

REPORT OF THE HEAD OF PARK DIRECTION

**SUBJECT: SUPPLEMENTARY PLANNING GUIDANCE DOCUMENT:
AFFORDABLE HOUSING (REPLACEMENT GUIDANCE)**

Purpose of the report

1. To advise Members of the responses received on the above public consultation and to recommend to Members to adopt the guidance documents for development management purposes. The guidance replaces the existing guidance adopted on the 30th March 2011. This guidance has been effective for development management purposes from July 1st 2014 as an interim measure to assist in the delivery of affordable housing.

Background

2. The background to this revised supplementary planning guidance is an appreciation of the importance of, and need for, affordable housing in the National Park, together with a recognition that recent delivery rates have fallen substantially below what is required.
3. Work has been undertaken by consultants on behalf of the Authority, with the help of key stakeholders (Pembrokeshire County Council, Pembrokeshire Housing and Cantref Housing Associations), to provide guidance on the way in which the local planning process might be enhanced so that an increased supply of affordable housing can be achieved.
4. The Authority's 2011 Supplementary Planning Guidance is being replaced with guidance that provides:
 - for a greater return for the developer with the type of affordable housing that can be built on site.
 - an up to date appraisal of how much affordable housing can be delivered on sites and through contributions in the current economic climate. Generally this points to less affordable housing being capable of being delivered.
 - for a more streamlined application process.
5. A workshop was held with key stakeholders¹ on January 16th 2014 to discuss key factors in the delivery of affordable housing and opportunities to increase affordable housing supply. A workshop was also held with Members and the consultants engaged for the project on the 30th April and Members input was

¹ Attendees included landowners, agents, housing associations and the County Council

reflected in the guidance and supporting project report that were published for consultation.

6. The new and updated guidance was approved for public consultation by the National Park Authority on 11th June 2014. The 12 week consultation began in July 2014 and closed on Friday 26th September 2014. Late representations are also included.
7. 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. St Davids City Council also devoted their recent meeting to discussing the document. Pembrokeshire County Council, Pembrokeshire Housing Association and I on behalf the Authority attended.
8. Letters and CD 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 in this format. Paper copies of the documents were available to view at the National Park Authority Offices in Llanion Park, Pembroke Dock.
9. The consultation was advertised via the Authority's web site and via public notices in the Western Telegraph which appeared on 2 July 2014. A press release was also distributed to local and national media outlets. Towards the end of the consultation we distributed a second press release reminding the public of the upcoming deadline for submissions. This appeared in the Tenby Observer, Friday 19th September 2014, the Tivyside Advertiser, Tuesday October 16th 2014 and the County Echo Friday, 19th September 2014. In addition to this, 1695 individuals saw the 'post' the Authority made regarding the consultation via Facebook or Twitter.

Report of Consultations

10. A total of 12 people/organisations responded to this consultation. Officers have also received informal comments which are addressed in this covering report. I have also discussed the draft Officer responses with the Affordable Housing Working Group for Pembrokeshire at its meeting on the 23rd October 2014. Officer responses are shown in Appendix 1 to this report. These changes are shown in Appendix 2 to this report (amended extracts from the Guidance).
11. The changes proposed are:
 - a. **Types of affordable housing:** Clarification of the types of affordable housing provided at paragraph 2.10
 - b. **Rounding up and down:** Clarification regarding 'rounding up' and 'rounding down' at paragraph 4.2.7

- c. **Site Allocations:** Appendix 5 of the guidance published for consultation, showed the results of updated viability assessments for the Local Development Plan site allocations and provided a RAG (Red-Amber-Green) colour score to indicate whether or not a site is viable at a given percentage provision of affordable housing and Acceptable Cost Guidance rate (ACG).

It is proposed to replace this table with one that shows more clearly the changes the Authority has made. The table now provides a comparison between the affordable housing percentages for housing and mixed use site allocations set out in the Local Development Plan under Policy 42 and Policy 45 and those percentage provisions found to be viable after new viability assessments were carried out to inform the new guidance. Appendix 1 of the guidance would be deleted as it is no longer required.

The expectations set out in the table have also been reviewed to consider the viability of proposals at 5% intervals rather than just 10% intervals; to include the cost of incorporating sprinkler systems and to increase the developer profit from 17% to 20%. This takes account of the way in which Inspectors currently look at Local Development Plan viability in Examination.

- d. **Sites not allocated in the Plan and single dwelling proposals:** Appendix 5 could also be usefully updated to include changes we have made for sites (those not already allocated in the plan) and single dwelling applications. The guidance introduces a more flexible regional approach to the application of Policy 45 (Affordable Housing) of the Local Development Plan by varying the percentage or financial affordable housing contributions regionally.

Conclusion

12. Subject to approval by Members, this guidance, subject to the amendments proposed, will be adopted and used in conjunction with the Pembrokeshire Coast National Park Local Development Plan Adopted September 2010 when considering planning applications within the National Park. All those who provided comment will be notified of the outcome.

RECOMMENDATION

- 1. That the Officer Responses set out in Appendix 1 be agreed as the National Park Authority response to this consultation;**
- 2. That the Affordable Housing Supplementary Planning Guidance as amended in Appendix 2 be approved as supplementary planning guidance to the Pembrokeshire Coast National Park Local Development Plan and be adopted for development management purposes.**

Background papers:

[Local Development Plans Wales, Policy on Preparation of LDPs, December 2005.](#)

[Pembrokeshire Coast National Park Local Development Plan, September 2010](#)

[Project Report Affordable Housing Delivery April 2014](#)

[Pembrokeshire Coast National Park - Committee Papers](#) (Report prior to consultation)

Planning Policy Wales (Edition 7, July 2014):

<http://wales.gov.uk/topics/planning/policy/ppw/?jsessionid=959D17CBE44B4C21C123285AA5AE6E99?lang=en>

Technical Advice Note No. 2 June 2006

[Welsh Government | Technical Advice Note \(TAN\) 2: Planning And Affordable Housing \(2006\)](#)

Local Development Plan (Adopted 2010)

<http://www.pembrokeshirecoast.org.uk/default.asp?PID=178>

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

Authors: Martina Dunne (Park Direction)

Consultees: Jane Gibson, Director of Park Direction and Planning; Tegryn Jones, Chief Executive, Affordable Housing Working Group Pembrokeshire

Pembrokeshire Coast National Park Authority – Replacement Affordable Housing Supplementary Planning Guidance Comments received and Officer Response

AH/1037 Mr Frank Booth - Serendipity Holdings Ltd:

1. I appreciate the Supplementary Planning Guidance is an improvement on the previous policy but it is still not going far enough and should be further reduced. My understanding is that only 21 houses of the 290 dwellings built in the last 5 years have been affordable homes and is nowhere near the target of 35-45.
2. Would you give this matter further consideration?
3. Over the past 5 years, we have built 21 apartments in the site formerly known as The Guildhall in Tenby, and we would be happy to continue investment in the National Parks area if the affordable housing could be reconsidered.

Officer Response

4. The proposal referred to in the response contains no affordable housing based on a high threshold used in the old Local Plan adopted in 1999. It is difficult to ascertain whether what is envisaged here as an outcome is to have no affordable housing provision.
5. Officers have continued to discuss with landowners and agents to bring sites forward since July 2014 using the new supplementary planning guidance. I am not aware of any approaches made to the Authority directly by Serendipity Holdings in a number of years to discuss a proposal or to show how the current approach impedes viability.
6. Without evidence to substantiate further change then the Authority can only once again invite the landowner to submit proposals for consideration and testing of viability if that is the issue.

AH/4298 D J Beynon

7. Affordable housing feedback
8. The recent changes to the AH policy are to be welcomed as a step in the right direction but are still wholly unrealistic.
9. Developers are stuck between a rock and a hard place because they have to invest a lot of money into a scheme with the added problem of having to build social housing that the local authorities are unable to build themselves.

10. The policy has led to many single and multiple plots being left undeveloped because the builder, developer cannot afford to build the AH.
11. Developers are the only businesses that have to supply AH. Walking down the street I can see many businesses such as the butchers, bakers, newsagents etc. none of which contribute to AH! If the community benefit from AH then surely the community should pay for AH through the council tax contributions.
12. Can it not be considered that if I build a 4 bed house that I move into and sell my 3 bed house to someone who sells their 2 bed etc then the AH is being released at the bottom of the housing stock when the first time buyer 1 bed flat comes on to the market.
13. Also, as a developer I have been forced to build less units on my development site because if I built more, then I would have to contribute more. This in turn means that plots are underdeveloped and leads to less housing stock which in turn pushes up the values of the current stock due to supply being held artificially low. This is the exact opposite to what the policy aims to achieve!
14. Also, the AH levy is agreed in advance and is based on projected figures that for any number of reasons could be wrong. Units of AH have to be supplied/contributions paid irrespective of profit or loss the developer might make. Surely it would be fairer if it would be in the form of tax on profit at the end of the development.
15. Development sites released by the local authority over the last few years have been sold for incredibly low sums because of the AH policy (Cottage hospital in Tenby as one example) perhaps if the policy were scrapped then land in public ownership could be sold for more, and more funds would then be available for the Authority to contract out the building of AH to their chosen specs.
16. It would also appear that if I were to develop just a few miles down the road in the PCC domain then I would be looking at a considerably lower contribution.
17. Make the whole community pay for AH service just like any other service in the county through the council tax. Why should developers have to do the job of PCC?

Officer Response

18. The principle of private housing development cross subsidising the delivery of affordable housing is Welsh Government policy. It does not ask commercial businesses to do so.

19. The issue here rests on viability and the guidance has been tested by independent consultants to produce reduced percentages requirements. In addition there is always the opportunity to negotiate viability on individual proposals.
20. Community Councils do not have the funding of the scale required to respond to affordable housing need and neither does the County Council in terms of social housing grant provided. A substantive Welsh Government building programme for affordable housing provision would assist greatly but this is unlikely in the current climate. In the meantime the Welsh Government expects private market housing to cross subsidise.
21. Housing of various types helps to deal with both demand and need. For housing to be regarded as affordable housing in planning terms then there needs to be controls on pricing and occupancy.
22. The location of the site referred to is not provided. Without more detail it is difficult to comment further. Normally through the development management process this Authority would seek to maximise the use of land both in terms of making the best use of land in Centres and ensuring that the provision of affordable housing is also maximised. This therefore is not an approach that this Authority would in principle be supportive of.
23. In terms of timing time lags can work to the benefit or detriment of the developer. The planning process does allow for renegotiation by the developer when circumstances change.
24. The sale of Council land would be subject to the Council itself deciding what its priorities are for use of the money. The money received for the sale has not to my knowledge been used for affordable housing delivery. In terms of planning this Authority has to treat landowners equitably and hence the requirement for affordable housing applies equally to the County Council. The Authority also has difficulties in so far as there are limited opportunities to build affordable housing in Tenby so a policy of selling land to contribute to a fund for affordable housing would not mean that affordable housing could then be delivered as there would be no land left to build on.
25. Depending on the location in Pembrokeshire affordable housing requirements can vary. No specifics are provided to comment further.

AH/3782 Mr P Howells, Farm Policy Adviser – NFU Cymru

26. NFU Cymru welcomes the opportunity to respond to the Pembrokeshire Coast National Park Authority (PCNPA) Consultation on Affordable Housing Supplementary Planning Guidance (SPG) on Policy 45 of the Local Development Plan.

