

Report of the Planning Officer (Park Direction)

Subject: Welsh Language Communities Housing Plan

Purpose of this report

1. The purpose of this report is to agree a National Park Authority response to the above consultation. The closing date for responses is the 22nd February 2022. Officers have also prepared a draft response – see separate report – regarding ‘Planning legislation and policy for second homes and short-term holiday lets’.

Background

2. Pressure on housing in Wales is a well-documented issue and there are many factors contributing to this. The spiraling use of housing for short-term holiday lets and second homes, particularly in rural areas, is one such factor and has become the subject of controversy across Wales, evoking strong opinions for and against.
3. Second homes and holiday lets are often concentrated in and around Welsh-speaking communities and can have a detrimental effect on the use of Welsh in those communities which are crucial to the long-term flourishing of the language. Second homes, alongside other factors, also impact on the affordability and availability of housing for local people, sometimes leading to young Welsh-speaking people in particular leaving communities to find affordable housing elsewhere.
4. This is a complex matter and this consultation considers proposals across a wide spectrum of interests and are not limited to planning matters.
5. The Welsh Government is proposing an approach that will support existing housing programmes as well as trialing new approaches; make changes to the regulatory system relating to second homes and holiday letting accommodation; and use taxation to ensure second home owners can make a fair and effective contribution to communities in which they buy.

The Welsh Language Communities Housing Plan

6. This Plan is one of the Welsh Government's key priorities and considers how national interventions to protect Welsh-speaking communities and the language to thrive can be supplemented by other initiatives. Many of the initiatives will be trailed in Dwyfor in North Wales and this consultation explores how the collective package of interventions could be complemented at a community level to support and protect the Welsh language.
7. Full details of the proposals are summarised below and can be found in full in the consultation paper¹.

Summary of the Welsh Government Proposals

8. The following is a summary of the proposals out in the consultation paper:
 - To support the establishment of community-based organisations and businesses and vital services in our rural and coastal communities. This will include co-operative and community-led housing schemes and support community-based enterprises to establish and grow short-term holiday accommodation businesses so that profits can be re-invested to purchase housing stock to be made available to local people on a social rented basis;
 - To work with estate agents to explore innovative approaches to housing sales, including an initial period of marketing to the local community only;
 - To establish a network of cultural ambassadors to promote Welsh culture, heritage and the language.
 - To establish a commission to safeguard the future of the Welsh language as a community language.
 - To develop opportunities for young people to further attain educational aims, skills and work experiences within and outside of Wales and support those young people who want to continue living in the communities in which they were brought up, as well as create opportunities for people to return.
 - To extend the scope of the Economy and Welsh Language Roundtable to include housing, with a role of overseeing the progress of the Welsh Language Communities Housing Plan.
 - To protect Welsh place and historic property names.

¹ Link to the Welsh language communities housing plan consultation document: [welsh-language-communities-housing-plan-consultation-doc.pdf \(gov.wales\)](https://gov.wales/welsh-language-communities-housing-plan-consultation-doc.pdf)

Summary Response

9. The measures proposed are wide-ranging. Whilst some of the proposals relate to the work of the National Park Authority through the land use planning function, other elements are less familiar and are best responded to by those within the affected communities who will have better experience and knowledge of the issues affecting them.
10. One of the proposals with which the Authority has some experience is that of Community Land Trusts. The draft response provided in the Appendix 1 to this report details how, to date, they currently have had limited success in this area and would require improved resources – namely committed adequate funding and suitably qualified and experienced persons to bring projects forward.
11. The Authority's main response to second and short-term holiday lets is contained in a separate report, but the issue also cross-references to this consultation response. The proposals to use community-based short-term holiday lets to cross-subsidise affordable housing provision will be competing in an already crowded market and the success of the scheme will require an off-setting of individual or established business profits to achieve the greater community benefits.
12. Responses to other questions set out in the consultation paper are based on a positive approach to supporting communities through providing affordable housing, investing in Welsh language education and also through heritage and cultural elements that benefit the wider community and generate a greater rapport between the Indigenous and incoming residents.
13. The need to consider the aspirations of those selling properties or leaving communities and the impacts of those arriving and enrolling children into Welsh-language education are also important considerations.
14. The Welsh Government is seeking innovative solutions to this complex problem and Members may wish to contribute further to the response drafted in the appendix to this report.

Financial considerations

15. No additional/new financial considerations at this time.

Welsh Language considerations

16. The outcomes of the consultation are intended to support and enhance Welsh-speaking communities within the National Park.

Human Rights considerations

17. The proposals are seeking to redress balance and fair chances for Welsh-speaking communities.

Recommendations: Members are asked to:

1. **Consider the draft responses to this consultation and are invited provide additional comments by Monday 14th February 2022.**
2. **Give delegated powers to the Head of Park Direction in consultation with the Chairman and Chief Executive to sign-off the final response to the Welsh Government on the Welsh Language Communities Housing Plan.**

Background documents

Supplementary Planning Guidance: Developing Affordable Housing with a Community Land Trust: Pembrokeshire Coast National Park Authority 2021
[FINAL-CLt-Eng-1.pdf \(pembrokeshirecoast.wales\)](#)

Consultees: Martina Dunne, Gayle Lister, Joanna Rees-Wigmore, Nicola Gandy, Tegryn Jones

(For further information please contact Sarah Hirst, Planning Officer (Park Direction) extension 4863.)

