NS **0**

Y1 0 Y2 0 Y3 0 Y4 0 Y5 0

0 units in 3i

Landowner/Developer Intentions

Site complete.

Developer/Landowner/Agent Details

Macob

Planning Status

Site complete.

Site Constraints

None

First Year in 5 Year Housing Land Supply

2006

Consultation Response	NPA Position
	Position agreed.
	No change is suggested.

Site Ref: NP/259/89 HA377

Brynhir

Comp 0 UC 0 NS 168 Y1 0 Y2 0 Y3 0 Y4 10 Y5 10

148 units in 3i

Landowner/Developer Intentions

Developer/Landowner/Agent Details

Pembrokeshire County Council

Planning Status

Allocation in the LDP for 168 residential units, 101 to be affordable housing. Phased for development 2007-11 (30 units) 2012-17 (90 units) and 2018-2021 (48 units). Also allocated in the JUDP and Local Plan (for 120 units).

Site Constraints

Impact on sewerage network and treatment works will need to be assessed. Site access from the A478 will require significant road improvements.

First Year in 5 Year Housing Land Supply 1999

Consultation Response

PCC Response: Requirement for 60% affordable housing and high initial infrastructure costs will make this site unattractive to developers.

HBF response: This site is owned by Pembrokeshire NPA, who have stated that the high affordable housing percentage will make the site unattractive for potential developers. It has remained in the supply since 1999, which is clearly contrary to the TAN. There is absolutely no evidence for any units to be proposed in the 5 year supply and therefore the site should be moved to 3(i).

The need to ensure sites are deliverable and genuinely available is particularly pertinent, considering the Minister's recent statement as mentioned above.

NPA Position

Policy 45 of the Local Development Plan and supporting guidance allows for negotiation of the affordable housing contribution where proposals are shown to be unviable. Officers anticipate that one of the outcomes of the current affordable housing Scrutiny Review Committee being carried out by the National Park Authority will be to re-run the Three Dragons Toolkit for sites allocated in the Plan, taking account of any increases in costs since the LDP was adopted. The product of this exercise will be communicated to the relevant landowners and developers in this financial year. The intention is to assist in bringing forward allocated sites in the Local Development Plan.

No change is suggested.

Site Ref: NP/96/105

Haytor Gardens, Narberth Road

Comp **16** UC **1** NS **0** Y1 **0** Y2 **0** Y3 **0** Y4 **0** Y5 **0**

0 units in 3i

Landowner/Developer Intentions

Last plot under construction.

Developer/Landowner/Agent Details

Ms Rachel Griffiths (applicant 10/549)

Planning Status

Last plot under construction.

Site Constraints

First Year in 5 Year Housing Land Supply 1996

NPA Position
Position agreed.
No change is suggested.

Site Ref: HA723

Former Cottage Hospital Site

Comp 0 UC 0 NS 10 Y1 0 Y2 5 Y3 5 Y4 0 Y5 0

0 units in 3i

Landowner/Developer Intentions

Site acquired by private owner. Pre-application discussions ongoing.

Developer/Landowner/Agent Details

South Meadow Homes Limited

Planning Status

Allocation in the LDP for 10 residential units, 6 to be affordable housing.

Site Constraints

None known

First Year in 5 Year Housing Land Supply

2010

Consultation Response	NPA Position
	Position agreed.
	No change is suggested.

Site Ref: HA724
Rectory Car Park
Comp 0 UC 0 NS 50
Y1 0 Y2 0 Y3 0 Y4 0 Y5 0

50 units in 3i

Landowner/Developer Intentions

Developer/Landowner/Agent Details

Church in Wales

Planning Status

Allocation in the LDP for 50 residential units, 30 to be affordable housing.

Site Constraints

Site is currently a car park and any development may need to retain some public car parking capacity.

First Year in 5 Year Housing Land Supply 2001

Consultation Response

HBF response: We are entirely perplexed at how this site can be proposed in the 5 year supply. It has been in the supply since 2001, which is contrary to the TAN guidance. It will require 60% affordable housing which will impact considerably on development viability. Part of the site will need to be retained for car parking. There is no developer on board and no planning permission.

