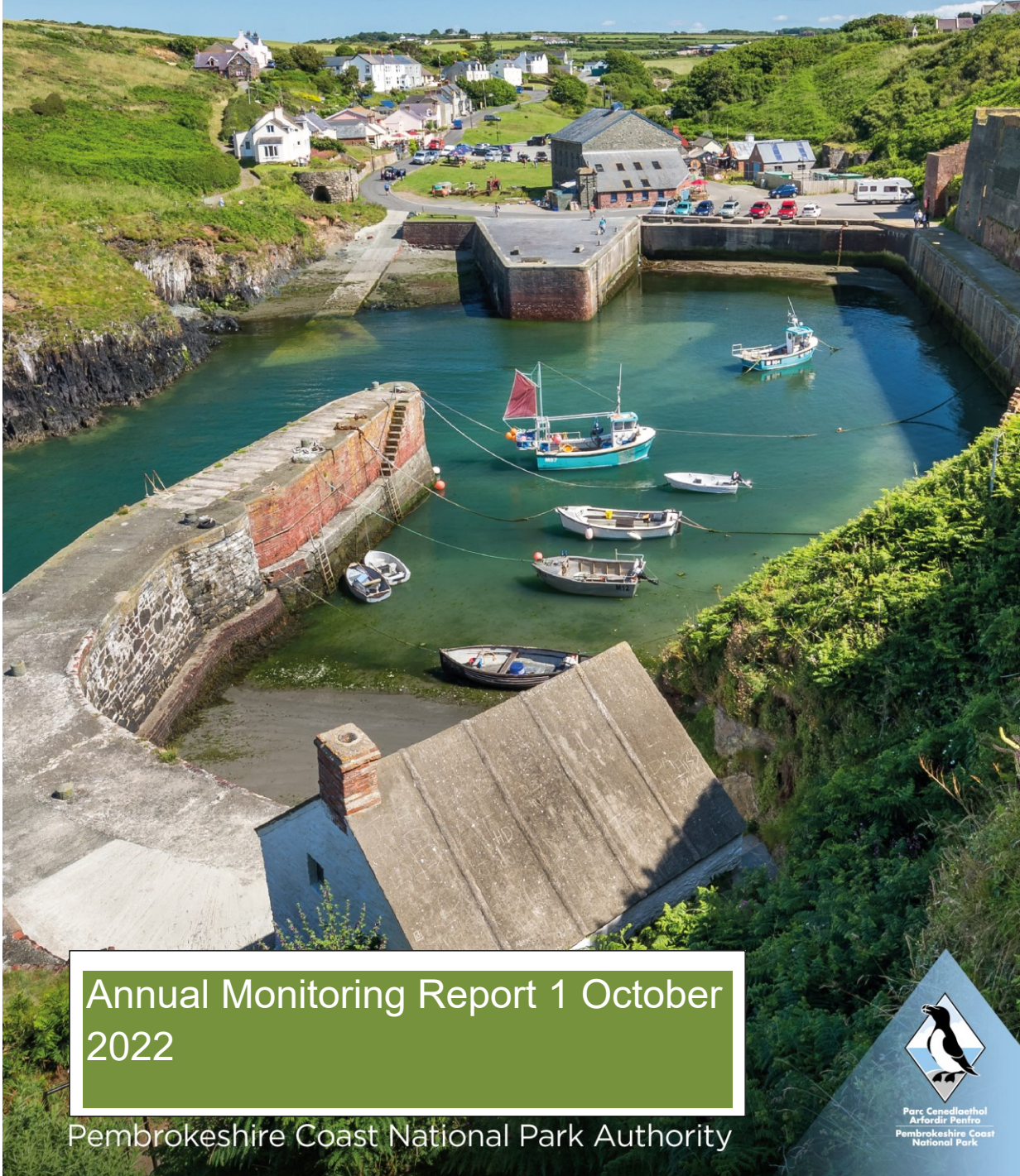


Pembrokeshire Coast National Park
Local Development Plan 2
(end date 2031)



