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## Introduction

- i. The Background Paper HC2 Scale and Location of Growth (2010) was published in December 2010 as an evidence paper for the Pembrokeshire County Council Local Development Plan.
- ii. The Deposit Plan consultation period for the Local Development Plan ran from the 26<sup>th</sup> January 2011 – 9<sup>th</sup> March 2011. During that period a number of representors raised issues regarding information on the scale and location of growth proposed for the Plan area.
- iii. This addendum has been published to support the original Scale and Location of Growth Paper (2010) and aims to provide clear responses to the issues raised by representors in their responses to the Deposit Local Development Plan and an updated position on any new sources of information published since the base date of the Deposit Plan. This paper should be read in conjunction with that original Background Paper. The paper is presented in three sections, considering issues of the scale of growth, location of growth and conclusions respectively.
- iv. Critical challenges in relation to the scale of growth section addressed in Section 1 are:
  - Which primary population projections were employed in setting the LDP Housing Requirement (SP7 of the Deposit Local Development Plan) and why were they chosen?
  - Should the LDP Housing Requirement be altered to reflect the Welsh Government 2008 based household projections, released after the Deposit Plan was published in 2010?
  - Did the methodology used to identify a Housing Requirement recognise differences between households and dwellings?
  - Should the allowance of 5% of flexibility and choice, together with a 20% allowance for non-delivery form part of the calculation for the Housing Requirement?
- v. This section concludes by recommending a Focussed Change for the Housing Requirement for the Local Development Plan.
- vi. Critical challenges in relation to the location of growth addressed in Section 2 are:
  - What does a 'balanced distribution of growth' mean in numerical terms?
  - Is the Housing supply identified in the Deposit Local Development Plan appropriate in number, location and type?
- vii. Section 2 provides a detailed numerical breakdown of the different elements contributing to the projected Housing Land Supply for Pembrokeshire over the Plan period. It includes figures demonstrating

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the spatial split of all the different elements that contribute to Pembrokeshire's Housing Land Supply and discusses how in combination, these contribute towards a balanced distribution of growth and how the scale and nature of different elements contributing to the housing land supply reflect the Plan strategy.

- viii. It then considers the impact of proposed Focussed Changes to Housing Allocations on the Plan's Land Supply and distribution of growth.
- ix. Section 2 concludes that the Housing Supply identified in the Deposit Local Development Plan, as modified by proposed Focussed Changes, is appropriate and sufficient to meet the Housing Requirement for the Plan area for 2011- 2021.
- x. Section 3 summarises the recommendations and conclusions of this report.

## 1. Scale of Growth - Housing Requirement

### 1. Which primary projections were used to inform the Deposit Local Development Plan and why were they chosen?

1.1 Planning Policy Wales (Edition 4 – February 2011, paragraph 9.2.2) states that Local Planning Authorities should use the latest Household Projections produced by Welsh Government (WG) as the first considerations in assessing the housing requirement for the Plan area. Where a Planning Authority wishes to deviate from Welsh Government projections, PPW states that it must be justified by a local planning authority's own "preferred policy-based projections" (Edition 4 – February 2011, paragraph 9.2.2).

1.2 At the Preferred Strategy stage PCC produced its own population projections (see Background Paper HC1: Population, Household and Labour Force Projections, 2008) as no data at a sub-Pembrokeshire level existed (to consider the National Park population). Between the publication of the Preferred Strategy and Deposit Plan the then Welsh Assembly Government published only 2006-based county-wide projections (published in 2009).

1.3 During the Plan period 2011-2021 the 2006-based WG projections predict that there will be an increase from 54.7 to 61.3 thousand households (a net 6,600 additional households) formed in Pembrokeshire. The projections indicate an expectation that the rate of household growth will decrease throughout the plan period and beyond. The PCC projections anticipate an increase from 51.3 to 55.8 thousand households (a net 4,500 additional households) over the same period.

1.4 The Scale and Location of Growth Background Paper (2010) states that:

1.5 *"Given the discrepancy between the projections produced by the WAG and by the Council, it is proposed that the housing provision is set at the higher of the two projections, which is the WAGs."* (Scale and Location of Growth Paper, 2010 paragraph 2.25).

1.6 The Scale and Location of Growth Background Paper (2010) explains that the WG 2006-based projections provided a starting point only for the policy led housing requirement in the Deposit LDP which also took into account:

- Local Strategies and Plans
- The local economy, including historic rates and demand

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- Social considerations, including the need for affordable housing
- Environmental implications (Sustainability Appraisal)

1.7 More details on how these elements combine to result in a figure are included in Section 2 of the Scale and Location of Growth Background Paper (2010). In broad terms however the key considerations for the requirement are:

- The figure reflects the overall WG Household projections for Pembrokeshire but uses extrapolation to identify the requirement for the PCC Planning area (excluding the amount of housing being provided in the neighbouring Pembrokeshire Coast National Park Authority area);
- The figure reflects the commitment of the Council in its strategies to maximise affordable housing delivery (expressed in the Community Plan and the Council's Housing Strategy); provision of more market housing can assist in maximising delivery of Affordable Housing which is negotiated on market sites.
- The figure is considered a realistic target on the basis of historic build rates but also incorporates additional units because of lower completions over the period 2006 – 2011 (paragraph 2.32 Scale and Location of Growth).
- The figure is considered to be appropriate in terms of environmental impact - Sustainability Appraisal considered that location of development rather than scale would have more bearing on environmental implications and that strategic policies such as for housing provision, should be considered in combination with detailed policies to form accurate judgement of its environmental implications.