The site should clearly be moved to 3(i) until we have more substantial evidence that it will be delivered over the next 5 years.

The need to ensure sites are deliverable and genuinely available is particularly pertinent, considering the Minister's recent statement as mentioned above.

NPA Position

Policy 45 of the Local Development Plan and supporting guidance allows for negotiation of the affordable housing contribution where proposals are shown to be unviable. Officers anticipate that one of the outcomes of the current affordable housing Scrutiny Review Committee being carried out by the National Park Authority will be to re-run the Three Dragons Toolkit for sites allocated in the Plan, taking account of any increases in costs since the LDP was adopted. The product of this exercise will be communicated to the relevant landowners and developers in this financial year. The intention is to assist in bringing forward allocated sites in the Local Development Plan.

However, given the lack of interest from the landowner in bringing this site forward for development at the present time it is agreed to take it out of the 5-year land supply.

Proposed change: Remove all units from the 5 year land supply and include them in

category 3i.

Site Ref: HA727

West of Narberth Road Comp 0 UC 0 NS 25

Y1 0 Y2 0 Y3 0 Y4 0 Y5 5

20 units in 3i

Landowner/Developer Intentions

Landowner contacted as part of Land Implementation Study (March 2013). Site being sold by Pembrokeshire County Council to private developer. PCC considers that the developer is purchasing the site as a longer term investment rather than immediate development.

Developer/Landowner/Agent Details

Pembrokeshire County Council

Planning Status

Allocation in the LDP for 25 residential units, 15 to be affordable housing

Site Constraints

First Year in 5 Year Housing Land Supply

2010

Consultation Response	NPA Position
PCC Response: Sale of site to private owner in solicitor's hands.	Position agreed.
	No change is suggested.

Site Ref: HA752

Butts Field Car Park

Comp 0 UC 0 NS 80

Y1 0 Y2 0 Y3 0 Y4 0 Y5 0

80 units in 3i

Landowner/Developer Intentions

Landowner contacted as part of Land Implementation Study (March 2013). Intention to develop in the longer term, driven largely by market conditions.

Developer/Landowner/Agent Details

Pembrokeshire County Council

Planning Status

Allocation in the LDP for 80 residential units, 48 to be affordable housing

Site Constraints

Retention of car parking facility will need to be part of any development of this site.

First Year in 5 Year Housing Land Supply

2010

Consultation Response

PCC Response: Development severely constrained by requirement for 60% affordable housing and replacement car parking. Provision of multi storey is uneconomic therefore alternative site would need to be found and this appears unlikely.

NPA Position

The provision of a multi-storey car park was part of a proposal put forward by Pembrokeshire County Council some years ago. It is suggested that the Council make contact with this Authority to provide evidence about the viability of developing this site. Policy 45 of the Local Development Plan supporting guidance allows and negotiation of the affordable housing contribution where proposals are shown to be unviable.

No change is suggested.

Site Ref: HA760

Reservoir Site

Comp 0 UC 0 NS 12

Y1 0 Y2 0 Y3 0 Y4 0 Y5 0

12 units in 3i

Landowner/Developer Intentions

Landowner of this site is unknown.

Developer/Landowner/Agent Details

Planning Status

Allocation in the LDP for 12 residential units, 7 to be affordable housing

Site Constraints

None known

First Year in 5 Year Housing Land Supply

2010

NPA Position
Position agreed.
No change is suggested.

Site Ref: MA707

White Lion St/Deer Park Comp 0 UC 0 NS 64 Y1 39 Y2 14 Y3 11 Y4 0 Y5 0

0 units in 3i

Landowner/Developer Intentions

Site under construction.

Developer/Landowner/Agent Details

South Terrace Properties

Planning Status

Allocation in the LDP for 74 residential units, 44 to be affordable housing, a hotel, cinema and retail units.

