
Pembrokeshire Coast National Park

Management Plan (2015-2019)

Local Development Plan 2 (2015-2031)

Background Paper: Housing

November -2018

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PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY

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Mobile Homes (Wales) Act 2013

1. The Mobile Homes (Wales) Act 2013 came into force on 1 October 2014. It is designed to help improve regulation of the industry, so that conditions on mobile home sites are improved and the rights of residents are better protected.
2. The main features of the law are:
 - site owners will be required to apply for a licence from their local authority to operate a site. The licence will last up to 5 years
 - site managers will need to pass a 'fit and proper person' test before being awarded a licence
 - site owners will no longer be able to block the sale of a mobile home. The mobile home owner will be free to sell their home to who they wish
 - local authorities will be able to inspect sites and issue a fixed penalty notice to site owners if conditions on the site are not kept properly
 - in more serious instances, local authorities will be able to issue the site owners with a compliance notice to make sure that site conditions are upheld
 - pitch fees can only be increased in line with the Consumer Prices Index
 - site owners and residents will be able to appeal to the Residential Property Tribunal in certain circumstances.

Housing (Wales) Act 2014

3. The key elements of the Act are:
 - introduction of a compulsory registration and licensing scheme for private rented sector landlords and letting and management agents, which will be delivered by Rent Smart Wales
 - reform of homelessness law, including placing a stronger duty on local authorities to prevent homelessness and allowing them to use suitable accommodation in the private sector
 - placing a duty on local authorities to provide sites for Gypsies and Travellers where a need has been identified
 - introduction of standards for local authorities on rents, service charges and quality of accommodation
 - reform of the Housing Revenue Account Subsidy system
 - giving local authorities the power to charge more than the standard rate of council tax on long-term empty properties and certain types of second homes
 - assisting the provision of housing by Co-operative Housing Associations, and
 - amendment of the Leasehold Reform, Housing and Urban Development Act 1993. (Wales) Act 2014

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4. New housing should have a mix of affordable and market housing (paragraph 9.1.1)
5. Local planning authorities should promote: mixed tenure communities; mixed use development; safe, attractive, usable areas around dwellings; greater emphasis on quality, good design; the most efficient use of land; construction of housing with low environmental impact and 'barrier free' housing developments, for example built to Lifetime Homes standards. (paragraph 9.1.2)
6. Local authorities' planning and housing functions must combine in partnership with local stakeholders, including private house builders, to produce Local Housing Market Assessments (LHMAs). (paragraph 9.1.4)
7. In planning the provision for new housing, local planning authorities must work in collaboration with housing authorities, registered social landlords, house builders, developers, land owners and the community. A range of matters must be taken account of:
 - People , Places, Futures – The Wales Spatial Plan (see later in this Background Paper and the Background Paper Scale and Location of Growth);
 - the Welsh Government's latest household projections (see Scale and Location of Growth Background Paper)
 - local housing strategies (see later in this Background Paper);
 - community strategies (now the Single Integrated Plan – see later in this Background Paper);
 - local housing requirements (needs and demands)(see Scale and Location of Growth Background Paper and the Pembrokeshire Local Housing Market Assessment and later in this Background Paper);
 - the needs of the local and national economy (See Economy Background Paper);
 - social considerations (including unmet need) see Pembrokeshire Local Housing Market Assessment and later in this Background Paper);
 - the capacity of an area in terms of social, environmental and cultural factors (including consideration of the Welsh language) to accommodate more housing (see Site Criteria Background Paper, Sustainability Appraisal, Welsh Language Background Paper)
 - the environmental implications, energy consumption, greenhouse gas emissions and flood risk (see Site Criteria Background Paper, and Climate Change Background Paper);
 - the capacity of the existing or planned infrastructure (see Site Criteria Background Paper & Scale and Location of Growth Background Paper); and

- the need to tackle the causes and consequences of climate change (see Site Criteria Paper, Scale and Location of Growth Background Paper and Climate Change Background Paper). See paragraph 9.2.1.
8. The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment, will form part of the plan's evidence base together with other key issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations, the provisions of corporate strategies and the deliverability of the Plan need to be considered. Local planning authorities will need to assess whether the various elements of the projections are appropriate for their area, and if not, undertake modelling, based on robust evidence, which can be clearly articulated and evidenced, to identify alternative options. Implications for neighbouring authorities need to be considered. (paragraph 9.2.2). (See Scale and Location of Growth Background Paper and later in this Background Paper.)
 9. Local planning authorities must ensure that sufficient land is genuinely available or will become available to provide a 5-year supply of land for housing judged against the general objectives and the scale and location of development provided for in the development plan. (see later in this Background Paper) (paragraph 9.2.3)
 10. If 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), local planning authorities will need carefully to justify the variation with robust evidence. (see later in this Background Paper) (paragraph 9.2.4)
 11. Provide a spatial pattern of housing development that balances social, economic and environmental needs. Work together with housebuilders to identify appropriate sites. (paragraph 9.2.5)
 12. Maximising the use of suitable previously developed land for housing can assist regeneration and relieve pressure for development on greenfield sites. (paragraph 9.2.6) Use a search sequence for allocating sites starting from within settlements and working outwards. (paragraph 9.2.8)
 13. Criteria in deciding which sites to allocate are listed. (paragraph 9.2.9)

Local planning authorities should consider the following criteria in deciding which sites to allocate for housing in their development plans:

- the availability of previously developed sites and empty or underused buildings and their suitability for housing use;
- the location of potential development sites and their accessibility to jobs, shops and services by modes other than the car, and the potential for improving such accessibility;
- the capacity of existing and potential infrastructure, including public transport, water and sewerage, other utilities and social infrastructure (such as schools and hospitals), to absorb further development, and the cost of adding further infrastructure;