Annual Monitoring Report 1 October
2022

Pembrokeshire Coast National Park Authority



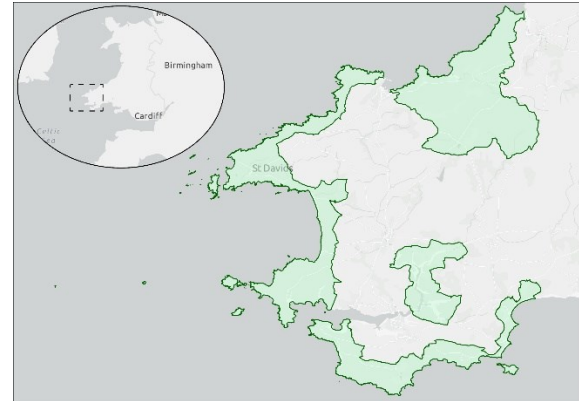
Parc Cenedlaethol
Arfordir Penfro
Pembrokeshire Coast
National Park

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1. INTRODUCTION

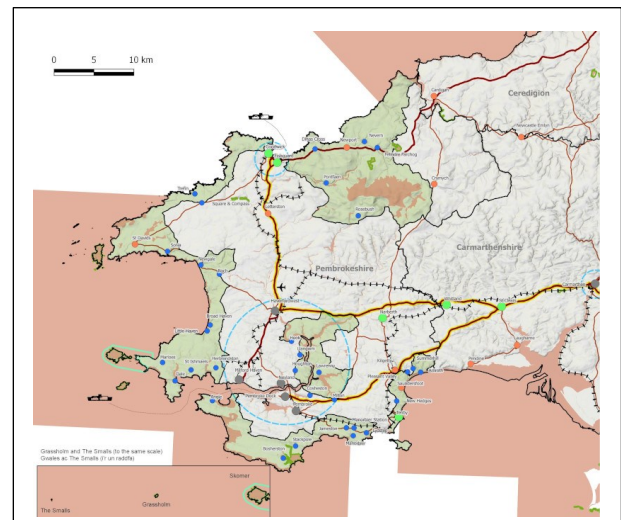
1.1 The Pembrokeshire Coast National Park is situated right out on the west coast of Wales. In addition to being the smallest of the National Parks (at 240 sq mls / 620 sq km), it is also the most densely populated (some 23,000 people live here). It takes the form of a narrow coastal strip (except for the Preseli Hills), some 200 mls / 318 km long, which means that the average width of the National Park is less than 2 km, or just over a mile. This makes it impossible to divorce from its immediate setting.



1.2 In these unique locational circumstances, the National Park Local Development Plan sets out a strategy to continue the strong protection of our National Park as nationally and internationally important assets which are seen as exemplars of sustainable development based on environmental assets.

1.3 This Annual Monitoring Report assesses the effects of the Local Development Plan against those which were anticipated.

1.4 This first report is for the financial year April 2021 to end of March 2022.



2. KEY TRENDS AT A GLANCE

- 2.1 This is the first Annual Monitoring Report for the Pembrokeshire Coast National Park Local Development Plan 2. It covers the first full financial year since Local Development Plan 2 was adopted in September 2020, and covers the financial year from April 2021 to March 2022. It is a statutory requirement for the report to be submitted to the Welsh Government by the 31st October 2022.
- 2.2 The report measures various indicators which assess the performance of the individual policies of Local Development Plan 2.
- 2.3 The key trends for each policy and sustainability objective are shown below and are colour coded as a visual aid to show an overview of the performance of the policies.
- 2.4 The indicators show overall the policies are being implemented effectively and that targets and objectives of Local Development Plan 2 are being achieved.




