



Llywodraeth Cymru  
Welsh Government

**PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY**

**JOINT HOUSING LAND AVAILABILITY STUDY 2011**

**BETWEEN PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY  
AND THE STUDY GROUP:**

**PEMBROKESHIRE COUNTY COUNCIL  
HOME BUILDERS' FEDERATION  
PEMBROKESHIRE HOUSING ASSOCIATION  
TY CANTREF  
DWR CYMRU/WELSH WATER**

**AUGUST 2012**

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## 1.0 SUMMARY

- 1.1 This is the Pembrokeshire Coast National Park Authority Joint Housing Land Availability (JHLAS) Study for 2011. It replaces the report for the previous base date of 2010.
- 1.2 This report presents the housing land supply for the area at the base date of 1st April 2011.
- 1.3 The JHLAS has been prepared in accordance with the requirements of *Planning Policy Wales* (Edition 4, February 2011), *Technical Advice Note 1 (TAN 1): Joint Housing Land Availability Studies* and the Guidance Note on the JHLAS process (June 2011). Please refer to these documents for details of the requirements for the maintenance of a five year housing land supply in each Local Planning Authority area and the process for undertaking JHLASs. This document can be accessed on the Welsh Government web site using the following link:

<http://wales.gov.uk/topics/businessandconomy/property/jhlas/?language=en>

- 1.4 Section 2 sets out details of the housing land supply and how it has been calculated. It shows that based on the residual method set out in TAN 1, Pembrokeshire Coast National Park Authority has **3.8 years** housing land supply.

### Involvement

- 1.5 The housing land supply has been assessed in consultation with:

Home Builders Federation  
Pembrokeshire County Council  
Pembrokeshire Housing Association  
Ty Cantref  
Dwr Cymru/Welsh Water

### Report production

- 1.6 Pembrokeshire Coast National Park Authority issued draft site schedules, site proformas and accompanying information for consultation between 7<sup>th</sup> October and 28<sup>th</sup> October 2011. A Statement of Common Ground (SoCG) was subsequently prepared by the Council and, following consultation with the Study Group, was submitted to the Welsh Government on 11<sup>th</sup> November 2011.
- 1.7 It was necessary for an appointed Planning Inspector to resolve a number of disputed matters in relation to the land supply methodology and the categorisation of twelve sites.

- 1.8 The appointed Planning Inspector subsequently prepared a report for the Welsh Government (see Appendix 4), making recommendations on the points of dispute. The Planning Inspector's recommendations were considered by the Welsh Government and this information has been incorporated into this report. The Inspector recommended a land supply based on the residual methodology of 3.8 years.
- 1.9 Following a 'fact check' (by WG Planning Division) of the data within the SoCG, it has been determined that the large site completions figure should be amended to 6 units. The LPA have confirmed that the 7 unit completions noted in the SoCG was an error. In addition, the small site table within the SoCG (page 27) is incorrect and should be amended to reflect the small site completions documented in previous published studies. This results in an overall two unit reduction in the five year small sites completion table. It should be noted that these changes do not impact on the overall land supply.

## 2.0 HOUSING LAND SUPPLY

- 2.1 The five year land supply comprises sites with planning permission (outline or full) and sites allocated for housing in adopted development plans, categorised as prescribed in TAN 1.
- 2.2 The land supply has been calculated using the residual methodology. The Local Development Plan for Pembrokeshire Coast National Park was adopted in September 2010 and will form the basis for this and future studies.

**Table 1 – Identified Housing Land Supply**  
(A full list of sites can be found in Appendix 1)

<b>Housing Land Supply 01<sup>st</sup> April 2011 – 2016 (Large Sites)</b>								
	Proposed homes	5 Year Land Supply (TAN 1 categories)				Beyond 5 Years		Homes completed since last study
		Under construction	1	2	2*	3 (i)	3 (ii)	
<b>Total</b>	1067	46	7	330	0	684	0	6

- 2.2 Five year large site land supply break-down (i.e. Categories 1, 2, 2\*, and Under Construction):

Private	277
HA Private	106
HA Public	0
<b>Total</b>	<b>383</b>

### 2.3 Small Site Supply

Normally, small sites of less than 5 dwellings are based on the completions for the last five years. However, the Authority have accurate records of small site data and are able to determine the exact number of small sites not started and under construction (within the five year supply). Based on this the five year supply of **small sites is 129 units.**

**Table 2 – Small Site and Conversion Completions for previous 5 years**

Small Site Completions					
2006 – 2007	2007 - 2008	2008 - 2009	2009 – 2010	2010 - 2011	Total
29	38	30	19	20	<b>136</b>

The small sites 5 year annual average is (136/ 5 = 27)