- the scope to build sustainable communities to support new physical and social infrastructure, including consideration of the effect on the Welsh language (see 4.13), and to provide sufficient demand to sustain appropriate local services and facilities;
 - the physical and environmental constraints on development of land, including, for example, the level of contamination, stability and flood risk, taking into account the possible increase of such risk as a result of climate change (and see Chapter 13), and the location of fragile habitats and species, archaeological and historic sites and landscapes (Chapters 5 and 6);
 - the compatibility of housing with neighbouring established land uses which might be adversely affected by encroaching residential development; and
 - the potential to reduce carbon emissions through co-location with other uses.
14. Higher densities should be encouraged on easily accessible sites, where appropriate, but these will need to be carefully designed to ensure a high quality environment. (paragraph 9.2.12)
15. ‘Tandem’ development, consisting of one house immediately behind another and sharing the same access, may cause difficulties of access to the house at the back and disturbance and lack of privacy to the house in front and should be avoided. (paragraph 9.2.13)
16. A community’s need for affordable housing is a material planning consideration which must be taken into account in formulating development plan policies. (paragraph 9.2.14)
17. Plans should include an authority wide target for affordable housing, (LHMA based) site thresholds or a combination of thresholds and site-specific targets for the delivery of affordable housing, commuted sums and exceptions sites. All new market housing can make a contribution. (paragraphs 9.2.16 and 9.2.17)
18. 100% affordable housing allocations are allowed based on criteria reflecting local circumstances which are set out in the development plan and relate to the creation of sustainable communities. Such sites are likely to be small in number, in relation to the total number of sites available in a local planning authority area, and in scale. (paragraph 9.2.18)
19. Policies must indicate that an authority will seek to negotiate with developers where it is intended to include an element of affordable housing in proposed developments. Policies should also state what the authority would regard as affordable housing and what arrangements it would expect to ensure that such housing remains reserved for those who need it. (Paragraph 9.2.19)
20. Take account of the accommodation needs of Gypsy families (Paragraph 9.2.21)
21. Housing in rural areas should embody sustainability principles. Housing in the countryside away from identified settlements must be strictly controlled. Infilling and rounding off maybe acceptable, particularly where it is to meet local need for

affordable housing. Much depends on the character of the area, pattern of development and accessibility to the main towns. (9.2.22 and 9.3.2)

22. There is special provision for rural exceptions sites for affordable housing. (Paragraph 9.2.23) The special provision of affordable housing exception sites must be considered to help ensure the viability of the local community.
23. Applications for rural enterprise dwellings need to fulfil the requirements set out in Technical Advice Note 6. This includes ensuring they are classified as and remain available for affordable housing (Paragraph 9.3.6 to 9.3.10)
24. One Planet Developments proposals can be developed. (Paragraphs 9.3.11 and 9.3.12)

Technical Advice Note 6 - Planning for Sustainable Rural Communities (2010)¹

25. This Note provides guidance on:

- the need for Development Plans to define 'local need' taking into account the social, economic and environmental characteristics of the area.² Where possible existing definitions of local need, for example affordable housing to meet local need, should be adopted, or if necessary modified to include other land uses. (Paragraph 2.2.2) Where proposals are intended to meet local needs, planning authorities should recognise that a site may be acceptable even though it may not be accessible other than by private car. (Paragraph 2.2.3)
- Development plans should include sufficient land to meet market and affordable housing needs across the planning authority's area. In rural areas, especially where there are environmental constraints or social or cultural considerations, planning authorities may wish to give priority to affordable housing to meet local needs. (Paragraph 4.12)
- Planning authorities should employ all available policy approaches, in an innovative way, to maximise the supply of affordable housing as defined in TAN 2. In market towns and larger villages, where housing sites are identified, development plans should set indicative targets and thresholds for the provision of affordable housing. (Paragraph 4.2.2)
- Rural Enterprise Dwellings (paragraph 4.3 to 4.14)
- One Planet Developments (paragraph 4.15 and 4.16)

¹ Technical Advice Note 6 published July 2010.

² The Note refers to Planning Policy Wales Edition 4 paragraph 9.2.4 which describes diverging from national policies in order to meet local housing need.

~~National Parks Statement Final (March 2007)~~

26. ~~The Authority is not a housing authority but it should work closely with the housing authority when the local housing market assessment and housing strategy is being prepared. In terms securing the social and economic wellbeing of local Park communities, appropriate and affordable housing provision are clearly vital ingredients. Collaborative working is important for the effective delivery of affordable housing (page 11 first paragraph).~~

Technical Advice Note 1: Joint Housing Land Availability Studies (2015)

27. Local planning authorities should integrate the LDP and JHLAS processes. JHLAS provide an important part of the evidence base for LDP preparation. They provide information on the current supply and distribution of housing land and the anticipated delivery rates of development plan allocations and housing commitments. The studies also provide information on actual completion rates and the level of small site provision. (paragraph 3.1)
28. Housing land availability, and the need to demonstrate a five-year housing land supply, is a key part of the LDP examination process. Local planning authorities are required to demonstrate that there is a five-year housing land supply at the time the plan is adopted and the latest approved JHLAS can be used as an important piece of evidence. (paragraph 3.2)
29. Local planning authorities without an up-to-date JHLAS, should nevertheless carry out an objective assessment of their housing land supply on an annual basis in preparation for their LDP. This assessment will not be subject to the formal JHLAS process or carry the same weight for planning purposes as a formal study. (paragraph 3.3)

Technical Advice Note 2: Planning and Affordable Housing June 2006

30. Provides practical guidance in securing affordable housing.

Technical Advice Note 18: Transport March 2007

31. Include policies and standards on density to achieve higher residential densities in places with good public transport accessibility and capacity.

National Housing Strategy - 'Improving Lives and Communities - Homes in Wales' April 2010

Refers to the need for close working between planning and housing in local authorities. Ensure that Local Development Plans and planning policy at a local level can address the shortfall in houses that people can afford (paragraph 3.9).

Technical Advice Note 20 - Planning and the Welsh Language (2017)

32. Issues in relation to Technical Advice Note 20 are addressed in the Welsh Language Background Paper.

Taking Wales Forward 2016-2021 - Programme for Government

33. Housing action points relevant to this Authority are highlighted under Chapter 6: Welsh Homes :

- Prosperity brings security to individuals, families and communities. Our aim is better jobs, closer to home. We want work and secure housing for all, supported by sustainable growth in our businesses. (page 4)
- Work in partnership to deliver an extra 20,000 affordable homes in the next term, including supporting construction of more than 6,000 homes through the Help to Buy scheme.
- Introduce a new 'Rent to Own' housing model.
- Explore options to end land banking.
- Continue long term collaboration with house builders to deliver accelerated rates of house building.
- Safeguard social housing in rural communities by ending Right to Buy and continuing to support the work of Rural Housing Enablers.