1.8 These different elements resulted in the Deposit Local Development Plan Housing Requirement of **5,600 dwellings**; this was listed in Policy SP7.

1.9 PCC has always considered that projections should be a starting point for policy decisions. There are a number of uncertainties in the projections, particularly with regards to the components of change, most importantly migration which was under review by the Office of National Statistics. PCC has not reviewed its own projections because of these remaining uncertainties which will be clarified with the publication of the 2011 census information.

**2. Should the LDP Housing Requirement be altered to reflect the Welsh Government 2008-based household projections, released after the Deposit Plan was published in 2010?**

1.10 In 2010 (after the base date for production of the Deposit Local Development Plan) the Welsh Government issued household projections for Wales, Local Authorities and National Park Authorities, based on 2008 data. The projections for Pembrokeshire are shown below, with the final figures in Row C derived by subtracting the National Park figure from the whole county figure to give a Plan area projection.

**Table 1: WG 2008-based Household projections by Plan area**

		2008	2013	2018	2023
A	Pembrokeshire	52,100	55,200	58,100	60,600
B	Pembs Coast NPA	10,200	10,600	11,000	11,300
C	PCC Plan area (A-B)	41,900	44,600	47,100	49,300

1.11 The Local Development Plan will cover a Plan period from 2011 – 2021. The above figures clearly do not match the Plan period exactly; the table following paragraph 1.13 extrapolates the figures above into the Plan period.

1.12 The projections above indicate that the rate of household growth is expected to fall; between 2008 and 2013, the Plan area rate of growth is forecast at 6.44% while from 2018 to 2023 the rate of growth is 4.67%. This uneven rate of growth needs factoring into the projected figure for the Plan period, but as annual rates of increase have not been provided the best method available is to break the projection down into 5-year segments and calculate pro-rata change within those 5-year periods.

1.13 There are three constituent parts to deriving a household projection for the Plan period 2011 – 2021:

- i Pro-rata apportionment of 2008-2013 growth

$$\frac{(2013 \text{ total} - 2008 \text{ total})}{\text{Total years (5)}} \times \text{Number of years included in Plan period}$$

i.e.  $\frac{(44,600 - 41,900)}{5} \times 2 = 1,080$  households

- ii Entire 2013 – 2018 growth = 2,500 households

- iii Pro-rata apportionment of 2018-2023 growth

$$\frac{(\text{2023 total} - \text{2018 total})}{\text{Total years (5)}} \times \text{Number of years included in Plan period}$$

i.e.  $\frac{(49,300 - 47,100)}{5} \times 3 = 1,320$  households

- iv Total projected household increase in the Plan area, 2011 – 2021 = 1,080 + 2,500 + 1,320 = **4,900 households.**
- v The same apportionment method has been applied to the whole County and National Park projections, to produce the table below, estimating the household figures at the beginning and end of the LDP plan period.

**Table 2: WG 2008-based Household projections by Plan area 2011-2021**

		2011	2021		Total Change
A	Pembrokeshire	53,960	59,600		5,640
B	Pembs Coast NPA	10,440	11,180		740
C	PCC Plan area (A-B)	43,520	48,420		4,900

1.14 The 2008-based projections have seen the Welsh Government reduce their expectations of household growth over the next 10 – 15 years, for the whole county and the two Plan areas within Pembrokeshire. The previous projections, published in 2009 and based on 2006 data, anticipated an overall county-wide increase of 6,600 households between 2011 and 2021 – at a ten-year growth rate of 12%. The 2008-based projections, by contrast are estimated to project an increase of 5,640 over the same time period, at a rate of 10.5% over ten years.

1.15 Neither the 2006-based or 2008-based projections provide data below the Local Authority level for Pembrokeshire. However by using the county-wide projection and the National Park Authority’s LDP it is possible to estimate the likely number of households required in the PCC Plan area. Using the 2006-based projections this is 5,200 households. Using the 2008-based projections this is 4,900 households – a decrease of 300.

1.16 Given the advice from Planning Policy Wales (Edition 4 – February 2011, paragraph 9.2.2) that Household Projections produced by Welsh Government (WG) should be the first considerations in assessing the housing requirement for the Plan area, a Focussed Change is proposed to amend the Housing Requirement figure.



## 2. Did the methodology used to identify a Housing Requirement recognise differences between households and dwellings?

1.17 In order to assess the number of dwellings required to accommodate projected additional households, there is a need to factor in the relationship between dwellings and households. The Home Builders Federation in their representation on the Deposit Local Development Plan state that:

*"There is a distinct difference between a dwelling and a household. That is, there will usually need to be a larger number of dwellings provided in order to accommodate a particular figure for households, due to the existence of empty properties and people living in second homes etc. "*  
**(Home Builders Federation, Representation 1533/DP/01).**

1.18 The Scale and Location of Growth Background Paper (2010) did not make reference explicitly to the conversion of household projections to dwellings and the figure of 5,600 dwellings did not incorporate this conversion. However Appendix 3 of the Deposit Local Development Plan included two elements additional to the Housing Requirement, a 5% allowance to provide flexibility for efficient and buoyant new housing market and a 20% allowance for permissions that are not implemented.

