



Llywodraeth Cymru
Welsh Government

**COUNTY OF PEMBROKESHIRE
Including
PEMBROKESHIRE COAST NATIONAL PARK**

**JOINT HOUSING LAND AVAILABILITY STUDY
CO-ORDINATED BY THE DEPARTMENT OF THE ECONOMY
AND TRANSPORT (DE&T) OF THE WELSH ASSEMBLY
GOVERNMENT**

**01ST APRIL 2010
IN CO-OPERATION WITH THE STUDY GROUP:**

**PEMBROKESHIRE COUNTY COUNCIL
PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY
LOCAL HOUSING ASSOCIATIONS
ENVIRONMENT AGENCY
WELSH WATER
HOME BUILDERS FEDERATION**

June 2011

(This study is prepared by the Joint Housing Land Availability Study Group)

JOINT LAND AVAILABILITY STUDY

PEMBROKESHIRE COUNTY INCLUDING PEMBROKESHIRE COAST NATIONAL PARK – 01ST APRIL 2010

ANNUAL REPORT CO-ORDINATED BY THE DEPARTMENT FOR THE ECONOMY AND TRANSPORT OF THE WELSH ASSEMBLY GOVERNMENT

1.0 INTRODUCTION

- 1.1 This is the latest report published under Planning Policy Wales (PPW), 2011 for the County of Pembrokeshire, including the Pembrokeshire Coast National Park Authority area. It replaces the last published report for a base date of 1st April 2009.
- 1.2 The current report presents the findings for the area at a base date of 1st April 2010. The report has been prepared by the Study Group in accordance with advice contained in Planning Policy Wales (2011) and the revised Technical Advice Note (TAN) 1: Joint Housing Land Availability Studies (2006). All future Housing Land Availability Studies carried out in Wales will now be undertaken annually with an April 1st base date each year.
- 1.3 Prior to the 1st of April 2006 the Study Group was co-ordinated by the Land Division of the Welsh Development Agency. Since that date the responsibility has transferred to the Department for the Economy and Transport of the Welsh Assembly Government. The Study Group includes the Unitary Authority, housebuilders representatives, housing associations, statutory undertakings and other bodies as appropriate.
- 1.4 The study involves discussions of individual residential land allocations and planning permissions undertaken on an area by area basis and includes consideration of the likely rate of progress in building on each site and an examination, where appropriate, of the problems inhibiting the provision of an adequate land supply.
- 1.5 The report which follows presents the agreed view of the Group involved in its preparation, and the comments comprising Part 3 of the report have been generally agreed by all participants. However any point of difference which have not been resolved through joint discussion are recorded as such and included within part 3.
- 1.6 A copy of the relevant section of Planning Policy Wales (PPW) together with TAN 1(2006), are appended at Annex 4.

2. PART 1: THE SURVEY

- 2.1 Requirements of Planning Policy Wales (2011)

- 2.2 Paragraph 9.2.3 of Planning Policy Wales (2011) states that local planning authorities must ensure that sufficient land is genuinely available or will become available to provide a 5-year supply of housing.
- 2.3 To be genuinely available, sites must satisfy various minimum criteria set out in TAN 1(2006).
- 2.4 As set out in TAN 1(2006), para 7.1.1 for sites to be included in the Joint Housing Land Availability Studies they must satisfy at least one of the following conditions :
- The grant of outline or full planning permission for residential purposes; or
 - The land should be identified for residential purposes in an adopted development Plan.
- 2.5 To allow the comparison of land available with the housing provision in the adopted development plan the sites are categorised as to their availability. The categorisation establishes when the development of a site or a portion of a site is likely to be completed. The allocation of a site to several categories indicates the rate at which development is expected to proceed.
- 2.6 The definitions of the categories adopted by TAN 1(2006) are as follows :
- Sites under construction:** Sites or the phases of sites, which are under construction (relating only to the area where building is in progress);
- Category 1:** Site or the phases of sites where development can commence immediately, and which are likely to be completed within the first year of the study period;
- Category 2:** Sites or the phases of sites where development cannot commence immediately, but where the constraint on development is likely to be removed in time for dwellings to be completed within 5 years;
- Category 2*:** Sites which are capable of being developed within the 5 year period but which lie within the areas defined in paragraph 7.2.1 of TAN 1(2006), where market demand is such that development is unlikely to occur within 5 years.
- Category 3:** Sites or the phases of sites where either:
- 3(i) development is unlikely within 5 years by virtue of major physical constraints or other constraints as may be agreed by the Group; or
- 3(ii) development is unlikely to occur in the foreseeable future by virtue of major long term constraints.
- 2.7 The factors normally taken into account by the Group in assessing whether all or part of a site should be listed in Category 3(i) include planning, ownership, marketing, infrastructure, environmental and legal constraints as well as physical constraints.

2.8 Finally, TAN 1(2006) specifies that for sites or the phases of sites to be regarded as 'genuinely available' within a 5 year period (i.e. sites under construction, Categories 1, 2 and 2*) the following criteria should apply:

- the necessary infrastructure should be available or be expected to be available within the 5 year period. Consultation with appropriate public and private statutory undertakers and infrastructure providers may be appropriate ;
- the Group agree that it is financially viable to develop the site

In addition, for Category 1 and 2 sites there should be a reasonable prospect of the site being sold for development where the land is not already owned by developers or a public body with its own firm plans for building. This should be based on a realistic assessment irrespective of current market conditions.

Method

2.9 The Group has met to consider all sites of 5 or more units, which satisfy the minimum criteria for being included in the study, to estimate the number of completions likely within the 5 year period, and to agree categorisation. Copies of the schedules listing the individual sites considered by the Group are published as part of the Main Report. The findings are set out in Table 1, which follows.

2.10 Small sites, accommodating less than 5 units, which by definition, have not been assessed individually in this Study, may make an important contribution to meeting housing needs. In recognition of this, as in previous studies, assessments of the likely completions on small sites appear as a footnote to Table 1 and have been taken into account in the UDP comparison exercise in Part 2 of the report.

2.11 Sites subject to Section 106 Agreements are now only to be included in the studies if they are allocated in an adopted development plan.

2.13 Additional requirements of TAN 1(2006)

2.14 A number of new data requirements set out in the new TAN 1(2006) guidance are incorporated into the 2007 round of studies. These include seeking to establish the level of completions in terms of :

- market and affordable housing units;
- brownfield and greenfield land ;
- by house type ;
- sites affected by flood risk.

2.15 The Group has also been asked to consider how the future land supply position is likely to provide for future affordable housing provision, development on previously developed land and what anticipated level of provision is likely to come forward from sites subject to flood risk.

2.16 It is recognized that not all these factors will have a particular significance in each authority area but where such matters are considered to be relevant then a commentary or tabulation of results may be appropriate for inclusion in the study report.

- 2.17 The Joint Unitary Development Plan (2000-16), prepared jointly by the Council and National Park Authority, was adopted in July 2006 and provides the context for this study. It should be noted that Pembrokeshire County Council and Pembrokeshire National Park Authority are preparing separate Local Development Plans. Options for preparation of future studies include a combined report setting out a County wide overview, but with discrete assessments of housing supply for each authority's area and separate reports (with or without a shared timetable). It will be for the two local planning authorities in discussion with Welsh Assembly Government to agree a preferred approach.