Securing Mortgage Access for Affordable Housing: A good practice note for planning and housing practitioners (2013)

34. The document provides examples of good practice in drafting S106 agreements.

35. The current supplementary planning guidance on affordable housing (November 2014) takes account of the advice provided in this good practice note. A further review of the guidance will be necessary to address the difficulties that remain regarding providing mortgages for Low Cost Home Ownership despite reflecting the good practice note approach. Pembrokeshire County Council's recently revised supplementary guidance seeks to address this issue and its success is being monitored. In the interim issues with mortgage lending are being addressed on a case by case basis. No change to the Local Development Plan is required. A review of the current supplementary planning guidance in due course to address mortgage lending issues is likely to be needed.

Wales Spatial Plan

36. See Scale & Location of Growth Background Paper

Statutory Code of Practice on Racial Equality in Housing (Wales) (2006)

37. Under the duty to promote race equality, public authorities must assess the way policies they are proposing, including strategies and plans, are likely to affect different racial groups, including groups that have been overlooked, such as

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Gypsies and Travellers. Public authorities must also consult people who are likely to be affected by their policies, and take account of any particular needs.

38. The Equality and Human Rights Commission has published online guidance on equality impact assessment for public authorities. An Equalities Impact Assessment has been prepared for Local Development Plan 2.

Regional

Spatial Plan Key Settlement Framework (agreed Ministerial Meeting 23rd November 2006)

39. The key issue identified for housing is affordable housing provision. High house prices and low incomes result in problems of affordability and that need to be addressed. The pool of accommodation to meet the needs of the homeless needs to be expanded.

40. This is to be addressed by the following objective:

'H4) Affordable Housing – There is a need for a programme to be established and continually updated to assess the scale of needs, including the role of the Rural Housing Enabler and new build low cost home ownership schemes. When the scale has been established a series of delivery mechanisms including social housing grants, low cost home ownership schemes, developer contributions/planning obligations, etc. are to be implemented as a means of addressing the issues.'

41. It is particularly difficult to achieve the development of affordable housing in the National Park where environmental capacity constraints restrict the opportunities to provide for building additional homes.

Wales Spatial Plan People, Places, Futures 2008

42. This document provides an update to the Wales Spatial Plan.

43. This document is based on the Wales Spatial Plan Key Settlement Framework.

44. Nationally, a lack of good quality housing affects people's health and wellbeing and influences their long-term life chances. The scale of population growth that needs to be accommodated is challenging, with a projected growth of 330,000 persons across Wales between 2006 and 2031. Equally important is the need to maintain a mix of tenure and size of housing to ensure balanced communities. To address this the Welsh Assembly Government is committed to delivering 6,500 new affordable homes by 2011. (page 22)

45. The general principles for new housing growth are: it should be linked to public transport nodes, including walking and cycling networks; it should take account of environmental constraints, including flood risk; and it should meet high standards of energy efficiency. Housing developed near public transport nodes should be at

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higher than current densities to promote use of public transport and to increase opportunities for combined heat and power systems. Accommodating appropriate development in smaller settlements and rural areas is vital for supporting the development of more rural communities. (page 23)

46. One of the key priorities for the Pembrokeshire Haven area is: sustaining and strengthening communities by taking focused action to address both rural and urban deprivation and economic inactivity and to ensure housing provision appropriate to all. (page 83)
47. New provision of housing is likely to reflect the historical pattern of development in the area commensurate with the settlement approach identified in the Framework with a continued emphasis on settlements within the strategic hubs along the urban corridor linking the M4 to the Area's ports. Notwithstanding the emphasis on key settlements, it is important that housing growth also seeks to revitalise and sustain smaller centres and communities. Housing provision in the National Park should be at a scale which aims to meet the needs of the local population in line with the Park's statutory purposes and duty. (page 88)
48. Housing projections are being worked on under the auspices of the South West Wales Regional Planning Group. Further work by the local authorities and the National Park Authority linked to on-going assessments of local housing needs will be undertaken as a priority to ensure the future supply of affordable housing to support a local workforce and to achieve a socially inclusive and balanced population. (page 88)

Local

Single Integrated Plan 2013 - 2018

49. The Single Integrated Plan has replaced the following existing plans and strategies:

- The Community Strategy
- The Children and Young People's Plan
- The Health, Social Care and Well-being Strategy
- The Community Safety Strategy

50. A search on housing in the Plan identifies the following references:

- Provide housing opportunities to meet the needs of young people (headline action)
- Provide affordable and appropriate housing (headline action)

Well-being Plan for Pembrokeshire

51. Pembrokeshire's Wellbeing Assessment was approved by the Pembrokeshire Public Services Board in April 2017 with the Well-being Plan itself anticipated for publication by May 2018. The Plan will replace the Single Integrated Plan. Account has been taken of the national wellbeing objectives through the Sustainability Appraisal and Equalities Impact Assessment of the Local Development Plan Preferred Strategy. A consultation draft Well-being Plan for Pembrokeshire was published in September 2017, setting out how the Pembrokeshire Public Services Board can add value to existing programmes and partnerships. The draft Well-being Plan identifies two well-being objectives and four workstreams. Emerging Local Development Plan policies will contribute to these, in particular to the workstreams concerned with housing and transport.

Ageing Well in Pembrokeshire January 2016

52. Older people are asking for:

- More social housing and for a variety of options for older people throughout the county, but for consideration to be taken on where bus routes are located.
- They wish to see more Lifetime homes built and for private builders to also consider the needs of older people.
- Older people would like to see an extra care facility built in the south of the county and in an accessible location.
- Many older people living in supported accommodation were complimentary of the support available to them to help live independently, but an increase in this type of accommodation would be welcomed.
-

53. Priorities to be delivered 2015 – 2018:

- Shelter Cymru is launching a supportive project for people over 50 in Pembrokeshire with housing support needs.
- Ensure information is provided to residents in supported accommodation.
- Work with the Housing Department to ensure views and needs of older people are considered.

Building Regulations for new dwellings

54. New dwellings must comply with the requirements of Part M – Access to and use of buildings.

55. This considers accessibility for visitable dwellings, accessible and adaptable dwellings (potentially suitable for a wide range of users including older persons) and for wheelchair user dwellings. The accessible and adaptable dwelling requirement is not mandatory.

