

**Pembrokeshire Coast National Park
Replacement Local Development Plan (2015-2031)
Public Examination**

**Support Document
Appendix 08**

before Inspector: Mrs Nicola Gulley MA MRTPI

**Representations by and on behalf of the
NEWPORT AREA ENVIRONMENT GROUP (NAEG)**

Secretary : Mrs. Sandra Bayes

Agent/Representative Mr. Robert L. MANSON

**NEWPORT AREA ENVIRONMENT GROUP (NAEG)
Support Document Appendix 08**

Calculating the Housing Need in Newport

**first produce for Preferred Strategy Stage - 2017
for oral presentation
on 2nd July 2019**

Part I : Calculating the Housing need in Newport

“We don’t calculate how many houses are needed in a particular area first, and then allocate housing land accordingly. That’s not how it works. We assess each of the local representative proposals for their environmental capacity and other critical characteristics in planning terms, and make a determination on each separate proposal. “

Mr Richard James PCNPA Park Direction Team,
Public Meeting, Newport Memorial Hall, 4th July 2017

“9.1.4 Local authorities must understand their whole housing system so that they can develop evidence-based market and affordable housing policies in their local housing strategies and development plans. They should ensure that development plan policies are based on an up-to-date assessment of the full range of housing requirements across the plan area over the plan period. Local authority planning and housing staff should work in partnership with local stakeholders, including private house builders, to produce Local Housing Market Assessments (LHMAs)⁶. LHMAs must include monitoring so that responses to changing housing requirements can be reflected in updated development plans and housing strategies.”

§ 9.1.4 Planning Policy Wales (8th Edn.) 2016

So what have the Parks done to fulfil this clear legal obligation ?

They have entered into an arrangement with the County, as the local housing authority with housing jurisdiction in the Park, to effectively delegate to them responsibility for the production and upkeep of a joint **Local Housing Market Assessment** for both the Park and the rest of the County, subject to review by a joint committee working to a common programme.

The County last produced such a document as long ago as **2012**, now some **5years** out of date, and which appears to have been even then only an update on their earlier paper **LHMA 2007** concentrating on analysis solely of the need for so-called ‘affordable housing’ in the County¹. However, it is a commendably detailed and scoped piece of work, and reaches the following global conclusion on general housing projections for the entire County (see @ p.11) as follows:

*8.2 This indicates that an additional **5,640 households** will be formed between 2011 and 2021, so an additional **564 households** on average per annum for 10 years will require accommodation.*

Accordingly, it makes no attempt to project or predict housing needs beyond the year **2021**, which is when this new replacement LDP for the Park is **to start** to come into effect. It also makes no separate and distinctive detailed analysis of the factors bearing only upon the housing needs peculiar to the Park at all, and most significant it offers no breakdown whatever of the assessed global housing needs (not just affordable needs) for each separate individual community council area within the County, such as here in Newport.

¹ <https://goo.gl/4oJn7C> see now @ § 1.2 on p.3

On the Parks website in Background Papers relevant to the Replacement LDP there is a paper titled “*Background Paper No *: Housing*” and dated February 2016. In the section in this titled “*Assessment of Need by the Local Housing Market Assessment*” to be found on p.21, one is then told that a “**2014 Local Housing Market Assessment**” is available as a table on the County Council’s Monitoring webpage with a link. In truth, however, when one goes there, this is nothing more than a single table, setting out figures for asserted ‘*affordable housing*’ needs alone (Social rented & LCHO sectors), divided as per each community council area in the County. For Newport the tabular figures are as follows:

PCC Local Housing Market Assessment (2014)
Housing Need per year 2014-2019 ²

Community Council Area	Affordable Rented						LCHO (Low Cost Home Ownership)					
	1 Bed	2 Bed	3 Bed	4 Bed	5 Bed	6 Bed	1 Bed	2 Bed	3 Bed	4 Bed	5 Bed	6 Bed
Newport	18.8	1.8	0.0	0.7	0.4	0.0	1.9	0.0	0.0	0.0	0.0	0.0

http://www.pembrokeshire.gov.uk/objview.asp?object_id=11291&language=

No basis for justification or explanation for such figures is provided

No information whatever addressing asserted housing needs, other than for so-called ‘affordable needs’, are given or indeed the subject addressed at all.