**Table 3: Extract from Appendix 3: Housing Requirement and Supply**

<b>Housing Requirement 2011-2021</b>	
Projected additional households in the Plan area, 2011-2021	5,200
Additional households in the Plan area 2006-2011	3,400
Less housing completions 2006-2011	-3000
Total PCC Housing requirement 2011-2021	5,600
<i>Plus</i> 5% to provide flexibility for efficient and buoyant new housing market	280
<i>Plus</i> allowance for 20% of permissions that are not implemented	1,470
Net required housing provision 2011-2021	<b>7,350</b>

1.19 Evidence from the Welsh Government’s Statistical Directorate suggests that in Pembrokeshire the multiplier from households to dwellings was 1.08 in 2010 (Annual Figures). PCC projections based on an analysis of the 2001 census in PCC’s Background Paper HC1: Population, Household and Labour Force Projections, 2008 indicated that a dwelling to household ratio in the projections up to 2021 for the whole County was 10%. As a proportion of dwellings in Pembrokeshire 0.051 were vacant and 0.061 dwellings were second homes. These total figures however hide the fact that there were three times as many dwellings used as second homes in the PCNPA area. For the PCC Plan area the proportion of vacant dwellings was 0.052 and the remaining second residences as a proportion of dwellings was 0.024 (total 0.074). The close alignment of the WG derived multiplier with that of the PCC analysis of the 2001 census, suggests that 1.08 is an appropriate dwelling to household ratio for the PCC Plan area. On this basis therefore an 1:1.08 household to dwelling ratio is considered appropriate for the PCC Plan area, recognising the lower proportion of second homes in comparison with the National Park.

1.20 This means that for a single household there is a need for 1.08 dwellings (to allow for vacant dwellings and second homes within the market). It is important that the housing requirement and the housing supply both refer to dwellings and figures should be adjusted accordingly.

A revised Appendix 3 produced on the basis of this methodology would look like this:

**Table 4: Revised Appendix 3**

<b>Housing Requirement 2011-2021</b>	
Projected additional households in the Plan area, 2011-2021 (based on 2008-based WG household projections)	4,900
Additional households in the Plan area 2006-2011	3,400
Less housing completions 2006-2011	-3,000
Total	5,300
Plus multiplier for dwellings (X 1.08)	424
<b>Total PCC Housing Requirement 2011-2021</b>	<b>5724</b>

**Recommendations**

1.21 The methodology used to identify a Housing Requirement should incorporate a household to dwelling ratio of 1:1.08.

- 1.22 A revised Appendix 3 reflecting Table 4 should be recommended as a Focussed Change and the figure for the number of dwellings required for delivery in SP7 Housing Requirement should also be amended to **5724**.

**3. Should the allowance of 5% of flexibility and choice, together with a 20% allowance for non-delivery form part of the calculation for the Housing Requirement?**

1.23 The LDP Housing Requirement published as Appendix 3 in the Deposit LDP included an allowance of 5% to provide flexibility for an efficient and buoyant new housing market. This 5% was intended to allow for demolition, vacancies and second homes in the housing market. Following consideration of representations received on the Deposit Local Development Plan it is recognised that this should have been more clearly explained as being to allow for the difference between household projections and dwellings. It is also recognised that as discussed in Section 2, a figure of a 1.08 multiplier for dwellings is a more accurate and robust figure to allow for this. The 1.08 multiplier for dwellings will be used to produce a figure for the Housing Requirement. This however, makes the Deposit LDP's 5% allowance redundant and this will therefore be removed from the calculations.

1.24 It is recognised following objections to the Deposit LDP that the additional allowance of 20% owing to planning permissions not implemented, should not be *added* to the housing requirement. It is however important to recognise this long-standing trend in the housing supply. Therefore the housing *supply* will incorporate an allowance of additional flexibility of approximately 20%. Monitoring has indicated that 20% of planning permissions are not implemented and that this figure is across the Plan area (in both rural and urban areas).

**Recommendations:**

1.25 **To incorporate a flexibility allowance of approximately 20% in the housing supply.**

**1.26 Section 1 Conclusions**

- There are a range of Household projections for Pembrokeshire: these include the Welsh Government 2006-based and 2008-based projections and the Council's own population and household projections. PPW is clear in stating that household projections should

form the starting basis for setting a LDP housing requirement. The Welsh Government 2008-based household projections should form the basis of the Deposit Local Development Plan's Housing Requirement, noting that this has a small impact on reducing the housing requirement.

