

# **Background Paper Principal Residence and/or local Connections Policy**

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**August 2019**

**Pembrokeshire Coast National Park Authority**

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## Summary

1. The purpose of this paper is to consider the appropriateness of applying a principal residency or a local occupancy policy for the Pembrokeshire Coast National Park.
2. The paper in summary:
  - **Chapter 1:** Reviews national planning policy to understand if there has been a change in approach. The paper concludes that there has been no change in the national planning policy context since 2003 in terms of how such policies need to justify themselves with robust evidence for the application in specific locations.
  - **Chapter 2:** Summarises the geographical coverage, the mix and size of housing proposed, the nature of the occupancy control and whether conditions or planning obligations are used. The paper looks at policy approaches in Gwynedd and Anglesey and Swansea along with the St Ives Neighbourhood Plan.
  - **Chapter 3:** The Paper considers the objectives that these Plans seek to achieve and the evidence base used to justify the Plans' policies. Indicators suitable to this National Park are also considered. The conclusions that can be drawn are that:
    - There is a mosaic of communities across Pembrokeshire that reach some of the thresholds used by others in evidencing policies. There is not a consistent pattern of issues that are attributable to one or a group of communities.
    - The communities identified lie either wholly inside, partly inside and sometimes completely outside the National Park which would have implications for Pembrokeshire County Council as planning authority.
    - Analysis of education, retail and community facilities do not show a pattern of overall decline in the National Park which is used as part of the rationale for proposing these types of policies elsewhere.
    - Where an issue is highlighted within communities, the use of standalone occupancy controls on new build development is not considered to be the logical response.
  - **Chapter 4:** Considers the effect of such controls in practice by comparing the occupancy of social housing, intermediate housing, local occupancy controlled housing and principal residency controls. It can be concluded that:
    - Depending on the location researched, local residency occupancy controls reduce the price of housing by between 15% and 30%. Some authorities are more cautious about providing definite percentage reductions.

- The difference between these alternative models and a low cost home ownership model is questioned. The low cost home ownership model referred to in this Authority's current Supplementary Planning Guidance on Affordable Housing advises that the cost will typically capped at a maximum of 70% of their open market value. Paragraph 2.16 page 4 and 5 **NPA065**.
  - Social rented, intermediate rent, low cost home ownership and local residency occupancy controls would all, by use of those controls, mean that properties are occupied frequently.
  - Principal residency controls, if the St Ives example is used, raises questions about the potential frequency of occupancy with the occupier being able to work away from home during the week. Finally, the Authority remains concerned about the ability to negotiate affordable housing where no unfettered, open market housing is being provided.
- **Chapter 5:** Considers viability issues when applying such approaches in this National Park to a 30 hectare development as per the Development Appraisal Toolkit. It is assumed that the 30 dwellings would have an occupancy control imposed. The conclusions are:
  - At a 30% reduction in market values all of the sub-market areas can no longer meet the Land Value Benchmark (LVB), with the exception of Tenby. This means that in these areas the policy position for the proportion of affordable housing expected would need to be reduced. In some areas, affordable housing may no longer be viable at all.
  - In the best case scenario the top three, highest value, areas are still yielding residual values greater than their respective Land Value Benchmarks. All other sub-market areas do not.
  - Despite the fact that the Newport sub-market area has slightly higher market values than Tenby it fails to meet LVB with a 30% reduction in market value. This is due to the fact that it is in a lower Acceptable Cost Guidelines (ACG) band than Tenby so the revenue from constructing affordable housing for the developer is lower in Newport i.e. 42% of a higher ACG value.
- **Chapter 6:** Reviews the relevance of the conclusions reached when the Authority considered pursuing a local occupancy policy for the Joint Unitary Development Plan adopted in 2006 for today. The conclusions reached are:
  - The supporting evidence for such policies, when considered for this National Park, is not robust enough to justify introducing additional occupancy controls through the Local Development Plan.

- Geographically communities lie both inside and partly inside the National Park. Any policy response to issues needs collaborative working with the relevant authorities and associations.
  - **Chapter 7:** Considers the sustainability credentials for such policies. The conclusion reached for the Anglesey and Gwynedd Plan and the Swansea Plan is that there is little detail on the sustainability appraisal available. The appraisal and soundness tests conclusions for a principal residency policy in this National Park did support pursuing such an approach **NPA057**.
  - **Chapter 8:** Focuses on known impacts of policies in practice in Wales and three English National Parks. In conclusion (for the Yorkshire Dales, North York Moors and the Lake District):
    - As a result of the imposition of the occupancy control figures property values are reduced ranging from a 15% to 30% reduction. There was a degree of uncertainty with this as price controls are not inbuilt in the control mechanisms.
    - Regarding properties completed the number with occupancy controls are a small number relative to overall completions (except for the Lake District) or the overall housing stock in the National Park.
    - Comments are provided regarding mortgage issues, including mortgagee in possession clauses, expectations regarding what a property will sell for, the need to focus on a small number of properties on a site and difficulties in selling.
    - Policies in the English National Park areas have more historical data to refer to in terms of completions and the impact on house prices of the properties with the occupancy control. Evidence of impacts on the housing market generally is not that easy to locate.
    - Policies in Cornwall and Wales have not had time to bed in for us to understand the impacts.
  - **Chapter 9:** Considers the potential for unintended consequences. Concerns regarding potential adverse impacts on the wider housing market, affordable housing delivery, along with questions as to whether the objectives of sustaining communities can be achieved are raised. Enforcement and compliance is also an issue.
3. The paper concludes that such a policy approach is not appropriate for this National Park.





## **Chapter 2 Summary of policies applied elsewhere**

10. The Authority is aware of local occupancy policies in operation in England and Wales. The focus here is in terms of those in Wales (Anglesey/Gwynedd and Swansea) as they are relevant to the Welsh planning system and the evidence required to justify them, and the Principal Residence Policy in St Ives.
11. A summary table has been prepared below to provide a snapshot of each of the above policies in terms of:
  - Geographical coverage
  - Mix of housing allowed where applied
  - Size of houses – control of
  - Text of occupancy control
  - Condition or obligation

**Table 1 Summary of Principal Residence / Local Connections Policies**

Location	Geographical Coverage	Mix of housing allowed	Size of houses (control of market units)	Text of occupancy control	Condition or obligation	
Anglesey and Gwynedd (Policy TAI 5 – Local Market Housing)	Abersoch <sup>3</sup>	100% local occupancy	<b>Type of residential unit</b>	<b>Local Market Housing</b>	<p><b>Local Service Centres –</b> connection with the ward where the settlement is located or any ward directly adjoining it.</p> <p><b>Local, Rural/Coastal Villages –</b> connection with the ward where the settlement is located only.</p> <p>‘Connection with the ward’ defined as follows:</p> <p>i) an individual who currently lives within the relevant ward and who has lived there continuously for 5 years or longer; or</p> <p>ii) people who are not currently living in the relevant ward but who have a long and established connection with the local community, including having lived in the area for</p>	<p>Planning condition is used to control the occupancy of a house to households that have a specific local connection but a mechanism is not used to control the price of the house. Occupancy is restricted in the first place and in perpetuity to those who conform to the relevant occupancy definition.</p> <p>When a development is permitted a planning condition will be used to manage Permitted Development Rights to ensure that an extension or alterations would not increase the size of the property beyond the defined accepted maximum size.</p>
	Beaumaris		Single storey, 2 bedroom house	90m <sup>2</sup>		
	Rhosneigr		Single storey, 3 bedroom house	100m <sup>2</sup>		
	Aberdaron		Single storey, 4 bedroom house	120m <sup>2</sup>		
	Borth-y-Gest		Two storey or more, 2 bedroom house	100m <sup>2</sup>		
	Moelfre		Two storey or more, 3 bedroom house	110m <sup>2</sup>		
	Morfa Bychan		Two storey or more, 4 bedroom house	130m <sup>2</sup>		
	Mynytho		Two storey or more, 5 bedroom house	145m <sup>2</sup>		
	Llanbedrog		Garage	Additional 20m <sup>2</sup>		
	Llangian		Where there is no connection with a RSL or where the development is not subject to a Social Housing Grant from the Welsh Government.			
	Rhoshirwaun					
	Sarn Bach					
	Trearddur					
	Tudweiliog					
Four Mile Bridge						
	(see below for colour coding)					

<sup>3</sup> Colour coding allows the reader to see where in the spatial hierarchy the settlement sits. See lower down in the Geographical Coverage column.

Location	Geographical Coverage	Mix of housing allowed	Size of houses (control of market units)	Text of occupancy control	Condition or obligation
	Settlement Hierarchy for Plan area: i) Sub regional centre ii) Urban Service Centre iii) Local Service Centre iv) Villages v) Clusters			a period of 5 years or longer in the past; or  iii) people who have an essential need to move to live close to relatives who are currently living in the relevant ward and who have lived there for at least the past 5 years or longer and who need support because of age or infirmity reasons; or  iv) people who need support because of reasons relating to age or infirmity and who need to move to live close to relatives who are currently living in the relevant ward and who have lived there for the past 5 years or longer.	
Swansea (Policy H5 – Local Needs Housing Exception Sites)	Bishopston Fairwood Gower Mayals Newton	A minimum of 51% (the majority proportion) Affordable Housing for Local needs; and  A maximum of 49% (the minority proportion) enabling	<b>A Range of House Types:</b> Provision of a range of house types, including for example flats and bungalows, will contribute to diversification of local stock and provide opportunities for certain population cohorts such as older persons, those requiring care and	The occupancy of the Local Needs Market Housing will be restricted to “persons with a local connection” to be used as “their only or principal home” and will be formally tied to planning consent by means of legal	Occupation of dwelling will be controlled through the use of local occupancy restrictions. Such restrictions will require that initial and subsequent occupants of the properties fall within the definitions of

Location	Geographical Coverage	Mix of housing allowed	Size of houses (control of market units)	Text of occupancy control	Condition or obligation
	<p>Oystermouth</p> <p>Pennard</p> <p>Penclawdd</p> <p>West Cross – all fall within the Gower, Gower Fringe and West Swansea Strategic Housing Policy Zones.</p> <p>Local Needs Housing Exception Sites:</p> <p><b>H5.1:</b> Land at Monksland Road, Scurlage</p> <p><b>H5.2:</b> Land to the east of Gowerton Road, Three Crosses</p> <p><b>H5.3:</b> Land adjoining Tirmynydd Road, Three Crosses</p> <p><b>H5.4:</b> Land adjoining Pennard Drive, Pennard</p> <p><b>H5.5:</b> Land at Summerland Lane,</p>	<p>Local Needs Market Housing that meets an identified housing need within the Locality by providing an appropriate range of dwelling sizes, types and design specifications having regard to evidence of viability.</p>	<p>newly forming households to access appropriate housing within the Locality.</p> <p><b>A Range of Design Specifications:</b> Provision of stock that meets design standards such as Lifetime Homes standards, the provision of lifts within flats, level access to dwellings, and other measures, which would serve to increase opportunities for older households or those requiring care, to continue to live independently within the local area.</p> <p><b>A Range of Sizes:</b> Addressing the lack of smaller properties in wards within the Locality will increase opportunities for newly forming households, thus reducing the number of young people and young families moving out of the area to find housing or remaining in concealed households not able to form independent households. Ensuring the diversification of sizes of stock in the local housing market will also aid older people to move out of existing family housing into more suitable properties and thus facilitate churn in the local housing</p>	<p>agreements and/or conditions.</p> <p><b>Person with a Local Connection</b> means an individual who before taking up occupation of the dwelling satisfies one of the following conditions:</p> <p>a) The person has been in continuous employment in the Locality defined for at least the last 9 months and for a minimum of 16 hours per week immediately prior to occupation: or</p> <p>b) The person needs to live in the Locality defined because they need substantial care from a relative who lives in the Locality defined, or because they need to provide substantial care to a relative who lives in the Locality defined. Substantial care means that identified as required by a medical doctor or relevant statutory support agency; or</p> <p>c) The person has been</p>	<p>“persons with a local connection”. Restrictions will also be imposed to ensure that the dwellings provided are only occupied as “only or principal homes”.</p> <p>Proposals that do not provide an appropriate number and range of dwellings to meet the identified social and/or economic needs of “persons with a local connection” within the Locality will not be permitted.</p> <p>Agreements / Conditions will seek to enforce that:</p> <p>1) The dwelling-houses identified as ‘local needs housing’ shall not be occupied other than by a <b>person with a local connection</b> or the widow or widower of such a person and any dependents of such a person living with him or her, unless the property</p>

Location	Geographical Coverage	Mix of housing allowed	Size of houses (control of market units)	Text of occupancy control	Condition or obligation
	<p>Newton</p> <p><b>H5.6 Land at Higher Lane, Langland</b></p> <p>(see below for colour coding)</p> <p>Settlement Hierarchy for Plan area:</p> <p>i) Urban area</p> <p>ii) <b>Key villages</b></p> <p>iii) Countryside</p>		market.	<p>continuously resident in the Locality defined for three years immediately prior to the occupation of the dwelling and is in need of another dwelling resulting from changes to their household (including, but not limited to, getting married, divorced, having children, requiring more space for a growing family, downsizing to a more manageable home or adult children forming new households and purchasing a property for the first time, or where a person is returning to the Locality defined within 12 months of the completion of undertaking full time post-secondary education or skills training).</p> <p><b>The Locality</b> is defined as the Council's administrative wards of Bishopston, Fairwood, Gower, Mayals, Newton, Oystermouth, Pennard, Penclawdd and West Cross.</p>	<p>has been marketed for sale for a period of at least 16 weeks at market value price and at the end of the 16 week period a person with a local connection has not been identified as a purchaser. This will be required to be enforced for every successor in title (repeat sale) to each individual dwelling.</p> <p>If after a period of 16 weeks of marketing of a local needs dwelling at an estate agents in the Locality and advertising on a well-used property agency website, there are no appropriate offers of purchase from a person with a local connection, the property may be marketed to, and subsequently purchased by, a person that does not meet the local need criteria. Any subsequent re-sale of the local needs dwelling will be subject to the local needs occupancy restriction in order to ensure that the property will continue to provide a</p>

Location	Geographical Coverage	Mix of housing allowed	Size of houses (control of market units)	Text of occupancy control	Condition or obligation
				<p>An <b>Only or Principal Home</b>' is a dwelling house that is occupied continuously for a minimum period of six months in every twelve month period. For the avoidance of doubt the dwelling shall not be occupied as a holiday home, second home or for short term let accommodation.</p>	<p>potential opportunity to address any future local need in the Locality.</p> <p>2) The obligations shall not be binding or enforceable against any mortgagee or chargee or any receiver appointed by such a mortgagee or chargee or any person deriving title through such a mortgagee, chargee or receiver provided always that a successor in title of such a person will be bound by the obligations.</p> <p>3) The dwelling-houses identified as 'local needs housing' shall only be occupied by a person as his or her <b>Only or Principal Home</b>. The occupant will be required to supply to the Local Planning Authority (within 14 days of the Local Planning Authorities written request to do so) such information as the Authority may reasonably require in order to determine whether</p>

Location	Geographical Coverage	Mix of housing allowed	Size of houses (control of market units)	Text of occupancy control	Condition or obligation
					this is being observed.
<p>Cornwall - St. Ives Area Neighbourhood Development Plan</p> <p>(Policy H2 – Principal Residence Requirement)</p>	<p>St. Ives and Carbis Bay</p>	<p>100% Principal Residence occupancy on new open market housing, excluding replacement dwellings</p>	<p>No information provided in NDP.</p>	<p>Full time principal residence – housing which has to be used as the principal residence of the household living in it, but without price controls or any local connection requirement. Principal residence housing should only be supported in order to provide cross subsidy for affordable housing or other development directly benefitting the community.</p>	<p>The condition or obligation on new open market homes will require that they are occupied only as the primary (principal) residence of those persons entitled to occupy them. Occupiers of homes with a Principal Residence condition will be required to keep proof that they are meeting the obligation or condition, and be obliged to provide this proof if / when Cornwall Council requests this information. Proof of Principal is via verifiable evidence which could include, for example (but not limited to) residents being registered on the local electoral register and being registered for and attending local services (such as healthcare, schools etc.)</p>

## Gwynedd and Anglesey Joint Local Development Plan adopted 31 July 2017

### Objectives:

12. The objectives of the Plan in relation to its local connection policy are summarised in the Authorities' supplementary planning guidance on 'Local Market Housing'.<sup>4</sup>

*'The Joint Local Development Plan has identified a range of main issues that the Plan needs to address. These include the following:*

- *KI 2 - Impact of holiday / second homes on communities and the housing market*
- *KI 5 – Losing young residents who are economically active*
- *KI 6 - Insufficient supply of housing and responding to the need for a better range of housing in terms of location, type, size and affordability for local people*

*3.6 The Vision of the Plan also refers to developing the area to be an area "where the housing needs of local communities in the area are better addressed in terms of supply, type, quality, energy efficiency, location and affordability". In this respect, one of the objectives of the Plan notes the following:*

*SO16 – To provide a mixture of good quality housing units, of a range of types and tenures to meet the housing requirements of all sections of the population.*

*3.7 Therefore, the purpose of Policy TAI 5 is to tackle imbalance within specific housing markets within the Plan area and to maintain and strengthen vulnerable communities. It responds to recognised factors that influence the relevant housing markets. It aims to expand opportunities within housing markets where there are severe problems and ensure a provision of units that meet the community's needs. The Policy's objective is to ensure the social sustainability of communities, specifically vulnerable communities, where severe problems exist within the housing market. As a result, it is believed that it will create substantial social and economic benefit in these communities. It could also assist to achieve broader social policy aim, such as maintaining or strengthening Welsh language communities.*

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<sup>4</sup> [Supplementary Planning Guidance – Local Market Housing \(March 2019\), Anglesey & Gwynedd Joint Local Development Plan](#)

3.8 This Policy is based on paragraph 4.2.9 of Planning Policy Wales (Edition 10, December 2018) which states:

*“Planning authorities, in partnership with the community, including the private sector, must develop policies to meet the challenges and particular circumstances evident in their areas. If these policies need to diverge from national policies in order to meet specific local housing needs for market housing, which normally would have no occupancy restriction, planning authorities must provide clear and robust evidence to support the approach taken”.*

3.9 This Policy is therefore only relevant to specific locations where there is specific and intensive pressure within the local housing market. On this basis, the Plan aims to promote the right type of housing units within the areas that face the greatest challenges in order to assist with counteracting the trends of the past. It is important to do this in order to conform with the Plan's aims and vision to maintain or create sustainable communities. The Plan promotes two types of housing in the settlements named in Policy TAI 5, namely affordable housing and local market housing.’

#### Indicators

13. Indicators were used to investigate and then define areas where local needs market housing is needed. A range of indicators were applied to all of the Plan area assessing:

- Affordability – the ratio between median house prices and median household incomes (threshold – ratio of 10.0);
- Lower quartile ratio – ratio between lower quartile house prices and lower quartile household incomes (threshold – ratio over 15.0);
- Percentage of people priced out of the housing market – percentage of households that have an income below 3.5 times the lower quartile house price (threshold 80% of households);
- Second homes – number of second homes in the area (threshold – more than 25%);
- Migration – number of residents born outside Wales (threshold – over 60%);
- Link between house prices and quality of the environment – (threshold - a score of 1750 or more according to the Welsh Index of Multiple Deprivation);
- Council Tax bands – percentage of houses in highest bands (threshold – more than 10%);
- Number of house sales (threshold – 12 or fewer); and
- Percentage of empty places in schools – (no specific threshold).

14. Each of the results was scored – the highest or worst figure in each case being scored 100 and the rest worked out as a ratio of that score.

15. All of the information was mapped on a series of maps and the ‘worse-case’ areas selected.
16. Each of the indicators in those selected areas was weighted – the number of second homes and migration were given the highest weightings. The results were considered with and without the weightings.
17. On the basis of this exercise 9 wards were considered appropriate for a local residence policy approach.
18. More detail on the indicators is provided in Appendix 1:

## Cornwall County Council/St Ives Neighbourhood Plan

### Objectives

19. ‘The St Ives Area NDP makes it clear that the aim of Policy H2: Full-time Principal Residence Housing, is not simply to ensure that people who wish to live in the area as full-time residents are able to obtain housing, but crucially to safeguard the sustainability of development by reducing the proportion of dwellings that are not used as a principal residence. The purpose of this is to support a sustainable community.
20. ‘Objective: To safeguard the sustainability of the settlements in the St Ives NDP area, whose communities are being eroded through the amount of properties that are not occupied on a permanent basis.’<sup>5</sup>

### Indicators

21. When considering the Local Plan the evidence base focused on:
  - Cornwall has a high proportion of second homes – 11.2% county-wide
  - Five parishes in the county have more than 35% of housing stock as second homes;
  - Second home ownership is commensurate with high property value areas and has the effect of increasing house prices further (second home owners tend to be more affluent);
  - The Council was directed by the Local Plan Inspector to meet ongoing need for second homes by increasing the housing land supply by 7%.
22. St Ives parish prepared a Neighbourhood Development Plan within the context of the Local Plan. Although it was not one of the 5 parishes cited in the Local Plan as having over 35% second homes, the 2011 Census showed that the towns of St Ives and Carbis are in the top 5 settlements in Cornwall with the highest proportion of second homes and holiday lets (25%).

<sup>5</sup> <https://www.cornwall.gov.uk/media/31070036/principal-residence-policies.pdf>

23. The policy to require all new houses in the St Ives Parish to be principal residence was established through community consultation as part of the Neighbourhood Development Plan.

24. Between 2001 and 2011:

- The number of dwellings in the NDP area not occupied by a resident household rose by 67%
- Housing stock grew by 684
- The resident population grew by 270 (2.4%)
- The number of resident households grew by 6%

25. The policy is applicable to all new (non-replacement) dwellings in the Neighbourhood Development Plan area.

## City and County of Swansea Local Development Plan February 2019

### Objectives

26. Rural areas are identified on the basis of usual characteristics. The need for a different approach arose from the non-delivery of any affordable housing across the rural area using an exception policy to deliver 100% affordable housing.

27. The 3 rural areas are:

- West Swansea
- Gower Fringe
- Gower

### Indicators

28. The Local Housing Market Assessment identified high levels of need of affordable housing in each of these areas. It also highlighted the need to address:

- Particular accommodation types;
- Needs of specific local groups:
  - First time buyers
  - Local persons creating new households
  - Carers or those requiring care
  - Older people

29. Evidence was collected on a ward level for each of these areas based on:

- Population
- Population density

- Age profile
  - Birth and death rates
  - Educational attainment
  - Health problems/disabilities
30. The results are mixed but generally show the wards to be inhabited by older people. As a result, death rates are usually higher than the Swansea average and birth rates lower. Greater numbers of people in these wards have higher level qualifications than average which would also link to affordability.
31. Swansea City Council considered that given the size and location of the sites most suitable for development in the rural and rural fringe areas, a mix of market and affordable tenures would best achieve sustainable communities. The sites range in size from 15 to 60 units but are large in relation to the rural settlements and settings in which they are located. The total number of units allocated under this policy is 1.2% of the entire housing provision of Swansea's Plan. The allocation of entire allocated sites for 100% affordable housing for local needs would result in an imbalance and not a socially mixed community.
32. Policy H5 of the Local Development Plan allocates 6 housing sites across The Gower which are termed 'local needs housing exception sites'. They must have a minimum of 51% affordable housing for local needs and a maximum of 49% termed as 'enabling local needs market housing that meets an identified housing need within the locality by providing an appropriate range of dwelling sizes, types and design specifications having regard to evidence of financial viability. The occupancy of the local needs market housing will be restricted to 'persons with a local connection' to be used as 'their only or principal home'.
33. The areas were also assessed on the basis of social and economic housing need:
- West Swansea – need for 1500 new dwellings with the majority needing to be affordable homes;
  - Gower Fringe – need for 300 new dwellings with a very high requirement for affordable homes;
  - Gower – need for 200 new dwellings with nearly all being affordable homes.

### **Chapter 3 Evidence used elsewhere – Relevance for Pembrokeshire Coast National Park**

34. Appendix 2 'Approaches elsewhere and data for Pembrokeshire' to this paper assesses evidence used by other authorities to justify such policies and how applicable this would be to the Pembrokeshire Coast National Park. As the National Park is a landscape designation many communities lie partly within two planning authority areas. They also lie within wider catchment areas, for example education, where local authority policies apply.

