

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

**Support Document  
Appendix 06**

**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

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**NEWPORT AREA ENVIRONMENT GROUP (NAEG)**

**Support Document Appendix 06**

**Swansea LDP Examination**

**Extracts from the Inspectors' Report**

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**for oral presentation**

**on 2<sup>nd</sup> July 2019**

# Swansea Local Development Plan 2010-2025

## Inspectors' Report (p.37)

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### ***Local needs housing and exception sites***

6.23. Policy H 5, as amended by **MAC179**, allocates six sites for the provision of a mix of affordable housing and market housing for local needs. The Council has prepared the policy in response to particular housing pressures faced within the Gower and areas immediately adjacent, where a disproportionately high proportion of local residents, in particular younger residents, cannot afford to compete in the open market and are forced to seek suitable housing elsewhere<sup>87</sup>.

6.24. Evidence prepared by the Council and a consultancy<sup>88</sup> identifies 9 wards in the west of the County that experience particular housing market pressures in comparison to other parts of Swansea. In all of these wards average house prices *..(p.38)..* exceed the Swansea-wide average, substantially so in the case of Gower and Newton. Some wards, for example Pennard, Bishopston and Oystermouth, have an extremely limited number of affordable dwellings. Other indicators point to higher levels of holiday or second homes, higher proportions of larger properties and below-average proportions of smaller homes. Whilst some parties suggest that there may be a case for amending the list of identified wards, we consider that the evidence effectively demonstrates that these 9 wards are subject to specific housing pressures that are not experienced elsewhere in Swansea.

6.25. The allocation of the six sites within this geographic area is consistent with the Plan's overall strategy in relation to housing provision. All allocations have been subject to appropriate SA which has demonstrated that there are no evidently preferable, deliverable sites for the provision of housing to meet local needs. The allocated sites would provide an opportunity, however modest, for some local residents to be accommodated in their communities, which in turn would help to support local facilities and services which rely on a year-round population. The provision of a minimum of 51% social rented and intermediate housing on the allocated sites would work alongside the Plan's affordable housing policies and is justified by the viability evidence.

6.26. The allocations at Scurlage (H 5.1), Pennard (H 5.4) and Thistleboon (H 5.6) are located in the Gower AONB, within which the statutory duty to conserve and enhance the natural beauty of the area applies. To an extent the landscape impact of the allocations would be a matter for the detailed planning application stage. Nonetheless, we are satisfied that the principle of allocating these three greenfield sites is appropriate and justified, having regard to the benefits of providing housing sites of modest scale that would meet specific local needs arising in the west of the County. **MAC362** would, however, add key site-specific requirements and informatives for allocated sites into Appendix 3. This would ensure that key constraints, including landscape constraints, are adequately articulated within the Plan.

6.27. Policy H 5 seeks to restrict occupancy of the market dwellings to persons with a specific connection to the local area. The particular housing market pressures in the subject wards means that there would be a significant financial incentive for qualifying persons to sell a new house on the open market. Were this to happen, the effectiveness of the policy would be undermined. The imposition of an occupancy restriction would, over time, secure a modest pool of market housing that would be available to qualifying persons. This would be likely to be more affordable than open market housing, providing an opportunity for local residents to buy homes whose income means that they are not eligible for intermediate housing but who cannot compete in the locally inflated housing market. In doing so, the policy would also be likely to assist in increasing churn, to the benefit of the local housing market as a whole. We are therefore satisfied that occupancy restrictions are justified in this case and would accord with national policy<sup>89</sup>.

6.28. To fully secure the objectives of the policy, some have suggested that the size of the market housing should be restricted relative to the number of bedrooms. Policy H 5, as proposed to be amended, states that proposals should include an .. (p.39).. appropriate mix of dwelling sizes to meet identified social and/or economic needs, having regard to the most up-to-date local needs evidence. The policy would thus align with the justification and evidence underpinning it and no further change is necessary for soundness.

6.29. Appendix 6 of the deposit LDP provides further information about the operation and enforcement of local needs housing. Changes proposed by **MAC363** and **MAC364** would clarify how legal agreements and conditions would be enforced as well as the eligibility criteria for qualifying persons. Including a definition of local needs housing within the glossary would further support the consistent application of this policy (**MAC315**), as would related changes to the policy's reasoned justification (**MAC180**).

6.30. As submitted, policy H 5 was titled 'Rural exception sites' and included separate criteria for assessing non-allocated housing sites in the countryside. The conflation of two distinct types of housing proposal within one policy was confusing and the policy title was misleading. **MAC179** would rename policy H 5 'Local needs housing exception sites', and **MAC181** would incorporate the criteria for assessing proposals in rural areas in a new policy entitled '100% affordable housing exception sites'. This change would also adjust the criteria in the new policy to refer to sites adjacent to all settlements, rather than only those with designated settlement boundaries, consistent with national policy.

6.31. **MAC11** and **MAC12** would amend section 1.3 of the Plan to clarify the role of local needs allocations and exception sites within the overall growth strategy. Subject to these and the other amendments identified above, we are satisfied that the policies relating to local needs housing and exception sites broadly align with PPW edition 10 and are justified by evidence.

6.32. The viability assessments have been thoroughly tested through the examination and have been updated to determine realistic affordable housing targets, having regard to the cost of potential obligations and other financial variables, as is required by PPW<sup>90</sup>. Subject to the recommended changes set out in the appendices, we are satisfied that the evidence supports the SHPZ and on-site affordable housing targets and thresholds, and that the approach to negotiating off-site contributions is sound. The six allocations for local needs market housing and affordable housing represent a justified response to the challenges and particular circumstances present within the west of the County. Subject to the changes identified above, we conclude that the Plan's policies relating to affordable housing, local needs housing and exception sites are sound.

### Conclusion

6.32. The viability assessments have been thoroughly tested through the examination and have been updated to determine realistic affordable housing targets, having regard to the cost of potential obligations and other financial variables, as is required by PPW<sup>90</sup>. Subject to the recommended changes set out in the appendices, we are satisfied that the evidence supports the SHPZ and on-site affordable housing targets and thresholds, and that the approach to negotiating off-site contributions is sound. The six allocations for local needs market housing and affordable housing represent a justified response to the challenges and particular circumstances present within the west of the County. Subject to the changes identified above, we conclude that the Plan's policies relating to affordable housing, local needs housing and exception sites are sound.

**87 Local Housing Market Assessment 2013 [EB003]**

**88 Statement of Swansea Council arising from Hearing Session 4 [ED032]**

**89 PPW edition 10 paragraph 4.2.9**

**90 PPW edition 10 paragraph 4.2.28**