- A Focussed Change should be proposed by the Council to clarify the relationship between dwellings and households in the production of a Housing Requirement for the LDP. The most recent information from the Welsh Government Statistics Office suggests that this is at a rate of 1.08 for Pembrokeshire.
- The 5% flexibility allowance and the 20% allowance for non development of permissions should not be included in the Housing Requirement methodology.
- Flexibility for non development of permissions should continue to be included as a component of the housing supply.

1.27 Based on the conclusions above and incorporating the policy approaches used previously to calculate the Housing Requirement for Pembrokeshire (projected development in the neighbouring National Park) and historic build rates within the Plan area, a Focussed Change is proposed to Appendix 3 in the Local Development Plan to include the Table 4 as a revised Table.

1.28 A further Focussed Change is proposed to SP7 Housing Requirement to amend the figure of the number of dwellings to be delivered by the Plan to **5,724**.

## **2. Distribution of Growth – Housing Supply and Location**

2.0 The key questions raised by representors in response to the Deposit Local Development Plan were

- What does a ‘balanced distribution of growth’ mean in numerical terms?  
and
- Is the Housing supply identified in the Deposit Local Development Plan appropriate in number, location and type?

2.1 In addition to answering these questions, this section will consider the Focussed Changes proposed to Housing Allocations in the Local Development Plan and the implications of this for the LDP Housing Supply and distribution of growth.

### **1. What does a ‘balanced distribution of growth’ mean in numerical terms?**

2.2 Table 5 on page 14 illustrates the numerical breakdown of all of the elements that contribute to the Housing Land Supply published in the Deposit Local Development Plan. This indicates that overall 7,554 dwellings were projected as being available as Housing Supply for the LDP and that 54.1% of these were located in urban areas and 45.9% of these were located in rural areas. When the elements that make up the housing supply are considered however, we can see that the type of units planned for vary according to the location. 68% of anticipated LDP allocations are in urban locations. Units in rural areas include those currently consented (44.6%), 31.8% of LDP allocations, 50% of projected windfall development and 100% of development in Local Villages (primarily for affordable housing), conversions and new countryside units for essential rural workers. Further figures providing more detail on each of these elements are provided in the following pages.

**Table 5: Total Projected Housing Supply 2011 – 2021**

<b>Projected Housing Supply 2011 -2021</b>		<b>Urban total</b>	<b>Urban %</b>	<b>Rural total</b>	<b>Rural %</b>
<b>A1. Existing Full and Reserved Matters permissions @ 10th March 2010</b>	<b>2539</b>	<b>1406</b>	<b>55.4</b>	<b>1133</b>	<b>44.6</b>
A2.Total units on LDP allocations	5062 <sup>1</sup>	3453	68.2	1609	31.8
A3.Units on LDP allocations without full/RM permission	4492 <sup>2</sup>	2883	64.2	1609	35.8
A4 Less units on LDP allocations that will not be delivered during the plan period	489 <sup>3</sup>	411	84.0	78	14.0
<b>B. Net allocated units 2011 - 2021 (A3 – A4)</b>	<b>4003</b>	<b>2472</b>	<b>61.8</b>	<b>1531</b>	<b>38.2</b>
Windfall capacity	1030 <sup>4</sup>	514	49.9	516	50.1
<b>C. Projected windfall capacity (40%) of capacity likely to gain planning permission</b>	<b>412</b>	<b>205.6</b>	<b>49.9</b>	<b>206.4</b>	<b>50.1</b>
<b>D. Projected number of Local Village units</b>	<b>200</b>	<b>0</b>	<b>0.0</b>	<b>200</b>	<b>100.0</b>
<b>E. Projected number of new countryside units plus rural conversions</b>	<b>400</b>	<b>0</b>	<b>0.0</b>	<b>400</b>	<b>100.0</b>
<b>F. Total Housing Land Supply (A1+B+C+D+E)</b>	<b>7554</b>	<b>4083.6</b>	<b>54.1</b>	<b>3470.4</b>	<b>45.9</b>

<sup>1</sup> This figure is the number of units on LDP allocations in the Deposit Plan. The figure printed in Appendix 3 was 5070, this should have been 5062.

<sup>2</sup> The figure printed in Appendix 3 was 4,451 this should have been 4,492.

<sup>3</sup> The figure printed in Appendix 3 was 561, this should have been 489

<sup>4</sup> The figure printed in Appendix 3 was 1097, this should have been 1030.

**Existing Full and Reserved Matters permissions at 10<sup>th</sup> March 2010**

2.3 The base date for the LDP housing supply is the 10<sup>th</sup> March 2010. These are units which already had planning permission on the 10<sup>th</sup> March 2010. As full planning permission is generally given for five years, it is possible that some of these units may not be built until the Plan period. They could therefore impact on the potential distribution of growth that occurs during the LDP and need to be included in any assessment of housing land supply. Table 7 shows that permissions exist at all levels of the settlement hierarchy in Pembrokeshire. 55.4% of these planning permissions are in the Hub Towns (Haverfordwest, Milford Haven, Pembroke, Pembroke Dock, Neyland, Fishguard and Goodwick), whilst 45.6% of these permissions were located in the Rural Town of Narberth, Service Centres, Service Villages, Large Local Villages, Small Local Villages and in the Countryside.