In respect of its duty to monitor the implementation of its own LDP for the County (excluding then the Park) PCC has quite properly produced several subsequent updated Reports (post 2012), analysing the topic of so-called ‘Land Availability’ (termed ‘**Joint Housing Land Availability Studies**’ = “**JHLAS**”), which look at the other-side of the coin, as it were, to housing markets and needs, by analysis of current planning permissions granted and the rate of actual house building. However, perhaps not too surprisingly despite its being termed a ‘joint’ Study (given this is intended as monitoring of their own County only based LDP) all the specific site details dealt with over the years by these PCC Reports are only in relation to communities located in the County but outside the Park, ie excluding then Newport among others.

So then to summaries:

- **No contemporary Assessment of the Housing Market here in Newport**
- **No analysis whatever of the Market structure specific here to Newport**

As Mr James comments “*We don’t calculate the number of houses needed in a particular area. ... That’s not the way it’s done.*” **Only thing is that’s way it’s supposed to be done !**

It is perhaps informative at this point to refer back for a moment to the general attitude adopted and expressed by PCNPA to the future needs for housing in the Park, back in 2010, when the current LDP was in its latter stages of development.

² PCC Website titled [Local Housing Market Assessment 2014](#)

*“2.24 PCNPA stated in its Deposit LDP that “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”¹. It had however proposed a housing provision of around 1,756 dwellings for the period 2007-2021, on the basis that to meet the “significant need for affordable housing in the National Park”² it must provide land for the development of housing. The adopted Plan proposes that a minimum of 530 of these will be affordable homes.”*

(emphasis added)

**Background Paper for Local Development Plan:
Scale and Location of Growth (Dec2010)**

That is to say the Parks recognised that there was no demographic or population change need whatever for further new housing in the Park (2007-2021), but solely in order to aim to build 530 new affordable homes, for those in the Park recognised to be in need of such housing, it in fact then agreed to the building of **x3.3 as many** new homes, ie **1,756**. In the event, even this minority rate of affordable housing provision, proved wholly unobtainable –

*“2.3 Set against this level of current and emerging need for affordable housing, only 21 of the 289 dwellings to have been built in the National Park Authority area between 2007 and 2013 were affordable homes. This represents just 7% of the total housing supply and equates to 3 affordable dwellings per year being built in the National Park Authority area, compared to a target of delivering an average of 35 affordable dwellings per annum over the LDP period (2006- 2021). **Clearly affordable housing needs are not being met.**”*

Report to PCNPA on Supplementary Planning Guidance
on Affordable Housing (Nov. 2014)³

Here for instance, in Newport, the need for affordable only accommodation was originally recognised to be so great that a proportional limit of **70%**, of any new housing project of greater than +2 units, for affordable needs was originally imposed by the current LDP⁴. However, within a couple of years of the adoption of the new LDP (in 2010) such was the slow rate of affordable house building uptake by the local house building sector, that the Park’s commissioned (at great local tax payer’s expense) a pair of private-sector Cardiff based planning consultants to come up with a Report on the need to adjust Affordable Housing targets. As a result of which that figure was then slashed in 2014 from **70%** to just **40%** instead, the exact proportion of so-called ‘affordable housing’ now approved for the massive ‘Bentinck Development’ project (14/35). **Needless to say no one in Newport was consulted by these outside Cardiff consultants.**

Clearly, then the major so-called ‘driver’ to use the jargon in this housing debacle to-date is the perceived need to provide so-called ‘Affordable housing’ ; and it must then but worth a short while specifically addressing what is meant by, and involved in, meeting this so-called need.

“Affordable Housing”

So far as planning guidance in Wales is concerned the most authoritative definitions are those provided @ §5.0 in the WG Technical Advice Note #2 on ‘Planning and Affordable Housing’, as follows:

³ Nathaniel Lichfield & Prtnrs. & Andrew Golland & Assocs. see @ § 2.3 on p.3

⁴ See now @ Policy 45(a) in the current PCNPA LDP (2010)

“ 5.0 Affordable housing and land use planning

5.1 The definition of ‘affordable housing’ for the purpose of the land use planning system as described in this Technical Advice Note is

housing where there are secure mechanisms in place to ensure that it is accessible to those who cannot afford market housing, both on first occupation and for subsequent occupiers.

...

Affordable housing includes:

- Social rented housing;
- Intermediate housing.

5.2 Social rented housing is that provided by local authorities and registered social landlords. Intermediate housing is that where prices or rents are above those of social rent but below market housing prices or rents.”

For many Authorities, including especially the UK Department for the Environment, Communities & Rural Affairs, “Intermediate Housing” can where appropriate include, but is not necessarily limited to, what is described as “**Low Cost Home Ownership**” (“**LCHO**”) housing. However, TAN2 (Glossary) also makes it clear that “*Intermediate housing differs from low cost market housing, which the ..[Welsh].. Assembly Government does not consider to be affordable housing for the purpose of the land use planning system.*”

Who decides what is and what is not “affordable” in a given locality & market ?