TABLE 1
Pembrokeshire County & Pembrokeshire Coast National Park

**LAND AVAILABLE FOR
HOUSING (EXCLUDING s106 SITES)
AS AT 1 APRIL 2010
SITES CAPABLE OF ACCOMMODATING 5 OR MORE UNITS**

PEMBROKESHIRE COUNTY AND PEMBROKESHIRE COAST NATIONAL PARK

	PROPOSED UNITS	AREA (HA)	CATEGORISATION					UNITS COMPLETE 1/4/09 31/3/10	
			U/C	1	2	2*	3(i)		3(ii)
PRIVATE SECTOR	6968	309.83	218	51	1093	0	5606	0	122
HA PRIVATE	0	0	0	0	0	0	0	0	0
PUBLIC SECTOR	0	0	0	0	0	0	0	0	0
HA PUBLIC	103	5.89	31	0	55	0	17	0	78
TOTAL	7071	315.72	249	51	1148	0	5623	0	200

TOTAL DWELLINGS AVAILABLE:	PRIVATE SECTOR	1362
	HA – PRIVATE	0
	PUBLIC SECTOR	0
	HA – PUBLIC	86
	TOTAL <i>(uc+c1+C1+2*)</i>	1448
	* Forecast contribution by small sites	1272
	Large and Small Site 5 year total	2721

Small Site Completions 2005-2010 (See Annex 3a for small site figures)

PEMBROKESHIRE COUNTY		PEMBROKESHIRE NATIONAL PARK	
YEAR	COMPLETIONS	YEAR	COMPLETIONS
2006	303	2006	25
2007**	74	2007**	29
2008	343	2008	38
2009	227	2009	30
2010	121	2010	19
*Total 5 Year Forecast	1068		141
1209/4.75=254 X5 = 1272			

* 5 year forecast contribution by small sites = 254 p.a = 1272

** Note small sites completions for the 9 month period from 01st July 2006-31st March 2007

**TABLE 2
Pembrokeshire Coast National Park**

**LAND AVAILABLE FOR HOUSING (EXCLUDING s106 SITES)
AS AT 1 APRIL 2010
SITES CAPABLE OF ACCOMMODATING 5 OR MORE UNITS
PEMBROKESHIRE COAST NATIONAL PARK**

	PROPOSED UNITS	AREA (HA)	CATEGORISATION						UNITS COMPLETE 1/4/09 31/3/10
			U/C	1	2	2*	3(i)	3(ii)	
PRIVATE SECTOR	362	20.76	8	1	111	0	242	0	4
HA PRIVATE	0	0	0	0	0	0	0	0	0
PUBLIC SECTOR	0	0	0	0	0	0	0	0	0
HA PUBLIC	0	0	0	0	0	0	0	0	0
TOTAL	362	20.89	8	1	111	0	242	0	10

TOTAL DWELLINGS AVAILABLE:	PRIVATE SECTOR	120
	HA – PRIVATE	0
	PUBLIC SECTOR	0
	HA – PUBLIC	0
	TOTAL	120
	* Forecast contribution by small sites	148
	Large and Small Site 5 year total	268

Small Site Completions 2005-2010 (See Annex 3a for small site figures)

PEMBROKESHIRE NATIONAL PARK	
YEAR	COMPLETIONS
2006	25
2007**	29
2008	38
2009	30
2010	19
141/4.75=30 X5 = 148	

* 5 year forecast contribution by small sites = 30 p.a = 148 units

** Note small sites completions for the 9 month period from 01st July 2006-31st March 2007

TABLE 2
Pembrokeshire County

LAND AVAILABLE FOR HOUSING (EXCLUDING s106 SITES)
AS AT 1 APRIL 2010
SITES CAPABLE OF ACCOMMODATING 5 OR MORE UNITS
PEMBROKESHIRE COUNTY

	PROPOSED UNITS	AREA (HA)	CATEGORISATION					UNITS COMPLETE	
			U/C	1	2	2*	3(i)	3(ii)	1/4/09
PRIVATE SECTOR	6606	289.07	210	50	982	0	5364	0	118
HA PRIVATE	0	0	0	0	0	0	0	0	0
PUBLIC SECTOR	0	0	0	0	0	0	0	0	0
HA PUBLIC	103	5.76	31	0	55	0	17	0	72
TOTAL	6709	294.83	241	50	1037	0	5381	0	190

TOTAL DWELLINGS AVAILABLE:	PRIVATE SECTOR	1242
	HA – PRIVATE	0
	PUBLIC SECTOR	0
	HA – PUBLIC	86
	TOTAL	1328
	* Forecast contribution by small sites	1124
	Large and Small Site 5 year total	2452

Small Site Completions 2005-2010 (See Annex 3a for small site figures)

PEMBROKESHIRE COUNTY	
YEAR	COMPLETIONS
2006	303
2007**	74
2008**	343
2009	227
2010	121
1068/4.75 = 225 X5 = 1124	

* 5 year forecast contribution by small sites = 1124 (225pa)

** Note small sites completions for the 9 month period from 01st July 2006 - 31st March 2007

3.0 Findings

3.1 The five year supply in the County of Pembrokeshire and the Pembrokeshire Coast National Park area as at 01st April 2010 was 2731 dwellings on large sites. There were 200 dwellings completed over the last year on sites over five units. Small site contribute significantly to the total overall completions. There were 121 small site completions in the Pembrokeshire Unitary Authority area and a further 19 in Pembrokeshire Coast National Park.

3.2 A total of 249 units were under construction at 01st April 2010.

3.3 Category 3(i) contains 5623 units, there are no units in category 3(ii).

4. **PART 2 - CALCULATION OF 5 YEAR LAND SUPPLY**

4.1 **Basis for Comparison**

(NB The completions calculation for this study is for the 12 month period from 1st April 2009 to the 1st of April 2010)

4.1.2 The land supply position has been assessed against both the policy provisions of the adopted Unitary Development Plan and the results are summarized in Table A.

4.2 **Results of Comparison**

4.2.1 The results of the 2010 study show that the Joint Authority area as a whole has a 4.5 year land supply.

TABLE A

**AVAILABILITY OF LAND FOR PUBLIC AND PRIVATE HOUSEBUILDING
IN COUNTY OF PEMBROKESHIRE AND PEMBROKESHIRE COAST NATIONAL PARK AT 1ST APRIL 2010
BASED ON THE JOINT UNITARY DEVELOPMENT PLAN 2000-2016**

AREA/ ZONE	JOINT UDP PROVISION 2000-2016 a	COMPLETIONS 30/06/2000- 31/03/2010 (9.75Years) b	REMAINDER 01/04/2010- 01/04/2016 (6 years) c=a-b	5 YEAR REQUIREMENT 2010-2015 d D=C/6X5	TOTAL ANNUAL BUILDING REQUIREMENT e=d/5	TOTAL LAND AVAILABLE f	TOTAL LAND SUPPLY IN YEARS g=f/e
PEMBROKESHIRE & NATIONAL PARK	9000	5406	3594	2995	599	2721	4.5 years

Note:

(b) Includes 2010 small site completions = 140

(f) Includes projected contribution of small sites based on last five years completions average for 2010-2015 = 1272 units (See Table 1 & Annex 3)

5. **PART 3 - COMMENTARY**

5.1 **Completions**

- 5.1.2 As previously noted by the Home Builders Federation (HBF) the housing market in Pembrokeshire is characterised like most of West Wales by a higher proportion of construction on small sites than in Industrial South Wales, this is reflected in the fact that approximately 43% of annual dwelling completions, using the latest figures, are on sites of under 5 units. This increased level of contribution by small sites to the overall land supply position needs to be carefully monitored in determining future provision.
- 5.1.3 The level of market demand is lower than in the larger urban areas further east where most of the volume builders focus their activity. The slower rate of sales makes the market more readily suited to small/medium sized builders with a local labour force. A significant downturn in economic conditions has taken place over the past two years and this is evidenced in this years study by the fall in recorded house completions.
- 5.1.4 The particular circumstances within the National Park, where a policy of restraint applies, are discussed later in the report.
- 5.1.5 Table B below indications information on completions in the County of Pembrokeshire and Pembrokeshire Coast National Park in the plan period.

