

HAYSTON DEVELOPMENTS & PLANNING LTD – Mr & Mrs A Evans

Inspector: Mrs Nicola Gulley
Programme Officer: Mrs Caroline Llewellyn
Programmeofficer@pembrokeshirecoast.org.uk
Llanion Park, Pembroke Dock, SA72 6DY
www.pembrokeshirecoast.wales/ldpexamination



The Planning Studio, Hayston Bridge
Johnston, Haverfordwest
Pembrokeshire SA62 3HJ
01437 891 817
07515 851 704
andrew@haystonplanning.co.uk
www.planningpembrokeshire.co.uk

20th June 2019

Examination Hearings – Pembrokeshire Coast National Park Replacement LDP
Site Reference: Land North of the Business Park, Newport.
Candidate Site References: 088A – HA11
Site owners: Mr & Mrs Arwel Evans (Representor No. 4465)

SUPPLEMENTARY HEARING SESSION COMMENTS RESPONSES TO MATTERS 6 & 8

Dear Mrs Llewellyn,

These comments are provided on behalf of Mr & Mrs Arwel Evans by [Hayston Developments & Planning Ltd](#) ahead of representations to be made at the forthcoming Local Plan Inquiry hearings into the Pembrokeshire National Park Authority Local Plan to 2031. The initial comments were made in the LDP2 'Focussed Change' Process, dated 13th February 2019 (Attached as **Appendix A**).

The comments herein are based on the Inspectors questions related to the soundness of the plan and in particular relate to Matters 6, 7 & 8 of the Inspectors "*Schedule of Matters, Issues & Questions*".

Matter 6 – Housing Provision and Distribution

3. Is the housing supply calculations of 1,150 appropriate?

d) How has the flexibility allowance of 16% been defined, and is it based on robust evidence?

4. Will the Plan deliver the housing requirement?

a) Are the site allocations available and deliverable within the anticipated timescales? Are the allocations supported by a robust and comprehensive site assessment methodology, free from significant development constraints and demonstrated to be economically viable?

6. Is the Plan's housing strategy sufficiently flexible to respond to changing circumstances?

Observation 1. It is considered that there is insufficient flexibility allowed in the Newport area as two of the three proposed residential allocations HA1 and HA2 are advanced on site today and very likely to be completed by December 2020. Plus the current proposal is for no

delivery of either market or affordable housing at HA3 until January 2026 and possibly not then, as the current proposal is to restrict the numbers delivered to be 10 before and 5 after 2031.

In addition the imposed phasing calls into question the viability of commencing construction until a 15 unit development can be progressed.

Matter 8 - Allocated Sites

Matters to be addressed for each site where appropriate:

- *Site name/ref and scale parameters? **Land North and East of Newport Business Park, Site No 088A HA3, Representor Number 4465, (15 Units)***
- *What is the current use of the site? **Under pasture***
- *What is the proposed use of the site? **Housing, including an element of affordable housing***
- *Is the identification of the site essential to the soundness of the Plan? **Yes as the proposed allocation is consistent with the identification of Newport as a Local Centre (Policy 3) and the identified need for a wide range of housing – both market and affordable. This is the only housing allocation for this major town in LDP2 so has an important role to play.***
- *Are there any significant obstacles to development within the Plan period? **None – other than questions of viability which centres on a requirement for a 50% contribution to affordable housing and phasing as determined in the LDP that involves up-front investment in infrastructure but a staged return through sales.***
- *What are the timescales for delivery? **The applicants and owners wish to see the development of HA3 undertaken in the early years of the Plan period with a timetable described as in para 2.6 of our Focussed Change submission of 13th February 2019.***



Aerial photograph of Focussed Change site (Source: Google Earth 2009)

SUMMARY OF BACKGROUND

In respect of Candidate Sites and possible allocations for residential use, the initial representation by Hayston Development and Planning Ltd exceeded that currently proposed allocation in the Deposit version of the Replacement LDP, as shown on the aerial photograph above.

The only other allocations for Newport which is designated as a Local Centre in the Draft LDP (Policy 3) are:-

- HA1 North of Feidr Eglwys (35 units of which 40% or 14 are affordable) and
- HA2 Parrog Yard & Pottery Site (12 units of which 66% or 8 are affordable).