Brought forward as a composite site for residential and commercial uses covering the site of the demolished Gatehouse hotel, the cinema (11/069), and commercial units at Clifton Rock (11/064) and on South Parade (11/065). 12 units at the South Parade site are the affordable housing contribution for the development. This is less than the target percentage in the LDP

owing to the high density of the development and relatively high existing use value. Site works commenced March 2013.

Site Constraints

None known

First Year in 5 Year Housing Land Supply

2010

Consultation Response	NPA Position
	Position agreed.
	No change is suggested.

Site Ref: MA710
Sergeants Lane
Comp 0 UC 0 NS 5
Y1 0 Y2 0 Y3 0 Y4 0 Y5 0
5 units in 3i

Landowner/Developer Intentions

Developer/Landowner/Agent Details

Planning Status

Allocation in the LDP for mixed retail, workshop, and 5 residential units, 3 to be affordable.

Site Constraints

Likely to have significant archaeological interest.

First Year in 5 Year Housing Land Supply 2010

Consultation Response

HBF response: We reiterate our comments from the previous 2 years on this site. The notes say this has been allocated in the LDP for a mixed use development with 5 residential units and 3 to be affordable housing. We believe this would impact significantly on development viability and therefore would make the delivery of this site extremely difficult. The notes also state that the site could have significant archaeological interest, which could compromise the development of the site and adds further uncertainty.

We cannot continue to allow this site to form part of the 5 year supply, particularly given the Ministers comments above.

As such, this site should be moved to 3(i), until we have proof that the site is developable, a developer is on board and intends to develop.

NPA Position

Agree that this site can be moved to 3i in the absence of communication from the owners/developers.

Proposed change: Yr5 0; 3i 5

Site Ref: NP/07/218, NP/08/120 and NP/09/064

Fountains Cafe
Comp 6 UC 6 NS 0

Y1 0 Y2 0 Y3 0 Y4 0 Y5 0

0 units in 3i

Landowner/Developer Intentions

Site being developed. Phase 1 complete.

Developer/Landowner/Agent Details

Planning Status

Planning permission for 19 units. Offsite provision of affordable housing units – see separate site

Site Constraints

None known.

First Year in 5 Year Housing Land Supply

2012

Consultation Response	NPA Position
	Position agreed.
	No change is suggested.

Site Ref: NP/09/064

Fountains Café Affordable Site

Comp 0 UC 0 NS 5

Y1 0 Y2 5 Y0 0 Y4 0 Y5 0

0 units in 3i

Landowner/Developer Intentions

Developer/Landowner/Agent Details

Planning Status

Off site affordable housing contribution for Fountain's Cafe site. Main site under construction and permission conditioned to ensure provision of affordable units prior to occupation of the market dwellings.

Site Constraints

Likely to have significant archaeological interest.

First Year in 5 Year Housing Land Supply

2010

Consultation Response	NPA Position
	Position agreed.
	No change is suggested.

THE RHOS

Site Ref: NP/05/331

Picton Home Farm

Comp 0 UC 0 NS 8

Y1 4 Y2 4 Y3 0 Y4 0 Y5 0

11412413014

0 units in 3i

Landowner/Developer Intentions

Technical start made, but no recent activity on site.

Developer/Landowner/Agent Details

Picton Estate

Planning Status

Permission 05/331 for conversion to dwellings.

Site Constraints

No known constraints

First Year in 5 Year Housing Land Supply 2007

Consultation Response

HBF response: This site has an extant planning permission yet there has been no progress made. There is no developer on board and no developer interest. As we stated over the last 2 years, this site should be moved to 3(i) until we have more proof that it will be developed over the next 5 years.

The need to ensure sites are deliverable and genuinely available is particularly pertinent, considering the Minister's recent statement as mentioned above.

NPA Position

The site has been sold and the developer has commenced conversion of the properties.

Proposed change: In order to reflect the up-to-date position – Y1 4 units, Y2 4 units.

