

**PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY LOCAL DEVELOPMENT
PLAN (REPLACEMENT) EXAMINATION**

**REPRESENTATION ON BEHALF OF PEMBROKESHIRE COUNTY COUNCIL AS
LANDOWNER OF THE BRYNHIR SITE, TENBY**

SITE REF. TENBY 112

HEARING SESSION 6: HOUSING PROVISION AND DISTRIBUTION

9 July 2019

1. Introduction

1.1 In response to the draft Pembrokeshire Coast National Park Local Development Plan (Replacement), this representation deals specifically with the issue of the spatial distribution of housing sites within the administrative boundaries of the National Park, along with the suitability of a particular site within Tenby, Brynhir, for residential development.

2. The Site and its Planning Background

2.1 The Brynhir site (the site) comprises some 6.35 hectares of land. It is currently an allocated housing site sitting within the development boundary of Tenby as defined by the Pembrokeshire Coast National Park Authority Local Development Plan (LDP), which was adopted in 2010. The LDP indicates that the site is capable of accommodating in the order of 168 residential units, with a requirement for 60% of the units to fall within the definition of 'affordable housing'.

2.2 The site has been a long standing housing commitment; having been included as such within this and two previous development plans.

3. The Case for Pembrokeshire County Council as Landowner

3.1 Pembrokeshire County Council (PCC) promoted Brynhir as a 'Candidate Site' in the LDP Review 'Call for Sites' exercise (Site Ref. 112).

3.2 In response to the deposit Replacement Local Development Plan, PCC also made a general objection to the lack of housing allocations identified for Tenby, which is the largest settlement with the National Park and the settlement with the greatest level of services, amenities and public transport facilities. This is because such an approach fails to accord with the sequential approach to the strategic location of housing endorsed by Planning Policy Wales.

3.3 In preparing the LDP Review, Pembrokeshire Coast National Park Authority (the Authority) decided to delete the site as a designated housing allocation and remove it from the settlement boundary (therefore removing a presumption in favour of residential development). The Authority's 'Candidate Site Assessment' summary explains the reasoning behind this decision:

"The site is allocated in the current Local Development Plan and the suitability of the site for development is established. The landowner, however, has not demonstrated a strong commitment to bringing the site forward for development to date and deliverability is uncertain. The site is considerably larger than any other allocated site in the current Local Development Plan and the number of units it can accommodate would be a significant proportion of the land supply for the National Park. The lack of security of its deliverability would undermine the strategy of the Replacement Local Development Plan."

3.4 Within the PCNPA Deposit LDP, the Authority explains that in adopting such an approach, *'the assumption is that such an action will provide the impetus to bring these sites forward'* (paragraph 4.266). It is strongly asserted that relying on the de-allocation of sites in order to accelerate their delivery is not a sound approach to strategic plan making. Nor will it assist in the delivery of an appropriate level of market and affordable housing within the plan period.

3.5 The omission of the Brynhir site, as planned, will leave the main settlement within the National Park with no identified housing allocations. This approach raises serious doubts as to whether the Plan can deliver the market and affordable housing it identifies as being key to support its communities (contrary to the Vision set out in paragraph 3.3 of the Deposit Local Development Plan). Further, it is noteworthy that the Authority has failed to achieve a 5 year housing land supply throughout the entire last plan period

and it has also failed to deliver its affordable housing target. It is strongly asserted that the omission of a significant housing allocation in the largest and most sustainable settlement within the National Park will not assist in addressing either issue.

3.6 According to the Joint Housing Land Availability Studies undertaken jointly by PCC and PCNPA (along with the Home Builders Federation, Welsh Water and several Housing Associations), the Authority achieved the following housing supply figures in recent years:

2011: 3.8 years
2012: 3.5 years
2013: 2.96 years
2014: 2.66 years
2015: 1.8 years
2016: 2.1 years
2017: 1.2 years
2018: 1.4 years

3.7 In addition, according to the Pembrokeshire Coast National Park Local Development Plan Review Report, the Authority has failed to meet its annual target affordable housing completion target in all but one year since 2007-08:

	Target	Actual
2007-08	28	7
2008-09	28	15
2009-10	28	12
2010-11	28	3
2011-12	28	0
2012-13	28	0
2013-14	28	3
2014-15	28	41

3.8 Further, the primary and secondary schools within Tenby have the capacity to absorb the additional pupil numbers likely to be generated by residential development at Brynhir.