Clearly just saying that ‘Affordable Housing’ is defined as “*housing accessible to those who cannot afford market housing*” doesn’t really tell you a whole hell of a lot about precisely how much cheaper than market housing should housing be to qualify as “affordable”, especially in a particular locality & market sector, meaning primarily the size of house and generally judged by the number of separate bedrooms provided.

TAN 2 says that :

“ 4.2 Local authorities should calculate affordability for each of the housing markets that may be operating in their area (and those of neighbouring authorities, if appropriate)⁸. It can then be used, along with other data from the development plan preparation process, to calculate the amount of affordable housing required from new build housing over the plan period.”

and the Welsh Government even provides specific guidance for Local Authorities, within that part of the **Local Housing Market Assessment Guide** on Affordable Housing.

What have the Parks done to fulfil this further legal requirement ?

So far as I have been able to determine it, from an extensive study of the so-called 'background papers' offered by the Authority on its website, both in relation to the proposed replacement LDP (2021-31), and the current LDP (2010-21) and elsewhere – **absolutely nothing**.

Instead, it would appear to be the general attitude among the planning staff that in order for housing to be properly regarded as 'affordable' it has to be in effect social rented housing owned and operated by a recognised so-called '**Residential Social Landlord**' ("RSL"), and when it comes to determining the actual cost of such accommodations, in pounds and pence, (and as a proportion of the actual cost of equivalent 'open-market' housing of a comparable size in the same locality) that is their business and not the Parks.

However, at first flush, at least it would appear that they have put out material on the website dealing with at least the 'need' for affordable housing and equally the so-called 'land availability' (ie rate of planning permissions & completions) and as to this latter both in relation to affordable and indeed open market housing as well. Alas, when views the material in detail the truth is far less comprehensive. As appendices to the so-called " *1st Review Background Paper No *: Housing* ", as previously mentioned, they offer the following two further Papers, as follows :

Appendix 1

Housing Need and Supply April 2015

Identifies affordable housing need by Community Council area

Identifies Pembrokeshire Coast National Park affordable housing supply

(to be included in the Deposit Local Development Plan)

Identifies Pembrokeshire Coast National Park housing land supply

(to include land with planning permission and land allocations).

to be included in Deposit Local Development Plan (replacement).

Identifies total housing land supply

including affordable housing supply in Pembrokeshire County Council's planning jurisdiction.

(to be included in the Deposit Local Development Plan)

So in point of fact most all of the material which the public would find most useful in judging the current housing land allocations which the Parks are now proposing under this current 'Preferred Strategy' process, are absent - not be included until next year at the earliest as part and parcel of the so-called 'Deposit Plan' stage instead. In so far as this Appendix 1, which is nothing other than a large table, tells us anything about 'affordable housing' needs here in Newport it states as follows:

PCNPA Housing Background Paper –

Appendix 1 : Housing Need and Supply by Community (April 2015)

Community Councils in the National Park	Social Rented	LCHO	Housing need per year 2014 - 2019 Total
	Housing need	Housing need	
	per year	per year	
	2014 - 2019	2014 – 2019	
	# (%)	# (%)	

Newport	22 (92%)	2 (8%)	24
----------------	-----------------	---------------	-----------

Which as you've probably already guessed is in truth nothing more than a simple re-gurgitation, in a different format, of the existing figures already supplied by the PCC in their LHMA (from 2014) as above. Things, alas, don't get any better when we refer to the **Appendix 2** specifically on 'housing land supply', instead.

Appendix 2

Housing Land Supply at April 2016 (by site) & Trajectory

Identifies land with permission April 2016 (including affordable housing)

Identifies land allocations

(to be inserted at Deposit Local Development Plan (replacement) stage)

Includes a forecast of completions on 5+ sites for 2016 to 2021, 2021 to 2026, and 2026 to 2031.