27. The Authority states as a duty the need to foster the social and economic well-being of local communities and one of its objectives is to promote and support sustainable agriculture. In pursuit of these goals, NFU Cymru has long called for a planning system that demonstrates a thorough understanding and appreciation of the role of agriculture and for an appropriate balance to be struck between the weight attached to the protection of the landscape and community and business development within the National Park. It would be remiss of NFU Cymru at this stage not to take the opportunity to remind the Authority, that generations of farmers have shaped the landscape and the environment of the Pembrokeshire Coast National Park area long before the National Park was designated and the establishment of the Authority.
28. We therefore wish to express our concerns with these proposals which are likely to have a detrimental impact on development in rural areas within the PCNPA.
29. We believe the proposals will place our members within the National Park Authority at a disadvantage to their counterparts who reside outside of the PCNPA boundary, yet these people are the custodians of the Park, whom the National Park Authority should be representing and supporting to develop sustainable farms. Where housing development occurs, on-site provision of Affordable Housing is possible. However, where the net gain of a single dwelling is proposed, there will be no option other than to pay the commuted sum. We have very real concerns that this will make the costs of development of single dwellings completely unviable and consequently prevents sustainable housing development within the National Park area.
30. We are also concerned that proposals will see developers required to enter into Planning Obligations with the NPA, with the Local Authorities seeking contributions from development in the form of the Community Infrastructure Levy (CIL). Affordable Housing Contributions through commuted sum(s) represents a further expense that is likely to result in the costs of development being prohibitive within the Park boundaries.
31. There also remains a lack of clarity as to how the funding will be managed. We would question where the money will be spent? How does the Authority plan to work to ensure that it makes best use of the commuted funds? Furthermore, what assessment has the National Park Authority undertaken with respect to potential income from commuted funds versus the affordable housing need within the National Park? We would also question how the £250 per square metre figure has been reached and what formula has been used? Furthermore, as this is such a complex subject area, we do not believe that the repercussions of implementing this policy is understood by those who may wish to proceed with developments in the future and its inception could undoubtedly deter developers from starting projects within the PCNPA area. It is our view that the Park Authority should be supporting those communities who live within the Park and not penalising them.

32. NFU Cymru is of the view that the policy is absolutely unreasonable and at the very least, any development resulting in the net increase of a single dwelling should be considered on a case by case basis. It is our view that agricultural dwellings should be exempt from the Affordable Housing Contributions process.
33. NFU Cymru is disappointed that the Guidance makes no reference to rural buildings which are so integral to the vista of the National Park. The viability of projects to develop such buildings is marginal; we would highlight that the alternative to appropriate development of these buildings is to let them fall down completely, which in itself constitutes as permanent change to the landscape the NPA is so keen to preserve.
34. We are aware of barn conversion applications within National Park authority areas in Wales which have been granted on the basis of providing habitat for bats, owls etc and this would appear to us a sensible compromise. Allowing these potential dwellings to fall down, as a result of implementing these costly CIL/Section 106 charges, would cause more harm to the surrounding habitat and could cause significant loss of biodiversity within the PCNPA, not to mention the unsightly scene of a crumbling structure in the landscape that will result.
35. NFU Cymru members have raised concern that barn conversions are already extremely costly to complete due to the remote positioning of the building. The costs involved in getting basic amenities to the site, i.e. electric, water, phone line etc already challenges whether or not the project is viable. The CIL/Section 106 charges as outlined in the document would undoubtedly make these types of projects unaffordable.
36. NFU Cymru strongly believes that there should be scope within the Policy for local people to make their case. We would highlight the pre-application process is well received and we do recommend the service to members. Given the proposals we feel that this should be a free of charge service in order that they can make a judgement on whether or not a project is viable.
37. We will re-iterate that it is the variation in performance/lack of consistent approach to planning within and outside the National Park Authorities that leads to there being no clear consensus as to whether they should continue to have responsibility for planning in their respective areas. There is a real risk that the introduction of these measures will serve to confirm to Welsh Government that PCNPA Development Control is unfit for purpose going forward.
38. Overall, NFU Cymru believes that the SPG will have a long term impact on development within the National Park boundaries. It is vital that this is subject to annual review and that the draft SPG is amended so that it is robust enough to facilitate any changes that are needed. The charges

associated with such development in the countryside should be made available and clear guidance offered at the pre-application stage so that applicants are informed from the outset if their project is viable.

39. We would urge the National Park Authority to carefully consider the proposals again and give further reflection on the implications the proposals within this document will have on future developments within the NPA.

Officer Response

40. Affordable housing contributions are applicable both inside and outside the National Park. Percentage requirements vary throughout Pembrokeshire depending on the location. Again viability continues to be considered on individual proposals and individuals can negotiate regarding the appropriateness of the affordable housing contribution.
41. The current approach to planning obligations in the Authority's supplementary planning guidance is one based on joint work undertaken with the County Council. It applies to proposals for three or more dwellings rather than single dwellings or the conversion of individual barns. Viability issues are considered with affordable housing contributions. The Authority is not currently pursuing the route of preparing a schedule for a Community Infrastructure Levy. It would look to work with neighbouring planning authorities should this become a priority. Again this would have to be tested for soundness in terms of viability at Examination stage by an Inspector.
42. The funding received from the affordable housing contribution is held by Pembrokeshire County Council for the delivery of affordable housing. The Council's Monitoring Officer Eirian Forrest can provide the respondent with a schedule of monies received and spent in Pembrokeshire. Where it will be spent is set out in the guidance at Appendix 2 to the guidance.
43. There is a substantive need for affordable housing in Pembrokeshire and the contributions were only ever likely to make a small contribution to affordable housing provision in the National Park. Usually the sums assist with bringing a housing association development forward which required additional funding to make it a viable project. Small amounts but invaluable to the housing association.
44. The calculation of the affordable housing contribution is founded on providing a proportionate requirement on single dwelling proposals to that required on larger sites. The requirement of £250 per square metre varies depending on the location in the National Park. A similar approach is taken in Pembrokeshire's planning jurisdiction.
45. The principle of private housing development cross subsidising the delivery of affordable housing is Welsh Government planning policy that

the Authority is required to implement. Providing affordable housing is fundamental to a community's sustainability.

46. The negotiation of affordable housing as part of a scheme has been government policy in Wales for some time. There nevertheless comes new issues to address with individual projects coming forward or external changes that impact on how policies are applied. The Authority has sought to highlight our willingness to discuss and negotiate through our free pre-application service. This has continued since the approval of the current guidance as an interim measure for development management purposes.
47. The Authority is required by Planning Policy Wales to address a community's need for affordable housing. Technical Advice Note 2 provides technical guidance on setting targets based on need and setting out how the target will be achieved using different approaches. These thresholds and requirements are tested through Examination and monitored. The viability of each proposal is considered.
48. Agricultural dwellings are exempt from providing an affordable housing contribution – see paragraph 4.1.6iii of the guidance.
49. Planning obligations for community facilities are only considered on developments of 3 or more dwellings. Viability concerns for barn conversions are considered by the Authority.
50. The issue regarding the future of planning authorities in Wales is not a matter that this guidance can address. Just one comment though: the question of consistency is an interesting one and following it to its logical conclusion it would seem there would be one planning authority for Wales where policies, procedures and performance would be standard throughout the Principality. In terms of this planning authority's performance as measured by Welsh Government standards this Authority is performing well.
51. Monitoring is an annual requirement of planning authorities. The Authority will also be carrying out its first formal review of the Local Development Plan next year. There is also a monitoring mechanism built into the Supplementary Planning Guidance at Chapter 6 of the guidance.
52. The final comments regarding clarity of presentation for the requirements and contributions does need to be addressed in the final published document. The website page for planning and affordable housing has already had a complete revamp but can be checked again for clarity with the final publication. See changes proposed in Appendix 2. An offer to meet the Officer in question to explain our approach and address any misunderstandings would also assist.

AH/2660 The Chartered Institution of Waste Management

53. We have received your invitation to comment on the above guidance as part of your consultation process.
54. CIWM Cymru Wales would like to be in a position to respond to this and all similar documents, however we do not normally comment on these, as the plans cover all aspects of landuse planning. There may be occasions when we will respond when the policies being changed refer to waste.
55. Unfortunately in this instance we are not able to respond.
56. Please continue to send similar documents to CIWM Cymru Wales, these are of interest to members and will be logged accordingly.

Officer Response

57. Comment noted.

58. AH/4297 Ms Catherine J Nicholas

59. I have just had the opportunity to briefly read the above mentioned document. As a single parent I find myself looking at properties on the market knowing I will be unable to afford anything that is currently available. I am renting a property at the moment but my long term plan is to obtain a place of my own. While the SPG report does look promising I note there are very few areas within Pembrokeshire Coast National Park that are currently available under the LDP proposals. I rely on the help of my parents, as do many families, and they live within the Pembrokeshire Coast National Park. Unfortunately there seems to be nothing available in my locality. Even though LDP proposals and the SPG report list these sites when are they going to be developed?
60. On another tangent if I were to obtain a plot of land and wished to develop it, the costs of planning applications, architects fees etc is quite an eye opener. However what saddens me is the lack of plain Welsh/English that comes with these applications. What exactly in laymen's terms does Pembrokeshire Coast National Park want from the proposed developer? Especially families where their parents or other members of the family may have land available for first time or low cost affordable housing!

Officer Response

61. There are no specific site details or proposal details to accompany this representation so I can only comment in general terms. There are opportunities with the land highlighted for development in the Plan but

there are also unforeseen site opportunities that are not identified. The best way forward if there is a firmer proposal in mind is to make use of our free pre-application service for further advice.

AH/3664 Mr Michael Argent – Argent Architects

62. I list below (and provide images on the next 2 pages by way of emphasis attached as Appendix 3 to this report) some of our projects which are dead in the water due to the policy.

63. All are interesting and worthwhile contributions to the local economy and social fabric. Some projects are in towns such as Tenby, but others are on obvious infill sites in villages where clients wish to combine living with IT based working, and require purpose built premises:

- a) Cottage Hospital Site, Tenby. 9 houses
- b) Ocean Commotion chapel Tenby 4 flats
- c) Croft Court. 6 penthouse flats
- d) Taskers Garden, West Williamston (private house for local couple wishing to work from home)

64. Sensitive small scale development is essential for economic and social vitality. Builders and craftsmen are scratching for work – our phone rings almost daily regarding these projects – and others that don't get even get as far as sketch proposals. The policy is not delivering and though well intentioned, is draining life blood from the area and has brought a vital part of the local economy (new build and the network that supplies it) almost to a standstill. Only the very rich can afford to build a new house. Builders are giving up and skills are being lost. I can't emphasise strongly enough the urgency for revision. And not just revision of percentages - it is too onerous and time consuming for developers to have to prove viability. I'm sure you are aware that the realisation of any building project is fragile - requiring huge effort, coordination and enthusiasm which can so easily unravel due to planning delay.

65. We are a small practice but every architect I know is experiencing the same thing. This HAS to be a major drag on the local economy as indeed on the whole of Wales.

Officer Response

66. There may be a misunderstanding here of the planning system and in particular affordable housing policy. Officers of the Authority spend considerable time seeking to overcome misunderstandings as to how the Local Development Plan affordable housing policy is applied and its inherent flexibility linked to Development Appraisal Toolkit.