**Table 6 Full and Reserved Matters Permissions at 10<sup>th</sup> March 2010 by Settlement Hierarchy Position**

<b>Level of Settlement Hierarchy</b>	<b>Number of dwellings permitted</b>	<b>%</b>
<b>Hub Town</b>	<b>1406</b>	<b>55.38</b>
<b>Town</b>	<b>55</b>	<b>2.17</b>
<b>Service Centre</b>	<b>199</b>	<b>7.84</b>
<b>Service Village</b>	<b>411</b>	<b>16.19</b>
<b>Large Local Village</b>	<b>68</b>	<b>2.68</b>
<b>Small Local Village</b>	<b>69</b>	<b>2.72</b>
<b>Countryside</b>	<b>331</b>	<b>13.04</b>
<b>Total</b>	<b>2539</b>	<b>100.00</b>
<b>Total Urban</b>	<b>1406</b>	<b>55.4</b>
<b>Total Rural</b>	<b>1133</b>	<b>45.6</b>

**Deposit Local Development Plan Allocations**

2.4 LDP allocations have been identified following analysis of the particular nature and characteristics of different settlements, in accordance with their position in the settlement hierarchy and according to the methodology established in the Site Assessment Report (2010). The Settlement Strategy for the LDP is set out in Chapter 5 of the Deposit LDP. Paragraphs 5.55 to 5.58 explain the distribution. Strategic Policies SP14 Hub Towns, SP 15 Rural Settlements and SP16 The Countryside identify the vision for each level of the hierarchy. The level of growth identified is broadly similar for settlements at similar positions in the hierarchy, however it also reflects the individual circumstances of each settlement including existing planning permissions and land use constraints (as set out in paragraph 3.19 of the Scale and Location of Growth Paper, 2010). Table 7 demonstrates the distribution of allocations across the Settlement Hierarchy.

2.5 No allocations are identified in settlements below the Service Village level in line with the LDP strategy set out in Chapter 5 of the Deposit LDP.

**Table 7: Distribution of Deposit LDP Housing Allocations by Settlement Hierarchy position**

<b>Settlement Hierarchy Level</b>	<b>Number of Units</b>
Hub Town Total	3453
Town Total	147
Service Centre Total	455
Service Village Total	1007
<b>Total</b>	<b>5062</b>
Total Urban	3453 (68.2%)
Total Rural	1609 (31.8%)

2.6 A small number of sites allocated in the LDP had reserved matters or full planning permission for units on these sites at the base date of 10<sup>th</sup> March 2010. To prevent double counting, these units have been identified and excluded from the allocation number included in the Housing Land Supply.

2.7 Table 8 demonstrates the distribution of allocations across the Settlement Hierarchy when those sites with units with Full or Reserved Matters Planning Permission are excluded from the table.



**Table 8: Distribution of Deposit LDP Housing Allocations by Settlement Hierarchy position excluding sites with planning permission**

<b>Settlement Level</b>	<b>Hierarchy</b>	<b>Number of units</b>
Hub Town Total		2883
Town Total		147
Service Centre Total		455
Service Village Total		1007
<b>Total</b>		<b>4492</b>
<b>Total Urban</b>		<b>2883</b>
<b>Total Rural</b>		<b>1609</b>

- A small number of allocations are identified in the Plan as being allocations that will not be completed during the Plan period. These allocations are:
  - Haverfordwest Slade Lane North (HSG/040/00273)
  - Llangwm – Opposite the Kilns (HSG/063/00024)
  - Maenclochog – North West of the Globe Inn (HSG/081/LDP/01)

2.8 The Development Sites SPG provides information on each site and the number of units anticipated to be built during the Plan period. The Slade Lane reference was omitted in error from the consultation Development Sites SPG but will state:

*Notes: The two Slade Lane sites have potential for 971 dwellings, however a maximum of 560 are anticipated to be developed during the LDP period (to 2021). The further 411 dwellings it is anticipated, will be built after the LDP Plan period. These figures are reflected in the Housing Land Supply Figures in Appendix 3: Housing Requirement and Supply 2011-2021 of the Local Development Plan.*

2.9 The two Slade Lane allocations have outline planning permission (reference 07/0921/PA).

2.10 Table 5 demonstrates the number of units anticipated to be developed over the Plan period.

**Table 9: Deposit LDP Housing Allocations not expected to be entirely completed during Plan period.**

<b>Sites not fully developed during LDP period</b>	<b>Expected to be built in LDP Period</b>	<b>Total potential of allocation</b>	<b>Units not built during LDP period</b>
Llangwm - Opposite the Kilns	25	75	50

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Maenclochog - North West of the Globe Inn	30	58	28
Haverfordwest - Slade Lane North and South	560	971	411
<b>Total</b>	<b>615</b>	<b>1104</b>	<b>489</b>

2.11 Table 10 identifies how many units are allocated at each hierarchy level when the units that will not be built during the Plan period are removed from table 4:

**Table 10 Deposit LDP Housing Allocations by position in the Settlement Hierarchy excluding units not expected to be entirely completed during Plan period.**

<b>Settlement Hierarchy Level</b>	<b>Number of units</b>
Hub Town Total	2472
Town Total	147
Service Centre Total	455
Service Village Total	929
<b>Total</b>	<b>4003</b>
<b>Total Urban</b>	<b>2472 (61.8%)</b>
<b>Total Rural</b>	<b>1531 (38.2%)</b>

## Windfall Capacity

2.12 The approach taken to identifying Windfall Capacity is set out in Background Paper HC13 Windfall Capacity (2011). The figures used for the LDP Housing Supply assume an average build at 25dph in rural areas and 30dph in urban areas.