56. Approved Document M details methods of achieving compliance and can be found here:

[Housing Background Paper November 2018TypoEdit.docxHousing Background Paper November 2018](#)

57. <http://www.planningportal.gov.uk/buildingregulations/approveddocuments/partm/adm/admvol1>

Joint Housing Land Availability Studies

58. The Authority is required to demonstrate a five year effectively available housing land supply.
59. The 2017 Study shows a 1.2 year land supply. The Plan will end part-way through the Joint Housing Land Availability Study period (2021 Plan end date) and so the method of calculation takes this into account (as set out in Table 4 of Technical Advice Note 1).
60. There are a number of allocated sites which are the subject of well-advanced pre-application discussion, but re-allocation and deliverability of sites for housing development is matter being fully considered through the current Local Development Plan revision process (see also Appendix 2).
61. For Local Development Plan revision this will mean revisiting the overall housing land requirements and consequently the Plan's housing provision and acknowledging uncertainties in the housing market in setting annual targets. The low land supply is caused by a variety of factors, the most common being a lack of interest by landowners in wishing to develop their land in the short and medium term. Interest in developing sites allocated in the Local Development Plan has shown a marked increase in recent years with a number of pre-application enquiries and planning applications made to the Authority. This has not been sufficient, however, to meet the cumulative shortfall of sites coming forward in the first few years of the Plan adoption and is now a matter for the Local Development Plan revision.
62. Below is a table showing the average time taken for housing proposals of varying sizes to come to fruition (completion) from inception (from permission granted) from 2007 to 2015. This only includes permissions where the development has been completed.

Table 1 Housing Proposals that were completed – Average number of years to complete from permission

Numbers of units	Years										
	2007-08	2008-09	2009-10	2010-11	2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	Overall
Single Plots	2.57	2.83	3.75	3.06	3.69	3.92	2.5	2.61	2.4	3.2	3.05
2 - 5 units	1.56	2.15	1.75	4.5	4.43		6.2	2	1.5	1	2.79
6 - 10 units	7.5	1.5	1	0	4	0	2	5.33	3.67	3.67	3.58
11 - 20 units	6.5	3.2	6	7.33	6.5	10	10	6.5	4	3.5	3.14
More than 20 units	0	7	0	0	10	0	0	3	0	8	7

63. The table below lists sites which have been allocated for residential development in:

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- The Local Plan (adopted April 1999)
- The Joint Unitary Development Plan for Pembrokeshire (Adopted June/July 2006)
- The Local Development Plan (Adopted September 2010)

64. The table shows (included in the November 2016 Housing Background Paper) how many of the sites have been brought forward for development, indicating the date that planning permission was first granted on each site; whether development has commenced; and if the site has been completed.

65. The colour-coding helps to show the stage that has been reached for each site:

- No action (also includes sites which are no longer allocated)
- This stage should be reached in due course
- This stage has been completed.

The reasons for sites not coming forward vary. Reasons where known are indicated by the symbols in the last column of the table:

- ⌚ Landowner is in discussion with the Authority about developing the site but needs more time;
- ⬆ Landowner does not wish to develop the site;
- ? Landowner is unknown;
- 1 Site is now used for other purposes;

Table 2 Housing Allocations - Progress

Allocations for housing	Number of units ³	First Allocated (years to permission ⁴)	Date planning permission first granted	Number of units	Development commenced (years from permission where not completed) ⁵	Development Completed (years to completion from commencement) ⁶
Land at Castle Way, Dale	12	1999				†
Tabor, Dinas Cross	4	1999 (6)	March 2003	4		March 2008 (5)
Opposite Bay View Terrace, Dinas Cross	12	1999				†
West of Trewent Road, Freshwater	Not specified	1999				1

³ Some sites have been allocated several times. The figure in this column reflects the highest number of units allocated on the site.

⁴ Average 4.25 years from allocation to permission granted.

⁵ Average nearly 3 years from permission to commencement for those sites not completed.

⁶ Nearly 4 years from permission to completion (sites completed in the table were less than 5 units)

	Allocations for housing	Number of units ³	First Allocated (years to permission ⁴)	Date planning permission first granted	Number of units	Development commenced (years from permission where not completed) ⁵	Development Completed(years to completion from commencement) ⁶
	East						
	Sir Benfro Hotel, Herbrandston	10	1999(9)	May 2008	28	March 2012 (4)	
	Boat Yard, Little Haven	3	1999(3)	March 2002	2		July 2003(4)
	Centre of Llanychaer	2	1999				1
	Between Hounsel and Gray Avenue, Skrinkle	4	1999(7)	January 2006	3		March 2008(1)
	East of Windy Ridge, Skrinkle	3	1999	November 1996	1		August 1997(1)
	Adj to the School, Mynachlogddu	3	1999	November 1998	3		January 2005(7)
	Near Belle Vue, Rosebush	2	1999(11)	March 2010	5		
	Adj to Bro Dawel, Solva	24	1999(1)	February 2000 (part of site)	6	June 2001(2)	
	Grove Field, St Davids	Not specified	1999				1
	Concrete Works site, St Davids	Not specified	1999				1
	North of Twr-y-Felin, St Davids	Unspecified	1999(0)	September 1999	26	June 2004(5)	
	Glasfryn Lane, St Davids	90	1999				⌚
	North of Burgage Green Road, St Ishmaels	Unspecified	1999(2)	May 2001	5	June 2001(-1 year)	
	Adj to the School, St Ishmaels	40	1999 (part)				⌚
	Brynhir, Tenby	168	1999				⌚
	Cotton's Yard, Trefin	4	1999				1
	The Incline, Saundersfoot	35	2006	June 2001	48	June 2005(4)	
	Upper Park Road, Tenby	4	2010(1)	July 2011	14	March 2015(4)	
	White Lion Street/ Deer Park, Tenby	74	2010(1)	July 2011	48	April 2014(3)	
	Sergeant's Lane, Tenby	5	2010				⌚
	Rear of the Cambrian, Saundersfoot	37	2010(3)	November 2013	29	April 2014(1)	
	Land NE of Marine Road, Broad Haven	35	2010				⌚
	Part of Buttylands, Manorbier Station	15	2010				⌚