TABLE B

HOUSING COMPLETIONS SINCE THE COMMENCEMENT OF THE JUDP PLAN PERIOD

COUNTY OF PEMBROKESHIRE AND PEMBROKESHIRE COAST NATIONAL PARK COMPLETION FIGURES FOR 1st JULY 2000 – 31st MARCH 2010 (9.75 YEARS)

JUDP	COMPLETIONS 01/07/00– 31/03/10 (9.75 years)	ANNUAL AVERAGE
Joint PCC/PCNPAuthority Area	5406	555

- 5.1.6 Table B indicates that the rate of completions over the years since the commencement of the UDP period is running at an average of 555 dwelling completions per annum.

5.2 **Land Supply Compared to Past Building Rates**

- 5.2.1 Table C sets out the comparison between the current land supply and past building rates. Using the average for the past 5.75 years, the land currently agreed to be available would last for a further 5.3 years. Though a comparison with the level of completions over the UDP period revealed a five year supply across the County.

TABLE D

YEARS SUPPLY OF HOUSING LAND BASED ON PAST BUILDING RATES

	Total Approved Land Available by 01/04/2015	01/07/2000 – 31/03/2010 (9.75 Years)		2004/2005 – 31/03/2010 (5.75 Years)	
		Average Annual Completions	Years Supply of Land	Average Annual Completions	Years Supply of Land
Pembrokeshire	2721	555	4.9	515	5.3

5.3 Completions by House Type (Dwellings over 5 units only)

5.3.1 The study has also identified completions by dwelling type and this is indicated in Figure 3 and Figure 3a below.

FIGURE 3: Pembrokeshire County Large Site (over 5 units) Completions by House Type April 2009/2010

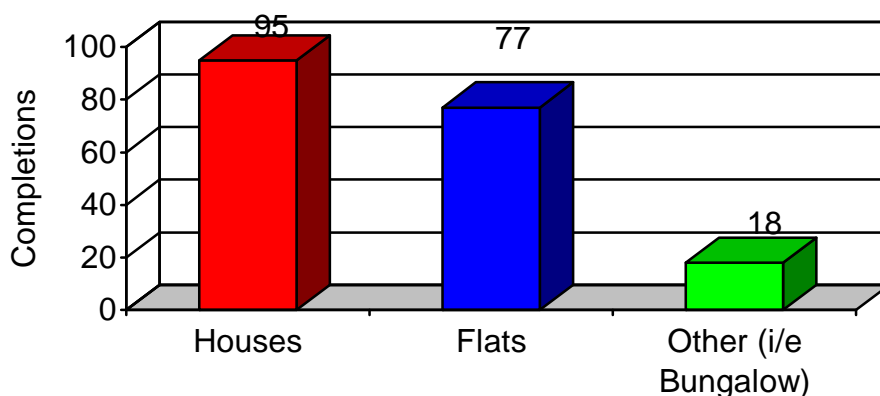
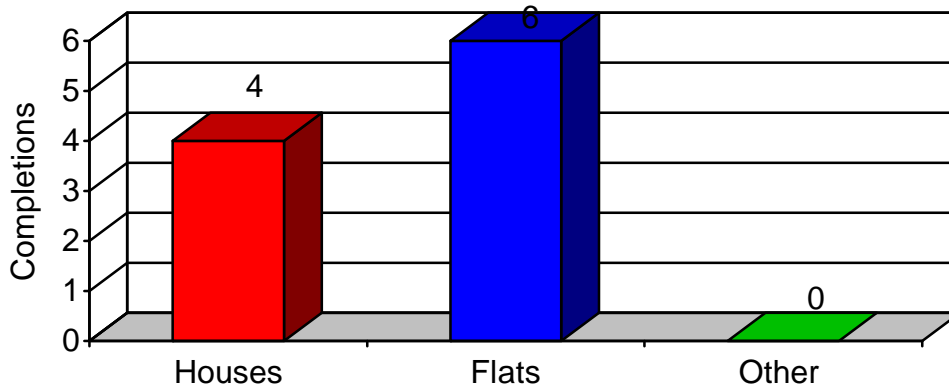


FIGURE 3a: Pembrokeshire Coast National Park Large Site (over 5 units) Completions by House Type April 2009/2010



5.4 **Small Sites**

5.4.1 It is important to note the contribution to the land supply provided by small sites, i.e. sites for fewer than five dwellings, which are not individually identified during the Study but which are particularly important in most parts of the Pembrokeshire area. The small sites allowance contributing to land supply in the 2009 Study are based upon previous recorded/estimated completions in the County and the National Park, in accordance with the requirements set down in TAN 1.

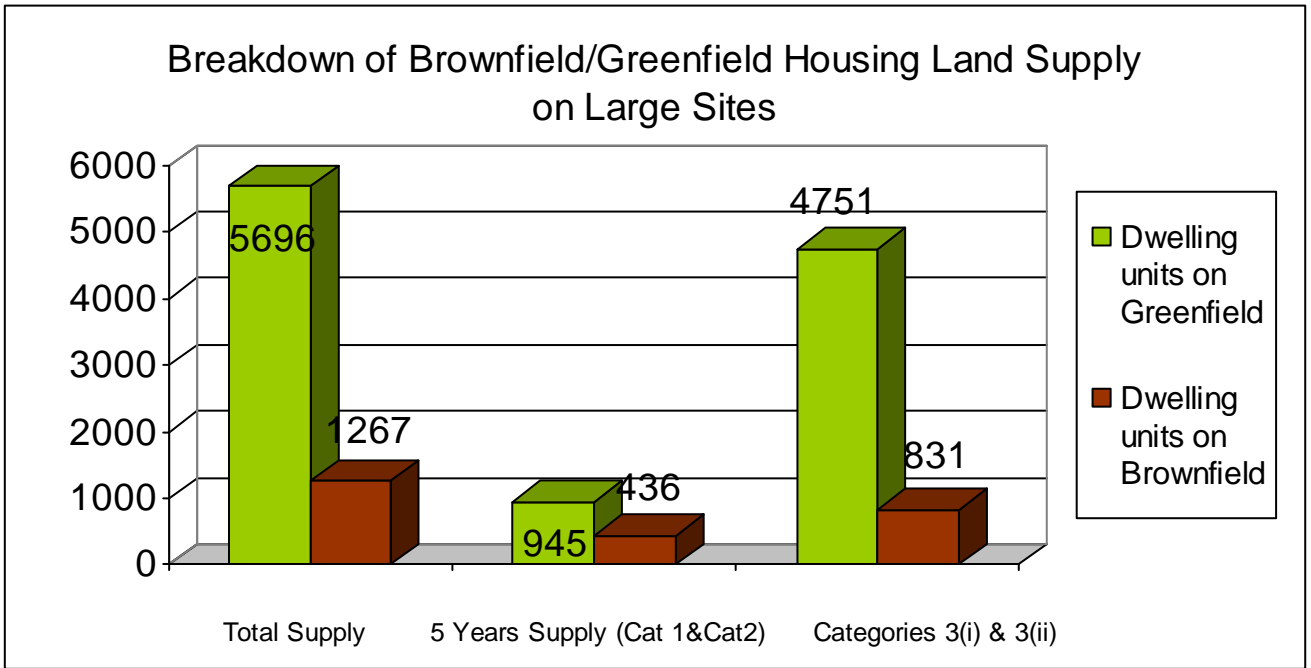
5.4.2 Table 1 shows that 48% of the overall land supply in Pembrokeshire/Pembs Coast National Park area is anticipated to be accommodated on small sites. Previous studies have recorded a contribution level of around 30% by small sites which generally suggested around a third of dwellings would come from sites of less than five units in size. The contribution made by conversion of existing buildings is accounted for in these assessments. The increased contribution by small sites in the past two years may be a reflection of the economic impact on the development of larger sites in the area.

5.4.3 The scale of contribution by small sites and the rise identified in the last two years makes an accurate assessment of their contribution a pre-requisite for effectively monitoring the land supply situation across the County.