Appendix 1: Draft Consultation Response

Welsh Government proposes to:

- Develop a package of support to help create community-led social enterprises that can:
 - Create job opportunities.
 - Secure services within a community.
 - Explore small community led housing interventions under the co-operative model.

Question 1

Do you think a co-operative or community-led housing model could help local people access affordable housing?

NPA Response

1. The National Park Authority is a planning authority and works with Pembrokeshire County Council as the housing authority for the area.
2. The National Park Authority is supportive of community-led social enterprises including the exploration of community-led interventions under the co-operative model and has adopted Supplementary Planning Guidance to assist communities in bring forward affordable housing developments with the help of Community Land Trusts.
[Community Land Trusts and Affordable Housing Supplementary Planning Guidance - Place Plan Toolkit - Pembrokeshire Coast National Park](#)
3. Experience of working with organisations, community groups and individuals to establish effective community land trusts to date has had limited success. For such models to be effective they need a capital funding programmes and experienced and regulated development partner(s). Experience shows that existing social housing grants will have already been committed by housing associations and local authorities and for schemes to be genuinely community-led requires an individual or group, independent of these established providers to take projects forward, with the necessary funding.
4. Communities need a fully funded, dedicated officer to lead projects and provide planning and development expertise to liaise with landowners, local authorities and others.

Question 2

How can Welsh Government encourage further participation in a co-operative or community-led housing model in Wales?

NPA Response

5. Experience would suggest that there is enthusiasm for community-led affordable housing schemes and the Welsh Co-Operative Centre has been instrumental in publicising the potential and benefits of such schemes. There remains a void between the ambition of communities and bringing developments to fruition. The requirements set out in response to question 1 above – name a properly funded, dedicated officer, developer partnership and adequate funding would assist in driving schemes forward and keep the community momentum alive.

Welsh Government proposes to:

- *Support an existing or newly-established community-based social enterprise to develop a business where a short-term holiday accommodation business can provide sufficient revenue to purchase stock for social rent.*

Question 3

What are the challenges to sustaining local interest and investment in social enterprises?

NPA Response

6. Supply of visitor accommodation is plentiful and the reduced regulation within peer to peer platforms allows individuals to bolster their own income during peak holiday seasons. Whilst much of the economy of rural Wales depends on tourism such schemes would be competing in a very crowded short-term holiday accommodation market which is largely provided by local residents. The main challenge would therefore be making a shift from personal profit to community benefit. This would be particularly difficult to sustain if those community benefits did not transpire quickly due to lack of funding.

Question 4

What support or incentives could Welsh Government offer to encourage engagement in such a scheme?

NPA Response

7. The Authority does not have the expertise to help with this response.

Welsh Government proposes to:

- *Establish an Estate Agent's Steering Group to explore the potential for creating innovative approaches to local housing sales. The aim would be to develop these in collaboration with all stakeholders, identifying practical steps to support local buyers too gain fair access to local housing.*

Question 5

To what extent do you think the Estate Agent's Steering Group is a practical and effective way of helping estate agents to play their part in protecting Welsh language communities?

NPA Response

8. The primary function of estate agents is to act for clients and to achieve the best outcome (namely price) in the buying and selling of property. They are the valuers of property being entered into the market for sale and their own income is often dependent on achieving the best price. Restricting the market in any way will run counter to this business model. The response to this question will be best answered by direct contact with Estate Agents. Participating local agents will still be competing in an increasingly national, online market and the choice of agent is the seller's prerogative.
9. There is a need to include property vendors when seeking solutions to the issues raised in this consultation paper.

Question 6

How can estate agents be encouraged or incentivized to engage with the Steering Group?

NPA Response

10. This will require discussion with estate agents or perhaps a representative group for estate agents.

Welsh Government proposes to:

- *Explore with relevant stakeholders, developing a voluntary plan which allows local people to have a first chance to buy or rent a property.*

Question 7

Would a short period for local residents to view and make offers on housing help them to access property markets?

NPA Response

- 10 This depends on whether the issue is one of affordability. The offer of a first refusal to a restricted market would not make any difference if the price is beyond their reach.
11. In their response to Welsh Government's consultation on local taxes for second homes and self-catering accommodation, Pembrokeshire County Council detailed that a recent Pembrokeshire Local Housing Market Assessment notes that the size of the private rented housing sector within the National Park has been notably reduced in the last decade which is as a direct result of landlords choosing the lucrative short-term holiday letting over long-term private renting resulting in a shortage of supply of this type of homes and an increase in rent.

Question 8

What else might offer local buyers a 'fair chance' in the housing market?