In respect of HA1, which is described to be for 35 properties of which 14 are for affordable housing (by Wales and West Housing Association), the site is now advanced and units are being completed..



***Site HA1. Access point from Feidr Bentinck to 35 unit site of which 14 are affordable homes.
There is a second access from Feidr Eglwys***

In respect of HA2, the site which is being developed in two stages; the first stage for 8 social housing properties for local needs also by Wales and West is almost complete whilst the second stage which is for four market properties has recently commenced.



Former Pottery Site HA2. Social housing units near completion and view looking south of the commenced second phase for market housing

HA3, the applicants' site, is therefore the only proposed allocation that has not been commenced and which is proposed to meet the estimated need within the next 12 years.



Candidate Site Reference 88A, Newport showing existing field access from Feidr Pen-y-Bont and roadside hedge. Existing residential properties lie to the left



View across Candidate Site 88A showing existing screening on the northern boundary. Field slopes gently from south to north



Southern boundary hedge to HA3 and showing further mature hedge to rear of applicants' ownership

In respect of HA3, earlier proposals by the NPA indicate that the 15 property site should be developed in two stages; *“the NPA envisages only 10 homes will be completed in the five year period 2026-2031 leaving the remaining 5 to be completed post 2031”* (Source:- Appendix 2 Housing land Supply as at April 2018 by NPA and as referred to in our Focussed Change submission dated 13th February 2019).

It is contended that this envisaged phasing together with the proposed 50% affordable homes draws into question the viability of developing the allocation other than as a single development because of the requirement to install the necessary infrastructure (road, drainage, foul water disposal etc) to cater for the whole development whilst having to phase receipts from property sales over a much longer period. The land owners and applicants are also seeking to deliver this site in the early years of the Replacement Plan.

In the letter to the local newspaper ‘The Western Telegraph’ published May 29th 2019, Mr John Griffiths of Newport Town Council, makes the following point in respect to Newport and development:-

“Holiday homes make up in excess of 30 per cent (possibly significantly more) of the housing stock. The proportion grows year on year”.

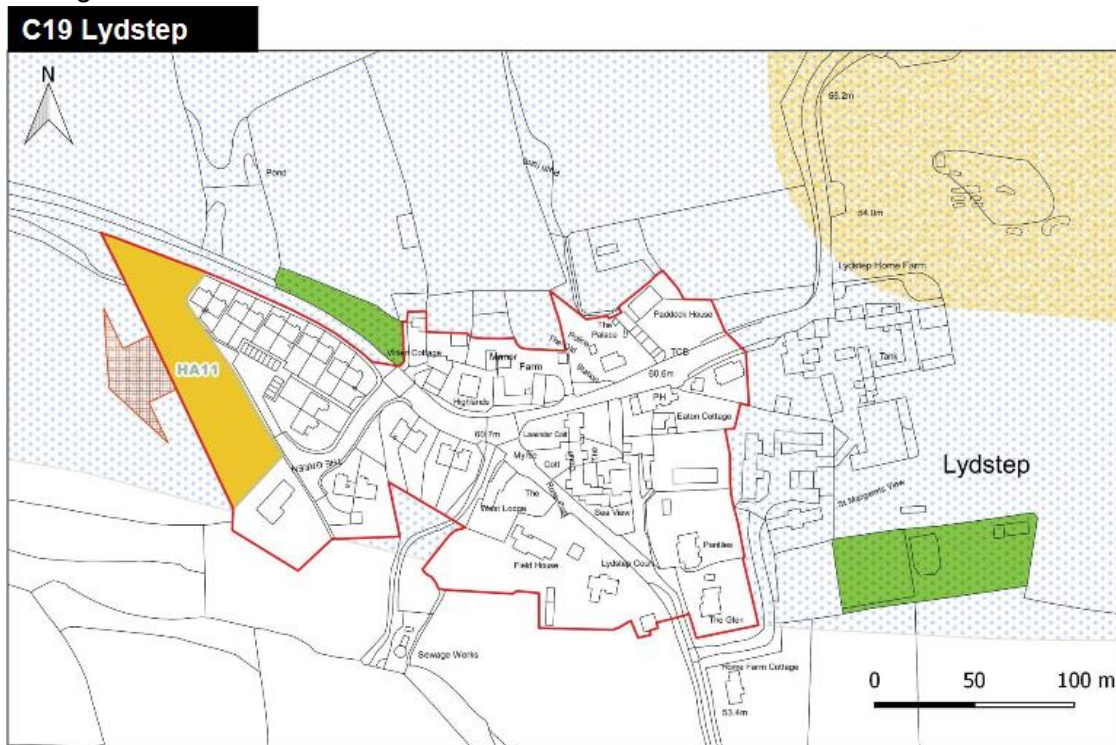
Implementing HA3 earlier in the Plan period, which is the applicants' intention, would bring forward a further 8 affordable homes.

