

Priority E: Affordable Housing and Housing

E. Affordable Housing and Housing Provision

- 4.187 Policy 20 on the scale and location of growth seeks to provide for development which aims to meet the needs of the local population with priority being given to the delivery of affordable housing needs that is compatible with the National Park designation.
- 4.188 The strategy here is to provide for land for development predominantly for affordable housing, allowing a sufficient percentage of market housing to subsidise that affordable housing. There has also been the need to constrain development to take account of the need to protect the National Park.
- 4.189 How this strategy has been arrived at is explained in detail below taking account of issues emerging from various population projection work that has been undertaken; the difficulties in accurately identifying affordable housing need and finally the particular sensitivities that must be taken into account when needing to protect the special qualities of a National Park.
- 4.190 **Population projections:** The overall household growth for the Park as derived on a pro-rata basis from the overall Welsh Assembly Government population projection figures for Pembrokeshire shows a potential to increase the number of dwellings from 9,862 to 12,114, an increase of 2,252. Taking away the 496 completions that have taken place in the Park between 2001 and 2007 this leaves a figure of 1,756 or 125 per annum as a guide to housing provision. Breaking this down into sub areas of the Park this would mean:

Table 4 Household Projection Figures

Households	2001	2006	2011	2016	2021	Completions 01 to 07	07 to 21 Requirement	Annual Requirement
Tenby	2300	2513	2618	2726	2821	100	421	30
Newport	554	605	631	657	680	20	106	8
Saundersfoot	1238	1353	1409	1467	1519	40	241	17
St Davids	809	884	921	959	992	38	145	10
Rural Centres & Countryside	4961	5,436	5,663	5,895	6,102	298	843	60
Total	9862	10,791	11,242	11,704	12,114	496	1756	125

- 4.191 The Welsh Assembly Government has more recently published population forecasts for local authority areas (2008) which show a growth in population (if considered on a pro rata basis for the National Park) from 2003 to 2023 from 23,027 to 24,334 (an increase of 1,307). Household forecasts are awaited. At the 2001 Census average household size was 2.26 persons. Using this figure, the population increase would roughly suggest an increase in households of 578 over the period.
- 4.192 However, a simple population based apportionment of growth from projections at a local authority or regional level is unlikely to result in a useful population forecast. The nature of the starting population and migrant population are different in the area in and outside the National Park. In short both groups tend to be older in the National Park than the rest of Pembrokeshire. A population forecast prepared for the National Park area by Pembrokeshire County Council indicates the total number of National Park residents remaining more or less as it was at the 2001 Census.

- 4.193 The 2001 based projection, produced by Pembrokeshire County Council, includes a projection for the National Park, based on the Park's age and gender distribution in 2001 and migration between 2001 and 2005. This is a genuine cohort component projection for the National Park, rather than an apportion-based estimate of a cohort component projection for a wider area. As such the 2001 based projection produced by Pembrokeshire County Council is the most credible of the projections available and suggests that the population of the National Park will decline slightly between 2001 and 2021. This projection is so far supported by population estimates for 2001 to 2005 produced by the Office for National Statistics, which show a comparable reduction in population. Household projections produced by Pembrokeshire County Council as part of the same projections paper¹³⁶ show household size decreasing and this will offset the decline in population such that the number of households stays the same.
- 4.194 Therefore the most credible population projection for the National Park suggests there is no justification for housing development in the National Park to house an increasing population.
- 4.195 **Affordable Housing Need:** The Local Housing Market Assessment suggests there is a significant need for affordable housing in the National Park. However, there are significant concerns about the validity of the method used for the Local Housing Market Assessment and a belief that the figures arrived at represent a significant over estimate. This is considered to be primarily due to pro-rata apportionment of population projections to the National Park which is not considered appropriate in principal (see above) and also because adding the households applying to the Housing Authority to the number of households projected to form is likely to lead to double counting.¹³⁷
- 4.196 The Housing Register for Pembrokeshire in July 2008 suggests that there is a need for around 460 affordable houses in the National Park.¹³⁸ This figure represents the backlog of need for affordable housing in the National Park. The Authority is relying on the Housing Register as the primary source of evidence of need.
- 4.197 Migration figures used in the Pembrokeshire County Council population projections separate migration to and from the National Park into that with the rest of Pembrokeshire and that with places further afield. The different age patterns of this migration suggest that at least some of the migration out of the National Park into Pembrokeshire may be households unable to access suitable housing that they can afford in the National Park, that is, households who might otherwise choose to remain in the National Park.
- 4.198 Therefore, even though it is believed that the figures in the Local Housing Market Assessment are an over estimate, evidence from the Housing Register, and the age patterns of migration with the rest of Pembrokeshire suggest there is a substantial need for affordable housing within the National Park.
- 4.199 **Special Qualities:** If we wish to maintain the special qualities of the National Park, the amount of housing that can be built is limited by the capacity of the landscape to absorb it without significant impact. Even so, it has still been possible to identify sites to develop 1,349¹³⁹ residential units within the National Park – see table below. This figure does not include likely contributions from windfall¹⁴⁰ opportunities. Therefore, despite the restrictions necessary to conserve the National Park, sites can be allocated for the development of housing in the National Park.