67. The PCNPA affordable housing policy cannot 'stall' development given the requirement to provide for a reasonable amount to be paid to the

landowner for the land, and for developers and contractors to make a profit. However it does require contact and dialogue. This means that proposals require viability testing.

68. In terms of the specific proposals referenced in the letter an update is provided below for each.

69. Where affordable housing was a relevant issue to be addressed only figures for Tenby Cottage Hospital site which is being progressed by the landowner have been submitted for viability testing. In terms of those proposals that the agent is still acting on behalf of he needs to come forward and enter the discussion on viability.

Proposal	Most relevant Local Development Plan Policy/ies	Planning Status – last correspondence
Cottage Hospital Site, Tenby	Allocated for 10 residential units 6 to be affordable dwellings. Design policy	Pre application 25 th July 2013: Issues raised previously in April and June 2013 with the layout proposed have not been addressed. Officers advised in April 2013 that once a layout and number of dwellings had been agreed then we could commence discussion as to on-site affordable housing. August/September 2014: Contact made by the landowner and detailed negotiations regarding viability are underway.
Ocean Commotion chapel Tenby	Policy on protecting employment sites applies and potentially the Authority's affordable housing applies. Design policy	Pre application 28 th November 2013: Issues regarding the loss of an employment site need to be addressed. Once addressed then an affordable housing provision needs to be addressed. Lack of detail provided in terms of the development impact on the area.
Squibbs Studio, Tenby	The Authority's Policy on Affordable Housing Policy 50 Town Centre uses	Pre-application advice completed and sent- 13 th March 2013: Conversion to residential acceptable in principle with a single affordable unit required. NP/14/337 11 th August 2014 Permission for retail and guest accommodation approved. Application progressed by a different agent.

Proposal	Most relevant Local Development Plan Policy/ies	Planning Status – last correspondence
Croft Court	Design/Amenity policy Affordable housing policy	Last pre-application advice completed on the 15 th April 2013: Issues to address the impact of the scheme on the wider area. More information required. If acceptable in principle then affordable housing issue would need to be addressed.
West Williamston	Policy on development in the countryside.	Appeal dismissed on the 13 th of May 2013: Issue addressed by the Inspector was whether the development would be sustainable in terms of location. NP/14/558: Recent submission by a different agent for a new dwelling.

70. One of the outcomes of our Scrutiny Review Committee into affordable housing was to host a workshop to provide advice and guidance to agents and others on the Authority's policy and on using the Development Appraisal Toolkit. This took place on the 16th January 2014 at our offices. Argent Architects was represented. The hope was that this would go some way towards an increased understanding of the planning process and the delivery of affordable housing.

71. There are sites throughout the National Park which have permission but have not started; sites which have been started but with no recent activity and sites currently under construction. These sites which are in various stages of development are sites both with and without an element of affordable housing.

AH/3950 Transport Division – WG

72. I refer to your consultation letter dated 16 June 2014, and would advise that the Welsh Government (Transport) as highway authority for the motorway and trunk roads have no comments or observations on this document as it does not directly impact on the trunk road network.

Officer Response

73. Noted

AH/4118 Mr P J Booth – Anglodefine Ltd

74. As the Director of a local development company I would like to comment on the Pembrokeshire Coast National Park Authority's Affordable Housing Supplementary Planning Guidance which came effective on 1 July 2014.
75. Whilst I appreciate that this is an improvement on the previous SPG I don't think it has gone far enough to kick start off development within the PCNP area.
76. I consider the percentage to be still too high and should be further reduced or a better option that should be considered is to release land for development outside the areas that have been identified for development in the current LDP.
77. This could be agricultural land that would be purchased at just above agricultural land value thereby enabling private developers and housing associations to build dwellings at affordable costs as the land price would be substantially lower.
78. It is clear from the figures shown in para 2.3 (Housing Need) that the policy is not working as only 21 of the 289 dwellings built within PCNP area between 2007 and 2013 were affordable homes and does not come anywhere near the ambitious target of 35 affordable dwellings per annum!
79. I appreciate that the framework for these policies are generated by the Welsh Assembly Government, perhaps it is time for them to realise that land identified for residential development within the Pembrokeshire Coast National Park is always going to be more expensive than in outlining areas and affordable housing within the PCNP should not be a consideration. We all like the best, but unfortunately we cannot always afford it and have to settle for second best.

Officer Response

80. Without evidence to substantiate further change then the Authority can only once again invite the landowner to submit proposals for consideration and testing of viability if that is the issue.
81. Exceptional land releases can already be considered, i.e. outside the areas identified for development in the Local Development Plan. Exceptional land releases tend to be difficult and time consuming to bring forward but can provide a valuable contribution to affordable housing delivery. They are normally small in nature and could not be released on a scale that would satisfy need. Welsh Government policy asks that planning authorities secure affordable through a variety of means including from cross subsidies from private market dwellings.

82. The poor completion figures provided a context for the change in approach set out in the current guidance. Requirements have been lowered based on the evidence provided by independent consultants.

83. Unless there is a radical change in the approach that Welsh Government take in terms of how they expect affordable housing to be delivered then this remains the approach that this Authority must adopt.

AH/4217 Mr Graham Fry, Royal Lion Hotel

84. On the issues of affordable housing - just a few bullet points for discussion.

- Use system such as Jersey. A local market and an open market designating properties in the correct category.
- Use land owned by Pembrokeshire County Council giving planning consent for starter homes
 1. Lease plot with option to buy
 2. Part sell plot $\frac{1}{4}$ $\frac{1}{2}$ $\frac{3}{4}$ with option to buy
 3. Self-build designed for one bedroom with the option of adding a second and third bedroom and a garage

85. We must bring these costs into affordable mortgages.

Officer Response

86. This system in Jersey would require primary legislation to operate in this National Park and is beyond the scope of this guidance.

87. Jersey has very strict housing laws which specify who can rent or buy property and more specifically who can live in it.

88. A small number of people each year who are considered to be of social and/or economic benefit to the island are granted consent to purchase dwelling accommodation. The properties which they can buy are usually outside the price range of the local purchasers. Application is normally made through the client's accountant to the Housing Minister.

89. Some people are granted Licenced status (essential employee) and can buy, sell, or lease any property in their own name as long as they keep their licenced status. These people fill jobs for which there are insufficient locally qualified applicants, eg doctors, dentists, accountants, bankers, teachers, nurses and some other professions. Although there are exceptions, most of these permits are for a short term contract of three or five years.

90. Most people who come to work in Jersey can only live in registered accommodation. Lodging Houses and lodging in private homes come under this heading and most people will live in either of these. Lodging House accommodation is normally for one to four persons per unit.

Lodgers have no security of tenure. Some employers will provide accommodation for their employees, particularly in the tourism and agricultural industries. For these people, consent to purchase or lease accommodation will be granted after they have lived in the island continuously for a period of 10 years.

91. Land in the ownership of Pembrokeshire County Council is allocated for housing in the Plan. A site has come forward at Crymych but there are land allocations at Broad Haven, Solva, and Tenby that could be usefully brought forward. They all include the provision of affordable housing. The operation of any scheme on the site as suggested would be for the Council to consider.

AH/3617 The Coal Authority

92. Thank you for consulting The Coal Authority on the above document.
93. Having reviewed the document, I confirm that we have no specific comments to make at this stage.
94. Should you require any assistance please contact a member of Planning and Local Authority Liaison at The Coal Authority on our direct line (01623 637 119).

Officer Response

Noted.

AH/2662 Network Rail

95. I refer to your letter dated 16th June 2014 with regard to consultation undertaken on the proposed replacement Affordable Housing SPG.
96. Network Rail do not have any comments to make on the replacement SPG.
97. Any future affordable housing development proposals which may affect Network Rail-owned land and railway infrastructure will be subject to statutory consultation with Network Rail through the planning application process.

Officer Response

98. Noted.

AH/2910 St Davids City Council

99. I have pleasure in confirming the following comments made by St Davids City Council in response to the Replacement Affordable Housing Supplementary Planning Guide:

- a) Generally there is continued concern with the lack of housing, including affordable housing, being built within our City Council boundary and the wider peninsula area. Para 2.3 indicates on average 3 affordable units per year are being built in the National Park Authority area as a whole, this is clearly unacceptable and is strangling the sustainability of our local community.
 - b) The City Council welcomes the revised approach to housing provision, and the revised viability figures. They would hope that a 30% target figure on sites within the St Davids area will now help stimulate the general market and allow a proportion of each site to consequently deliver affordable housing. They further welcome the 'positive approach to viability negotiations' as some of the sites may have other constraints that will need addressing in order to deliver housing. The Council would not want these sites being prevented from coming forward due to over onerous restrictions.
 - c) The Council welcomes the revised financial contribution of £150 per square meter towards affordable housing provision in the St Davids area. They look forward to the money already generated through S.106, and that which will be generated in the future, contributing to the delivery of affordable houses in the local area.
 - d) The Council welcomes the flexible approach to tenure and accommodation mix, this is important to tailor housing to the area and allow them to be sustainable in perpetuity.
 - e) The City Council welcomes the close working relationship that exists between the National Park Authority, County Council and local Housing Associations. Hopefully by all working together we can successfully deliver additional affordable houses in the St Davids areas, allowing local families to remain in the community and ensure its sustainability.
 - f) Additionally to the SPG, the City Council continues to be very concerned about the reduction of the permanent population in St Davids. It is disappointing that the Welsh Government and other national housing stakeholders including PCNPA seem unable to offer any protection to communities where the proportion of existing housing transferring to holiday tenancies increases every year.
100. Finally on behalf of the Mayor and City Council, I would like to thank you for taking the time to attend the recent Council meeting and for providing a clear summary of the issues and implications that have given rise to the revised guidelines.

Officer Response

101. The comments are noted and welcomed. Officers from Pembrokeshire Housing, Pembrokeshire County Council and this Authority had a very useful discussion with the City Council regarding affordable housing generally and the revised approach the Authority is taking.

102. With regard to the final comment regarding second homes I have had discussions with the Mayor separately regarding how the Authority does not have control over the buying and selling of dwellings that are on the open market. Whilst our sympathies lie with the community this is an issue that can only be addressed by Welsh Government.



Nathaniel Lichfield
& Partners
Planning. Design. Economics.



**Affordable Housing: Supplementary
Planning Guidance**

Pembrokeshire Coast National Park
Authority

[April Amendments for NPA November
2014](#)
[31079/JCO/LM](#)

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- Appendix 1 Affordable Housing Requirements on Allocated Sites
- Appendix 2 Use of S106 Contributions in Local Area
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1.0 Introduction

What is this Document?

1.1 This Supplementary Planning Guidance (SPG) is one of a series of SPG documents which provide detailed information on how policies contained in the Pembrokeshire Coast National Park Local Development Plan (LDP) will be applied in practice by the National Park Authority.

1.2 Throughout this document Pembrokeshire Coast National Park Authority will be referred to as the 'National Park Authority' and Pembrokeshire County Council will be referred to as the 'County Council'.

1.3 In accordance with TAN 2, this SPG provides detailed guidance on the issue of affordable housing. This is one of a range of community benefits that may be sought by the National Park Authority. Others might relate to open space, transport and education and are considered by a Planning Obligations SPG which was adopted in June 2011.

1.4 Technical Advice Note 2 (Planning and Affordable Housing) states that SPGs have an important role in providing policy guidance in conjunction with Planning Policy Wales (PPW) and the relevant LDP. Para 6.2 states:

“SPG can provide detailed information for developers, landowners, RSLs and the public on how the Local Authority’s planning policy on affordable housing will be delivered in practice.”

