

REPORT OF THE HEAD OF DEVELOPMENT PLANS

SUBJECT: RESPONSE TO THE DRAFT SUPPLEMENTARY PLANNING GUIDANCE TO THE PEMBROKESHIRE COAST NATIONAL PARK LOCAL DEVELOPMENT PLAN ON AFFORDABLE HOUSING

Purpose of Report: The purpose of this report is to advise Members of the response received on the above consultation and to ask Members to adopt the guidance for development management purposes subject to the Officer recommended changes.

Background: This Supplementary Planning Guidance was approved for public consultation by the National Park Authority on 29 September 2010. The consultation began on 6 October 2010 and ended on 7 January 2011 at 5pm.

An estimated 400 letters were sent to various consultees. These included Agents, Architects, Town and Community Councils within the Park, Housing Associations, Estate Agents, Developers, Local Community Groups, local AM's and MP's, County Councillors, Utilities, Chambers of Trade, Environmental Groups, Government agencies, and other people who had expressed an interest.

Letters and paper copies of the consultation documents were provided to libraries within Pembrokeshire, St Clears and Cardigan. They were also available at the National Park centres in Newport, St David's and Tenby. Paper copies of the documents were available to view at the National Park Offices in Llanion Park, Pembroke Dock.

The consultation was advertised via the Authority's web site and via a public notice within the Western Telegraph which appeared in the 6th October 2010 edition along with a press release. The Western Telegraph also printed an article on the affordable housing contribution, which added to the publicity.

To further assist with understanding affordable housing within the National Park, the Authority held a series of 'surgery' sessions throughout the County between November and December 2010. These enabled people to drop in and discuss queries with planning officers. The Rural Housing Enabler was also in attendance at these sessions. The sessions were held in St Davids, Newport, Milford Haven, Tenby, and at the National Park Authority offices in Pembroke Dock.

To assist Members 3 workshops were held, 24 November, 2010, 12 January, 2011 and 9 February 2011.

A total of 23 individuals and organisations responded. 121 individual comments were made.

Main issues: The main issues raised by the consultation are set out and responded to in Appendix A. Appendix B provides a detailed printout of the representations made and Officer recommended responses. Appendix C sets out some Officer recommended edits. Appendix D shows all the resultant proposed changes to the draft Supplementary Planning Guidance. It is a working draft.

Recommendation

That the Affordable Housing Supplementary Planning Guidance to the Pembrokeshire Coast National Park Local Development Plan be adopted for development management purposes subject to the amendments set out in Appendix A, B and C.

Background Documents

Pembrokeshire Coast National Park Local Development Plan Adopted September 2010
Draft Supplementary Planning Guidance on Affordable Housing September 2010
Technical Advice Note 2 Planning and Affordable Housing June 2006
Technical Advice Note 6 Planning for Rural Communities July 2010
Planning Policy Wales Edition 4 February 2011
Responses to the Affordable Housing Supplementary Planning Guidance consultation

(For further information, please contact Martina Dunne on ext 4820)

Appendix A: Affordable Housing Supplementary Planning Guidance Main Issues and Proposed Response

This report provides a summary of comments made and an Officer response.

1. Is the guidance clear and easy to understand? Please indicate anything that is unclear.

Answer	Number of respondents
Yes	3
Clear subject to/but	3
Not clear	2
Response not related to the question	3
Total Responses	11

1.1 Most of those who responded directly to the question felt the guidance was clear or mostly clear subject to some change.

1.2 In summary there were issues raised about:

- the affordable housing contribution
- the use of acronyms
- the need for a summary sheet
- points of detail and accuracy
- the guidance is unnecessary and contrary to national planning policy
- the definition of who is eligible for affordable housing should take account of individual circumstances

Officer Response:

1.3 The **affordable housing contribution** issue is dealt with under Question 3. Amendments to address the use of **acronyms** and issues regarding clarity and accuracy are also proposed. The forthcoming Validation Guidance will be used to provide a **summary** of requirements. The guidance has been drafted in line with **national planning policy** and is a requirement of the adopted Local Development Plan. The **definition of who is eligible for affordable housing** is set out in the guidance in section 16. It would be against that standard that an individual's circumstances would be tested.

2. Is the guide to submitting a planning application, on page 16 clear and easy to understand?

Answer	Number of respondents
Yes	6
Clear subject to/but	3
Not clear	1
Response not related to the question	1
Total Responses	11

2.1 Most of those who responded directly to the question felt the guidance was clear or mostly clear subject to some change.

2.2 In summary there were issues raised about:

- the need for agents to be involved with assisting applicants
- the procedure being bureaucratic
- the ability of registered social landlord to commit to projects

Officer Response:

2.3 In all respects the submission of planning applications is becoming more complex. It is hoped that the guidance is providing **assistance** with that process. The Authority also encourages pre-application discussions which should make the planning application process smoother. The forthcoming Validation Guidance should also assist. Officers are

also available to provide advice. It is becoming more difficult for **Registered Social Landlords** to secure Social Housing Grant. However the guidance does offer an alternative rent option which is not as reliant on Social Housing Grant. This may ease the process of securing commitment.

3. Do you agree with the Authority's method for calculating commuted sums on proposals for single dwellings? If not can you suggest an alternative approach?

Answer	Number of respondents
Yes	1
No not as it is/Maybe if	7
No	7
Specific point or query raised	2
Total Responses	17

3.1 This issue was the most commented on in the consultation. Of those who answered the question directly the response suggests that just under 50% were objecting in principle to the proposal and just over 50% could find it acceptable if the approach was changed or were in full agreement (1 respondent).

3.2 The main issues are responded to here. Points of detail are covered in the individual responses report in Appendix B. The main issues were:

- Is the proposal contrary to national planning policy? Is it legal?
- Is there an easier more progressive way to calculate the sum?
- Where will the funding be spent?
- Who will pay? It is unfair on individuals.
- Clarify what the exemptions are.
- It will be a barrier to development? Will it stagnate development?
- Will there be Park Authority legal fees?

Officer Response:

3.3 **National Policy:** The policy is consistent with Welsh Assembly Government Guidance that states "In principle all new market housing may contribute to meeting the need for affordable housing" (Planning Policy Wales paragraph 9.2.16). The policy has been through an examination in public.

3.4 **How to calculate:** Commentators have suggested that the Authority consider using alternative approaches such as a percentage of open market house prices, a charge per square metre or a charge per bedroom or number of habitable rooms. Using a flat rate was not popular.

3.5 Following consideration of the representations received and an exploration of experiences elsewhere with Members at recent workshops it is proposed that an affordable housing contribution of £250 per square metre of the proposed dwelling be introduced¹. To ease transition it is proposed that the contribution has a phased introduction. From 1st October 2011 the contribution will be £100 per square metre. This will rise to £150 on the 1st October 2012 and finally from the 1st October 2013 it will be £250. The figure uses Acceptable Cost Guideline figures and will require updating after 2013 as new Acceptable Cost Guideline figures are published.

3.6 The contribution will be required as a condition of the permission granted and will be required to be provided prior to first occupancy. This approach would be simple to use, the figure could be readily updated annually or as and when the Accepted Cost Guidelines

¹ This is based on the assumption that a charge of £250 per square metre of a reasonably sized market house would be capable of subsidising 30% of the Acceptable Cost Guideline cost of constructing a 2 bedroomed 3 person affordable house.

changed and the approach in principle is considered viable. The approach would be comparable with that taken on larger sites.

- 3.7 **Spend on and where to spend:** A key objective of the Plan is to aim to meet the housing needs, in particular, affordable housing needs of the National Park without compromising National Park purposes (page 16 of the Local Development Plan). This means that with a limited housing land supply significant demands are made on what little land is capable of development to enable delivery of affordable housing. Wherever possible the Authority is aiming to meet affordable housing need locally and this means that every opportunity should be taken to support this strategy.
- 3.8 Single unit developments are potentially limited in number (15 per year²) and therefore the affordable housing contributions gathered from these developments should be used within the National Park wherever possible. Otherwise this does not represent judicious use of the money received to achieve the intended objectives of the Plan.
- 3.9 Where contributions are used they should be properly accounted for. Also the Authority should only be seeking these funds if there is a clear and immediate benefit in terms of widening affordable housing supply for those in housing need in the National Park. Given the limited amounts in question and the limited opportunities there will be to spend then onerous administration and restrictions on spend should be avoided.
- 3.10 In the first instance it is suggested spend should be restricted to the local Community Council area and land within adjacent Community Councils which lies within the National Park. Any land in these Community Councils which lies outside the National Park would be excluded.
- 3.11 If the money is not spent within 3 years in the local area (as defined in the previous paragraph) the money should be made available to spend on the delivery of affordable housing in the remainder of the Community Council and adjacent Community Council area if outside the National Park³. This would acknowledge the fact that there are some split settlements where it would be reasonable to allow spend in the same locality to meet the need. If not spent within 5 years then it should be returned to the applicant. The money should be held by the Housing Authority, as current affordable housing contributions are. Setting up a separate administrator would be unnecessary. It should be kept for the provision of affordable housing generally. Finally, the County Council's S106 Monitoring Officer would monitor gathering and spending of the funds.
- 3.12 **Fairness:** This proposal must be looked at in the context of the demands the planning authority is making on larger proposals, i.e., 50% affordable on two or more units. To not require a contribution from single dwellings would be unfair to others developing larger sites. The proposal is not a surcharge but a cost on the development which will reduce the residual value of the plot.
- 3.13 **Exemptions:** Following comments received it is suggested that the following exemptions apply/be made explicitly clear in the guidance:
- Affordable housing for local people as defined in the supplementary planning guidance
 - Replacement dwellings.
 - Accommodation limited in its occupation by condition or legal agreement, for example as an agricultural worker or managers dwelling or self catering accommodation.

² Analysis of recent single unit developments would suggest that around 50% have the characteristics of being constructed for developer/landowner profit or they were not built to house those living locally with affordable housing needs.

³ Excluding the main towns of the County, Haverfordwest, Milford Haven, Pembroke/Pembroke Dock, Neyland, Fishguard & Goodwick.

- If removal of an occupancy condition is sought⁴, and the Authority is minded to allow full residential use, then this will only be approved if it is replaced by an appropriate affordable housing contribution condition⁵.

3.14 **Barrier to development:** Given the exemptions listed above the proposal is likely to apply to a very limited number of single residential unit developments. It is also proposed that introduction of the contribution is delayed and phased.

3.15 **Legal fees:** It will be required by planning condition. No legal fee will be required.

4. Do you agree with the Authority’s approach to calculating a price for low cost homes? If you do not agree with this approach please suggest an alternative.

Answer	Number of respondents
Yes	5
No	3
Yes/maybe but	3
Response not related to the question	2
Total Responses	13

4.1 The majority of those who responded directly to the question supported the approach set out.

4.2 In summary the main issues raised were:

- Is it an easy calculation to make?
- This is another tax on development
- Why set a price when all you need to do is restrict occupancy?
- Can the Authority run training seminars on the processes?
- Remove the market price caps. Can you not expect individuals to raise a deposit?

Officer response:

4.3 **Easy Calculation:** The figures for Acceptable Cost Guidelines are readily available. **Taxation point:** The approach is to ensure that new market housing can cross subsidise the delivery affordable housing. This is the policy of the Welsh Assembly Government and there is insufficient public subsidy to support a building programme to address affordable housing need. **Local needs policies** are not permitted under national planning policy. Once the guidance is agreed the Authority needs to consider how to tackle implementation and **seminars** may well assist. **Market Price Caps:** The approach set out aims to target those in need of affordable housing unable to find housing on the open market. The pricing reflects the gap between local wages and the price of housing at the lower end of the open market but liveable. It cannot be expected/required that a couple will have a deposit.

5. Do you agree with the cascade approach to ensuring that affordable housing does not remain vacant for long periods? If not, please suggest how you think it should be changed?

Answer	Number of respondents
Yes	4
Yes subject to	2
Not agree	4

⁴ Please note that Technical Advice Note 6; Planning for Sustainable Rural Communities, July 2010 provides for an occupancy condition for a rural enterprise dwelling which includes the possibility of it either being occupied by a rural enterprise worker or if there are no such eligible occupiers then to those in need of affordable housing (paragraph 4.13.1). It also advises at paragraph 4.13.5 that where authorities are minded to remove existing agricultural occupancy conditions then they could be replaced with a rural enterprise condition.

⁵ (including a rural enterprise occupancy condition)

Specific issue raised	1
Total Responses	11

5.1 Those who responded directly to the question felt the cascade was acceptable or more or less acceptable subject to some change.

5.2 In summary these issues were raised:

- Tighten the cascade/loosen the cascade
- Affordable housing should only be for local need
- This is not the responsibility of the National Park Authority
- Add rural enterprise workers
- Allow properties to be sold on the open market if not sold within a year

Officer Response:

5.3 **Cascade:** The cascade included in the guidance is that which both Authorities have operated under the Joint Unitary Development Plan in terms of timing. To **tighten or loosen** it would mean that the approach would not be the same as that used in the wider County Council area. The need to aim for continued consistency with the Council's approach will mean that Officers here will need to liaise further with Council Officers. Officers at the Council will be unlikely to be recommending on the cascade until June 2011 (the Council's affordable housing supplementary planning guidance is currently out for consultation). It is proposed that the Authority continues to operate the approach currently being used, i.e., that set out in the Joint Unitary Development Plan Supplementary Planning Guidance. Officers will report back to Members once the position with the County Council is clearer.

5.4 **Occupancy controls:** In terms of occupancy controls for local need the Guidance goes as far as planning can go. The Guidance includes:

- controls on the occupancy of private developments whether they are low cost home ownership properties or privately rented properties
- The Authority's desire to secure voluntary lettings agreements with all Registered Social Landlords developments.

5.5 **Enterprise workers** could qualify as those with employment in the locality.

5.6 **Who is responsible:** The need for planning authorities to use cascades is set out in Technical Advice Note 2 on Affordable Housing paragraph 12.7. They have been drafted in consultation with the Housing Authority and Registered Social Landlords. Cascade provisions are already in operation in Section 106 agreements. In practice this Authority relies on the Housing Authority's advice and support as to whether the cascade provisions have been complied with in terms of properties. The cascade provisions have been written to ensure that long term vacancies will not occur. Please also see Officer Response under Question 6.

6. **Do you agree we should use the same definition for local and housing need as the housing authority?**

Answer	Number of respondents
Yes	7
Yes subject to	1
No	2
Specific issue raised	2
Total Responses	12

- 6.1 Those who responded directly to the question felt the using the same definition was acceptable or more or less acceptable subject to some change.
- 6.2 In summary the following issues were raised:
- The 'local area' should not relate to the whole County
 - Those with local connections who are away should be included
 - Include those on a temporary contract
 - Refer to the immediate community rather than 'sustainable community'
 - Add the Welsh language as a scoring factor
 - Lengthen the years of residency

Officer Response:

- 6.3 These definitions are taken from the Council's housing allocation policy and this is currently under review. The Authority should aim for a consistent approach. However, it is unlikely that the Council's allocation policy will be finalised before June 2011. Officers will need to liaise with Council Officers regarding the proposed approach to housing allocations policy and will report back to Members in due course on this issue. In the interim, it is proposed to continue with the approach set out the Joint Unitary Development Plan Supplementary Planning Guidance. However, as 'Sustainable Communities' are no longer a valid concept under the Pembrokeshire Coast National Park Local Development Plan reference will be made to Community Council areas instead.
- 6.4 In terms of the issues raised I would suggest we ask the Council to consider (in their review of the allocations policy):
- To ensure consistency, the **local area** definition to be the same as that contained in the draft Pembrokeshire County Council affordable housing supplementary planning guidance (i.e., in the first instance the occupier will have a connection to the town or community council where the property is located or any adjoining town or community council area to that in which the property is located, including in neighbouring local planning authority areas). This would be an acceptable approach to take in the National Park Authority's supplementary planning guidance as well.
 - To include bullet 3 of the Local Person criteria contained in the Joint Unitary Development Plan Supplementary Planning Guidance: 'Applicants who have previously lived in the (local area to be defined) with their family, for at least five years, and have a parent or close family member (child, brother or sister) who still live in the local area.' This would mean that 'people with a family connection or longstanding links with the local community' as referred to at paragraph 10.16 of Technical Advice Note 2 Planning and Affordable Housing, June 2006 would be included.
- 6.5 With regard to people living locally but not on full time contracts they may still be eligible for affordable housing being local if they have lived in the area for the past 12 months and in need, for example if they are in rented accommodation. The offer of a **temporary contract** does appear to be a tenuous link.
- 6.6 In terms of including the **Welsh language** adding Welsh language as a score would not be appropriate given the differences in proportion that speak Welsh across the County.
- 6.7 In terms of **lengthening the years of residency** when deciding on what occupancy criteria to use the Authority has to consider whether the right balance is being struck between the legitimate aims of the policy and any discriminatory effect it might have. For example, the question that would need to be asked is whether those who have lived here for 1 year have less of a need for an affordable house locally than those that have lived there for 15 years.

It is considered that there are no obvious grounds⁶ where this Authority could be more discriminatory than the Council in its approach. The approach taken will also need to be continuously monitored as new housing needs surveys are undertaken and the Common Housing Register updated to ensure a reasonable approach is taken. It is suggested that the following text be inserted at paragraph 8.7. 'The Authority may also alter the occupancy criteria used and the cascade to ensure that an appropriate and fair balance is struck between the legitimate aim to be served by affordable housing policies to meet local need, and the effects on those who are excluded from the policy.'

7. Are there any other methods of delivering affordable housing that you think should be highlighted in the guidance?

7.1 The majority of responses were to suggest additional mechanisms:

- Allocate land in our ownership/the Council's ownership that are surplus to requirements for affordable housing
- Support community land trusts
- Housing Association/National Park Authority should release more land and build more
- Encourage zero vat on renovating empty properties for affordable housing
- Tax those who profit from the tourism industry
- Allow live work units and one planet developments
- Make exceptions sites easily available
- Use all the methods in Technical Advice Note 2 and Technical Advice Note 6

Officer Response:

7.2 This Authority has extremely limited opportunities for delivering affordable housing **on sites surplus for requirements** but would seek to deliver affordable housing where this is considered appropriate for those sites. The suggestion for **zero VAT** is a good one but not one this Authority can activate. **Taxing** the tourism industry is beyond the Authority's control as well. **Live work units** and **one planet developments** are allowed under the Local Development Plan. In a National Park the release of **exceptions sites** is not straight forward and finding a suitable site is often difficult. Also landowners aspirations can be difficult to overcome. The guidance take account of mechanisms contained in **Technical Advice Note 2** and reference can be made to opportunities arising through the new **Technical Advice Note 6**.

8. Have you any suggestions or comments that you would like to add to your response?

8.1 Many comments were submitted and are responded to in Appendix B.

⁶ The use of the 3 year residency rule for the Right to Acquire cannot be used to support a more stringent position here. Paragraph 13.2 of Technical Advice Note 2 Affordable Housing advises that 'the existence of this right (the Right to Acquire) should not be used as a reason to impose additional occupancy controls where a registered social landlord is involved.'

Appendix B

Representations received during consultation on SPG on Affordable Housing, with officer responses, grouped by consultation question

Question 1: Is the guidance clear and easy to understand? Please indicate anything that is unclear.

2416 Mr Graham Warrilow

What is the legislation which might allow the Authority to request £30,000 from a single development toward Affordable Housing what happens if a developer refuses to pay - it cannot be used as sole reason for refusal - S106 does not apply.