¹³⁶ Pembrokeshire County Council (2008) Population, Household and Labour Force Projections
http://www.pembrokeshire.gov.uk/objview.asp?Language=&object_id=4136

¹³⁷ See Housing Background Paper, pages 16 to 18, which details these concerns.

¹³⁸ See Housing Background Paper for full details.

¹³⁹ See Housing Background Paper and Site Criteria Background Paper for full details.

¹⁴⁰ See Glossary of Terms.

Table 5 Housing Land Supply

Location	Supply March 2007 ¹⁴¹	Potential Sites Survey - Housing All Sites	Housing Allocations (5 or more dwellings)	Potential Sites Survey - Mixed Uses (All Allocated)	Housing Provision Figure	Annual Average Completion Rate (97-07)	Annual Provision Figure
Tier 2 Centre							
Tenby	86	345	345	83	514	14.1	34
Tier 3 Centres							
Newport	15	27	20	6	48	2.2	3
Saundersfoot	78	0	0	37	115	10.8	8
St Davids	16	113	113	5	134	4.8	9
Crymych	0	15	15	0	15	0.4	1
Rural Centres & Countryside	192	241	215	90	523	55	35
Totals	387	741	708	221	1349	87.3	90

- 4.200 A minimum density of 30 dwellings per hectare is proposed in the Local Development Plan's identified 'Centres' to make best use of the land made available. A further small contribution from windfall¹⁴² sites (an estimated 250 residential units) is likely through opportunities provided in countryside locations and through unforeseen opportunities in the Centres.
- 4.201 **Conclusion:** Though there is no reason to allocate housing land in order to house an increasing population, there is in order to build more affordable houses so that the proportion of affordable to market housing better reflects the housing needed in the National Park.
- 4.202 The amount of affordable housing needed in the National Park (whether identified through the Local Housing Market Assessment or the Housing Register) is greater than can be provided by public subsidy through Social Housing Grant – unless the money available for such subsidy is increased to an enormous degree.
- 4.203 Development feasibility studies on the allocation¹⁴³ sites in the Local Development Plan strongly indicate that, even without Social Housing Grant, most of the sites could be developed with 50 to 70% of the housing being affordable and subsidised by the profit from the market dwellings on the development.
- 4.204 Therefore the profits from market houses on mixed tenure developments can subsidise the provision of more affordable housing than could be delivered through public subsidy. Sufficient housing to meet at least some of the need identified in the Local Housing Market Assessment (should this be correct) and all of the current need indicated by the Housing Register.
- 4.205 The table below shows the anticipated affordable housing provision over the Plan period. It does not include possible contributions from windfalls and exceptions sites in the Plan period. The provision is to address the backlog of affordable housing need as identified on the Housing Register plus any newly arising need. Financial viability issues have been tested when deriving these assessments in accordance with national planning policy.¹⁴⁴ Where it can be proven that a proposal is unable to deliver (i.e. the proposal would not be financially viable) in terms of the policy requirements of the Plan for affordable housing provision, sustainable design standards

¹⁴¹ Land with planning permission

¹⁴² Unforeseen contributions to the housing land supply through for example, demolition or reuse of buildings.

