



2<sup>nd</sup> July 2013

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Chair  
Communities, Equality and Local  
Government Committee  
National Assembly for Wales  
Cardiff Bay  
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*Croesawn ohebiaeth  
yn Gymraeg a Saesneg*  
*We welcome correspondence  
in English and Welsh*

Dear Chair

### **Inquiry into barriers to home building in Wales**

Thank you for the opportunity to submit views on the above subject on behalf of the Pembrokeshire Coast National Park Authority.

The comments on barriers to home building set out below are made within the context of a key priority for this National Park Authority being the delivery of affordable housing. The most credible population projection for this National Park suggests there is no justification for general market housing development in the National Park to house an increasing population. Any general housing market releases made are to support the delivery of affordable housing in the National Park.

The main barriers for this Authority are:

- The effects of the economic downturn, including the lack of access to development or mortgage finance
- Long term reductions to Social Housing Grant
- Acceptable Costs Guidance
- A perception of restrictive planning policies
- The absence of mainstream developers who have a better understanding of the planning system.
- The cost of achieving higher sustainable design standards including sprinkler systems.

Some of these issues require further explanation. More comment is provided below.



**Landowners are reluctant to sell.** The economic downturn and credit crunch have exacerbated barriers to the delivery of affordable housing in rural areas despite falling land and house prices. It is common for landowners to be reluctant to sell and for sites to be mothballed.

**Affordable housing delivery** has not been given priority by the local authority as land owner given the wish to ensure Best Value in the disposal of sites. At the time the Authority's Local Development Plan adoption the local authority owned circa 44% of the land allocated in the Pembrokeshire Coast National Park Local Development Plan. This would provide for a total of 316 dwellings 187 of which would be affordable dwellings.

**Quick wins:** Political leadership at a national level prioritising the need to deliver affordable housing on publicly owned land.

The Welsh Government should enable local authorities to commence programmes of social housing construction on land the local authority owns.

**A perception of restrictive planning policies:** This Authority is currently undergoing a Scrutiny Committee Review of affordable housing and one of the views is that developers and landowners see high percentage affordable housing requirements and therefore do not approach the authority to negotiate.

**Quick win:** One of the likely recommendations of the Scrutiny Committee Review is for the Authority to proactively engage with developers and landowners on the likely affordable housing requirements for each of the allocations and on the Authority's willingness to negotiate to ensure developments are viability.

**Acceptable Cost Guidelines for Rural/National Park Areas:** The view of local housing associations is that in National Park locations given the cost of land, the cost of acceptable design solutions and the issue of not achieving sufficient economies of scale they are more likely to achieve 'more bang for their buck' outside the National Park. Therefore building programmes within this National Park have been much reduced.

**Quick wins:** Welsh Government to reconsider whether the acceptable cost guideline model disadvantages bringing forward affordable housing in rural areas/National Parks.

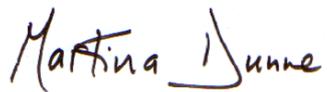
The Authority intends to:

- Highlight reference to the Welsh Government's current policy that schemes with costs exceeding Acceptable Cost Guidelines may be approved if high acquisition and /or works costs are justified in light of local conditions). Costs over 120% will not be met by the Welsh Government.

- Highlight its willingness to negotiate on less costly solutions but solutions that are equally suitable in design terms and to provide practical examples of this.

I would be able to submit the finding of the scrutiny committee when available which may also be of use to the Inquiry.

Yours faithfully

A handwritten signature in black ink that reads "Martina Dunne". The signature is written in a cursive style with a large, stylized 'D'.

Martina Dunne

**Head of Park Direction**

**Pembrokeshire Coast National Park Authority**