6.0 **Current Economic Climate**

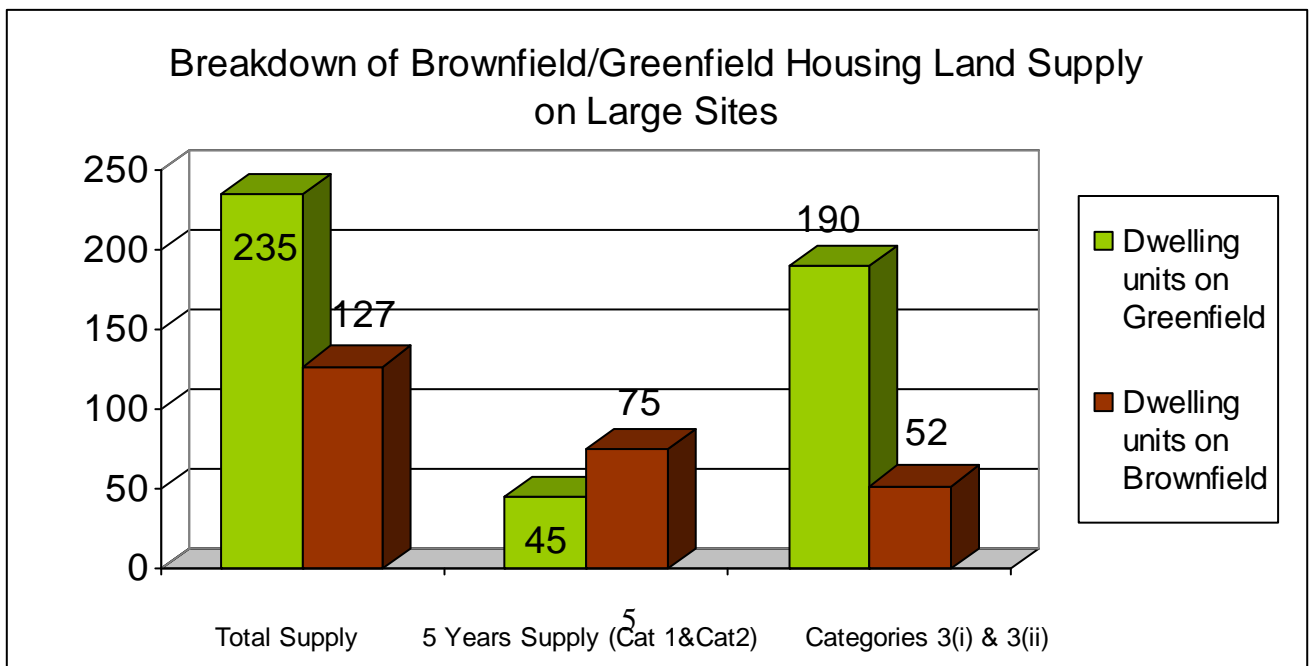
- 6.1 The impact on the housebuilding industry due to the economic circumstances prevailing over the past 18 months or so has been apparent in the last two studies. It was noted that predicting the timescale over which the current adverse economic climate would continue was difficult but for the purposes of the study it was agreed that the Group would examine each site on its merits in light of the information available.
- 6.2 In terms of the provision of affordable housing and the likely future contribution the Group agreed that it was likely to be more difficult to provide through the S106 delivery mechanism as this was generally allied to private market housebuilding and the prevailing market conditions evidenced the difficulty in obtaining finance for both developers and purchasers.
- 6.3 It was also noted the difficulty the National Park Authority were having in terms of shared equity schemes (i.e Intermediate affordable housing) as the potential occupiers were unable to raise the relevant share via mortgage funding in terms of Homebuy schemes.
- 7.0 **Previously developed Land (or Brownfield) contribution to the Land Supply**
- 7.1 While Government guidance promotes a range of and choice of sites for housing development, the guidance also advocates emphasis on the development of brownfield (i.e previously developed) sites. It is, however acknowledged that brownfield sites often suffer from physical or ownership constraints which can make their development more problematic.
- 7.2 To assist in informing and monitoring the brownfield sites situation as in the previous study, Figure 4 and 4a below shows a disaggregation of the five year and total land supplies on large sites in Pembrokeshire County and the National Park into greenfield and brownfield elements.

Figure 4b: Pembrokeshire County Breakdown of Brownfield/Greenfield Housing Land Supply on Large Sites (over 5 dwellings)



Category 1	Sites or phases of sites where development can occur immediately and will be completed within 5 years.
Category 2.	Sites or phases where development can't commence immediately but is likely to be completed within 5 years
Category 3i	Development unlikely within 5 years due to major physical constraints
Category 3ii.	Development unlikely to occur in the foreseeable future due to major long term constraints

Figure 4c: Pembrokeshire Coast National Park Breakdown of Brownfield/Greenfield Housing Land Supply on Large Sites (over 5 dwellings)



7.3 Of the dwellings available within the five year period on large sites, the percentage contribution from brownfield land in Pembrokeshire County is 32% and 63% in the National Park as illustrated further in Figure 5 and 5a which follows

7.4 Figure 4, above demonstrates that overall approximately 18% of the Pembrokeshire County's total land supply comprises brownfield land and 35% within Pembrokeshire Coast National Park.

Figure 5: Pembrokeshire County Percentage of Brownfield Land 2010-2015 (Large sites)

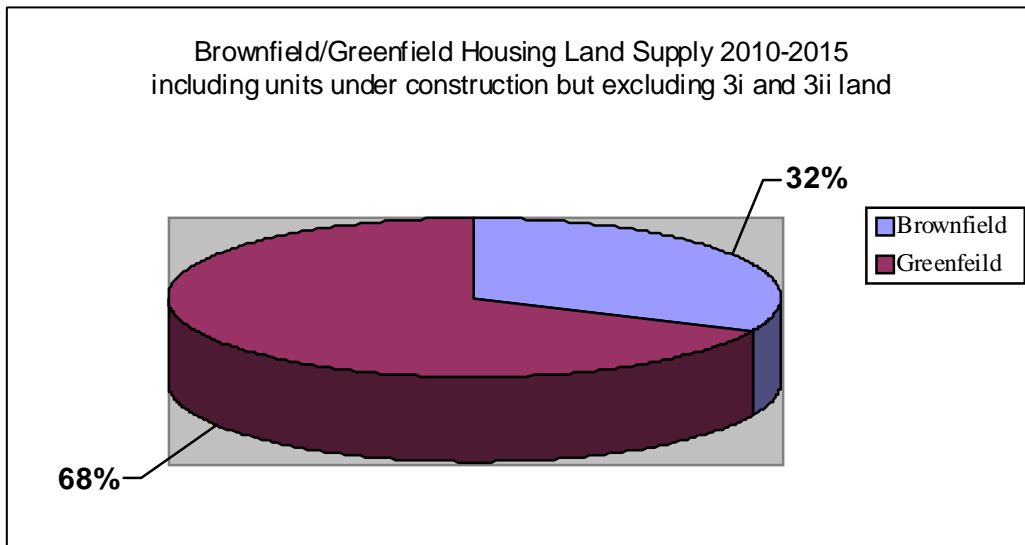


Figure 5a: Pembrokeshire Coast National Park Percentage of Brownfield Land 2010-2015 (large sites)



7.5 Figures 6 and 6a similarly indicate actual dwelling completions on sites of 5 or more units over the 12 month study period split between greenfield and brownfield; it can be seen

that 26 % have occurred on brownfield sites in Pembrokeshire County and 0% within Pembrokeshire Coast National Park.