Officer Response

Paragraph 9.2.16 of Planning Policy Wales advises that commuted sums may be used to meet affordable housing need. It further advises that, in principle, all new market housing may contribute to meeting the need for affordable housing. The principle of imposing an affordable housing contribution was also established in the Local Development Plan which is now adopted. It could potentially, if reasonably sought and is not provided, be the sole reason for refusal of a planning permission. This requirement can be a condition on the permission and therefore legal costs are not incurred.

2903 Mr W Hall, Nolton & Roch Community Council

Yes

Officer Response

Noted.

2916 Mr Andrew Davies, Tenby Town Council

Members felt that the guidance was unclear for a layman as it relies very heavily on use of acronyms.

Officer Response

The glossary should include an explanation of all technical references and acronyms deleted. Agree to double check the document and amend as necessary.

3291 Mr Andrew Vaughan-Harries, Hayston Developments & Planning

At 34 pages the general public and some professionals will perhaps be confused with all the matters discussed. I think a summary sheet to go out with planning applications forms would be useful. However the document is well written.

Officer Response

Noted. The Validation Supplementary Planning Guidance when finalised will be the overall starting point and include a summary of provisions.

3368 Mr & Mrs AR & VS Ash

Yes, reasonably clear.

Officer Response

Noted.

3756 Mr James Dwyer, James Dwyer Associates

yes

Officer Response

Noted.

4123 Mr & Mrs C & H Platel

We have been given information regarding this through a planning consultancy that we have employed therefore all information we receive has been interpreted by them.

Officer Response

Noted.

4126 Mr T Marmara, T M Design (Carne) Ltd

Generally yes however until examples are carried out full understanding will not be possible.

Officer Response

Noted.

Yes, see below for some changes.

3.5 not entirely true – properties given to RSL's with no SHG paid back will still be rented out by RSL's at benchmark rents. If SHG is used, they do currently have to be at benchmark, but this may change with proposals being looked at by the WAG to only provide 25% cost through SHG but allow intermediate rents to be charged. May be better to state 'Social rented is managed by RSL's or Local Authorities. Properties built or purchased with grant support (SHG) currently have to be rented at rent levels set by the WAG known as benchmark rents. They are below market rents.'

3.6 final sentence could probably come out, given the above.

4.4 refers to 'centres' – earlier they are 'Centres'

Between 6.1 and 6.2 there is an extra gap.

8.1 After Common Housing Register it says can 'apply' – this needs to say 'bid'

8.2 lack of consistency over title case or not for 'Housing Authority' and 'Common Housing Register' in the doc.

10.7 consistency over using 'SPG' or 'Supplementary Planning Guidance'

11. step 9. if a property is transferred to an RSL they will use the ChoiceHomes@Pembrokeshire allocation policy to find a tenant. Nominations would apply where it is another management company.

16. 1st main para should read 'The criteria for assessing accommodation need are set out in the ChoiceHomes@Pembrokeshire Allocation Policy'. Replace the last sentence with 'Those who are registered on the common housing register are able to bid for properties that become available and the household with the highest need will be offered the property'. N.b. those in bronze may still be able to get social housing provided no-one in a higher banding bids for it.

16. page 25 – 1st para – RSL's do have a local person requirement for a certain percentage of their lets so you could probably delete the first sentence and amend the second sentence to say 'The ability of RSL's to house.....'

16. page 25 – note that its not just our allocations policy, call it the ChoiceHomes@Pembrokeshire Allocation Policy. what qualifies someone to be in gold or silver is likely to change soon following a review of the allocations policy – I don't know whether its worth putting some wording in about this being subject to change?

16. page 26 – we do not have a financial need requirement to be eligible for social housing, however we do have an assessment of financial ability to pay for low cost home ownership and we are likely to introduce a financial test for intermediate rented.

Officer Response

3.5 - It has been necessary to re-write this paragraph and these references are no longer included.

3.6- This paragraph is proposed for deletion.

8.1,16 1st main paragraph, 16 page 25 comments - Agree amendments as suggested including the fact that the 'ChoiceHome@Pembrokeshire' Allocation Policy is currently (Jan 10) subject to review.

4.4 comment - ensure all references are to 'Centres'

6.1, 8.2, 10.7 - Agree formatting changes

Para 11, Step 9 comment - Clarify as set out in the representation. Also include a reference to Voluntary Lettings Agreement.

16, Amend the second last paragraph on page 26 as set out below: 'If a household is assessed as being on high or medium priority accommodation need i.e. in the gold and silver band on the common housing register then the housing authority may, depending on the type of affordable housing sought, have to do additional financial assessments. This can include assessing whether the household can afford to resolve its situation without subsidy or assistance or ensuring that applicant has sufficient money to pay for the option chosen. The ability to resolve affordability issues on the open market will depend on the relationship between the amount that the household is able to afford and the cost of appropriate local housing. Appropriate local housing is housing in the locality that can be moved into and lived in comfortably without the need for extra capital expenditure. The Authorities will use information on appropriate housing availability(insert footnote 15 as per draft Supplementary Planning Guidance) and pricing (normally at a localised level such as Community Council areas).

Affordability will be checked by using the standard mortgage industry 'income multiplier'. This multiplier will be reviewed regularly and amended as necessary in consultation with the Council for Mortgage Lenders.

4130 Mr Adrian Lort-Phillips, Lawrenny Enterprises Ltd

No: Its effect is to change and confuse all previous national guidance on the provision of affordable housing (see comments at section 7&8 below). In the light of previously adopted guidance it is also unnecessary. Adequate policies to secure affordable housing already exist. There is no clear evidence to justify separate guidance documents for the PCC and PCNPA. It simply adds a further bureaucratic burden.

Officer Response

See response to more detailed comments referred to above as comments at section 7 & 8. Supplementary Planning Guidance has to be prepared to support the Authority's new Local Development Plan which contains new policies on affordable housing provision. The Guidance was drafted by this Authority for use by both Pembrokeshire County Council and the Authority. Pembrokeshire County Council has tailored the guidance to suit their particular circumstances. Given the timescale for the progression of the County's Local Development Plan (it has been delayed) this Authority will necessarily need to finalise its guidance now.

4131 Ms Linda Jones, Acanthus Holden

How will you define 'households building a dwelling to meet their own affordable need'?

Officer Response

The Authority can only consider generic affordable housing provisions as set out in the Supplementary Planning Guidance.

Question 2: Is the guide to submitting a planning application, on page 16, clear and easy to understand?

2416 Mr Graham Warrilow

Yes

Officer Response

Support noted.

2903 Mr W Hall, Nolton & Roch Community Council

Yes

Officer Response

Noted.

2916 Mr Andrew Davies, Tenby Town Council

Yes

Officer Response

Noted.

3291 Mr Andrew Vaughan-Harries, Hayston Developments & Planning

Yes but professionals in the development process will need to be employed as submissions for housing in the PNCP are getting too complicated for the general public

Officer Response

Noted. Roughly 50% of applications are now submitted with agents.

3368 Mr & Mrs AR & VS Ash

Yes

Officer Response

Noted.

3756 Mr James Dwyer, James Dwyer Associates

Yes

Officer Response

Noted.

4123 Mr & Mrs C & H Platel

Again we have not been involved in this part, we are being advised.

Officer Response

Noted.

4126 Mr T Marmara, T M Design (Carne) Ltd

Procedure is easy to understand but I suspect in practise it will become a bureaucratic nightmare.

Officer Response

Noted.

4129 Mr Andrew Davies-Wrigley, Pembrokeshire County Council

Yes

Officer Response

Noted. Please see Appendix A under Question 3 for further discussion on affordable housing contributions.

4130 Mr Adrian Lort-Phillips, Lawrenny Enterprises Ltd

No.

Officer Response

No advice is given as to how it could be improved. No change proposed.

4131 Ms Linda Jones, Acanthus Holden

Yes but there is a fundamental problem in agreeing getting a RSL to agree to purchase and the price and price when due to the budget regime they work with it is very difficult for them to commit. Also time is a big factor. When will the site be developed and when will the affordable housing need to be developed is a huge factor very much linked to the state of the economy.

Officer Response

These are difficult times for Registered Social Landlords. In Pembrokeshire there has been a willingness to co-operate and no Registered Social Landlord has yet failed to commit to a proposal albeit many are still permissions to be implemented. The proposal for providing without the benefit of Social Housing Grant should also give the Registered Social Landlords flexibility. The figures in the guidance are those provided by the Registered Social Landlords as being those they can work with.

Question 3: Do you agree with the Authority's method for calculating commuted sums on proposals for single homes, on page 15? If not can you suggest an alternative approach?

2025 Mr Richard Price, Home Builders Federation

2. Paragraph 4.1 – Commuted Sum Requirement

This paragraph states that on proposals for one home a developer will be required to pay a financial contribution of £30,000 to provide affordable housing, known as a commuted payment. We object to this requirement as it has not been tested in terms of its impact on development viability and we believe it will severely affect the ability of people to provide housing on sites below 2 units.

National Guidance is clear in its requirements on local authorities and National Parks on the need to take account of development viability. The NPA are acutely aware of this given that they attempted to undertake a viability assessment of the LDP policy which was subject to scrutiny at the LDP Examination. However, this particular requirement did not feature as part of the viability assessment and also does not feature within the recently adopted LDP policy. We understand that National Guidance allows for commuted sums to be secured on developments below adopted thresholds, but these requirements MUST be subject to viability testing in order to ensure they are capable of being delivered. As we have stated above, this requirement for a developer to pay a financial contribution of £30,000 on developments of one home has not been tested to ascertain its impact on development viability and therefore, the requirement is directly contrary to national guidance and is also not based on robust and credible evidence. If this particular requirement were submitted for Examination in this respect, it would have contravened Soundness Test C2 and CE2 and the Inspector would most likely have deemed the requirement inappropriate and unsound. In light of this, given that the NPA are fully aware of the need to test affordable housing policy requirements with respect to their potential impact on development viability, we cannot understand why the NPA has proposed the adoption of such an onerous policy requirement without carrying out the necessary tests to ensure it is viable. It is clear that if the policy requirement proves not to be viable, it will in effect stop all development of single dwellings within the National Park, which would have a severe impact on not only on the ability for people to provide homes for their families, but also on the level of housing supply the National Park secures from this particular type of development. Therefore, given the potential damage this policy could have on the provision of single homes within the NPA, we believe the policy requirement should be removed and a proper assessment of the impact on development viability must be undertaken, before any similar policies are considered.

2.1 Suggested Change

In light of the comments above, we believe the requirement for a developer to pay a financial contribution of £30,000 on developments of one home is inappropriate and unsound due to the following:-

- It is contrary to National Guidance on the appropriate creation of affordable housing policies
- It has not been tested in terms of its impact on development viability; and
- It is likely to have a severe negative impact on the provision of housing from this type of development.

As such, the requirement must be removed.

Officer Response

See Appendix A, under Question 3 for a discussion on the way forward regarding an affordable housing contribution. The principle of applying such a sum is set out in the adopted Plan and is consistent with Planning Policy Wales paragraph 9.2.16. Viability can be considered and is not precluded.

2416 Mr Graham Warrilow

No, can't agree the method because the whole concept is not allowed by law, some like the idea.

Officer Response

This is an objection in principle which should have been submitted on the Local Development Plan consultation. See also the Officer Response to comments made under Q1.

2873 Mrs Shirley Goldsworthy, Angle Community Council

We also have concerns over what will become of the money raised from the development of individual plots as there is no indication of where, when, by whom or how the money will be spent. It was considered by some to be unreasonable for commuted sums raised in a community not to be spent for the benefit of that community. There was uncertainty expressed whether the proceeds of commuted sums will be used more generally to finance schemes where SHG will fail to satisfy the local demands as mentioned above and where there is no opportunity of suitable affordable dwellings becoming available as part of multiple developments. The document fails to address this important aspect as there is inadequate explanation of how this levy will be made available to contribute to the provision of affordable housing to satisfy indigenous needs within the national park.

Officer Response

Please see Appendix A under Question 3 for a recommendation on the way forward.

The Community Council failed to recognise that seeking a commuted sum of up to £30,000 on a plot will help the delivery of affordable homes. Most felt that the landowner is unlikely to "take the hit" so it will be the developer who has to pay. In short the cost to the possible young couple building their first home will rise by £30,000. Some felt that the levy could well deter developers who would then have no alternative but join the queue for social housing.

This argument apart many members were very concerned that as many villages in Pembrokeshire straddle County and Park boundaries there must surely be a uniform policy between the two Planning Authorities. If this is not the case villagers could find themselves in a situation where there was a £30,000 levy, which the less generous are calling a tax, on one end of the village and a much less significant one at the other end. Or at the height of absurdity, £30k in one area and nothing in the other!

Officer Response

Land prices currently range from £100,000 to £200,000 for single plots and are well beyond the reach of the majority of National Park residents. By requiring financial contributions from these developments it will enable affordable housing to be provided that properly meets the needs of local people. Alternative methods of calculating the sum are however being considered. Please see Appendix A under Question 3 for a discussion on the affordable housing contribution. There is a clear rationale for the differences in approaches inside and outside the National Park. The National Park has because of its national and internationally recognised landscape designation limited capacity for future development. The Council is not so restricted. The National Park Authority therefore has to make significant demands on what little land is capable of development to enable delivery of affordable housing. Using the affordable housing contribution is one such approach.

COMMENT 2

Clause 4.1 (Contd): "On proposals for one home a developer will be required to pay a financial contribution of £30,000 to provide affordable housing, known as a commuted payment. This is the equivalent to the cost of providing a serviced plot of land for affordable housing and will be payable on the date the property is first occupied."

Marloes & St Brides Community Council is totally opposed to this policy, because it will make it even more difficult than it already is for local people to be able to afford to build themselves a house within the National Park, even if they are lucky enough to be gifted a plot of land or to secure a building plot at a reasonable price. If they are trying to buy a new-build house from a third party, they will have to raise an extra £30,000 mortgage against the Affordable Housing commuted payment. This could be the "final nail in the coffin" in an area where the ratio of average house prices to average wages is already punishingly high. In sharp contrast, wealthy people from outside the area who are seeking to purchase a second home would typically accept the £30,000 surcharge as a minor inconvenience.

Further to Comments 1 & 2, in the light of problems encountered by this Community Council and others, when trying to secure provision for extra Affordable Housing for their own community to meet a proven need we propose the following alterations to the document.

COMMENT 3

PCNPA has no moral right to exact an Affordable Housing commuted payment from anyone wishing to develop land within a particular community unless PCNPA can guarantee that any monies thereby raised will be spent on Affordable Housing which will be built within that selfsame community.

COMMENT 5

Marloes & St Brides Community Council is unswervingly opposed to a "flat rate" commuted payment, because it would proportionately impact much more seriously upon the less well off, and it would also encourage builders to develop the largest possible property on any plot. This would add to an already worsening situation where many new-build houses in the National Park are large or very large detached properties which are well beyond the reach of local people – a tendency which is making the housing stock in most villages conspicuously "top heavy", and which perpetuates the second home "feeding frenzy", because these large homes are nevertheless cheaper than their equivalents in say Cornwall or Devon.

Local residents complain to Community Councillors that the PCNPA and County Council should declare themselves as interested parties when they grant permission for large and very large houses – because such properties fall into higher Council Tax bands, and thereby generate more revenue for our local authorities.

COMMENT 6

Definitions. Re Clause 4.1 (Generally): the wording in this clause is far too vague: it should be made clear that commuted payments would only be levied on "net new build" homes: where a new house is proposed to replace an existing property, there is not net addition to the community's housing stock and therefore no commuted payment should be levied. If this point is not clarified, there could be dire consequences for the local building trades, because many local people unable to "fork out" £30,000 could abandon plans to rebuild existing properties – and most of the major building contracts in our area fall into this category.

Officer Response

The proposal is not a surcharge but a cost on the development which will reduce the residual value of the plot. The Local Development Plan asks that affordable housing contributions be safeguarded for the delivery of affordable housing. Please see Appendix A under Question 3 for a discussion on how the monies should be spent. In terms of the likelihood to develop larger properties, the whole premise of the Plan's approach is to 'use' market housing to cross subsidise the delivery of affordable housing. Consequently larger properties can as a rule provide more funding if a more progressive approach to the affordable housing contribution calculation is used. Please see Appendix A under Question 3 for further discussion. Smaller properties on the open market are in any case still unaffordable. The National Park Authority is not in receipt of Council Tax.

Agree to clarifying that this relates, as to the whole supplementary planning guidance, to net additions to the housing stock.

2903 Mr W Hall, Nolton & Roch Community Council

No it will considerably limit building and be a barrier to development. It will be counter productive as the quoted is much too high. The approach is not bad but a big reduction in the sum quoted is needed. Where does the money go? Who is responsible for it?

Officer Response

The affordable housing contribution only applies to permissions for single dwellings which account for a small proportion of planning permissions within the National Park. Alternative methods of calculating the contribution and spending the money have been considered. Please see Appendix A under Q3 for further discussion.

2916 Mr Andrew Davies, Tenby Town Council

Yes members agree that this method should be used but they do not consider it an easy method for calculation

Officer Response

Alternative methods of calculating the affordable housing contribution are being considered. Please see Appendix A under Question 3.

3291 Mr Andrew Vaughan-Harries, Hayston Developments & Planning

It's understood, but the worry is will it stagnate development? Will land-owners sit on land rather than release? Perhaps a phased commuted sum of £10,000, £20,000 plus be considered. It may release a plot of land earlier.
Warn people of rise over 3 years?

Officer Response

Please see Appendix A under Question 3 for a discussion on affordable housing contributions.

3368 Mr & Mrs AR & VS Ash

No. The sum of £30k takes no account of the costs and market value of a single dwelling. £30k represents such a large proportion of a property valued at say £150k as to make its development unviable. Whereas on a property valued at £350k, the £30 contribution is much less significant. The commuted sum should be levied on a sliding scale according to an independent market valuation, eg 0 to 150 = zero, 150 to 250 = 10k, 250 to 350 = 20k, over 350 = 30k. The current figure if implemented will work against the construction of individual small dwellings.

Officer Response

The affordable housing contribution will be a development cost which should be reflected in negotiations when purchasing land. Please see Appendix A under Question 3 for further discussion on affordable housing contributions.

3756 Mr James Dwyer, James Dwyer Associates

No. A universal commuted sum per dwelling, regardless of type, size or location would be inequitable. A developer building a five bedroom house would pay the same as someone providing a one bedroom flat, resulting in disproportionate returns or burden, notwithstanding that a one bedroom flat could very well be near to 'affordable' on the open market. The commuted sum could be determined by the number of bedrooms; however developers may describe rooms as studies or playrooms for obvious reasons. The figure could be determined by the number of habitable rooms but this may lead to a preponderance of open plan layouts which could be subdivided later without the need for planning permission. In my view a more equitable solution would be to require a sum per sq/m of floor area. This approach could be further refined by giving some weighting to location and market value, by using for instance council tax banding.

Officer Response

Noted. See Appendix A under Question 3 for further discussion on this issue.

4123 Mr & Mrs C & H Platel

No, we strongly disagree with the whole concept of penalizing individuals who are trying to improve their standard of living and future through self build projects, using their own funds that have been raised through hard work and have already been taxed.

Officer Response

The affordable housing contribution will be a development cost which should be reflected in negotiations when purchasing land. People wishing to build their own affordable house will not be required to pay the affordable housing contribution providing they sign a legal agreement ensuring that if they sell the property on it should be affordable and for a local person. The policy is consistent with Welsh Assembly Government Guidance that states "In principle all new market housing may contribute to meeting the need for affordable housing" (Planning Policy Wales para 9.2.16) and has been through an examination in public. See Appendix A under Question 3.