**Table 11 Windfall capacity by position in Settlement Hierarchy:**

Settlement Hierarchy	Area (Hectares)	35dph	30dph	25dph
Hub Towns	18.07	606	514	N/A
Rural Town	0	0	0	0
Service Centres	3.14	102	86	75
Service Villages	19.19	618	525	441
<b>Pembrokeshire Total</b>	<b>40.4</b>	<b>1326</b>	<b>1125</b>	<b>516</b>

**Table 12 Windfall capacity urban/rural split:**

Location	Unit Number	Percentage
Rural areas at 25dph	516	50.1
Urban Areas at 30dph	514	49.9
<b>Total</b>	<b>1030</b>	

2.13 The amount of land potentially available as Windfall sites has been managed as part of the LDP strategy. This strategy involved the identification of appropriate settlement boundaries across the Plan area (see Background Paper G10 Site Assessment Report pages 14-16). The LDP strategy to limit growth in Local Villages means that different settlement boundaries have been identified in settlements below Service Villages – see below.

2.14 The Housing Supply figures assume completion of 40% of available windfall sites over the Plan period but that this would be evenly spatially distributed.

### **Projected number of Local Village Units**

2.15 The methodology used to identify settlement boundaries in Local Villages is set out in the Background Paper G10 Site Assessment Report pages 14-16. Assessment by officers was that generally each Local Village could accommodate 2 units within the settlement boundary as infill. These figures are based on this assumption, however exception sites could also add to this total. In line with the LDP strategy this policy approach is specifically designed to ensure that new housing in Local Villages is predominantly to meet affordable housing for local need.

### **Projected number of Countryside Units**

2.16 This number is based on completions from historical monitoring and includes likely permissions from rural exception dwellings and conversions.

### **Spatial Distribution of development**

2.17 The settlement hierarchy ensures that development will be evenly distributed across the Plan area. The Scale and Location of Growth Paper (paragraph 3.17 page 24) clarified that nowhere within the Plan area is further than 3 miles from a service village.

## **2. Is the Housing supply identified in the Deposit Local Development Plan appropriate in number, location and type?**

- 2.18 The balanced distribution of growth referred to in the LDP Strategy in the Deposit LDP consists of a number of different elements.
- 2.19 The LDP strategy differs from the JUDP strategy in a number of ways, but also has some broad similarities. Since the JUDP was drafted Pembrokeshire has seen a significant increase in the number of people in need of affordable housing, particularly in rural areas. Pembrokeshire has also in common with other areas seen a decline in rural services. The JUDP allocated housing provision on a 70% urban and 30% rural strategy. In terms of Housing Allocations 68% of the LDP allocations are urban and 32% are rural. If (as in the JUDP Strategy) Narberth was considered part of the urban figure, this would represent a 71% urban allocation and 29% rural allocation. Whilst this is the allocations split, the overall distribution of growth through all means in the Plan is a 54.1% urban, 45.9% rural split. This overall division is influenced by existing permissions, future windfall development and the LDP strategy of delivering affordable housing in Local Villages. The overall division is different to the JUDP strategy but this is as a result of the strategy addressing the issues identified for the LDP, particularly affordable housing.
- 2.20 During the LDP period approximately 2539 units given planning permission under the current JUDP are likely to be delivered – these are 55% urban and 44% rural (Narberth included here in the rural category).
- 2.21 The windfall capacity across the Plan area has been controlled by a strategy which promotes settlement boundaries, offering a clear identification of where market housing would be appropriate. The methodology for drawing settlement boundaries included small infill plots where appropriate. Of the windfall capacity available 49.9% is in urban areas and 50.1% in rural areas. These tend to be individual small plots already within the built up areas of the settlement.
- 2.22 In line with the strategy of the LDP, only affordable homes to meet local need are anticipated to be developed in Small Local Villages. In Large Local Villages 50% of all development will be for affordable homes. These are 100% rural in location.
- 2.23 A small proportion of additional units will be those developed as countryside units for rural exception workers and conversions.
- 2.24 In total the spatial distribution across the Plan area will reflect the pattern of the existing population – as identified in the Deposit Plan 45% of the population already live in rural area (paragraph 5.57). However the strategy of the LDP has been to identify carefully the scale and type of housing appropriate to different settlements based on analysis of services and recognition of the need for affordable housing across Pembrokeshire. This strategy is considered to be the most sustainable for the Plan area –in

economic, environmental and social terms. This assessment is supported by the Sustainability Appraisal of the Plan.

### 3. What are the implications of Focussed Changes proposed to LDP Housing Allocations on the Housing Land Supply for the LDP and Spatial Distribution?

