

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

**before Inspector:** Mrs Nicola Gulley

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

**Secretary :** Mrs. Sandra Bayes

**NAEG member:** Mrs Ros McGarry

**Agent/Representative** Mr. Robert L. MANSON

**Ref: 3778**

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**NEWPORT AREA ENVIRONMENT GROUP (NAEG)**

**Statement of Case**

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**for oral presentation  
on 2<sup>nd</sup> July 2019**

1. Newport – Trefdraeth (the smallest town in Wales) together with its immediate environs, comprises a place of very special natural beauty and coastal amenity to both lift and enlighten the souls of its residents & visitors alike. However, as with so much else in life, having great advantages in one area, brings with it corresponding disadvantage in others; and in this instance the great attractiveness of Newport as a place to experience, both in the short & long term, brings with it a great distortion in the appeal, and thus the cost, of housing. People wishing to live here compete in the open market with some of the wealthiest people in the land to acquire a house.
2. The nature of employment in the area is in the main related to tourism, generated by the area's beauty and historic assets. While the local population is dependent on tourism, it is also its enemy. The level of income that the employment in tourism produces is insufficient to compete with the buyers that purchase residential properties, more often than not as second homes. Whilst developers are able to sell to those in a completely different wealth bracket, there is no incentive to provide homes within the financial reach of local employees – for whom the prospect of buying a home in their own town is virtually impossible.
3. The provision of local Affordable Housing, as a proportion of new build development, is naturally a most welcome innovation in market provision. However, as the statistics which we will supply will prove, as a full-spectrum solution to these complex social and economic problems, the provision of local Affordable Housing ("AH"), has alas proven to be a wholly and woefully inadequate and unachievable ideal. Developers in Pembrokeshire, as elsewhere, are not merely keen but insistent upon 'gaming' the planning system to minimise estate development conditions regarding proportions of AH, to the point where we are now faced with having to accept wholly unnecessarily and unwarrantedly large-scale estate developments<sup>1</sup> which in turn deliver only a minority of houses built to meet AH requirements. Equally, there are many people, whether locals or otherwise, who find themselves in the intermediate category of not meeting the requirements for provision of local AH, but who are completely incapable of purchasing a house at the prices they command here.
4. We are not anti-visitors becoming Newport householders *per se*. We would also stress and emphasise the fact that there is still a large proportion of the existing housing stock in Newport which is in desperate need of renovation and restoration. Particularly with regard to bringing home insulation and energy efficiency in our community up to much higher standards, so that as a community together we may make a better contribution to tackling the climate change challenges which all face collectively. We obviously welcome the contribution by wealthier visitors towards meeting the challenges by way of the purchase of most especially larger existing houses.
5. Equally, it is well appreciated that in such a manner they may well thereby also enable local people in existing homes no longer appropriate to them, most especially elderly local residents, to instead move into smaller houses with only one or two bedrooms, thereby enabling those persons to live out their days in the community much more efficiently and inexpensively.

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<sup>1</sup> such as the 35 unit project approved recently for the 'Bentinck Site' - Land North of Feidr Eglwys which has only 40% committed to Affordable Housing needs.

6. The limitations on further development imposed by landscape and infrastructure restrictions mean that it is imperative that future new build housing is designed to meet the needs of people who wish to live here.
7. Therefore, it was in order to meet these critical demographic and housing characteristics, that we as a local community group decided to propose the idea of an occupancy condition, requiring a “*main or principal residency*” status being required for new build housing in our community. In this respect we readily admit that we were inspired and encouraged by the experience of our Cornish cousins in St Ives, who hit the headlines with a similar policy that they successfully inserted into their neighbourhood development plan (most regrettably not a planning tool available here in Wales) and which they successfully defended on judicial review before the High Court<sup>2</sup>
8. Subsequently we have in recent months been additionally encouraged and bolstered by the comments and approvals granted by Welsh Planning Inspectors in decisions both in a neighbouring county borough of Swansea (regarding housing on the Gower peninsular AONB) as well as in the Anglesey and Gwynedd LDP enquiries, to which reference will be made in our arguments and quoted in a supporting documentation.
9. In seeking to establish a simple principal residency requirement, imposed as an occupancy condition, as distinct and distinguishable from both local AH requirements, and indeed from “local needs” strategies, as promoted and used elsewhere (where instead the intention is to reserve new housing opportunities to established locals only), we aim to achieve a measure of community cohesion, as now required by statutory provision under s.4 of the Wellbeing of Future Generations Act -without wishing to in any way deter or discourage new persons joining our community from away, where they are in turn willing and seeking to make this their permanent future home.
10. In so doing we absolutely reject the suggestion that we are thereby diminishing or deterring the parallel achievement of greater AH provision in this community, when all of those who in practice will be seeking to occupy such housing will, inevitably also be more than likely to satisfy a permanent residency requirement as well<sup>3</sup>. In such a manner we anticipate that the synergy of these related, but distinct policies, will in practice help to achieve both higher rates of AH occupancy and community cohesion in future.
11. In conclusion, we must not forget to mention that whilst we obviously cannot speak with the authority of our local community Council (Newport Town Council), we are happy to inform the Examination that we speak with their full support, their having first brought the proposed amendment to Policy 3a) to the National Park in 2016, notification of which we suppose has been brought to the attention of the Inspector through the usual channels.

We now ask enquiry to turn its attention to the two-page x2pp statement<sup>4</sup> setting out the statistical analysis on the housing situation in Newport, upon which we principally rely to set out the cold hard statistical facts in support of our more emotional but heartfelt plea as now made.

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<sup>2</sup> *R (RLF Built Environment Ltd.) v. Cornwall C.C. & St.Ives T.C.* [2016] EWHC 2817 (Admin) of which copy supplied see now at appendix . . .

<sup>3</sup> seat especially the example of the Swansea Borough County LDP Policy H5.

<sup>4</sup> see Appendix 02 in our supporting documentation