35. The Authority has analysed 15 Indicators summarised below and shown in Table 2 below. More detail is provided in Appendix 2:

1. **Transactions:** This involves looking at whether there is a churn of property in the market (used in Anglesey's and Gwynedd's evidence). Information is used for more than 1 year to take account of natural variance. 12 or fewer house sales in a ward in a period of 1 year is the threshold for selecting the most extreme areas in terms of this indicator. **3 communities** selected in Pembrokeshire.
2. **Affordability of Housing A:** Highlighted in the table below are those communities that have a ratio of 10 or more when median wage is compared with median price. Communities within, partly within and outside the National Park are selected. **17 communities** were identified. Used in Anglesey's and Gwynedd's evidence.
3. **Affordability of Housing B:** Ratio of 25 Percentile House Price to 25 Percentile Gross Annual Salary – ratio between lower quartile house prices and lower quartile household incomes (threshold – ratio over 15.0) None selected – highest is 12 in Pembrokeshire. Used by Gwynedd and Anglesey.
4. **Environmental Quality:** Gwynedd and Anglesey have used Land Registry data and Welsh Index of Multiple Deprivation (WIMD) in their analysis of housing markets, looking at the average prices, number of transactions and the link between environmental quality (in WIMD) and house prices.

The Physical Environment Domain of WIMD concerns air quality, flood risk and proximity of industrial/waste disposal sites.

The physical environment is generally not an issue for Pembrokeshire and the National Park.

5. **Affordable housing need per year as a proportion of all households:** This indicator considered whether there were communities in Pembrokeshire where there was an unusually high level of affordable housing need as a proportion of total households. No communities were selected.
  
6. **Affordable Housing Stock:** Swansea Council advises in its evidence background paper<sup>6</sup> that at the time of the 2011 Census, there was a much lower proportion of affordable housing in certain wards than the Swansea average (7.4% compared with 19.5%).

As a comparator the tables below show where communities have less than half the proportion of affordable housing than the Pembrokeshire average of 16%<sup>7</sup>.

**38 communities** were selected.

7. **Bedroom Size A:** Swansea Council has employed Census 2011 data on the number of bedrooms in households to show where there are low levels of households with one to two bedrooms and high levels of households with four or more bedrooms.

The communities highlighted were those that had twice the Swansea average of 4+ bedrooms.

In Pembrokeshire communities with twice the Pembrokeshire average for four or more bedrooms of 22% or more were selected. **2 communities** were selected.

And for 2 or fewer bedrooms the average for Swansea was compared by highlighting lower percentages in certain communities (i.e. for Swansea it was an estimated 33% of properties overall on average versus 25% or less highlighted for certain communities).

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<sup>6</sup> Page 18 Statement of Swansea Council arising from Hearing 4 March 2018

<sup>7</sup> Census 2011 Table: QS405EW - Tenure – Households (Pembrokeshire)

In Pembrokeshire communities with 20% of households with two bedrooms or fewer were highlighted. The average for Pembrokeshire was 25%. **17 communities** have been selected.

8. **Bedroom Size B:** see previous.
9. **No usual resident:** The 2011 Census defines a “household space” as accommodation used or available for use by an individual household. For the purposes of the Census household spaces are identified as having at least one usual resident or as having no usual resident.

Household spaces that have no usual resident are not simply vacant household spaces they can be vacant or used as a second home or holiday homes. Communities that have 25% or greater households with no usual resident were selected. (St Ives Neighbourhood Plan). **14 communities** have been selected.

10. **Council Tax Banding:** For Anglesey and Gwynedd the Council selected Council Tax bands where the percentage of houses in highest bands G,H,I (threshold – more than 10%). This was to identify affordability issues in the local housing market.

**10 communities** have been selected.

11. **Council Tax Second Homes:** Homes subject to 50% second homes council tax premium in Pembrokeshire were identified. Where 25% or more of properties were identified as second homes these were highlighted.

**3 communities** have been selected.

12. **Migration:** The Authority has considered the Census table which identifies the age group of migrants in the year before the Census. Tables comparing wards within or partly within the National Park and the whole of Pembrokeshire show a similar pattern but with older age groups being slightly more prominent for in migration. In outflows all age groups are slightly more prominent for the whole of Pembrokeshire. Further analysis at a community level has not been undertaken.

13. **Schools:** The Authority contacted the children and schools directorate at Pembrokeshire County Council and asked if there were any existing issues in the county, particularly those schools that have catchments within or partly within the National Park. No issues particular to the National Park were identified.
14. **Vacancy Rates in retail areas:** The average vacancy percentage for Great Britain is 11%.<sup>8</sup> The Pembrokeshire Coast National Park Authority Local Development Plan Annual Monitoring Report 2018 which details the vacancy rates of the National Park centres gives an average of 4.9% vacant units. A breakdown of vacant floor space percentage by centre is as follows, Newport 3.4%, Saundersfoot 1%, St. Davids 3.5%, Solva 0% and Tenby 8.5%.<sup>9</sup> No issues of concern have arisen for the communities of the National Park.
15. **Community Facilities:** In the updating of the evidence base for Local Development Plan 2, survey work was undertaken to update any changes in the availability of services and facilities in those settlements defined as 'Rural Centres' in Local Development Plan 1 and to assess other settlements that had not met previously met the threshold criteria to be defined as such. There have been changes with some settlements benefitting from additional facilities and services. Communities that showed a reduction are highlighted in the table below.

7 settlements have been selected.

36. The table below identifies where indicators or thresholds were reached.

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<sup>8</sup> Local Data Company Ltd 2018

<sup>9</sup> Pembrokeshire Coast National Park Authority Annual Monitoring Report 3<sup>rd</sup> October 2018.

**Table 2 Communities where Thresholds have been reached.**

<b>Count</b>	<b>Community</b>	<b>Transactions</b>	<b>Median House Prices / Median Wage</b>	<b>Affordable Housing Stock</b>	<b>2 bed room</b>	<b>4 bedroom</b>	<b>No usual resident</b>	<b>Higher Council Tax bracket</b>	<b>Second Home Council Tax</b>	<b>Community Facilities</b>	<b>Within/ Partly Within/ Outside NP</b>
2	Ambleston	Ambleston		Ambleston							Out
4	Amroth			Amroth			Amroth	Amroth		Summerhill	Partly
1	Boncath			Boncath							Out
2	Brawdy		Brawdy	Brawdy							Partly
5	Burton		Burton	Burton	Burton	Burton		Burton			Partly
2	Camrose			Camrose	Camrose						Out
1	Carew			Carew							Partly
1	Cilgerran			Cilgerran							Out
1	Clynderwen			Clynderwen							Out
3	Cosheston			Cosheston	Cosheston			Cosheston			Partly
1	Cwm Gwaun	Cwm Gwaun									Partly
5	Dale		Dale		Dale		Dale	Dale	Dale		In
2	Dinas Cross						Dinas Cross	Dinas Cross			In
1	East Williamston			East Williamston							Out
1	Eglwysrw			Eglwysrw							Partly
2	Hayscastle			Hayscastle	Hayscastle						Partly
3	Herbrandston			Herbrandston	Herbrandston					Herbrandston	In
2	Hundleton			Hundleton	Hundleton						Out

<b>Count</b>	<b>Community</b>	<b>Transactions</b>	<b>Median House Prices / Median Wage</b>	<b>Affordable Housing Stock</b>	<b>2 bed room</b>	<b>4 bedroom</b>	<b>No usual resident</b>	<b>Higher Council Tax bracket</b>	<b>Second Home Council Tax</b>	<b>Community Facilities</b>	<b>Within/ Partly Within/ Outside NP</b>
2	Jeffreyston		Jeffreyston	Jeffreyston							Partly
2	Lampeter Velfrey			Lampeter Velfrey	Lampeter Velfrey						Out
2	Lamphey						Lamphey			Lamphey	Partly
3	Llanddewi Velfrey		Llanddewi Velfrey	Llanddewi Velfrey	Llanddewi Velfrey						Out
2	Llanrhian				Llanrhian		Llanrhian				Partly
2	Llanstadwell			Llanstadwell	Llanstadwell						Out
2	Llawhaden		Llawhaden	Llawhaden							Partly
1	Maenclochog			Maenclochog							Partly
1	Manordeifi			Manordeifi							Out
3	Marloes & St Brides		Marloes & St Brides				Marloes & St Brides			Marloes village	In
2	Martletwy		Martletwy	Martletwy							Partly
1	Mathry			Mathry							Partly
1	Mynachlog-Ddu			Mynachlog-Ddu							Partly
3	Nevern		Nevern	Nevern				Nevern			In
1	New Moat			New Moat							Out
4	Newport		Newport				Newport	Newport	Newport		In
2	Nolton and Roch			Nolton and Roch			Nolton and Roch				Partly
2	Penally		Penally	Penally							Partly
3	Pencaer		Pencaer	Pencaer			Pencaer				Partly
3	Puncheston		Puncheston	Puncheston	Puncheston						Partly
1	Rosemarket							Rosemarket			
1	Rudbaxton			Rudbaxton							Out
2	Saundersfoot			Saundersfoot			Saundersfoot				In

Count	Community	Transactions	Median House Prices / Median Wage	Affordable Housing Stock	2 bed room	4 bedroom	No usual resident	Higher Council Tax bracket	Second Home Council Tax	Community Facilities	Within/ Partly Within/ Outside NP
3	Solva		Solva				Solva			Solva	Partly
3	Spittal			Spittal	Spittal			Spittal			Out
2	St Davids		St Davids				St Davids				In
1	St Mary Out Liberty						St Mary Out Liberty				Partly
1	St. Dogmaels			St. Dogmaels							Partly
2	St. Florence				St. Florence			St. Florence			Out
1	St. Ishmaels									St. Ishmaels	In
1	Stackpole & Castlemartin		Stackpole & Castlemartin								In
1	Templeton			Templeton							Out
3	The Havens						The Havens		The Havens	Little Haven	Partly
2	Tiers Cross			Tiers Cross	Tiers Cross						Out
3	Uzmaston, Boulston and Slebech			Uzmaston, Boulston and Slebech	Uzmaston, Boulston and Slebech	Uzmaston, Boulston and Slebech					Partly
1	Walwyns Castle	Walwyns Castle									Partly
1	Wiston				Wiston						Out
1	Wolfscastle		Wolfscastle								Out
<b>Count</b>		3	17	38	17	2	14	10	3	7	

37. With 15 Indicators in total analysed the highest number of counts (5) were in Burton (partly in the National Park) and Dale (wholly within the Park), followed by Amroth (partly in the National Park) and Newport (wholly in the National Park) (count of 4 each).
38. The most common issues in the communities analysed were, affordability in terms of the median wage versus the median house price and a lower number of 2 bedroomed properties. These communities were a mix of within the National Park, partly within and lying wholly outside the National Park. This was followed by a focus under 'non usual resident' communities in the National Park.
39. This paper now discusses whether this data suggests that a planning policy approach that controlled the occupancy of all new property with a local occupancy control and/or a principal residence control is the solution.
40. **Affordability:** This is an issue for many communities in Pembrokeshire. It is more acute in the higher market value areas of the National Park (Newport and Tenby housing submarket areas being the highest value areas). With that dilemma comes the ability to negotiate greater levels of affordable housing. The Plan proposes 50% provision in these locations. Chapters 4 and 5 below discuss the ability to negotiate 100% local needs/principal residence occupancy controls in terms of planning policy and impact on viability respectively. These chapters explain why the Authority has concerns regarding including such controls in the mix.
41. If the aim is to improve the affordability of new dwellings then the Authority's view would be to focus on maximising affordable housing delivery. The Authority has not however sought more than 50% in any location in the National Park (save for exceptional land releases for affordable dwelling sites), given its experience of seeking higher requirements in the first Local Development Plan. The approach, which sought higher percentages in specific locations, was widely perceived as undeliverable and by placing such requirements on sites the National Park Authority was in effect reinforcing the perception. The Authority adopted Local Development Plan 1 just after the 2008 banking crisis and this was followed by a number of years where the rates of the development were generally low. This was combined with a negative public reaction to the affordable housing requirements of the Plan (with generally a 50% or more affordable housing requirement). The Authority moved on from that time with the benefit of adopting revised supplementary planning in 2014. This approach has been taken forward in Local Development Plan 2.
42. **2 bedroomed properties:** It is understood that highlighting the communities with lower numbers of 2 or fewer bedroomed properties helps to

identify the locations where it may be more difficult to get access to the property market. A threshold of 20% or less has been selected. This threshold has resulted in a number of communities in Pembrokeshire being selected. The focus for affordable housing delivery by the housing authority is to provide for smaller properties (i.e., 1 and 2 bedroomed properties) which will assist. The Authority is also awaiting the new Local Housing Market Assessment which may help to identify bedroom size needs within market housing developments. Policy 50 (Housing Densities and Mix) will provide a suitable context for considering this issue in more depth.

43. **No usual resident:** A substantial percentage of the 'no usual resident communities' selected lie within or partly within the National Park. These properties include holiday lets which, in principle, are supported by the Authority for the local economy. The Authority recognises however that a balance has to be struck and therefore limits new-build holiday let within Centres and building conversions and prioritises the delivery of affordable housing. A new build house with no occupancy controls can however become either a second home or a holiday let. Chapter 4, however, advises on the Authority's concerns that affordable housing can only be negotiated on the back of market housing provision. Viability issues are also discussed in Chapter 5.

44. The **conclusions** that can be drawn are:

- There is a mosaic of communities across Pembrokeshire that reach some of the thresholds used by others in evidencing policies. There is not a consistent pattern of issues that are attributable to one or a group of communities.
- The communities identified lie either wholly inside, partly inside and sometimes completely outside the National Park which would have implications for Pembrokeshire County Council as planning authority – see also section below on the Joint Unitary Development Plan Policy 47.
- Analysis of education, retail and community facilities do not show a pattern of overall decline in the National Park which is used as part of the rationale for proposing these types of policies elsewhere.
- Where an issue is highlighted within communities, the use of standalone occupancy controls on new build development is not considered to be the logical response.

## **Chapter 4 Comparison of effect with the Authority's current approach (open market and affordable housing)**

45. The purpose of the table overleaf (Table 3) shows the consequences of different types of occupancy controls.

46. The table covers the following housing control types:

- social rented housing controls;
- low cost home ownership (intermediate housing);
- private rented affordable (intermediate rented);
- local occupancy controls; and
- principal residency controls.

47. And considers the impact of each of the following:

- Controlled to be occupied with a local connection
- Full Time Resident (definitions vary)
- Reduction of House Price (i.e. the property subject to the control)
- Impact on house rent (i.e. the property subject to the control)
- Impact on Viability of the overall Development.
- Cascade
- Mortgagee in Possession Clause
- Ability to negotiate affordable housing on market housing

48. It can be concluded that:

- Depending on the location researched, local residency occupancy controls reduce the price of housing by between an estimated 15% and 30%. The extent of the reductions is discussed in chapter 8 below. Some authorities are more cautious about providing definite percentage reductions.
- The difference between these alternative models and a low cost home ownership model is questioned. The low cost home ownership model referred to in this Authority's current Supplementary Planning Guidance on Affordable Housing advises that the cost will typically capped at a maximum of 70% of their open market value. Paragraph 2.16 page 4 and 5 **NPA065**.
- Social rented, intermediate rent, low cost home ownership and local residency occupancy controls would all, by use of those controls, mean that properties were occupied frequently.
- Principal residency controls, if the St Ives example is used, raises questions about the potential frequency of occupancy (see chapter 2

above for description) with the occupier being able to work away from home during the week.

- Finally, the Authority remains concerned about the ability to negotiate affordable housing where no unfettered, open market housing is being provided.

**Table 3 The Effect of Different Controls**

Control Type/Impacts	Social Rented <sup>10</sup>	Intermediate Rent	Intermediate Purchase (Low Cost Home Ownership)	Shared Ownership RSL initiative <sup>11</sup>	Local housing needs for market housing <sup>12</sup>	Principal Residence <sup>13</sup>
Controlled to be occupied with a local connection <sup>14</sup>	✓ <sup>15</sup>	✓	✓	✓	✓ (without price controls)	x
Full Time Resident (definitions vary)	✓ <sup>16</sup>	✓	✓	✓	✓	✓ <sup>17</sup>
Reduction of House Price (i.e. the property subject to the control)	✓ <sup>18</sup> 42% of ACG	N/A/available – Typically ownership transferred to a management company or retained privately. Rent controlled.	✓ Typically capped at 70% of open market value.	Under discussion.	✓ 15 – 20% of open market value Yorkshire Dales <sup>19</sup> North York Moors 20%. Lake District 20 – 30%	Unable to find information
Impact on house rent (i.e. the property subject to the control)	Benchmark rents <sup>20</sup> , i.e. affordable.	Rents controlled to within Local Housing Allowance, i.e. affordable but above benchmark rents.	N/A	Under discussion	Not specified <sup>21</sup>	Unable to find information
Impact on Viability of the overall Development.	See across right <sup>22</sup>	See across right.	See across right.	Under discussion	See Chapter 5.	
Cascade	✓	✓ <sup>23</sup>	✓		✓ <sup>24</sup>	Unable to find evidence on this.
Mortgagee in Possession Clause	N/A	✓	✓	Under discussion.	✓ <sup>25</sup>	Unable to find evidence on this.
Ability to negotiate affordable housing on market housing <sup>26</sup>	✓	✓	✓		x <sup>27</sup>	x

<sup>10</sup> Housing Association/Council Housing

<sup>11</sup> Potential scheme being discussed with the Registered Social Landlords and the Housing Authority.

<sup>12</sup> As defined in paragraph 4.2.9 of Planning Policy Wales Edition 10.

<sup>13</sup> St Ives definition: ...New open market dwellings will only be supported where there is a restriction to ensure its occupancy as a principal residence. Dwellings used as holiday accommodation (as second or holiday homes) are not supported. Principal residences are defined as those occupied as the residents' sole or main residence, where the residents spend the majority of their time when not working away from home. Neighbourhood Planning - Second Homes: Principal Residence Policies <https://www.cornwall.gov.uk/media/31070036/principal-residence-policies.pdf>

<sup>14</sup> Paragraph 10.16 to 10.17: Technical Advice Note 2 June 2006: 'local need' for affordable housing in rural areas, within the overall aim of contributing to sustainable communities. This can include:

- existing households needing separate accommodation in the area;
- people whose work provides essential services and who need to live closer to the local community;
- people with a family connection or long standing links with the local community; and
- people with a job offer in the locality who require affordable housing.

10.17 For some of these categories the area within which needs will be considered 'local' must also be defined in the development plan. This may include:

- the village or group of villages;
- the community council area;
- an electoral ward or group of wards;
- the local authority area.

<sup>15</sup> Local Connection allows for additional preference to be given in the 'Allocations Policy' used by the County Council and Registered Social Landlords. Registered Social Landlords currently apply a local lettings policy to all new developments on their first let (apart from specialist housing) although they would always look to match a local household with those specific needs, e.g wheelchair adapted.

<sup>16</sup> To comply with the local need occupancy control this would be full time residency.

<sup>17</sup> New open market dwellings will only be supported where there is a restriction to ensure occupancy as a principal residence. Dwellings used as holiday accommodation (as second or holiday homes) are not supported. Principal residences are defined as those occupied as the residents' sole or main residence, where the residents spend the majority of their time when not working away from home. Neighbourhood Planning - Second Homes: Principal Residence Policies

<sup>18</sup> The property is sold to the Registered Social Landlord for a percentage of Acceptable Cost Guidelines.

<sup>19</sup> Yorkshire Dales advised Gwynedd & Anglesey ...'as there is no mechanism for providing a reduction on sale, they do tend to go to the highest bidder, so the market ultimately decides, so there isn't always consistency. We tend to say 15-20% reduction on market value, but many units don't enter the market (often self-build type projects), so it's not always easy to know. In short, it is quite a crude tool – it definitely secures the objective of avoiding second/holiday home occupancy, but as for prioritising genuine housing needs, that can be a bit more hit and miss". <https://www.anglesey.gov.uk/documents/Docs-en/Planning/Planning-policy/Local/Supporting/Topic-Paper-17-Local-Market-Housing.pdf>

<sup>20</sup> Paragraph 13.2 of Technical Advice Note 2 June 2006 advises that the involvement of a registered social landlord secures sufficient control over future occupancy of affordable housing. Control of rents charged comes with the 'Regulatory Code for Housing Associations in Wales' where rents can be no greater than benchmark rents (see Glossary of Terms Annex B).

<sup>21</sup> 4.19 of the Supplementary Planning Guidance Local Market Housing, March 2019 Gwynedd & Anglesey: Providing a specific discount on local market units will not be relevant as they are not affordable units. Any price or rent reduction compared to what would be expected on the open market would be something that would happen based on the impact of the policy and factors and mechanisms within the housing market. It does not necessarily mean that the price of any property will be lower than its value on the open market. No formal mechanism will be introduced that would ensure a reduction in the value of local market properties. The only thing being controlled will be the size of the property and those who are eligible to live in such a property.

<sup>22</sup> NPA042 [Affordable Housing Viability Study May 2017 \(Technical Update June 2019, Pages 9-10\)](#)

<sup>23</sup> See paragraphs 5.20 to 5.27 of Pembrokeshire Coast National Park Authority's LDP1 Supplementary Planning Guidance November 2014

<sup>24</sup> See paragraphs 5.5 to 5.11 of Local Market Housing Supplementary Planning Guidance to the Gwynedd and Anglesey Joint Local Development Plan March 2019

<sup>25</sup> See paragraphs 5.12 to 5.14 of Local Market Housing Supplementary Planning Guidance to the Gwynedd and Anglesey Joint Local Development Plan March 2019

<sup>26</sup> PPW10, paragraph 4.2.30 last sentence 'In principle all new market housing sites, ...may contribute to meeting the need for affordable housing.' PPW10, paragraph 4.2.26 'All other types of housing are referred to as 'market housing' that is private housing for sale or rent where the price is set in the open market and occupation is not subject to control by the local (planning) authority.'



## Chapter 5 Viability impacts on housing sites

49. The Affordable Housing Viability Study (NPA042) establishes eight “affordable housing sub-market areas” in the National Park and provides an analysis of affordable housing viability for those areas based on a one hectare scheme. All of the viability modelling was done using the Wales Development Appraisal Toolkit (DAT). Each sub-market area has a Benchmark Land Value (BLV) per hectare, which represents a reasonable uplift on the value of agricultural land.
50. Using the Affordable Housing Viability Study 2017 as a starting point the Authority has carried out some further modelling using the Wales Development Appraisal Toolkit to demonstrate the impact of the worst and best case scenario reductions in market value that may arise from the application of a residency occupancy control on new build homes. Table 4 below sets out the assumptions that have been applied in this modelling and Table 5 provides a summary of the results.

**Table 4: Assumptions**

Assumption	Value applied
Land Value Benchmark	Adjusted for higher and lower value areas. Table 5.2 Highest is £552,273  Lowest is £284,659.
House Prices/Sub market areas	House prices as per July 2016 data <sup>28</sup> . - see Postcode Area Groupings in Table 3.1. Page 8 of the 2017 Affordable Housing Viability Study.
Build Cost	BCIS costs January 2017
Professional Fees	As per 2017 Affordable Housing Viability Study.
Internal overheads	As per 2017 Affordable Housing Viability Study.
Finance	As per 2017 Affordable Housing Viability Study.
Marketing Fees	As per 2017 Affordable Housing Viability Study.
Developer Return	As per 2017 Affordable Housing Viability Study.
Contractors Return	As per 2017 Affordable Housing Viability Study.
Density and Development Mix	As per 2017 Affordable Housing Viability Study.
Unit Sizes	As per the DAT January 2017 Guidance notes (annex 3, page 74)

<sup>28</sup> The market figures were adjusted to 70% and 85% respectively to produce modelled figures for residual land value under -30% and -15% market value reduction scenarios.

<b>Assumption</b>	<b>Value applied</b>
Rented/ LCHO mix	Most need is rented. LCHO difficult to secure in perpetuity.
Acceptable Cost Guidelines	42% of ACG
Planning Obligations	£4,607 per unit
Building Regulation Requirements	Includes Building Regulation Requirements Sprinklers – not included
Submarket Areas	8 submarket areas – highest value areas Tenby and Newport and lowest value areas South West Coast and North East National Park.
'Abnormals'/ Additional Costs	Not included. Please note BCIS plus 15% for infrastructure and external works (such as drainage, gardens, drives and estate roads) used for the standard hectare.
'Small' Sites	Using a 30 unit proposal.

**Table 5: Modelled impacts of market value reductions resulting from principal residency occupancy control**

**Viability of one hectare schemes – Impact of occupancy control.**

No Sprinklers

Affordable Housing Submarket Area	Benchmark Land Value	Viability Study suggested proportion of affordable housing	Residual land value as per Viability Study	30% reduction in market value	15% reduction in market value
Newport	£552,273	50%	£1,716,000	£532,000	£1,124,000
Tenby	£533,523	50%	£1,813,000	£668,000	£1,240,000
South East Coast	£378,409	30%	£1,141,000	£6,000	£574,000
St Davids & North Coast	£323,864	30%	£547,000	£426,000	£60,000
South West Coast	£300,000	20%	£499,000	£529,000	£15,000
St Brides Bay	£291,477	25%	£321,000	£619,000	£149,000
Estuary Hinterland	£286,364	20%	£320,000	£667,000	£174,000
North East National Park	£284,659	20%	£339,000	£642,000	£152,000

## Sprinklers

51. With the addition of sprinklers some affordable housing percentages require adjustment in order for the residual value to meet the land value bench mark.