1.5 With regard to securing affordable housing, Para 12.2 of TAN 2 states:

“Development plans and/or Supplementary Planning Guidance (SPG) should set out the circumstances where local planning authorities will use planning conditions or planning obligations to ensure that the affordable housing provided is occupied in perpetuity by people falling within particular categories of need”

What are its Objectives?

1.6 The objectives of this SPG are to:

- 1 Enable developers and landowners to understand the National Park Authority’s requirements in relation to affordable housing;
- 2 Provide clear guidance on how the policies contained within the Pembrokeshire Coast National Park Authority LDP will be implemented by the National Park Authority; and,
- 3 Ensure a consistent approach to the interpretation of the LDP by the National Park Authority.

What is its Status?

1.7 This SPG has been informed by consultation with a number of key stakeholders. It will be the subject of public consultation. In the interim, in the interests of improving delivery of affordable housing, the guidance will be effective for development management purposes from the 1st July 2014. All applications validated from Tuesday 1st July 2014 will be considered against the policies of the Local Development Plan in conjunction with this supplementary planning guidance.¹

- While only the policies in the development plan have special status in deciding planning applications, (i.e. for the purpose of any determination under the Planning Acts, the determination must be made in accordance with the Plan unless material considerations indicate otherwise), Supplementary Planning Guidance may be taken into account as a material planning consideration. In making decisions on matters that come before it, the Assembly Government and the Planning Inspectorate will give substantial weight to approved supplementary planning guidance which derives out of and has been prepared consistent with the approach set out in national policy on the preparation of Local Development Plans. Put simply the requirements of the legislation mean that the following needs to be taken into account when considering a proposal:

1.8

- Whether the proposal meets the requirements of policies within the development Plan; and
- Weigh up all the other planning considerations to see whether they outweigh the conclusion of the Development Plan.²

¹ Update following the National Park Authority Meeting 5th November 2014

² Page 27 <http://www.wlga.gov.uk/publications-and-consultation-responses-imp/planninghandbook-a-guide-for-local-authority-members/>

2.0 **Context**

Housing Need

- 2.1 The National Park Authority is not a housing enabler in its own right. This role is fulfilled by Pembrokeshire County Council, which holds the statutory housing functions for the National Park Authority area. Whilst this SPG deals specifically with The National Park Authority, need is assessed by the County Council. It is understood that an updated Local Housing Market Assessment, which will enable a more robust identification of need by community council area, is currently being undertaken.
- 2.2 The Housing Register for Pembrokeshire states that there was a backlog of around 460 affordable houses in the National Park Authority in July 2008. In addition to this, the newly arising need for affordable housing equates to between around 60 and 100 households per year between 2006 and 2021.
- 2.3 Set against this level of current and emerging need for affordable housing, only 21 of the 289 dwellings to have been built in the National Park Authority area between 2007 and 2013 were affordable homes. This represents just 7% of the total housing supply and equates to 3 affordable dwellings per year being built in the National Park Authority area, compared to a target of delivering an average of 35 affordable dwellings per annum over the LDP period (2006-2021). Clearly affordable housing needs are not being met.
- 2.4 House prices within the National Park vary and are generally higher than other parts of Pembrokeshire due in most part to being located in an area of high landscape quality. For example, a 3-bed semi-detached house in Newport would cost £254,000. A similar property in Tenby would cost £245,000 and £120,000 in the North East of the National Park Authority area³.
- 2.5 According to the 2012 Annual Survey of Hours and Earnings, the mean average full time gross salary for those living within Pembrokeshire County was £19,646. This is lower than the full time gross annual salary for Wales (£22,472) and the British figure of £26,865.
- 2.6 The higher than average house prices in some areas of the National Park, coupled with the local earnings that are lower than UK average, creates a situation where the average affordability ratio is very high and a large proportion of local people living and working in the National Park cannot access the housing market due to affordability issues.

Types of Affordable Housing

- 2.7 For the purposes of the land use planning system, affordable housing is defined as housing that is available exclusively to people in housing need that cannot afford to access the open market. Affordable housing is housing

³ Source Andrew Golland Associated

available for sale or rent at below market values and is required to remain as affordable for the initial and future occupiers. This is controlled by way of a Section 106 agreement between the developer and the National Park Authority.

- 2.8 A broad definition of housing need exists, including households on means tested benefits and very low incomes for whom rented accommodation might be most appropriate, and those that are unable to access open market housing because of the gap between their incomes and house prices in the local area.
- 2.9 According to TAN2 there are two different types of affordable housing that are available to meet the spectrum of needs that exist:

Social Rented Housing

- 2.10 This comprises affordable homes that are available for rent at below the market price. The housing ~~will normally be is~~ managed by a Registered Social Landlord or County Council. TAN2 refers to these properties being rented at social rent levels. Unless social housing grant is available for the development of the affordable housing then then rental levels will be above benchmark rents but below -local housing allowance rent levels. or by private management companies or Community Land Trusts. Rental levels are set by Welsh Government (benchmark rents). This in effect will be Registered Social Landlords providing intermediate housing for rent.
- 2.11 The price at which affordable houses for rent are sold to operators is based upon the Welsh Government's Acceptable Cost Guidelines, upon which a discount is applied. The developers will normally receive 55% of the ACG value for affordable housing for rent.

Intermediate Housing

- 2.12 Intermediate Housing can perform an important function between social rented homes and those on the open market. A number of different types of intermediate housing are available and demand for them can fluctuate, depending upon market area and economic conditions.

Intermediate Housing for Rent

- 2.13 Intermediate rents are higher than benchmark rents but below the value of Local Housing Allowance.
- 2.14 Whilst actual figures vary, rent charged is often 20-30% lower than would be demanded for a home in a similar area if renting from a private landlord.

Low Cost Home Ownership

- 2.15 This comprises affordable homes that are available for sale at below the market price. This represents an affordable option for households that would like to own their property but are unable to purchase on the open market.

- 2.16 The price of low cost home ownership properties will most commonly be set by way of a defined percentage discount from open market values. The cost will typically be capped at a maximum of 70% of their open market value, as determined by an independent General Practice Chartered Surveyor who is active and experienced in the local residential sales market. In the event of any disagreement between the applicant and the National Park Authority arising from this valuation, either party may, at their own cost, seek an appointment by the President of the RICS of an Independent General Practice Surveyor active and experienced in the local residential sales market whose opinion of value will be final and binding.

Shared Ownership

- 2.17 This enables the occupier to purchase an equity share in their home, usually through a mortgage with rent being charged on the remaining share that they do not own. Over time, occupiers may be able to acquire additional shares up to a maximum that would be defined in the Section 106 agreement.

Self-Build

- 2.18 Self-build housing can make a positive contribution to meeting local housing need. Affordable self-build housing can contribute towards affordable housing requirements where the landowner/developer of a site provides a specified number of fully serviced plots. Delivery of this can be more difficult, particularly if plots are only made available to households on the affordable housing register, as some of these will have little appetite, and lack the skills or resources, to undertake self-build. Therefore, the County Council has also taken the position that provided that an interested party can demonstrate clearly that they are in housing need, they do not actually need to be on the Common Housing Register to acquire self build plots.

3.0

Policy Background

3.1

Policies and Guidance issued by the Welsh Government and the National Park Authority form the policy context for the determination of planning applications and appeals.

Planning Policy Wales (PPW)

3.2

Planning policy on affordable housing is contained in PPW, Edition 6 (February 2014), Technical Advice Note 2: Planning and Affordable Housing (2006) and Technical Advice Note 6: Planning for Sustainable Rural Communities.

3.3

PPW states that a community's need for affordable housing is a material planning consideration that must be taken into account in formulating development plan policies. Paragraph 9.2.14 of PPW states:

"Affordable housing for the purposes of the land use planning system is housing where there are secure mechanisms in place to ensure that it is accessible to those who cannot afford market housing, both on first occupation and for subsequent occupiers."

3.4

PPW clarifies that affordable housing includes social rented housing owned by local authorities and registered social landlords; and intermediate housing where prices or rents are above those of social rent but below market housing prices or rent. All other types of housing are referred to as 'market housing'.

Technical Advice Note 2 (Planning and Affordable Housing)

3.5

TAN2 provides technical guidance on the role of the planning system in delivering affordable housing. As well as defining affordable housing and providing advice to local planning authorities on how to determine affordability (Para 3.1), TAN2 also requires local authorities to:

- 1 *Include an affordable housing target in the development plan which is based on the housing need identified in the local housing market assessment.*
- 2 *Indicate how the target will be achieved using identified policy approaches.*
- 3 *Monitor the provision of affordable housing against the target (via the Local Development Plan Annual Monitoring Report) and where necessary take action to ensure that the target is met (Para 3.2).*

3.6

In terms of affordable housing targets, TAN2 explains that the affordable housing target should take account of the anticipated levels of finance available for affordable housing, including public subsidy, and the level of developer contribution that can realistically be sought (Section 9.0).

Technical Advice Note 6 – Planning for Sustainable Rural Communities

- 3.7 TAN6 emphasises the need for planning authorities to employ all available policy approaches, in an innovative way, to maximise the supply of affordable housing. Additionally, a proactive and flexible approach should be applied by Local Planning Authorities including efficient working with local delivery partners, particularly registered social landlords. Investigating a broader range of delivery options is also of key importance.
- 3.8 Such methods could include community land trusts, private landlords and unsubsidised affordable housing where the affordable housing is provided by a developer, or directly by the intended occupier. (Paragraphs 4.2.1 to 4.2.4).

Pembrokeshire Coast National Park Authority Local Development Plan

- 3.9 The National Park Authority LDP contains policies to seek and facilitate the sustainable delivery of affordable housing to meet local needs.
- 3.10 Of key relevance is Policy 45, which sets out the affordable housing requirement of 530 affordable homes within the Plan period.
- 3.11 Policy 45 also sets out the National Park Authority's approach to the release of land in exceptional circumstances, as well as the policy approach to dealing with proposals for single residential units.
- 3.12 Policy 45 clarifies that where it can be proven that a proposal is unable to viably deliver the total amount of planning contributions, priority will be given to the delivery of affordable housing in any further negotiation provided that it can be demonstrated that the proposal would not unduly overburden existing community infrastructure provision.