4125 Ms Vicky Moller, Cilgwyn Community Group

Good idea to have commuted sum. But suggestions below apply:

Instead of price cap all new homes could be sold to meet community need, plus a small proportion set aside to house those on social needs housing register.

Justification for moratorium on open market for new houses.

Allocations of land for housing is based on assessing housing need. In the past housing need and the open market coincided, not any longer. Therefore placing new homes on the open market is not supported by the land allocation rationale.

Officer Response

The National Park Authority tried, unsuccessfully, to adopt a local needs only policy under the Joint Unitary Development Plan for Pembrokeshire and could not pursue this policy in the Local Development Plan. Given the extent of housing need in the National Park and the diminishing government grant support for affordable housing, the market is increasingly required to deliver affordable housing through cross subsidy and negotiating lower land prices. Market housing is therefore necessary to deliver affordable housing. No change necessary.

4126 Mr T Marmara, T M Design (Carne) Ltd

10.4 Commuted charge is not aimed at developers but the private individual and as such is too high.

10.5 This needs careful consideration as developer will need to re-coup early infrastructure costs.

10.6 Does developer incur fee charges for PCNP legal fees.

Officer Response

The affordable housing contribution will be a development cost which should be reflected in negotiations when purchasing land. Please see Appendix A under Question 3 for a discussion on the affordable housing contribution.

Noted.

The affordable housing contribution can be required by imposing a planning condition on the property.

4128 Mr S Thomas, Ashwood Homes Property Development

Having read the above document we would like to voice some concerns.

In particular on page 15 where it states" A Commuted Payment of £30,000 towards affordable housing will be required on single market dwellings".

As we understand it, if this was to be implemented then we would not be in a position to make such a payment and therefore would be unable to purchase building plots within the National Park. There would be absolutely no point in us buying a building plot, constructing a property to sell and then handing over £30,000 for the benefit of others, with no profit for the business, or possibly making a loss by having to pay this amount over.

This would have a detrimental effect on our business and in our view it would ultimately cause loss of jobs in the construction industry in these difficult times.

We feel the notion that land owners will simply reduce the value of their plots by £30,000 overnight is misguided — Developers would close down in the interim.

Officer Response

The affordable housing contribution will be a development cost which should be reflected in negotiations when purchasing land. It is agreed that new initiatives do take time to become embedded. This is inevitable with all new policy proposals. It is not a reason for not progressing with the proposal where it justified in terms of helping to meet affordable housing need and it is a viable proposition. In the interim there is also of course the opportunity to avail of the current land supply with planning permission which is not fettered in this way. The contribution is likely to affect a small number of proposals. Please also see Appendix A under Question 3 for more discussion on the affordable housing contribution.

4129 Mr Andrew Davies-Wrigley, Pembrokeshire County Council

It seems a reasonable approach.

Officer Response

Noted.

4130 Mr Adrian Lort-Phillips, Lawrenny Enterprises Ltd

This proposal is unacceptable in the form offered since it gives no explanation as to how moneys collected in this way will be routed to the actual provision of affordable housing. Who will handle this money and how will it be applied? The assumption in the SPG that the £30,000 will be used to purchase serviced plots within the NPA is clearly unrealistic. In the absence of purchase opportunities funds will simply lie around in a PCC deposit account or worse still be used for unintended purposes. Moreover, this is so far removed from the PCNPA's statutory purposes it should not be attempted.

Officer Response

Please see Appendix A under Question 3 for a discussion on issues regarding the affordable housing contribution. Paragraph 9.2.16 of Planning Policy Wales advises that commuted sums may be used to meet affordable housing need. It further advises that, in principle, all new market housing may contribute to meeting the need for affordable housing. The principle of imposing an affordable housing contribution was also established in the Local Development Plan which is now adopted.

There seems a lack of flexibility to take into account value of the plot which it is proposed to develop and the cost of developing that plot. Someone wanting to develop a small awkward site with a modest dwelling in a maybe not so attractive area will pay the same someone building a large house with sea views on a ½ acre plot?. Seems a little unfair and could prevent the development. Note there is no viability test on single plot. Would not a sliding scale based on curtilage area for example be fairer? Is there a condition it should be spent in the same locality? Should there not be?

Officer Response

Please see Appendix A, under Question 3 for a discussion on setting the amount that should be contributed and what it should be spent on.

Question 4: Do you agree with the Authority's approach to calculating a price for low cost homes? If you do not agree with this approach please suggest an alternative.

2025 Mr Richard Price, Home Builders Federation

3.2 Paragraph 5.2 - Low Cost Homes

This paragraph states that Low cost homes will be sold at 70% of the Acceptable Cost Guidance (ACG) for the property size and location. In this respect our reading of this requirement is that properties should be sold at 70% of ACG, which implies a 30% discount and not discounted by 70% of ACG.

In the event that the requirement does imply a discounted by 70% of ACG we would make the following comments. We have significant concerns over the impact this requirement would have on development viability. Again, as with the commuted sum requirement discussed above, this particular requirement was not considered within of the affordable housing viability assessment and therefore its inclusion within the SPG is unjustified and inappropriate. The effect of this requirement must be subject to viability testing to ensure it does not have a detrimental impact on the delivery of housing and therefore, until this has been undertaken, this requirement must be removed. This particular exercise could be done when the affordable housing viability assessment is revised, which we state is necessary within our comments above.

3.1 Suggested Change

See above.

Officer Response

This figure was factored into the viability testing done for the Examination. To be clear it is discounted by 30% of the Acceptable Cost Guidance. No change is proposed.

2903 Mr W Hall, Nolton & Roch Community Council

Yes

Officer Response

Noted.

2916 Mr Andrew Davies, Tenby Town Council

Yes members agree that this method should be used but they do not consider it an easy method for calculation.

Officer Response

Noted.

3291 Mr Andrew Vaughan-Harries, Hayston Developments & Planning

The method is well tested.

Officer Response

3368 Mr & Mrs AR & VS Ash

Acceptable.

Officer Response

Noted.

3756 Mr James Dwyer, James Dwyer Associates

Don't know

Officer Response

Noted.

4123 Mr & Mrs C & H Platel

I am confident that the authority is calculating the requirements and costs accurately, it is purely their method of collecting the funds that I disagree with, this can only be seen as applying another tax, specific to a tiny minority, why should it be this minority that pay?

Officer Response

All other developments of 2 or more homes have to contribute to affordable housing by building homes. Requiring an affordable housing contribution on single dwellings means that all new housing contributes to affordable housing, consistent with government policy, rather than allowing a small minority to avoid any contribution. No change necessary.

4125 Ms Vicky Moller, Cilgwyn Community Group

No. There is no need to set such a low ceiling, some homes which are fully renewably powered and built to passivhaus standards using local natural materials could be dearer to buy and cheaper to run, and foster health and well being, creating long-term economies. Such as low ceiling forces lower capital investment, a false economy. All that is needed is a secondary market with restrictions on who can buy. Your definitions of local seems fine as restrictions, except it should include 2 other criteria. See below. Why set a price when all you need to do is restrict occupancy. The market will sort out the rest.

Social housing for those with need is a wholly different category and needs addressing differently. The council gives the highest points to those most in need who are often the weakest, eg single parents or those with physical, mental, behavioural or addiction problems. If you restrict availability to these categories by mixing up social need and the need for homes for communities, you simply reward those with problems and penalize those without who just cannot compete on the open market because it is a distorted monopoly market. (Land being a limited commodity, monopoly forces and investment speculation apply).

Officer Response

See previous response on not being able to apply a locals only policy. The Housing Authority are under a legal obligation to house those most in housing need. The guidance also sets out where occupancy controls can be used in conjunction with planning permissions granted. The Authority cannot impose controls on Registered Social Landlord developments (the Council is not constructing affordable housing at present) but Registered Social Landlords can enter into voluntary lettings agreements.

4126 Mr T Marmara, T M Design (Carne) Ltd

PCNP should run advisory seminars for professionals and developers to initially comprehend the processes and discuss and question. Drop-in afternoons are not sufficient. The proposed processes are inevitably going to extend the planning application. How quickly can other partners ie Housing Associations, respond to proposals.

Officer Response

Noted.

Developers should engage with registered social landlords before submitting a planning application and have agreed transfer arrangements and signed section 106 legal agreements to be submitted with the planning application thus reducing any potential delay in determining planning applications. Seminars may assist subject too the resources being available to support running them. Organising seminars is worth considering but this is dependant on the resources available. No change necessary.

4127 Mr Guy Thomas, Guy Thomas & Co

3. Review the market price caps and produce a new document for consultation that strikes a workable balance between cost and affordability e.g. it is reasonable to expect a local couple to have saved a deposit.

Officer Response

The approach set out aims to target those in need of affordable housing unable to find housing on the open market. The pricing reflects the gap between local wages and the price of housing at the lower end of the open market but liveable. It cannot be expected/required that a couple will have a deposit.

4129 Mr Andrew Davies-Wrigley, Pembrokeshire County Council

Yes

Officer Response

Noted.

4130 Mr Adrian Lort-Phillips, Lawrenny Enterprises Ltd

Calculating values of land or housing of any kind is not an appropriate task for a National Park Authority. Its housing responsibilities should lie in ensuring the best possible design in the most suitable location thus fulfilling the key statutory purposes of the National Park. It is for a Housing Authority to work out valuation procedures with recognized partners, leaving the NPA to concentrate on its proper functions. It is administratively incapable of handling these issues, and has neither the skills nor the resources to achieve them.

Evidence for this statement is that in at least one known recent successfully appealed planning application involving affordability, officers clearly gave misleading evidence to members on viability issues. The 18 month delay thus caused while the appeal was run frustrated the building and occupation of housing by local people in genuine need and able to afford the asking price.

The SPG seeks to confer powers on officers which they have shown themselves by such examples unable to handle impartially and constructively. Any valuation procedure lacking independent viability assessment or input from professionals involved in designing, building, marketing or providing mortgage finance for housing is bound to fail and will frustrate what should be the key objective, the provision of affordable housing to local people. It leads the public to question whether the PCNPA actually regards this as a desirable and achievable objective.

Officer Response

The Authority as planning authority is obliged to undertake these duties. The proposal referred to, if it is the development at Home Farm approved on appeal on the 29/06/10, was approved only on the basis of information supplied by the applicant during the course of the appeal. Planning application Reference NP/09/245.

4131 Ms Linda Jones, Acanthus Holden

ACG is a recognized formula

Officer Response

Noted.

Question 5: Do you agree with the cascade approach to ensuring that affordable housing does not remain vacant for long periods, set out in page 13? If not, please suggest how you think it should be changed.

2873 Mrs Shirley Goldsworthy, Angle Community Council

Ours is a small, sensitive conservation area with very little opportunity for any development other than single dwellings or exception sites. A recent housing survey has identified a need for additional affordable housing for members of the community and we are actively pursuing possible ways of developing a scheme.

In doing so it has become apparent that the ability of a scheme to satisfy local demand into the future will be required to obtain the support of vital stakeholders. It has also become apparent that the current terms of provision of SHG are not complimentary to this aim. Specific mention is made within the document of the need for affordability in perpetuity but less emphasis is placed on the need to satisfy local demand beyond first occupancy. We do not consider it appropriate for a small community such as ours to be expected to support provision of affordable housing other than to satisfy local demand both now and in the future and this document falls short in providing for this requirement.

Officer Response

The Authority cannot control occupancy where a Registered Social Landlord is involved. We sought to challenge this position under the Joint Unitary Development Plan and failed. Registered Social Landlords can however impose voluntary letting agreements. It was understood that Angle Community was pursuing the Community Land Trust option which would allow for occupancy controls to be put in place. However, any occupancy control that is imposed via a S106 agreement has to have a cascade included should there be no local need for a property when it comes to be relet. Paragraph 12.7 Technical Advice Note 2: Planning and Affordable Housing.

2903 Mr W Hall, Nolton & Roch Community Council

Yes

Officer Response

Noted.

2916 Mr Andrew Davies, Tenby Town Council

Members feel that the cascade approach should be used if consideration is given to local people in the first instance. The definition of 'local' needs consideration as it could apply to anyone living within the area for 12 months and it could be easy to circumvent. Members feel that if affordable housing has to be cascaded, then by definition it cannot be affordable to the local population.

Officer Response

Consideration will be given to local people first. The definition of local is taken from the housing Authority. Please see Appendix A under Question 5 & 6 for further discussion. A cascade mechanism is required by national guidance (Technical Advice Note 2 Affordable Housing para 12.7) and necessary to ensure that properties do not remain vacant leading to lost rent or difficulty selling a property. No change necessary.

3291 Mr Andrew Vaughan-Harries, Hayston Developments & Planning

Yes, but why not add another tier of TAN6 - Rural enterprise worker or forestry/farm worker as it used to be.

Officer Response

Such a worker could qualify in the first instance and through the cascade if in affordable housing need - see section 16 definition of a local person. No change is necessary.

3368 Mr & Mrs AR & VS Ash

8.5 "purchase". A further clause should be added. "If after a year of marketing the property has still not been sold, the owner should be allowed to sell on the open market at market value."

Officer Response

National guidance requires affordable housing to be affordable "both on first occupation and for subsequent occupiers."(paragraph 5.1 of Technical Advice Note 2) No change necessary.

3756 Mr James Dwyer, James Dwyer Associates

Yes

Officer Response

Noted.

4123 Mr & Mrs C & H Platel

Of course, taxing people to build these houses then leaving them empty is just adding insult to injury.

Officer Response

Noted.

4125 Ms Vicky Moller, Cilgwyn Community Group

Good approach, but be willing to adapt if it fails in practice to deliver.

Officer Response

Agree.

4126 Mr T Marmara, T M Design (Carne) Ltd

No All affordable units should be allotted at commencement on construction or revert to developer.

Officer Response

Affordable housing need is immediate and allotting units to someone to await occupancy on completion, which in some cases takes years rather than months, is impractical. Affordable housing has to be affordable in perpetuity and it is doubtful that developers would want to be saddled with finding occupants in housing need and reselling the unit at an affordable rate each time one became vacant. No change necessary.

4129 Mr Andrew Davies-Wrigley, Pembrokeshire County Council

Yes

Officer Response

Noted.

4130 Mr Adrian Lort-Phillips, Lawrenny Enterprises Ltd

This should be a Housing Authority not a National Park responsibility, one the HA should undertake in consultation with the community affected together with RSL's, landlords and the rural housing enabler . Suggestion at 8.4 of the SPG (that the NPA handles a local cascade process) should not be attempted. Given the demand for rented accommodation everywhere long term vacancies are extremely unlikely to occur. If they do, private landlords and RSL's should consult the Housing Authority to identify the best local solution.

Officer Response

The need for planning authorities to use cascades is set out in Technical Advice Note 2 on Affordable Housing paragraph 12.7. They have been drafted in consultation with the Housing Authority and Registered Social Landlords. Cascade provisions are already in operation in Section 106 agreements. In practice this Authority relies on the Housing Authority's advice and support as to whether the cascade provisions have been complied with. The cascade provisions have been written to ensure that long term vacancies will not occur. Please also see Appendix A under Question 5.

4131 Ms Linda Jones, Acanthus Holden

Yes.

Officer Response

Noted.

Question 6: Do you agree that we should use the same definition for local and housing need as the housing authority (Pembrokeshire County Council)? If not how else would you define local and housing need?

2903 Mr W Hall, Nolton & Roch Community Council

yes

Officer Response

Noted. Please see Appendix A under Question 6 for a discussion on local occupancy criteria.

2916 Mr Andrew Davies, Tenby Town Council

Members agree that the same definitions should be used but feel that local should pertain to a particular locale rather than the whole county, eg postal or electoral boundaries.

Officer Response

Agreed need to define what is meant by local area. Please see Appendix A under Question 6 for a discussion on local occupancy criteria.

3291 Mr Andrew Vaughan-Harries, Hayston Developments & Planning

Yes.

Officer Response

Noted.

3368 Mr & Mrs AR & VS Ash

Yes

Officer Response

Noted. Please see Appendix A under Question 6 for a discussion on local occupancy criteria.

3756 Mr James Dwyer, James Dwyer Associates

Yes

Officer Response

Noted. Please see Appendix A under Question 6 for a discussion on local occupancy criteria.

4123 Mr & Mrs C & H Platel

It would make sense to not overcomplicate things.

Officer Response

Noted. Please see Appendix A under Question 6 for a discussion on local occupancy criteria.

4125 Ms Vicky Moller, Cilgwyn Community Group

No, yes to most of the local definition, no to the need definition.

Local - Living, family or work connection is fine. Locally brought up and schooled should be added. Some people go away as young adults to get professional experience, but want to return with their expertise and to bring up their children. Welsh language could be added as a factor in a scoring system, not to make it a dominant requirement, but to add score.

As stated above don't confuse need as in social need and the need which affordable housing policy is designed to meet which is the need of the community to survive and thrive through continuity and having people who can contribute economically.

I question therefore the requirement for a contract. Some jobs are not by their nature suitable for contracts, eg, the self employed. But if not contract then some other method to prove a real need for the work in that community.

In the previous SPG you used the term "the sustainable community", which is odd and rather meaningless. The immediate community would be less pretentious.

Officer Response

Adding Welsh language as a score would not be appropriate given the differences in proportion that speak Welsh across the County. No change necessary.

Regarding returnees the person may qualify under the employment category or those who have recently returned but have lived there previously category. Please see Appendix A under Question 6 for a discussion on the use of occupancy controls.

With regard to people living locally but not on full time contracts they may still be eligible for affordable housing being local if they have lived in the area for the past 12 months and in need, for example if they are in rented accommodation. No change necessary.

4126 Mr T Marmara, T M Design (Carne) Ltd

Providing houses for local people.

Officer Response

Noted. Please see Appendix A under Question 6 for a discussion on local occupancy criteria.

4127 Mr Guy Thomas, Guy Thomas & Co

Your consultation draft supplementary planning guidance on Affordable Housing has been issued. This effectively removes any priority for the indigenous people of Pembrokeshire. Local now being merely any parent of a child in school or a "52 week" resident. Even Anglesey has a 15 year residency rule.

Such homes that may become available will be let on a welfare need priority not apportioned proportionately to the needs of the whole community.

1. A 15 year residency 'local' requirement.

5. Introduce a mechanism for additional scrutiny of "local" qualification, possibly involving the PCC local member and/or Community Council.

Officer Response

See Appendix A under Question 6 for a further discussion on setting occupancy controls. The Authority also has to guard against issues of discrimination.

4129 Mr Andrew Davies-Wrigley, Pembrokeshire County Council

I do agree as it avoids confusion.

Officer Response

Noted. Please see Appendix A under Question 6 for a discussion on local occupancy criteria.

4130 Mr Adrian Lort-Phillips, Lawrenny Enterprises Ltd

Yes, if you are referring to the provisions of the draft PCC SPG on affordable housing out for consultation. See appendix to comment section for detailed policy extract. Private landlords and RSL's should consult rural housing enablers and affected communities and make recommendations to the Housing Authority based on the criteria outlined under this policy.