Figure 6 – Pembrokeshire County Large Site Completions (over five dwellings) on Greenfield / Brownfield Land

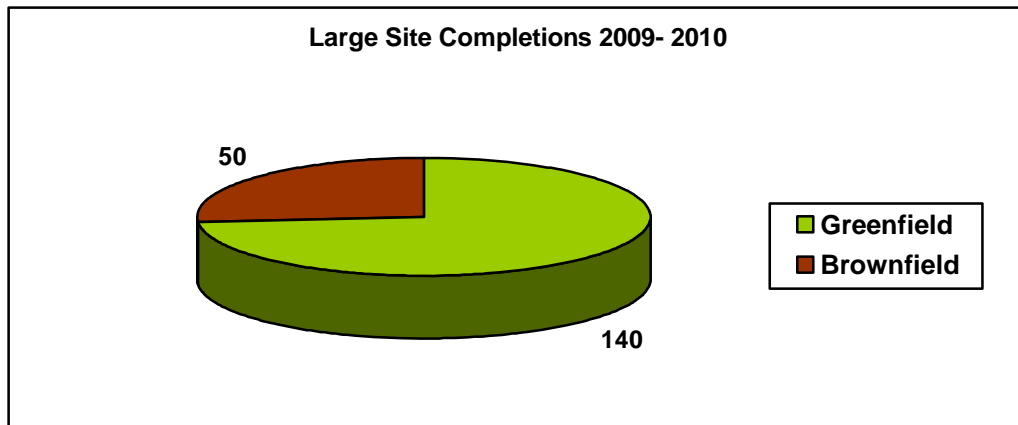
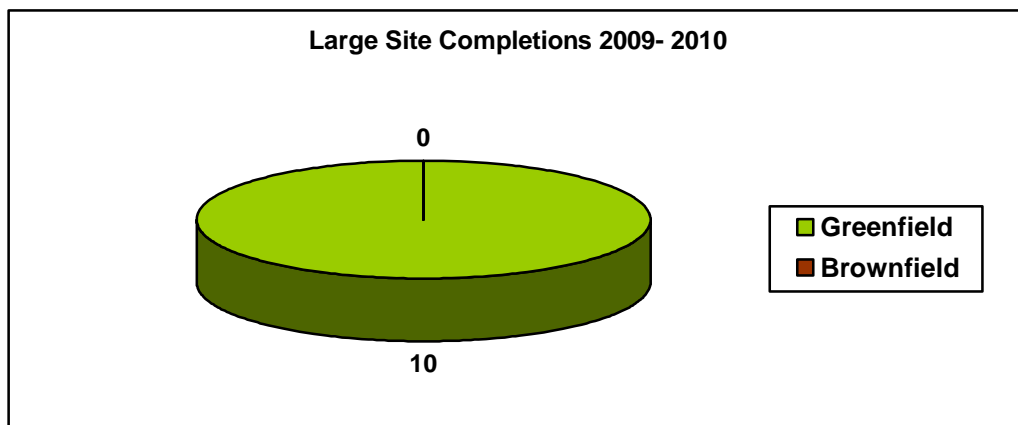


Figure 6a – Pembrokeshire Coast National Park Large Site Completions (over five dwellings) on Greenfield / Brownfield Land



7.6 The Brownfield/Greenfield contribution will continue to be monitored in future studies.

8.0 Sites Subject to Flood Risk

8.1 To assist in informing and monitoring the sites subject to flood risk, the study incorporates, in Figure 9 and 9a below, a disaggregation of the total supply and total land supplies on large sites in the County into flood risk elements.

8.2 Description of Zones are defined in TAN 15 and used within the precautionary framework.

C1: Areas of floodplain which are developed and served by significant infrastructure, including flood defences. Used to indicate that development can take place subject to application of justification test, including acceptability of consequences.

C2: Areas of floodplain without significant flood defence infrastructure. Used to indicate that only less vulnerable development should be considered subject to application of justification test, including acceptability of consequences.

Figure 9: Pembrokeshire County Sites Subject to Flood Risk within the Total Supply (Includes units within Category 3(i) and 3(ii)).

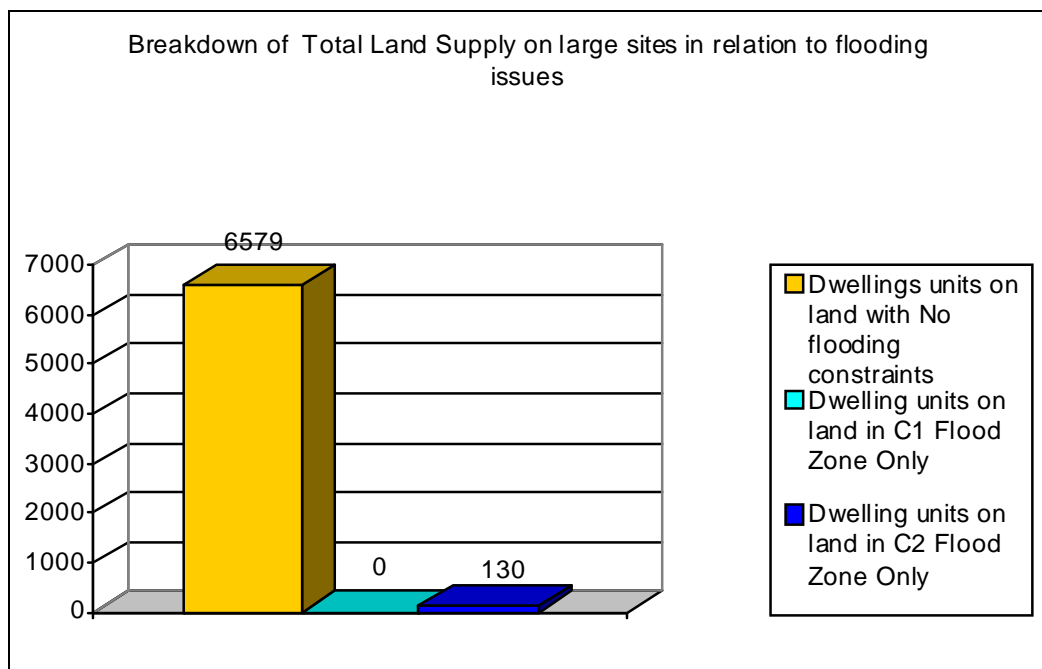


Figure 9a: Pembrokeshire Coast National Park Sites Subject to Flood Risk within the Total Supply (Includes units within Category 3(i) and 3(ii)).

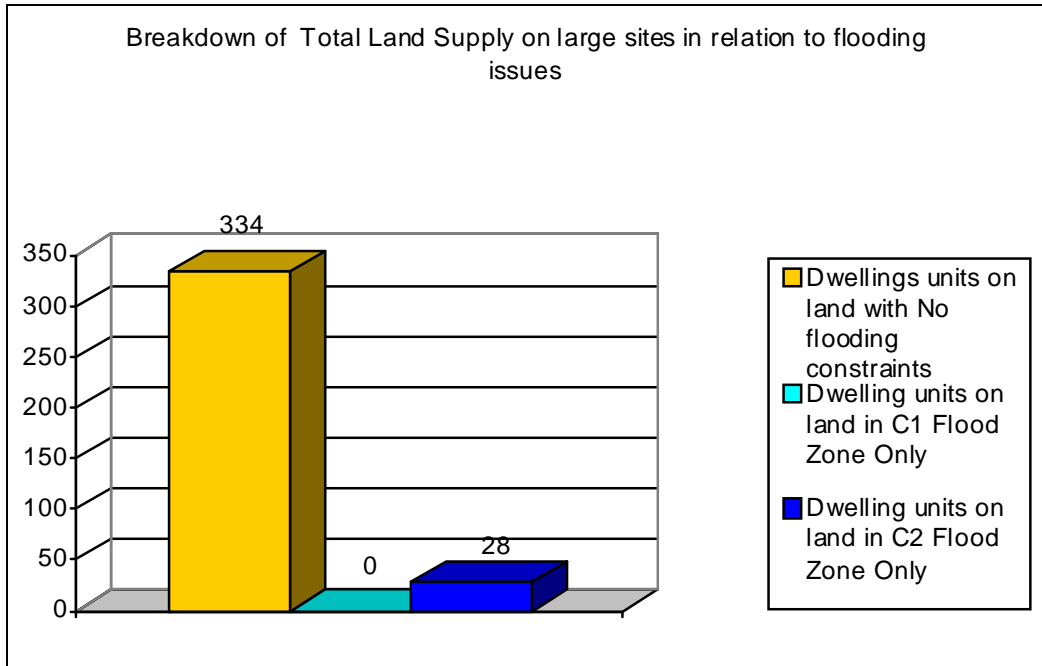


Figure 10 : Pembrokeshire County total land supply in relation to flooding issues