2.4 Overall total 5 year land supply (large + small sites) is **512** (383 + 129).

**Table 3: 5 Year Land Supply Calculation**

(Residual Method: Pembrokeshire Coast National Park Local Development Plan 2006- 2021)

LDP Provision 2006- 2021 (15 Years)	Completions 01/04/2007 31/03/2011	Remainder April 2011- 2021 (10 Years) $c=a-b$	5 Year Requirement $d=c/10*5$ $d=1349/10*5$	Total Annual Building Requirement $e=d/5$	Total Land Available (inc small sites)	Total Land Supply $g=f/e$
a	b	c	d	e	f	g
1600	251	1349	675	135	512	3.8 years

### 3.0 COMMENTARY

3.1 The Council has recognised that under the residual method the land supply is below five years. In such instances, paragraph 5.1 of TAN 1 states that the LPA “must include a statement in the JHLA study outlining the measures it is taking to address the shortfall in housing land supply.”

### **Local Authority Statement**

- 3.2 The housing market in Pembrokeshire is characterised like most of West Wales by a higher proportion of construction on small sites by local builders. The slower rate of sales makes the market more readily suited to small / medium sized builders with a local labour force.
- 3.3 A significant downturn in economic conditions took place in 2008, with continuing impact on the housing market. Housing completions in 2009/10 and 2010 /11 are significantly lower than the longer term average completions in previous years (around 80 per year). PCNPA considers that the continuing depressed housing market has had a significant impact on housing development in Pembrokeshire. Many developers are choosing not to develop sites for this reason, rather than because of site specific deliverability issues. Developers also report difficulty in securing bank loans as a result of the economic situation and banking crisis, limiting their ability to bring sites forward.
- 3.4 The strategy of the Local Development Plan is to allocate land for residential development only to facilitate the delivery of affordable housing. Population estimates and projections for the Pembrokeshire Coast National Park suggest that the population is in decline and there is no requirement for a general increase in housing. However, the housing waiting list and surveys by the rural housing enabler suggest a significant need for affordable housing.
- 3.5 In line with para 4.1 of TAN 1 where the JHLA, and subsequently the AMR, identifies a shortfall in the housing land requirement, the Authority will need to consider in consultation with the Welsh Government whether it would be appropriate or necessary to review the LDP in whole or in part. The next AMR that needs to be submitted to the WG in respect of the Pembrokeshire Coast National Park LDP will be for the period 1<sup>st</sup> April 2011 to 31<sup>st</sup> March 2012 and this will be submitted in October 2012.

### **Past Build Rates Comparison**

- 3.6 TAN 1 states that to meet the requirement for a 5-year land supply the quantity of land agreed to be genuinely available may be compared with the remaining housing provision in the adopted development plan - the residual method. In some circumstances that calculation has indicated land shortages or surpluses which do not exist in practice. In such cases a comparison of available land with past building rates can provide a measure of the adequacy of land supply that is more relevant to the achievement of the general objectives of the development plan.
- 3.7 Whilst the Council acknowledge that the residual method should remain the method of calculating the land supply in accordance with TAN 1, it is considered that the past building rates figure should also be included within the study as has been the case in previous Pembrokeshire Joint JHLA studies.



**Table 5 - Sites subject to flood risk constraints (Large Sites)**

<b>Total Number and Percentage of Homes by Category and Land Type</b>												
Year	5 Year Supply				3i and 3 ii Categories				Completions 2010-11			
	C1		C2		C1		C2		C1		C2	
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
2011	0	0	0	0	0	0	8	1	0	0	0	0
2012												
2013												
2014												
2015												
2016												

**Table 6 - Completions by House Type – 1 April 2010 to 31 March 2011  
(Large Sites)**

6 (100%) houses completed



**Appendix 1 – Site Schedule (See Separate Document)**

## Appendix 2 – Past Completion Data

Year	Number of Homes Completed On		
	Large Sites	Small Sites	Total Completions
2007	27	29	56
2008	67	38	105
2009	53	30	83
2010	18	19	37
2011	6	20	26

## Appendix 3 – Previous Land Supply Data

Year	5 year supply - Number of Homes			Number of years supply	3i	3ii
	1	2	2*			
2007	134	71	0	*6.1	187	0
2008	60	118	0	*5.4	186	0
2009	15	148	0	*5.7	203	0
2010	9	111	0	*4.5	242	0
2011	53	330	0	3.8	684	0

\*Note that from 2007-2010 PCNP data was incorporated within a Joint JHLA study with Pembrokeshire County Council. There was no separate land supply table within these studies.

**Appendix 4 – Planning Inspector’s Recommendation (See Separate Document)**