Postponing any development of allocation HA3 removes any possibility for flexibility in the delivery of both market and affordable housing in the Newport vicinity in the period post the completion of HA1 and HA2 (circa December 2020) and the beginning of 2026 when *flexibility* is a concern to be covered as a part of evaluating the soundness of the Plan.

OTHER PROPOSED ALLOCATION IN LDP2 - LYDSTEP

It is noted that the Inset Plan C19, Lydstep, shows the residential allocation West of the Green (HA11) having an indicative arrow which points to a distinct post 2031 westward extension. In Table 7 of the Draft Replacement LDP the Requirements for this site is described as “*Land to the west of the site is highlighted for future growth, beyond 2031 on the Proposals Map*”. Lydstep is the only Inset Plan to date where such an arrow is shown.

The immediate effect of the arrow and the Requirements of page 155 of the Deposit Plan are to give confidence to the land owner that he can install appropriately sized infrastructure at this stage knowing that there will be a point where that initial outlay can be recouped at a later stage.



Current Inset Plan C19 Lydstep showing indicative arrow “Direction of Future Growth” – a unique application of this symbol

It is our view that such a formal indication of the direction of future development would be appropriate for the proposed allocation HA3 at Newport, as we consider that land immediately to the east and south of the indicated allocation is the only practical post 2031 site for the future growth of Newport – an assumption based on the following:-

- There is an existing road access from Feidr Pen y bont, although improvements would be required
- The site is unobtrusively set within the local landscape
- There is a footpath link to the A487 / town centre via the access to the Business Park.
- There are no apparent physical limitations which would question financial viability and therefore impede deliverability.

- The negative view of the NPA with regard to other Candidate Site proposals for residential development in the vicinity of Newport.

It is accepted that the “*careful considerations*” referred to in Table 7 of the Deposit Plan Policy 48 (page 153) will be incorporated into any planning application for HA3, including the strengthening of existing hedge banks, providing new landscaping and open space and with the intention of minimising the impact on the biodiversity of the area together with the need for a possible archaeological survey.

CONCLUSION

Newport is designated as a Local Centre (Policy 3) reflecting its existing wide range of services, facilities and transport links and hence the appropriateness of allocating additional residential development, including affordable housing.

HA3 is the only allocation that has not been substantially commenced prior to approval of the Replacement LDP with its end date of 2031.

It would be appropriate to include an indicative arrow identifying a probable eastern / southern extension of residential allocation HA3 as per Lydstep.

Such an arrow “*highlighted for future growth, beyond 2031 on the Proposals Map*” would give the applicants confidence to invest in the necessary infrastructure to serve allocation HA3, particularly if the suggested delayed development and phasing of development referred to earlier by the NPA, but not reflected in the Requirements of Page 153, was removed.

RECOMMENDATIONS

To strengthen the delivery of the site and the soundness of the Replacement LDP it is recommended to:

- **Include an arrow giving an indication of the direction of future growth at this Focussed Change Site at Newport, and**
- **Remove the need for proposed phasing of the indicated allocation HA3**

I look forward to the opportunity to make representations in respect of the above at the relevant upcoming Hearings.

Yours sincerely,

Martin Bell Dip T.P MRTPI (Retired)

Senior Planner

Andrew Vaughan Harries Bsc Dip TP MRTPI

Director / Principal Planner

Head of Park Direction
Pembrokeshire Coast National Park Authority
Llanion Park
Pembroke Dock
Pembrokeshire SA72 6DY



13th February 2019

The Planning Studio, Hayston Bridge
Johnston, Haverfordwest
Pembrokeshire SA62 3HJ
01437 891 817
07515 851 704
andrew@haystonplanning.co.uk
www.planningpembrokeshire.co.uk

Dear Sir / Madam

RE: LDP2 FOCUSED CHANGE
Candidate Site Ref: 88A HA3
Land North of the Business Park, Newport, Pembrokeshire



Aerial photograph of Focused Change site (Source: Google Earth 2009)

1.1 Hayston Developments & Planning Ltd has been engaged by Mr and Mrs Arwel Evans to supply additional information in respect of proposed focussed changes to LDP2 as they relate to land north of the Business Park at Newport; Reference HA3 and Candidate Site Reference 88A.