**Table 6 Sprinklers and Residual Values**

Affordable Housing Submarket Area	Benchmark Land Value	Proportion of affordable housing (* indicates that this has been adjusted from the viability study suggestion)	Residual land value	Residual land value after 30% reduction in market value	Residual land value after 15% reduction in market value
Newport	£552,273	50%	£1,623,000	£439,000	£1,031,000
Tenby	£533,523	50%	£1,720,000	£575,000	£1,147,000
South East Coast	£378,409	30%	£1,048,000	£87,000	£481,000
St Davids & North Coast	£323,864	30%	£454,000	£519,000	£33,000
South West Coast	£300,000	20%	£406,000	£622,000	£108,000
St Brides Bay	£291,477	20%*	£320,000	£683,000	£181,000
Estuary Hinterland	£286,364	15%*	£324,000	£724,000	£200,000
North East National Park	£284,659	15%*	£333,000	£709,000	£188,000

## **Conclusions:**

52. From the above it is **concluded** that:

- At a 30% reduction in market values all of the sub-market areas can no longer meet the LVB, with the exception of Tenby. This means that in these areas the policy position for the proportion of affordable housing expected would need to be reduced. In some areas, affordable housing may no longer be viable at all.
- In the best case scenario the top three, highest value, areas are still yielding residual values greater than their respective LVBs. All other sub-market areas do not.
- Despite the fact that the Newport sub-market area has slightly higher market values than Tenby it fails to meet LVB with a 30% reduction in market value. This is due to the fact that it is in a lower Acceptable Cost Guidelines band than Tenby so the revenue from constructing affordable housing for the developer is lower in Newport i.e. 42% of a higher ACG value.

## **Chapter 6 Experience of the Policy proposed under the Joint Unitary Development Plan Adopted June 2006**

53. The purpose of this chapter is to consider the conclusions reached by the Joint Unitary Development Plan Inspector at the time on the introduction of a Park wide local needs policy known as 'Policy 47' and to highlight what the implications for considering such an approach today would be.

54. The chapter is broken down into topic areas.

### **Housing Land Supply**

55. A policy was proposed through the Joint Unitary Development Plan to limit the provision of all new housing in the National Park to meet the needs of local people (no affordable housing price controls). This was to be secured by planning obligation or condition (post Deposit stage the Authority was proposing the use of planning obligation only). The policy would have applied to all new housing in the Plan area. Circa 700 dwellings were proposed within the National Park. This provision was to count against the overall Pembrokeshire requirement. Pembrokeshire County Council proposed to develop 9,000 over the Plan period (15 years) with additional dwellings proposed to respond to a potential shortfall in the National Park's south east area.

56. **Current Position:** This Authority's Local Development Plan 2 is not reliant on Pembrokeshire County Council to compensate for a lack of provision in the National Park Authority's planning jurisdiction so this element of the Authority's rationale for the policy at that time is no longer relevant.

### **Local Areas defined**

57. A copy of the policy (Policy 47) can be found in Appendix 3. The policy would have considered need in terms of Sustainable Communities (groupings of communities that were sometimes partly in the County Council's planning jurisdiction).

58. **Current position:** The 'Sustainable Communities' concept has not been taken forward in more recent Plans by this Authority nor the County Council. A local needs policy would most likely fall to community council areas, or groups of them, which again would mean that some would fall outside or partly outside the National Park.

### **Consultation Responses**

59. The policy attracted objections covering a variety of considerations from the Welsh Assembly Government and a wide range of other bodies, organisations such as one of the main local registered social landlords, the association of local community councils, some community councils themselves, along with

many others. The proposal proved very controversial at the time with national and local news coverage and a front page spread in the national planning magazine. The County Council with whom the Authority prepared the Joint Plan also set out its concerns in the policy's reasoned justification – last sentence 5.4.40. What was considered to be positive device by the Authority aimed at assisting local communities resulted in a response that was overwhelmingly couched in terms of stopping groups of people entering the housing market or prohibiting certain groups of people migrating to the area.

60. **Current position:** Without meaningful and extensive consultation it would be difficult to anticipate what the current reaction would be. Landowners and developers would be a particular concern in terms of the deliverability issues.
61. An Officer of the County Council, as housing authority, have informally advised that they would not wish see such controls introduced, due primarily to the additional administrative burden placed on the Council/Housing Associations operating in the area.

### Evidence

62. For the Joint Unitary Development Plan, the Authority relied on the following to support the policy approach:
- a housing needs study by ORS Swansea;
  - evidence of policies operating primarily outside Wales (English National Parks);
  - a barrister opinion on human rights and support during the Joint Unitary Development Plan Inquiry; and
  - a report by Mark Tewdwr-Jones and Nick Gallent (University College London), commissioned by the National Park Authority advising on the Socio-Economic Impacts of Local and Essential Needs Housing in the National Park. These authors had also prepared a research study for the Welsh Government at that time in terms of second homes and land use planning.<sup>29</sup>
63. The approach failed in the Inspector's view at that time because:

### Artificial Distinction

64. The Inspector advised that the policy made an artificial distinction between affordable housing for local people and housing for local people. The provision was considered to be in effect affordable housing provision. *'The Authorities contend that Policy 47 is not concerned with affordable housing in the normal sense; that local needs housing is different. However the thrust of the evidence on "need" to which the Authorities refer (primarily the 2002 ORS study) in advancing this policy is that local people cannot presently find housing which they can afford.'*

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<sup>29</sup> <https://gov.wales/sites/default/files/publications/2018-10/second-and-holiday-homes-and-the-land-use-planning-system-research-report.pdf>

65. **Current Position:** This conclusion resonated with the Authority most in terms of a way forward for housing provision and hence the far greater focus on affordable housing provision in Local Development Plan 1 - the preparation of which was underway even before the Joint Unitary Development Plan was adopted. The rationale for policies elsewhere is often to provide a wider range of affordable housing although no specific thresholds for affordability are included in policies. Please see commentary under Chapter 8 also which shows that the range of price reductions achieved are, at most, those that a price reduction for low cost home ownership, i.e. 30%, would achieve.

### Shortfalls in provision were not to found across the National Park

66. This related to the Authority's reliance on its Housing Needs Study – which, as the Inspector pointed out, showed a substantial shortfall in affordable housing provision in only two locations in the National Park.

67. **Current Position:** Generally around the National Park for Local Development Plan 2 there is a shortfall in affordable housing provision which would suggest a need to focus as much as possible on affordable housing provision in line with the Plan's overall objective E Affordable Housing and Housing Growth, page 20 Local Development Plan 2 with focussed changes, PPW10 edits **Exam06**.

### Occupancy Controls Rationale

68. The Inspector advised that the occupancy restrictions were too generous and did not represent the sort of judicious and appropriate use of a limited land supply that this policy purportedly intended to achieve.

*“Occupancy is limited to a local person (in essence, someone already living within or having a strong local connection with the sustainable community) or someone with an essential need to live within the sustainable community. Yet, as previously noted, with little exception the majority of the land within the respective relevant sustainable communities lies outside the National Park. Accordingly this policy will enable, indeed encourage, a qualifying person currently living or perhaps working outside the National Park (where substantial housing provision is being made to meet both general and local needs) to build and occupy a dwelling elsewhere in the same sustainable community within the designated area (where there is limited capacity for more development). This does not represent the sort of judicious and appropriate use of a limited land supply that this policy purportedly is intended to achieve.”*

69. The background to the generous definition of the qualifying criteria was the need to ensure that communities were geographically recognised beyond the National Park boundary. This meant the communities outside the National Park which had their own supply of housing land could be regarded as meeting local need in the National Park.

70. **Current Position:** The National Park is a landscape designation which means that the implications for communities would need to be considered on both sides of the National Park boundary. There was/is also a need to consider cascading which added to the dilution. More recently the issue of a mortgagee in

possession<sup>30</sup> clause has become more prominent. This would bring in additional concerns regarding the dilution of impacts.

### Scale of Impact

71. The Inspector advised that the amount of housing the Policy could provide was considered to be negligible. Of the 700 or so dwellings identified at June 2003 over 300 were either under construction or had the benefit of a planning permission.
72. **Current Position:** Local Development Plan 2 proposes a provision of 1,150 to meet a requirement of 960 dwellings. Completions and land with permission accounts for an estimated 301 dwellings (Table 5 Components of Housing Land Supply Exam06). Table 6 sets out an affordable housing provision figure of 359 to meet a requirement of 250. The requirement levels are higher in Local Development Plan 2 but in terms of Local Development Plan 2 there is also a greater emphasis on affordable housing provision as part of the requirement.

### Administration

73. The Inspector advised that the operation of the policy would be complex and practically unworkable.
74. **Current Position:** The Authority, at the time, attempted to apply the policy in advance of the Joint Unitary Development Plan Inquiry by applying a prematurity argument. This gave an initial insight into the complexity of applying such a policy. The Supplementary Planning Guidance adopted by Gwynedd and Anglesey<sup>31</sup> shows that Gwynedd/Anglesey is taking a similar approach (except there is no National Park planning authority involved and the adequacy of existing accommodation does not appear to be tested in Anglesey and Gwynedd's Supplementary Planning Guidance). Issues for this National Park Authority included/would include:
- Administering a policy dealing with housing related matters where the skill set needed (a Housing Officer) was not available. The Authority would need the assistance of Pembrokeshire County Council as housing authority and there appears to be no incentive to do so because the proposals do not appear to be directed at the delivery of affordable housing. The County Council currently administers the occupancy of low cost home ownership in Pembrokeshire.
  - Administering a policy which blurred the boundaries between the role of the housing authority in delivery affordable housing and the planning authority. The qualifying criteria matched those used to deliver affordable housing. This was/would be confusing to the public.
75. This experience led to the question: what is the difference between 'local market housing' and low cost home ownership and intermediate rental properties in terms of the objectives being sought? Should the objective instead be seeing how a

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<sup>30</sup> With evidence of unsuccessful marketing properties can be marketed on the open market.

<sup>31</sup> <https://www.anglesey.gov.uk/documents/Docs-en/Planning/Planning-policy/Supplementary-Planning-Guidance/Local-Market/May-2-Local-Market-Housing.pdf>

range of affordable housing can be delivered to meet a range of affordable housing needs (i.e. meeting social rented housing needs and intermediate housing needs where prices or rents are above those of social rent, but below market housing prices and rents<sup>32</sup>)? How comprehensive is the Plan provision to provide for a range of affordable housing needs which can be responded to by the local planning authority in partnership with the housing authority and housing associations etc.?

### Social Engineering

76. The Inspector advised that the policy strayed into areas that go beyond straight forward land use planning:

*“Furthermore in my judgement the Plan’s specified qualifying criteria, including the interpretation of such terms as “local person”, “strong local connection”, “unsuitable accommodation” and “overcrowding” and the requirement for applicants to demonstrate compliance with those provisions both initially and on subsequent changes of occupancy, are so extensive and complex as to render this policy virtually unworkable in practice. These criteria appear over-prescriptive and stray into territory which goes beyond straightforward land-use considerations. I find support for these conclusions, surprisingly, from the Plan itself wherein the supporting text confirms that the “County Council has concerns over the appropriateness of the criteria to be applied under this policy”.*

77. **Current Position:** The occupancy controls used in Policy 47 are similar to those used/proposed in other planning authority areas today to deliver affordable housing and to control occupancy and pricing.

### Coastal National Park

78. The Inspector advised that compared with other areas in the United Kingdom where these policies operate the Pembrokeshire Coast National Park is a coastal Park with land being provided in reasonable proximity to the Park itself.

79. One of the issues raised in relation to second homes is the competition for housing from second home owners. Such an impact needs to be factored into future dwelling requirements.<sup>33</sup>

80. The role of second homes in housing provision has already been factored into household projection work for various development rates – see paragraph 3.5 Background Paper Pembrokeshire Demographic Forecasts June 2018 by Edge Analytics (NPA043), paragraphs B22 and B23. This approach factors in an element of provision to housing targets to account for the proportion of second homes that have been historically in the housing stock.

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<sup>32</sup> Welsh Assembly Government: [Technical Advice Note 2 June 2006](#), section 5, page 4.

<sup>33</sup> Ref to Neighbourhood Planning Second Homes: Principal Residence Policies.  
<https://www.cornwall.gov.uk/media/31070036/principal-residence-policies.pdf>

81. **Current Position:** This hasn't changed for this National Park. The Inspector noted that the exceptions to this (i.e. having land provided for in reasonable proximity to the Park itself) were St Davids and Newport but did not make with any specific recommendations for these locations.

### Impact on house prices

82. The Inspector advised that there might be a negligible impact on the price of houses affected by the policy and there may be a rise in prices in the general housing stock. He advised the Authorities also relied for support on the findings of a recent study by Mark Tewdwr-Jones and Nick Gallent relating to the National Park and the implications of a local needs policy. This study says it is questionable whether local households who currently experience problems of affordability and access to housing would, if Policy 47 restrictions were in place, enjoy greater affordability and access; it concludes that there would be a negligible impact on new house prices but possibly a sharp rise in the price of existing housing. *'To my mind those findings, which contradict what the Plan suggests, simply add strength to my conclusion that this policy would not achieve its aims of making housing in the National Park more affordable for local people in need.'*

83. **Current Position:** The Inspector's conclusion is what the Authority has taken forward as a basis to frame policies in the current and emerging Local Development Plan.

### Human Rights

84. As there was insufficient evidence to justify the inclusion of the Policy (known as 'Policy 47') in the Plan the Inspector advised that an infringement of human rights would arise if the policy was adopted.

85. **Current Position:** This as with any policy would need to be justified on the evidence base and Policy 47 failed to meet the exacting standards expected.

86. **Overall conclusion:** The situation for this National Park Authority is that:

- The supporting evidence for such policies, when considered for this National Park, is not robust enough to justify introducing additional occupancy controls through the Local Development Plan.
- Geographically communities lie both inside and partly inside the National Park. Any policy response to issues needs collaborative working with the relevant authorities and associations.

## Chapter 7 Sustainability Appraisal

### Sustainability Appraisal – Summary of Anglesey and Swansea

87. Gwynedd and Anglesey have only carried out sustainability appraisal on their strategic policies and not the detailed policies of the Joint Local Development Plan, of which TAI 5 Local Market housing is one. TAI 5 is mentioned in the summary of the Sustainability Appraisal as being of benefit to Welsh Language<sup>34</sup> but no further detail is available as to how this policy would perform against other sustainability criteria. It should also be noted that Gwynedd and Anglesey specifically include a Sustainability Objective on “Local Needs”, which serves to drive this policy position.
88. Swansea Council’s Final Sustainability Appraisal Report does not provide a full detailed sustainability appraisal matrix for Policy H5 (Rural Exception Sites). However, the summary appraisal<sup>35</sup> indicates that the policy will have positive impacts on SA Objectives relating to: meeting housing need, health/well-being/inclusiveness, the viability to communities and facilities (sustaining communities) along with support of the local economy and climate change (due to reduced car use). The summary appraisal matrix<sup>36</sup> (page 157) does not indicate any negative impacts that would be inherent to all development e.g. soil reserves or biodiversity i.e. it does not foresee any negative impacts arising from the application of the occupancy condition.
89. It is important to note that Swansea and Gwynedd and Anglesey differ considerably in that Swansea’s policy is an allocation policy relating to specific sites and not the wider application of a residential occupancy control.
90. **Conclusion:** Neither Welsh example of the inclusion of a residency policy includes detailed descriptions as to what the impacts are or how they would arise through the application of the policy. At best only summary assessments are included and for Gwynedd and Anglesey’s Joint Local Development Plan no assessment was carried out at all.

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<sup>34</sup> Anglesey and Gwynedd Joint Local Development Plan Final Sustainability Appraisal, Paragraph 6.96, page 132 (<https://www.gwynedd.llyw.cymru/en/Council/Documents---Council/Strategies-and-policies/Environment-and-planning/Planning-policy/Adoption/33.-SA-Final-Adopted-July-2017.pdf>)

<sup>35</sup> Swansea Local Development Plan Final Sustainability Appraisal, Paragraph 7.8.6, page 139 ([https://swansea.gov.uk/media/30139/Final-SA-Report---February-2019/pdf/Final\\_SA\\_Report\\_-\\_February\\_2019.pdf](https://swansea.gov.uk/media/30139/Final-SA-Report---February-2019/pdf/Final_SA_Report_-_February_2019.pdf))

<sup>36</sup> Swansea Local Development Plan Final Sustainability Appraisal, Appendix 6, Table 41: SA of Deposit Policies, page 157 ([https://swansea.gov.uk/media/30139/Final-SA-Report---February-2019/pdf/Final\\_SA\\_Report\\_-\\_February\\_2019.pdf](https://swansea.gov.uk/media/30139/Final-SA-Report---February-2019/pdf/Final_SA_Report_-_February_2019.pdf))

## Sustainability Appraisal of the Pembrokeshire Coast National Park Local Development Plan

91. For ease of reference the Sustainability Appraisal for the Local Development Plan considered a principal residency policy. The text below is copied from the Alternative Options and Appraisal Background Paper **NPA057**.

92. Housing: 5 options were considered:

- **Option 1:** A policy based on the latest Welsh Government National Park Household Projections.
- **Option 2:** A policy based on providing for market housing to cross subsidise the provision of affordable housing. Affordable housing need exceeds that which the market housing can provide for. The key determinants for what can be provided are the:
  - distribution of housing development in accordance of with the Plan’s spatial strategy
  - the deliverability of sites
  - the National Park’s landscape capacity to absorb additional housing development
- **Option 3:** With an estimated supply of 1,300 housing units or less, seek to negotiate 50% affordable housing in developments of 2 or more units in housing developments. Where housing need is greater than supply in individual centres seek to allocate land for 100% affordable housing on small sites of 10 units or less. Also allow the exceptional release of land in these locations for affordable housing. There will also be opportunities in countryside locations through filling in gaps or rounding off – see Scale and Location of Growth Policy Options.
- **Option 4:** Continue with the Joint Unitary Development Plan approach and seek to negotiate 20% on sites of 3 or more units. Also allow the exceptional release of land in these locations for affordable housing within or adjacent to settlements.
- **Option 5 (arising from the Preferred Strategy consultation):** Require housing to be used as a principal residence.

93. Option 3 had the potential to score best in terms of sustainability appraisal as it had the potential to provide for more affordable housing.

Policy 47 & 49 Overall Sustainability Appraisal Summary					
Policy Option	1	2	3	4	5
Sustainability Scoring	-	++	++	+	-
Option 1: A strategy that provides only affordable housing would seem to be compatible with the SA objectives related to social inclusion and community cohesion. However, the likelihood of progressing those objectives is significantly reduced over the other options as this strategy would rely on exception sites.					

The option also relies entirely on National Policy, which allows for development in inaccessible locations. Although the chances for this to happen are low, for the reasons stated above, the other options considered are inclusive of accessibility and on the whole are more likely to progress the SA Objectives.

Option 2: As per option 3 but is likely to provide for less affordable housing due greater emphasis on deliverability.

Option 3: Some negative impacts of housing development are inevitable these include waste, carbon emissions and minerals use. Other policies within the Local Development Plan will help to mitigate these as much as possible. This policy option directs housing development to where it is needed and prioritises affordable housing over market housing. This will enable people live locally, reducing their need to travel and help to maintain communities and their cultural distinctiveness in the National Park.

Option 4: As option 3 but to a lesser degree as this policy allows for less affordable housing.

Option 5: The incidence of second and holiday home ownership in the National Park is a significant issue and does impact on the viability of communities. However, placing a principal residence occupancy condition on new dwellings would mean that no affordable housing could be secured from new developments.

<p>Soundness Test 1 Does the Plan fit?</p>	<p>Option 1 would only consider one element of the matters local planning authorities would need to take account of when determining a housing land supply.</p> <p>The second option is the most compliant with national planning policy in its drafting and in the derivation of the housing land supply.</p> <p>Option 3 which refers to the current Plan’s policy has had deliverability issues which Option 2 seek to address and therefore wouldn’t comply with national policy.</p> <p>Option 4 would not be compliant with national policy.</p> <p>With regard to Option 5 experience has shown that a similar policy approach (with occupancy controls) suggested in an earlier Plan requires a weight of evidence that is substantial. Housing figures for this National Park would in any case suggest a need to focus on the delivery of affordable housing – see comment below.</p>
<p>✓</p>	
<p>Soundness Test 2 Is the Plan appropriate?</p>	<p>Option 2 and 3 takes account of the need for housing/affordable housing in the area. Option 1 and 4 do not result from an assessment of these matters. Option 2 policy requirements are based on the most up to date advice available on affordable housing need, viability assessments and deliverability evidence.</p> <p>It is difficult to see how Option 5 would result the appropriate solution for the area because if all new housing was controlled in terms of occupancy this would prevent the Authority from negotiating affordable housing which is seen as a key priority of the Plan – paragraph 9.2.14 and 9.2.16 of PPW refers.</p> <p>All options would need to be underpinned by the National Park’s statutory purposes.</p>

✓	
Soundness Test 3 Will the Plan deliver?	<p>Flexibility has been written into the Development Plan's housing provision, particularly for those sites which may not come forward for development within the plan period. An additional housing provision has been considered for incorporation as contingency to allow a degree of flexibility within the Plan. This is included in Option 2.</p> <p>Sites provided for in the Plan have been subject to a Land Allocation Implementation Study to ensure deliverability is given greater attention.</p> <p>Flexibility is also offered through the use of the phrase 'seek to negotiate', the use of the Development Appraisal toolkit in testing viability and an annual assessment of viability which allows the Authority to adjust affordable housing requirements if needed.</p> <p>Option 1 is likely to result in deliverability issues in terms of affordable housing.</p> <p>Option 3 which is the current Plan policy has deliverability issues.</p> <p>Option 4 is likely to be deliverable in the more buoyant areas of the Park but there may be difficulties in lower value areas.</p> <p>There are concerns regarding the deliverability of Option 5 in terms of practical difficulties with enforcement.</p>
✓	

Policy 47 & 49: Housing and Affordable Housing Overall Soundness Summary									
Policy Option	1		2		3		4		5
Soundness Test 1	✓	x	✓	✓	x	x	x	x	x
Soundness Test 2	x	x	✓	x	✓	x	x	x	x
Soundness Test 3	x	x	✓	x	x	x	✓	x	x

94. **Conclusion:** Option 2 scored best overall in terms of sustainability appraisal and the soundness tests.

## Chapter 8 Operation in Practice elsewhere

95. The table below summarises the responses Gwynedd and Anglesey received from three National Park Authorities which helps understand what the impacts have been in those locations.

**Table 7 Other Authorities' experiences – information from Anglesey and Gwynedd Topic Paper 17 – Local Market Housing.**

	<b>Yorkshire Dales National Park Authority</b>	<b>North York Moors National Park Authority</b>	<b>Lake District National Park Authority</b>
<b>Is there any evidence / suggestion that the policy has reduced the value of properties from the value that would be expected on the open market?</b>	No mechanism for providing reduction on sale, tends to go to highest bidder. Tend to say 15-20% reduction on market value, but many units don't enter the market (self-build). Secures objective of 2 <sup>nd</sup> /holiday homes, but hit and miss if prioritising genuine housing needs.	Recent evidence from District Valuer suggests local occupancy conditions reduce the value of the property by 20%.	Generally accepted that housing with local occupancy clause reduces open market value by approx. 20%, although recently told currently in region of 30%.
<b>What were the justification and the evidence that was given over being able to implement such a policy?</b>	High house prices, low incomes, high 2 <sup>nd</sup> /holiday home occupancy and community sustainability issues stemming from that.  Specific evidence hard to come by, SHMA implied some intermediate or low cost market housing need that fell between the cracks of affordable	Local occupancy conditions introduced in 1992 Plan- to ensure limited opportunities for new housing development met local housing needs rather than external demand.  Local occupancy conditions also applied to conversions since	LDNP popularity for holidays and retirement has placed great pressure on housing market. Some areas >20% 2 <sup>nd</sup> home ownership and before 1994, occupancy of much residential development dominated by the retired. 2012 >40% of existing housing

	<b>Yorkshire Dales National Park Authority</b>	<b>North York Moors National Park Authority</b>	<b>Lake District National Park Authority</b>
	and open market provision. Heavy reliance on continuation of previous strategy that worked quite well.	2008.	stock in some parishes not used for permanent occupation.  Cumbria and Lake District Joint Structure Plan 2011-216- housing development will only be permitted where it is for local occupancy (either affordable or to meet the needs of those who can satisfy the local occupancy criteria but can afford to buy on the open market). Inspector concluded that given continuing high cost of homes inflated by high levels of 2 <sup>nd</sup> home ownership justification for this policy restriction remains valid and pressing.
<b>From a monitoring perspective, how many units have been approved / built directly based on this policy?</b>	Since 2005 – permission granted for just over 140 unit with 70 of these being completed (for context – average permissions / completions are approx.. 50 dwellings per	Since 1992 only 187 units completed which are subject to local occupancy restriction (for context – 11, 744 dwellings in total across the National Park).	Between Nov 2010 and November 2013 417 new houses permitted of which:  152 local affordable housing 230 local need housing  Between April

	<b>Yorkshire Dales National Park Authority</b>	<b>North York Moors National Park Authority</b>	<b>Lake District National Park Authority</b>
	annum).		2011- March 2013:  52 local affordable houses built  44 local need housing built.
<b>Have any problems come to light in terms of this policy e.g. are there problems regarding people being unable to get mortgages for properties?</b>	<p>Yes – since housing crash, mortgagee in possession clauses now needed so if someone defaults on a loan, it could be repossessed and disposed of on the open market therefore some units are hard to shift with sellers holding out for unrealistic prices despite occupancy restriction.</p> <p>Mortgage availability is also an issue. Some attempts have been made to remove restrictions but not granted and there have been appeal successes. Criteria has been relaxed and Authority under pressure to go further.</p>	<p>Anecdotal evidence that mortgages for local occupancy dwellings are becoming more difficult. More locally based lenders who have a greater understanding of the restrictions are more likely to lend.</p> <p>Prior to 2008 allowed small developments of up to 4 units – developers found it very difficult to sell to local people as properties large and with high prices even with a 20% reduction. Considering a floor space restriction as in Yorkshire Dales.</p> <p>Affordable Housing exception policy has been more successful in creating homes for local people with &gt;100 units completed in last 5</p>	<p>Several of the high street lenders will not finance new build properties with a local occupancy clause. However, there are several local lenders that will. For the larger windfall sites, local lenders will lend on 25% of the scheme.</p>

	<b>Yorkshire Dales National Park Authority</b>	<b>North York Moors National Park Authority</b>	<b>Lake District National Park Authority</b>
		years.	