2.25 Table 13 below lists the Focussed Changes affecting Housing Allocations proposed by the Council following the Deposit Plan, Alternative Sites and Further Alternative Sites consultations.

**Table 13 Focussed Changes Affecting GN 28 Residential Allocations**

<b>Housing Allocations</b>	<b>Site Reference</b>	<b>Minimum number of units</b>	<b>Site Area (ha)</b>	<b>Focussed Change</b>	<b>Difference in minimum of units from Deposit</b>
Haverfordwest – Slade Lane North	HSG/040/00273	48 (459*)	15.31	Provide clarity on Include figure of 48 in table to provide clarity on precise numbers anticipated for delivery in Plan period.	
Milford Haven Steynton Greenmeadow w Beaconing Field	HSG/086/00129	149	4.354	Change name of site to Beaconing Field and amend site area to correct drafting error.	
Milford Haven Steynton Myrtle Hill	HSG/086/00226	102	3.4	Delete entry as building work has started on site.	-102
Milford	HSG/086/00318	72	2.9	Amend site	

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Haven Castle Pill			3.05	area to correct drafting error.	
Fishguard - Maesgwynne Farm	HSG/034/00215	399	<del>13.31</del> 13.24	Amend site area to correct drafting error.	
Abercych - Adjacent to Waterloo Cottage	HSG/001/LDP/01	8	<del>0.86</del>	Delete site - no longer considered realistic and appropriate.	-8
Blaenffos - Adjacent to Hafod	HSG/006/00003	<del>16</del> -10	<del>1.68</del> 0.93	Amend area of allocation - consequential change to numbers and site area.	-6
Hundleton - East of Bentlass Road	HSG/046/00015	40-31	1.26	Reduce density.	-9
Jeffreyston - Rear of Beggars Roost & Sunny Side	HSG/047/LDP/01	14-18	0.9		+4
Llangwm - Opposite the Kilns	HSG/063/00024	25 (75*)	3.01	Include figure of 25 in table to provide clarity on precise numbers anticipated in Plan period.	
Maenclochg - North West of the Globe Inn	HSG/081/LDP/01	30 (58*)	2.31	Include figure of 25 in table to provide clarity on precise numbers	

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				anticipated in Plan period.	
Milton West of Milton Meadows	HSG/087/LDP/0 1	15	0.75	Allocation deleted.	-15
Pentlepoir – Land adjacent to Coppins Lodge	HSG/099/LDP/0 1	33-35	1.68	Number of units increased	+2
Pont yr Hafod – Land Opposite School	HSG/103/LDP/0 1	10	0.44	Allocation deleted.	-10
Puncheston – Opposite Bro Dewi	HSG/108/LDP/0 1	8 6	0.39	Number of units decreased.	-2
Robeston Wathen – South of Robeston Court	HSG/113/LDP/0 1	12-14	0.63	Number of units increased.	+2
St Florence – North of Parsons Green	HSG/123/ldp/01	21-26	0.86 1.17	Area and number of units increased.	+5
Templeton – South of the Boars Head Junction	HSG/132/LDP/0 1	24-28	1.2 1.13	Number of units increase.	+4
Total change in minimum housing units					-135
Total change in housing supply (removing the units already started)					-33

2.26 The total difference in unit numbers from the combined Focussed Changes proposed to the Deposit Local Development Plan equates to - 135. However this includes the de-allocation of the Milford Haven Steynton Myrtle Hill housing site as a result of its commencement. The figure of 102 should therefore not be discounted from the Housing Supply as these units will be delivered over the course of 2011-2021.



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### Recommendations:

2.27 To incorporate all of the changes to the Housing Supply resulting from other Focussed Changes, a revised Housing Supply table should be included in Appendix 3 of the Local Development Plan as a Focussed Change. The revised table is shown below:

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**Table 14**

Reference	Projected Housing Supply 2011 -2021 with Focussed Changes		Urban total	urban %	Rural total	rural %
<b>A</b>	<b>Existing Full and Reserved Matters permissions @ 10th March 2010</b>	<b>2539</b>	<b>1406</b>	<b>55.4</b>	<b>1133</b>	<b>44.6</b>
B	Total units on LDP allocations	4927	3351	68.0	1576	32.0
C	Units on LDP allocations without full/RM permission	4357	2781	63.8	1576	36.2
D	Less units on LDP allocations that will not be delivered during the plan period	489	411	84.0	78	16.0
E	Plus units deleted as LDP allocations because building has commenced	102	102	100.0	0	0.0
<b>F</b>	<b>Net allocated units 2011 - 2021 (C-D+E)</b>	<b>3970</b>	<b>2472</b>	<b>62.3</b>	<b>1498</b>	<b>37.7</b>
G	Windfall capacity	1030	514	49.9	516	50.1
<b>H</b>	<b>Projected windfall capacity (40%) of capacity</b>	<b>412</b>	<b>205.6</b>	<b>49.9</b>	<b>206.4</b>	<b>50.1</b>
<b>I</b>	<b>Projected number of Local Village units</b>	<b>200</b>	<b>0</b>	<b>0.0</b>	<b>200</b>	<b>100.0</b>
<b>J</b>	<b>Projected number of new countryside units plus rural conversions</b>	<b>400</b>	<b>0</b>	<b>0.0</b>	<b>400</b>	<b>100.0</b>
<b>K</b>	<b>Total Housing Supply and Urban/Rural split (A+F+H+I+J)</b>	<b>7521</b>	<b>4083.6</b>	<b>54.3</b>	<b>3437.4</b>	<b>45.7</b>

**Relationship between Housing Requirement and Supply**

2.28 The total Housing Supply available for the LDP Plan period is 7,521 dwellings. The Housing Requirement for the LDP Plan period is 5,724. Historic monitoring of planning permissions indicates that 20% of planning permissions do not get built and that this is evenly distributed across the Plan area.