TREFIN

Site Ref: HA738

North of Heol Crwys

Comp 0 UC 0 NS 15

Y1 0 Y2 0 Y3 0 Y4 0 Y5 0

15 units in 3i

Landowner/Developer Intentions

Developer/Landowner/Agent Details

Planning Status

Allocation in the LDP for 15 residential units, 8 to be affordable housing. Phased for development 2012-17 (10 units) and 2018-21 (5 units).

Site Constraints

None known

First Year in 5 Year Housing Land Supply 2010

Consultation Response

HBF response: We reiterate our comments from the previous 2 years on this site. The notes say this has been allocated in the LDP for 15 units with 8 to be affordable housing. We believe this would impact significantly on development viability and therefore would make the delivery of this site extremely difficult. As such, this site should be moved to 3(i), until we have proof that a developer is on board and intends to develop.

The need to ensure sites are deliverable and genuinely available is particularly pertinent,

NPA Position

Policy 45 of the Local Development Plan and supporting guidance allows for negotiation of the affordable housing contribution where proposals are shown to be unviable. Officers anticipate that one of the outcomes of the current affordable housing Scrutiny Review Committee being carried out by the National Park Authority will be to re-run the Three Dragons Toolkit for sites allocated in the Plan, taking account of any increases in costs since the LDP was adopted. The product of this exercise will be communicated to the relevant landowners and developers in this

considering the Minister's recent statement as mentioned above.

financial year. The intention is to assist in bringing forward allocated sites in the Local Development Plan.

However, given the lack of interest from the landowner in bringing this site forward for development at the present time it is agreed to take it out of the 5-year land supply.

Proposed change: Remove all units from the 5 year land supply and include them in category 3i.

UZMASTON

Site Ref: NP/04/400 **Boulston Manor** Comp 0 UC 0 NS 5 Y1 2 Y2 2 Y3 1 Y4 0 Y5 0

0 units in 3i

Landowner/Developer Intentions

Applicant has implemented sufficient of the permission to preserve the consent but no recent activity on site. Owner contacted June 2013 re intentions for site and advised that he hopes to complete some of the units in 2014.

Developer/Landowner/Agent Details

Mr, R, Thomas, c/o Morgan K, The Studio

Little Greenway

Planning Status

Full permission 04/400 for conversion of barns to 5 dwellings.

Site Constraints

None known

First Year in 5 Year Housing Land Supply

2006

Consultation Response	NPA Position
	Position agreed.
	No change is suggested.

WHITCHURCH

Site Ref: 05/509

Rear of Caeglas & Llygod yr Haul

Comp 2 UC 0 NS 3

Y1 0 Y2 1 Y3 2 Y4 0 Y5 0

0 units in 3i

Landowner/Developer Intentions

Estate road built, services to each plot in. For sale as serviced plots.

Developer/Landowner/Agent Details

Planning Status

Outline permission for 5 units (05/509). Full permission on two of these (10/074 & 10/384). Two units built. Permission refused for Plot C (NP/12/0576) February 2013 for design reasons.

Site Constraints None known First Year in 5 Year Housing Land Supply 2006	
Consultation Response	NPA Position
	Position agreed.
	No change is suggested.

Appendix 3 – Agreed Minor Changes/Amendments

- 1. Adjacent to Landway Farm, Jameston as landowner has advised that 2 plots are now under construction, HBF has withdrawn their comments and agree with the forecasted completions as set out in the draft proformas.
- **2. West of Glasfryn Lane, St Davids** agreed that all units should be removed from the 5 year land supply and included in category 3i.
- **3. Rectory Car Park, Tenby** agreed to move all units from the 5-year land supply and include in category 3i.
- **4. Sergeant's Lane, Tenby** agreed to move all units from the 5-year land supply and include in category 3i.
- 5. Picton Home Farm, The Rhos the National Park Authority has been advised that the site has been sold and work has commenced on conversion of the properties. HBF has agreed with revised 5-year land supply forecast as set out in the site proformas.
- **6. Former Hospital Site, Tenby** site details amended to advise that the developer is South Meadow Homes Limited.