96. In **conclusion**: (for the Yorkshire Dales, North York Moors and the Lake District):

- In terms of property value reductions as a result of the imposition of the occupancy control, figures quoted range from 15% to 30%. There was a degree of uncertainty with this as price controls are not inbuilt in the control mechanisms.
- Regarding properties completed the number with occupancy controls are a small number relative to overall completions (except for the Lake District) or the overall housing stock in the National Park.
- Comments are provided regarding mortgage issues, including mortgagee in possession clauses, expectations regarding what a property will sell for, the need to focus on a small number of properties on a site and difficulties in selling.

97. The Authority has also made contact with Anglesey/Gwynedd, Swansea and Cornwall in terms of any conclusions reached with monitoring being done on the policies implementation.

### **Principal Residence Cornwall:**

98. Cornwall County Council has advised (24<sup>th</sup> July 2019) that this is not something that is actively monitored – in an area with an adopted neighbourhood plan that stipulates a Principal Residency Condition, any permission for a new home approved after the adoption date should have this. The areas with an adopted Neighbourhood plan that have this policy are: St Ives Area, St Minver Parishes (High and Lowlands), Rame Peninsula (Antony, St John, Millbrook, Shevioc, Maker with Rame), Mevagissey and St Agnes.

### **Anglesey and Gwynedd:**

99. Anglesey and Gwynedd advise

- Since the adoption of the JLDP, the number of local market housing permissions and applications have been low. In the period of the Plan's

first AMR (up to 31/3/19), 2 local market housing units have received planning permission with none yet completed.

- What has become evident is that there have been a number of planning applications in the settlements specified in Policy TAI 5 for the demolition and re-build of housing within the boundary. Policy TAI 5 does not apply to such proposals.
- An SPG was adopted in March 2019 in relation to this policy and can be found at the following link:  
<https://www.gwynedd.llyw.cymru/en/Council/Documents---Council/Strategies-and-policies/Environment-and-planning/Planning-guidance/May-2-Local-Market-Housing.pdf>

## Swansea

100. Swansea County Council advise (14<sup>th</sup> August 2019) there has only been one planning permission granted so far by means of a condition (the Plan was adopted in February 2019). Enforcement issues will need to be proved in the long term. There is nothing in the monitoring framework and no programme of site surveys / visits to check compliance, but Officers believe it will be self-policing as they are small sites where the local community will likely inform the Council if houses appear to be empty / being used as holiday homes.

### 101. **Conclusions:**

- Policies in the English National Park areas have more historical data to refer to in terms of completions and the impact on house prices of the properties with the occupancy control. Evidence of impacts on the housing market generally is not that easy to locate.
- Policies in Cornwall and Wales have not had time to bed in for the Authority to understand the impacts.

## **Chapter 9 Are there unintended consequences of these types proposals?**

102. The purpose of this chapter is to consider the issue of potential unintended consequences from this National Park Authority's understanding of such policies.

### **Wider housing market impacts**

103. These controls would only apply to new build and would not apply to existing housing which is generally free of any such restriction. For that reason their value (i.e. the value of existing housing) may increase and affordability may decrease rather than increase.
104. These controls may deter developer interest as the restrictions will reduce final house prices and reduce margins. The viability assessment carried out by the Authority would support this conclusion.

### **Affordable Housing Delivery**

105. With a principal residence occupancy control (i.e. an occupancy control is placed on the property by the local planning authority) or a local market house occupancy control, the properties cannot be classed as 'market housing' and therefore contribute to meeting the need for affordable housing. This is why the Authority does not impose an affordable housing contribution on holiday lets, for example. Planning Policy Wales 10 December 2018<sup>37</sup>, paragraph 4.2.30 last sentence 'In principle all new market housing sites, ...may contribute to meeting the need for affordable housing. PPW10, paragraph 4.2.26 *'All other types of housing are referred to as 'market housing' that is private housing for sale or rent where the price is set in the open market and occupation is not subject to control by the local (planning) authority.'*

### **Low Cost Home Ownership 'versus' Local Occupancy Controls:**

106. Anglesey and Gwynedd argued that there was a need for market housing for locals which was not quite open market prices but not quite Low Cost Home Ownership levels.
107. The comparison tables show that the implications of local occupancy controls will reduce house prices (the amount ranges from 15% to 30%). There

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<sup>37</sup> <https://gov.wales/sites/default/files/publications/2018-12/planning-policy-wales-edition-10.pdf>

appears to be no way of illustrating that this is guaranteed to be achieved in reality – see note from Yorkshire Dales.

108. The current Low Cost Home Ownership model operated here uses ceiling 30% reduction on open market values which is inserted into the S106 agreement.

109. In terms of affordability in the local housing market please see chapter 5.

### Objective of building sustainable communities

110. The underlying objective of most of these policies appears to be to achieve more people living locally helping to sustain communities. There is a more obvious link with local occupancy controls as occupants are more likely to be living locally. They are however very similar to low cost home ownership controls.

111. With principal residency controls it is not as clear. Cornwall County Council submitted that a person can potentially work away from their home for five days a week without being in breach of the policy by retaining their home in St Ives as their principal residence.<sup>38</sup>

### Enforcement and Compliance:

Principal Residence
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112. There is a problem with the criteria used to define the term 'principal residence' and whether or not those criteria are capable of being fulfilled by evidence that can be easily assessed as credible and reliable. Leaving aside those occupiers who may deliberately want to confuse the issue, there may be cases where identifying the principal residence is genuinely not straight forward. It is obviously important to be able to determine if a restriction is being observed in compliance with the policy aims. How can a breach be proved? A planning condition, or planning obligation in a section 106 agreement, is only valid if enforceable and only enforceable if a breach is capable of proof.

113. In terms of the St Ives Policy H2 does not define what it means by principal residence. The only evidence of occupation as a principal residence suggested by the policy is registration on the electoral roll or for local services such as schools and GPs.

114. These are not conclusive forms of evidence of principal residence occupation. It is quite legitimate, for example, to be on the electoral roll in more than one

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<sup>38</sup> Neighbourhood Planning Second Homes: Principal Residence Policies.  
<https://www.cornwall.gov.uk/media/31070036/principal-residence-policies.pdf>

location (as long as you don't vote twice in the one election). Being registered at the GPs can be on a temporary residency basis but that could mean that you are in effect working away from home for most of the year and practically living in the second property (away from home) full time.

115. A minimum number of days' occupancy amounts to a definite criterion if justifiable, albeit one that is difficult to monitor accurately or reliably prove one way or the other.
116. If a policy doesn't have the criteria and evidence specified then these will need to be clearly stipulated in the planning condition and/or legal agreement. Without clear definitions and criteria monitoring will be difficult. There will also be a need to take into account the personal circumstances of the owner at the time when considering enforcement proceedings.
117. The evidence available on this from the St Ives proposal is not sufficient to consider that such a control would be easily enforced.

#### Local Occupancy

118. The issues listed above under Chapter 6 are the main issues for this Authority in applying such controls.

#### **Overall Conclusion**

119. The Authority does not consider the inclusion of a local needs/primary residency occupancy controls are justified or appropriate for the Pembrokeshire Coast National Park.
120. The reasons are:
  - When analysing the indicators used elsewhere the evidence base would not suggest that such an approach is appropriate for this National Park. The conclusions that can be drawn are that:
    - There is a mosaic of communities across Pembrokeshire that reach some of the thresholds used by others in evidencing policies. There is not a consistent pattern of issues that are attributable to one or a group of communities.
    - The communities identified lie either wholly inside, partly inside and sometimes completely outside the National Park which would have implications for Pembrokeshire County Council as planning authority.
    - Analysis of education, retail and community facilities do not show a pattern of overall decline in the National Park which is used as part of the rationale for proposing these types of policies elsewhere.

- Where an issue is highlighted within communities, the use of standalone occupancy controls on new build development is not considered to be the logical response.
- Depending on the location researched, local residency occupancy controls reduce the price of housing by between 15% and 30%. The difference between these alternative models and a low cost home ownership model is questioned.
- Social rented, intermediate rent, low cost home ownership and local residency occupancy controls would all, by use of those controls, mean that properties are occupied frequently.
- Principal residency controls, if the St Ives example is used, raises questions about the potential frequency of occupancy with the occupier being able to work away from home during the week.
- The inclusion of occupancy controls on all market housing would impact adversely on the delivery of affordable housing, a key objective of the Plan.
- Finally, the Authority remains concerned about the ability to negotiate affordable housing where no unfettered, open market housing is being provided.
- Chapter 6 reviews the relevance of the conclusions reached when the Authority considered pursuing a local occupancy policy for the Joint Unitary Development Plan adopted in 2006 for today. The conclusions reached are:
  - The supporting evidence for such policies, when considered for this National Park, is not robust enough to justify introducing additional occupancy controls through the Local Development Plan.
  - Geographically communities lie both inside and partly inside the National Park. Any policy response to issues needs collaborative working with the relevant authorities and associations.
- The appraisal and soundness tests conclusions for a principal residency policy in this National Park did not support pursuing such an approach **NPA057**.
- Chapter 9 considers the potential for unintended consequences. Concerns regarding potential adverse impacts on the wider housing market, affordable housing delivery, along with questions as to whether the objectives of sustaining communities can be achieved are raised. Enforcement and compliance is also an issue.

**Appendix 1 Indicators to establish whether there are relevant areas of introducing a local housing market:**

<b>Indicator</b>	<b>Source</b>	<b>Geographical Level</b>	<b>Period</b>	<b>Further information</b>	<b>Application</b>
Affordability ratio	CACI Paycheck and the Land Registry	Ward	2011 and 2012	<ul style="list-style-type: none"> <li>Ratio between the median house prices and the median household incomes.</li> <li>Use information for more than 1 year to take account of natural variance.</li> </ul>	A ratio of 10.0 is the threshold for selecting the most extreme areas in terms of this indicator.
Lower quartile ratio	CACI Paycheck and the Land Registry	Ward	2011 and 2012	<ul style="list-style-type: none"> <li>Ratio between lower quartile house prices and the lower quartile house incomes.</li> <li>Use information for more than 1 year to take account of natural variance.</li> </ul>	A ratio over 15.0 is the threshold for selecting the most extreme areas in terms of this indicator.
Percentage of people priced out of the market	CACI Paycheck and the Land Registry	Ward	2011 and 2012	<ul style="list-style-type: none"> <li>Percentage of households that have an income below 3.5 times lower quartile house price.</li> <li>Use information for more than 1 year to take account of natural variance.</li> </ul>	80% of households priced out of the market is the threshold for selecting the most extreme areas in terms of this indicator.
Second homes	Council Tax Depts of Gwynedd and Anglesey Councils	Community/ Town/City Council areas	November 2013	<ul style="list-style-type: none"> <li>Percentage of second homes based on Council Tax information.</li> </ul>	More than 25% of the properties are second homes.
Migration	Information based on proxy – percentage born outside Wales.	Output Areas	2011 Census	<ul style="list-style-type: none"> <li>There is no direct information about this aspect, therefore a proxy is used.</li> </ul>	Over 60% population born outside Wales is the threshold for selecting the most extreme areas in terms of this indicator.
Link between house prices and quality of	Welsh Index of Multiple Deprivation	Lower Super Output Areas	Welsh Index of Multiple Deprivation	<ul style="list-style-type: none"> <li>Consider the score for each area.</li> </ul>	A score of 1750 or more for the

<b>Indicator</b>	<b>Source</b>	<b>Geographical Level</b>	<b>Period</b>	<b>Further information</b>	<b>Application</b>
the environment	2011 regarding the 'physical environment'.		2011		indicator 'Physical Environment' is the threshold for selecting the most extreme areas in terms of this indicator.
Council Tax Bands	Council Tax Depts of Gwynedd and Anglesey Councils	Community/ Town/City Council Areas	November 2013	<ul style="list-style-type: none"> <li>Consider the percentage of houses that are in high tax bands ie G, H, and I bands.</li> </ul>	More than 10% of properties in Tax Bands G, H and I is the threshold for selecting the most extreme areas in terms of this indicator.
Number of house sales	The Land Registry	Wards	2011 and 2012	<ul style="list-style-type: none"> <li>Consider the number of houses sold in specific areas. If it is a substantial figure it is noted that there is an adequate number of houses available for those who need them.</li> <li>A low number of sales also suggests a lack of movement within a local housing market.</li> <li>Use information for more than 1 year to take account of natural variance.</li> </ul>	12 or fewer house sales in a ward in a period of 1 year is the threshold for selecting the most extreme areas in terms of this indicator.
Percentage of empty places in schools	Education Depts of Gwynedd and Anglesey Councils	Primary school catchments	Periods of 10 years 2003 to 2013	<ul style="list-style-type: none"> <li>Consider the percentage of empty spaces in schools.</li> <li>Use information over a period of 10 years to take account of the natural variance in the number of pupils who attend schools.</li> <li>The larger the percentage of empty spaces,</li> </ul>	No threshold specified.

<b>Indicator</b>	<b>Source</b>	<b>Geographical Level</b>	<b>Period</b>	<b>Further information</b>	<b>Application</b>
				it is assumed that there are fewer families and children living in those communities.	

The figures are worked out for each indicator and then scored. The highest ratio is scored 100 and the rest are scored as a ratio of the highest. e.g.

Ward 1 ratio is 12.0 – this is scored 100

Ward 2 ratio is 10.2 – this is scored 85.2 etc. etc

The information was then mapped for each indicator using choropleth maps (colour bands) thus showing the most affected areas for each indicator.

The ‘worst case’ areas were selected on the basis of the mapping and then each of the indicators was weighted to reflect their significance or importance. Indicators such as the number of second homes and migration were given the highest weightings.

The information derived from the indicators was collected at different geographical areas and at this point they were all converted to ward areas. (Where this is not available 2 ward scores were produced – the highest and lowest score – e.g. where a ward crosses 2 community council areas). The ‘worst affected’ ward was scored 100 and each after scored on a ratio compared with the worst ward.

The information was presented with and without weighting and the wards highlighted as being appropriate for a local housing market policy.

## **APPENDIX 2 APPROACHES TAKEN ELSEWHERE & DATA FOR PEMBROKESHIRE**

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AFFORDABILITY

**TRANSACTIONS:** Gwynedd and Anglesey have used the number of house sales using Land Registry data for Wards 2011 and 2012. Consider the number of houses sold in specific areas.

- If it is a substantial figure it is noted that there is an adequate number of houses available for those who need them.
- A low number of sales also suggest a lack of movement within a local housing market.
- Use information for more than 1 year to take account of natural variance. 12 or fewer house sales in a ward in a period of 1 year is the threshold for selecting the most extreme areas in terms of this indicator.

The table below for Pembrokeshire identifies three locations where transactions are low in number.

**Table 1: Number of Housing Transactions by Community Council (2016-2018)**

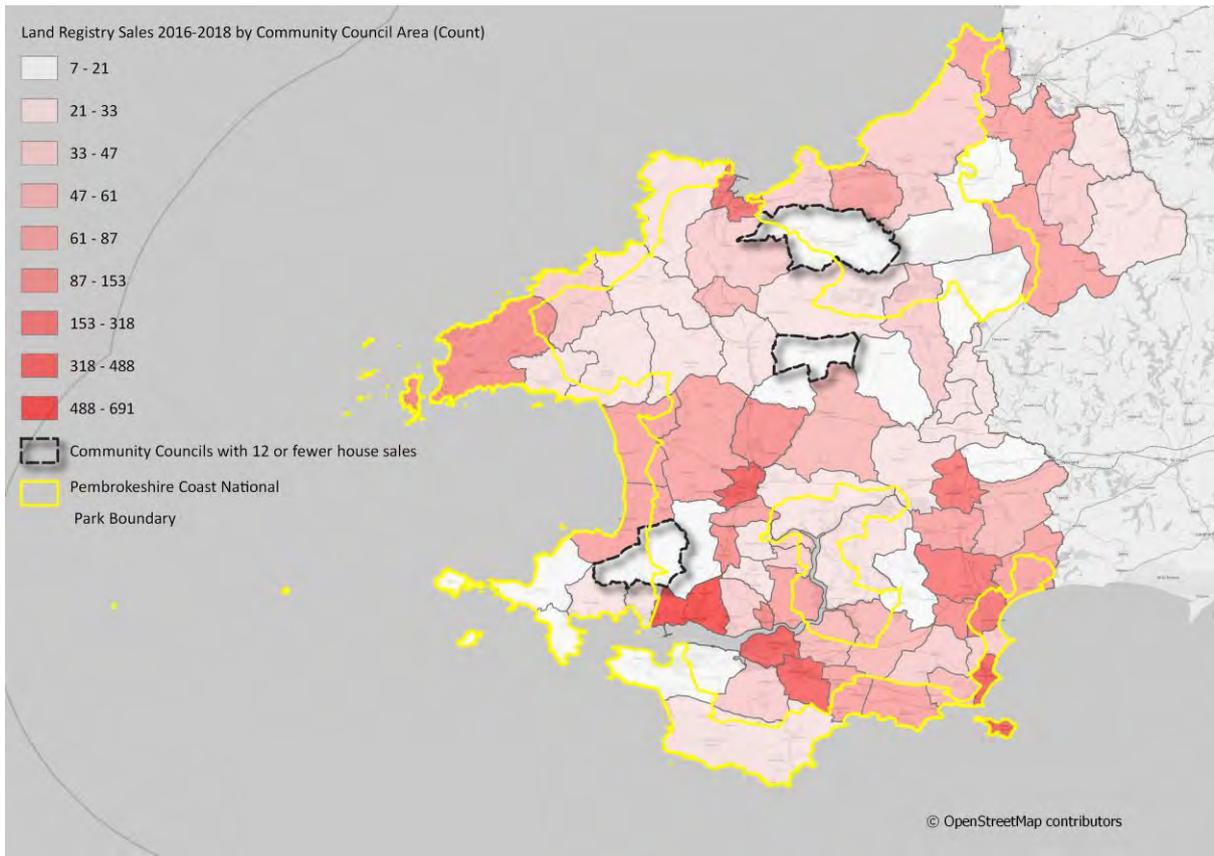
Community Council	Number of transactions	Within National Park?
Ambleston	11	Out
Amroth	74	Partly
Angle	18	Partly
Boncath	39	Out
Brawdy	31	Partly
Burton	84	Partly
Camrose	85	Out
Carew	56	Partly
Cilgerran	78	Out
Clydau	24	Out
Clynderwen	31	Out
Cosheston	51	Partly

Community Council	Number of transactions	Within National Park?
Crymych	68	Partly
Cwm Gwaun	7	Partly
Dale	15	In
Dinas Cross	46	In
East Williamston	113	Out
Eglwysrw	19	Partly
Fishguard & Goodwick	318	Partly
Freystrop	25	Partly
Haverfordwest	488	Out
Hayscastle	23	Partly
Herbrandston	22	In
Hook	47	Partly
Hundleton	47	Out
Jeffreyston	20	Partly
Johnston	107	Out
Kilgetty/Begelly	195	Out
Lampeter Velfrey	61	Out
Lamphey	75	Partly
Letterston	50	Out
Llanddewi Velfrey	19	Out
Llandissilio West	27	Out
Llangwm	40	Partly
Llanrhian	39	Partly
Llanstadwell	43	Out
Llawhaden	24	Partly
Maenclochog	38	Partly
Manorbier	71	In

Community Council	Number of transactions	Within National Park?
Manordeifi	32	Out
Marloes & St Brides	15	In
Martletwy	26	Partly
Mathry	27	Partly
Merlin's Bridge	87	Partly
Milford Haven	691	Partly
Mynachlogddu	18	Partly
Narberth	203	Out
Nevern	47	In
New Moat	15	Out
Newport	77	In
Neyland	153	Out
Nolton & Roch	70	Partly
Pembroke	420	Out
Pembroke Dock	434	Out
Penally	59	Partly
Pencaer	23	Partly
Puncheston	30	Partly
Rosemarket	26	Out
Rudbaxton	97	Out
Saundersfoot	179	In
Scleddau	41	Out
Solva	33	Partly
Spittal	20	Out
St Davids	103	In
St Dogmaels	71	Partly
St Florence	47	Out

Community Council	Number of transactions	Within National Park?
St Ishmaels	29	In
St Mary Out Liberty	46	Partly
Stackpole & Castlemartin	24	In
Templeton	79	Out
Tenby	396	In
The Havens	69	Partly
Tiers Cross	21	Out
Uzmaston, Boulston and Slebech	28	Partly
Walwyns Castle	8	Partly
Wiston	53	Out
Wolfscastle	28	Out

# Map 1 House Sales



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## INCOME AND HOUSE PRICES:

To identify issues with affordability Gwynedd and Anglesey use CACI Paycheck data and Land Registry data to calculate affordability ratios at a ward level, this includes calculating the lower quartile ratio house price to lower quartile salary to inform an indicator on “percentage of people priced out of the market” in a given area.

Swansea Council have used Land Registry data to identify Wards that have higher than average house prices, this is used in conjunction with Census 2011 data on tenure to indicate which Wards have low levels of affordable housing. In addition to these data sets they also employ Census 2011 data on the number of bedrooms in households to show where there are low levels of households with one to two bedrooms and high levels of households with four or more bedrooms.

The tables below have been created using the Annual Survey of Hours and Earnings (ASHE) and 3 years of collated Land Registry Price Paid Data (the years 2016, 2017 and 2018).

Gwynedd and Anglesey used the following as a guide to identifying issues regarding affordability.

- Affordability – the ratio between median house prices and median household incomes (threshold – ratio of 10.0);
- Lower quartile ratio – ratio between lower quartile house prices and lower quartile household incomes (threshold – ratio over 15.0);
- Percentage of people priced out of the housing market – percentage of households that have an income below 3.5 times the lower quartile house price (threshold 80% of households);

Table 3 shows the mean and median average earnings in Pembrokeshire along with earnings by percentile. Percentile earnings are the figure below which that proportion of persons fall e.g. the 10 percentile is the figure below which the 10% lowest earners fall.

Table 3 shows how many times the salary at each statistical point a house would cost by community e.g. in Ambleston the average house would cost 9 times the salary of the lowest 10% of earners.

Banks and building societies in the UK generally lend between three and four and a half times the total annual income of a household, as an indicator Gwynedd and Anglesey use 3.5 times the lower quartile salary.

**Table 2: Average earnings and percentile earnings – Pembrokeshire<sup>1</sup>**

Measure	Salary
Median	£24,824
Mean	£29,961
10 percentile	£14,446
20 percentile	£16,890
25 percentile	£17,841
30 percentile	£18,898
40 percentile	£21,304
60 percentile	£29,534

Highlighted in the table below are those communities that that have a ratio of 10 or more when median wage is compared with median price. Communities both within, partly within and outside the National Park are selected.