¹⁴³ See Glossary of Terms

¹⁴⁴ See Background Paper on Housing.

expected and community infrastructure provision priority will be given to the delivery of affordable housing in any further negotiations.

Table 6 Affordable Housing Provision

Location	From land with Permission March 07	Housing Allocations	Mixed Use Sites	Total
Tenby	4	207	49	260
Crymych	0	8	0	8
Saundersfoot	0	0	7	7
St Davids	0	50	0	50
Newport	13	14	0	27
Rural Centres & Countryside	5	119	41	165
	22	398	97	517

- 4.206 Generally affordable housing will have been secured through negotiations on sites of 2 or more units at 50% provision of affordable housing.¹⁴⁵ In areas of acute affordable housing need and limited housing land supply this figure will be higher (please see policy below).¹⁴⁶ To help boost provision priority will be given to meeting affordable housing need in countryside locations in conversions and infill opportunities etc. Some affordable provision will have also been secured where existing community facilities were no longer required or considered commercially viable and through the release of land that would not normally be released. In addition, some employment sites have been reused for affordable housing provision.
- 4.207 Exceptions sites for affordable housing will also be considered. The Rural Housing Enabler¹⁴⁷ for Pembrokeshire has carried out a series of surveys in the National Park and work is ongoing to explore opportunities to release land.

Policy 44 HOUSING (Strategy Policy)¹⁴⁸

During the Local Development Plan period – end date 2021, land will be released for the provision of approximately 962 dwellings. Allocations for housing are listed in Table 7 and are shown on the Proposals Map. This is in addition to land already with planning permission - 387.

These dwellings will be distributed as follows:

- a) Tenby Local Service and Tourism Centre – approximately 428 dwellings (land already with planning permission 86 dwellings)**
- b) Newport, St Davids, Saundersfoot and Crymych Local Centres – approximately 203 dwellings (land already with planning permission - 109 dwellings)**
- c) Rural Centres¹⁴⁹ and Countryside – approximately 331 dwellings (land**

¹⁴⁵ Please note that the threshold for negotiating affordable housing provision is 2 or more residential units. Where a planning application is received for a site below the affordable housing threshold but which is part of a larger site which is above the threshold then the Authority will expect affordable housing to be provided. This is to ensure that sites are not broken up into smaller portions and phased which would avoid the requirement for affordable housing

¹⁴⁶ See Housing Background Paper for full details on how these percentages were calculated.

¹⁴⁷ See Glossary of Terms.

¹⁴⁸ These figures are taken from Table 5.

already with planning permission 192 dwellings)

A windfall contribution of 250 dwellings is also expected.

The Authority will require a minimum density of 30 dwellings per hectare on housing development in the Centres where this is compatible with the character of the Centres. Housing development in countryside locations as permitted under Policy 7 will need to be compatible with the existing character of the area.

Some sites will require phasing of development – see Table 8 below.

Policy 45 **AFFORDABLE HOUSING (Strategy Policy)**

To deliver affordable housing the National Park Authority will as part of the overall housing provision:

- a) Seek to negotiate 50% affordable housing to meet the identified need in developments of 2 or more units in housing developments in all Centres identified in the plan area with the following exceptions where a higher percentage will be negotiated: Tenby (60%), Newport (70%), Saundersfoot (60%), Dale (80%), Dinas Cross (100%) and New Hedges (60%).
- b) Allow the exceptional release of land within or adjoining Centres for affordable housing to meet an identified local need.¹⁵⁰
- c) Where an affordable housing need has been identified prioritise affordable housing provision in countryside locations through filling in gaps or rounding off or through conversion.¹⁵¹ 50% affordable housing to meet an identified need in developments of 2 or more residential units will be sought.
- d) Seek a commuted sum to help with the delivery of affordable housing on housing developments below the threshold of 2 units (i.e. on proposals for single residential units).^{152 153}

When considering a new use for a redundant community facility an employment use or affordable housing will be prioritised. When considering a new use for an employment use a community use such as affordable housing provision will be given priority. 50% affordable housing to meet an identified need in developments 2 or more residential units will be sought.