- 3.9 The site was formally declared surplus by PCC in 2015 and thereafter, it was actively marketed for disposal. Interest from developers was reasonable, although the submitted offers were not at a level which was acceptable to the Council. Feedback from the Agent was that the offers were reflective of the requirement for a very high level of affordable housing within any scheme in order to comply with the requirements of the development plan. However, a material and significant change in circumstances has recently taken place. The site has been transferred to the Council's Housing Department and the Housing Revenue Account provides a realistic funding option. As a result, there is a real prospect of the site being developed within the immediate future, predominantly for the delivery of affordable housing.
- 3.10 This is reflected by the fact that the Council has instructed '*The Urbanists*' Planning & Design Practice to prepare an application for outline planning permission. A 'Pre-Application Consultation' exercise relating to a proposal for 145 dwellings and associated drainage, landscaping and highway infrastructure at the Brynhir site commenced on 16 May 2019, as required by the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016. The formal application for outline planning permission is scheduled to be submitted to the Authority shortly after completion of the statutory pre-application exercise, once representations have been considered and taken into account.
- 3.11 Despite obvious progress being made with regards to the preparation of an application for outline planning permission, the appointed Inspector will appreciate that there are no guarantees that such an application will be successful. If outline planning permission is not granted and the site is deleted as an allocated housing site and removed from the Development Plan settlement boundary, as planned by the Authority, the land would be largely sterilised in planning terms. As a result, the opportunity to deliver a large scale, predominantly affordable housing scheme, in a sustainable location which would meet an identified need, would be lost.
- 3.12 Further, if Brynhir was 'de-allocated', under the provisions of national planning guidance and the policies of the draft Development Plan, only a limited affordable housing scheme would be permissible on the edge of the settlement of Tenby. Such a development would have limited impact both in terms of the delivery of affordable housing and contributing to the Authority's strategic housing target in the largest settlement and most sustainable location within the National Park. Such a scheme would not have comparable positive impacts on the local economy in the short term during the

construction phase and in the longer term as future occupiers utilise local services and social infrastructure.

4. Summary & Conclusions

- 4.1 The site has been historically recognised in several development plans as appropriate for residential development and it has been formally allocated as such.
- 4.2 The site lies within the largest settlement within the National Park and it is close to a wide range of sources of employment, shops, public services and public transport nodes. It enjoys a very sustainable location.
- 4.3 The site is large and it could deliver a significant number of both market and affordable dwellings, making a positive contribution to housing delivery within the plan period.
- 4.4 De-allocating the site in order to accelerate its delivery is not a sound approach to either plan making or housing delivery. This is fraught with uncertainty and risk.
- 4.5 De-allocating the site and failing to provide no alternative deliverable sites within the National Park's main settlement will result, by definition, in more housing development in less sustainable locations. This conflicts with the sequential approach to housing delivery endorsed by Planning Policy Wales.
- 4.6 Genuine reasons exist as to why the site has not been developed previously. A material change in circumstances has occurred recently, with the site being transferred to the Council's Housing Department. As a result, an application for outline planning permission is currently being prepared and a 'Pre-Application Consultation' exercise is underway. This demonstrates a real commitment to the site being developed in the immediate term.
- 4.7 Notwithstanding the above, there is no certainty that outline planning permission will be secured within the existing plan period. If it is not, and the site is de-allocated and removed from the settlement boundary of Tenby, then a presumption against large scale residential development on the site will exist, leading to its sterilisation in planning terms.
- 4.8 For the above reasons, it is strongly asserted that the site should remain as an allocated housing site within the settlement of Tenby. Whilst there can be no absolute guarantee that any allocated housing site will be developed within

a plan period, the change in circumstances outlined above indicates that there is a very realistic prospect of the site being developed for housing within the immediate future.

4.9 The development of the site would make a positive contribution to the supply of housing within the National Park. It would also make a significant contribution to the delivery of affordable housing for an Authority which has failed to meet its target. It would have a positive impact on the local economy both in the short term during the construction phase and also in the longer term as future occupiers utilise local services.

4.10 In light of the above factors, the appointed Inspector is respectfully invited to recommend that the site be retained as an allocated housing site.

David Fitzsimon

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