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<sup>1</sup> Annual Survey of Hours and Earnings (ASHE) (2018), available from <https://www.nomisweb.co.uk/>

Table 3: Median House Price Affordability Ratios

<b>Community</b>	<b>Median House Price (collated LRPP 2016, 2017 and 2018)</b>	<b>Ratio Price: Median Salary</b>	<b>Ratio Price: Mean Salary</b>	<b>Ratio Price: 10 Percentile Salary</b>	<b>Ratio Price: 20 Percentile Salary</b>	<b>Ratio Price: 25 Percentile Salary</b>	<b>Ratio Price: 30 Percentile</b>	<b>Ratio Price: 60 Percentile Salary</b>	<b>Within National Park?</b>
Ambleston	£135,000	5	5	9	8	8	7	5	Out
Amroth	£230,000	9	8	16	14	13	12	8	Partly
Angle	£243,500	10	8	17	14	14	13	8	Partly
Boncath	£195,000	8	7	13	12	11	10	7	Out
Brawdy	£310,000	12	10	21	18	17	16	10	Partly
Burton	£272,000	11	9	19	16	15	14	9	Partly
Camrose	£223,000	9	7	15	13	12	12	8	Out
Carew	£167,500	7	6	12	10	9	9	6	Partly
Cilgerran	£142,000	6	5	10	8	8	8	5	Out
Clydau	£182,500	7	6	13	11	10	10	6	Out

<b>Community</b>	<b>Median House Price (collated LRPP 2016, 2017 and 2018)</b>	<b>Ratio Price: Median Salary</b>	<b>Ratio Price: Mean Salary</b>	<b>Ratio Price: 10 Percentile Salary</b>	<b>Ratio Price: 20 Percentile Salary</b>	<b>Ratio Price: 25 Percentile Salary</b>	<b>Ratio Price: 30 Percentile</b>	<b>Ratio Price: 60 Percentile Salary</b>	<b>Within National Park?</b>
Clynderwen	£164,000	7	5	11	10	9	9	6	Out
Cosheston	£210,000	8	7	15	12	12	11	7	Partly
Crymych	£160,000	6	5	11	9	9	8	5	Partly
Cwm Gwaun	£204,000	8	7	14	12	11	11	7	Partly
Dale	£251,000	10	8	17	15	14	13	8	In
Dinas Cross	£220,000	9	7	15	13	12	12	7	In
East Williamston	£174,950	7	6	12	10	10	9	6	Out
Eglwysrw	£235,000	9	8	16	14	13	12	8	Partly
Fishguard & Goodwick	£133,125	5	4	9	8	7	7	5	Partly
Freystrop	£178,000	7	6	12	11	10	9	6	Partly
Haverfordwest	£132,500	5	4	9	8	7	7	4	Out
Hayscastle	£205,000	8	7	14	12	11	11	7	Partly
Herbrandston	£160,225	6	5	11	9	9	8	5	In
Hook	£210,000	8	7	15	12	12	11	7	Partly
Hundleton	£183,000	7	6	13	11	10	10	6	Out

<b>Community</b>	<b>Median House Price (collated LRPP 2016, 2017 and 2018)</b>	<b>Ratio Price: Median Salary</b>	<b>Ratio Price: Mean Salary</b>	<b>Ratio Price: 10 Percentile Salary</b>	<b>Ratio Price: 20 Percentile Salary</b>	<b>Ratio Price: 25 Percentile Salary</b>	<b>Ratio Price: 30 Percentile</b>	<b>Ratio Price: 60 Percentile Salary</b>	<b>Within National Park?</b>
Jeffreyston	£247,500	10	8	17	15	14	13	8	Partly
Johnston	£127,000	5	4	9	8	7	7	4	Out
Kilgetty/Begelly	£176,950	7	6	12	10	10	9	6	Out
Lampeter Velfrey	£210,000	8	7	15	12	12	11	7	Out
Lamphey	£165,000	7	6	11	10	9	9	6	Partly
Letterston	£163,500	7	5	11	10	9	9	6	Out
Llanddewi Velfrey	£240,000	10	8	17	14	13	13	8	Out
Llandissilio West	£180,000	7	6	12	11	10	10	6	Out
Llangwm	£157,750	6	5	11	9	9	8	5	Partly
Llanrhian	£225,000	9	8	16	13	13	12	8	Partly
Llanstadwell	£180,000	7	6	12	11	10	10	6	Out
Llawhaden	£246,375	10	8	17	15	14	13	8	Partly
Maenclochog	£141,475	6	5	10	8	8	7	5	Partly
Manorbier	£220,000	9	7	15	13	12	12	7	In
Manordeifi	£198,000	8	7	14	12	11	10	7	Out

<b>Community</b>	<b>Median House Price (collated LRPP 2016, 2017 and 2018)</b>	<b>Ratio Price: Median Salary</b>	<b>Ratio Price: Mean Salary</b>	<b>Ratio Price: 10 Percentile Salary</b>	<b>Ratio Price: 20 Percentile Salary</b>	<b>Ratio Price: 25 Percentile Salary</b>	<b>Ratio Price: 30 Percentile</b>	<b>Ratio Price: 60 Percentile Salary</b>	<b>Within National Park?</b>
Marloes & St Brides	£242,500	10	8	17	14	14	13	8	In
Martletwy	£268,998	11	9	19	16	15	14	9	Partly
Mathry	£215,000	9	7	15	13	12	11	7	Partly
Merlin's Bridge	£130,000	5	4	9	8	7	7	4	Partly
Milford Haven	£109,995	4	4	8	7	6	6	4	Partly
Mynachlogddu	£236,250	10	8	16	14	13	13	8	Partly
Narberth	£160,000	6	5	11	9	9	8	5	Out
Nevern	£275,000	11	9	19	16	15	15	9	In
New Moat	£230,000	9	8	16	14	13	12	8	Out
Newport	£300,000	12	10	21	18	17	16	10	In
Neyland	£115,000	5	4	8	7	6	6	4	Out
Nolton & Roch	£208,500	8	7	14	12	12	11	7	Partly
Pembroke	£160,000	6	5	11	9	9	8	5	Out
Pembroke Dock	£112,000	5	4	8	7	6	6	4	Out
Penally	£250,000	10	8	17	15	14	13	8	Partly

<b>Community</b>	<b>Median House Price (collated LRPP 2016, 2017 and 2018)</b>	<b>Ratio Price: Median Salary</b>	<b>Ratio Price: Mean Salary</b>	<b>Ratio Price: 10 Percentile Salary</b>	<b>Ratio Price: 20 Percentile Salary</b>	<b>Ratio Price: 25 Percentile Salary</b>	<b>Ratio Price: 30 Percentile</b>	<b>Ratio Price: 60 Percentile Salary</b>	<b>Within National Park?</b>
Pencaer	£300,000	12	10	21	18	17	16	10	Partly
Puncheston	£245,000	10	8	17	15	14	13	8	Partly
Rosemarket	£160,000	6	5	11	9	9	8	5	Out
Rudbaxton	£185,000	7	6	13	11	10	10	6	Out
Saundersfoot	£220,000	9	7	15	13	12	12	7	In
Scleddau	£128,000	5	4	9	8	7	7	4	Out
Solva	£260,000	10	9	18	15	15	14	9	Partly
Spittal	£142,750	6	5	10	8	8	8	5	Out
St Davids	£250,000	10	8	17	15	14	13	8	In
St Dogmaels	£169,000	7	6	12	10	9	9	6	Partly
St Florence	£220,000	9	7	15	13	12	12	7	Out
St Ishmaels	£163,000	7	5	11	10	9	9	6	In
St Mary Out Liberty	£232,625	9	8	16	14	13	12	8	Partly
Stackpole & Castlemartin	£262,500	11	9	18	16	15	14	9	In

<b>Community</b>	<b>Median House Price (collated LRPP 2016, 2017 and 2018)</b>	<b>Ratio Price: Median Salary</b>	<b>Ratio Price: Mean Salary</b>	<b>Ratio Price: 10 Percentile Salary</b>	<b>Ratio Price: 20 Percentile Salary</b>	<b>Ratio Price: 25 Percentile Salary</b>	<b>Ratio Price: 30 Percentile</b>	<b>Ratio Price: 60 Percentile Salary</b>	<b>Within National Park?</b>
Templeton	£196,000	8	7	14	12	11	10	7	Out
Tenby	£185,500	7	6	13	11	10	10	6	In
The Havens	£225,000	9	8	16	13	13	12	8	Partly
Tiers Cross	£213,000	9	7	15	13	12	11	7	Out
Uzmaston, Boulston and Slebech	£187,500	8	6	13	11	11	10	6	Partly
Walwyns Castle	£172,500	7	6	12	10	10	9	6	Partly
Wiston	£183,000	7	6	13	11	10	10	6	Out
Wolfscastle	£255,975	10	9	18	15	14	14	9	Out

# Map 2 Median House Price & Median Salary

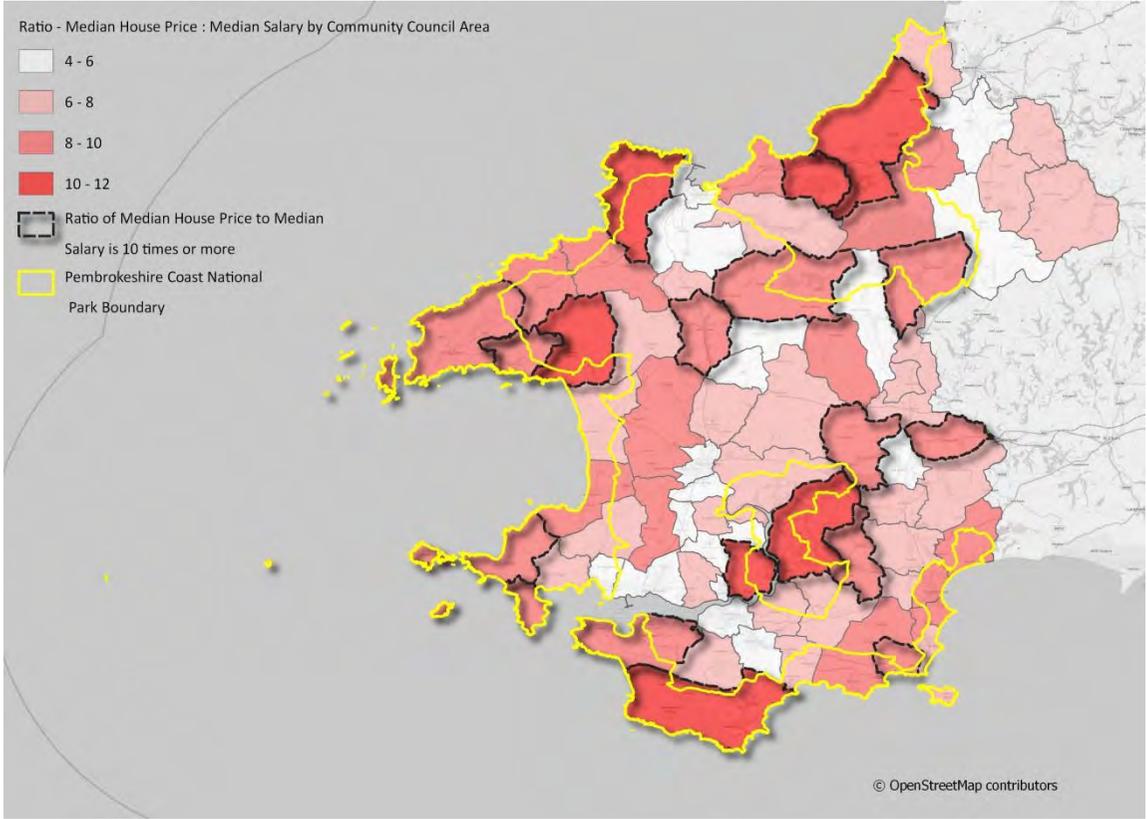


Table 4: Ratio of 25 Percentile House Price to 25 Percentile Gross Annual Salary – ratio between lower quartile house prices and lower quartile household incomes (threshold – ratio over 15.0) None selected – highest is 12.

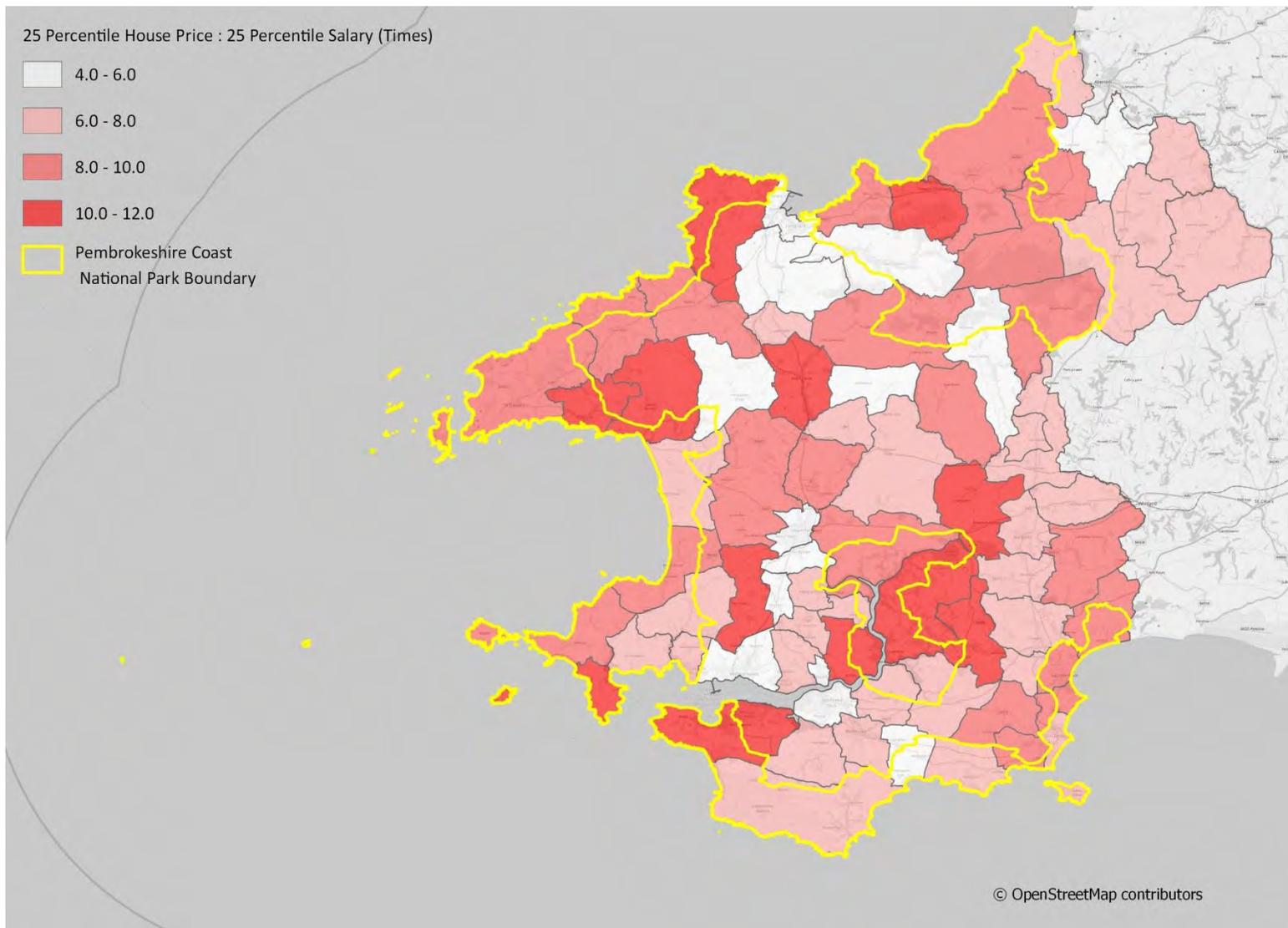
<b>Community</b>	<b>25 Percentile</b>	<b>Ratio - 25 percentile Price:25 Percentile Gross Annual Salary</b>	<b>Within National Park?</b>
Ambleston	£110,000	6	Out
Amroth	£151,750	9	Partly
Angle	£187,588	11	Partly
Boncath	£150,000	8	Out
Brawdy	£193,750	11	Partly
Burton	£199,213	11	Partly
Camrose	£165,000	9	Out
Carew	£138,625	8	Partly
Cilgerran	£112,750	6	Out
Clydau	£137,250	8	Out
Clynderwen	£133,500	7	Out
Cosheston	£150,345	8	Partly
Crymych	£130,000	7	Partly
Cwm Gwaun	£68,750	4	Partly
Dale	£200,000	11	In
Dinas Cross	£157,750	9	In
East Williamston	£144,000	8	Out
Eglwysrw	£175,000	10	Partly
Fishguard & Goodwick	£92,250	5	Partly
Freystrop	£136,000	8	Partly

<b>Community</b>	<b>25 Percentile</b>	<b>Ratio - 25 percentile Price:25 Percentile Gross Annual Salary</b>	<b>Within National Park?</b>
Haverfordwest	£100,000	6	Out
Hayscastle	£115,750	6	Partly
Herbrandston	£135,500	8	In
Hook	£174,750	10	Partly
Hundleton	£147,500	8	Out
Jeffreyston	£212,250	12	Partly
Johnston	£110,500	6	Out
Kilgetty/Begelly	£148,000	8	Out
Lampeter Velfrey	£175,000	10	Out
Lamphey	£80,000	4	Partly
Letterston	£120,000	7	Out
Llanddewi Velfrey	£128,250	7	Out
Llandissilio West	£133,000	7	Out
Llangwm	£130,000	7	Partly
Llanrhian	£177,500	10	Partly
Llanstadwell	£138,250	8	Out
Llawhaden	£191,563	11	Partly
Maenclochog	£85,625	5	Partly
Manorbier	£150,000	8	In
Manordeifi	£143,750	8	Out
Marloes & St Brides	£162,500	9	In
Martletwy	£206,250	12	Partly
Mathry	£155,000	9	Partly
Merlin's Bridge	£102,250	6	Partly
Milford Haven	£86,000	5	Partly

<b>Community</b>	<b>25 Percentile</b>	<b>Ratio - 25 percentile Price:25 Percentile Gross Annual Salary</b>	<b>Within National Park?</b>
Mynachlogddu	£184,500	10	Partly
Narberth	£121,500	7	Out
Nevern	£162,500	9	In
New Moat	£173,500	10	Out
Newport	£215,000	12	In
Neyland	£92,500	5	Out
Nolton & Roch	£142,625	8	Partly
Pembroke	£123,875	7	Out
Pembroke Dock	£85,000	5	Out
Penally	£173,000	10	Partly
Pencaer	£192,500	11	Partly
Puncheston	£154,500	9	Partly
Rosemarket	£124,625	7	Out
Rudbaxton	£157,950	9	Out
Saundersfoot	£170,000	10	In
Scleddau	£95,000	5	Out
Solva	£195,000	11	Partly
Spittal	£129,500	7	Out
St Davids	£186,975	10	In
St Dogmaels	£143,000	8	Partly
St Florence	£153,000	9	Out
St Ishmaels	£140,000	8	In
St Mary Out Liberty	£181,250	10	Partly
Stackpole & Castlemartin	£134,125	8	In

<b>Community</b>	<b>25 Percentile</b>	<b>Ratio - 25 percentile Price:25 Percentile Gross Annual Salary</b>	<b>Within National Park?</b>
Templeton	£141,500	8	Out
Tenby	£125,000	7	In
The Havens	£173,000	10	Partly
Tiers Cross	£189,000	11	Out
Uzmaston, Boulston and Slebech	£170,750	10	Partly
Walwyns Castle	£118,750	7	Partly
Wiston	£135,000	8	Out
Wolfscastle	£193,250	11	Out

Map 3 25 Percentile House Price: 25 Percentile Salary (Times)

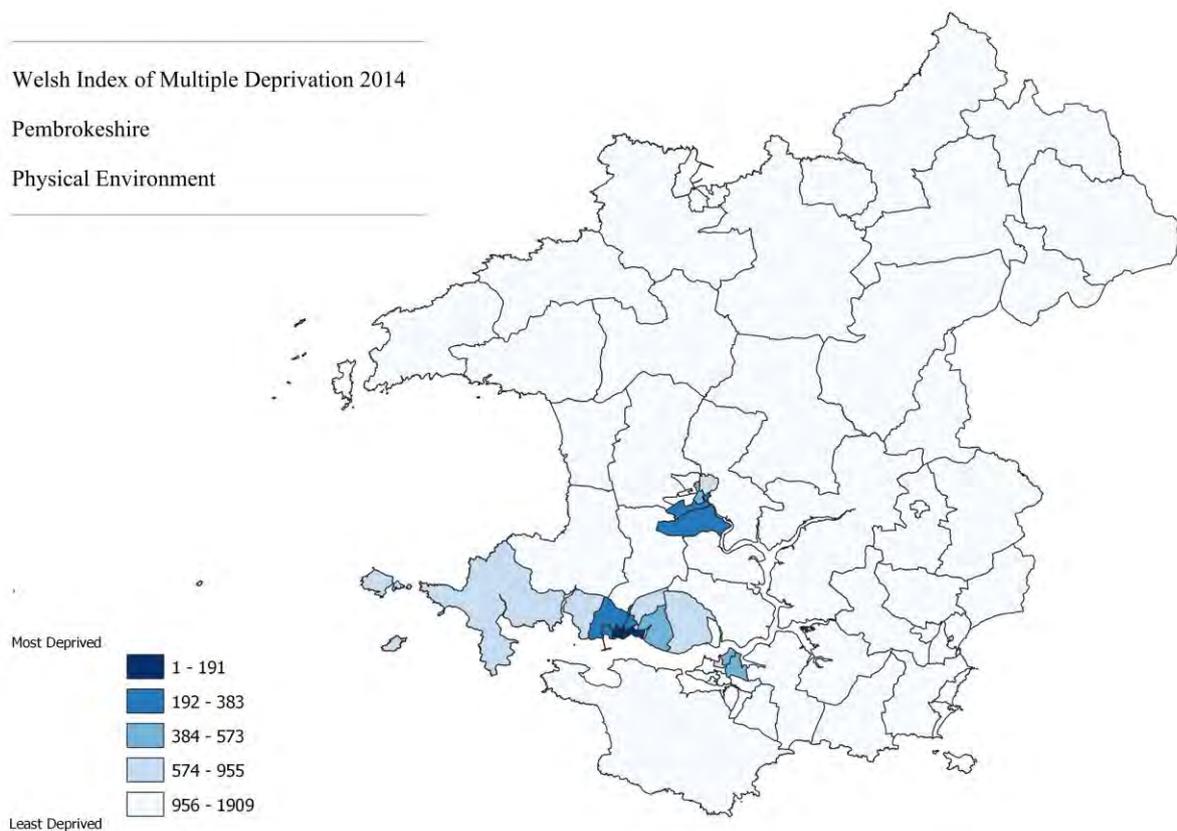


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## ENVIRONMENTAL QUALITY

Gwynedd and Anglesey have used Land Registry data and WIMD in their analysis of housing markets, looking at the average prices, number of transactions and the link between environmental quality (in WIMD) and house prices.

The Physical Environment Domain of WIMD concerns air quality, flood risk and proximity of industrial/waste disposal sites. Map 4 below shows that the physical environment is generally not an issue for Pembrokeshire and the National Park.