LDP Indicator No.	Topic	Performance Versus Target
1	Contrary to Recommendation	Continue Monitoring
2	National Park Purposes	Further Investigation/ Research Required A proposal approved contrary to recommendation at Development Management Committee was highlighted as the site was partially within a C2 flood zone and within a coastal risk management area defined in LDP2. It is also contrary to Policy 41 which directs new camping sites to appropriate locations. The proposal was also contrary to Policies 8 and 14 of LDP which protect the National Park and its special qualities. More explanation can be found in Chapter 3.
3	Sustaining Communities	Continue Monitoring
4	Special Qualities	Further Investigation/Research Required – See above for Indicator 2. More explanation can be found in Chapter 3.
5	Welsh Language	Continue Monitoring
6	Landscape Seascape	Continue Monitoring
7	Greenfield	Continue Monitoring
	Open Space	Continue Monitoring
	Green Wedge	Continue Monitoring
8	Major Development	Continue Monitoring
9	Minerals Applications	Continue Monitoring
10	Waste Management	Continue Monitoring
11	Sustainable Design	Continue Monitoring
12	Renewable Energy Heat	Continue Monitoring
13	Renewable Energy Electricity	Continue Monitoring
14	Renewable Guidance	Continue Monitoring
15	Flooding	Further Investigation/Research Required – See above for Indicator 2. More explanation can be found in Chapter 3.
16	Recreation	Continue Monitoring
17	Hotels	Continue Monitoring
18	Self Catering	Continue Monitoring
19	Caravan & Camping	Further Investigation/Research Required – See above for Indicator 2. More explanation can be found in Chapter 3.
20	Employment	Continue Monitoring

LDP Indicator No.	Topic	Performance Versus Target
21	Loss of Employment	Continue Monitoring
22	Indicator withdrawn by WG	
23	Affordable Housing	Continue Monitoring
24	All Housing	Continue Monitoring
25	Viability	Continue Monitoring
26	Gypsy Sites	Continue Monitoring
27	Density	Continue Monitoring
28	Mix of housing	Continue Monitoring
29	Spatial Distribution	Continue Monitoring
30	Tenure of Housing	Continue Monitoring
31	Community Facilities	Continue Monitoring
32	Planning Obligations	Continue Monitoring
33	Retail Hierarchy	Continue Monitoring
34	Vacant Retail Space	Continue Monitoring
35	Transport	Continue Monitoring

Sustainability Appraisal Indicator No.	Topic	Analysis
1	Agriculture & Forestry	Further data is required to make conclusions – latest data included.
2	Travel	Performance remains acceptable
3	Special Qualities	Further Investigation Required: Performance here is of concern as the special qualities are core to the National Park designation. See commentary under Indicator 2 for the policies of the Annual Monitoring Report.
4	Recreation	Performance remains acceptable
5	Visitors at off peak times	Further data is required to make conclusions – latest data included.
6	Adapting to Climate Change	Further Investigation Required: Performance here is of concern as the proposal was approved in a flood zone. See commentary under Indicator 2 for the policies of the Annual Monitoring Report.
7	Factors contributing to climate change	Performance remains acceptable
8	Sustainable Communities	Performance remains acceptable
9	Access to Housing	Performance remains acceptable
10	Cultural Distinctiveness	Performance remains acceptable
11	Minerals	Performance remains acceptable
12	Waste	Performance remains acceptable
13	Community Facilities	Performance remains acceptable
14	Biodiversity enhancement	Performance remains acceptable
15	Water Quality	The strategy of the Plan is not affected by current issues with phosphorous elsewhere in Pembrokeshire.

3. MONITORING INDICATORS

- 3.1 This chapter of the monitoring report will examine how policies in the Local Development Plan are performing in relation to monitoring indicators set out in Chapter 5 of the Plan.
- 3.2 First the key outcomes anticipated are listed, followed by an analysis of any contextual issues of significance. Finally, the policies of the Plan are assessed to the extent to which they are being implemented as intended, and whether objectives are being achieved. As a visual aid in monitoring the effectiveness of policies and to provide an overview of performance, key indicators and outcomes are highlighted using a traffic light system - see below.
- 3.3 Triggers are also included within the policy analysis to ensure that a detailed review is undertaken of the effectiveness of the policy and any external influences when the trigger is met.

Targets / objectives are being achieved.	
Targets have not been achieved or poor performance, but no concerns over implementation of policy / objectives.	
Monitoring indicates area of concern over implementation of policy / objectives.	