Affordable Housing Requirements

Requirements for Affordable Housing in the National Park

This section sets out how the National Park Authority will approach the negotiation of affordable housing. Its starting point to negotiations is set out below:

- 1 The National Park Authority will seek to negotiate an affordable housing contribution on all residential development sites.
- 2 The affordable housing requirements on sites that are allocated for residential development ranges from 50% to 100%. Full details are provided on a site-by-site basis in the LDP and Appendix 1.
- 3 The National Park Authority, in determining planning applications will apply further flexibility in applying Policy 45 in line with the recommendations of the Pembrokeshire Coast Affordable Housing Delivery Project Report.
- 4 The National Park Authority will use the County Council's register of people that have expressed an interest in and are eligible for Low Cost Home Ownership, together with the ChoiceHomes@Pembrokeshire list, to seek an appropriate mix of affordable housing tenures on development sites. However, its starting point would be to seek a mix comprising of 80% Social Rented properties and 20% Low Cost Home Ownership.
- 5 In the case of proposals for two or more dwellings, the affordable housing contribution will normally be expected on site.
- 6 The National Park Authority will seek a financial contribution ~~of £250~~ per square metre towards the provision of affordable housing as part of any proposal for a single dwelling. [The contribution sought will depend on the location of the proposal. Appendix 5 provides the breakdown. The Authority's website maps these areas.](#)⁴ The calculation of the affordable housing contribution would take account of the internal area (all floors) of individual dwellings and garages. Areas used as balconies and car ports and other external spaces would not contribute towards the affordable housing contribution. There are certain developments that are exempt from this financial contribution. These comprise:
 - i Affordable housing for local people as defined in the SPG;
 - ii Replacement dwellings; and,
 - iii Accommodation limited in its occupation by condition or legal agreement, for example as an agricultural worker or managers dwellings or self-catering accommodation.
- 7 [\(New paragraph\) 'Where the percentage of affordable housing required results in a number of units and a fraction of a unit the requirement will be](#)

⁴ [Pembrokeshire Coast National Park - Calculating Affordable Housing](#)

rounded down e.g. 25% of 25 units = 6.5, therefore 6 affordable homes will be expected.’ –(from para 4.3 of the old guidance). Where the percentage of affordable housing required on sites of two or more units results in a fraction of a unit then an affordable housing contribution will be will be expected, e.g. 20% of 2 = 0.4 then ~~an~~ the affordable housing contribution rate for the submarket area will be applied to each house.

Delivery of Affordable Housing

- 4.2 The amount of affordable housing required in the National Park is greater than can be provided by public subsidy through Social Housing Grant. As an increase in Social Housing Grant is unlikely at the current time, affordable housing delivery will be largely reliant upon contributions made as part of open market residential development.
- 4.3 The National Park Authority is mindful of the economic climate and the impact of its affordable housing requirements upon the viability of development. It will therefore give careful consideration to economic viability and will adopt a positive approach to the negotiation of viability matters through the flexible implementation of its policies. This applies both to on-site provision of housing and affordable housing contributions on single dwellings. However, a viability assessment will be required to justify any deviation from the stated policy requirements.

Mechanisms to Increase the Delivery of Affordable Housing

- 4.4 The National Park Authority is committed to ensuring the delivery of affordable housing to meet identified local needs and will give due consideration to the following mechanisms where the provision of the level of on-site affordable housing that is required by the LDP is not viable.
- 1 The National Park Authority will support the principle of affordable housing on exceptions sites. This constitutes development of small sites within or on the edge of existing Centres, which would not otherwise be allocated in the Development Plan, for 100% affordable housing. Open market housing would be resisted on such sites which would therefore not attract a residential land value. For this reason, the provision of 100% affordable housing schemes could be viable. Proposals for affordable housing schemes on exceptions sites would be subject to all other development management criteria to ensure that they do not have an unacceptable impact upon the surrounding area. Typically, Registered Social Landlords have been unable to consider developing exception sites where land costs are more than £5,000 a plot.
 - 2 The National Park Authority recognises that the viability of affordable housing can depend upon the proposed tenure split. Whilst recognising the importance of seeking to meet the need for different types of affordable housing, the National Park Authority will seek to apply a flexible approach in respect of the split between different affordable housing sectors.

- 3 Technical Advice Note 2: Planning and Affordable Housing advises that affordable housing should normally be provided on site. However, it acknowledges that off-site provision may be acceptable in exceptional circumstances and where there is a clear advantage to the arrangement. The National Park Authority will require a developer to demonstrate why off-site provision would be more beneficial in terms of the viability and deliverability of development, the number of affordable houses that could be provided and the sustainability of development. In such cases, the National Park Authority will consider the appropriateness of seeking a financial contribution towards the provision of affordable housing in the local area. The National Park Authority will work with the County Council, which administers all affordable housing contributions, to ensure that they can be spent, where possible in the area around the application site. The normal mechanism for dealing with affordable housing contributions will be via Section 106 Agreements, attached to planning permissions. Appendix 2 sets out the how contributions will be spent in the local area.
- 4 In cases where it is proven that the development of affordable housing is not viable, the National Park Authority will discuss the potential opportunity for a developer to contribute fully serviced building plots which might subsequently be developed by Registered Social Landlords or by persons on the affordable housing waiting list as self-build projects. Depending upon the value of the plots and the scale of any identified viability challenge, an affordable housing contribution might be sought alongside any serviced plots.
- 5 Where Welsh Government funding is available in the form of Social Housing Grant, the money will be used to develop additional affordable housing units in the National Park Authority area, including on appropriate exception sites.

Economic Viability

- 4.5 Economic viability is of utmost importance in the delivery of housing and affordable housing in the National Park. If a scheme is not financially viable, development will not be realised, and hence there is will no planning gain either in the form of Affordable Housing or other Section 106 contributions.
- 4.6 The National Park Authority recognises that in some areas the LDP targets in terms of affordable housing will be challenging to achieve. The National Park Authority is mindful that policy impacts may reduce residual scheme values although this should not necessarily make schemes less viable.

Positive approach to viability negotiation

- 4.7 The National Park Authority recognises that economic viability is a key factor in delivering affordable housing. The National Park Authority will adopt a positive approach to negotiation to consider viability issues and will expect a robust and comprehensive viability submission to accompany all planning applications.

- 4.8 The National Park Authority will be flexible when considering viability as outlined in Policy 45 of the LDP.

Considering Alternatives

- 4.9 The National Park Authority welcomes the opportunity for pre-application discussion to agree design principles for a site's development. Within this framework the National Park Authority will adopt a positive approach towards the consideration of alternative methods and will expect applicants to have demonstrated how they have improved the viability of schemes by considering alternative design. The applicant should consider the following factors when trying to improve a scheme's viability.

- 1 Amount (different densities and number of units);
- 2 Type (different type of dwellings);
- 3 Size (different dwelling sizes);
- 4 Tenure (type and tenure mix);
- 5 Layout (Careful consideration of layout can improve value);
- 6 Design and specification (challenge expensive aspects of the scheme's build costs and test costs associated with design aspects which are not essential); and,
- 7 Phasing (careful phasing can help improve cashflow).

Alternative options to deliver affordable housing

- 4.10 Where a scheme is demonstrated to be unviable with the policy level of affordable housing, the National Park Authority will sequentially consider a range of alternative options to secure the maximum level of affordable housing. These will vary depending on site specific circumstances and constraints but will include:

- 1 Consideration of alternatives;
- 2 The use of public subsidy, if available;
- 3 Revised tenure mixes;
- 4 Consideration of alternative provision, for example off-site financial contributions or serviced plots;
- 5 Reduction of other planning obligation contributions (provided that it can be demonstrated that the proposal would not unduly overburden existing community infrastructure provision); and,
- 6 Mechanisms to reappraise schemes at commencement.

Economic Viability Assessment (EVA)

- 4.11 Judgements about viability can only be made by the National Park Authority on the basis of full and robust development appraisals. Therefore it is important that these are provided up front and in all circumstances.

- 4.12 Assessments which provide robust and detailed information will be dealt with positively and efficiently by the National Park Authority. This process will include a thorough appraisal of the scheme economics and will require co-operation and an open book approach between the applicant, developer or landowner and the National Park Authority. The level of detail required in the EVA is provided in Appendix 4.
- 4.13 Failure to provide adequate detail can result in the National Park Authority asking for further information which can lead to delay, or ultimately, the refusal of planning permission.
- 4.14 The National Park Authority recognises that on occasions there will be disagreement between the National Park Authority and the applicant.
- 4.15 The National Park Authority will use the 'Wales Development Appraisal Toolkit' (formerly known as the Three Dragons Toolkit) (DAT) as a means of dispute resolution (see Appendix 3). Should both parties continue to be in disagreement, the viability assessment will be referred to an independent assessor familiar with the DAT and its principles.

Design

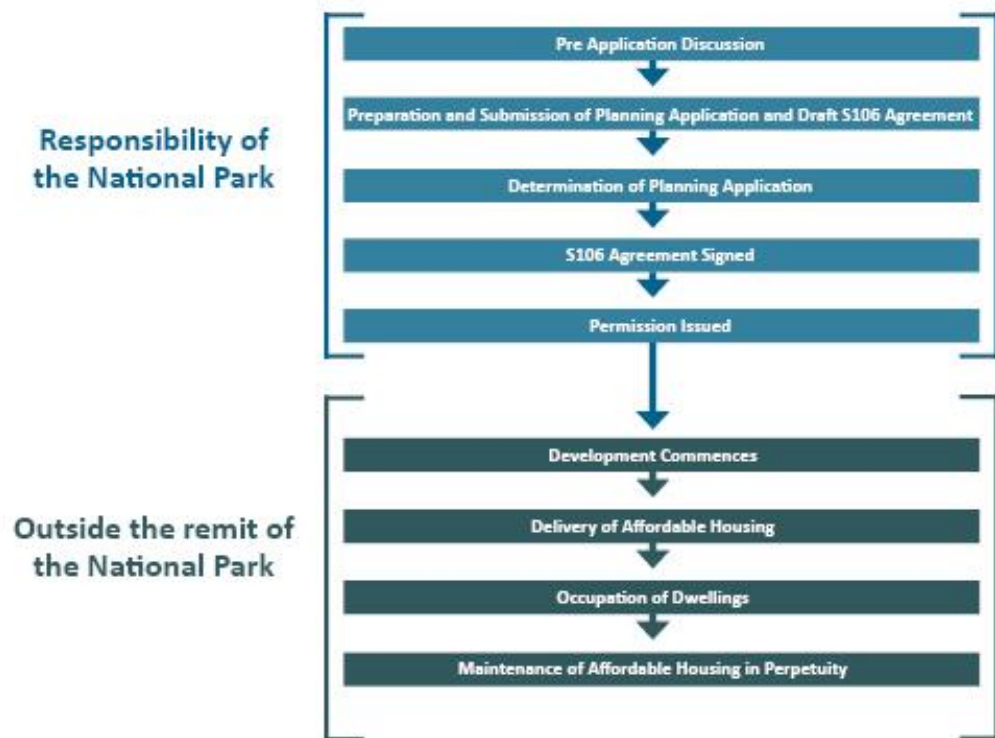
- 4.16 Design considerations must be taken into account and factored into viability considerations. The National Park Authority is the planning authority for the National Park and development will naturally require a high standard of design due to the high landscape quality of the area. However it is important to note that good design does not necessarily have to be expensive design.
- 4.17 Sustainable building standards must also be adhered to. In Wales, a minimum of Code for Sustainable Homes Level 3 must be achieved for all new housing. It is highly unlikely that Social Housing Grant will be available to support schemes. But if accommodation is built using Social Housing Grant it will be required to meet Welsh Government Development Quality Requirements. These set out minimum space standards and technical specifications and are available from Registered Social Landlords. The Welsh 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.

5.0 Affordable Housing Planning Process

Introduction

5.1 This section outlines the process of preparing and submitting a planning application for residential development that includes an element of affordable housing. It also explains the technical process in a simple manner and provides useful tips on how to negotiate the process smoothly without potential delay. The diagram below shows what stages of the planning process are the responsibility of the National Park Authority and what lies beyond the National Park Authority's remit.

Process



Pre-Application Discussion

5.2 This stage will provide useful information for the applicant regarding what is required in terms of affordable housing. The pre-application discussion will provide an opportunity for the amount and type of affordable housing to be explained and agreed from the outset. This is to help provide a better understanding of the housing requirements and the overall layout and viability of the proposal.