APPENDIX

Extract from PCC description of a local person [Draft PCC SPG on Affordable Housing]

Section 15.6

A local person is any applicant who meets at least one of the following:

- Has lived within the area, on a permanent basis, for the past 12 months;
- 24
- Has a close family member (parent, child or sibling) living in the area, for whom they would provide support and whose quality of life would be dramatically improved if that person moved closer to them;
- Has a close family member (parent, child or sibling) living in the area, from whom they would receive support and thereby experience a dramatically improved quality of life;
- Currently lives on a permanent basis within that area and has lived in that area for at least 5 years out of the past 10 years;
- Has permanent full time employment within the area or has an offer of employment on a permanent contract in the area;
- Has a child or children at the local school.

15.7 The "local" requirement is not made of RSL managed properties because they, and the Local Housing Authority, have a legal duty to house those most in need, in affordable rented accommodation, irrespective of whether they are local. Their ability to house those in most need should not be restricted by planning agreements or conditions. However local letting policies have been used to try and attract local people to bid for affordable rented accommodation when it is first made available.

Officer Response

Please see Appendix A under Question 6 for more discussion on occupancy controls.

4131 Ms Linda Jones, Acanthus Holden

Local is the key to provision in the National Park.

Officer Response

Noted. Please see Appendix A under Question 6 for a discussion on local occupancy criteria.

Question 7: Are there any other methods of delivering affordable housing that you think should be highlighted in the guidance?

2416 Mr Graham Warrilow

Yes, the 2 local Authorities, ie PCC and PCNPA should allocate any land/buildings that are surplus to requirement for affordable housing. I note that PCC ????. Sold off school sites, houses, shops etc on the open market.

Officer Response

This Authority has extremely limited opportunities for delivering affordable housing on sites surplus for requirements but would seek to deliver affordable housing where this is considered appropriate to those sites.

2903 Mr W Hall, Nolton & Roch Community Council

Not qualified to answer.

Officer Response

Noted.

2916 Mr Andrew Davies, Tenby Town Council

No, although members support the idea of community development trusts.

Officer Response

Noted. Please see paragraphs 7.2 and 7.3 of the guidance.

3291 Mr Andrew Vaughan-Harries, Hayston Developments & Planning

The Housing Association or LPA/NPA should build more themselves or release land they have on their books. Should be joint public/private way forward.

Officer Response

The guidance reflects the current position regarding public funding of affordable housing. Pembrokeshire Housing also advise not to rely on Social Housing Grant in the future.

3368 Mr & Mrs AR & VS Ash

No.

Officer Response

Noted.

3756 Mr James Dwyer, James Dwyer Associates

Yes. Encourage landlords with older empty properties to upgrade or convert their buildings for affordable housing by zero rating VAT on the building work, which currently is payable on work to existing buildings but not on new dwellings. Probably something for a national policy?

Officer Response

Re-using empty properties is something that the housing authority will be looking in to. No change necessary.

4123 Mr & Mrs C & H Platel

We understand totally that there is less opportunity for people to improve their standard of living and we also accept that outside influences dictate the increase in property costs therefore making them unaffordable, this can be directly attributed tourism, lots of people want to live there, prices go up, locals can't afford them. Surely the most logical thing is not to tax indiscriminately a tiny minority of individuals who wish to do exactly what you are trying to do which is build themselves an affordable home, surely why not tax the cause. Eg, A levy on all tourist reliant businesses and corporations who significantly profit from the tourist income. There is a far, far greater number of people in this position and rather than the ludicrous £30k figure that is being levied on a few, a more palatable and acceptable figure of less than £500 on many would achieve the same. This is simply a case of what is right and proper, whom ever came up with this proposed tax surely does not understand the long term implications and the blatant unfair method of taxation that this represents.

Officer Response

Affordable housing contributions relating to new development can only be charged by the Authority in relation to planning applications. The Authority has no general taxation powers, nor can it control who buys market housing whether for their own use as a home, second home or holiday let. The Authority can however seek a contribution from new market housing towards affordable housing to be built and provided for local people who cannot afford to build or buy their own home and are currently in housing need. People wishing to build their own affordable house will not be required to pay the affordable housing contribution providing they sign a legal agreement ensuring that if they sell the property on it should be affordable and for a local person. No change necessary.

4125 Ms Vicky Moller, Cilgwyn Community Group

Yes, Research development of the TAN6 revisions to allow more existing rural buildings to become work live complexes. This could be framed as a combination of the two new open countryside dwelling categories: living with a rural business and one planet development. If several homes were allowed to be developed on farmsteads, with requirements to contribute to the local economy and with reduced car use, reduced or no service dependence, reduced or no carbon impact contributing to wildlife habitat. This would create 'sustainable communities' and meet local housing need while allowing existing settlements to retain their green areas for meeting their needs for services and resources.

Officer Response

Low Impact Policy making a positive contribution - policy 47 - allows for such development. No change necessary.

Exception sites should be easily available subject to agreement of number and housing needs.

Officer Response

Exception sites can make a contribution where there are no allocated sites for affordable housing. However in practice there have been constraints- often landowner expectation of price - that have meant these sites have not been viable. Nevertheless the Authority is keen to work with the rural housing enabler to identify opportunities for exception sites. No change necessary.

Yes all the methods highlighted in TAN 2 and TAN 6 for example; See quotes; “Tan 6 4.2.3 In smaller settlements and clusters, planning authorities should proactively engage with the local community and rural housing enablers to bring forward sites for affordable homes to meet local needs. The objective should be to develop a clear vision of how the local need for affordable housing can be met and the sustainability of the community as a whole enhanced. Planning authorities should ensure that the affordable housing provides for genuine local needs, is affordable in perpetuity, well designed and of the right scale. Sites for affordable housing should either be selected as part of the development plan process or be brought forward as affordable”.

Tan 6 4.2.4 “Possible methods of delivery include community land trusts, private landlords and unsubsidised affordable housing”.

One major stumbling block to be removed from the text is the suggestion that if agreement cannot be reached with a developer on viability grounds then a planning application can be refused. An applicant needing housing and fully qualifying under local needs criteria may thus be frustrated by a planning authority refusing planning permission, even though both developer and applicant may have between them agreed a price which the former finds viable and the latter finds affordable. This is giving officers power to super veto any application, and is extremely dangerous in the light of at least one past case of an officer providing misleading evidence in a viability dispute.

Officer Response

Viability is an issue which the Authority has to have regard to. To remove it from guidance would be contrary to national policy. There also has to be requirements set out as to what is considered to be affordable as the units will be a community asset available to those not able to afford on the open market. The commentator appears to be describing a local needs policy which alone without affordability controls is contrary to national planning policy.

Question 8: Have you any suggestions or comments that you would like to add to your response?

1307 Mr SA Taylor, Martletwy Community Council

Fundamentally, the Council feels that the Guidance - if adopted in its draft form - carries with it a significant risk of curtailing residential development in the National Park area altogether, particularly in the current climate of escalating commercial pressures. They are concerned that such a heavy-handed approach could undermine the achievement of the good intentions behind it: the law of unintended consequences in action!

Officer Response

The Authority has a clear commitment to review the affordable housing policy within 4 years of adoption as recommended by the Planning Inspector in his report on the examination in public into the Local Development Plan. If the policy is not delivering it can be changed at that time. No change necessary.

The comments that follow are my personal view of the Pembrokeshire Coast National Park Authority's strategy on Affordable Housing Planning. I should add that coming from the East End of London, I have witnessed the social change engendered by the gentrification of the housing stock. In Tredegar Square where the houses built for the Captains of the East India Company degenerated to house four or five families per house, with cookers and sinks on each landing. Then, with the resurgence of power and wealth in the City, revert to single family occupancy with a multi million pound price tag. Mews stables which housed costermongers ponies have been converted to apartments worth £500,000 and more. So I can not but ask myself how this experiment in social engineering by manipulation of the housing stock, will pan out for population of the National Park. My priority in the following comments is to protect as far as possible the owner, builder and occupier and the small local builder from this social experiment.

2.3 a) The term "seek to negotiate" is too vague. It infers that with the right approach, whatever that may mean, the developer would not have to provide the 50% affordable housing criteria. Where there are 2 units on a site, the requirement to build one low cost unit next to a necessarily high cost unit may have the following effect. Depress the saleability and price of the higher value unit. Secondly allow entirely different and mismatched style of construction and design between the 2 units, to the detriment of the area.

2.3 b) This is the clause in which "conversion" of property is mentioned. If the site of the conversion is not large enough for another dwelling to be built, does this mean that land elsewhere can be released to build a low cost unit?

2.3c Does this mean that a commuted sum will be levied on a conversion? Given the special conditions imposed on an individual seeking to build a single unit for his own occupation that it "Has to have high standard, and traditional design in keeping with the area. Together with provision of sewage disposal". Is it fair to add the commuted sum tax. A wealthy individual could purchase a large plot, build his own house and could provide a low rent accommodation over the detached multi-car garage or stable for a handyman/housekeeper. Thus avoid the commuted charge. Even if he couldn't avoid paying the charge, it would be insignificant against the total cost.

4.1 Which sites should affordable housing be provided - see comments in section 2 above.

8.5 & 6 No one eligible for affordable housing.

Marketing should be more tightly specified as it is liable for manipulation.

9.5 Affordable housing making proposal unviable.

Does compulsory purchase powers exist or be appropriate in these circumstances?

10.2 Other factors

This may be preferred, but it will depress the price of the "non affordable" property and thus reduce the viability of the scheme.

10.4 This clause discriminates against a person desiring to return to his native county.

10.7 Has the appearance of a get out clause.

11.1 Requirements on a developer when submitting planning application.

Again this section does not cater for the small builder.

Officer Response

The Authority cannot control who buys market housing whether for their own use as a home, second home or holiday let. Luxury flats and existing homes sold on the open market are way beyond the reach of most residents in the National Park. The National Park Authority's only recourse in trying to address this imbalance of house prices and housing need is to try and secure as much affordable housing as possible by requiring developers of market housing to deliver affordable housing too. No change necessary.

2.3 a and b) It is necessary to build in flexibility in to the policy. There will be extraordinary costs of developing some sites such as, for example, decontamination and unforeseen infrastructure costs that may affect the viability of a scheme and mean that our requirements need to be adjusted. We will require affordable units to be indistinguishable in terms of external design from market units and there is currently no evidence to suggest that affordable housing depresses the value of market housing on mixed sites. With regard to conversions if a building is only suitable for one unit we will ask for an affordable housing contribution. No change necessary.

2.3 c) Affordable housing contribution are payable on single new dwellings and conversions. Where it is not viable to provide housing in a conversion there are other uses that can be considered such as employment, farm diversifications etc. No change necessary.

4.1 - see Officer Response re issues raised for Section 2 above.

8.5 & 6 The Authority will expect evidence of marketing to be provided and the housing authority will vet applications to ensure that people meet the requirements.

9.5 The Authority has compulsory purchase powers and will consider using them, as a last resort, where an owner of an allocated housing site refuses to develop or sell the land for development.

10.2 There is currently no evidence that mixing affordable and market housing depresses market housing value. If a developer can demonstrate that a scheme may not be viable the Authority can negotiate to reduce other financial contributions and/or lower the affordable housing requirement. No change necessary.

10.4 If that person is housing need they will be eligible for social rented housing even if they have not lived in the area for some years. No change necessary.

10.7 Allowing for negotiation on financial contributions will enable the Authority to prioritise affordable housing. No change necessary.

11.1 The Supplementary Planning Guidance is intended to provide guidance to all developers - small and large. The step by step guide is relevant to most developments, although it is accepted that it would not be relevant to single dwelling applications where an affordable housing contribution would be payable rather than providing affordable housing on site. No change necessary.

1308 Mrs C Southwick, Manorbier Community Council

In response to the issue of Affordable Housing raised at the meeting on 6 December, 2010 of Manorbier Community Council. Comments were that the sum of £30,000 is not agreeable by this council and that controls are needed on both types of development on each site. We are open to any comments or suggestions from yourselves. Please keep us informed of any future developments.

Officer Response

Please see Appendix A under Q3 for a discussion on affordable housing contributions.

1670 Ms Louise Edwards, Environment Agency Wales

We have no comment to make on the above draft SPG.

Officer Response

Noted.

2025 Mr Richard Price, Home Builders Federation

1. Initial Comments

We object to the affordable housing percentage targets set out within this SPG, as we believe they will have a severe detrimental impact on development viability. We also believe their impact on development viability was not properly considered at the LDP Examination and therefore the policy is contrary to National Guidance on the appropriate creation of affordable housing policies.

Throughout the LDP process, and particularly at the recent LDP Examination session regarding the affordable housing policy, we commented consistently that we do not believe the affordable housing policy is sound. We believe the evidence base does not support the policy requirements, and we also believe the methodology used to assess the viability of the policy is unsound.

1.1 Suggested Change

In light of the comments above and the potential damage this policy could have on the provision of homes within the NPA, particularly in the current climate, we believe the policy should be abandoned until a proper assessment of its impact on development viability is undertaken. In the meantime, we also believe it is imperative that the NPA takes a flexible approach to implementing the policy. We understand that the Inspector's decision is final, however we would hope the NPA recognises the difficulties that both business and public sectors are facing at present and we also hope they recognise the need to prioritise the delivery of homes in general, in order to ensure we provide sufficient homes of the right type for the people and families of Pembrokeshire Coast National Park.

Officer Response

This is an objection in principle to the affordable housing policies of the adopted Plan. The objection was addressed through the Local Development Plan Examination. No change.

4.2 Paragraph 9.4 – Short Term Planning Permissions and Claw Backs

This paragraph states that if the Authority is minded to approve a proposal with lower percentages of affordable housing than set in policy 45, because of poor market conditions or extra costs affecting viability, a short-term permission may be granted or a claw back clause required in a section 106 planning agreement.

We object to this proposal as we believe it is extremely restrictive, unjustified and inappropriate. Considering our comments on the viability of the affordable housing policy and the lack of viability testing with respect to the commuted sum requirements, it is highly likely that all potential developments will require renegotiation on the level of planning obligations required. Therefore, given that the level of planning obligations assumed to be viable within the LDP at present is unjustified and unrealistic, they should not be used as a benchmark to assume the level of planning obligations that would currently be viable on development sites.

We agree that a flexible approach should be taken to negotiating planning obligations on a site by site basis, however, the NPA should also ensure its LDP policies are sound and robust in relation to the market conditions that are prevalent at the time they are implemented. In this context, we believe that if market conditions change, the LDP should be monitored properly and its policies should be changed as necessary as a result of the LDP review process, rather than the NPA employing unjust short term measures such as this, in order to attempt to claw back money that was not actually available in the first instance.

In addition to this, such short term planning permission will cause unnecessary and costly delays within the process, if developers are expected to continually submit planning permissions to allow developments to go ahead. Therefore, we do not believe this would be an appropriate course of action to take, particularly in light of our comments above.

4.1 Suggested Change

Paragraph 9.4 should be removed.

Thank you for taking the time to consult the HBF at this stage of the consultation and I look forward to working with you in the future.

Officer Response

The text of the supplementary planning guidance is consistent with the guidance contained in the Welsh Assembly Government's Delivering affordable housing using section 106 agreements: A Guidance Update, September 2009. A cross reference to the guidance may however be more helpful than attempting to summarise the Welsh Assembly Government Guidance. No further change is proposed.

2416 Mr Graham Warrilow

This whole approach will severely restrict housing provision in the NP area. No landowner/developer will release land on the basis set out and therefore the local plan provision will not be met. This approach is a move backwards to 1947/50. This is the most negative approach to planning/housing provision and will result in pressure to build more outside the Park. Perhaps this is the main intent. The percentages should be greatly reduced to no more than 25% on any site.

Officer Response

The overall aim of housing provision in the Plan is to provide affordable housing as projection figures provided for Plan preparation would suggest there would be no other need. The provisions have been made based on viability assessments using the Three Dragons Toolkit with private development providing the finance to cross subsidise affordable housing development. There are also purely affordable housing sites being proposed. The monitoring and review process will be used to consider how the policy has been implemented. The consultation on the supplementary planning guidance does not provide an opportunity to revisit the policies of the Local Development Plan.

2873 Mrs Shirley Goldsworthy, Angle Community Council

Our members have had opportunity to review the draft SPG and have asked me to write to you as follows. Our interests lie solely with our own community and it is not our intention to comment on any issue which is unlikely to directly affect us or where we have no concerns.

Officer Response

Noted. See response to issues raised under Q3 and Q5.

2897 Mrs YC Evans, Marloes & St Brides Community Council

COMMENT 1

Clause 4.1: "Affordable housing must be provided on any proposal for two or more homes." Marloes & St Brides Community Council is in agreement with this policy, because it effectively requires commercial property developers to contribute to a community's affordable housing stock pro rata with their development of freehold housing which they will sell on the open market.

Officer Response

Support for this policy in the adopted plan is noted.

COMMENT 8

Clause 7.3: It is not reasonable for PCNPA to expect small community councils such as ours to set up and operate Community Land Trusts. So, as there is a definite demand for CLT leasehold plots for self-build in every small community within the Park that we are aware of, PCNPA, perhaps in conjunction with Pembrokeshire County Council, must support the establishment of an overarching not-for profit Pembrokeshire Community Land Trust which would own, operate, and administer all CLT self-build sites within Park / County small communities, along Housing Association lines. Clause 7.3 must be re-worded to explicitly allow such an arrangement.

Officer Response

The Authority is not 'expecting' Marloes to set up a Community Land Trust. It is an option available to local communities and the Rural Housing Enabler is on hand to assist as much as possible. The whole idea of Community Land Trusts is that they are local community led and to have a County wide one undermines the ethos of such approaches. Alternative methods also exist namely through the Rural Housing Enabler working with communities and local authorities and housing associations. No change is proposed.

COMMENT 4

Further to Comment 3, the SPG must affirm that where a formal Housing Needs Survey has established the need for Affordable Housing within a particular community, the PCNPA will commit itself to enabling such housing to be provided within that selfsame community. There is ample evidence that provision of housing even in the neighbouring community is not an acceptable alternative.

Officer Response

Given the National Park's landscape quality sometimes it is not possible to deliver affordable housing within an individual local community. The Authority will however make every effort to deliver locally.

2897 Mrs YC Evans, Marloes & St Brides Community Council

COMMENT 7

Clause 7.2: It is not fair to impose a Clause 106 legal agreement controlling terms of resale in perpetuity on an individual who builds an affordable housing unit for themselves. Such a restriction – especially the insistence that the purchaser must be “in housing need” – could leave the vendor in limbo, if they should need to sell up and discover that nobody who wishes to buy the property meets the legal requirements. In any case, such a restriction would surely make it impossible for the would-be self builder to raise the mortgage necessary to build the property in the first place, because the house could have zero resale value.

In the longer term, PCNPA has to accept that change of use / ownership will occur – as they have done in the past. For example, the development at North Hall, St Ishmaels, housed HM Coastguard staff then working at St Ann's Head; but PCNPA did not insist on these houses being bulldozed when the St Ann's Head watch was closed and the houses were then surplus to HMCG requirements.

Officer Response

To change the guidance as suggested would be contrary to national planning policy which asks that affordable housing remains affordable both on first and subsequent occupancies. Paragraph 5.1 of Technical Advice Note 2: Planning and Affordable Housing.

2903 Mr W Hall, Nolton & Roch Community Council

Please remember that not all Councillors have email or computer experience. What will happen if libraries close? Do you expect part time clerks to down load and distribute 34 page docs??

Officer Response

A paper copy of the document can be supplied free of charge on request. No change necessary.

2916 Mr Andrew Davies, Tenby Town Council

While members broadly welcome the guidance, they still feel that the targets set for the provision of affordable housing within developments are unrealistic, (particularly the 60% target for Tenby) and are unachievable. They welcome the suggestions of the Welsh Assembly Inspector that these levels could be monitored to ascertain the policy's effect on development within the Park.