- 3.4 Any actions for a review of the policies or Plan as a result of the detailed assessment are set out in the Annual Monitoring Report. Actions can include:

Continue Monitoring	Development plan policies are being implemented effectively.
Training Required	Development plan policies are not being implemented as intended and officer or Member training is required.
Supplementary Planning Guidance (SPG) Required	Development plan policies are not being implemented as intended and further guidance is required, potentially preparing additional SPG.
Further Investigation/Research Required	Development plan policies are not being implemented as intended and further research and/or investigation is required.
Policy Review Required	Development plan policies are not being implemented and are failing to deliver; a review of the specific policy may be required.
Plan Review	Development plan policies are not being implemented and the plan's strategy is not being delivered, triggering a formal review in advance of the statutory 4-year review.

adopted (September 2020). A review has been undertaken of the document to identify any new matters that need to be taken into account.

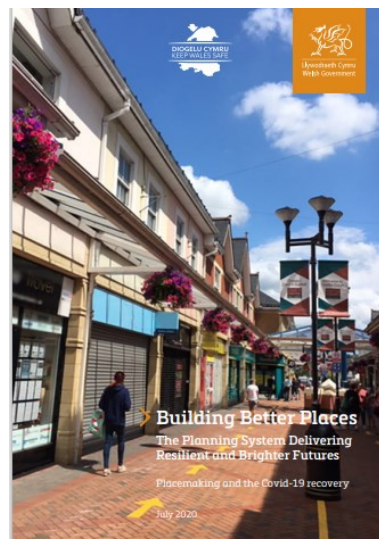
- 3.12 Appendix 4 contains that review. This review has resulted in **no issues of a substantive nature arising** for Local Development Plan 2 which would trigger a review at this stage. Additional issues to take account of in the interim through development management are also highlighted in blue.



Building Better Places The Planning System Delivering Resilient and Brighter Futures (July 2020)³ sets out the Welsh Government's

planning policy priorities to assist in taking action in the recovery period after the Covid-19 pandemic crisis. The document highlights the policy priorities and actions which should be used in the environmental, social, cultural and economic recovery of Wales. The pandemic crisis has highlighted the need for good quality places for people to live, work and relax in. We have also seen the importance of local services and infrastructure with people spending more time locally. The document also highlights that whilst there is undoubtedly a need for economic

recovery, which the planning system should facilitate, this should not be at the expense of quality, both in terms of health and well-being and in response to the climate and nature emergencies.



- 3.13 A review has been undertaken of the document to identify any new matters that need to be taken into account.
- 3.14 Appendix 5 contains that review. This review has resulted in **no issues of a substantive nature arising** for Local Development Plan 2 which would trigger a review at this stage. Additional issues to take account of in the interim through development management are highlighted in blue.

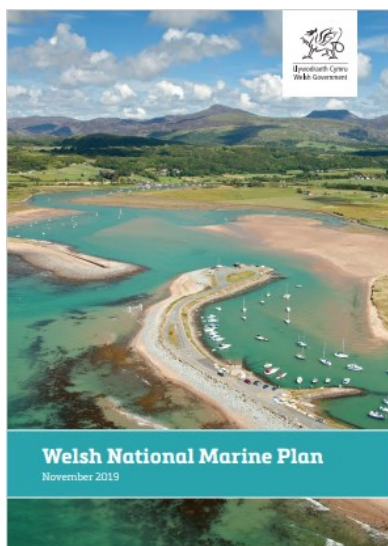
Wales Marine Plan (Nov 2019)⁴

- 3.15 The Welsh National Marine Plan was published in November 2019 and is intended to support the sustainable development of the seas around Wales, covering inshore and offshore areas for the next 20 years. It sets out the Welsh Government's ambitions for the future use of marine natural resources and how various users of the seas should interact and consider each other's activities and future plans.

³ [Building Better Places: The Planning System delivering Resilient and Brighter Futures - placemaking and the Covid-19 recovery \(gov.wales\)](https://gov.wales/sites/default/files/publications/2020-07/building-better-places-the-planning-system-delivering-resilient-and-brighter-futures.pdf) <https://gov.wales/sites/default/files/publications/2020-07/building-better-places-the-planning-system-delivering-resilient-and-brighter-futures.pdf>