(to be inserted at Deposit Local Development Plan (replacement) stage)

Sites with Planning Permission for residential development as of 31st March 2016

Ref	Site	Total no units Remaining	No Affordable units	
Newport				
NP/09/0488	Newport Garage	9	4	
NP/10/0181	Tyddyn, Dolwerdd, Long Street, Newport	1	0	
NP/13/0311	The Warehouse, Newport	1	0	
NP/10/0361	Llyn y Mynydd, Feidr Pen y Bont, Newport	1	0	
NP/14/0534	Former Coach House, Mill Lane	1	0	
NP/13/0311	The Warehouse	1	0	
Total		14	4	(= 28)

The notorious 'Bentinck development' was approved in principle by the Parks Planning Committee on 6th November 2015, who then delegated the formal process of approval to their Officers. However, they weren't able to finally issue a formal Approval Notice, granting planning consent for x35 houses (of which x14 or 40% only were to be 'Affordable' houses) i.e. twice as many houses again as previously approved in the prior 7 years or so (as above), until a full further 8 months later, on 20th of June last year, 2016, which was just 11 weeks after the cut-off date for this assessment.

Perversely the latest Housing Land Supply Assessment done by the Parks as a part and parcel of their on-going monitoring of the extant LDP instead, is dated just July last year (2016)⁵, and does indeed include a record for the 35 houses on what is described by them as the “**Feidr Eglwys**” site formally given in June last year, producing a housing land supply figure for that purpose, when coupled with the former Newport Garage site development, of **45 units** instead

So, in conclusion :

- **No contemporary Assessment of the Housing Market here in Newport whatever**
- **Specifically no information on open market housing projections and character**
- **No analysis whatever of the market structure specific here to Newport**
- **Information on affordable housing need out-of-date, unjustified and undefined**
- **Information on Land Supply so out-of-date it underestimates extant planning permissions by a factor of 3:1**

Alas, this scale of gross incompetence and inefficiency is only cast into further stark relief, when one compares it to the actual figures, produced relatively recently (2013) by the Welsh Government, in relation to actual statistical projections for housing need in the Park in general, if not then here in Newport in particular.

“ **PCNPA Scale and Location of Growth Paper April 2017**

“ 88. **2013 Population Projections for Wales National Parks:**

More recent population figures published by Welsh Government advise that it is estimated that:

- the number of deaths in each of the three National Parks in Wales is estimated to be more than the number of births

89. **Between 2013 and 2028:**

- the total population living in a National Park in Wales (81,800 in 2013) is estimated to decrease by 5.9 per cent to 77,000

- the Pembrokeshire Coast population (22,800 in 2013) is **estimated to fall by 11.5 per cent**

90. **2013 National Park household projections are set out below:**

Households	2011	2016	2021	2026	2031	Completions 2011 to 15	15 to 31 Projections	Annual Provision
Newport	583	586	572	555	533	2	- 52	- 3

Which is to say that according to the Welsh Government, by the end of the period 2015-31, we will need 52 **fewer** homes here in Newport – not more ! And yet current Parks proposals at this Preferred Strategy stage are for up to **+77** further new homes, of which at best, only 50% will be to meet so-called ‘*affordable needs*’ purposes !!

⁵ See table @ p.8

<http://www.pembrokeshirecoast.org.uk/Files/files/Dev%20Plans/JHLAS/PCNPA%20JHLAS%202016%20Final.pdf>

Pembrokeshire Coast National Park Management Plan (2015 - 2019) Local Development Plan (2015-2031)

1st Review Background Paper No *: Scale and Location of Growth
April 2017

.....

Table 8 Housing Projections for sub areas of the Park (2011 based) Plan end date 2031

88. 2013 Population Projections for Wales National Parks:

More recent population figures published by Welsh Government advise that it is estimated that:

- the number of deaths in each of the three National Parks in Wales is estimated to be more than the number of births
- more people are expected to move to the Brecon Beacons than leave the area; for the Pembrokeshire Coast and Snowdonia more people are expected to leave the area than move in.

89. Between 2013 and 2028:

- the total population living in a National Park in Wales (81,800 in 2013) is estimated to decrease by 5.9 per cent to 77,000
- the Brecon Beacons population (33,500 in 2013) is estimated to fall by 2.7 per cent
- the Pembrokeshire Coast population (22,800 in 2013) is estimated to fall by 11.5 per cent
- the Snowdonia population (25,500 in 2013) is estimated to fall by 5.0 per cent.

90. 2013 National Park household projections are set out below:

Households	2011	2016	2021	2026	2031	Completions 2011 to 15	15 to 31 Projection	Annual Provision
Tenby	2253	2264	2210	2144	2058	83	-278	-19
Newport	583	586	572	555	533	2	-52	-3
Saundersfoot	1200	1206	1177	1142	1096	31	-135	-9
St Davids	851	855	835	810	777	9	-83	-6
Rural Centres & Countryside	5390	5416	5287	5129	4923	83	-550	-37
Total	10277	10326	10080	9780	9387	208	-1098	-73