

Adroddiad ar Gyd- astudiaeth Argaeledd Tir ar gyfer Tai

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Swyddog o'r Arolygiaeth Gynllunio

Dyddiad: 13/10/15

Joint Housing Land Availability Study Report

by I Gwilym BSc MSc

an officer of the Planning Inspectorate

Date: 13/10/15

Ref: JHLAS/15/ N6845/516136

Local Planning Authority: Pembrokeshire County Council

- This report concerns the Pembrokeshire County Council Joint Housing Land Availability Study (JHLAS) 2015.
 - The matters in dispute are set out in the JHLAS Statement of Common Ground (SoCG) submitted to the Welsh Government in August 2015 (and the subsequent emails from Study Group members).
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Recommendation to the Welsh Ministers

1. That the 2015 JHLAS housing land supply figure for the Pembrokeshire County Council area be determined as 5.0 years.

Context of the Recommendation

2. Local Planning Authorities have a duty to ensure that sufficient land is genuinely available or will become available to provide a 5-year supply of land for housing¹. The purpose of preparing a JHLAS is to:
 - Monitor the provision of market and affordable housing; and
 - Provide an agreed statement of residential land availability for development management purposes and for inclusion in the Annual Monitoring Report for the relevant Local Development Plan.
3. The Local Planning Authority and Study Group have not reached agreement on all matters and have prepared a Statement of Common Ground (SoCG) in accordance with TAN 1 'Joint Housing Land Availability Studies' (2015).
4. The purpose of this report is to recommend an appropriate housing land supply figure to the Welsh Ministers in respect of the Pembrokeshire County Council area, in the light of the matters in dispute concerning the calculation of such a figure and the available evidence. The report has been prepared in line with section 7.6 of TAN 1 by an officer of the Planning Inspectorate.

Main Issue

5. The SoCG confirms that there are 5 sites in dispute. The main issue is whether each of the units in dispute should count towards the five year housing land supply.

¹ PPW Edition 7 paragraph 9.2.3

Reasons

6. For all 5 disputed sites, the Home Builders Federation (HBF) considers that all units should be moved to category 4 as they have been in the 5 year land supply for over 5 years (in accordance with guidance in TAN1). The Council contends that as the sites are allocated in the Pembrokeshire Local Development Plan (LDP), and their deliverability was considered in respect of their allocation during the LDP examination, the clock should be reset for their inclusion in the 5 year land supply from the date of adoption of the LDP (February 2013).
7. I note that the Welsh Government (in their email from 3 August 2015) has indicated agreement in principle to this approach. I agree that the allocation of a site in a recently-adopted LDP is an important consideration in terms of determining whether it should form part of the 5 year land supply in a JHLAS. However, the TAN is clear that the specific circumstances pertaining to each site need to be considered when determining its deliverability.
8. To be allocated in an LDP, a site must be shown to be deliverable within the plan period. Whether or not it is deliverable within a 5 year period is a different matter. Paragraph 2.4 of the TAN makes it clear that a JHLAS is a key mechanism for monitoring the effectiveness of the LDP. Consequently, deliverability within the JHLAS context needs to be considered separately from the LDP process.
9. I have therefore considered the 5 disputed sites on a site by site basis, in order to determine whether sufficient explanation has been provided as to why the sites should remain within the 5 year land supply, in line with paragraph 4.4.5 of TAN 1.
10. Opposite Woodholm Close (Site Ref 029/00014) (11 units in dispute): This site is allocated in the Pembrokeshire LDP for a minimum of 13 units and has been included in the 5 year land supply since 2001. No evidence has been provided of the developer's intentions at the site, but the site has full planning permission extant at the base date of this study, with the Reserved Matters application permitted in April 2013. Although I do not consider its status as an allocated site in the LDP is sufficient evidence in itself to resist the presumption to reclassify the site under para 4.4.5 of TAN1, I consider that the extant planning permission in combination with the allocation is sufficient explanation to justify the continued inclusion of this site in the land supply. Consequently I find that all 11 units should be included in the 5 year land supply.
11. South of Cleggars Park (052/00011) (55 units in dispute): This site is allocated in the Pembrokeshire LDP for a minimum of 55 units. It has been included in the 5 year land supply since 1999. There is no planning permission for the site, and no evidence of developer interest has been provided. I do not consider that sufficient explanation has been given, nor clear evidence provided, to justify the continued inclusion of this site in the land supply, as is required by paragraph 4.4.5 of the TAN. Consequently I find that all 55 units should be removed from the 5 year land supply.
12. Hubberston West of Silverstream (086/00095) (30 units in dispute): This site is allocated in the Pembrokeshire LDP for a minimum of 50 units. It has been included in the 5 year land supply since 2007. There is no planning permission for the site, and no evidence of developer interest. I do not consider that sufficient explanation has been given, nor clear evidence provided, to justify the continued inclusion of this site in the land supply, as is required by paragraph 4.4.5 of the TAN. Consequently I find that all 30 units should be removed from the 5 year land supply.

13. Steynton Beaconing Field (086/00129) (30 units in dispute): This site is allocated in the Pembrokeshire LDP for a minimum of 149 units. It has been included in the 5 year land supply since 2001. There is no live planning permission for the site, but there were pre-application discussions with an interested developer in December 2013. While this represents some level of interest in the site, no evidence has been provided that a planning application is likely to be made soon. I do not consider that the pre-application discussions by themselves are sufficient reason to justify the continued inclusion of this site. All 30 units should be removed from the 5 year land supply.
14. East of Hill Farm, Imble Lane (096/00233) (43 units in dispute): This site is allocated in the Pembrokeshire LDP for a minimum of 63 units. It has been included in the 5 year land supply since 1999. There is no planning permission for the site, and no evidence of developer interest has been submitted. I do not consider that sufficient explanation has been given, nor clear evidence provided, to justify the continued inclusion of this site in the land supply, as is required by paragraph 4.4.5 of the TAN. Consequently I find that all 43 units should be removed from the 5 year land supply.
15. For the above reasons, I find that the total number of units in the five year land supply is 3,406.

Conclusion

16. Based on the foregoing analysis I recommend that the five year housing land supply for the Pembrokeshire County Council planning area as at 1 April 2015 is 5.0 years, calculated to one decimal place (in accordance with paragraph 7.6.1 of TAN 1).

Ifan Gwilym

Planning Officer