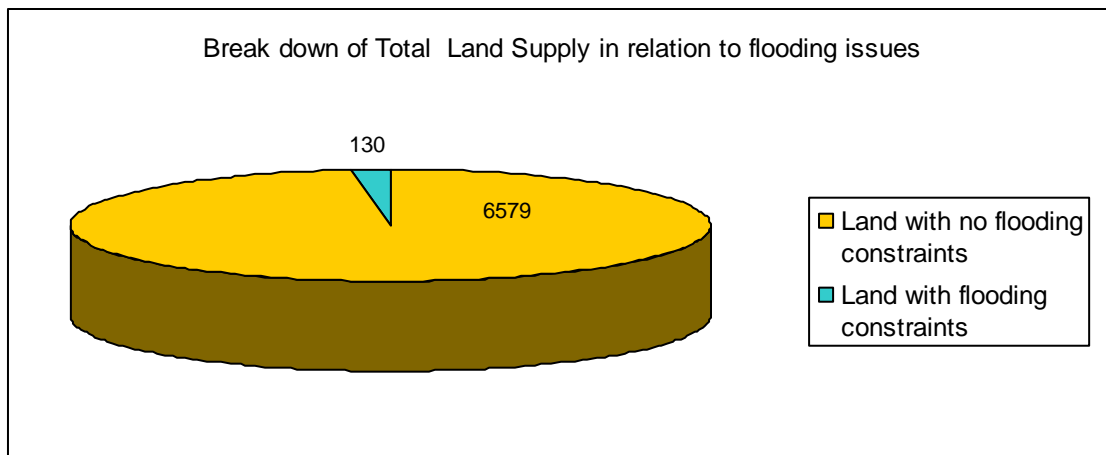
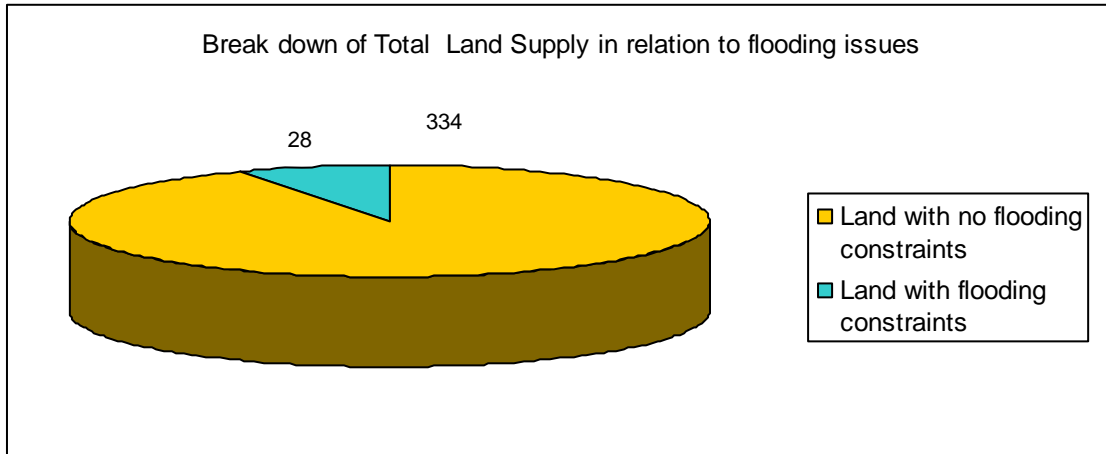


Figure 10a : Pembrokeshire Coast National Park total land supply in relation to flooding issues



8.3 Figures 11 and 11a, and 12 and 12A illustrate that 30 of the dwelling units within the five year supply are on land within a C1 or C2 flood zone i.e. subject to flood risk.

Figure 11: Pembrokeshire County breakdown of 5 year land supply 2010-2015 in relation to flooding issues

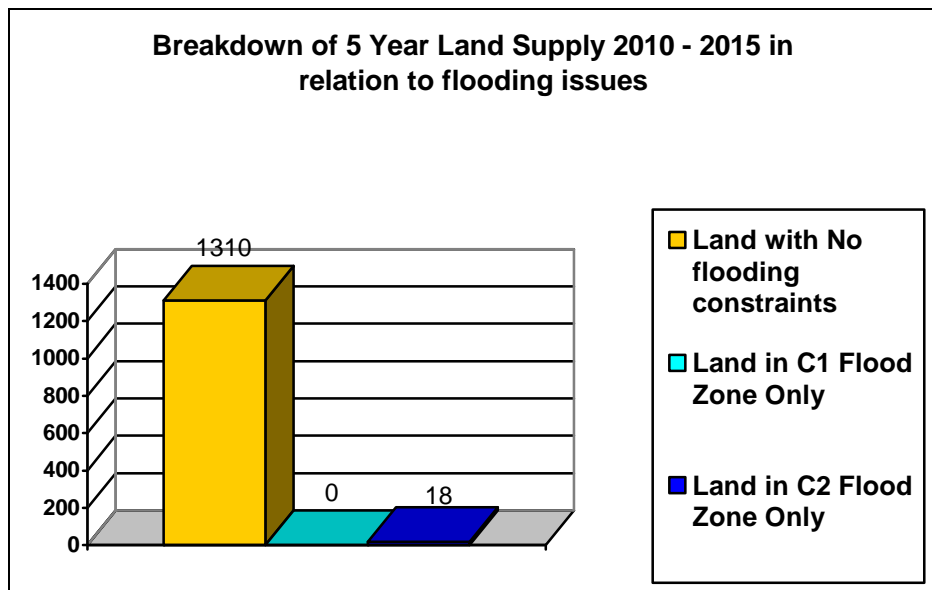


Figure 11a: Pembrokeshire Coast National Park breakdown of 5 year land supply 2010-2015 in relation to flooding issues