## HOUSING NEED AND TENURE

**Table 5: Housing Tenure and Need<sup>2</sup> by Community Council**

Community	All households (number)	Shared ownership (part owned and part rented) (%)	Social rented (total) (%)	Total affordable (%)	Affordable Housing Need per year	Affordable housing need per year as a proportion of all households (%)	Within National Park?
Ambleston	137	0.0	6.6	6.6	4.5	3.3	Out
Amroth	546	0.5	4.0	4.5	18.7	3.4	Partly
Angle	151	0.0	13.9	13.9	5.8	3.8	Partly
Boncath	317	1.6	2.8	4.4	10.1	3.2	Out
Brawdy	255	0.0	17.6	17.6	11.1	4.4	Partly
Burton	503	0.0	3.0	3.0	14.7	2.9	Partly
Camrose	735	0.3	6.3	6.6	24.0	3.3	Out
Carew	612	0.3	6.4	6.7	19.0	3.1	Partly
Cilgerran	653	0.3	6.7	7.0	19.2	2.9	Out
Clydau	294	0.3	1.4	1.7	10.7	3.6	Out
Clynderwen	386	0.5	11.7	12.2	10.9	2.8	Out
Cosheston	336	0.3	3.6	3.9	11.6	3.5	Partly
Crymych	720	0.6	7.9	8.5	16.9	2.3	Partly
Cwm Gwaun	123	0.0	10.6	10.6	3.9	3.2	Partly
Dale	104	0.0	11.5	11.5	3.7	3.6	In
Dinas Cross	383	0.8	7.6	8.4	11.8	3.1	In
East Williamston	781	0.5	7.3	7.8	22.0	2.8	Out
Eglwysrw	303	0.0	6.9	6.9	9.9	3.3	Partly
Fishguard and Goodwick	2,528	0.2	14.2	14.4	84.5	3.3	Partly
Freystrop	261	0.8	11.1	11.9	8.3	3.2	Partly
Haverfordwest	5,396	0.3	19.7	20.0	173.9	3.2	Out

<sup>2</sup> Local Housing Market Assessment, Pembrokeshire County Council (2014)

Community	All households (number)	Shared ownership (part owned and part rented) (%)	Social rented (total) (%)	Total affordable (%)	Affordable Housing Need per year	Affordable housing need per year as a proportion of all households (%)	Within National Park?
Hayscastle	186	1.1	4.3	5.4	6.2	3.3	Partly
Herbrandston	163	0.0	8.0	8.0	4.3	2.6	In
Hook	330	0.3	12.7	13.0	6.8	2.1	Partly
Hundleton	359	0.0	4.2	4.2	11.7	3.3	Out
Jeffreyston	226	0.9	4.4	5.3	7.9	3.5	Partly
Johnston	780	0.1	17.4	17.5	23.9	3.1	Out
Kilgetty/Begelly	955	0.5	9.7	10.2	29.4	3.1	Out
Lampeter Velfrey	473	0.2	2.7	2.9	15.7	3.3	Out
Lamphey	404	0.2	9.7	9.9	6.1	1.5	Partly
Letterston	540	0.4	19.4	19.8	14.7	2.7	Out
Llanddewi Velfrey	161	0.0	3.7	3.7	6.2	3.9	Out
Llandissilio West	206	0.5	11.7	12.2	6.2	3.0	Out
Llangwm	370	0.0	8.1	8.1	11.6	3.1	Partly
Llanrhian	403	0.7	11.2	11.9	12.3	3.1	Partly
Llanstadwell	380	0.3	7.4	7.7	13.4	3.5	Out
Llawhaden	248	0.0	4.0	4.0	8.9	3.6	Partly
Maenclochog	331	0.3	1.5	1.8	9.8	3.0	Partly
Manorbier	578	0.5	18.2	18.7	21.7	3.8	In
Manordeifi	234	0.0	3.4	3.4	7.3	3.1	Out
Marloes and St. Brides	139	0.0	12.9	12.9	4.7	3.4	In
Martletwy	231	0.4	2.6	3.0	8.7	3.8	Partly
Mathry	245	0.8	6.1	6.9	9.7	4.0	Partly
Merlin's Bridge	888	0.2	31.8	32.0	30.6	3.4	Partly
Milford Haven	6,144	0.2	28.0	28.2	203.0	3.3	Partly
Mynachlog-Ddu	213	0.0	1.9	1.9	2.1	1.0	Partly
Narberth	1,121	0.2	13.5	13.7	41.1	3.7	Out

Community	All households (number)	Shared ownership (part owned and part rented) (%)	Social rented (total) (%)	Total affordable (%)	Affordable Housing Need per year	Affordable housing need per year as a proportion of all households (%)	Within National Park?
Nevern	354	0.0	4.2	4.2	11.9	3.4	In
New Moat	167	0.6	1.8	2.4	6.3	3.8	Out
Newport	583	0.5	16.5	17.0	23.6	4.0	In
Neyland	1,540	0.2	22.4	22.6	53.6	3.5	Out
Nolton and Roch	353	0.8	2.8	3.6	9.8	2.8	Partly
Pembroke	3,345	0.1	26.4	26.5	124.4	3.7	Out
Pembroke Dock	4,171	0.2	21.6	21.8	121.0	2.9	Out
Penally	385	0.0	7.5	7.5	5.5	1.4	Partly
Pencaer	204	0.0	5.4	5.4	6.5	3.2	Partly
Puncheston	230	0.0	4.8	4.8	6.1	2.7	Partly
Rosemarket	249	0.0	11.6	11.6	7.6	3.1	Out
Rudbaxton	338	0.0	2.1	2.1	11.7	3.5	Out
Saundersfoot	1,200	0.0	7.2	7.2	44.9	3.7	In
Scleddau	411	0.2	16.5	16.7	10.3	2.5	Out
Solva	391	0.5	20.2	20.7	15.1	3.9	Partly
Spittal	194	0.0	3.6	3.6	4.2	2.2	Out
St. David's and the Cathedral Close	851	0.5	13.6	14.1	34.2	4.0	In
St. Dogmaels	662	0.6	7.3	7.9	19.7	3.0	Partly
St. Florence	298	0.3	11.4	11.7	8.2	2.8	Out
St. Ishmael's	206	0.0	12.1	12.1	6.7	3.3	In
St. Mary Out Liberty	366	0.3	16.7	17.0	14.8	4.0	Partly
Stackpole and Castlemartin	281	0.4	17.1	17.5	11.4	4.1	In
Templeton	407	0.0	4.7	4.7	13.3	3.3	Out
Tenby	2,253	0.3	16.2	16.5	88.4	3.9	In
The Havens	515	0.2	6.8	7.0	16.3	3.2	Partly
Tiers Cross	205	1.0	6.8	7.8	6.6	3.2	Out

<b>Community</b>	<b>All households (number)</b>	<b>Shared ownership (part owned and part rented) (%)</b>	<b>Social rented (total) (%)</b>	<b>Total affordable (%)</b>	<b>Affordable Housing Need per year</b>	<b>Affordable housing need per year as a proportion of all households (%)</b>	<b>Within National Park?</b>
Uzmaston, Boulston and Slebech	307	0.0	1.3	1.3	10.5	3.4	Partly
Walwyn's Castle	122	0.0	10.7	10.7	3.9	3.2	Partly
Wiston	443	0.0	9.9	9.9	14.5	3.3	Out
Wolfscastle	259	0.4	10.0	10.4	8.9	3.4	Out

**Table 6: Affordable housing need per year as a proportion of all households**

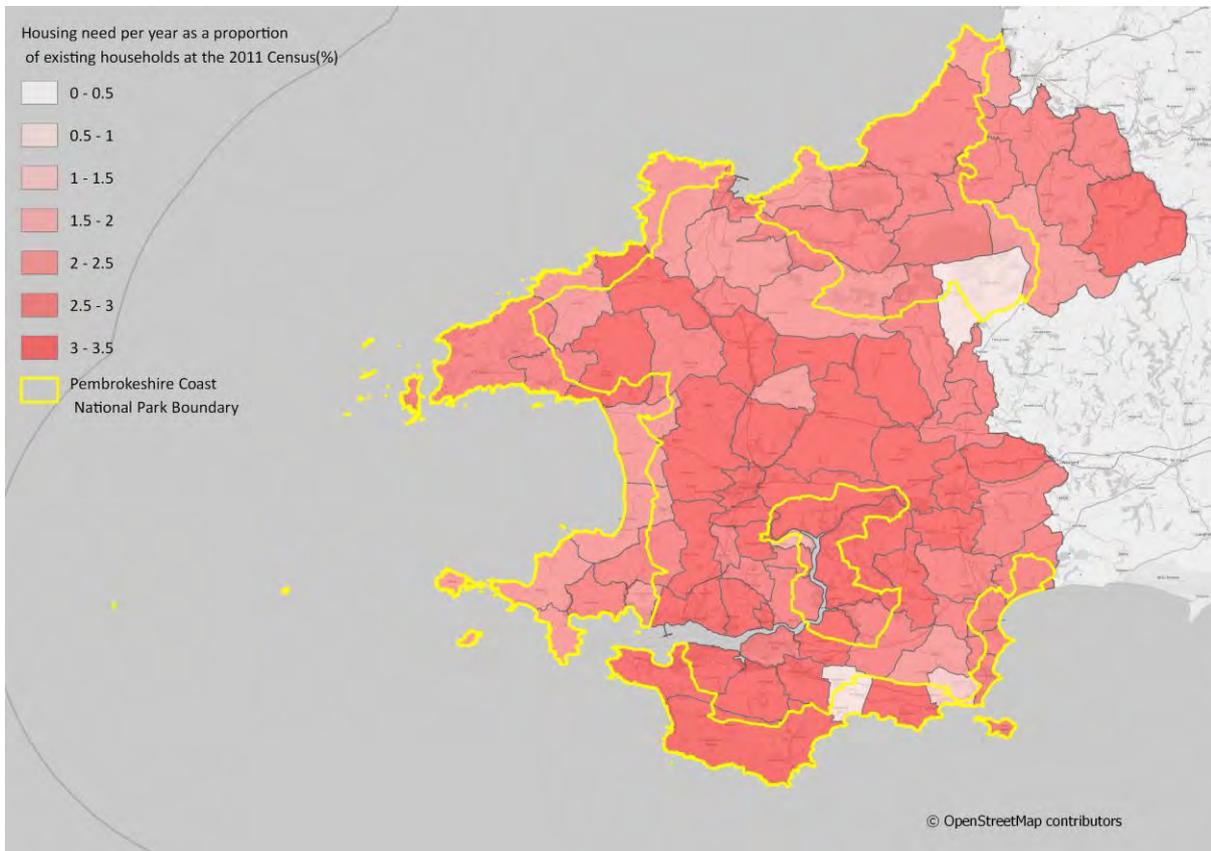
<b>Community</b>	Affordable housing need per year as a proportion of all households (%)	Within National Park?
Ambleston	3.3	Out
Amroth	3.4	Partly
Angle	3.8	Partly
Boncath	3.2	Out
Brawdy	4.4	Partly
Burton	2.9	Partly
Camrose	3.3	Out
Carew	3.1	Partly
Cilgerran	2.9	Out
Clydau	3.6	Out
Clynderwen	2.8	Out
Cosheston	3.5	Partly
Crymych	2.3	Partly
Cwm Gwaun	3.2	Partly
Dale	3.6	In
Dinas Cross	3.1	In
East Williamston	2.8	Out
Eglwysrw	3.3	Partly
Fishguard and Goodwick	3.3	Partly
Freystrop	3.2	Partly
Haverfordwest	3.2	Out
Hayscastle	3.3	Partly
Herbrandston	2.6	In

<b>Community</b>	Affordable housing need per year as a proportion of all households (%)	Within National Park?
Hook	2.1	Partly
Hundleton	3.3	Out
Jeffreyston	3.5	Partly
Johnston	3.1	Out
Kilgetty/Begelly	3.1	Out
Lampeter Velfrey	3.3	Out
Lamphey	1.5	Partly
Letterston	2.7	Out
Llanddewi Velfrey	3.9	Out
Llandissilio West	3.0	Out
Llangwm	3.1	Partly
Llanrhian	3.1	Partly
Llanstadwell	3.5	Out
Llawhaden	3.6	Partly
Maenclochog	3.0	Partly
Manorbier	3.8	In
Manordeifi	3.1	Out
Marloes and St. Brides	3.4	In
Martletwy	3.8	Partly
Mathry	4.0	Partly
Merlin's Bridge	3.4	Partly
Milford Haven	3.3	Partly
Mynachlog-Ddu	1.0	Partly
Narberth	3.7	Out
Nevern	3.4	In
New Moat	3.8	Out

<b>Community</b>	Affordable housing need per year as a proportion of all households (%)	Within National Park?
Newport	4.0	In
Neyland	3.5	Out
Nolton and Roch	2.8	Partly
Pembroke	3.7	Out
Pembroke Dock	2.9	Out
Penally	1.4	Partly
Pencaer	3.2	Partly
Puncheston	2.7	Partly
Rosemarket	3.1	Out
Rudbaxton	3.5	Out
Saundersfoot	3.7	In
Scleddau	2.5	Out
Solva	3.9	Partly
Spittal	2.2	Out
St. David's and the Cathedral Close	4.0	In
St. Dogmaels	3.0	Partly
St. Florence	2.8	Out
St. Ishmael's	3.3	In
St. Mary Out Liberty	4.0	Partly
Stackpole and Castlemartin	4.1	In
Templeton	3.3	Out
Tenby	3.9	In
The Havens	3.2	Partly
Tiers Cross	3.2	Out
Uzmaston, Boulston and Slebech	3.4	Partly
Walwyn's Castle	3.2	Partly

Community	Affordable housing need per year as a proportion of all households (%)	Within National Park?
Wiston	3.3	Out
Wolfscastle	3.4	Out

Map 5 showing Housing Need per Year 2014 Local Housing Market Assessment as a proportion of Existing Households.



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## AFFORDABLE HOUSING STOCK

Swansea Council advises in its evidence background paper<sup>3</sup> that at the time of the 2011 Census, there were a much lower proportion of affordable housing in certain wards than the Swansea average (7.4% compared with 19.5%).

As a comparator the tables below show where communities have less than half the proportion of affordable housing than the Pembrokeshire average of 16%<sup>4</sup>.

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<sup>3</sup> Page 18 Statement of Swansea Council arising from Hearing 4 March 2018

<sup>4</sup> Census 2011 Table: QS405EW - Tenure – Households (Pembrokeshire)

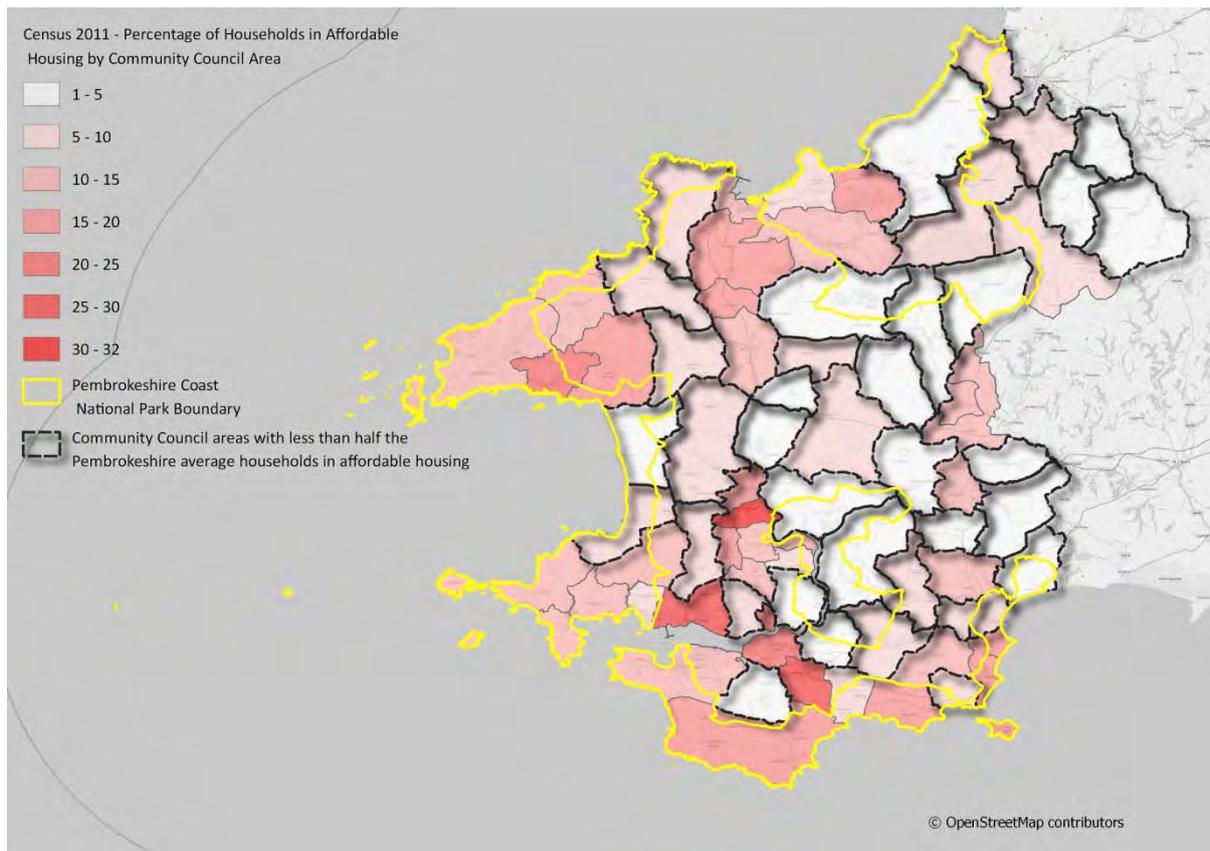
**Table 7: Percentage of households in affordable housing – under 8% highlighted.**

Community	Total affordable (%)	Within National Park?
Ambleston	6.6	Out
Amroth	4.5	Partly
Angle	13.9	Partly
Boncath	4.4	Out
Brawdy	17.6	Partly
Burton	3.0	Partly
Camrose	6.6	Out
Carew	6.7	Partly
Cilgerran	7.0	Out
Clydau	1.7	Out
Clynderwen	12.2	Out
Cosheston	3.9	Partly
Crymych	8.5	Partly
Cwm Gwaun	10.6	Partly
Dale	11.5	In
Dinas Cross	8.4	In
East Williamston	7.8	Out
Eglwysrwr	6.9	Partly
Fishguard and Goodwick	14.4	Partly
Freystrop	11.9	Partly
Haverfordwest	20.0	Out
Hayscastle	5.4	Partly
Herbrandston	8.0	In
Hook	13.0	Partly

<b>Community</b>	<b>Total affordable (%)</b>	<b>Within National Park?</b>
Hundleton	4.2	Out
Jeffreyston	5.3	Partly
Johnston	17.5	Out
Kilgetty/Begelly	10.2	Out
Lampeter Velfrey	2.9	Out
Lamphey	9.9	Partly
Letterston	19.8	Out
Llanddewi Velfrey	3.7	Out
Llandissilio West	12.2	Out
Llangwm	8.1	Partly
Llanrhian	11.9	Partly
Llanstadwell	7.7	Out
Llawhaden	4.0	Partly
Maenclochog	1.8	Partly
Manorbier	18.7	In
Manordeifi	3.4	Out
Marloes and St. Brides	12.9	In
Martletwy	3.0	Partly
Mathry	6.9	Partly
Merlin's Bridge	32.0	Partly
Milford Haven	28.2	Partly
Mynachlog-Ddu	1.9	Partly
Narberth	13.7	Out
Nevern	4.2	In
New Moat	2.4	Out
Newport	17.0	In
Neyland	22.6	Out

<b>Community</b>	<b>Total affordable (%)</b>	<b>Within National Park?</b>
Nolton and Roch	3.6	Partly
Pembroke	26.5	Out
Pembroke Dock	21.8	Out
Penally	7.5	Partly
Pencaer	5.4	Partly
Puncheston	4.8	Partly
Rosemarket	11.6	Out
Rudbaxton	2.1	Out
Saundersfoot	7.2	In
Scleddau	16.7	Out
Solva	20.7	Partly
Spittal	3.6	Out
St. David's and the Cathedral Close	14.1	In
St. Dogmaels	7.9	Partly
St. Florence	11.7	Out
St. Ishmael's	12.1	In
St. Mary Out Liberty	17.0	Partly
Stackpole and Castlemartin	17.5	In
Templeton	4.7	Out
Tenby	16.5	In
The Havens	7.0	Partly
Tiers Cross	7.8	Out
Uzmaston, Boulston and Slebech	1.3	Partly
Walwyn's Castle	10.7	Partly
Wiston	9.9	Out
Wolfscastle	10.4	Out

## Map 6 Affordable Housing in Communities



## BEDROOM SIZE:

Swansea Council has employed Census 2011 data on the number of bedrooms in households to show where there are low levels of households with one to two bedrooms and high levels of households with four or more bedrooms.

The communities highlighted were those that had twice the Swansea average of 4+ bedrooms and for 2 or fewer bedrooms the average for Swansea was compared by highlighting lower percentages in certain communities (i.e. for Swansea it was an estimated 33% of properties overall on average versus 25% or less for certain communities).

**Table 8: Dwelling Size: Households with 4 or more Bedrooms**

Highlighted cells indicate Communities with 44% of households having four or more bedrooms (twice the Pembrokeshire average 22%<sup>5</sup>).

Community	4 bedrooms+	Within the National Park?
Ambleston	40%	Out
Amroth	31%	Partly
Angle	19%	Partly
Boncath	28%	Out
Brawdy	26%	Partly
Burton	51%	Partly
Camrose	37%	Out
Carew	29%	Partly
Cilgerran	25%	Out
Clydau	33%	Out
Clynderwen	30%	Out
Cosheston	43%	Partly
Crymych	27%	Partly

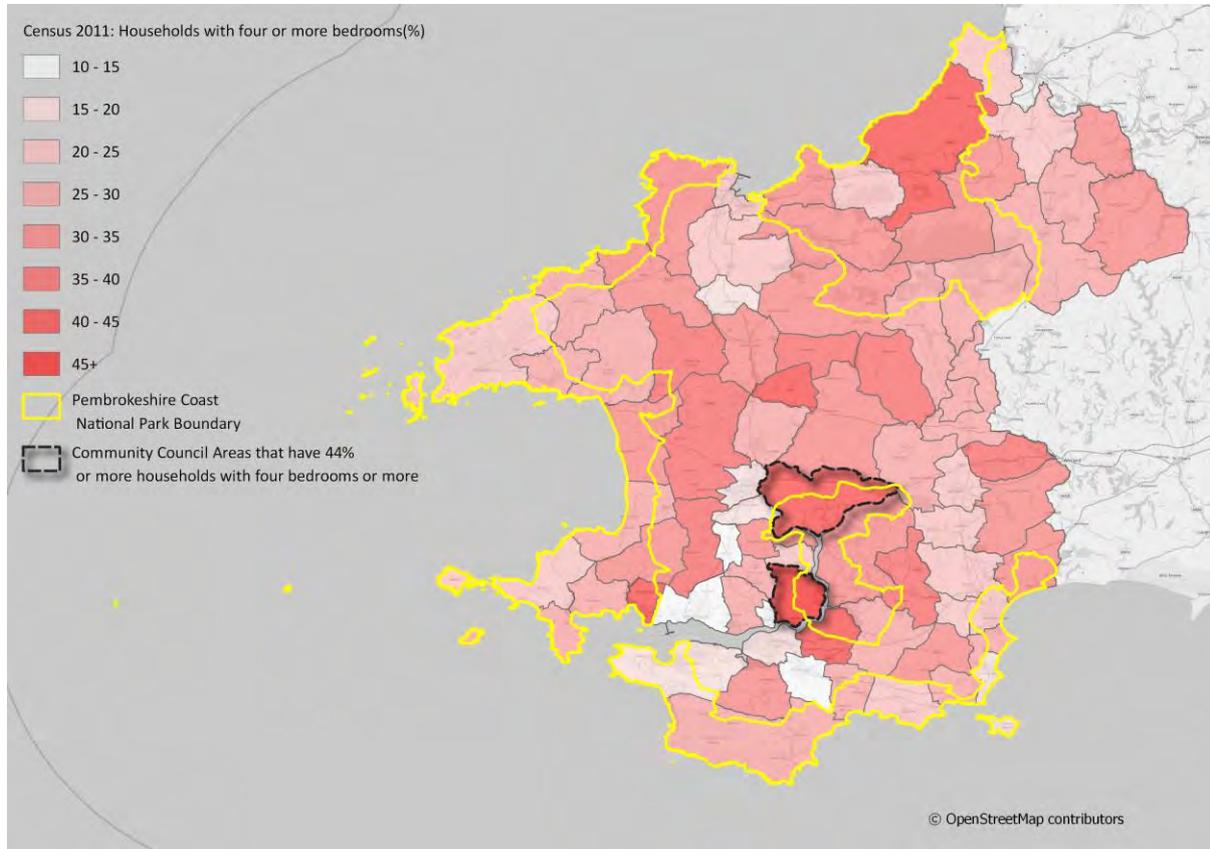
<sup>5</sup> Census 2011 Table QS411EW – Number of Bedrooms (Pembrokeshire)

Community	4 bedrooms+	Within the National Park?
Cwm Gwaun	34%	Partly
Dale	29%	In
Dinas Cross	31%	In
East Williamston	23%	Out
Eglwysrw	35%	Partly
Fishguard and Goodwick	21%	Partly
Freystrop	34%	Partly
Haverfordwest	16%	Out
Hayscastle	38%	Partly
Herbrandston	43%	In
Hook	31%	Partly
Hundleton	33%	Out
Jeffreyston	37%	Partly
Johnston	15%	Out
Kilgetty/Begelly	21%	Out
Lampeter Velfrey	35%	Out
Lamphey	26%	Partly
Letterston	17%	Out
Llanddewi Velfrey	36%	Out
Llandissilio West	28%	Out
Llangwm	25%	Partly
Llanrhian	30%	Partly
Llanstadwell	30%	Out
Llawhaden	28%	Partly
Maenclochog	26%	Partly
Manorbier	23%	In
Manordeifi	32%	Out