Officer Response

Noted.

3291 Mr Andrew Vaughan-Harries, Hayston Developments & Planning

The timing of Code III/IV and other developer contribution SPG's is perhaps worrying in a time of recession. If WAG appear focussed on sustainability and affordable housing - perhaps other contributions could be relaxed in the short term.

Officer Response

The approach set out in the Plan and guidance is to seek to prioritise the delivery of affordable housing where meeting all the policy requirements would make it unviable as long as this would not overburden existing community infrastructure. (Policy 45 last paragraph) The authority cannot 'ignore' the other associated community demands made by housing particularly where this would mean that the off site services would effectively have to be borne by other developments or through the public purse (paragraph 3.18 Inspector's Report).

3368 Mr & Mrs AR & VS Ash

No.

Officer Response

Noted.

The Association, as a key local provider of affordable housing, welcomes the opportunity to comment on the Draft SPG.

It is important that the policies set out in the adopted LDP and the accompanying SPG actually do deliver the much needed affordable housing in the PCNPA area.

The LDP identifies the requirement for 517 affordable homes during the plan period.

To date, since adoption of the JUDP in 2006 very little affordable housing has been delivered through the planning process.

It is essential that the delivery of affordable housing through the planning process is not reliant on the availability of SHG as this will be substantially reduced in the next few years.

The affordable housing requirements on allocated sites set out in paragraph 13 of the document clearly recognise this.

It is suggested that the definition of Intermediate Rent Levels clearly states "within the Local Housing Allowance".

With regard to the standards of affordable housing provided it is suggested that all properties should be, as a minimum, to the Welsh Housing Quality Standard (WHQS). This could be included in the Affordable Housing Statement required under paragraph 20.

The Association supports the payment of commuted sums for single plot developments. It is suggested that such sums are transferred to a local RSL to support development of affordable housing on a site agreed with the local housing authority and PCNPA.

With regard to the definition of a local person in paragraph 16 it is suggested that the initial area is defined as the Community Council.

It is suggested that the definition of an RSL is one supported for development in Pembrokeshire within the WAG zoning document.

I trust the above comments are of assistance.

Officer Response

Between 2001 and 2010 64 affordable dwellings have been completed. There are also a number of planning permissions in place where an element of affordable housing has been sought. More needs to be done. The Plan sets the context for delivering even more affordable housing and the monitoring and review process will assess whether this is progressing as planned. The advice regarding Social Housing Grant is noted. Amend the Supplementary Planning Guidance to reflect this fact.

Agree to amending Section 15 as suggested.

Agree to amend paragraph 10.3 and Section 20 to advise that Registered Social Landlords have a duty to ensure that all their properties are fitted to Welsh Housing Quality Standards. All housing built for transfer to Registered Social Landlords should therefore as a minimum meet this standard.

Support for the affordable housing contribution approach is noted. Funds are likely to be used throughout the National Park and therefore the Housing Authority is likely to be the holder of such funds for the Housing Association to access. See Appendix A, under Question 3 for further discussion.

Regarding amending Section 16 please see Appendix A under Question 6.

With regard to the description of a Registered Social Landlord in the Glossary of Terms add ' In practical terms it is those Registered Social Landlords supported for development in Pembrokeshire by the Welsh Assembly Government that will be pursuing the delivery of affordable housing under this guidance.'

3756 Mr James Dwyer, James Dwyer Associates

The Inspector, in his consideration of the LDP seemed, to some degree, sceptical that the affordable housing policy would deliver as hoped, given the substantial demands on developers. The Inspector advised the policy should be reviewed during the plan period if that appeared to be the case. I would contend that a fixed period, of say 18 months, should elapse at which time a review should be carried out regardless and amendments made to the affordable housing policy accordingly. If need be.

Officer Response

The Authority has already incorporated the Inspector's recommendation to review the Plan in 2014/15 if 80% of the proportion of the overall target for the Plan period that should be available by the date has not been built or is not under construction. No change necessary.

4118 Mssrs PJ & FK Booth, Anglodefine Ltd

We write following an article in this week's Western Telegraph regarding Pembrokeshire National Parks proposals to charge £30k for planning permission applications. We wish to object most strongly to this proposal on the grounds that we currently have no major industries in Pembrokeshire to create any employment and whereas building projects were previously a huge part of our workforce, now Plumbers, Carpenters, Electricians etc. are finding work most difficult to obtain, with the majority having to look for work outside the County. If PCNP were to action their proposals, it will only result in further unemployment, something which desperately needs to be avoided.

Officer Response

The affordable housing contribution only applies to permissions for single dwellings which account for a small proportion of planning permissions within the National Park. See Appendix A under Question 3 for further discussion on the issue of affordable housing contributions. No change necessary.

4123 Mr & Mrs C & H Platel

I wonder if you had owned a plot of land for 8 years and been faced time after time with difficulties in achieving planning for reasons outside of your control (eg Welsh Water etc) and could feel your dream slipping away, whether you would feel the same way.

Officer Response

The Authority will be working with Welsh Water to try and resolve drainage issues where it can and comments of the companies Asset Management Plan to try and secure investment in National Park Communities.

4125 Ms Vicky Moller, Cilgwyn Community Group

It is good that this issue is being addressed, hope the suggestions are not taken as criticism.

Officer Response

Noted.

4126 Mr T Marmara, T M Design (Carne) Ltd

PCNP should run advisory seminars for professionals and developers to initially comprehend the processes and discuss and question. Drop-in afternoons are not sufficient. The proposed processes are inevitably going to extend the planning application. How quickly can other partners ie Housing Associations, respond to proposals.

Officer Response

Noted.

Developers should engage with registered social landlords before submitting a planning application and have agreed transfer arrangements and signed section 106 legal agreements to be submitted with the planning application thus reducing any potential delay in determining planning applications. No change necessary.

4127 Mr Guy Thomas, Guy Thomas & Co

The proportion of homes available to purchase on favourable terms is only 33%. The micro regulations controlling price make it unlikely that any “arms length” transactions will take place on the prescribed terms. 2. Removing prescriptive apportionment between tenures and see what if any / affordable homes can be created for either sector.

Officer Response

The table in section 14 sets out what is likely to be required based on evidence of need. This reflects national planning policy - see paragraph 9.2.15 Planning Policy Wales Edition 3 July 2010- it is important that authorities have an appreciation of the demand for different dwelling sizes and types of housing (i.e. intermediate and social rented) in relation to supply so that they are well informed in negotiating the appropriate mix of dwellings for new developments.

4127 Mr Guy Thomas, Guy Thomas & Co

The coastal communities of the UK attract a non-contributing element of society. Your policy appears directed towards these people with whom the electorate has recently expressed its disapproval.

Officer Response

The delivery of affordable housing is the current Welsh Assembly Government's priority. Any change in approach may mean a need to revisit the Authority's approach. Members would be advised if that happens.

'Draft' Policy of this type invariably becomes adopted policy without apparent scrutiny by members. The above is now an extremely radical policy.

The members should consider if the aims and objectives of a Coastal National Park can or should encompass such a radical policy. The current WAG affordable homes policy has been actively promoted as part of the Wales One agenda. The policy will no doubt be reviewed when the new Assembly Government is installed in May. It would seem prudent for you to withdraw your draft SPG and redraft it to reflect new policy and the responses to this consultation exercise.

Hopefully eventually a workable policy may evolve that encourages the local indigenous population to work hard and mutually support each other to provide homes in their home areas. Regrettably in my opinion the current draft is too extreme to warrant a response to detailed statistics.

Officer Response

Members to note. The Authority has recently adopted the Local Development Plan which has been put in place following intensive scrutiny and examination. The Authority is obliged to set in place guidance and implement the policies of the Plan. Members would of course be asked to revisit any established policy and guidance should new policies emerge from the Welsh Assembly Government.

4. Removing Section 106 "Infrastructure Levy" Tax from affordable housing could help bridge the cost divide.

Officer Response

The approach set out in the Plan and guidance is to seek to prioritise the delivery of affordable housing where meeting all the policy requirements would make it unviable as long as this would not overburden existing community infrastructure. (Policy 45 last paragraph) The authority cannot 'ignore' the other associated community demands made by housing particularly where this would mean that the off site services would effectively have to be borne by other developments or through the public purse (paragraph 3.18 Inspector's Report).

4128 Mr S Thomas, Ashwood Homes Property Development

With regard to the affordable housing target of 530 units you have set, that would seem to be very optimistic, given the present economic climate, conditions and restrictions. In our view the onus for affordable housing should be with the Local Housing Association, not with Developers. We have read previously that Councillor Michael Williams expressed concerns that these sites would be mothballed for years if this policy was implemented. It would seem that he was correct given that there are no sites being developed locally at this time.

It is very likely that all other Developers will agree that, given such impossible financial demands imposed by this policy, there will be no incentive to build any properties within the National Park during that period.

We cannot stress enough how opposed we are to this, and we see this as effectively a tax which would put huge strain on ours and other businesses in the locality resulting in many job losses, and we would welcome your comments on these points.

Officer Response

it is national planning policy that all new market housing may contribute to meeting the need for affordable housing (paragraph 9.2.16 of Planning Policy Wales Edition 3). The approach set out in the Local Development Plan has been tested through Examination. Individual applications can be tested for viability and there is an opportunity for review if targets are not being met.

4129 Mr Andrew Davies-Wrigley, Pembrokeshire County Council

See email.

Officer Response

See response to Q1.

4130 Mr Adrian Lort-Phillips, Lawrenny Enterprises Ltd

1. THIS DRAFT SPG IGNORES NATIONAL PLANNING ADVICE ON THE STARTING POINT FOR ALL NEGOTIATION ON AFFORDABLE HOUSING.

All national guidance hitherto adopted requires a Local Authority to establish and quantify local needs for affordable housing via clearly set out consultation procedures. Both Tan 2 and Tan 6 require Local Authorities to establish the level of local need based on up to date surveys. TAN 2 (4.1 policy map) requires (key step 3) a Local Market Housing Assessment (LHMA) to be undertaken in assessing need for affordable housing and requires the Housing Authority to lead the process. The current SPG as it stands would undermine this approach by allowing unqualified officers to set arbitrary levels of affordable housing within settlements regardless of proven need. This will inevitably lead to a situation where an excess of locally required affordable housing on non RSL sites leads to the importation of occupants who do not satisfy local needs nor have any kind of local connection. If so that would undermine all previous local needs criteria and social cohesion within settlements.

Officer Response

The guidance is drafted in accordance with national planning policy and the adopted Local Development Plan. The commentator appears to be unaware of the detailed evidence used in the preparation of the Local Development Plan and the scrutiny that Plan was under at Examination.

2. THIS DRAFT SPG UNDERMINES NATIONAL PLANNING ADVICE THAT SEEKS TO IMPROVE DESIGN, SUSTAINABILITY AND STANDARD OF BUILD

This SPG prioritises provision of affordable housing above all other criteria including quality of design, sustainability and standard of build. It threatens to unravel long held NPA responsibilities and purposes, not to mention current and national rural policies. In practice the result will be that here in the PCNP where an outstanding natural environment should be matched by high quality of design in rural villages will be the very place where this will be prevented from happening.

Officer Response

Please see separate Officer response regarding prioritising the delivery of affordable housing. Issues surrounding the principles set out in the Plan should have been raised at the point and time the Plan was made available for consultation.

3. THIS DRAFT SPG WILL HAVE THE EFFECT OF DESTROYING INVESTMENT IN RURAL COMMUNITIES BY REMOVING VALUE FROM KEY BUSINESSES

According to Tan 6 under sustainable rural communities “the overall goal for the planning system is to support living and working rural communities in order that they are economically, socially and environmentally sustainable”. This SPG undermines that key objective. Most small sites in rural areas are owned by private developers including farmers. The subsidy payable by them to support arbitrarily demanded affordable housing will directly affect their ability to reinvest, modernize, improve farm profitability and offer local working premises for residents. Housing will either not be built at all or if it is, to a low standard incompatible with standards to be expected within the National park. Opportunities for live/work schemes will be compromised

Officer Response

Please see response regarding the Authority's approach to monitoring. The guidance provides detail around the adopted policies of the Plan. Issues surrounding the principles set out in the Plan should have been raised at the point and time the Plan was made available for consultation.

4. THIS DRAFT SPG FURTHER REMOVES IMPORTANT DECISION MAKING FROM LOCAL DEMOCRATIC INSTITUTIONS AND STAKEHOLDERS AND INTO THE HANDS OF UNELECTED, UNQUALIFIED PERSONNEL

The LDP established the useful concept of listed Rural Centres outside the main towns. These settlements already provide some community facilities. The concept is accepted that some socio-economic development accompanied by additional housing would strengthen viability and improve existing facilities. To reach this stage these settlements have already demonstrated a level of self help and civic responsibility. It is unthinkable not to involve them closely in the future development of their communities together with rural housing enablers. (Tan 6 4.2.3 again)

Officer Response

The Plan was developed with the benefit of a series of consultations including local community panels. The decision making of the Authority is vested in the Authority's membership on the advice of professional officers. The Plan has also been scrutinised by an Independent Inspector of the Welsh Assembly Government.

5. THIS DRAFT SPG IS IN DIRECT CONFLICT WITH NATIONAL POLICY ON CODE FOR SUSTAINABLE HOMES TARGETS

It was confirmed when we attended a consultation surgery that the NPA is now ready to enforce, by capping sale or rental prices, abandonment of previous Assembly intentions that new build should target sustainability code 5. Officers accept that future viability assessments will effectively make code 3 the best that can be attained. This is depressing and damaging to both conservation and sustainability, both key NPA purposes. There seems no conception that affordability in housing is based not just on build price but on future running costs too.

Officer Response

The Authority is aiming to achieve all the policy requirements including the Code for Sustainable Homes national requirements but the Plan had to set out its priorities where all demands could not be met. Given the importance of affordable housing delivery for this National Park then this is the priority that is set out in the Plan. Issues surrounding the principles set out in the Plan should have been raised at the point and time the Plan was made available for consultation.

6. THIS DRAFT SPG SEEKS TO FORCE MEMBERS' HANDS TO PUT ARBITRARY DEMANDS ON AFFORDABILITY ABOVE ALL OTHER CONSIDERATIONS

The whole point of WAG's TAN guidance is to introduce flexibility into the planning system because it is well known there is not ONE SIZE FITS ALL answer. Perhaps tellingly, it was revealed in surgery discussions that the officers felt they had been pressured by WAG, (shorthand for the minister) to ensure that the provision of affordable housing should take precedence over other PCNPA statutory functions. In other words, aspirations via TANs to build better designed, more sustainable and attractive houses, cheaper to run once built should be abandoned; aspirations to support and enhance rural centres and support rural businesses should be discarded.

Officer Response

The rationale for the policy approach set out in the Plan is set out in the evidence base to the Plan. Issues surrounding the principles set out in the Plan should have been raised at the point and time the Plan was made available for consultation.

7. THIS DRAFT SPG IF ADOPTED WILL KILL INVESTMENT IN HOUSING AND JOBS UNTIL IT IS (INEVITABLY) REVERSED, STIFLING ANY HOPE OF RURAL CENTRES ACHIEVING SUSTAINABLE GROWTH OUT OF THIS RECESSION

The suggestion, accepted by the Inspector that the proposed policy should be reviewed if sites do not come forward by 2014 will in practice simply freeze future provision. Given the time needed to bring sites through the planning system, little or no new housing (affordable or otherwise) is likely to be built within the next 7 or 8 years. The question must be asked whether this is the underlying officer led agenda, particularly as they seem to anticipate a slight decline in the Park population.

This, combined with a downward pressure on house building of all kinds, exacerbated by the measures proposed in the SPG, will inevitably lead to an increase in the value of existing housing putting it further beyond the reach of local people.

In 20 years time, unless these policies are reversed, we can expect the population of the Park to consist predominantly of wealthy second home owners and holiday rental accommodation, thus fatally undermining social cohesion and economic viability of small rural settlements.

Officer Response

Opinion noted. The objective of the Plan is to deliver affordable housing and monitoring system is in place as a safeguard for the Plan's implementation. Time is needed for policies to 'bed down' and this is reflected in the Inspector's recommendation. All the evidence submitted to Examination and the policy approach suggested was to address the lack of affordable housing available for the younger population of the National Park. Issues surrounding the principles set out in the Plan should have been raised at the point and time the Plan was made available for consultation.

The Three Dragons viability test is very much dependant on the quality of the data inserted into it. Most crucial is the value of land, but also development cost and professional fees. This is fundamental. How is the decision on the data to be inserted to be arrived at? Designing a housing development site is not all about viability based on a tool. It is also about location and context. Design traditionally has been a high priority in the Parks and inevitably can add to development costs in terms of build costs and professional fees. Development costs per plot in the Park could and often is far higher than in say the Pembrokeshire County Council development control area as the economy of scale is not usually present in terms of the size of development, (no of dwellings provided per development) and also the repetition is less in order to respect design and context issues.

Officer Response

Architects fees as I understand it relate to a percentage of development cost and the more costs to the development then the higher the amount received. It is also understood that the percentage charged doesn't vary within the County.

Appendix C to the Affordable Housing Supplementary Planning Guidance Report

Reference	Change Proposed
Summary Table, page 10 and where relevant	<p>Amend to advise that there are two types of affordable rental properties:</p> <ul style="list-style-type: none"> ▪ Rental properties sold to a Registered Social Landlord: Rental properties can be sold at either 40% of Acceptable Cost Guidelines or 100% of Acceptable Cost Guidelines to Registered Social Landlords (see Table in Section 13). Rents charged would respectively be benchmark rents or within the local housing allowance (see Table in Section 15). ▪ Rental properties retained privately: Rents charged would be either benchmark rents or within the local housing allowance – see approach to rental properties sold to a Registered Social Landlord for further guidance. <p>This will ensure the terminology used in the Guidance is compliant with Technical Advice Note 2, paragraph 5.1 and 5.2 and that clear guidance is provided on where benchmark rents and rents within the local housing allowance will be required.</p>
Design Requirements	Update to acknowledge that Social Housing Grant is unlikely to be available and in the absence of Social Housing Grant accommodation built without Social Housing Grant and transferred to a Registered Social Landlord will be required to meet the Welsh Housing Quality Standards.
Paragraph 5.2 and 7.1	Refer to just housing officers as Officers here will rely on the expertise of Pembrokeshire Housing Authority to assess who is in housing need. This ensures consistency with the approach set out in Section 11.
Paragraph 5.4	Delete as Social Housing Grant is unlikely to be available.
Section 13 Depot Site Crymych	Change the % Acceptable Cost Guideline to 40% to reflect the fact that the % requirement for affordable housing has been reduced from 100% to 50% and 100% Acceptable Cost Guideline support is no longer required.
Section 10.6	Include information on the legal agreement service provided by the County Council.
Glossary	Delete explanations of median wage level and intermediate rents as these are no longer referred to in the document.
Section 19 Template Agreements	Update to take account of current review of the Authority's template agreements (to do)

APPENDIX D

SUPPLEMENTARY PLANNING GUIDANCE

Pembrokeshire Coast National Park Local Development Plan

AFFORDABLE HOUSING

Deleted: DRAFT

Deleted: (SPG)

PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY
(WORKING DRAFT March 2011)

Deleted: September

Part 1

1. Purpose of this guidance	3
2. The Policies	4
3. What is meant by affordable housing?	6
4. On which sites should affordable housing be provided, and how much?	8
5. How much will a developer receive for building or renting affordable homes? ..	9
6. Can the developer provide affordable housing on a separate site or provide land for affordable homes instead of building them?	10
7. What happens to the homes when they are built – who manages them?	11
9. What if affordable housing requirements make a proposal unviable?	13
10. Other factors to consider	14
11. What does a developer need to do when submitting a planning application that includes affordable housing?	17

Part 2

12. Glossary	19
13. Affordable housing requirements on allocated sites.....	22
14. On-site affordable housing requirements	24
15. Affordable rents, low cost home prices, acceptable cost guidelines and other costs.....	25
16. The process and criteria for deciding who is eligible for affordable housing. 26	
17. Information required for developer viability appraisals.....	30
18. Useful contacts	32
19. Template section 106 agreements.	34
20. Affordable Housing Statement.....	35

Part 1

1. Purpose of this guidance

This [Supplementary Planning Guidance](#)¹ provides information on the way in which Development Plan policies on affordable housing² will be applied in Pembrokeshire Coast National Park. Planning applications for housing will therefore be assessed against this guidance. Pembrokeshire County Council [is](#) preparing [its](#) own Supplementary Planning Guidance which should be referred to in areas outside the National Park.