	Allocations for housing	Number of units ³	First Allocated (years to permission ⁴)	Date planning permission first granted	Number of units	Development commenced (years from permission where not completed) ⁵	Development Completed(years to completion from commencement) ⁶
	Former Cottage Hospital Site, Tenby	10	2010(5)	September 2015	10		
	Rectory Car Park, Tenby	50	2010				†
	West of Narberth Road, Tenby	25	2010				⌚
	Butts Field Car Park, Tenby	80	2010				†
	Reservoir Site, Tenby	12	2010				?
	Depot Site, Crymych	15	2010(4)	June 2014	18	October 2015(1)	
	North of Feidr Eglwys, Newport	20	2010(5)	November 2015	35		
	Adj Ysgol Bro Dewi, St Davids	10	2010				†
	South of Driftwood Close, Broad Haven	8	2010(5)	November 2015	10		
	East of Herbrandston Hall	12	2010				?
	North of Landway Farm, Jameston	7	2010	August 2008	6	November 2013 (5)	
	Opposite Bush Terrace, Jameston	35	2010				⌚
	Green Grove, Jameston	5	2010				⌚
	Adjacent to Home Farm, Lawrenny	30	2010				⌚
	Opposite Manorbier VC School, Manorbier Station	19	2010				⌚
	Rear of Cross Park, New Hedges	30	2010(5)	August 2015	31		
	Bank House, Solva	12	2010				†
	North of Heol Crwys, Trefin	15	2010				?

46. The table shows that of the 45 sites allocated in 3 development plans, only 5 (11.1%) have been completely developed. A further 10 (22.2%) are under construction and 5 more have planning permission granted (11.1%). The reasons for sites not being brought forward for development vary, but frequently are due to the landowner not wishing to develop the site at all – or not at the present time.

47. Reasons, where known are indicated by the symbols in the last column of the table, as follows:

- ⌚ Landowner is in discussion with the Authority about developing the site but needs more time;
- ↑ Landowner does not wish to develop the site;
- ? Landowner is unknown;
- 1 Site is now used for other purposes;

Affordable Housing Group

48. The Affordable Housing Group was formed in 2004/5 and is well established. It takes its membership from representatives of the Housing and Planning Divisions of Pembrokeshire County Council, Forward Planning in Pembrokeshire Coast National Park Authority, and each of the Registered Social Landlords with development status in the County. The remit of the group is to focus on delivering a programme of affordable housing in the county.
49. The group will be used as a key stakeholder group for commenting on affordable housing provision in the Local Development Plan review (agreed Affordable Housing Group Meeting 12th February 2015).

Rural Housing Enabler

50. There is no longer a Rural Housing Enabler in post in Pembrokeshire.

Pembrokeshire Community Land Trust

50a Working with communities the Pembrokeshire Community Land Trust pilot project aims to deliver genuine, permanently affordable homes and land owned and run by local people. The Officer will lead teams for housing and land development and supporting partnership development across the sector.

Contact Joanna Rees-Wigmore

email: jorees@planed.org.uk

Performance on Affordable Housing Delivery

51. The target for affordable housing delivery in the adopted Local Development Plan is 530 affordable houses over the Plan period with 80% of the provision planned for delivery by the end of the financial year 2014/2015 to be either built or under construction.⁷ This would mean that an estimated 228 affordable dwellings would need to have been built between 2007 and 2015 or be under construction. This would be an estimated 28 affordable dwellings to be completed annually to achieve the Plan's target provision.

⁷ Appendix 4 Monitoring Local Development Plan 1

52. Between 2007 and 2015 a total of 81 affordable dwellings have either been completed or are under construction.

53. The table below provides further breakdown.

Table 3 Affordable Housing 1st Local Development Plan Targets

	Target Annual Completions	Completions Recorded	Target Annual Affordable Completions or u/c	Affordable Completions or u/c recorded
2007-2008	90	105	28	7
2008-2009	90	86	28	15
2009-2010	90	37	28	12
2010-2011	90	27	28	3
2011-2012	90	36	28	0
2012-2013	90	38	28	0
2013-2014	90	44	28	3
2014-2015	90	90	28	41
Total	720	463	224	81

54. **Building rates & Local Development Plan targets:** Between 1999 and 2009 the Plan's completion rate was an average of 89 per annum (see 1st Plan's Housing Background Paper). It was anticipated that the provision figure of 1,349 would deliver an estimated 90 units per annum over the Plan period with the flexibility of an additional windfall provision of 250. Building rates fluctuate significantly in Pembrokeshire and there has been a considerable drop in completions during the recession. These build rates suggest that the development industry in Pembrokeshire is largely responsive to the overall housing market and the economy. Development in Pembrokeshire is largely bespoke rather than speculative. Looking at historic building rates in the National Park a consistent building rate of 90 per annum has never been reached.

55. Listed in the Local Development Plan's monitoring section (LDP1) is a provision for 1,600 dwellings which included the windfall figure. This figure requires revision at the very least to take account of what the local house building industry rate is likely to be and to acknowledge that this will fluctuate annually. This in turn will impact on affordable housing delivery targets.

56. In terms of windfalls the Home Builders Federation advise that in terms of the relationship between windfalls and allocated sites the Home Builders Federation would suggest that if there is a good range of deliverable allocated sites then the reliance on windfall site, certainly for new build reduces and vice versa.

57. **Affordable Housing Contributions:** The current Supplementary Planning Guidance on affordable housing (November 2014) sets out the Authority's approach on affordable housing contributions on single dwellings. This element of affordable housing provision is intended as a minor part of the affordable housing provision for the Plan period.

Joint Unitary Development Plan Inquiry Inspector's Report - Local Needs Policy

58. A policy was proposed through the Joint Unitary Development Plan to limit the provision of new housing to meet the needs of local people this to be secured by planning obligation.

59. The policy attracted objections covering a variety of considerations from the Welsh Assembly Government and a wide range of other bodies, organisations and individuals.

60. The approach failed because:

- It made an artificial distinction between affordable housing for local people and housing for local people. The provision was in effect affordable housing provision.
- Shortfalls in provision were not to found across the National Park.
- The Park could rely on the strategy of the Plan to deliver a substantive increase in supply outside the National Park in the remainder of Pembrokeshire.
- 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.
- The amount of housing the Policy could provide was negligible.
- The operation of the policy would be complex and practically unworkable.
- The policy strays into areas that go beyond straight forward land use planning.
- 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.
- 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.
- As there was insufficient evidence to justify the inclusion of the Policy (known as 'Policy 47') in the Plan an infringement of human rights would arise if the policy was adopted.