- 1.2 The LPA currently propose the following on this 0.5ha site, 15 residential properties of which 50% or 8 will be affordable and of these 15, the NPA envisages only 10 homes will be completed in the five year period 2026-2031 leaving the remaining 5 to be completed post 2031.
- 1.3 The importance of providing affordable homes within the Park at an early stage has been emphasised by the NPA, as such properties are both affordable on initial occupation and remain affordable in perpetuity. The difficulty of local people acquiring a home in the Newport area in particular, has been mentioned in the debate in 2015, reference planning application NP/15/0194/FUL north of Feidr Eglwys and that the absence of such homes was affecting the ability of employers to attract staff for local businesses.
- 1.4 At present property prices in Newport are significantly higher than average within the County and this is partially driven by the second homes market. Affordable homes are not attractive or always available to the retirement / second homes sector of the market



Candidate Site Reference 88A Feidr Pen-y-Bont, Newport showing existing field access and roadside hedge. Site slopes from south to north. Existing residential properties lie to the left

- 1.5 We have discussed the proposed timetable for the delivery of this site with Mr and Mrs Arwel Evans, who are the applicants and land owners, and understand that it is their intention to progress delivery once the LPA has adopted LDP2, by preparing a planning application for circa 15 dwellings with a suggested phasing of the development - 15 prior to 2026. The envisaged layout would include an access opportunity to land to the south, which is also in my clients' ownership, and which would allow the subsequent development of a second phase of residential development pre or post 2031. This larger area was previously submitted as a Candidate Site.

- 1.6 Staggering the initial 15 property development over a longer period as proposed by the LPA is considered to constitute a lengthy and therefore unreasonable disturbance to those who occupy the first properties in what is after all a relatively small housing site with a single access point and would cost more. Development over a shorter timescale is likely to result in lower development costs and this would be reflected in the sale price per dwelling.
- 1.7 It is proposed that a planning application is prepared for the whole Candidate Site (88A) so that the optimum layout is known for the infrastructure, road, drainage etc that will eventually serve the 15 properties and arrangements for future expansion. The layout will also indicate the proposed planting scheme (augmenting existing landscaping) that will mitigate the impact of the development within the wider landscape.
- 1.8 The anticipation of abnormal/unforeseen costs that could be generated with the development of this site is low (which forms the northern portion of an earlier and larger Candidate Site proposal Ref:- 88) which is a reflection of the gently sloping nature of the land, frontage to an existing highway with an existing access point from Feidr Pen-y-Bont and the presence of a mains water supply and a near-by sewage pumping station. The south to north-slope of the land will aid natural surface water drainage.



***View across Candidate Site 88A showing existing screening on the northern boundary.
Field slopes from south to north***

1.9 In support of my clients' desire to see early delivery of the site it should be noted that:- Newport has been categorised as a Local Centre under LDP2. LDP 2 states:-

4.30 Newport has a good range of facilities serving the town and the hinterland, and is classified as a 'district shopping centre' by Policy 54. It has a small employment park and business centre. Newport has a bus service during the week but this does not satisfy the community's evening and Sunday requirements. It is located on the National Cycle Network.

The proposed LDP2 Policy for Newport is:-

Policy 3. Newport Local Centre (TIER 3) (Strategy Policy)

Newport is designated a 'Local Centre' where the land use priorities will be:

a) to provide for and or permit housing to facilitate the delivery of the affordable housing needs of the local area (see Policy 47, Policy 48 and Policy 49). (Underlining for the purpose of these comments)

b) to permit proposals for small scale employment development to meet the needs of the local area (see Policy 44).

c) to protect and enhance the district shopping centre and community facilities which serve the town and rural hinterland and visitors (see Policy 39, Policy 53, Policy 54 and Policy 55).

d) to ensure developments permitted contribute to the protection and enhancement of the town's special qualities (see Policy 8).

e) to permit proposals that assist in delivering improved traffic management in the town (see Policy 57).

f) to assist Newport in preparing for and adapting to coastal change (see Policy 35, Policy 36, Policy 37, Policy 38).