Deleted: [supplementary](#)

Deleted: [planning](#)

Deleted: [g](#)

Deleted: (SPG)

Deleted: will

Deleted: be

Deleted: their

Deleted: S

Deleted: P

Deleted: G

This [supplementary planning guidance](#) is divided into two parts.

Part 1 explains the broad implications of the policy including:

- defining affordable housing (section 3);
- explaining the policy requirements in terms of proportions of affordable to market housing required (sections 4 and 14);
- listing the options for provision of affordable homes such as giving land, or developing and selling completed homes, to a [Registered Social Landlord](#)³ (section 7); and
- issues relating to the sale or management of affordable housing (section 7 and 15).

Part 2 provides more detailed information on issues such as:

- the steps a developer should take when considering a proposal including affordable housing (section 11);
- how housing need is defined (section 16);
- rent levels and the income a developer might receive for selling affordable homes (section 15); and
- useful contacts for further information (section 18).

The costs, income and rent examples contained in Part 2 will change over the life of the Guidance. Part 2 of the on line version of this Guidance will be updated when necessary and should always be referred to when considering proposals or submitting a planning application.

¹ See glossary

² [See glossary](#)

³ See glossary

2. The Policies

- 2.1 The policy context for decision-making in planning incorporates policies and guidance issued at a national level by the Welsh Assembly Government and at a local level by Pembrokeshire Coast National Park Authority. Deleted:
- 2.2 National planning policy on affordable housing is contained in Planning Policy Wales, Edition 4 (July 2011)⁴, and supplemented by further guidance in Technical Advice Note 2: Planning and Affordable Housing (2006).⁵ These documents establish and explain the role of Local Planning Authorities in providing affordable housing and set out what information and policies are required in the Development Plan. Deleted: 3
Deleted: 2010
- 2.3 The Pembrokeshire Coast National Park Authority Local Development Plan, adopted in September 2010, contains Policy 45 on affordable housing. Other policies also refer to affordable housing, in particular Policy 7 – Countryside, Policy 43 – Protection of Employment Sites and Buildings, and Policy 48 – Community Facilities and Infrastructure Requirements. Deleted: policy

Policy 45 AFFORDABLE HOUSING (Strategy Policy)

To deliver affordable housing the National Park Authority will as part of the overall housing provision:

- a) Seek to negotiate 50% affordable housing to meet the identified need in developments of 2 or more units in housing developments in all Centres identified in the plan area with the following exceptions where a higher percentage will be negotiated: Tenby (60%), Newport (70%), Saundersfoot (60%), Dale (80%), Dinas Cross (100%) and New Hedges (60%). One site at Crymych is allocated for 100% affordable housing.
- b) Allow the exceptional release of land within or adjoining Centres for affordable housing to meet an identified local need. Where an affordable housing need has been identified prioritise affordable housing provision in countryside locations through filling in gaps or rounding off or through conversion. 50% affordable housing to meet an identified need in developments of 2 or more residential units will be sought.

⁴ [Weblink to Planning Policy Wales 4th edition](http://wales.gov.uk/topics/planning/policy/ppw/;jsessionid=zG5vN22GnL9CKvZfvTh9sh3CGP33LgJKn5Xv565TQ43XRLhvpjhF!-547148533?lang=en)
<http://wales.gov.uk/topics/planning/policy/ppw/;jsessionid=zG5vN22GnL9CKvZfvTh9sh3CGP33LgJKn5Xv565TQ43XRLhvpjhF!-547148533?lang=en>

⁵ [Weblink to Technical Advice Note No.2: Planning and Affordable Housing \(2006\)](http://wales.gov.uk/topics/planning/policy/tans/?lang=en)
<http://wales.gov.uk/topics/planning/policy/tans/?lang=en>

- c) **Seek a commuted sum to help with the delivery of affordable housing on housing developments below the threshold of 2 units (i.e. on proposals for single residential units).**

When considering a new use for a redundant community facility an employment use or affordable housing will be prioritised. When considering a new use for an employment use a community use such as affordable housing provision will be given priority. 50% affordable housing to meet an identified need in developments 2 or more residential units will be sought.

Where it can be proven that a proposal is unable to deliver (i.e. the proposal would not be financially viable) in terms of the policy requirements of the Plan (i.e. for affordable housing provision, sustainable design standards expected and community infrastructure provision) priority will be given to the delivery of affordable housing in any further negotiations provided that it can be demonstrated that the proposal would not unduly overburden existing community infrastructure provision.

The affordable housing target for the Plan period is 530 residential units.

3. What is meant by affordable housing?

- 3.1 Affordable housing⁶ is housing available to people in housing need (section 16) for sale or rent below market rates.

The affordable housing to be provided by developers will be a combination of:

Affordable Housing for Rent
OR
Low Cost Home Ownership⁷

- 3.2 This guidance sets out the National Park Authority's preferred options for providing affordable housing below. However other solutions will be considered such as shared equity. Alternative solutions must be affordable and available to people in need as identified or agreed by the Authority.

- 3.3 All affordable homes must remain affordable for initial and subsequent tenants or buyers, as it is important to ensure future generations have suitable housing choices available to them. The means of ensuring affordability in perpetuity⁸ is through legal agreements (known as Section 106 legal agreements⁹) between the planning authority and the developer. Developers will be expected to submit draft legal agreements with their planning application. Section 19 lists Section 106 templates provided on our website and developers are encouraged to use them. There is an administration charge of £500, payable to Pembrokeshire County Council, for overseeing the legal agreement and monitoring process.¹⁰

Deleted: section

Deleted: Planning

Deleted: Authority

Deleted: Developer

Deleted: section

Affordable Housing for Rent

- 3.4 Affordable housing for rent will be either rented by a Registered Social Landlord or privately.

Deleted: social

Deleted: intermediate rented

- 3.5 Affordable Rental properties sold to a Registered Social Landlord: Rental properties can be sold at either 40% of Acceptable Cost Guidelines¹¹ or 100% of Acceptable Cost Guidelines to Registered Social Landlords (see Table in Section 13). Rents charged would respectively be benchmark

⁶ See Glossary

⁷ See Glossary

⁸ See Glossary

⁹ See Glossary

¹⁰ update needed new template from PCC

¹¹ See Glossary

rents¹² or within the local housing allowance (see Table in Section 15). **Affordable rental properties retained privately:** Rents charged would be either benchmark rents or within the local housing allowance – see above approach to rental properties sold to a Registered Social Landlord for guidance. These rent levels are below market rents.

3.6

3.7

3.8 Developers that wish to sell affordable homes to an **Registered Social Landlord** should contact them for an indication what price they will be willing to pay for those units. This should be done in the early stages of bringing forward a proposal as there will be implications for the costs of a scheme and specific design requirements (see section 10).

Low Cost Home Ownership

3.9 Low Cost Home Ownership is affordable homes for sale below the market price. This is calculated with reference to **Acceptable Cost Guidance**¹⁶, and set at 70% of the **Acceptable Cost Guidance** for a particular property size. This approach is similar to the well established **Welsh Assembly Government** Low Cost Home Ownership model of Homebuy Option properties.

3.10 On most development sites, the affordable housing provided by a developer will need to include both types of affordable housing: affordable housing for rent **and** low cost home ownership. The usual balance of **affordable** rented to low cost homes that developers will be required to provide is set out in **Section 14**.

Other types of affordable housing

3.11 The types of affordable housing described above are preferred by the Authority. However there may be other ways of delivering affordable housing. Any alternatives should be raised in pre-application discussions with the Authority, and with the Registered Social Landlord if it is expected that they will manage/purchase the properties. Any alternative solution must ensure that the properties are affordable, and remain so, and can be provided to someone in need at the same rental level or price described in

Deleted: Social rented is managed by Registered Social Landlords and purchased or built with grant support (Social Housing Grant)

Deleted: ¹³. R

Deleted: are set by the Welsh Assembly Government and are known as bench mark rents

Deleted: ¹⁴. They are

Deleted: Intermediate rented accommodation¹⁵ is housing for rent at levels above benchmark but below market rent levels. This type of accommodation is also usually managed by a RSL, with rent levels set by the RSL at a level above benchmark levels, but still lower than renting on the open market. Intermediate rented homes are built or purchased without Social Housing Grant.

Deleted: Examples of benchmark and intermediate rents are given in section 15. Given the limited availability of social housing grant **most of the affordable housing for rent is likely to be for intermediate rented accommodation.**

Deleted: .1

Deleted: acceptable

Deleted: c

Deleted: g

Deleted: el

Deleted: (ACG)

Deleted: **social**

Formatted: Highlight

Deleted: section

Formatted: Justified

¹² See Glossary

¹⁶ See Glossary

Section 15. There may be circumstances where land would be considered instead of actual affordable homes, or affordable housing being agreed off site. These are dealt with in Section 6.

Deleted: section

Deleted: section

4. On which sites should affordable housing be provided, and how much?

Formatted: Heading 1, Don't adjust space between Latin and Asian text, Border: Top: (No border), Bottom: (No border), Left: (No border), Right: (No border)

4.1 Affordable housing must be provided on any proposal for 2 or more homes. On proposals for one home a developer will be required to pay a financial contribution - see Section 10.

Deleted: of £30,000 to provide affordable housing, known as a commuted payment

4.2 Land for housing development is identified in the Local Development Plan. These sites are known as allocations and a detailed breakdown of affordable housing requirements by each allocated site is given in Section 13. On all other housing proposals the following percentage of homes must be affordable:

Deleted: This is the equivalent to the cost of providing a serviced plot of land for affordable housing and will be payable on the date the property is first occupied.

Deleted: section

- 60% in Tenby, Saundersfoot and New Hedges
- 70% in Newport
- 75% in Dinas Cross (although 100% is proposed in the Local Development Plan for the allocated site)
- 80% in Dale
- 50% in Crymych
- 50% in the rest of the National Park.
- 100% on exception sites¹⁸ to meet an identified local need.
- Priority will be given to affordable housing when considering proposals to change the use of a building used for employment or community uses and proposals for conversions.

Deleted: ¹⁷

4.3 Where the percentage of affordable housing required results in a number of units and a fraction of a unit the requirement will be rounded down e.g. 25% of 25 units = 6.5, therefore 6 affordable homes will be expected.

4.4 Exception sites¹⁹ will only be permitted on land within or adjoining Centres listed in polices 2 to 6 of the Local Development Plan, where there are no other suitable sites to meet that need.

Deleted: centres

¹⁸ See Glossary

¹⁹ See Glossary

5. How much will a developer receive for building or renting affordable homes?

5.1 The amount a developer will receive for affordable homes depends on:

- Whether it is kept and managed by the developer, sold to an [Registered Social Landlord](#) or sold to another party (e.g. Community Land Trust)
- Whether it is for rent or for sale;
- The number of bedrooms;
- Its type – house, bungalow or flat.

The approach to charges is described, and summarised in the table, below.

Summary table (see section 15 for ACG and rent levels)

Type of affordable Housing	Price/Rent
Low cost home ownership	70% of ACG
Rental properties sold to a Registered Social Landlord	Rental properties can be sold at either 40% of Acceptable Cost Guidelines or 100% of Acceptable Cost Guidelines to Registered Social Landlords (see Table in Section 13). Rents charged would respectively be benchmark rents or within the local housing allowance (see Table in Section 15).
Rental properties retained privately	Rents charged would be either benchmark rents or within the local housing allowance – see approach to rental properties sold to a Registered Social Landlord for guidance.
Land sold for an exception site to an Registered Social Landlord	To be negotiated but likely to be well below residential land value

- Formatted: Justified
- Formatted: Justified
- Formatted: Justified
- Deleted: Intermediate rented sold to an RSL
- Deleted: Up to a maximum of 100% ACG
- Deleted: Intermediate rented sold to a management company, CLT etc.
- Formatted: Justified
- Deleted: To be negotiated privately
- Deleted: Social rented sold to an RSL [1]
- Formatted: Justified
- Deleted: Intermediate r... [2]
- Deleted: lance
- Deleted: ACG)
- Deleted: intermediate
- Formatted: Highlight
- Deleted: planning and
- Formatted: Justified
- Deleted: registered
- Deleted: s
- Deleted: landlord
- Deleted: 42

5.2 Low cost homes will be sold at 70% of the [Acceptable Cost Guidelines](#) (for the property size and location, a significant discount from market value). [Acceptable Cost Guidelines](#) are provided in section 15 with some examples of low cost home prices and [affordable](#) rents. Applicants to purchase low cost homes must either be registered on the Common Housing Register²⁰ or satisfactorily prove to [housing officers](#) at Pembrokeshire County Council that they are local and in housing need (see section 16 for definitions of local and housing need).

5.3 If the developer sells affordable homes for rent to a [Registered Social Landlord](#) they will usually receive a maximum of [40% of Acceptable Cost Guidelines](#) for the relevant property size and location. [In limited instances 100% will be received – please see Section 13 for further information.](#)

²⁰ See Glossary

5.4

5.5 Where affordable homes are provided for rent by the developer, or another party such as a Community Land Trust or management company, the level of rent charged to tenants will be dependant on whether the property is that which would have received 40% or 100% Acceptable Cost Guideline funding (see section 13 and 15). Benchmark rents will be required for those that would have received 40% Acceptable Cost Guidelines if selling to a Registered Social Landlord. Rents within the local housing allowance would be required for those that would have received 100% Acceptable Cost Guidelines funding.

Deleted: In cases where there is government subsidy available to an RSL, in the form of social housing grant, a developer may receive more money, up to a maximum of the full Acceptable Cost Guideline value for each property.

Deleted: intermediate rent

Deleted: for a list of rental charges

5.6 More information on management alternatives is given in the section 7.

6. Can the developer provide affordable housing on a separate site or provide land for affordable homes instead of building them?

6.1 In most cases we expect developers to construct the affordable homes on the planning application site and sell them to an Registered Social Landlord, or in the case of low cost homes to local people in need of affordable housing. However, with the prior agreement of the Local Planning Authority and a Registered Social Landlord, instead of providing affordable housing a developer may give sufficient serviced land for the affordable housing to the Registered Social Landlord.

6.2 Welsh Assembly Government Technical Advice Note 2: Planning and Affordable Housing advises that affordable housing should normally be provided on site. Off-site provision of affordable housing²¹ will only be allowed in exceptional circumstances such as those described below.

Deleted: ¶

6.3 The onus will be on the developer to set out the exceptional circumstances as to why provision should not be on site and how the alternative proposal will address the affordable housing need identified by the Local Planning Authority. The Authority may consider the following to be acceptable:

- Bringing existing housing into use for affordable housing;
- If the development proposed is some distance from local facilities needed to support people living there and the alternative site proposed by the developer would be closer;

²¹ A section 106 planning agreement will be required to ensure that development does not start until the off site provision has been secured to the satisfaction of the Local Planning Authority.

- Where the off-site provision would lead to a greater number of affordable houses being provided on the alternative site, without compromising the need for mixed and sustainable communities.

7. What happens to the homes when they are built – who manages them?

7.1 Section 3 above describes our preferred type of affordable homes: rented managed by an Registered Social Landlord or privately and low cost home ownership. Nevertheless we will allow developers to sell completed homes to private rental companies, or manage them themselves, providing the rent is as set out in Section 3 and tenants are from the Common Housing Register²² or otherwise agreed as being local and in need by the Housing Authority.

Deleted: social or intermediate

Deleted: ;

Deleted: at

Deleted: or below intermediate rents

Deleted: common

Deleted: housing

Deleted: register

Deleted: Planning and

Self build and Community Land Trusts

7.2 Where an individual wishes to build an affordable unit for themselves or members of their family, they will have to prove that the intended occupant is local and in need of affordable housing, and sign a legal agreement (section 106) restricting, in perpetuity, all future sale prices to an affordable level and occupancy to local people in housing need.

7.3 Where a community is interested in providing affordable housing, a way forward may be to support self-build within the context of Community Land Trusts. Community Land Trusts own land for the benefit of the community, and the people living and working there. The purpose of these Trusts is to create common wealth, in the form of for example, affordable land for housing. These resources are more accessible to the community, stewarded by it, and retained in community control. As with all affordable housing occupancy will be controlled to ensure that it is for local people in affordable housing need.

8. Who is affordable housing for and who decides who can live there?

8.1 Pembrokeshire County Council as Housing Authority for the County, including the National Park, sets the eligibility criteria for defining housing need. Those households falling in to the gold (high priority) and silver (medium priority) bands described in section 16 are considered in housing need, but anyone on the Common Housing Register can bid for social rented housing, albeit priority will be given to those in the gold and silver bands.

Deleted: apply

²² See glossary

8.2 Low cost homeownership and affordable housing to rent however will be for local people in housing need. People on the Common Housing Register can express an interest in buying a low cost home or affordable housing to rent, while in addition developers and homeowners can advertise for potential buyers or tenants. The eligibility of households which are not already on the Common Housing Register will be checked by Officers from the Housing Authority to ensure that they are in the gold and silver band for housing need and also meet the local and financial need definitions.

- Deleted: intermediate
- Deleted: intermediate
- Deleted: common
- Deleted: h
- Deleted: register
- Deleted: officers
- Deleted: housing
- Deleted: authority
- Deleted: ¶

What if on initial or subsequent rent or sales there is no-one eligible for affordable housing?

8.3 Government guidance suggests leaving the control of occupancy to Registered Social Landlords rather than imposing conditions on them.²³ However Registered Social Landlords have agreed, where possible, to encourage local people to join the Common Housing Register and apply for newly available affordable rented homes.

- Deleted: common
- Deleted: h
- Deleted: register
- Deleted: social and intermediate
- Formatted: Highlight

8.4 Where a trust or private management company takes control over affordable rented homes, or the properties are for sale, we will ensure that controls are in place so that they are provided for local households in housing need and that where someone cannot be found, meeting those criteria, that the search for a tenant or buyer can be extended to a wider area. A 'cascade' approach described below will be used.

8.5 If a local person (see section 16), cannot be found to purchase an affordable low cost home ownership property that has been marketed for 6 months at a price agreed by the Local Planning Authority as being affordable it can then be offered to anyone in need of affordable housing in the adjacent Community Council areas²⁴. If after another 3 months the property still hasn't been sold the search can be widened to anyone in need of affordable housing in the whole of Pembrokeshire.