5.3 Engagement at this stage is encouraged as it can help to avoid delays in the formal determination process as issues relating to affordable housing and other

Section 106 requirements and development viability can be discussed prior to the development scheme being fixed. The National Park Authority can also explain to the applicant how to complete a draft Section 106 Agreement prior to submission of an application.

Preparation and Submission of Planning Application

- 5.4 The preparation and submission of the planning application is an important stage as it includes determining the amount of affordable housing to be provided as well as testing the viability of the scheme.
- 5.5 Affordable housing details should be set out in an Affordable Housing Statement.
- 5.6 This stage also provides an opportunity for a draft Section 106 Agreement to be submitted alongside the planning application. The early submission of a draft Agreement will enable negotiations on its contents to take place during the determination stage and thereby ensure that planning permission can be granted more quickly.
- 5.7 To help ensure a smooth determination, the National Park Authority advises applicants to use the standard Section 106 template. The County Council will prepare legal agreements on behalf of applicants. The County Council's legal costs are a standard £500 charge. The County Council does, however, reserve the right to increase the costs in the event of complicated agreements or protracted correspondence.

Determination of Planning Application

- 5.8 Planning permission will be granted when the s106 is signed.
- 5.9 If the Section 106 agreement is not signed within the 8 week determination period for the application (or in exceptional circumstances within a longer period where agreed in writing with the Authority) the National Park Authority will refuse the planning application.

Delivery of Affordable Housing

- 5.10 The delivery of affordable housing should keep pace with that of market housing. On larger schemes, the National Park Authority may wish to ensure that affordable housing is delivered in phases in parallel with the development of market housing, and will look to see this reflected in Section 106 planning agreements. The standard approach is for Section 106 agreements to include a clause requiring a reasonable amount of affordable units to be occupied before market housing can be occupied.

Maintenance of Affordable Housing

- 5.11 The future affordability, management and ownership of any affordable dwellings will be ensured in perpetuity through the imposition of planning agreements under Section 106 of the Town and Country Planning Act which

shall be applied to planning permissions. Section 106 agreements will apply to successive owners.

- 5.12 The National Park Authority has a standard Section 106 template in place and the content will be agreed by the landowner and/or prospective developer in advance of planning consent being granted. However the National Park Authority recognises that the Section 106 agreement needs to be flexible to respond to changing circumstances and will discuss proposals for amendments to the Section 106 agreement with applicants. Evidence to justify any revisions to a Section 106 agreement will be sought by the National Park Authority.

Who can occupy?

- 5.13 Consultation undertaken as part of the preparation of this guidance identified some support for a more tightly structured approach to local need.

Social Housing

- 5.14 The criteria for assessing housing needs are set out in the ChoiceHomes@Pembrokeshire Allocation Policy. The criteria is based on points such as:
- 1 Customers who are currently unintentionally homeless;
 - 2 Customers sharing accommodation with family and/or friends and/or others who will not be rehoused with the customer; and,
 - 3 Customer that need to move because they cannot afford to live at their current accommodation.
- 5.15 A full list of the criteria can be found at www.choicehomespembrokeshire.org.
- 5.16 When a customer is accepted onto the Register they will be placed in one of three 'bands'. Which band will depend on the customer and their households housing need, based on the information provided on the application form. Customers in Gold and Silver bands are classed as being in housing need and those in Bronze as low priority need.
- 5.17 When a property is advertised, customers on the Register who would like to live there can apply for the property. The customer with the highest need and the earliest date of application will then be offered a tenancy.
- 5.18 The ChoiceHomes@Pembrokeshire has a Rural Communities Policy applicable to certain areas in the County which requires customers to demonstrate they meet certain criteria. Households who demonstrate these criteria are given additional preference in respect of properties advertised for letting with local connection in that area.
- 5.19 A customer will qualify for a local connection to the rural area (electoral ward) if he/she or a member of the household:

- 1 Has lived within the area as their only or principal home, continuously for the last 5 years, or
- 2 Can demonstrate that they have lived in the area for at least 10 years previously, before moving away, and that they have one of the following reasons to return:
 - 3 A permanent job (at least 16 hours per week), or unpaid work for the emergency services or coast guard, is located within the area, and they have a need to live close to work. This can include volunteering for the emergency services and RNLI.
 - 4 A child who is a member of the household attends a school that is located within the area, and they currently have to travel more than 10 miles each way to attend this school. The child must be expected to attend this school for at least the next 3 years.
 - 5 A parent or close family member (grandparents, parents, siblings, child) who lives in the area as their only or principal home and who would provide support to or receive support from you. This support:
 - i must not be provided by others (including professional care), and
 - ii would dramatically improve the quality of life of the person receiving the support, and
 - iii must not currently be sustainable because you currently live too far away to reasonably provide or receive this support.

Affordable Rental and Low Cost Home Ownership

5.20 Where a Trust or private management company manages affordable rented homes, or the properties are for sale, they will be made available to local people in housing need, using a time-restricted cascade approach which gives the first opportunity to acquire the property, to those most local. The National Park Authority's definition of local, for affordable housing purposes is as follows:

- 1 In the first instance, the applicant will have a connection (See 5.19) to the town or community council area⁵ in which the property is located or any adjoining town or community council area to that in which the property is located, including those in neighbouring local planning authority areas;
- 2 After a defined period of time, the search for an occupant will be extended to the rest of Pembrokeshire.

5.21 The length of time that a property must be advertised and available for is set out below:

⁵ Excluding the main towns of the County, Haverfordwest, Milford Haven, Pembroke/Pembroke Dock, Neyland, Fishguard and Goodwick.

Table 5.1 Affordable Rental and Low Cost Home Ownership Advertisement Requirements

Cascade Level	Affordable Rent	Low Cost Home Ownership
Local/neighbouring Town or Community Council area ⁶	6 weeks	6 weeks
Remainder of Pembrokeshire and simultaneously offered to the Authority and RSL to purchase at 55% of ACG for rental properties and 70% of market value for LCHO	6 weeks	6 weeks
Total marketing time ⁷ before seller may offer the property on the open market	12 weeks	12 weeks

- 5.22 If a qualifying occupier for an affordable property has not been found within the first stage of the occupancy cascade, the Council and RSLs will be given an opportunity to purchase the property at the same time as the qualifying area is extended County wide, as a means of giving every opportunity to keeping the dwelling affordable. Should the second stage be unsuccessful the property may be offered for sale on the open market, on the basis that the definition of qualifying occupier shall be extended for the proposed sale to mean “any willing purchaser”. Any such sale shall be subject to provisions required by the National Park Authority to protect its future affordability (such as including limiting any resale price).
- 5.23 The National Park 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 general aim of ensuring that affordable housing is efficiently allocated and fully utilised.
- 5.24 A person in financial need is an applicant who after financial assessments cannot afford to resolve its situation without subsidy or assistance or that the applicant has sufficient money to pay for the option chosen.
- 5.25 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.
- 5.26 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.
- 5.27 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, whichever is the higher, it is affordable.

⁶ Excluding the main towns of the County, Haverfordwest, Milford Haven, Pembroke/Pembroke Dock, Neyland, Fishguard and Goodwick.

⁷ Marketing time is the time during which the property is advertised prior to the receipt of an offer. If a sale or rental agreement collapses, the cascade approach and time available for marketing begins again.

6.0 **Monitoring and Review**

6.1 It will be necessary for planning policies and supplementary planning guidance to be reviewed as necessary over time to reflect change in the economic climate. It is important to recognise that viability can improve as the economy improves and therefore, affordable housing targets can be increased as well as reduced.

6.2 The National Park Authority recognises that it will need to monitor changes in values and costs as they affect viability. The following key indicators will be regularly reviewed:

- 1 House prices – data which includes second hand as well as new properties and provides a robust indicator of price trends.
- 2 Build costs – Pembrokeshire benchmark build costs and relevant BCIS index; and,
- 3 Affordable rents – Local Housing Allowance data.

6.3 The National Park Authority will trigger a review of the SPG if there is a 10% change in any one indicator sustained over a 12 month period or will consider a review if:

- 1 There is a plus or minus change of between 5-9% in any two indicators sustained over a 12 month period; or,
- 2 There is less than 10% change in indicator(s) but change is being sustained or if evidence indicates that sustained change has occurred in other development costs e.g. finance costs, developer return required.

6.4 A full review of the above will not necessarily lead to update an updated SPG or policy.

Re-running of the Development Appraisal Toolkit

6.5 Alongside the drafting of the SPG, Andrew Golland Associates (AGA) has rerun the development appraisal toolkit to provide a revised viability appraisal of allocated sites and provided a report on expected current residual values.

6.6 The work undertaken by AGA provides a robust baseline position for the revised SPG to work from. Appendix 5 to this updated SPG provides a summary sheet of the rerun of the viability assessment. More detail can be found in the Project Report which is published alongside this SPG.

Appendix 1 DELETE

Affordable Housing Requirements on Allocated Sites

	LDP Proposals Map ID		Residential Units	% Affordable Units	Affordable Housing Provision Expected
Broadhaven	HA734	Land south of Driftwood Close	8	50	4
Broadhaven	MA776	Land NE of Marine Road	35		
Lawrenny	HA821	Land adj Home Farm	30	50	15
Crymych	HA750	Depot Site	15		8
Dale	HA382	Castle Way	12	80	10
Dinas Cross	HA387	Land opposite Bay View Terrace	12	100	12
Herbranston	HA732	East of Herbranston Hall	12	50	6
Manorbier	HA821	Green Grove	5		3
Jameston	HA436	North of Landway Farm	7		1
Jameston	HA730	Land opposite Bush Terrace	35	50	18
Manorbier Station	HA848	Field opp Manorbier VC School	19		10
Lawrenny	HA559	Adjacent Home Farm	30		15
New Hedges	HA813	Rear of Cross Park	30	60	18
Newport	HA825	Land north of Feidr Eglwys	20	70	14
Solva	HA384	Land adj Bro Dawel	18	50	9
Solva	HA792	Bank House, Whitchurch Lane	15	50	8
St David's	HA737	West of Glasfryn Road	90		45
St David's	HA789	Land adj Ysgol Bro Dewi, Nun St	10		5
St Ishmaels	MA733	Land adjacent school	40		
Tenby	HA377	Brynhir	168	60	101
Tenby	HA723	Former Cottage Hospital Site	10		6
Tenby	HA724	Rectory Car Park	50		30
Tenby	HA727	Land west of Narberth Road	25		15
Tenby	HA752	Butts Field Car Park	80		48
Tenby	HA760	Reservoir Site	12		7
Trefin	HA738	Land north of Heol Crwys	15		50

~~Appendix 1~~ Appendix 2 Use of S106 Contributions in Local Area

The unilateral agreement will require that the development permitted shall not be occupied until the affordable housing contribution has been paid to Pembrokeshire County Council.

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 Park⁸. 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.

⁸ Excluding the main towns of the County, Haverfordwest, Milford Haven, Pembroke/Pembroke Dock, Neyland, Fishguard & Goodwick.