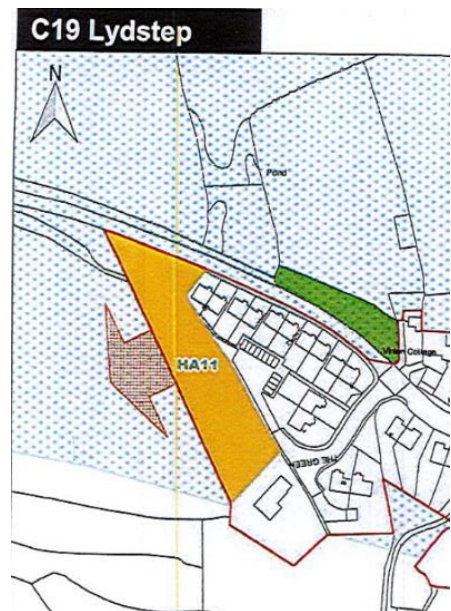
2.0 It would be a corollary to clause a) of Policy 3 for the LPA to allocate land for residential development that is capable of development in the early part of the Plan Period and to propose a layout which allows for a future phase of residential development to be undertaken as and when justified.

2.1 It is therefore considered appropriate for the Focussed Change site to show an arrow indicating the potential release of further land to the east as is the current case for the smaller settlement of Lydstep, namely HA11. ***Please see below scan of LDP2 Proposed Maps (with Newport map marked)***



C29 Newport/
Trefdraeth

Arrow



C19 Lydstep

2.2 The two other sites with proposed allocations for residential development at Newport are:-

- HA1, to the north of Feidr Eglwys, which has the benefit of a planning consent NP/15/0194/FUL for 35 homes - 14 of which would be affordable. Development of the site has recently commenced.
- HA2, the Parrog Yard and Pottery Site, where the affordable element is 66% or 8 of the 12 envisaged properties. Development of this site is nearing completion.

2.3 It is apparent from the recent starts made on these two sites that there is tangible demand for both market and affordable homes in Newport, a demand which reflects Newport's role as a significant service settlement in north Pembrokeshire.

2.4 In view of the Parrog Yard and Pottery Site likely to be completed and occupied by the time of adoption of LDP2 and the substantial development of the Feidr Eglwys site being well underway, only the Focussed Change site of 10 properties, (and then not to be occupied until the five year period 2026 – 2031), will be the only allocation under LDP2.

2.5 It is considered that with Newport providing such an important role as an employment, service and transport hub in north Pembrokeshire, that:-

- The delivery of 15 homes on this Candidate Site within the first few years of the Plan period would present a more logical and viable allocation
- Additional land should therefore be allocated for residential use under LDP2 and that land to the south of this Focussed Change site would be an appropriate allocation.

2.6 The timetable proposed by my clients comprises:-

- Adoption of LDP2 by October 2019
- Submission of a full planning application by January 2020
- Approval of the application and the associated S106 Agreement by May 2020
- Development to commence by September 2020
- Occupation of the initial properties by September 2021.

2.7 Clause 1.8 refers to the low risk anticipation of abnormal costs such as those identified with Candidate Site Proposals 88. This is never a guarantee in property development. Full understanding of all the development costs require more detailed design, plus liaison with regulatory bodies (at the time) to be able to run more accurate viability assessments. As we know, this exercise can result in the following:-

- Pressure to reduce/amend the balance of market/affordable housing to support costs and/or
- Need to increase the development site area (and hence number of dwellings), the extent of which will be subject to the total costs of the development

2.8 It is therefore concluded that the following strategy should be applied to this site:-

- That early delivery of 15 properties on Candidate Site 88A, of which 7 / 8 would be affordable, is both in the interests of my clients and that of the Policy 3 element a) of LDP2.
- That an indication should be given in LDP2 to the extension of a residential allocation east of this Candidate Site, as per the indication at the Lydstep site referred to above.

Should you require any further information please do not hesitate to contact us.

Yours sincerely,

MARTIN BELL BA MRTPI (RETIRED)
PRINCIPAL PLANNER

ANDREW VAUGHAN-HARRIES
CHARTERED TOWN PLANNER BSC (HONS) DIP TP MRTPI