Community	4 bedrooms+	Within the National Park?
Marloes and St. Brides	25%	In
Martletwy	34%	Partly
Mathry	32%	Partly
Merlin's Bridge	17%	Partly
Milford Haven	13%	Partly
Mynachlog-Ddu	27%	Partly
Narberth	21%	Out
Nevern	41%	In
New Moat	37%	Out
Newport	25%	In
Neyland	15%	Out
Nolton and Roch	33%	Partly
Pembroke	15%	Out
Pembroke Dock	17%	Out
Penally	28%	Partly
Pencaer	32%	Partly
Puncheston	33%	Partly
Rosemarket	29%	Out
Rudbaxton	30%	Out
Saundersfoot	24%	In
Scleddau	24%	Out
Solva	26%	Partly
Spittal	42%	Out
St. David's and the Cathedral Close	25%	In
St. Dogmaels	23%	Partly
St. Florence	35%	Out

Community	4 bedrooms+	Within the National Park?
St. Ishmael's	27%	In
St. Mary Out Liberty	28%	Partly
Stackpole and Castlemartin	27%	In
Templeton	24%	Out
Tenby	17%	In
The Havens	30%	Partly
Tiers Cross	40%	Out
Uzmaston, Boulston and Slebech	44%	Partly
Walwyn's Castle	34%	Partly
Wiston	34%	Out
Wolfscastle	32%	Out

## Map 7 Households with 4 or more bedrooms



**Table 9: Dwelling Size: Households with 2 or fewer Bedrooms**

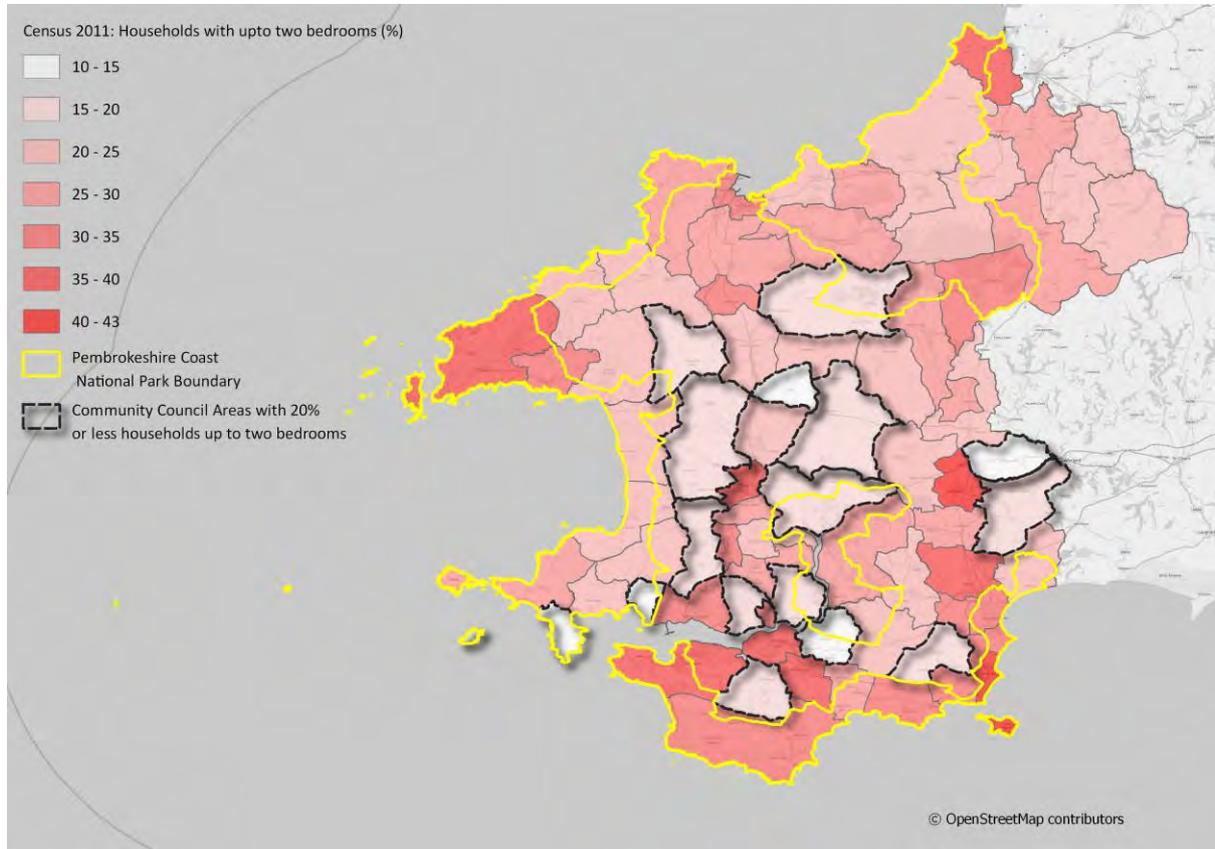
(Highlighted cells indicate Communities with 20% of households with two bedrooms or fewer)

Community/Town/City Council 2011	Up to 2 bedrooms	Within the National Park?
Ambleston	25%	Out
Amroth	25%	Partly
Angle	36%	Partly
Boncath	23%	Out
Brawdy	25%	Partly
Burton	16%	Partly
Camrose	20%	Out
Carew	23%	Partly
Cilgerran	26%	Out
Clydau	21%	Out
Clynderwen	25%	Out
Cosheston	15%	Partly
Crymych	28%	Partly
Cwm Gwaun	26%	Partly
Dale	15%	In
Dinas Cross	25%	In
East Williamston	33%	Out
Eglwysrw	22%	Partly
Fishguard and Goodwick	33%	Partly
Freystrop	22%	Partly
Haverfordwest	36%	Out
Hayscastle	16%	Partly
Herbrandston	13%	In

Hook	24%	Partly
Hundleton	17%	Out
Jeffreyston	23%	Partly
Johnston	31%	Out
Kilgetty/Begelly	37%	Out
Lampeter Velfrey	19%	Out
Lamphey	30%	Partly
Letterston	32%	Out
Llanddewi Velfrey	14%	Out
Llandissilio West	27%	Out
Llangwm	30%	Partly
Llanrhian	25%	Partly
Llanstadwell	17%	Out
Llawhaden	22%	Partly
Maenclochog	30%	Partly
Manorbier	33%	In
Manordeifi	21%	Out
Marloes and St. Brides	29%	In
Martletwy	27%	Partly
Mathry	24%	Partly
Merlin's Bridge	29%	Partly
Milford Haven	32%	Partly
Mynachlog-Ddu	31%	Partly
Narberth	41%	Out
Nevern	21%	In
New Moat	24%	Out
Newport	30%	In
Neyland	32%	Out

Nolton and Roch	24%	Partly
Pembroke	37%	Out
Pembroke Dock	39%	Out
Penally	31%	Partly
Pencaer	27%	Partly
Puncheston	20%	Partly
Rosemarket	26%	Out
Rudbaxton	24%	Out
Saundersfoot	34%	In
Scleddau	26%	Out
Solva	33%	Partly
Spittal	14%	Out
St. David's and the Cathedral Close	36%	In
St. Dogmaels	36%	Partly
St. Florence	18%	Out
St. Ishmael's	25%	In
St. Mary Out Liberty	31%	Partly
Stackpole and Castlemartin	31%	In
Templeton	26%	Out
Tenby	43%	In
The Havens	25%	Partly
Tiers Cross	16%	Out
Uzmaston, Boulston and Slebech	18%	Partly
Walwyn's Castle	23%	Partly
Wiston	20%	Out
Wolfscastle	24%	Out

## Map 8 Households with up to 2 bedrooms



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## HOUSEHOLDS WITH 'NO USUAL RESIDENT'<sup>6</sup>:

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### DEFINITIONS:

The 2011 Census defines a “household space” as accommodation used or available for use by an individual household. For the purposes of the Census household spaces are identified as having at least one usual resident or as having no usual resident<sup>6</sup>.

Household spaces that have no usual resident are not simply vacant household spaces they can be vacant or used as a second home or holiday homes.

(Ranked by percentage)

(Highlighted cells indicate communities that have 25% or greater households with no usual resident)

Table 10 No Usual Resident

<b>Community</b>	<b>Percent no usual resident</b>	<b>Within the National Park?</b>
Lamphey	48.2	Partly
Newport	37.3	In
The Havens	35.5	Partly
Dale	33.3	In
Marloes & St Brides	31.9	In
Dinas Cross	29.5	In
Saundersfoot	28.6	In
Pencaer	28.4	Partly
St Mary Out Liberty	28.1	Partly
St Davids	26.9	In
Llanrhian	26.5	Partly
Nolton & Roch	26	Partly

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<sup>6</sup> A household space with no usual residents may still be used by short-term residents, visitors who were present on census night, or a combination of short-term residents and visitors.

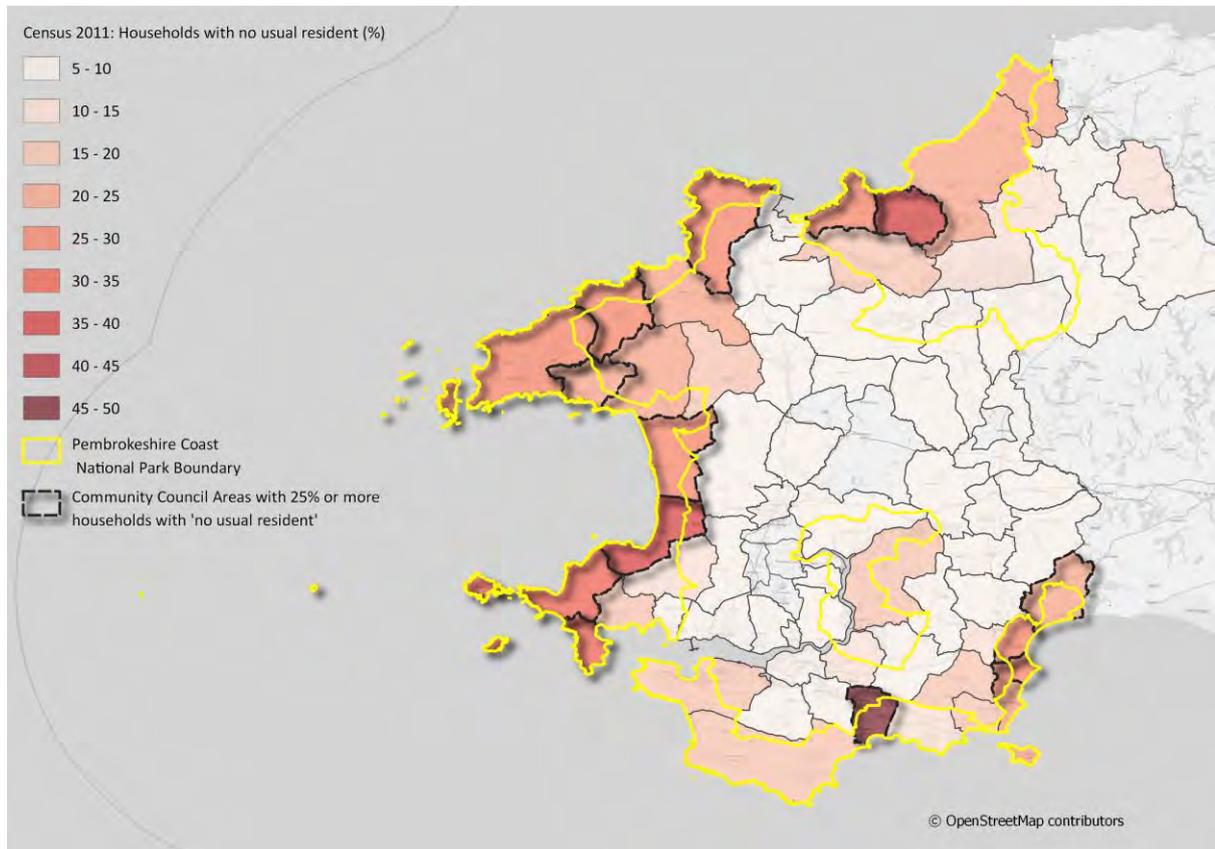
Vacant household spaces, and household spaces that are used as second addresses, are also classified in census results as 'household spaces with no usual residents'.

<b>Community</b>	<b>Percent no usual resident</b>	<b>Within the National Park?</b>
Amroth	25.3	Partly
Solva	25.2	Partly
Tenby	24.5	In
Brawdy	24.3	Partly
Nevern	22	In
Mathry	21.2	Partly
St Dogmaels	20.6	Partly
St Ishmaels	20.2	In
Stackpole & Castlemartin	19.3	In
Angle	18.4	Partly
Penally	17.6	Partly
Martletwy	17.2	Partly
Cwm Gwaun	16.3	Partly
St Florence	16.3	Out
Hayscastle	16.2	Partly
Eglwysrw	14.2	Partly
Manorbier	13.6	In
Walwyns Castle	13.5	Partly
Manordeifi	13.3	Out
Cosheston	10.6	Partly
East Williamston	10.6	Out
Lampeter Velfrey	10.4	Out
Fishguard & Goodwick	10.3	Partly
Puncheston	10.2	Partly
Cilgerran	10.1	Out
Llanddewi Velfrey	10.1	Out
Llawhaden	10.1	Partly

<b>Community</b>	<b>Percent no usual resident</b>	<b>Within the National Park?</b>
Clydau	9.3	Out
Crymych	9.2	Partly
Llanstadwell	9.1	Out
Maenclochog	9.1	Partly
Carew	8.2	Partly
Mynachlogddu	8.2	Partly
Ambleston	8.1	Out
Wolfscastle	7.8	Out
Boncath	7.6	Out
Camrose	7.5	Out
Llangwm	7.5	Partly
Pembroke	7.4	Out
Pembroke Dock	7.4	Out
Scleddau	7.4	Out
Haverfordwest	7.1	Out
Jeffreyston	7	Partly
Herbrandston	6.9	In
Kilgetty/Begelly	6.9	Out
Clynderwen	6.8	Out
Hundleton	6.8	Out
New Moat	6.7	Out
Letterston	6.6	Out
Tiers Cross	6.4	Out
Burton	6.2	Partly
Templeton	6	Out
Narberth	5.9	Out
Uzmaston, Boulston and Slebech	5	Partly

<b>Community</b>	<b>Percent no usual resident</b>	<b>Within the National Park?</b>
Milford Haven	4.9	Partly
Neyland	4.9	Out
Rudbaxton	4.8	Out
Spittal	4.4	Out
Freystrop	3.7	Partly
Johnston	3.7	Out
Llandissilio West	3.7	Out
Wiston	3.7	Out
Hook	3.5	Partly
Rosemarket	3.1	Out
Merlin's Bridge	2.2	Partly

## Map 9 Households with no Usual Resident



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## COUNCIL TAX DATA

For Anglesey and Gwynedd the Council selected Council Tax bands where the percentage of houses in highest bands G,H,I (threshold – more than 10%);

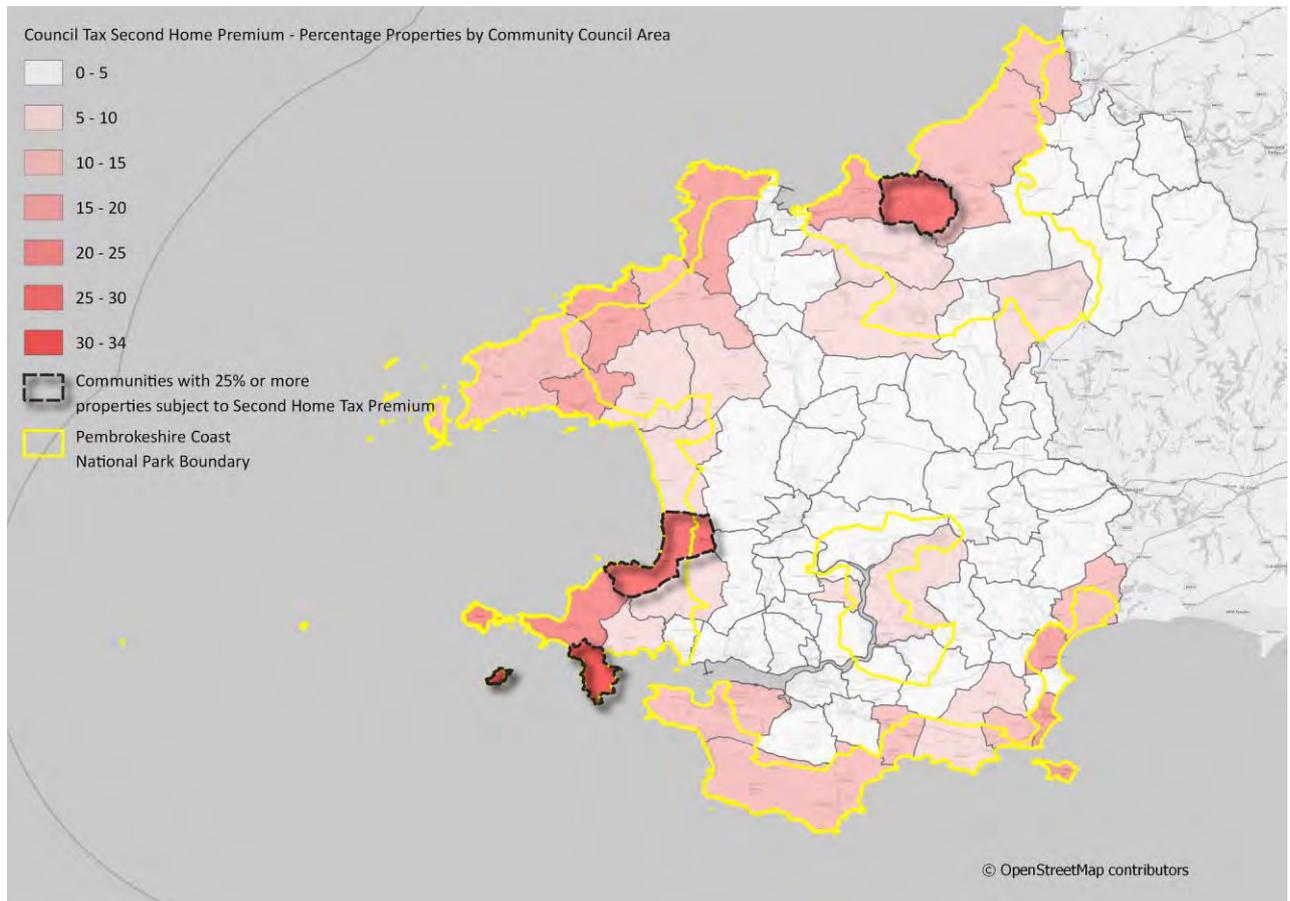
Table 11 Council Tax

Community	All homes on Council Tax database including all homes subject to a second home council tax premium, a discount and those exempt from council tax (eg empty or awaiting structural repair)	Homes subject to 50% second homes council tax premium. These figures do not include those homes which are exempt from the premium (mainly second homes occupied seasonally due to occupation)	Column C as a percentage of Column B	Properties classified as a holiday let (not Ctax but on the NDR database)	Column E as a percentage of Column B	Sub-total of column F. Estimate of Holiday homes that were/would be in Ctax bands A - F	Sub-total of column F. Estimate of Holiday homes that were/would be in Ctax bands G - I	Sub-total of column C. Second homes in Ctax bands A - F	Sub-total of column C. Second homes in Ctax bands G - I
Dale	146	49	34%	17	12%	16	1	44	5
The Havens	735	213	29%	113	15%	105	8	193	20
Caldey	23	6	26%	0	0%	0	0	6	0
Newport	745	190	26%	104	14%	97	7	146	44
Marloes & St Brides	194	45	23%	21	11%	20	1	45	0
Saundersfoot	1541	291	19%	156	10%	145	11	257	34
Solva	478	90	19%	57	12%	53	4	85	5
Tenby	2745	462	17%	302	11%	281	21	411	51
Pencaer	237	39	16%	36	15%	33	3	38	1
Dinas Cross	475	77	16%	43	9%	40	3	64	13
Llanrhian	494	77	16%	74	15%	69	5	74	3
Amroth	704	107	15%	55	8%	51	4	102	5
St Davids & Cathedral Close	1033	157	15%	125	12%	116	9	144	13
Mathry	293	42	14%	27	9%	25	2	41	1
St Dogmaels	784	112	14%	50	6%	46	4	112	0
Angle	199	27	14%	9	5%	8	1	26	1
Nevern	441	59	13%	45	10%	42	3	50	9
Lamphey	732	89	12%	86	12%	80	6	87	2
Stackpole & Castlemartin	325	39	12%	26	8%	24	2	37	2
Penally	457	49	11%	43	9%	40	3	44	5
Brawdy	353	36	10%	29	8%	27	2	33	3
St Ishmaels	246	23	9%	14	6%	13	1	23	0
Martletwy	283	26	9%	11	4%	10	1	24	2
Nolton & Roch	512	47	9%	56	11%	52	4	45	2
Manorbier	646	57	9%	48	7%	45	3	54	3
Hayscastle	220	17	8%	12	5%	11	1	16	1
Cwm Gwaun	126	9	7%	14	11%	13	1	8	1
Mynachlogddu	232	16	7%	5	2%	5	0	16	0
Walwyns Castle	136	9	7%	7	5%	7	0	9	0
Llangwm	408	25	6%	8	2%	7	1	24	1
St Florence	386	23	6%	20	5%	19	1	20	3
Puncheston	253	14	6%	7	3%	7	0	14	0
East Williamston	927	49	5%	8	1%	7	1	49	0
Cilgerran	729	38	5%	7	1%	7	0	36	2

Community	All homes on Council Tax database including all homes subject to a second home council tax premium, a discount and those exempt from council tax (eg empty or awaiting structural repair)	Homes subject to 50% second homes council tax premium. These figures do not include those homes which are exempt from the premium (mainly second homes occupied seasonally due to occupation)	Column C as a percentage of Column B	Properties classified as a holiday let (not Ctax but on the NDR database)	Column E as a percentage of Column B	Sub-total of column F. Estimate of Holiday homes that were/would be in Ctax bands A - F	Sub-total of column F. Estimate of Holiday homes that were/would be in Ctax bands G - I	Sub-total of column C. Second homes in Ctax bands A - F	Sub-total of column C. Second homes in Ctax bands G - I
Eglwysrw	350	18	5%	13	4%	12	1	18	0
Llawhaden	293	15	5%	8	3%	7	1	15	0
St Mary Out Liberty	313	16	5%	6	2%	6	0	15	1
Manordeifi	261	13	5%	6	2%	6	0	12	1
Fishguard & Goodwick	2775	125	5%	44	2%	41	3	123	2
Maenclochog	351	15	4%	9	3%	8	1	15	0
Hundleton	370	15	4%	6	2%	6	0	15	0
Carew	681	26	4%	17	2%	16	1	23	3
Cosheston	373	14	4%	5	1%	5	0	12	2
Templeton	489	18	4%	6	1%	6	0	17	1
Herbrandston	191	7	4%	3	2%	3	0	7	0
Wolfscastle	292	10	3%	6	2%	6	0	10	0
Llanddewi Velfrey	183	6	3%	0	0%	0	0	6	0
Lampeter Velfrey	523	17	3%	19	4%	18	1	16	1
Spittal	218	7	3%	3	1%	3	0	5	2
New Moat	188	6	3%	3	2%	3	0	6	0
Wiston	503	16	3%	5	1%	5	0	16	0
Llanstadwell	418	13	3%	4	1%	4	0	13	0
Clydau	324	10	3%	7	2%	7	0	9	1
Burton	574	17	3%	9	2%	8	1	15	2
Kilgetty/Begelly	1087	32	3%	12	1%	11	1	32	0
Camrose	853	25	3%	10	1%	9	1	25	0
Jeffreyston	242	7	3%	8	3%	7	1	7	0
Boncath	350	10	3%	5	1%	5	0	10	0
Crymych	867	23	3%	13	1%	12	1	23	0
Pembroke	3867	99	3%	22	1%	20	2	98	1
Scleddau	479	12	3%	10	2%	9	1	12	0
Clynderwen	415	10	2%	3	1%	3	0	9	1
Letterston	591	14	2%	3	1%	3	0	14	0
Narberth	1385	32	2%	9	1%	8	1	32	0
Neyland	1675	35	2%	5	0%	5	0	33	2
Rudbaxton	610	12	2%	1	0%	1	0	12	0
Ambleston	153	3	2%	2	1%	2	0	2	1
Llandissilio West	222	4	2%	4	2%	4	0	4	0
Tiers Cross	234	4	2%	4	2%	4	0	4	0
Pembroke Dock	4679	78	2%	11	0%	10	1	77	1

Community	All homes on Council Tax database including all homes subject to a second home council tax premium, a discount and those exempt from council tax (eg empty or awaiting structural repair)	Homes subject to 50% second homes council tax premium. These figures do not include those homes which are exempt from the premium (mainly second homes occupied seasonally due to occupation)	Column C as a percentage of Column B	Properties classified as a holiday let (not Ctax but on the NDR database)	Column E as a percentage of Column B	Sub-total of column F. Estimate of Holiday homes that were/would be in Ctax bands A - F	Sub-total of column F. Estimate of Holiday homes that were/would be in Ctax bands G - I	Sub-total of column C. Second homes in Ctax bands A - F	Sub-total of column C. Second homes in Ctax bands G - I
Freystrop	252	4	2%	2	1%	2	0	3	1
Haverfordwest	5825	83	1%	7	0%	7	0	82	1
Milford Haven	6967	98	1%	11	0%	10	1	96	2
Hook	392	4	1%	2	1%	2	0	4	0
Uzmaston Boulston & Slebech	333	3	1%	4	1%	4	0	3	0
Johnston	909	8	1%	2	0%	2	0	8	0
Rosemarket	240	2	1%	3	1%	3	0	2	0
Merlins Bridge	984	4	0%	0	0%	0	0	4	0
Grand Total	61519	3599		1967		1834	133	3341	258