Appendix 2 Appendix 3 Assessment of Viability

Development Appraisal Toolkit (DAT) for Wales

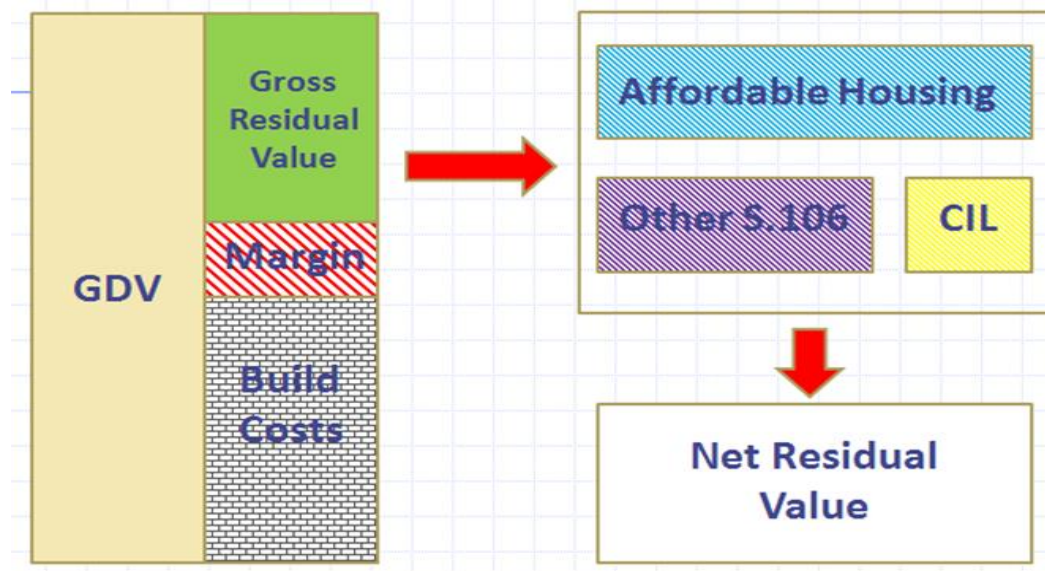
Background

The National Park Authority recognises that applicants will utilise different appraisal models when submitting viability related information.

The National Park Authority's preferred approach is however to use the Wales-wide Development Appraisal Toolkit (DAT). This is a bespoke version for Wales which is based on AGA:3D Toolkit and which is the industry standard model used in England.

Main principles of the DAT

The DAT compares the potential revenue from a site with the potential costs of development and then calculates a residual value for a scheme. In estimating the potential revenue, the income from selling dwellings in the market and the income from producing specific forms of affordable housing are considered. The estimates involve (1) assumptions about how the development process and the subsidy system operate and (2) assumptions about the values for specific inputs such as house prices and building costs.



The DAT takes into account policy impacts in terms of affordable housing, other Section 106 contributions and/or the Community Infrastructure Levy.

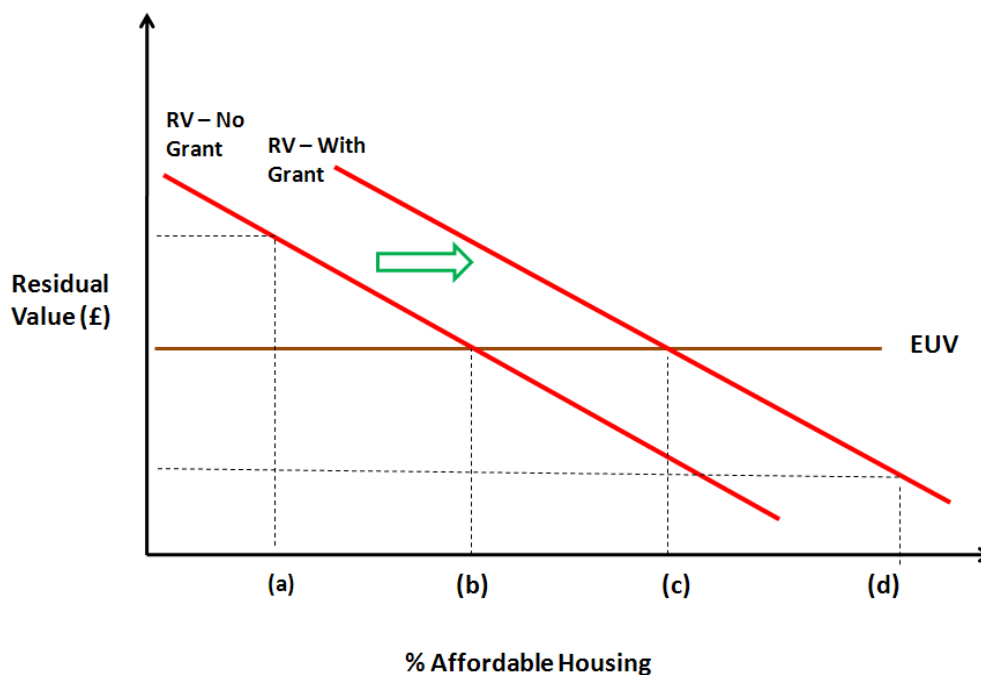
The DAT works on the basis that to make a scheme viable, three 'interests' must be satisfied:

- 1 The developer (a profit of around 20% on Gross Development Value);
- 2 The land owner (a competitive return versus land value benchmark);
- 3 The National Park Authority (where policy requirements have been met).

The National Park Authority accepts that all three parties will not in every case meet their requirement and expectations, but the DAT can be used to help negotiate a way through the competing demands.

The position of the land owner

The National Park Authority fully recognises the importance of ensuring that land owners receive a competitive return. A scheme is unlikely to proceed where the costs exceed the revenue (i.e. a negative residual value). Simply having a positive residual value will not guarantee that development happens. The existing use value of the site will play a role in the mind of the land owner in bringing the site forward.



The diagram shows how this operates in theory. Residual value (RV) falls as the proportion of affordable housing increases. At point (a), RV is greater than Existing Use Value (EUUV) and provided that this margin is sufficient for the land owner to bring the site forward, then it will be viable.

At point (b) the RV is equal to the EUUV and there is relatively little incentive in theory to bring the site forward.

Beyond points (a) and (b), the scheme will not come forward as the developer will not be able to pay the land owner enough relative to the land owner's EUUV.

Where grant is available (points (c) and (d)), viability for affordable housing is enhanced. Up to point (c) RV is greater than EUV and there is a land owner incentive. At point (c) RV is equal to EUV and so, whilst a higher affordable housing contribution is likely than say at point (b), in principle the land owner is in exactly the same position as at (b).

At point (d), the scheme will not be viable even with grant.

The DAT is set up in such a way that it is consistent with case law and precedent and reflects these considerations.

Scope of the DAT

The DAT can, and has been used, in a number of different ways. These are set out below:

- 1 For policy development work; for example testing for viable affordable housing targets and thresholds; and for testing for CIL Charging. Indeed for 'whole Plan' testing where these impacts are considered together;
- 2 Site specific appraisals and negotiations. These can be at a variety of levels: urban extensions, masterplanning, regeneration schemes and small sites;
- 3 For calculating commuted sums. A range of approaches are used here, but the DAT can deal with all eventualities;
- 4 Modelling the impacts of subsidy. The DAT was developed in large measure to test the extent to which additional Section 106 contributions might be delivered if subsidy was available.

~~Appendix 3~~ Appendix 4 Economic Viability Assessment Checklist

Development income information

- 1 Open Market Sales income
- 2 Social / Affordable rent income
- 3 Income from intermediate sales
- 4 Income from shared ownership units
- 5 Other potential revenue streams, including grant/subsidy

Development costs

- 1 Build costs (£/sqm of gross internal area), provided for different types of dwelling
- 2 Costs of external works and infrastructure
- 3 Costs of abnormal works
- 4 Professional fees
- 5 Finance costs
- 6 Marketing costs
- 7 Contingency
- 8 Planning application costs

Site values

- 1 Current (existing use) land valuation of development site

Developer profit

- 1 % profit margin for open market and affordable units

Phasing

- 1 Anticipated build period
- 2 Anticipated timings of sales and other incomes
- 3 Timings of s106 contributions

Provision of affordable housing and affordable housing contributions

This appendix sets out the changes affecting housing sites already allocated in the local development plan and new housing sites.

Main Changes:

1. Housing sub-market areas

For new housing sites (those not already allocated in the plan) and single dwelling applications, the new guidance introduces a more flexible regional approach to the application of Policy 45 (Affordable Housing) of the Local Development Plan by varying the percentage or financial affordable housing contributions regionally.

This is done by dividing the National Park area into housing sub market areas, which group areas with similar housing market conditions together to take into account the market values achievable in those areas and the effect that has on development viability.

For more details on these sub market areas please see paragraph 3.16-3.17 and table 3.1 on page 11 of the [Affordable Housing Delivery Project Report](#), which is available to view on our website.

The following table sets out the percentage provision and rate of affordable housing contribution that Authority considers reasonable for each of the housing sub-market areas now as opposed to when the percentage was originally set when the Local Development Plan was adopted.

Sub-market housing area	Local Centre	Rural Centres	New Percentage of affordable dwellings required on site	New financial contribution for single dwellings Rate (m²)	Percentage under Policy 45 of affordable dwellings required on site	Old financial contribution for single dwellings *
Newport	Newport	Dinas Cross	50%	£250	70% (100% in Dinas Cross)	£250
Tenby	Tenby	Milton, Manorbier, Manorbier Station, Jameston	50%	£250	60%	£250
South East Coast	Saundersfoot	New Hedges, Pleasant Valley; Amroth; Summerhill	30%	£150	60%	£250
Estuary Hinterland	N/A	Lawrenny, Hook; Llangwm, Houghton	20%	£100	50%	£250
South West Coast	N/A	Bosherston, Angle	20%	£100	50%	£250
North East NP	Crymych	Felindre Farchog	20%	£100	50%	£250

Sub-market housing area	Local Centre	Rural Centres	New Percentage of affordable dwellings required on site	New financial contribution for single dwellings Rate (m ²)	Percentage under Policy 45 of affordable dwellings required on site	Old financial contribution for single dwellings *
St Brides Bay	N/A	Little Haven; Broad Haven; Dale; Marloes; St Ishmaels, Herbranston	30%	£150	50% (80% in Dale)	£250
St Davids and North Coast	St David's	Roch, Newgale, Solva, Trefin; Square and Compass	30%	£150	50%	£250

*As of October 2013

2. Local Development Plan Allocations

Table 3.5, page 19 of the [Affordable Housing Delivery Project Report](#) shows the results of updated viability assessments for the Local Development Plan site allocations and provides a RAG (Red-Amber-Green) colour score to indicate whether or not a site is viable at a given percentage provision of affordable housing and Acceptable Cost Guidance rate (ACG)⁹. Viability is determined by a threshold for Residual Land Value per hectare, PCNPA considers a site to be viable if it meets a residual value per hectare of £300,000 or more.

The table below provides a comparison between the affordable housing percentages for housing and mixed use site allocations set out in the Local Development Plan under Policy 42 and Policy 45 and those percentage provisions found to be viable after new viability assessments were carried out to inform the guidance.

The table has been updated to consider the viability of proposals at 5% intervals rather than just 10% intervals; to include the cost of incorporating sprinkler systems and to increase the developer profit from 17% to 20%. This takes account of the way in which Inspectors currently look at Local Development Plan viability in Examination.