(paragraph 3.48.1 to 3.48.17)

61. More recent proposals for this type of policy in Wales by the Brecon Beacons National Park Authority were not included in the adopted Local Development Plan.

'5.25 Policy 15 'Local Needs Housing within Limited Growth Settlements' and Policy SP6 of the submitted LDP proposed to enable either affordable housing or local needs housing in Level 4 'Limited Growth' Settlements where it can be proven that there is not a need for affordable housing in the area. Little evidence was submitted to support the need for this type of housing and it would be unlikely that it could be demonstrated that there was not a need for affordable housing, given the identified requirement.'

5.26 PPW refers to local housing needs for market housing. However, it makes clear that this type of housing would normally have no occupancy condition. Also, that such a departure from national policies would need to be justified with robust evidence. Policy 15 of the submitted Plan would require development enabled through the policy to be tied by occupancy conditions or S106 Planning Obligations. It thus does not comply with PPW. Moreover, given the conflict with PPW, it would be unlikely that local needs housing could be considered to serve a useful planning purpose.

5.27Consequently, such a condition or obligation would be unlikely to meet the requirements of WG Circular 35/95 'The Use of Conditions in Planning Permissions' and WG Circular 13/97 'Planning Obligations' and the statutory tests set out in Regulation 122 of the CIL Regulations 2010 (as amended). In these circumstances, it could not be guaranteed that such housing would not be released onto the open market. Changes to Policy SP6 (and the supporting text) to delete reference to local needs housing and to require affordable housing in Level 4 Settlements and deletion of Policy 15 as proposed by MAC-6-7, MAC-6-10 and MAC-6-15 would ensure that the Plan is consistent with national planning policy.'

5.27a: More recently two Examinations have been considering similar proposals.

Paragraph 9.2.4 of Planning Policy Wales advises that local 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 in specific locations. 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), local planning authorities will need carefully to justify the variation with robust evidence that they deem appropriate. The justification might be in terms of, for example, land supply, environmental or social impacts in combination. Evidence could be adduced from local studies such as those deriving from the community strategy, or from studies forming part of the evidence base for the development plan. The sustainability appraisal, including the Strategic Environmental Assessment, would be part of the evidence base providing justification for a departure from national policy.

5.27b: Below are links to the Gwynedd / Anglesey LDP - please see Policy TAI 5.
At Swansea's Local Development Examination, there have been a few
discussions on their proposed Policy H5 Local Needs Housing policy to date with
action points requiring further details etc.

Gwynedd and Anglesey's LDP Policy TAI 5 Local Market Housing

<http://www.anglesey.gov.uk/Journals/j/v/e/Anglesey-and-Gwynedd-Joint-Local-Development-Plan---Written-Statement.pdf>

Swansea's proposed Policy H5 was discussed at;

Hearing session 3; Housing

<https://www.swansea.gov.uk/article/37775/Hearing-3-Thu-8-Feb-2018-at-1000-Housing>

See Council and WG's response to question 4C and action point AP3.4

Hearing session 4; Affordable Housing

<https://www.swansea.gov.uk/article/37777/Hearing-4-Fri-9-Feb-2018-at-1000-Affordable-housing>

See Council and WG's response to question 8 and Doc ED032

Hearing session 15: Reserve session

<https://www.swansea.gov.uk/article/37799/Hearing-15-Wed-28-Mar-2018-at-1000-Reserve>

Action point 15.3

Welsh Government Housing Projections (see Scale and Location of Growth Background Paper)

Development Appraisal Toolkit

62. The National Park Authority's preferred approach is to use the Wales-wide Development Appraisal Toolkit (DAT). This is a bespoke version for Wales which is based on AGA: 3D Toolkit and which is the industry standard model used in England.

Housing Density and Number of Bedrooms

63. In terms of density of development a look a sites completed or still active since for the first Local Development Plan 2007 shows the following:

[Housing Background Paper November 2018TypoEdit.docx](#)
Housing Background Paper November 2018

Table 4 Average Densities⁸

Sites with a Capacity of 5 or more units	Average Density per hectare
Greenfield Sites – New Build	47 15.5
Brownfield Sites – New Build	79 52.62

64. Looking at completions between 2007 and 2011 there was a reasonable range of provision in terms of number of bedrooms.

Table 5 Number of Bedrooms in Completions 2007 to 2011

Number of Bedrooms	Unknown⁹	1 bed	2 bed	3 bed	4 bed	5 + bed
Travel to Work Area						
Haverfordwest & Fishguard	5	4 (5%)	20 (24%)	38 (45%)	19 (23%)	3 (4%)
Pembroke and Tenby	19	36 (25%)	62 (44%)	24 (17%)	19 (13%)	1 (1%)
Cardigan			2 (50%)		2 (50%)	
All	24	40 (17%)	84 (37%)	62 (27%)	40 (17%)	4 (2%)

Assessment of Need by the Local Housing Market Assessment

65. The 2014 Local Housing Market Assessment is available as a table on County Council's Monitoring webpage:

<https://www.pembrokeshire.gov.uk/adopted-local-development-plan/implementation-and-monitoring>

66. This information is from the Council's Housing Department. It is a table which sets out for each Community Council the need for affordable housing (rented and LCHO), by bedroom number. The main input into the Local Housing Market

⁹ Number of bedrooms are not included in the percentage calculations

Assessment is the evidence from the Common Housing Register, but it also includes data/other factors from additional sources and is therefore a more robust source than simply using the Common Housing Register. The table shows the need **per year** for the next 5 years (up to 2019).

67. At present when looking at whether or not there is an identified need in an area (for planning application purposes), both planning authorities consider the community council that the application is and its adjoining community councils for rural areas (the towns are self-contained areas). Appendix 1 of the Housing Background Paper provides a breakdown of need for the National Park area by community area.
68. The current Local Housing Market Assessment advises of a need for 371 affordable units **per annum** for the period 2014 to 2019 in the National Park.