⁴ <https://gov.wales/welsh-national-marine-plan-document>

- 3.16 The Marine and Coastal Access Act (2009) requires public authorities to take relevant authorisation or enforcement decisions in accordance with the Welsh National Marine Plan unless relevant considerations indicate otherwise. Public authorities are also required to have regard to the appropriate marine policy documents in making any decision which relates to the exercise of any function capable of affecting the whole or any part of the UK marine area.
- 3.17 Alongside the Plan detailed Implementation Guidance⁵ is provided as well as a 'Considering Marine Plans Terrestrial Infographic'⁶.
- 3.18 Appendix 6 contains an overview of those policies that are most likely to be relevant in the day-to-day decision making of the National Park Authority. This overview has resulted in **no issues of a substantive nature arising** for Local Development Plan 2 which would trigger a review of the Local Development Plan at this stage. Updates the Local Development Plan at review stage are highlighted in blue.




Community Facilities Survey

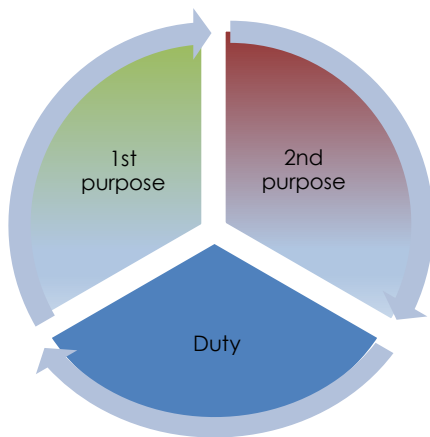
- 3.19 For the review of Local Development Plan 1 a survey of community facilities in settlements was undertaken in 2017. Those with at least 3 facilities normally found in a small village were designated as 'Rural Centres' in LDP2. Policy 54 of the Local Development Plan also protects against unnecessary loss of community facilities and prioritises the re-use of land for employment uses or affordable housing where a loss of the facilities is justified.
- 3.20 In terms of facilities available that qualify Centres as Rural Centres there has been a loss of qualifying facilities in two split Centres outside the Authority's planning jurisdiction. The extent of the settlements in the Authority's jurisdiction is not significant in scale. There will be a need to continue monitoring to appraise at review stage and also to consider the need to comment on the Council's Local Development Plan 2 community facilities policy when the opportunity arises. In terms of the larger Centres the range of facilities required to qualify these Centres as Tier 1 and Tier 2 Centres remain. The main findings are:
- - an increase in the number of primary schools in Tenby
 - - a small reduction in the number of pubs in Tenby and Saundersfoot.

⁵<https://gov.wales/sites/default/files/publications/2020-06/welsh-national-marine-plan-implementation-guidance.pdf>

⁶<https://gov.wales/sites/default/files/publications/2021-01/considering-marine-plans-terrestrial-planning-permission-infographic.pdf>

POLICY PERFORMANCE

INDICATOR 1								
DECISIONS CONTRARY TO RECOMMENDATION								
TARGET IS 0								
TRIGGER: 3% OF PLANNING APPLICATIONS ⁷ DECIDED CONTRARY TO RECOMMENDATION IN ANY ONE YEAR.								
Year	Total Decisions	Contrary	Trigger	Target	Performance	Action	Analysis	Overview
2021 - 2022	363	1	3%	0%	0%	Continue Monitoring	Performance remains below the Trigger point.	




Purpose 1: To conserve and enhance the natural beauty, wildlife and cultural heritage of the area.


Purpose 2: To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.

Duty: To seek to foster the social and economic wellbeing of the local communities within the National Park in pursuit of our purposes.

Developments which engage the Sandford Principle – where conflict between the two National Park purposes becomes irreconcilable, the first one must prevail. Carrying out the socio-economic duty in National Parks must be in pursuance of the purposes.

⁷ Full, outline or reserved matters applications.