## Map 10 Second Home Premium



<b>Community</b>	<b>Bands G - I</b>	<b>Bands A - F</b>	<b>Total</b>	<b>Properties in bands G-I (%)</b>
Ambleston	12	141	153	8
Amroth	77	627	704	11
Angle	7	192	199	4
Boncath	10	340	350	3
Brawdy	25	328	353	7
Burton	93	481	574	16
Camrose	70	783	853	8
Carew	48	633	681	7
Cilgerran	31	698	729	4
Clydau	12	312	324	4
Clynderwen	14	401	415	3
Cosheston	59	314	373	16
Crymych	8	859	867	1
Cwm Gwaun	3	123	126	2
Dale	19	127	146	13
Dinas Cross	50	425	475	11
East Williamston	38	889	927	4
Eglwysrwr	13	337	350	4
Fishguard & Goodwick	68	2707	2775	2
Freystrop	19	233	252	8
Haverfordwest	60	5765	5825	1
Hayscastle	13	207	220	6
Herbrandston	3	188	191	2
Hook	10	382	392	3

Hundleton	7	363	370	2
Jeffreyston	17	225	242	7
Johnston	6	903	909	1
Kilgetty/Begelly	35	1052	1087	3
Lampeter Velfrey	30	493	523	6
Lamphey	23	709	732	3
Letterston	10	581	591	2
Llanddewi Velfrey	16	167	183	9
Llandissilio West	9	213	222	4
Llangwm	11	397	408	3
Llanrhian	35	459	494	7
Llanstadwell	16	402	418	4
Llawhaden	21	272	293	7
Maenclochog	7	344	351	2
Manorbier	41	605	646	6
Manordeifi	12	249	261	5
Marloes & St Brides	2	192	194	1
Martletwy	18	265	283	6
Mathry	22	271	293	8
Merlin's Bridge	7	977	984	1
Milford Haven	28	6939	6967	0
Mynachlogddu	4	228	232	2
Narberth	51	1334	1385	4
Nevern	51	390	441	12
New Moat	6	182	188	3

Newport	140	605	745	19
Neyland	18	1657	1675	1
Nolton & Roch	41	471	512	8
Pembroke	29	3838	3867	1
Pembroke Dock	30	4649	4679	1
Penally	41	416	457	9
Pencaer	15	222	237	6
Puncheston	9	244	253	4
Rosemarket	26	214	240	11
Rudbaxton	36	574	610	6
Saundersfoot	129	1412	1541	8
Scleddau	13	466	479	3
Solva	25	453	478	5
Spittal	30	188	218	14
St Davids	78	955	1033	8
St Dogmaels	14	770	784	2
St Florence	52	334	386	13
St Ishmaels	7	239	246	3
St Mary Out Liberty	25	288	313	8
Stackpole & Castlemartin	18	307	325	6
Templeton	22	467	489	4
The Havens	72	663	735	10
Tiers Cross	10	224	234	4
Uzmaston, Boulston and Slebech	28	305	333	8
Walwyns Castle	9	127	136	7

Wiston	33	470	503	7
Wolfscastle	14	278	292	5
Tenby	230	2538	2768	8

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## MIGRATION:

Census 2011 definitions:

The migration estimates provided by the 2011 Census concern those people and households that have moved into an area, in this case the term “area” means “Ward”, within the year preceding the census.

Swansea Council:

In Swansea Council’s LDP Examination Statement on Hearing Session 4 (Affordable Housing – Local Needs Housing and Rural Exception Sites, page 19 paragraph 10<sup>7</sup>) data on migration is used to highlight that the wards of interest, for policy purposes, are attractive to migrants from outside of Swansea and from outside of the UK. Figures are quoted for migrating from within the UK (outside of Swansea) and for migrating from outside of the UK.

Gwynedd and Anglesey:

Topic Paper 17: Local Market Housing<sup>8</sup> includes migration in the context of people born outside of Wales as one of the indicators when identifying the areas relevant to their Local Market Housing Policy.

The National Park Authority is unsure if it is possible to use the Census data for migration to identify the numbers of persons born outside of Wales since the data is divided into “migration within the UK” and “migration from outside the UK”.

The Authority has considered the Census table which identifies the age group of migrants in the year before the Census. Tables comparing wards within or partly within the National Park and the whole of Pembrokeshire show a similar pattern but with older age groups being slightly more prominent for in migration. In outflows all age groups are slightly more prominent for the whole of Pembrokeshire.

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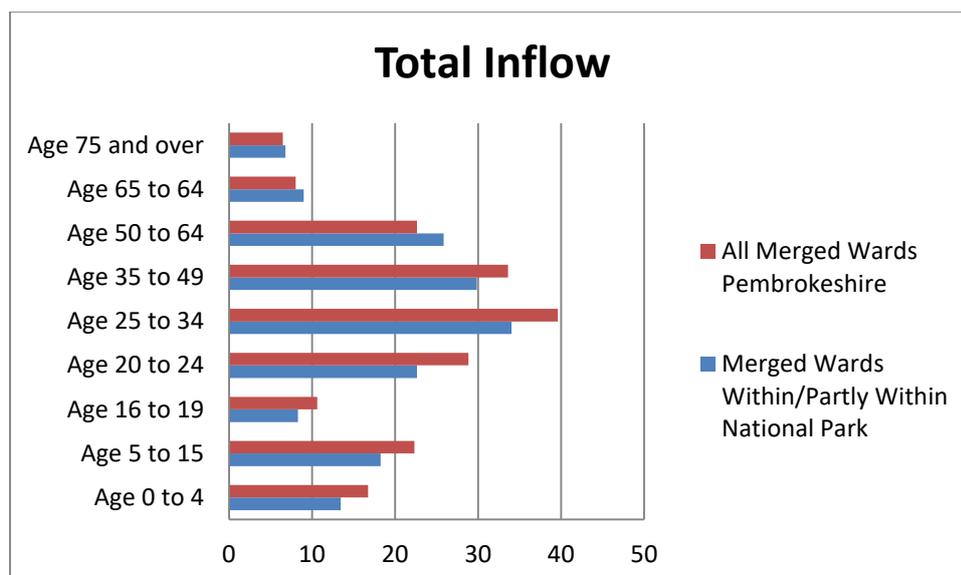
<sup>7</sup> [https://www.swansea.gov.uk/media/25325/ED032-SC-Statement-Policy-H5---Session-4/pdf/ED032\\_SC\\_Statement\\_Policy\\_H5\\_-\\_Session\\_4.pdf](https://www.swansea.gov.uk/media/25325/ED032-SC-Statement-Policy-H5---Session-4/pdf/ED032_SC_Statement_Policy_H5_-_Session_4.pdf)

<sup>8</sup> <https://www.anglesey.gov.uk/documents/Docs-en/Planning/Planning-policy/Local/Supporting/Topic-Paper-17-Local-Market-Housing.pdf>

**Table 12 In/out migration average of merged wards by age<sup>9</sup>**

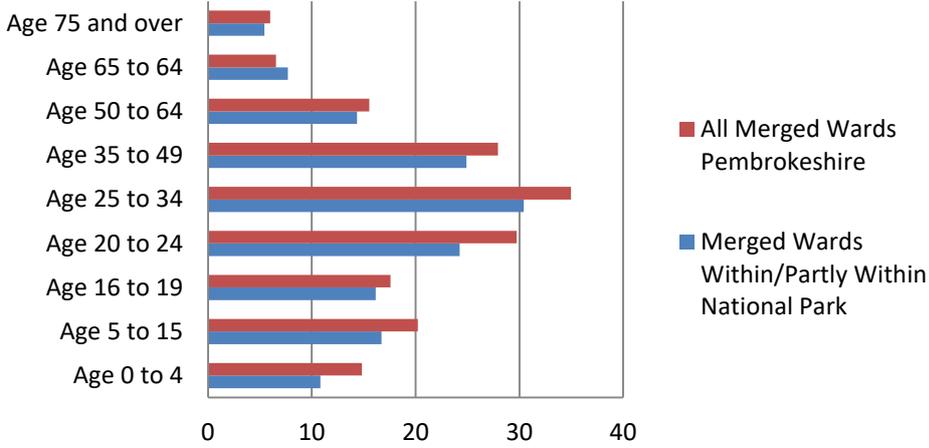
Merged wards within or partly within NP			All merged wards Pembrokeshire		
	Inflow	Outflow		Inflow	Outflow
Age 0 to 4	13	11	Age 0 to 4	17	15
Age 5 to 15	18	17	Age 5 to 15	22	20
Age 16 to 19	8	16	Age 16 to 19	11	18
Age 20 to 24	23	24	Age 20 to 24	29	30
Age 25 to 34	34	30	Age 25 to 34	40	35
Age 35 to 49	30	25	Age 35 to 49	34	28
Age 50 to 64	26	14	Age 50 to 64	23	16
Age 65 to 64	9	8	Age 65 to 64	8	7
Age 75 and over	7	5	Age 75 and over	6	6

Figure 1



<sup>9</sup> Census 2011 Tables UKMIG008 available from <https://www.nomisweb.co.uk>

**Figure 2 Total Outflow**



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## EDUCATION

Gwynedd and Anglesey data/indicators:

Gwynedd and Anglesey refer to empty school places as an indicator of lower numbers of families in the wards of interest.

The Authority contacted the children and schools directorate at Pembrokeshire County Council and asked if there were any existing issues in the county, particularly those schools that have catchments within or partly within the National Park.

The Authority has been advised that there are a number of schools which have catchments within the National Park area. A number of these have, and are likely to continue to have, sufficient spare places to be able to accommodate additional pupil yield from new housing, e.g. St Dogmael's CP, Ysgol Eglwysrwr and Ysgol Llanychllwydog. However, there are other schools that have limited spare capacity and are likely to come under increased pressure from additional housing yield; such schools are Ysgol Penrhyn Dewi VA, Coastlands CP and Lamphey CP. It should be noted that in the case of schools such as Stepside CP, there is likely to be pressure arising from housing developments arising from both the National Park and County Council planning areas.

In short it is not the case that all communities in the National Park are suffering from high numbers of empty school places, indeed some schools may come under pressure from new development within the Park during the plan period.

Table 13 below, describes the relationship between the catchments of the primary school mentioned above and the communities in the National Park.

<b>School</b>	<b>National Park Communities (within or partly within catchment)</b>
Coastlands CP	Dale, Herbrandston, Marloes and St Brides, Milford Haven, St Ishmaels, The Havens, Walwyns Castle
Lamphey CP	Carew, Lamphey, Manorbier, Stackpole & Castlemartin
Saundersfoot CP	Amroth, Saundersfoot, St Mary Out Liberty
St Dogmael's CP	Nevern, St Dogmaels
Stepaside CP	Amroth, Carew, St Mary Out Liberty
Ysgol Bro Ingli	Cwm Gwaun, Dinas Cross, Newport, Nevern
Ysgol Eglwysrwr	Eglwysrwr, Nevern

<b>School</b>	<b>National Park Communities (within or partly within catchment)</b>
Ysgol Llanychllwydog	Cwm Gwaun, Eglwysrwr, Nevern, Newport, Nevern, Puncteston
Ysgol Penrhyn Dewi	Brawdy, Hayscastle, Llanrhian, Mathry, Nolton & Roch, Solva, St David's, The Havens

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## RETAIL STUDY

Town centres in Wales are recognized as being possibly more vulnerable than other parts of the UK because of its lower economic base. This vulnerability is reflected through town centre vacancy rates.<sup>10</sup>

A report from the Local Data Company, based on a study of the leading Welsh towns and cities (69 towns and 4 cities), states that the Welsh shopping centre vacancy rate in 2017 was 13%. Out of all the centres, Milford Haven has the highest vacancy rate in the study of 28.8% and 21% of premises having a persistent vacancy of greater than 3 years, Pembroke had the highest percentage increase in vacancies in 2017 of 13.6% (increasing from 11.4% in 2016 to 25% in 2017).

The average vacancy percentage for Great Britain is 11%.<sup>11</sup>

The Pembrokeshire Coast National Park Authority Local Development Plan Annual Monitoring Report 2018 which details the vacancy rates of the National Park centres gives an average of 4.9% vacant units. A breakdown of vacant floor space percentage by centre is as follows, Newport 3.4%, Saundersfoot 1%, St. Davids 3.5%, Solva 0% and Tenby 8.5%.<sup>12</sup>

Table 14 Health of Centres in the National Park and outside National Park

Location	Number of vacant units (A class)	% of vacant units (A class)	Comparison Goods Expenditure per capita 2016 (£)	Comparison Goods Expenditure per capita Forecast 2031 (£)
Haverfordwest	37	15.3	2,317	3,378
Fishguard	16	16.3	2,771	4,040

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<sup>10</sup> South West Wales Regional Retail Study 2017

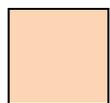
<sup>11</sup> Local Data Company Ltd 2018

<sup>12</sup> Pembrokeshire Coast National Park Authority Annual Monitoring Report 3<sup>rd</sup> October 2018.

Pembroke	8	7	2,368	3,452
Pembroke Dock	20	18.2	*	*
Milford Haven (Historic Centre)	19	18.6	2,212	3,225
Narberth	2	2.2	3,036	4,425
Tenby	17	9.2	2,932	4,275
St. Davids	3	4.9	2,986	4,353
Newport	0	0	3,256	4,747
Saundersfoot	4	6.3	*	*

\* No data available

Source: South West Wales Regional Retail Study. Carter Jonas February 2017



Centres outside National Park boundary



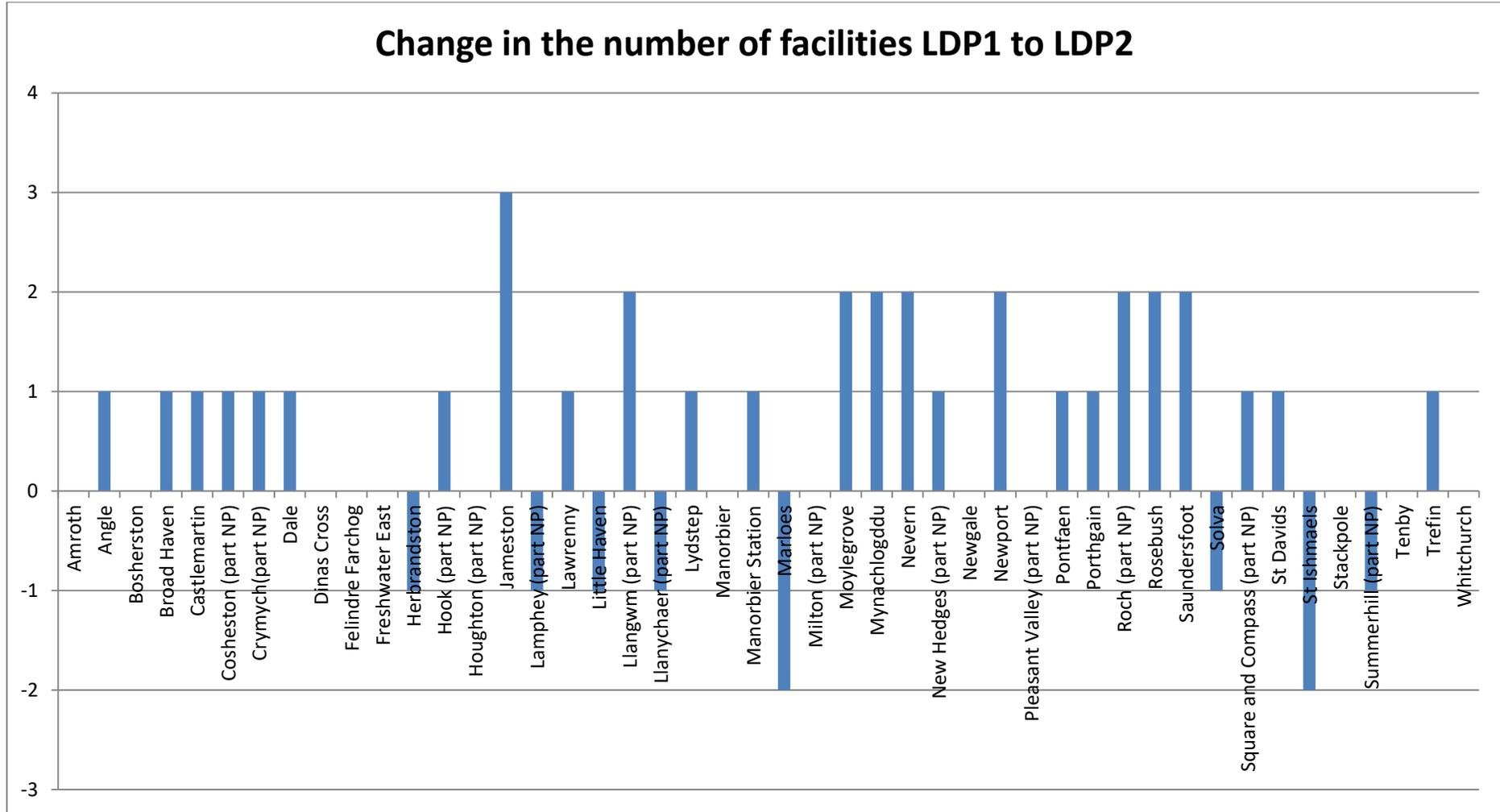
Centres inside National Park boundary

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## COMMUNITY FACILITIES

In the updating of the evidence base for LDP2, comprehensive survey work was undertaken to update any changes in the availability of services and facilities in those settlements defined as 'Rural Centres' in LDP1 and to assess other settlements that had not met previously met the threshold criteria to be defined as such. As can be seen in Figure 3, there have been many changes across the board, with many settlements benefitting from additional facilities and services. Whilst some of these changes are a direct result of improved provision, others arise from existing business evolving, expanding or diversifying to match current needs. This is particularly true of what would generally be considered to meet the needs of visitors, but which are operating now throughout the year as a result of an extended visitor season and to provide for local communities.

## Change in the number of facilities LDP1 to LDP2



## Appendix 3 Policy 47 Joint Unitary Development Plan – Deposit Version

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### Policy 47 Housing in the Pembrokeshire Coast National Park

It is the policy of the Pembrokeshire Coast National Park Authority that new residential development will not be permitted in the National Park unless the applicant demonstrates that the development will meet:

- i) a need for residential accommodation for local person/s, and/or
- ii) an essential need to live within the Sustainable Community.

**In addition the applicant must demonstrate there is no suitable alternative accommodation available within the Sustainable Community. A planning obligation will be secured by agreement, and/or a planning condition imposed, to ensure the occupancy of the dwelling is confined to local persons or those with essential need in perpetuity.**

- 5.4.29 The aim of this policy is to seek to ensure that the limited new housing development opportunities remaining in the National Park are safeguarded to meet the needs of local people. It is also recognised that people who are not necessarily local can have an essential need to live within a Sustainable Community. This policy aim can also help sustain local communities, and the Welsh language in certain areas in the National Park. This policy approach is supported by the first National Park 'purpose' which is to conserve and enhance the natural and built environment of the National Park, coupled with the statutory duty placed upon the National Park Authority to seek to foster the social and economic well being of local communities in pursuing this purpose.
- 5.4.30 The term 'Sustainable Community' refers to those areas shown in Figure 3 and shown on the Proposals Map. For the purposes of this policy the Town and Community Councils of Haverfordwest, Merlins Bridge, Milford Haven, Neyland, Fishguard and Goodwick, Pembroke and Pembroke Dock, and Narberth are excluded from a 'Sustainable Community'. There are twenty-six

Sustainable Communities in the County of Pembrokeshire. Many of these communities extend from the National Park into central Pembrokeshire.

- 5.4.31 When submitting a planning application applicants will need to determine if the site is located in the National Park. This policy only applies in the National Park. If the site lies within the National Park then the applicant will need to determine what Sustainable Community the site lies within. Justifying building a new unit of residential accommodation relies on using the Sustainable Community within which the site is located to support the applicant's case. The applicant must demonstrate that the development will be occupied by a person who is local and in need, or by proving a person has an essential need to live there provided that in each case no suitable alternative accommodation is available. A 'local' person will be:

- A person who has immediately preceding the submission of the planning application occupied a permanent residence for a minimum of three years in the Sustainable Community; and/or
- A person who has a strong local connection with the Sustainable Community.

Examples of what could be regarded as a 'local connection' could include family associations, previous periods of residency and /or employment within the Sustainable Community. In addition to being a local person a prospective occupier of a new dwelling must also qualify as being in 'need', through:

- Living in accommodation which is overcrowded, or otherwise unsatisfactory; and/or
- Forming a household for the first time.

The term 'otherwise unsatisfactory' could include circumstances where the property is no longer capable of meeting the needs of the occupants (e.g. it is too large).

It is also recognised that a person may not be 'local', or in 'need', as set out above but still qualify for a new dwelling on the following basis:

- That he/she has permanent employment within the Sustainable Community; and/or
- That he/she has an essential need to live close to another person who has a minimum of 3 years residence in the Sustainable Community, the essential need arising from age or infirmity.

- 5.4.32 When submitting an application the applicant will be expected to demonstrate that the availability of properties in the Sustainable Community has been examined. For instance there may be Council, Housing Association or private sector properties available or known to be likely to become available, which are of a size and type to be suitable. Where a suitable property is available, new buildings are unlikely to be approved.

- 5.4.33 Any permission granted will be conditioned to ensure that the first occupant and subsequent occupants of the accommodation fully comply with one or more of the criteria set out in paragraph [5.4.31](#). Planning permissions under this policy are granted to meet an identified need and if satisfactory progress is not considered to have been made in implementing the permission then it is unlikely that a renewal of permission will be granted.

- 5.4.34 The NPA will use the National Assembly for Wales Pattern Book for Housing Association Developments to assist in its understanding of whether an existing house is overcrowded. On this basis "overcrowding" will occur where the external living space available for the number of occupants quoted below is less than the area stated.

- Two persons (1 bedroom) 52 square metres
- Three persons (2 bedrooms) 67 square metres
- Four persons (2 bedroom) 92 square metres
- Four persons (3 bedroom) 97.5 square metres
- Five persons (3 bedroom) 104 square metres
- Six persons (4 bedrooms) 120 square metres
- Seven persons (4 bedrooms) 129 square metres

- 5.4.35 The 'cascade approach' advocated in TAN 2 (National Assembly Technical Advice Note 2 'Planning and Affordable Housing', November 1996) will be applied in order to ensure that occupancy is restricted to people meeting local needs criteria. Where a dwelling subject to this occupancy restriction is advertised for sale the dwelling must be offered for sale over a sustained period (minimum of 6 months) at a price to reflect the occupancy restriction set out in paragraph three above. Provision will be made by condition and/or in the Section 106 Agreement to ensure that prior to any relaxation of the restrictions the property must have been advertised for sale and effectively marketed, subject to the restriction, at a realistic price. On submission of appropriate evidence to the NPA, i.e., that it has been marketed in such a manner, and it has not proved possible to find an appropriate purchaser, the NPA will prepare a certificate to this effect authorising the property to be occupied by persons from the adjoining sustainable communities. Town and Community Council areas named in paragraph [5.4.30](#) above will be excluded at this stage.
- 5.4.36 Should no person who can qualify for occupancy in this wider area come forward within a minimum of 3 months, the search for a suitable occupant can be widened to the whole of Pembrokeshire (again for 3 months), and finally without restriction. In each case the procedure detailed in paragraph [5.4.35](#) will need to be followed. In the event of a subsequent re-sale the prospective new occupier will need to demonstrate compliance with paragraph [5.4.31](#) in accordance with the terms of the original restrictions imposed.
- 5.4.37 The occupation of the dwelling shall be limited to the person qualifying under the above policy, or the widow or widower of such a person or any resident dependants.
- 5.4.38 Where a number of dwellings are proposed a Local Housing Needs Survey would be required and the results should accompany the application, the survey either having been undertaken by the applicant to an agreed methodology, or through the NPA at the applicant's expense. Further guidance on the preparation of the applicant's housing needs survey will be provided in supplementary planning guidance.
- 5.4.39 This policy will also be used to determine what is regarded as local needs for the National Park under policies [Policy 40](#) [Policy 42](#) [Policy 43](#) [Policy 46](#) to [Policy 49](#) and [Policy 58](#)
- 5.4.40 Pembrokeshire County Council has concerns about the appropriateness of this policy.