Where it can be proven that a proposal is unable to deliver (i.e. the proposal would not be financially viable) in terms of the policy requirements of the Plan (i.e. for affordable housing provision, sustainable design standards expected and community infrastructure provision) priority will be given to the delivery of affordable housing in any further negotiations, provided that it can be

¹⁴⁹ See Policy 6 for a list of Centres.

¹⁵⁰ Affordable housing on exceptions sites should meet the needs of local people (paragraph 9.2.23 of Planning Policy Wales, Edition 3, July 2010).

¹⁵¹ Affordable housing in conversions in the countryside can be for local need. (paragraph 7.6.9 of Planning Policy Wales, Edition 3, July 2010) See also paragraph 9.2.24 regarding constraints to consider for such developments.

¹⁵² Planning Policy Wales, Edition 3, July 2010, paragraph 9.2.16

¹⁵³ The National Park Authority will prepare supplementary planning guidance on the extent of contributions to affordable housing which will be required from single unit developments. The guidance will be completed within 12 months of the adoption of the Local Development Plan.

demonstrated that the proposal would not unduly overburden existing community infrastructure provision.

The affordable housing target for the Plan period is 530 residential units.

4.208 Planning guidance on affordable housing prepared jointly with Pembrokeshire County Council will require updating.

Table 7 Allocations of Housing Sites (see Proposals Map and Appendix 2)¹⁵⁴

Location	Proposals Map ID	Site Name	Area Hectare	Residential Units	% Affordable Units	Affordable Housing Provision expected
Tenby	HA377	Brynhir	6.35	168	60	101
Tenby	HA723	former cottage Hospital Site	0.17	10	60	6
Tenby	HA724	Rectory Car Park	0.94	50	60	30
Tenby	HA727	West of Narberth Road	1.14	25	60	15
Tenby	HA752	Butts Field Car park, Tenby	0.94	80	60	48
Tenby	HA760	Reservoir Site, Tenby	0.33	12	60	7
Crymych	HA750	Depot Site	0.37	15	50	8
Newport	HA825	North of Feidr Eglwys	1.50	20	70	14
St David's	HA385	North of Twr-y-Felin	0.92	13	(current permission for 0 affordable/ renewal 50%)	
St David's	HA737	St Davids West Glasfryn Road	3.80	90	50	45
St David's	HA789	Adj Ysgol Bro Dewi, Nun Street	0.56	10	50	5
Broad Haven	HA734	South of Driftwood Close	0.66	8	50	4
Dale	HA382	Castle Way	0.55	12	80	10
Dinas Cross	HA387	Opposite Bay View Terrace	0.25	12	100	12
Herbrandston	HA732	East of Herbrandston Hall	0.38	12	50	6
Jameston	HA436	North of Landway Farm	0.32	7	(current permission for 1 affordable/ renewal 50%)	
Jameston	HA730	Opposite Bush	1.69	35	50	18

¹⁵⁴ Please see Background Papers 'Site Criteria' and Housing Background Paper for more information. Only sites for 5 or more dwellings are allocated. Please also see Table 3 Mixed Sites for housing and affordable housing contributions.

Location	Proposals Map ID	Site Name	Area Hectare	Residential Units	% Affordable Units	Affordable Housing Provision expected
		Terrace				
Jameston	HA821	Green Grove	0.36	5	50	3
Lawrenny	HA559	Adjacent Home Farm	1.07	30	50	15
Manorbier Station	HA848	Field opp Manorbier VC School	0.64	19	50	10
New Hedges	HA813	Rear of Cross Park	1.42	30	60	18
Solva	HA384	Adjacent to Bro Dawel	1.65	18	50	9
Solva	HA792	Bank House, Whitchurch Lane	0.61	12	50	6
Trefin	HA738	North of Heol Crwys	0.61	15	50	8
Total			27.23	708		398

4.209 Phasing the development of some sites will be needed, for example, to take account of infrastructural requirements, potential impacts on the Welsh language, to allow satisfactory absorption of development into communities or to ensure some land is available throughout the Local Development Plan period. Appendix 2 explains the background to the phasing proposed. For more information on mixed use sites please see Table 3 of the Plan.

