PEMBROKESHIRE REPLACEMENT LOCAL DEVELOPMENT PLAN
EXAMINATION IN PUBLIC STAGE

HEARING SESSION 2

STATEMENT OF OBJECTION

POLICY GN17 – RESIDENTIAL COMMITMENTS

On behalf of
Evans Banks Planning Ltd

Our Ref: EBP1/PLDP2
Participant Reference.: 4197/1966
Date: October 2024
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1.0 INTRODUCTION

1.1 This Statement has been prepared by Evans Banks Planning Ltd on behalf of its Clients as a continued objection to the provisions of Policy GN17 (*Residential Commitments*) as part of the *Pembrokeshire Local Development Plan* (LDP) 2. This Statement has been prepared in advance of our attendance of the relevant session of the Examination in Public and has been prepared in response to the Inspector's issued '*Schedule of Matters, Issues and Questions'* document. The contents of this Statement should also be read in conjunction with the originally made points of objection submitted at the Deposit 2 stage, which still stand.

1.2 In addition to the above, this Statement provides additional commentary in response to the following question raised by the Inspector:

2d. Are the estimated yields from committed and windfall sites, in particular small windfall sites in local villages and the countryside, realistic and based on robust evidence? Has a non-delivery allowance been defined and applied appropriately?

2.0 HOUSING SUPPLY – RESIDENTIAL COMMITMENTS

2.1 THE DEVELOPMENT PLANS MANUAL (DPM)

2.1.1 Table 18 of the DPM provides guidance on the various elements of provision that can be relied on in meeting a Council's housing land supply requirements during the lifetime of its LDP. Aside from new allocations and windfall sites, the DPM also advises that 'commitments' and 'rollover sites' could also be counted towards meeting the supply requirements during a Plan's lifetime.

2.1.2 In the case of 'commitments' (often also referred to as the Land Bank), the DPM advises that "*those sites with a planning permission at the base date*" of the Plan are regarded as 'commitments'. The DPM also advises that "*Including the entire land bank in numerical terms in a housing provision can be a high risk strategy. If sites do not come forward as anticipated, or issues arise as part of the examination process, a lack of delivery can result in a potential shortfall of homes. Having a non-delivery allowance in the plan can help avoid this scenario*.". A non-delivery allowance is then described as being where a proportion of the land bank is discounted with regards to its contribution to supply during the Plan period, with the level differing from Authority to Authority and expected to be based on local evidence.

2.2 PEMBROKESHIRE LDP

2.2.1 In the case of the LDP a significant proportion of the anticipated level of housing supply is expected by the Council to be delivered by 'commitments'. It is clear from the Councils submitted evidence and documentation that a degree of assessment of these sites and their potential contribution to the supply level during the Plan period has been undertaken, resulting in a number being 'discounted' in terms of the level of provision they are expected to provide.

2.2.2 Notwithstanding the above, we have concerns with regards to the continued reliance on historic under-performing sites and that a reliance on them to provide new homes

for the communities they form part of is extremely dangerous. As detailed in the Council's Housing Supply and Trajectory Paper (July 2024), a significant number of these commitments benefit from planning permissions dating over a decade previously, and yet, are nowhere near being completed. This is reflected again in the recently published document (ED13) in response to questions raised by the Inspector.

2.2.3 Particular concerns have been raised in relation to Commitment 003/00040 (North of New Road, Begelly) in our previous submissions, but such concerns are shared in relation to a number of other Commitments, including Commitment 088/00074 (Dingle Farm, Narberth), Commitment 095/00147 (Land adjacent to Long Mains and Monton Priory, Pembroke) and Commitment 086/0037 (Land at Milford Marina, Milford Haven).

2.2.4 In some instances, extant consents on the above sites go as far back as 2011, and whilst some have seen a modest level of activity, the majority remain undeveloped. It is perhaps unsurprising that in each case, their 'allocation' in terms of anticipated provision within the Plan period has been heavily discounted due to long periods of inactivity, but what is more interesting is that all 'proposed' units have been assigned within the latter phase of the Plan's lifetime. This demonstrates that even the Council has significant concerns as to whether or not any further units will be delivered on these sites within the Plan's lifetime.

2.2.5 On the basis of the above evidence, and indeed doubt, we would respectfully put it to the Inspector that the estimated yields from committed sites are not realistic, and when the evidence is considered in full on a case-by-case basis, it is clear that non-delivery allowance applied to the respective sites is not appropriate.

3.0 TESTS OF SOUNDNESS

3.1.1 In summary, on the basis of the evidence submitted in and with this Statement, as well as that already submitted to the Council, it is clear that Policy GN 17 (residential Commitments) as it stands fails to adhere to the following Tests of Soundness, as required by the *Development Plan Manual*:

- Does the Plan fit?
- Is the Plan appropriate?
- Will the Plan deliver?

3.1.2 It is quite clear that the inclusion of a number of 'committed sites' as part of the overall anticipated housing supply figure for the Plan period is not consistent with the guidance and requirements of national planning policy (particularly *Planning Policy Wales*), and their inclusion will clearly, yet again, result in the development plan failing to provide a sufficient level of housing to meet its communities needs.

3.1.3 As a result, the continued inclusion of a number of the 'commitments' in question would result in the *Pembrokeshire Local Development Plan 2* being unsound and alternative sites such as those promoted on behalf of our Clients should in turn be allocated and included within the Plan, in order to rectify the situation.