Pembrokeshire County Council 2015 Gypsy Traveller Accommodation Need Assessment Draft (2015 GTANA)

69. When compared with Wales as a whole, Pembrokeshire has a relatively large resident Gypsy and Traveller population, as demonstrated by previous accommodation needs assessments, caravan count surveys and the 2011 Census.
70. Surveys were undertaken in October and November 2015 for this accommodation needs assessment, following a methodology agreed by the Steering Group. Surveys included residents on Local Authority residential sites; a Local Authority transit pitch; private sites; unauthorised encampments; and developments; and tenants in 'bricks and mortar' accommodation. The Travelling Showpeople community was also included in the survey, with the timing of the survey coinciding with the Pembroke Fair.
71. 118 households completed the survey, one of whom was based outside Wales. 23 households refused to take part in the survey. The Council was aware of 183 households based in Pembrokeshire. Of these households, 140 responded (including the 23 refusals), giving an overall response rate of 77%.
72. An unmet need for 32 residential pitches, plus two Travelling Showpeople's yards, over the next five years (by the end of 2020) has been identified in this assessment. Over the Plan period for PCC and PCNPA (up to the end of 2021) this equates to a need for 37 residential pitches and two Travelling Showpeople's yards. The unmet need over the period up to the end of 2031 for the pending PCNPA and PCC Plans is projected to be 101 pitches, plus the two aforementioned yards.
73. Respondents to the survey also generally identified a need for more transit pitches and sites in Wales. The Authority considers that the questions within the survey surrounding need for transit pitches/sites are not comprehensive enough to establish meaningful results for this aspect of the survey. It considers that

these questions should be improved for future surveys. These concerns will be fed back to Welsh Government.

74. **Next steps:** The Council has analysed the responses which identified a need for additional accommodation. To help to plan future provision, this need has been grouped into three geographic areas. These are: Haverfordwest, Pembroke/Pembroke Dock and Kilgetty.
75. These areas reflect the general locations within which residents have expressed a desire to live. Although there are family connections between areas, typically residents have a closer association and a preference to live within one area, usually linked to the existing Local Authority site in that area.
76. The more significant areas of need are in the Pembroke/Pembroke Dock and Kilgetty areas which reflect the locations of the two larger Local Authority sites.
77. Planning permission for an additional nine private pitches is already in place in the Pembroke and Pembroke Dock area.
78. To address the need in the Kilgetty area Pembrokeshire County Council has identified an allocation for 15 pitches as an extension to the Kingsmoor Common site within its Local Development Plan. This area is currently common land and is the subject of an application to de-register and enclose the common. Initial information from Welsh Government suggests that a decision on this application should be received by the end of 2015. If successful, the Authority can then progress a planning application and bid for grant funding for this site. Delivering additional pitches in this area would meet a significant proportion of the need identified.
79. As well as progressing the Kingsmoor Common allocation, over the next year the Local Authority will look at the potential to deliver a number of smaller sites to meet the need identified in this report. Desk-based geographical information system (GIS) appraisals of Council-owned land have already taken place and further analysis of potential sites will be progressed. The Authority will also closely examine the results of the surveys from private sites and explore whether there is any potential to expand existing private sites. Where unauthorised encampments and unauthorised developments have been identified officers will seek to work with residents to apply for planning permission and regularise the site (where appropriate). Pre-application discussions are already taking place in some cases.
80. Both PCC and the PCNPA have policies which allow for private sites to be developed where they meet certain criteria. The vast majority of existing sites are located outside the PCNPA; only one private site with planning permission exists within the National Park currently.
81. In recent years a significant number of private sites have gained planning permission under this policy framework. Inevitably issues surrounding landscape are a greater constraint within the National Park than it is outside; an appeal against a decision by PCNPA to refuse planning permission for a private site at [Housing Background Paper November 2018TypoEdit.docx](#) [Housing Background Paper November 2018](#)

Manorbier was dismissed because of the impact on the landscape in November 2015. A further site within the National Park, near Manorbier Newton, is now also undergoing the appeal process.

82. Progress on delivery towards meeting the identified need in this report will be reported on annually within the PCC and PCNPA LDP Annual Monitoring Reports, which are publicly available.
83. PCC will continue to monitor instances of unauthorised encampments and will review data provided from the Caravan Count central database during the lifetime of this GTAA to ascertain if there is evidence of need for transit sites and/or temporary stopping places and where these should be located.
84. Officers here are liaising with the Council's Gypsy & Traveller Accommodation Assessment Steering Group during the revision of the Local Development Plan.
85. An opportunity to help address the shortage of gypsy and traveller sites has been provided with the National Park Authority inviting the submission of sites as part of the Candidate Site submission process. No sites were submitted for consideration.

Housing Land Supply

86. **Appendix 2** Land Supply at April 2016-2018 (by site) & Trajectory:
 - Identifies land with permission April 2016-2018 (including affordable housing)
 - Identifies housing land allocations
 - Includes a forecast of completions on 5+ sites for 2018 to 2021, 2021 to 2026, and 2026 to 2031.
87. **Appendix 3** sets out a table on land availability over the Plan period. The Technical Advice Note (TAN) 1 notes that whilst local planning authorities should not undertake the JHLAS process at the LDP examination, it is appropriate for evidence-based assumptions about housing land availability to be included within the Local Development Plan.
88. The methodology applied for calculating the land supply within Appendix 3 follows the established approach as identified within TAN 1. The process involves comparing the amount of land that might be considered to be genuinely available for any given 5 year period with the amount of land that is needed for that period of time in the context of the remaining housing requirement identified within the Local Development Plan.
89. Appendix 3 provides the calculations. In calculating the amount of land that can be considered genuinely available for any future 5 year period, the delivery site schedule in Appendix 2 provides a basis for gauging the potential land supply.

Notes to land supply assessment

90. The following notes provide an explanation to the numbers, assumptions and calculations contained within the land supply assessment in Appendix 3.

A: Year

B: The number of years remaining of the plan period at the end of the current year

C The level of housing requirement as identified within the Deposit Local Development Plan

D The actual number of completions recorded on allocated sites in the Deposit Plan.

E (1) and (2) The number of completions recorded on other large sites during the first 3 years of the plan period. These are sites which have or had an original total capacity of 5 or more housing units (large) or less than 5 (small).

F The anticipated number of units to be completed from land with planning permission. This includes allocations with planning permission as at April 2018.

F The actual number of small site completions during the first 2 3 years of the plan period.