INDICATOR 2 (OVERARCHING)						
POLICY 1 DECISIONS CONTRARY TO SANDFORD PRINCIPLE OR WHICH RESULT IN CONFLICTS BETWEEN THE DUTY AND PURPOSES.						
TARGET IS 0						
TRIGGER: 0 APPLICATIONS APPROVED CONTRARY TO THE SANDFORD PRINCIPLE IN ANY ONE YEAR.						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	1	0	1	Further Investigation/ Research Required	Extract from Officer Report: <i>There is a fundamental policy objection to development in this location which is partially within a C2 flood zone and within a coastal risk management area defined in LDP2. It is also contrary to Policy 41 which directs new camping sites to appropriate locations and to Policies 8 and 14 of LDP which protect the National Park and its special qualities.</i> ⁸	

INDICATOR 3						
DECISIONS CONTRARY TO POLICY 7, POLICY 43, POLICY 44, POLICY 48, POLICY 54 – PRIORITISE COMMUNITY USES.						
TARGET IS 0						
TRIGGER: APPROVAL OF 2 PLANNING APPLICATIONS CONTRARY TO A POLICY IN ANY ONE YEAR.						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	2	0	0	Continue Monitoring	Performance remains below the Trigger point.	



*Skrinkle Community Hub
under construction August
2022*

⁸ For further information see Officer Reports [NP_21_0149.pdf \(pembrokeshirecoast.wales\)](#) [NP_21_0149_FUL.pdf \(pembrokeshirecoast.wales\)](#) and Development Management Committee minutes [DEVELOPMENT MANAGEMENT COMMITTEE \(pembrokeshirecoast.wales\)](#) (item 6 (f)) [DEVELOPMENT MANAGEMENT COMMITTEE \(pembrokeshirecoast.wales\)](#) (item 6 (a))

SPECIAL QUALITIES

KEY OUTCOMES

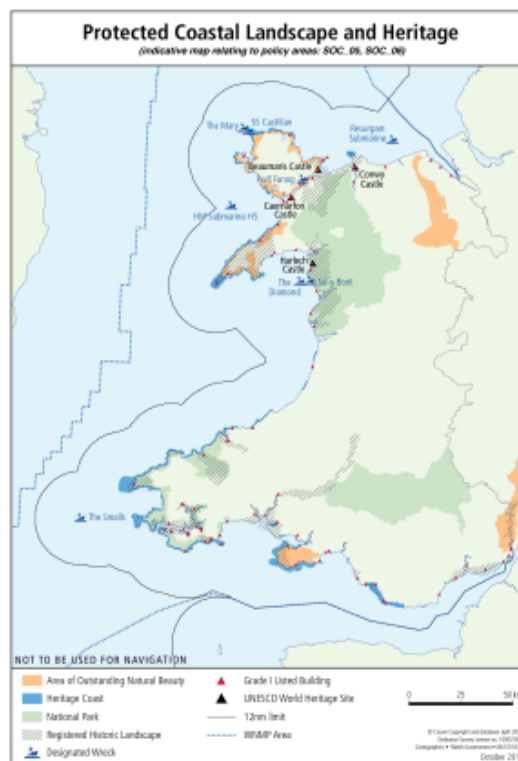
- (1) The special qualities of the National Park have been conserved and enhanced.

CONTEXT

3.21 **Future Wales: the National Plan 2040⁹** was published after Local Development Plan 2 was adopted. It advises 'National Park Authorities are unique planning entities with a specific remit to reflect the distinctive characteristics of their areas. National Parks are at the heart of resilient ecological networks and have a key role to play in Strategic Development Plans as part of the sustainable management of natural resources, protecting Wales's cultural heritage and promoting health and well-being. **Future Wales policies respect the functions of National Parks in terms of their statutory purposes. At the regional scale, where National Park Authorities will be considered in the context of a wider spatial region, their statutory duty must inform Strategic Development Plans.** Planning Policy Wales sets out the wider planning policy context for National Parks.

3.22 **Planning Policy Wales Edition 11 February 2021** adds a paragraph regarding National Parks: 6.3.11 National Park Authorities will be involved in the preparation of Strategic Development Plans. The Strategic Development Plan areas will be the area of the Corporate Joint Committee and include all or part of any National Park Authority within the Corporate Joint Committee area. National Park Authorities are members of Corporate Joint Committees for strategic development planning purposes. **Membership of a Corporate Joint Committee does not affect the statutory purposes of National Parks.**

3.23 **Wales Marine Plan (Nov 2019)**¹⁰ Paragraph 127. Designated Landscapes are acknowledged at an international level by the International Union for Conservation of Nature (IUCN) as Category V Protected Areas, valued as living landscapes for their interaction between natural and human elements. Five of the



For full map see page 35
[Welsh National Marine Plan \(gov.wales\)](https://gov.wales/welsh-national-marine-plan-document)

⁹ <https://planningaidwales.org.uk/future-wales-the-national-plan-2040/>

¹⁰ <https://gov.wales/welsh-national-marine-plan-document>

eight Welsh Designated Landscapes were designated on account of their spectacular coastal scenery and coastal character. In **Pembrokeshire, Wales has the UK's only fully coastal National Park**. Some 54% of the Welsh coast is designated as either a National Park or AONB.