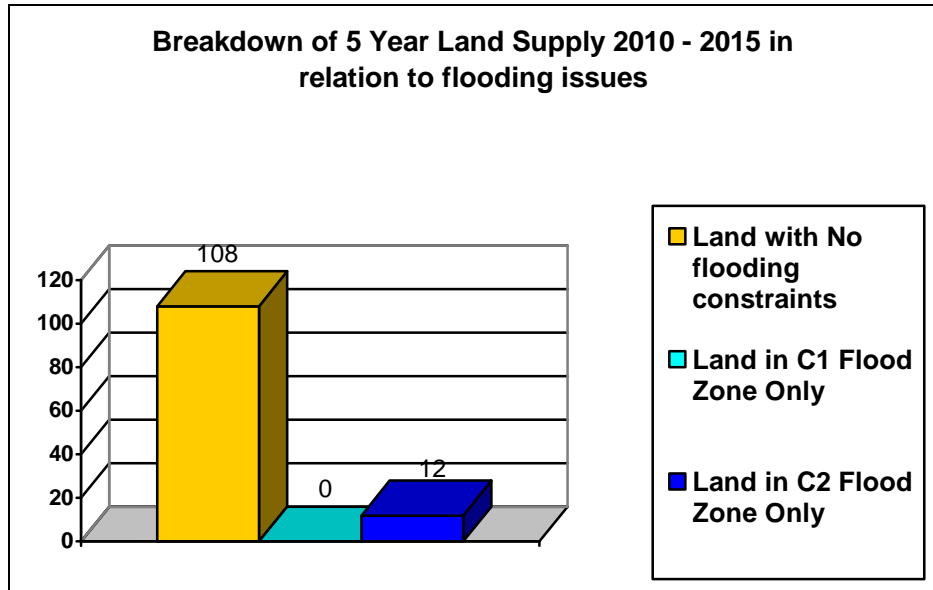


Figure 12: Pembrokeshire County

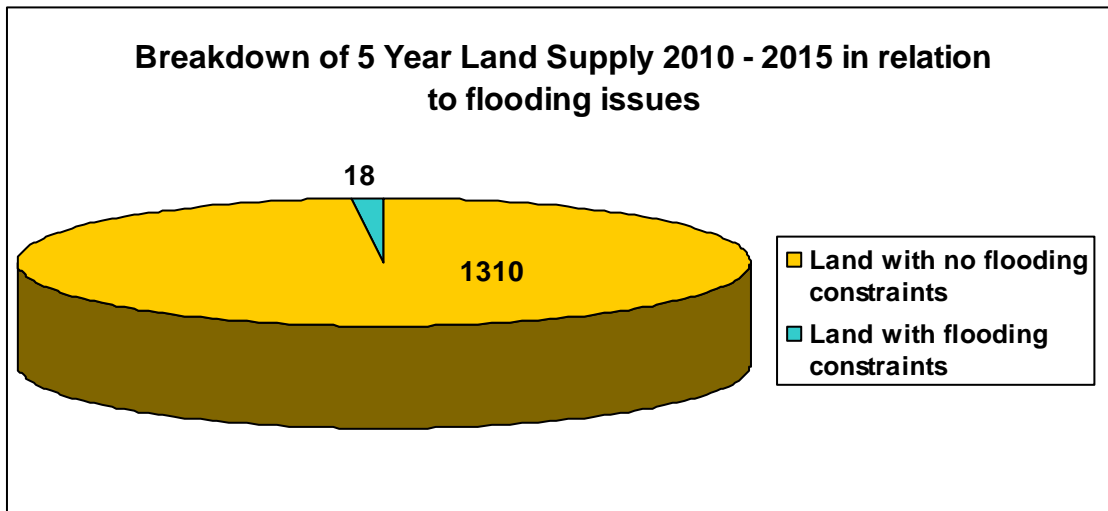
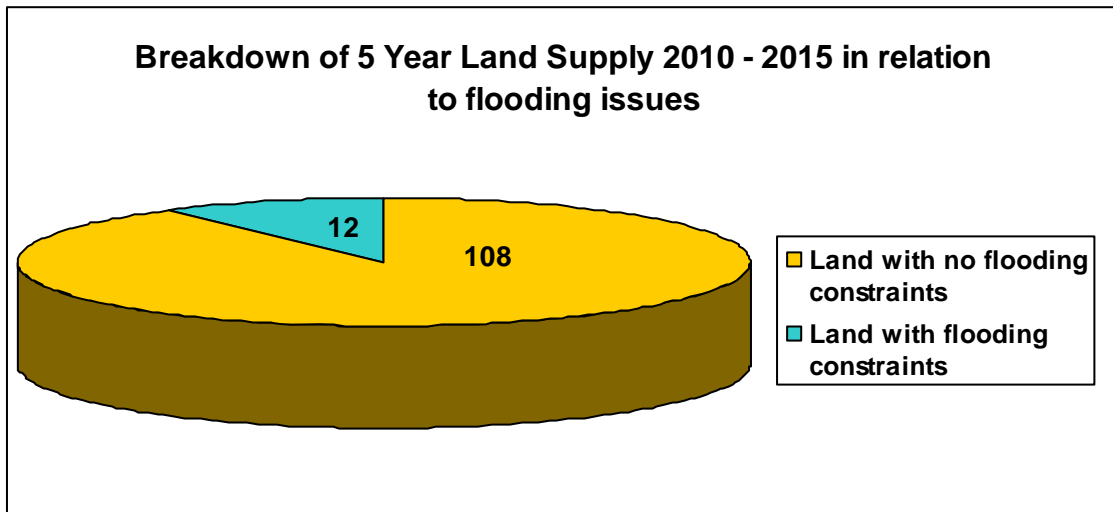


Figure 12a: Pembrokeshire Coast National Park



8.4 Figure 13 and 13a show that no completions have taken place within the C1/C2 flood plain in the period 01st April 2009 – 01st April 2010.

Figure 13: Pembrokeshire County Total large site completions in the flood plain

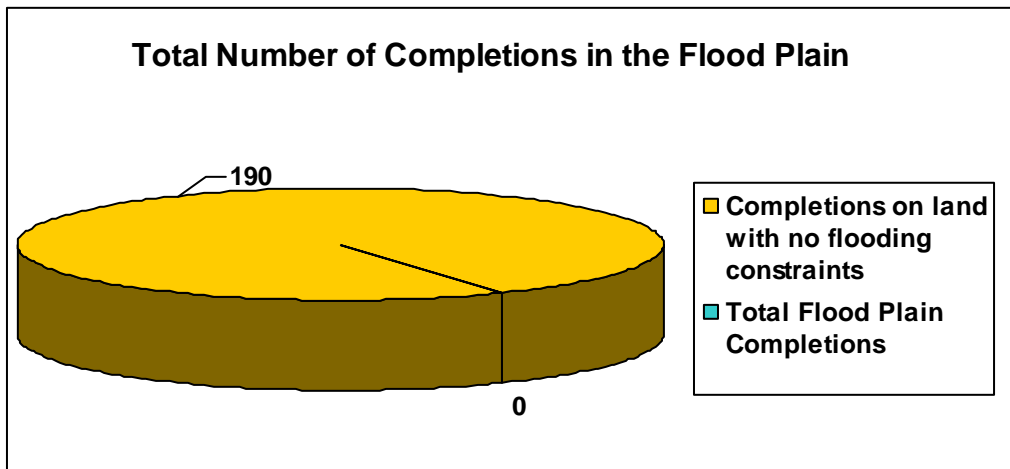
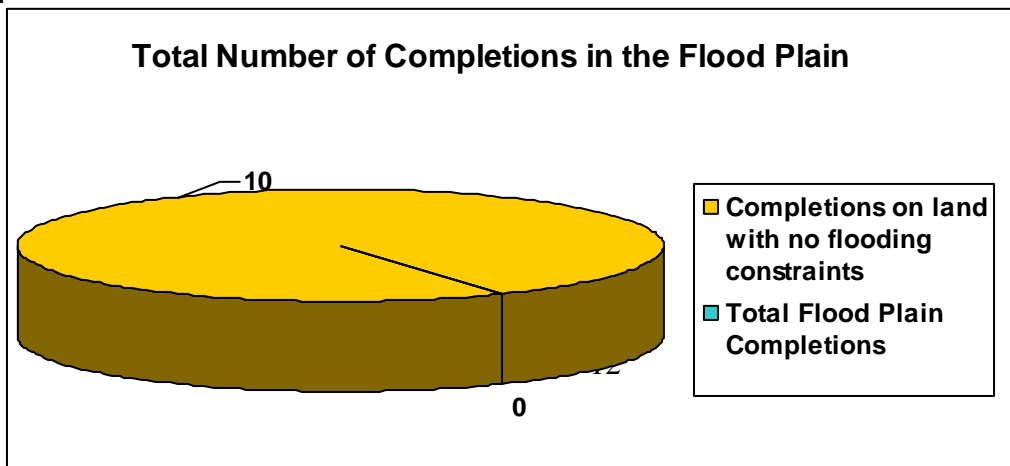


Figure 13a: Pembrokeshire Coast National Park Total large site completions in the flood plain



9.0 CONCLUSION

- 9.1 The current study based on the position at 01st April 2010 shows that the County of Pembrokeshire including Pembrokeshire Coast National Park to have land available to provide a 4.5 year land supply when set against the Joint UDP.
- 9.2.1 As indicated in Tables 1-3, development of sites for fewer than five dwellings remains an important component of the housing supply. Small sites currently contribute 47% of the overall dwelling provision in the Pembrokeshire area. Given this high proportionate contribution, there continues to be a need for this to be closely monitored in future studies.