G The anticipated level of new housing completions on Allocation Sites. This number corresponds to an annualised completion figure taken from Appendix 2 – see Table 'Totals from Site Table & Windfalls from Table 5 Deposit LDP Market and Affordables Totals.'

H (1) and (2) These two numbers relate to the anticipated rate of new housing delivery through the development of windfall large and small sites over the remaining years of the plan period - see Appendix 2 Table 'Totals from Site Table & Windfalls from Table 5 Deposit LDP Market and Affordables Totals.'

I This figure is the total number of completions anticipated when all the components are aggregated with a 15% flexibility allowance adjustment.

J The total cumulative number of completions anticipated for the plan years thus far.

K The residual housing requirement is the number of housing units to be provided in the remaining years of the plan period, when the cumulative number of completions are subtracted from the original level of housing need requirement.

L The number relates to the revised annual housing requirement for the remaining years of the plan period. The last 4 years calculation reflects Table 4 of Technical Advice Note 2.

M Total land required for the following 5 year period.

N This is the land available on Local Development Plan allocated sites for the following 5 year period. This number corresponds to an annualised figure taken from Appendix 2 – see Table ‘~~Totals from Site Table & Windfalls from Table 5 Deposit LDPMarket and Affordables Totals.~~’

O This is the estimated availability of land on large windfall sites for the following 5 year period. This number corresponds to an annualised figure taken from Appendix 2 – see Table ‘~~Totals from Site Table & Windfalls from Table 5 Deposit LDPMarket and Affordables Totals.~~’

P This number corresponds to an annualised figure taken from Appendix 2 for small sites – see Table ‘~~Totals from Site Table & Windfalls from Table 5 Deposit LDPMarket and Affordables Totals.~~’

Q¹⁰ This number corresponds to an annualised figure taken from Appendix 2 for land with planning permission on 5+sites.

Q_R This number provides an aggregated number of available plots for the following 5 year period.

R_S This is the land supply expressed in years.

91. The level of new housing provision recorded during the first 2-3 years of the plan period is shown through using the completion figures for each Year. Year 3 shows what is anticipated in terms of completions.
92. For the years 2026/27, and for subsequent years up to 2031, providing a conventional land supply calculation is problematic. This is because less than 5 years of the plan period remain but a level of housing land required would still need to be calculated for a full 5 year period. This would ordinarily involve the level of housing need being extrapolated beyond the end of the plan period. However, the Local Development Plan is only seeking to identify and meet the need for new housing up to 2031 and is not identifying land to meet need arising beyond 2031. Consequently any land supply calculation for years 12 onwards would likely reflect a relatively high level of need for the next 5 year period when compared with the relatively low level of available land.
93. Appendix 3 however identifies that the level of residual need at the end of 2025/26, the 11th year of the Local Development Plan, is expected to stand at just under 300 units whereas the amount of land expected to be available for development, including allowances for small sites and windfalls, stands at just over 300 units ensuring that the overall level of housing need within the Local Development Plan will be met by 2031.

¹⁰ Edit 7th of June 2019 – description of Row Q in Appendix 3 added. Rows beneath relabelled to match Appendix 3.

Completion Rates

94. Historic completion rates per annum are shown in the table below. Building rates fluctuate significantly in Pembrokeshire and there has been a considerable drop in completions during the recession. These build rates suggest that the development industry in Pembrokeshire is largely responsive to the overall housing market and the economy. The building trade in the Pembrokeshire Coast National Park is small scale in nature. To date (February September 2018) no volume builders have developed sites here.

Table 6 Housing Completion Rates 2003 to 2015

Year	Housing Completions	Rolling 10 year Completion Rate
93To94	99	
94To95	94	
95To96	68	
96To97	60	
97To98	59	
98To99	120	
1999 to 0	117	
2000 to 1	84	
2001 to 2	117	
2002 to 3	105	92
2003 to 4	93	92
2004 to 5	50	87
2005 to 6	87	89
2006 to 7	57	89
2007 to 8	105	94
2008 to 9	86	90
2009 to 10	37	82
2010 to 11	27	76
2011 to 12	36	68
2012 to 13	38	62
2013 to 14	44	57
2014 to 15	90	61

95. Historically there is some correlation between completion rates and periods of growth and recession. However, there are other fluctuations as well which are difficult to unpick.

Contingency

96. A 10% level of contingency provision is generally accepted as providing a reasonable element of flexibility in development plans when tested in current Examinations. Inspectors also take into account the circumstances of individual Plan areas and Brecon Beacons National Park Inspector's report refers to accepting a lower percentage because in part the possibility that the sites in the Plan may not deliver as anticipated has to be balanced against the impact of allocating additional land in the sensitive landscape of the National Park.

Appendix 3 illustrates that a 15% contingency is available above the housing requirement based on the information regarding sites currently available (November 2018)

References

National Planning Policy & Guidance

[Welsh Government | Planning policy and guidance](#)

National Park Policy Statement 2007

<http://www.pembrokeshirecoast.wales/default.asp?PID=761>

Taking Wales Forward 2016-2021

<http://gov.wales/docs/strategies/160920-taking-wales-forward-en.pdf>

Ageing Well in Pembrokeshire January 2016

<https://www.pembrokeshire.gov.uk/social-care-whats-available/full-of-life-at-50-plus>

Pembrokeshire Coast National Park - SPG

Affordable Housing Supplementary Planning Guidance

Low Impact Supplementary Planning Guidance

Affordable Housing Delivery Report

Pembrokeshire Local Housing Market Assessment Final 2014

<https://www.pembrokeshire.gov.uk/adopted-local-development-plan/implementation-and-monitoring>

Gypsy Traveller Assessment of Need 2015

<https://www.pembrokeshire.gov.uk/local-development-plan-review/lbp2-evidence-base>

Pembrokeshire County Council Supplementary Planning Guidance

Affordable Housing

<https://www.pembrokeshire.gov.uk/adopted-local-development-plan/lbp-supplementary-planning-guidance>

Pembrokeshire Single Integrated Plan

<https://www.pembrokeshire.gov.uk/public-services-board/local-service-board-archive>

Mobile Homes (Wales) Act 2013 and the Explanatory Notes to the Act can be found on the [National Assembly for Wales](#) website

Pembrokeshire Wellbeing Plan

<https://www.pembrokeshire.gov.uk/public-services-board/well-being-plan>

These weblinks were accessed on the 2 November 2018