NPA Response

11. Within the current planning framework securing as much affordable housing as possible is the most effective means of addressing this issue. Statistics on housing completions set out in Future Wales (see chart on page 73) and accompanying text on page 72 detail the decline in the delivery of affordable homes since the mid-1970s. Effective social housing building programmes are needed to deliver the shortfall required to redress this balance. The National Park Authority supports initiatives such as the restriction on 'right to buy' and using increased Council Tax on second homes for the use of buying back former housing stock sold through the 'right to buy' policy. Please also see the Authority's response to the Welsh Government's consultation on Planning Legislation and Policy for Second Homes and Short-Term Holiday Lets. Intervention in the housing market more generally would require a wide range outside the remit of this Authority. Please also see the Authority's LDP background Paper on Principal Residence and/or Local Connections Policy². Further discussion on this issue is contained in the Authority's response to the Welsh Government consultation on planning legislation and policy for

² Pembrokeshire Coast National Park Local Development Plan 2 Background Paper on Principal Residence and/or local Connections Policy
<https://www.pembrokeshirecoast.wales/wp-content/uploads/2019/12/Exam111-HS1-AP10.pdf>

second homes and short-term holiday lets, contained in a separate report to this meeting.

Welsh Government proposes to:

- *Create a network of community based Cultural Ambassadors that promote and celebrate our language, culture and heritage.*

Question 9

How could Cultural ambassadors engage at a community level to support community cohesion and develop a better understanding of our culture, language and heritage?

NPA Response

12. Welsh speaking communities are likely to be acutely aware of their culture, heritage and language. Many of the housing issues in these communities stem from competition for the housing stock being used as tourist accommodation and second homes and the attraction of the culture and heritage is likely to remain an enticing draw to visitors and those choosing to live in these areas.

Welsh Government proposes to:

- *Create a commission on Welsh language communities which will look at the different factors that affect the ability of the language to be sustained as a community language.*

Question 10

What specific factors should the commission consider in relation to sustaining Welsh as community language?

NPA Response

13. Locally-based education, employment and community activity are the most likely ways to contribute to sustaining Welsh language within communities. The benefits of providing a bilingual service within the private sector, as in the public sector, would provide greater opportunities to ensure its day to day usage. It is also important to build on positive elements of Welsh language and culture that benefit all within in a community. For example funding of heritage projects or cultural aspects such as renovation to Scheduled Ancient Monuments and sites of historic interest. This is likely to bring more cohesion and for those moving into an area will help to reinforce local culture and heritage which are linked to the language. The use of bilingual signage is also a very visual expression of the language and the association to Welsh culture and heritage.

Question 11

What, in your view, will be the challenges facing the commission?

NPA Response

14. This will require scoping out.

Welsh Government proposes to:

- *Extend the scope of the Economy and Welsh Language Roundtable to include Housing with a role of overseeing the progress of the Welsh Language Communities Housing Plan.*

15. BLANK

Question 12

Are there any examples, practices or instances of interest that could inform the commission's understanding of the factors that affect the language?

NPA Response

16. It is important to recognise that often non-Welsh speakers moving into an area make important contributions and that many of these will send their children to Welsh language schools. As the children develop their language skills, this often encourages parents to follow suit and become engaged in the language, even if they don't speak it fluently themselves, and so contribute positively to the heritage and culture of the area. Thus investment in Welsh language education is an important factor, at school age and beyond.

Question 13

What (more), alongside housing support can be done to support local and particularly young people to remain live and work in their communities?

NPA Response

17. In addition to the suggestions included in the consultation paper, the covid pandemic has demonstrated the potential for remote and home working which can provide a wider choice of jobs and careers for those choosing to stay in their communities. It also reduces travel and commuting costs. In addition flexible working practices can assist those with other

commitments such as caring for family members allowing them to work whilst living locally to retain their caring roles.

Question 14

Do you have any further comments or suggestions in relation to any of the specific schemes mentioned above?

NPA Response

18. The Authority has no further comment.

Welsh Government proposes to:

- *Explore how local authorities discharge their roles in relation to place names and historic house names.*
- *Consider the recent use of covenants to protect house names and explore how these might be used more widely in the future.*
- *Explore new ways of raising awareness of and promoting the List of Historic Place Names of Wales.*

Question 15

What kind of local interventions would you want to see to promote the importance of Welsh place names, encourage their retention and to maintain language as a visual part of our communities?

NPA Response

19. An attempt was made in 2017 to introduce a bill to protect place names in Wales but was rejected. The bill proposed that people wishing to change historic names would require permission to do so. The National Park Authority considers that this should be revisited.
20. In Pembrokeshire we are fortunate to have an historic place names gazetteer compiled by Dr BG Charles. Awareness-raising of this document, for example through the National Park website could assist with the retention of those historic names.

Question 16

What else should be considered as part of the Welsh Language Communities Housing Plan?

NPA Response

21. The Authority has no further comment to make.

Question 17

What changes would you make to the proposals presented in this plan to improve their effectiveness?

NPA Response

22. Please refer to earlier responses above.

Question 18

We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

NPA Response

23. The Authority has no further comment to make.