2.29 If 20% of all elements of the Housing Supply apart from the allocations are not delivered, this would result in the following number of units not being delivered during the Plan period:

<b>Description</b>	<b>Total</b>	<b>20% of total</b>
Existing Full and Reserved Matters permissions @ 10th March 2010	2539	507.8
Projected windfall capacity (40%) of capacity	412	82.4
Projected number of Local Village units	200	40
Projected number of new countryside units plus rural conversions	400	80
	<b>3551</b>	<b>710</b>

2.30 Removing this from the overall provision figure leaves a total supply of 6811 (7,521-710). This means an overprovision of 1087 (6811-5724). Such an over-provision is not viewed as excessive given the need for flexibility and the need to maintain a 5 year land supply throughout the course of the Plan (even into the final year). This overprovision is also appropriate given that the PCC Site Deliverability Study indicates that a significant number of housing allocations will be delivered towards the end of the Plan period. The overall supply of land in the Plan will be monitored and reviewed throughout the course of the Plan.

**Recommendations:**

2.31 No additional change is proposed to the Housing Supply in response to review of the Scale and Location of Growth.

## Section 2 Conclusions

- The location of growth consists of a number of different elements.
- The strategy identified by the Council means that it is important not only to consider where new development is proposed but also its nature. For example development in Local Villages is predominantly to address the need for local needs affordable housing.
- The proposed location of growth is appropriate for the Plan area and based on a sound Plan strategy.
- A Focussed Change is proposed for Appendix 3 to include a new housing supply table.
- The overall housing supply available during the LDP period is **7521**.

**2.32** Based on the conclusions above a Focussed Change is proposed to Appendix 3 in the Local Development Plan to include Table 14. A further Focussed Change is proposed to clarify that the housing supply available during the LDP period is 7521.

### 3. Conclusions

3.1 This Scale and Location of Growth Addendum 2011 presents the following conclusions:

- The primary population projections employed in setting the LDP Housing Requirement are the WG 2008-based projections.
- The original methodology used to identify a Housing Requirement for the LDP did not adequately recognise the differences between households and dwellings and a change to the methodology will be required to produce a revised figure for the LDP.
- A balanced distribution of growth in numerical terms is shown in Table 14.
- The Housing Supply identified in the Deposit Local Development Plan is appropriate in number, location and type.
- The Focussed Changes proposed by the Council for Housing Allocations do not affect the LDP strategy.
- The Housing Supply of 7,521 is appropriate and sufficient to meet the Housing Requirement of 5,724.

### Summary of Focussed Changes Proposed

The following Focussed Changes are proposed to the LDP:

**SP7 Housing Requirement should be revised to read:**

**Provision is made for 7,521 dwellings in the Plan period, to enable delivery of 5,724 dwellings.**

Appendix 3 needs to be revised to include two separate tables:

Table 1: Housing Requirement 2011-2021

<b>Housing Requirement 2011-2021</b>	
Projected additional households in the Plan area, 2011-2021	4,900
Additional households in the Plan area 2006-2011	3,400
Less housing completions 2006-2011	-3,000
Total	5,300
Plus multiplier for dwellings (X 1.08)	424
<b>Total PCC Housing Requirement 2011-2021</b>	<b>5724</b>

Table 2: Projected Housing Supply 2011-2021

<b>Projected Housing Supply 2011 -2021 with Focussed Reference Changes</b>		<b>Urban total</b>	<b>urban %</b>	<b>Rural total</b>	<b>rural %</b>	
<b>A</b>	<b>Existing Full and Reserved Matters permissions @ 10th March 2010</b>	<b>2539</b>	<b>1406</b>	<b>55.4</b>	<b>1133</b>	<b>44.6</b>
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H	<b>Projected windfall capacity (40%) of capacity</b>	<b>412</b>	<b>205.6</b>	<b>49.9</b>	<b>206.4</b>	<b>50.1</b>
I	<b>Projected number of Local Village units</b>	<b>200</b>	<b>0</b>	<b>0.0</b>	<b>200</b>	<b>100.0</b>
J	<b>Projected number of new countryside units plus rural conversions</b>	<b>400</b>	<b>0</b>	<b>0.0</b>	<b>400</b>	<b>100.0</b>
K	<b>Total Housing Supply and Urban/Rural split (A+F+H+I+J)</b>	<b>7521</b>	<b>4083.6</b>	<b>54.3</b>	<b>3437.4</b>	<b>45.7</b>