Site ID	Settlement	Site name	New percentage assuming 55% ACG	'Old' percentage affordable housing provision (LDP Policies 42 and 45)	Updated for Sprinklers and 20% profit and 5% intervals viability testing
HA377	Tenby	Brynhir	50%	60%	No change
HA723	Tenby	Former cottage Hospital Site	50%	60%	No change
HA724	Tenby	Rectory Car Park	50%	60%	No change
HA727	Tenby	West of Narberth	50%	60%	No change
HA752	Tenby	Butts Field Car park, Tenby	50%	60%	40% (-10%)
HA760	Tenby	Reservoir Site, Tenby	50%	60%	45% (-5%)

⁹ % of the total cost of construction prices used by housing associations.

Site ID	Settlement	Site name	New percentage assuming 55% ACG	'Old' percentage affordable housing provision (LDP Policies 42 and 45)	Updated for Sprinklers and 20% profit and 5% intervals viability testing
HA825	Newport	North of Feidr Eglwys	40%	70%	No change
HA385	St David's	North of Twr-y-Felin	40%	Current permission for 0 affordable/ renewal 50%	35% (-5%)
HA737	St David's	St David's West Glasfryn Road	30%	50%	25% (-5%)
HA789	St David's	Adj Ysgol Bro Dewi, Nun Street	20%	50%	15% (-5%)
HA734	Broad Haven	South of Driftwood Close	40%	50%	35% (-5%)
HA382	Dale	Castle Way	30%	80%	No change
HA387	Dinas Cross	Opposite Bay View Terrace	50%	100%	No change
HA732	Herbrandston	East of Herbrandston	Not viable	50%	Not viable
HA436	Jameston	North of Landway Farm	40%	Current permission for 1 affordable/ renewal 50%	No change
HA730	Jameston	Opposite Bush Terrace	30%	50%	No change
HA821	Jameston	Green Grove	40%	50%	45% (+5%)
HA559	Lawrenny	Adjacent Home Farm	40%	50%	45% (+5%)
HA848	Manorbier	Field opp Manorbier VC	20%	50%	25% (+5%)

Site ID	Settlement	Site name	New percentage assuming 55% ACG	'Old' percentage affordable housing provision (LDP Policies 42 and 45)	Updated for Sprinklers and 20% profit and 5% intervals viability testing
	Station	School			
HA813	New Hedges	Rear of Cross Park	20%	60%	15% (-5%)
HA384	Solva	Adjacent to Bro Dawel	30%	50%	20% (-10%)
HA792	Solva	Bank House, Whitchurch Lane	20%	50%	10% (-10%)
HA738	Trefin	North of Heol Crwys	20%	50%	15% (-5%)
MA710	Tenby	Sergeants Lane, Tenby	40%	60%	35% (-5%)
MA776	Broad Haven	Land at Broad Haven north east of Marine Road	30%	37%	No change
MA895	Manorbier Station	Land part of Buttylands, Manorbier Station	40%	50%	45% (+5%)
MA773	St Ishmaels	Adjacent to School, St Ishmaels	30%	50%	No change

Site No	Settlement	% AH	EU	10% AH		20% AH		30% AH		40% AH		50% AH	
				55% ACG	42% ACG	55% ACG	42% ACG	55% ACG	42% ACG	55% ACG	42% ACG	55% ACG	42% ACG
387	Dinas Cross	100%	G	£2,812,000	£2,736,000	£2,272,000	£2,120,000	£1,732,000	£1,504,000	£1,188,000	£884,000	£640,000	£264,000
825	Newport	70%	G	£913,415	£890,244	£739,024	£691,463	£564,634	£493,902	£389,024	£295,122	£215,854	£98,780
377	Tenby	60%	G	£1,825,179	£1,763,393	£1,449,107	£1,325,536	£1,073,036	£887,857	£696,964	£450,000	£320,893	£12,143
436	Jameston	50%	G	£1,271,875	£1,240,625	£1,003,125	£937,500	£728,125	£631,250	£459,375	£328,125	£187,500	£25,000
710	Tenby	60%	B	£1,755,556	£1,677,778	£1,322,222	£1,166,667	£866,667	£655,556	£433,333	£144,444	£0	£-366,667
723	Tenby	60%	B	£3,452,941	£3,370,588	£2,747,059	£2,588,235	£2,047,059	£1,805,882	£1,352,941	£1,029,412	£641,176	£241,176
724	Tenby	60%	B	£3,919,149	£3,829,787	£3,307,447	£3,129,787	£2,696,809	£2,429,787	£2,085,106	£1,729,787	£1,474,468	£1,029,787
727	Tenby	60%	G	£2,155,422	£2,093,976	£1,780,723	£1,657,831	£1,402,410	£1,218,072	£1,026,506	£779,518	£649,398	£340,964
730	Jameston	50%	G	£739,645	£712,426	£576,923	£522,485	£414,793	£332,544	£252,071	£142,604	£89,349	£-47,337
752	Tenby	60%	B	£3,223,256	£3,087,209	£2,480,233	£2,208,140	£1,738,372	£1,329,070	£996,512	£451,163	£254,651	£-426,744
760	Tenby	60%	G	£2,206,667	£2,150,000	£1,760,000	£1,646,667	£1,313,333	£1,140,000	£866,667	£636,667	£423,333	£136,667
821	Manorbier	50%	G	£1,100,000	£1,075,000	£886,111	£833,333	£666,667	£588,889	£450,000	£347,222	£233,333	£102,778
848	Manorbier Station	50%	G	£878,125	£826,563	£545,313	£440,625	£210,938	£54,688	£-121,875	£-331,250	£-457,813	£-718,750
895	Manorbier Station	50%	B	£2,906,897	£2,824,138	£2,196,552	£2,034,483	£1,486,207	£1,241,379	£775,862	£448,276	£65,517	£-341,379
792	Solva	50%	G	£460,656	£427,869	£295,082	£231,148	£131,148	£36,066	£-32,787	£-159,016	£-195,082	£-354,098
737	St David's	50%	G	£1,079,667	£1,027,667	£775,333	£671,333	£470,333	£314,333	£166,000	£-42,333	£-139,333	£-399,333
789	St David's	50%	G	£498,214	£473,214	£375,000	£325,000	£251,786	£176,786	£126,786	£26,786	£5,357	£-119,643
738	Trefin	50%	G	£758,333	£704,167	£506,250	£400,000	£258,333	£95,833	£8,333	£-206,250	£-243,750	£-512,500
384	Solva	50%	G	£856,923	£810,769	£616,923	£526,154	£378,462	£241,538	£136,923	£-43,077	£-100,000	£-326,154
385	St David's	50%	G	£1,250,000	£1,202,000	£946,000	£848,000	£644,000	£498,000	£338,000	£144,000	£38,000	£-208,000
813	New Hedges	60%	G	£630,282	£594,366	£427,465	£355,634	£224,648	£116,901	£20,423	£-123,239	£-182,394	£-361,972
382	Dale	80%	G	£943,636	£905,455	£718,182	£641,818	£492,727	£380,000	£267,273	£116,364	£41,818	£-147,273
732	Herbranston	50%	G	£196,667	£167,333	£-147,333	£23,333	£-32,667	£-120,667	£-147,333	£-265,333	£-262,000	£-409,333
733	St Ishmaels	50%	G	£782,008	£759,833	£612,971	£569,038	£444,351	£378,661	£274,895	£187,448	£106,276	£-3,347
734	Broadhaven	50%	G	£1,864,000	£1,812,000	£1,372,000	£1,260,000	£880,000	£716,000	£388,000	£168,000	£-108,000	£-384,000
776	Broadhaven	50%	G	£1,260,000	£1,196,000	£857,000	£736,000	£456,000	£275,000	£57,000	£-185,000	£-343,000	£-645,000

Site No	Settlement	% AH	EU	10% AH		20% AH		30% AH		40% AH		50% AH	
				55% ACG	42% ACG	55% ACG	42% ACG	55% ACG	42% ACG	55% ACG	42% ACG	55% ACG	42% ACG
559	Lawrenny	50%	G	£1,603,738	£1,555,140	£1,246,729	£1,148,598	£889,720	£742,991	£533,645	£338,318	£177,570	-£67,290
750	Crymych	50%	B	£94,595	£37,838	-£97,297	-£210,811	-£289,189	-£459,459	-£481,081	-£710,811	-£675,676	-£962,162



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Addendum: some projects on stop due to the policy



Cottage Hospital site. On stop due to affordable housing policy



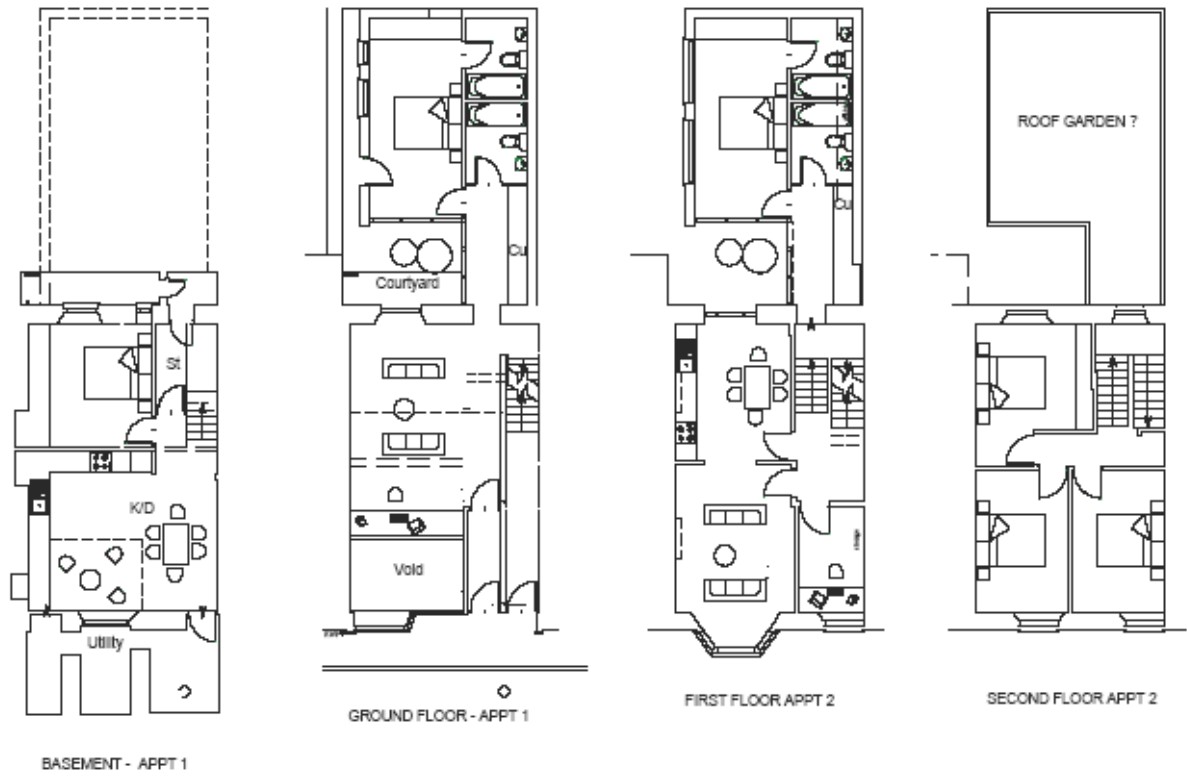
Croft Court penthouse flats. On stop due to affordable housing policy



House in West Williamston. Obvious infill site. Refused due to affordable housing & transport policies,



Ocean Commotion chapel. 4 flats on stop due to affordable housing policy



Squibbs studios. 3 flats on stop due to affordable housing policy