Pembrokeshire County Council Land Supply Commentary

- 9.2.3 PCC considers that the current economic climate has had a significant impact on development in Pembrokeshire. Many developers are choosing to hold back sites because of this, rather than because of issues of deliverability with sites. This is the main reason for a number of sites transferring from category 2 to inclusion in category 3 (i). There is a significant area of land available for development in Pembrokeshire as a whole. Of the category 3i sites (5381 units) some 1842 have planning consent. This provides a considerable resource which is unconstrained physically and could therefore be brought forward quickly in response to any improvements in the housing market.

The 4.5 year land supply for Pembrokeshire as a whole is not considered a sound representation of the land supply position within PCC planning area. Apportionment of the whole county residual data to PCC planning area reveals a 5.16 or a 5.89 year supply depending on whether population or land area is used as a basis for analysis ^{Footnote 1}. PCC considers that this apportionment, taken together with the whole County analysis, using past building rates and, taken together with the commentary above on the planning status of the 3i sites, is indicative that there is no identified shortfall in the PCC planning area and no need for short term intervention to increase the supply of housing land.

Following The Planning and Compulsory Purchase Act 2004 (Commencement No.4 and Consequential, Transitional and Savings Provisions) (Wales) (Amendment No.3) Order 2006 ^{Footnote 2} PCC no longer has powers to review the JUDP.

At the base date for the study PCC progress on the LDP is well advanced, with the authority working towards the deposit LDP and submission anticipated in early 2012. In the lead in to finalising this publication the LDP completed the Deposit consultation and a number of representations have been received that the plan identifies too much land for housing, others that there is insufficient.

Footnote 1:

*The JHLAS 'JUDP residual' figure of 597 per year is a combined 'whole county' figure. Apportionment of the figure to PCC only, on the basis of 80% (population) or 70% (land area) suggests two optional residual annual requirements:
80% of 597 = 477.6 this delivers a 5.13 year supply
70% of 597 = 417.9 – this delivers a 5.86 year supply.*

Footnote 2

2006 No. 3119 (W.289)

Pembrokeshire Coast National Park Land Supply Commentary

- 9.2.4 The conclusion of a 4.5 year land supply is a consequence of the JHLAS being a forecast of what we believe is likely to be built over the next five years, rather than an assessment of the amount of land that could be developed over the next five years. This leads to a somewhat circular argument in that the land supply is defined as what we currently estimate to be the land that will be developed over the next five years. Unfortunately this is then assessed against what we intended to be the rate of development when the JUDP was being formulated 5 or 6 years ago, showing that we have less than a five year supply. What the JHLAS appears to state is that the target for development in the JUDP won't be met because of a lack of supply, when in fact the figures are the result of our belief that it won't be met because land that is available will not be taken up at a sufficient rate.

In September 2010 the Pembrokeshire Coast National Park Authority adopted a new Local Development Plan which releases land for the provision of approximately 962 new dwellings between its base date in 2007 and end date in 2021 (in addition to 387 units with planning permission at the base date). The release of this land will more than accommodate the apparent shortfall in five year supply identified by this report.

ANNUAL COMPLETIONS IN PEMBROKESHIRE COUNTY
1st July 1997- 31st March 2010 (11.75 years)

COMPLETIONS	1999/2000	2000/01	2001/2	2002/3	2003/4	2004/5
Large sites	790		516		671	
Small sites	238	189	74	193	86	249
2YEAR TOTALS	1217		783		1006	

COMPLETIONS	2005/6	1 st July 2006/31st March 2007*	01 st April 07 – 31 st March 2008	01 st April 08 –31 st March 2009	01 st April 09 – April 2010
Large sites	925		348	171	190
Small sites	303	74	343	227	121
2YEAR TOTALS	1302		691	398	311

ANNUAL COMPLETIONS IN PEMBS COAST NATIONAL PARK
DEC 1995- 31st March 2009 (11.25 years)

COMPLETIONS	1995/6	1996/7	1997/8	1998/9	1999/2000	2000/1	2001/2	2002/3	2003/ 4	2004/5
Large sites	74	33	22	33	41	30	65		65	
Small sites	26	21	36	64	80		32	43	32	35
2YEAR TOTALS	154		155		151		140		132	

COMPLETIONS	2005/6	1 st July 06/31st March 2007*	01 st April 07 – 31 st March 2008	01 st April 08 –31 st March 2009	01 st April 09 – April 2010
Large sites	96		68	49	10
Small sites	25	29	38	30	19
TOTALS	150		106	79	29

DEVELOPMENT PLANS

(A) JOINT UNITARY DEVELOPMENT PLAN for PEMBROKESHIRE 2000-2016 (JUDP)

Deposit JUDP published in May 2002.

Proposed Changes documents published June –August 2003

Public Inquiry commenced January 2004.

The Inspector's report was presented to the Authorities in November 2005.

Proposed Modifications to the plan were issued early in 2006.

The plan was adopted in July 2006.

(B) LOCAL DEVELOPMENT PLANS (LDP's)

ANNEX 3 (a)

PEMBROKESHIRE COAST NATIONAL PARK SMALL SITES CONTRIBUTION TO LAND SUPPLY
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- a) Dwellings Completed on small sites 09-10 19 units
- b) Projected Small sites contribution over the
next 5 years based on past rates of completion 148 units
- c) Table of Completions on Small Sites 87-10

87 to 88	51
88 to 89	55
89 to 90	76
90 to 91	114
91 to 92	60
92 to 93	66
93 to 94	57
94 to 95	34
95 to 96	26
96 to 97	21
97 to 98	36

98 to 99	64
99 to 00	31
00 to 01	64
01 to 02	32)
02 to 03	43)
03 to 04	32)
04 to 05	35)
05 to 06	25
06 to 07*	
(9 months)	29
07 to 08	38
08 to 09	30
09 to 10	19

-----11.75 years

Total completions over last 22.75 year period – 1038 units –average of 46 units pa

Last 11.75 years have seen 442 completions – average of 38 pa

Projection contribution agreed of 148 units over next 5 year period ie 30 pa

Last 4.75 years have seen 141 completions – 30pa

ANNEX 3 (b)

PEMBROKESHIRE COUNTY COUNCIL AREA

SMALL SITES CONTRIBUTION TO LAND SUPPLY

- a) Dwellings Completed on small sites 08-09* 121
- b) Projected Small sites contribution over the next 5 years based on past rates of completion 1124
- c) Table of Completions on Small Sites _01/07/1998 to 31/03/2010

YEAR/LOCATION	PEMBS COUNTY TOTAL
1998-1999	39
1999-2000	238
Start of 11.75 year period	
2000-2001	189
2001-2002	74
2002-2003	193
2003-2004	86
2004-2005	249
2005-2006	303
2006- 31/03/07	74 *
2007-2008	343
2008/2009	227
2009/2010	121
TOTAL (11.75 years)	2136

Total small sites completions over the last 4.75 years (1st July 2005-31st March 2010) for Pembs County have been 1124 units ie average of 225 pa.

Completions over last 11.75 year period = 2136; ie average of 182 p.a.

Agreed projection for next 5 years for Pembs County @ 225 units

NB The figures shown in Annex 3 (a) and (b) are those supplied by the County Council and the National Park Authority for the 2005 study.

These are updated records and may not match year on year with the information published in the previous studies as previously supplied.

ANNEX 4: SITE SCHEDULE