- Deleted: relevant Area Liaison Forum area

8.6 If a local person cannot be found to rent an affordable property within 4 weeks of it being advertised it will be offered to anyone in need of affordable housing in the adjacent Community Council areas. If after another 4 weeks the property is still vacant, the search will be widened and the property offered to someone in need of affordable housing from the whole of Pembrokeshire.

- Deleted: remaining
- Deleted: of the Area Liaison Forum area in which the property is located

8.7 The Authority will monitor and review the operation of the criteria used and the results of the cascade approach and may alter these to meet the

²³ Technical Advice note 2 Planning and Affordable Housing June 2006 section 13.2-13.3.

²⁴ The Authority will use these boundaries as an interim measure while the ChoiceHomes@Pembrokeshire Allocations Policy is being reviewed and the Pembrokeshire County Council's Affordable Housing Supplementary Planning Guidance is being finalised.

- Deleted: Area Liaison Forums (ALFs) are groups of Town and Community Councils. There are six ALFs in Pembrokeshire

general aim of ensuring that affordable housing is efficiently allocated and fully utilised. The Authority may also alter the occupancy criteria used and the cascade to ensure that an appropriate and fair balance is struck between the legitimate aim to be served by affordable housing policies to meet local need, and the effects on those who are excluded from the policy.

9. What if affordable housing requirements make a proposal unviable?

- 9.1 Affordable housing requirements will add cost to a housing development, though it will be partly recovered either through the sale of completed units, or through rent accrued from tenants. The requirements will also lower the value of land.
- 9.2 The viability²⁵ of housing requirements on allocated sites has been assessed using the 3-Dragons Development Appraisal Toolkit, which allows a reasonable amount to be paid to a landowner for the land, and for developers and contractors to make a profit (section 17). However while most allocated sites are on greenfield land, it is recognised that some sites may have constraints or extraordinary costs. Whilst we are willing to negotiate with developers on the level of affordable housing, where viability is an issue, and will take into account extraordinary costs and existing land values, where a proposal cannot deliver the level of affordable housing required by the development plan policies a planning application may be refused.
- 9.3 Where an applicant advises that the cost of providing affordable housing means that the site will not be viable to develop they will be expected to prove this providing a viability appraisal. Section 17 sets out the minimum requirements for an appraisal.
- 9.4 If the Authority is minded to approve a proposal with lower percentages of affordable housing than set in policy 45, because of poor market conditions a short-term permission may be granted²⁶.
- 9.5 **Exceptions Sites:** Negotiations between Registered Social Landlords wishing to develop exception sites and landowners have often failed due to landowner expectations of the value of their land for housing. The purpose of exception sites is to enable affordable housing to be built on land that has a lower value than residential land because it is on a site where housing would not normally be given planning permission. Landowners should

²⁵ See Glossary

²⁶ See Section 5 Emerging Planning Mechanisms Delivering affordable housing using section 106 agreements: A Guidance Update, September 2009 Welsh Assembly Government. Weblink: <http://wales.gov.uk/docs/desh/publications/091015s106guidanceupdateen.pdf>

Deleted: or extra costs affecting viability,

Deleted: or a claw back clause required in a section 106 planning agreement. This is to ensure that if development is delayed and in the intervening period the housing market improves or extra costs fall, and consequently viability improves, the Authority can re-negotiate the level of affordable housing or require a new planning application

Deleted: S

expect that the price they will receive for exception sites will be well below the price for general residential development land, due to the economics of affordable housing funding which do not produce the same value as open market housing and which may result in very little money being available for land purchase. Typically Registered Social Landlords have been unable to consider developing exception sites where land costs are more than £5,000 a plot.

10. Other factors to consider

Design Requirements

10.1 Developers should refer to national guidance on design in Technical Advice Notes 12 “Design” and 22 “Planning for Sustainable Buildings”²⁷ and to other relevant policies in the Local Development Plan and Supplementary Planning Guidance.²⁸

10.2 Schemes should respect the character and distinctiveness of the area in which they are being built and should be externally indistinguishable from general market housing provided on the site. Affordable units should not be concentrated in one area but dispersed in smaller groupings throughout the site. This will help produce mixed and diverse communities.

10.3 It is highly unlikely that Social Housing Grant will be available to support schemes. But if accommodation is built using Social Housing Grant²⁹ it will be required to meet Welsh Assembly Government Development Quality Requirements³⁰. These set out minimum space standards and technical specifications and are available from the Registered Social Landlord (see contacts). The Welsh Assembly Government’s Welsh Housing Quality Standard³¹ will be the standard required for any units transferred to a Registered Social Landlord in the absence of Social Housing Grant.

Deleted: All

Deleted: Design

Deleted: (DQR)

Affordable Housing Contribution - the financial contribution required on single dwelling applications

Deleted: Commuted Payments

²⁷ Weblink to Technical Advice Notes 12 “Design” and 22 “Planning for Sustainable Buildings”
<http://wales.gov.uk/topics/planning/policy/tans/?lang=en>

²⁸ Weblink to the Pembrokeshire Coast National Park Local Development Plan
<http://www.pembrokeshirecoast.org.uk/default.asp?PID=178> and Supplementary Planning Guidance
<http://www.pembrokeshirecoast.org.uk/default.asp?PID=183>

²⁹ See Glossary

³⁰ See Glossary Weblink to Development Quality Requirements:

<http://wales.gov.uk/topics/housingandcommunity/housing/designandconstruction/devquality/?lang=en>

³¹ See Glossary and See weblink: <http://wales.gov.uk/docs/desh/publications/091207housingwhqsguide.pdf>

10.4 An affordable housing contribution of £250 per square metre of the proposed dwelling is required.³² To ease transition it is proposed that the contribution has a phased introduction. From 1st October 2011 the contribution will be £100 per square metre. This will rise to £150 on the 1st October 2012 and from the 1st October 2013 it will be £250. The figure uses Acceptable Cost Guideline figures and will require updating after 2013 as new Acceptable Cost Guideline figures are published. The approach in principle is considered viable and would be comparable with that taken on larger sites.

The contribution will be required as a condition of the permission granted and will be required to be provided prior to first occupancy.

Exemptions: The following exemptions will apply:

- Affordable housing for local people as defined in the supplementary planning guidance
- Replacement dwellings
- Accommodation limited in its occupation by condition or legal agreement, for example as an agricultural worker or managers dwelling or self catering accommodation.³³

If removal of an occupancy condition is sought, and the Authority is minded to allow full residential use, then this will only be approved if it is replaced by an appropriate affordable housing contribution condition.

Spend: In the first instance spend will be restricted to the local Community Council area and land within adjacent Community Councils which lies within the National Park. Any land in these Community Councils which lies outside the National Park would be excluded.

If the money is not spent within 3 years in the local area (as defined in the previous paragraph) the money should be made available to spend on the delivery of affordable housing in the remainder of the Community Council and adjacent Community Council area if outside the National Park.³⁴ This would acknowledge the fact that there are some split settlements where it

³² This is based on the assumption that a charge of £250 per square metre of a reasonably sized market house would be capable of subsidising 30% of the Acceptable Cost Guideline cost of constructing a 2 bedroomed 3 person affordable house.

³³ Please note that Technical Advice Note 6; Planning for Sustainable Rural Communities, July 2010 provides for an occupancy condition for a rural enterprise dwelling which includes the possibility of it either being occupied by a rural enterprise worker or if there are no such eligible occupiers then to those in need of affordable housing (paragraph 4.13.1). It also advises at paragraph 4.13.5 that where **Authorities** are minded to remove existing agricultural occupancy conditions then they could be replaced with a rural enterprise condition. Weblink: <http://wales.gov.uk/topics/planning/policy/tans/?lang=en>

³⁴ Excluding the main towns of the County, Haverfordwest, Milford Haven, Pembroke/Pembroke Dock, Neyland, Fishguard & Goodwick.

would be reasonable to allow spend in the same locality to meet the need. If not spent within 5 years then it should be returned to the applicant. The money will be held by the Housing Authority, as current affordable housing contributions are.

Deleted: A commuted payment of £30,000 towards affordable housing will be required on single market dwellings. This money will be used to provide affordable housing to meet local needs of National Park residents. It is based on what a fully serviced affordable housing plot might typically cost. Households building a dwelling to meet their own affordable housing need, or an essential rural dwelling, will not be required to pay this sum.

Phasing development

10.5 To ensure the timely delivery of affordable housing legal agreements will include a clause requiring a reasonable proportion of affordable units to be occupied before market housing can be occupied. Where appropriate the development will be split into phases with agreed numbers of affordable and market housing to be completed in each phase.

Legal agreements

10.6 Developers will be required to enter in to a legal agreement with the Planning Authority that ensures affordable housing will be available to local people in need and at an affordable rent or price for the lifetime of the home. A list of available template legal agreements is provided in section 19. They are available online and the relevant legal agreement should be completed and submitted with a planning application, along with a separate section 106 for community infrastructure payments (see below). Pembrokeshire County Council will prepare legal agreements on your behalf. The County Council's legal costs are a standard £500 charge. The Council does, however, reserve the right to increase the costs in the event of complicated agreements or protracted correspondence. Draft agreements cannot be issued without site of an Etipome of Title or office copy entries where registered at the Land Registry.

Other planning requirements and their costs

10.7 Supplementary Planning Guidance on planning obligations provides information on what additional requirements developers should be aware of. The Supplementary Planning Guidance sets out what the Authority will expect developers to contribute to ensure the provision of services that will be needed as a consequence of new development.³⁵ These include financial contributions towards education, libraries and community uses, recreation open space, recycling and waste facilities and sustainable transport. These requirements will impact on the cost of development and should be taken into account when negotiating to buy a site.

Deleted: SPG

10.8

However, affordable housing is the County's highest priority and if the cost of other planning obligations makes a site financially unviable consideration

³⁵ Weblink to planning obligations supplementary planning guidance:
<http://www.pembrokeshirecoast.org.uk/default.asp?PID=183>

will be given to reducing some of the obligations. This does not mean that sites which cause severe burdens on public services will be allowed to proceed without any effort to mitigate those effects.

11. What does a developer need to do when submitting a planning application that includes affordable housing?

11.1 This guide sets out what a developer, and planning officers, should consider when dealing with a planning application for housing. The guide cross references to the relevant sections in this [Supplementary Planning Guidance](#) where more information can be found.

Deleted: SPG

Pre-application - Developer

Step 1

Identify:

- A site; (*if an exception site is proposed suggest a range of sites and consult with planning officers to see which might be acceptable*);
- The number and type of market and affordable units (sections 4, and 13);
- The balance of affordable rented and Low Cost Home Ownership (section 14);

If an exception site is proposed, contact the [Housing Authority](#) for proof of need (housing needs survey), or for a self build development evidence of eligibility for affordable housing (section 16).

Deleted: housing

Deleted: authority

Step 2

If selling on to a management company (either [Registered Social Landlord](#) or private) contact the landlord for indication of:

- Willingness to purchase; and
- The price they will pay (section 15).

Calculate the projected income from sales of market and affordable units.

Step 3

Calculate the viability of the scheme, taking into account costs versus income; Negotiate a land price with the land owner.

Step 4

Draw up detailed proposals;
Prepare an affordable housing statement (section 20);
Sign draft s106 agreements (section 19);
Submit planning application.

Post Application – the Planning Authority

Step 5

Check that the scheme is in accordance with all relevant policies and [Supplementary Planning Guidance](#);

Deleted: SPG

Ensure the percentage and type of affordable housing is appropriate (sections 4 and 13);

Where individual properties and exception sites are proposed check housing needs survey and / or eligibility of nominees.

Step 6

Check that the S.106 template matches the number and type of units required; Pass to legal officer to check that the agreement matches all requirements including for community infrastructure and / or community payments, phasing, [Welsh Housing Quality Requirements/Development Quality Requirements](#) etc.

Deleted: R

Deleted: r

Step 7

If all the above steps have been taken:

Sign the section 106;

Recommend for approval.

Post permission – the Planning Authority

Step 8

Check that the development is in accordance with the permission;

Ensure that occupancy and phasing conditions are met;

Ensure the transfer of homes to a [Registered Social Landlord](#) or management company if appropriate;

Deleted: n

Provide a list of affordable properties to estate agents and solicitors operating in the County.

Step 9 – The Housing Authority/Registered Social Landlord

[Housing Authority to nominate³⁶ tenants and buyers for the Affordable units to a management company;](#)

Deleted: [Nominate](#)

[Registered Social Landlord to use ChoiceHomes@Pembrokeshire allocation³⁷ policy or Voluntary Lettings Agreement to find a tenant for properties transferred to the Registered Social Landlord](#)

[Housing Authority to check the eligibility of nominees that are not taken from the Common Housing Register.](#)

Deleted: C

³⁶ See glossary

³⁷ This policy is currently under review (March 2011)

Part 2

12. Glossary

<p>Acceptable Cost Guidelines</p>	<p><u>Acceptable Cost Guidelines</u> is specified by <u>Welsh Assembly Government</u> and represents an opinion of the standard cost of providing affordable housing in a particular location. The <u>Acceptable Cost Guideline</u> is used to calculate the amount of Social Housing Grant that will be awarded to the Local Housing Authority to fund particular affordable housing development projects, usually carried out by <u>Registered Social Landlords</u>. These figures are considered to represent all of the costs of development i.e. land purchase, works and on-costs. Each area in Pembrokeshire is placed in one of four <u>Acceptable Cost Guideline</u> bands to reflect differences in costs such as land. <u>Acceptable Cost Guideline</u> costs are provided in section 15.</p>	<p>Deleted: (ACGs)</p>
<p>Affordable Housing</p>	<p>The definition of 'affordable housing for the purposes of the land use planning system is housing where there are mechanisms in place to ensure that it is accessible to those who cannot afford market housing, both on first occupation and for subsequent occupiers.</p>	
<p>Bench Mark Rents</p>	<p>Rent levels set by the Welsh Assembly Government which are affordable and are the maximum an <u>Registered Social Landlord</u> can charge where they have received grant funding for affordable homes.</p>	
<p>Common Housing Register</p>	<p>A register for people who wish to be considered for social rented accommodation owned by Pembrokeshire County Council, Pembrokeshire Housing, Cymdeithas Tai Cantref and / or Cymdeithas Tai Dewi Sant. Applicants are put in bands. Applicants in the gold and silver band have been assessed and found to be in housing need.</p>	
<p><u>Development Quality Requirement</u></p>	<p>Minimum space and technical standards required of all affordable homes constructed with the benefit of Social Housing Grant. These standards are set by the Welsh Assembly Government.</p>	<p>Deleted: Design</p>
<p>Exception sites</p>	<p>These are sites for 100% affordable housing to meet local needs, within or adjoining <u>Centres</u> where housing would not normally be permitted. Allowing housing on land with little or no development value can enable housing to be built at a low cost and sold or rented at affordable levels.</p>	<p>Deleted: centres</p>
<p>Low Cost Home Ownership</p>	<p>Affordable Housing that is available to purchase at a price below what is provided on the open market. Low cost home ownership homes are available to purchase by people in housing need at 70% of the relevant Acceptable Cost Guidance level.</p>	<p>Deleted: Intermediate ... [3]</p>
<p>Nominations</p>	<p>Nomination agreements are used to ensure that the affordable housing units of the development are held for local people in affordable housing</p>	<p>Formatted: Highlight</p>
		<p>Deleted: (LCHO)</p>
		<p>Deleted: Median Wage ... [4]</p>

	need. Those nominated for affordable housing should be listed on Pembrokeshire Common Housing Register which is operated by all social housing providers across the County. The Housing Authority normally requires a proportion of nomination rights at each development.	
Perpetuity	Affordable homes should remain affordable for the lifetime of the property. To ensure affordable housing is affordable in perpetuity, a legal agreement will be required, to ensure that it is of benefit not just to initial applicants but to all subsequent occupiers.	
Registered Social Landlord	Registered Social Landlord is the legal term for a landlord registered with the Welsh Assembly Government. Most are Housing Associations but they may also be trusts or co-operatives. They are run as not-for-profit businesses. Any surpluses are ploughed back into the organisation. They are run by committees or boards of management made up of volunteers. A typical board might include tenants, local authority members, business / professional people and representatives from voluntary organisations. In practical terms it is those Registered Social Landlords supported for development in Pembrokeshire by the Welsh Assembly Government that will be pursuing the delivery of affordable housing under this guidance.	Deleted: (RSL) Deleted: (RSL)
Section 106 Agreements	An agreement made under Section 106 of the Town and Country Planning Act 1990, between a LPA and developers specifying, for instance, that a proportion of a development site be reserved for affordable housing. S106 agreements run with the land and apply to successive owners. The delivery of affordable housing will normally be through a S106 agreement as its future retention is often too complex to be suitable for inclusion within a planning condition.	
Social Housing Grant	The grant paid by the Welsh Assembly Government to Housing Authorities for capital development programmes is called Social Housing Grant.	Deleted: (SHG)
Social Rented Housing	Social Rented Housing is housing available to rent at below market levels. Lower rents are possible because the Government subsidises Housing Authorities and Registered Social Landlords , the main providers of social rented housing in Wales. These landlords share a common goal of meeting housing need.	
Supplementary Planning Guidance	Supplementary Planning Guidance is a means of setting out more detailed guidance on the way in which the policies of a Local Development Plan will be applied.	
Viability	A development scheme is considered viable if overall revenue is greater than costs, by enough of a margin for the developer to make a reasonable profit and the landowner to be paid an acceptable residual value. Pembrokeshire Coast National Park Authority	Deleted: Pembrokeshire County Council

	assesses the viability of development sites using the 3-Dragons Development Appraisal Toolkit (see section 17)
<u>Welsh Housing Quality Standard</u>	<p><u>The Welsh Assembly Government believes that everyone in Wales should have the opportunity to live in a good quality home within a safe and secure community. To help achieve this aim we published the Welsh Housing Quality Standard. This standard requires all social landlords to improve their housing stock to an acceptable level by 2012.</u></p>

13. Affordable housing requirements on allocated sites

Affordable housing and the maximum level of funding a developer may receive if selling to an Registered Social Landlord. This table is based on viability testing. Sites highlighted in yellow are likely to need 100% Acceptable Cost Guidelines to be viable with other sites requiring 40% Acceptable Cost Guidelines.