Table 8 Phasing of Housing & Mixed Use Sites

Location Proposals Map ID	Site Name and Location	Number of Units	Phase 1 (2007 - 2011)	Phase 2 (2012 -2017)	Phase 3 (2018 to 2021)
Broad Haven MA776	Land north east of Marine Road	35		35	
Broad Haven HA734	South of Driftwood Close	8		8	
Jameston HA730	Opposite Bush Terrace	35		20	15
Lawrenny HA559	Adj Home Farm	30	15	15	0
Manorbier Station HA848	Field opp Manorbier VC School	19		9	10
Manorbier Station MA895	Land part of Buttylands	15		8	7
New Hedges HA813	Rear of Cross Park	30		15	15
Solva HA384	Adj Bro Dawel	18		18	0
Solva HA792	Bank House, Whitchurch Lane	12		12	0
St Davids HA737	West of Glasfryn Rd	90		30	60
St Ishmaels MA733	Adj School	40		16	24
Tenby HA377	Brynhir	168	30	90	48
Trefin	North of Heol Crwys	15		10	5

Location Proposals Map ID	Site Name and Location	Number of Units	Phase 1 (2007 - 2011)	Phase 2 (2012 -2017)	Phase 3 (2018 to 2021)
HA738					
		515	45	286	184

4.210 The following policies and advice provide additional guidance on housing.

Gypsy Sites

Policy 46	<p>Gypsy Sites</p> <p>Proposals for Gypsy and Traveller sites will be permitted where:</p> <ul style="list-style-type: none"> a) evidence of need to locate or provide transitory arrangements in the area has been identified; and b) the site is well located to serve the needs of Gypsy and Travellers including the need to access local services; and c) the site has good access to a public road which is safe and direct; and d) the site is suitable for the development and on site services facilities can be adequately provided; and e) amenity issues for both residents on the site and neighbouring properties are adequately addressed; and f) the proposal does not cause significant visual intrusion, is sensitively sited in the landscape and satisfactory landscaping is provided.
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4.211 There are five Gypsy caravan sites in Pembrokeshire located in Kilgetty, Waterloo (Pembroke Dock), Monkton, Merlin's Bridge and Rudbaxton providing a total of 84 pitches.

4.212 Pembrokeshire County Council will monitor provision and if a need arises for additional sites, or extensions to existing ones, the Council and the National Park Authority will work with the relevant bodies and organisations to provide suitable additional land.

4.213 The potential for negative effects on Natura 2000 sites is unlikely but remains dependant on the scale and location of the site.

Policy 47	Low Impact Development Making a Positive Contribution Low impact development in the countryside that makes a positive contribution will be permitted where: a) the proposal will make a positive environmental, social and/or economic contribution with public benefit; and b) all activities and structures on site have low impact in terms of the environment and use of resources; and c) opportunities to reuse buildings which are available in the proposal's area of operation have been investigated and shown to be impracticable; and d) the development is well integrated into the landscape and does not have adverse visual effects; and e) the proposal requires a countryside location and is tied directly to the land on which it is located, and involves agriculture, forestry or horticulture; and f) the proposal will provide sufficient livelihood for and substantially meet the needs of residents on the site; and g) the number of adult residents should be directly related to the functional requirements of the enterprise; and h) in the event of the development involving members of more than one family, the proposal will be managed and controlled by a trust, co-operative or other similar mechanism in which the occupiers have an interest.
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4.214 Proof that there is a positive contribution from the development in terms of the environment, the use of resources, and a combination of social/economic benefits will be needed. Public benefits might include providing services to the community. Proof that the proposals will achieve a neutral or at least the lowest possible adverse impact for each part of the government's sustainability agenda must be submitted. A management plan for the proposal will be required to cover a range of issues including renewable energy generation (See Policy 33). Supplementary planning guidance drafted under the Joint Unitary Development Plan for Pembrokeshire will be taken forward under the Local Development Plan.

Key Actions outside the Local Development Plan

4.215 Continued commitment from local housing associations and the local housing authority, Pembrokeshire County Council to help in the delivery of affordable housing. The majority of allocations can proceed without the need for Social Housing Grant.¹⁵⁵

¹⁵⁵ See Housing Background Paper