Site ID	Location	Site Name	Number of Units	Percentage of Affordable Housing	Amount of Affordable Housing	Maximum % A C
HA734	Broad Haven	South of Driftwood Close	8	50	4	40
MA776	Broad Haven ¹	north east of Marine Road	35	37	12	40
HA750	Crymych	Depot Site	15	50	8	40
HA382	Dale	Castle Way	12	80	10	100
HA387	Dinas Cross	Opp Bay View Terrace	12	100	12	100
HA732	Herbrandston	East of Herbrandston Hall	12	50	6	40
HA559	Lawrenny	Adj Home Farm	30	50	15	40
HA821	Jameston	Green Grove	5	60	3	40
HA730	Jameston	Opposite Bush Terrace	35	50	18	40
HA848	Manorbier Station	Field opp Manorbier VC School	19	50	10	40
HA895	Manorbier Station	Land part of Buttylands	15	50	8	40
HA813	New Hedges	Rear of Cross Park	30	60	18	40
HA825	Newport	North of Feidr Eglwys	20	70	14	40
HA384	Solva	Adj Bro Dawel	18	50	9	40
HA792	Solva	Bank House, Whitchurch Lane	12	50	6	40
HA737	St Davids	West of Glasfryn Rd	90	50	45	40
HA789	St Davids	Adj Ysgol Bro Dewi, Nun St	10	50	5	40
HA733	St Ishmaels	Adj School	40	50	20	40
HA377	Tenby	Brynhir	168	60	101	40
HA723	Tenby	Former Cottage Hospital site	10	60	6	40
HA724	Tenby	Rectory Car Park	50	60	30	40

Deleted: 42

Deleted: G

Deleted: a developer will receive if selling to an RSL

Deleted: 42

Formatted Table

Deleted: 42

Deleted: 100

Deleted: 42

Deleted: 42

Deleted: 42

Deleted: 42

Deleted: 42

Deleted: 42

Deleted: 42

Deleted: 42

Deleted: 42

Deleted: 42

Deleted: 42

Deleted: 42

Deleted: 42

Deleted: 42

Deleted: 42

Deleted: 42

Site ID	Location	Site Name	Number of Units	Percentage of Affordable Housing	Amount of Affordable Housing	Maximum % A C
HA727	Tenby	West of Narberth Rd	25	60	15	40
HA752	Tenby	Butts field	80	60	48	40
HA760	Tenby	Reservoir Site	12	60	7	40
HA738	Trefin	North of Heol Crwys	15	50	8	40

- Deleted: G
- Deleted: a developer will receive if selling to an RSL
- Deleted: 42
- Deleted: 42
- Deleted: 42
- Deleted: 42

14. On-site affordable housing requirements

AFFORDABLE HOUSING REQUIREMENTS

No of beds	Total Percentage of Affordable housing by size	% of Affordable Housing required for rent by size	% of Affordable Housing required for <u>Low Cost Home Ownership</u> by size
1	34	76	24
2	44	65	35
3	19	56	44
4	3	6	34
Overall	100%	67%	33%

Deleted: H

DATED MAY 2010 (to be updated annually)

15. Affordable rents, low cost home prices, acceptable cost guidelines and other costs.

The table below provides an example of rents, costs and prices for different properties. It is based on 2007 [Acceptable Cost Guideline](#) figures (current in 2010) and for band 2. An on line version of this table will be updated when necessary.

Dwelling type	Benchmark rent £/w	<u>Rents within the Local Housing Allowance</u> rent £/w	Acceptable cost guideline	Low Cost Home Price (70% ACG)
1 bed 2 person flat	£56.00	£75.00	£77,000	£53,900
1 bed 2 person house	£66.00	£80.00	Not available	Not available
2 bed 4 person house	£70.00	£100.00	£113,800	£79,100
3 bed 4 person house	££75.00	£105.00	£120,100	£84,000
3 bed 5 person house	Not available	£110.00	£126,900	£88,830
4 bed 6 person house`	£79.00	£110.00	£147,200	£102,900

Deleted: **Intermediate**

16. The process and criteria for deciding who is eligible for affordable housing.

There are two elements to defining need or who is eligible for affordable housing.

A person or household is in housing need if:

- their accommodation is inadequate or unsuitable (accommodation element): and
- They cannot afford to move to more suitable accommodation on the open market (financial element).

The criteria for assessing accommodation need are set out in [ChoiceHomes@Pembrokeshire Allocation Policy](#)³⁸. The criteria are used to place households in different bands according to their housing need. Gold and Silver bands are in high and medium priority need respectively and bronze are low in low priority need. Those who are registered on the Common Housing Register are able to bid for properties that become available and the household with the highest need will be offered the property.

Deleted: Pembrokeshire County Council's Allocations policy for the common housing register

Any one wishing to rent, buy or build there own affordable home must first apply to Pembrokeshire County Council to join the [Common Housing Register](#) so that they can be assessed to see whether they fall within the gold and silver band assessment of need described below.

Deleted: Affordable housing will be provided for those households who are in high and medium need i.e. meet the gold and silver band criteria.

Deleted: common

Deleted: h

Deleted: r

For non [Registered Social Landlord](#) managed affordable housing a person or household would, in addition to being in housing need, also have to be local and in financial need i.e. on too low an income to resolve their housing needs by privately renting or buying a house. The definitions of local and financial need are given below.

Definition of Local Person

A local person is any applicant who:

- Applicants who have continuously lived within the Sustainable Community area as their principal residence for the previous 3 years.³⁹⁴⁰

Deleted: <#>Have a parent or close family member (mother, father, brother, sister, daughter or son) who lives in the area, for whom they would provide or receive support and whose quality of life would be dramatically improved if that person moved closer to them¶
<#>Have lived within the area, on a permanent basis, for the past¶
12 months¶
<#>Currently live on a permanent basis within that area and have lived in that¶
area for 5 years out of the past 10 years¶
<#>Have permanent full time employment within the area and social housing is their only option¶
Have children at the local school

³⁸ This policy is currently under review (March 2011)

³⁹ Sustainable Communities are areas defined in the former Development Plan for the National Park the Joint Unitary Development Plan for Pembrokeshire. The Authority will use these boundaries as an interim measure while the ChoiceHomes@Pembrokeshire Allocations Policy is being reviewed and the Pembrokeshire County Council's Affordable Housing Supplementary Planning Guidance is being finalised. The County Council will also be operating these boundaries until the Council's Affordable Housing Supplementary Planning Guidance is finalised.

⁴⁰ For the purposes of this Guidance Main Settlements(Haverfordwest, Pembroke, Pembroke Dock, Milford Haven, Fishguard, Neyland and Narberth) will be treated as Sustainable Communities in their own right.

- Applicants who have lived in the Sustainable Community for five out of the past ten years.
- Applicants who have previously lived in the Sustainable Community with their family, for at least five years, and have a parent or close family member (child, brother or sister) who still live in the Sustainable Community.
- Have a parent or close family member (child, brother or sister) living in the Sustainable Community Area, for whom they will either provide essential support to or receive essential support from.
- Applicants who are in employment on a permanent contract in the Sustainable Community area or applicants who have an offer to take up employment on a permanent contract in the Sustainable Community area but cannot take up the offer because of the lack of affordable housing.

The ability of Registered Social Landlords to house those in most need should not normally be restricted by planning agreements or conditions⁴¹. However local letting policies have been used to try and attract local people to bid for rented accommodation when it is first made available. Registered Social Landlords do, in any case, operate a local person requirement for a certain percentage of their lets.

Deleted: The "local" requirement is not made of RSL managed properties because they, and the Housing Authority, have a legal duty to house those most in need, in **social rented** accommodation, irrespective of whether they are local.

Deleted: ir

Deleted: social

Deleted: County Council's Housing

Definition of accommodation need – ChoiceHomes@Pembrokeshire Allocations Policy⁴²

Silver Band (medium priority)

- Customers with a need for social housing in a specific area of Pembrokeshire due to a medical or welfare reason as defined within s167(2) of the Housing Act 1996 (as amended)
- Customers who require one additional bedroom for the permanent household (not including access children)
- Existing Pembrokeshire Council or Housing Association tenants underoccupying a property by 1 bedroom and who wish to move to smaller accommodation
- Customers sharing accommodation with family or friends who are not to be rehoused with them
- People who do not own any residential property and are living in the private rented sector on an assured short-hold tenancy
- People who are intentionally homeless
- Owners of property with a social or medical need, which cannot be resolved through the sale or adaptation of their property. Customers living in properties suffering from disrepair that have been confirmed by an environmental health officer and statutory enforcement action is in progress

⁴¹ Technical Advice Note 2 - Planning and Affordable Housing, para. 12.2

⁴² Pembrokeshire County Council is currently reviewing this policy.

- Customers with a medical condition (supported by medical evidence), where re-housing would assist in alleviating the condition (see section 6)

Gold Band (high priority)

- Customers who are in need of a significantly adapted property (major adaptations which could not be achieved in their own home) and who are supported by an occupational therapist recommendation
- People who have been determined to be unintentionally homeless
- Customers who require at least 2 additional bedrooms for the permanent household (not including access children)
- Customers that are unable to succeed to a Pembrokeshire County Council or Housing Association tenancy following the death of the tenant and who have been resident at the property for at least 12 months prior to the death of the tenant
- Existing Pembrokeshire County Council or Housing Association tenants who are under-occupying a property by at least 2 bedrooms and who wish to move to smaller accommodation
- Households with children and who are living in private rented sector accommodation and sharing amenities with other households not related to the customer
- Private sector tenants in accommodation that is confirmed as unfit by an environmental health officer, e.g. in substantial disrepair and/or lacking basic amenities where statutory enforcement action is being taken
- Owner occupiers who live in accommodation which has been confirmed as unfit by an environmental health officer and do not have the financial means to carry out improvements or secure alternative accommodation through the sale of the property
- Customers experiencing severe harassment or threats of violence confirmed by a professional agency and where rehousing is the best option. The Council will seek, in the first instance, to address the problem behaviour of the perpetrator
- Customers suffering from a chronic or serious medical illness (supported by medical evidence) where re-housing is essential and would significantly improve their quality of life
- Customers suffering from a chronic or serious medical illness (supported by medical evidence) where re-housing to a specific area in Pembrokeshire, to either receive support or medical care, would significantly improve their quality of life and prevent hardship
- Customers who meet five or more criteria in the silver band

Definition of Financial Need

If a household is assessed as being on high or medium priority accommodation need i.e. in the gold and silver band on the Common Housing Register then the

Housing Authority may, depending on the type of affordable housing sought, have to do additional financial assessments. This can include assessing whether the household can afford to resolve its situation without subsidy or assistance or ensuring that applicant has sufficient money to pay for the option chosen. The ability to resolve affordability issues on the open market will depend on the relationship between the amount that the household is able to afford and the cost of appropriate local housing. Appropriate local housing is housing in the locality that can be moved into and lived in comfortably without the need for extra capital expenditure. The Authorities will use information on appropriate housing availability⁴³ and pricing (normally at a localised level such as Community Council areas).

Deleted: If a household is assessed as being on high or medium priority accommodation need i.e. in the gold and silver band on the common housing register then the Authorities will have to assess whether the household can afford to resolve its situation without subsidy or assistance.

Deleted: This will depend on the relationship between the amount that the household is able to afford and the cost of appropriate local housing.

Affordability will be checked by using the standard mortgage industry 'income multiplier'. This multiplier will be reviewed regularly and amended as necessary in consultation with the Council for Mortgage Lenders.

For someone on a single income if the price of suitable housing is equal, to or less than, three times their gross salary then it is affordable.

For someone looking for housing with a partner, relative or friend if the price of suitable housing is equal to or less than 2.5 times the joint gross salaries or 3 times the higher salary plus 1 times the lower salary, which ever is the higher, it is affordable.

Evidence of Need

The Common Housing Register is the main source of evidence of housing need.

The register is held by the Registered Social Landlords and Pembrokeshire County Council and includes people requiring social rented housing and those wishing to purchase, but unable to afford, market cost housing.

In addition to the Common Housing Register, local housing need surveys provide evidence of housing need in rural areas.

Deleted: common

Deleted: h

Deleted: r

⁴³ Using the price break of the lowest quartile households should be able to afford at least a quarter of the appropriately sized properties on sale in local estate agents.

17. Information required for developer viability appraisals

Affordable housing requirements were assessed to ensure that they would not make development uneconomic, during the preparation of the Local Development Plan, using the three dragons development appraisal toolkit. The [Development Appraisal Toolkit](#) estimates the total cost of a development scheme including the developer's profit and finance costs, and any exceptional costs, but excluding the cost of land. This is then deducted from the total expected revenue that will be generated, including sales of market housing and income from affordable housing, taking account of any social housing grant and contributions by an [Registered Social Landlord](#). The resulting "residual land value" represents the maximum that the developer can pay for the land and still make a reasonable level of profit in the market conditions pertaining at the time of the appraisal.

Deleted: (DAT)

Where a developer believes that delivering the level of affordable housing stipulated in our policies is not viable we will expect a fully evidenced viability appraisal to be provided explaining why the policy requirements cannot be met and what level of affordable housing provision the developer believes is viable. We will want to run the developer's costs through the Authorities Development Appraisal Toolkit to assess the robustness of the developer's appraisal. **The following information should be provided in a viability appraisal** to enable us to do this. This should not be treated as an exhaustive list, or checklist of minimum requirements, rather a prompt to ensure that these are covered in a full and detailed appraisal.

- Number of market units proposed including a breakdown of bedroom numbers, type (detached semi etc,) and floor area;
- Proposed sale price with evidence justifying the price level;
- Number, type and size of unit for [affordable rent](#) and low cost homeownership
- Sale price agreed with an [Registered Social Landlord](#) or management company;
- Build cost per square metre (with either reference to industry standard [Building Cost Information Service](#) or recent local comparable evidence based on actual contracts and the allowance for code for sustainable homes standards if included) and a breakdown of the elements included in the figure;
- For flats the number of storeys and the type of parking (surface, under storey, or basement);
- Developer profit;
- Exceptional costs attached to the development e.g. sewerage works, raft foundations, flood prevention works, decontamination. To be relevant these must be works that are essential for the development to occur. The cost will be the extra cost that arises from these works. So for example, if raft foundations are required, the cost of ordinary strip foundations will

Deleted: social

Deleted: BCIS

need to be deducted from the cost of the raft foundations to arrive at the extra cost to be incurred);

- Total planning obligations cost incurred by unit;
- Cost of finance;
- Where the proposal is for re-use, conversion or re-development an independent valuation by an Royal Institute of Chartered Surveyors, or equivalent, qualified surveyor/valuer calculating the current land use value of the site;
- Estimated figures for marketing, legal and all other costs of development not included above.

Deleted: S

Formatted: Heading 1, Left, Line spacing: single, Don't adjust space between Latin and Asian text

18. Useful contacts

Pembrokeshire Coast National Park Authority

For National Park Policy queries and housing need figures for the National Park.

Martina Dunne

Head of Development Plans

Pembrokeshire Coast National Park Authority
Llanion Park
Pembroke Dock
Pembrokeshire
SA72 6DY

Deleted: Officer

Tel: 0845 3457275

Fax: 01646 689076

Email: devplans@pembrokeshirecoast.org.uk

Pembrokeshire County Council

Housing

For general housing issues across the County and housing need queries outside of the National Park.

Andrew Davies-Wrigley
Policy Planning and Change Manager,
Social Care and Housing
Pembrokeshire County Council
County Hall
Haverfordwest
Pembrokeshire
SA61 1TP

Tel: 01437 764551

Fax: 01437 776492

Andrew.Davies-Wrigley@pembrokeshire.gov.uk

Eirian Forrest
Section 106 Monitoring Officer
Pembrokeshire County Council
County Hall
Haverfordwest
Pembrokeshire
SA61 1TP

Tel: 01437 764551

Email: Eirian.Forrest@pembrokeshire.gov.uk

Pembrokeshire Rural Housing Enabler

For information on local housing needs survey and rural exception sites

Matthew Owens, Rural Housing Enabler
Meyler House,
St. Thomas Green,
Haverfordwest,
Pembrokeshire,
SA61 1QP

Tel: 01437 774769
Email: matthew.owens@rhe-pembs.co.uk

Pembrokeshire Housing Association

To discuss selling affordable housing units or land on to the [Registered Social Landlord](#) and for information on [Welsh Housing Quality/Development Quality Requirements](#), Rental Levels and Acceptable Cost Guidelines.

Deleted: f Design

Nigel Sinnett
Director of Technical Services
Pembrokeshire Housing Association Limited
SA61 1QP

Tel: 01437 763688
Email: nigel.sinneett@pembs-ha.co.uk

Tai Cantref

To discuss selling affordable housing units or land on to the [Registered Social Landlord](#) and for information of [Welsh Housing Quality/Development Quality Requirements](#), Rental Levels and Acceptable Cost Guidelines.

Deleted: Design

Gareth Thomas
Cymdeithas Tai Cantref
Llys Cantref
Lôn yr Eglwys
Castell Newydd Emlyn/Newcastle Emlyn
Carmarthenshire
SA48 9AB

Tel: 01239 712000
Fax: 01239 712001
Email: garetht@cantref.co.uk

Deleted: davidw@cantref.co.uk

Deleted: Bro Myrddin Housing Association
Mark Richards
Housing Services Manager
Bro Myrddin Housing Association
89 Lammas Street
Carmarthen
SA31 3AP
Phone 01267 232 714
Fax 01267 238107
Email: mark@bromyrdin.org.uk

19. Template section 106 agreements.⁴⁴

Model section 106 agreements are available on the Authority's website. These templates should be used to avoid any delay in processing the planning application.

Templates are available for:

- *Owner Transfers Completed Affordable Housing Units to Registered Social Landlord for 100% Acceptable Cost Guidelines*
- *Owner Transfers Completed Affordable Housing Units to Registered Social Landlord for 40% Acceptable Cost Guidelines*
- *Low Cost Housing for Rent (Private) – Owner Constructs Affordable Housing for Letting direct to Qualifying Persons*
- *Low Cost Home Ownership not transferred to an Registered Social Landlords – Owner Constructs Affordable Housing for sale to Qualifying Persons*

Deleted: 42

Deleted: Intermediate

Formatted: Highlight

⁴⁴ Update needed PCC developing template agreement

20. Affordable Housing Statement

An affordable housing statement brings together all the information necessary for us to process your planning application and will be essential when dealing with full and reserved matters planning applications. For a single property it may simply include evidence that you are local and in need, if proposing a self build affordable unit, and a signed section 106 agreement for low cost homeownership.

For larger sites the following information should be provided:

- The proportion of affordable to market housing (with reference to policy 45 Affordable Housing (Strategy Policy));
- The number, type, and size of dwellings including:
 - bedroom numbers,
 - room sizes (where Development Quality Requirement is required, i.e. where Social Housing Grant is used to support the proposal)⁴⁵,
 - market, affordable rented and Low Cost Home Ownership numbers
 - terraced, flats, detached etc.
- A site plan showing how affordable homes will be integrated into the development;
- For exception sites evidence of need;
- Intended management of affordable homes and transfer arrangements i.e. sell to Registered Social Landlord or management company, Community land Trust;
- Confirmation of transfer arrangements from the Registered Social Landlord management company etc.;
- Signed section 106 agreements;
- Where pre-application negotiations have led to a reduction in the affordable housing requirement additional evidence should include:
 - A viability appraisal
 - Description of the difference between the proposed level of affordable housing and the level required by policy;
 - Justification for the lower requirement including correspondence with planning officers agreeing to the lower requirement.

Deleted: AFFORDABLE HOUSING

Deleted: social

⁴⁵ The Welsh Assembly Government's Welsh Housing Quality Standard will be the standard required for any units transferred to a Registered Social Landlord in the absence of Social Housing Grant.

Page 9: [1] Deleted		Martina Dunne	03/03/2011 15:56:00
Social rented sold to an RSL	See table in section 13. In some cases it will be up to 42% ACG and others up to 100% ACG.		

Page 9: [2] Deleted		Martina Dunne	03/03/2011 15:56:00
Intermediate rent	Intermediate rental charges		

Page 19: [3] Deleted		Martina Dunne	04/03/2011 15:55:00
Intermediate rents	Affordable rents set within housing allowance thresholds. Housing allowance is a benefit payment to people on low incomes. It is only available up to a certain rent level (threshold) beyond which the tenant has to pay the additional costs. By setting intermediate rent within the housing allowance threshold it ensures that rents are affordable. Examples of benchmark and intermediate rents are given in section 15.		

Page 19: [4] Deleted		Martina Dunne	04/03/2011 10:12:00
Median Wage Level	If all wages are ranked in ascending order the value which occurs at the midpoint of the list is the median wage level.		