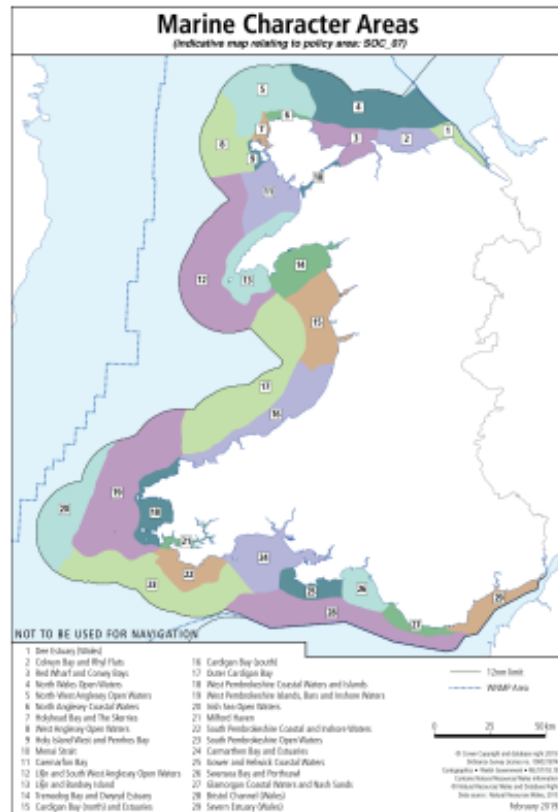
SOC_06: Designated landscapes

Proposals should demonstrate how potential impacts on the purposes and special qualities for which National Parks or Areas of Outstanding Natural Beauty have been designated have been taken into consideration and should, in order of preference:

- a. avoid adverse impacts on designated landscapes; and/or
- b. minimise impacts where they cannot be avoided; and/or
- c. mitigate impacts where they cannot be minimised.

If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding.

Opportunities to enhance designated landscapes are encouraged.



For full map see page 37 [Welsh National Marine Plan \(gov.wales\)](#)

SOC_07: Seascapes

Proposals should demonstrate how potential impacts on seascapes have been taken into consideration and should, in order of preference:

- a. avoid adverse impacts on seascapes; and/or
- b. minimise impacts where they cannot be avoided; and/or
- c. mitigate impacts where they cannot be minimised.


If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding.

Opportunities to enhance seascapes are encouraged.


POLICY PERFORMANCE

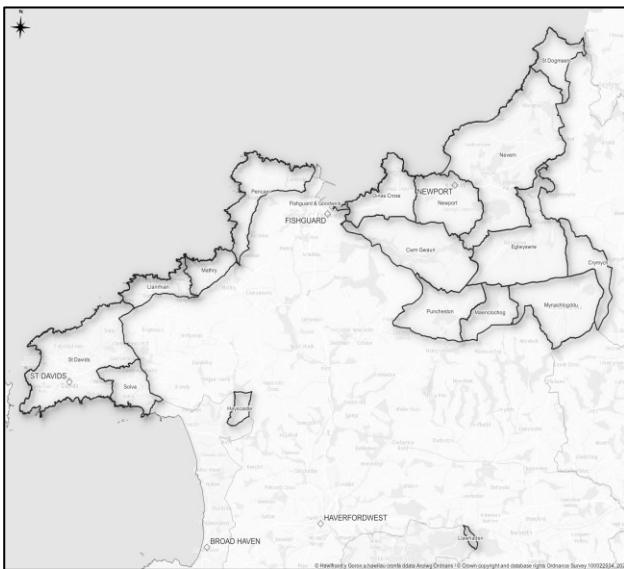
Special Qualities	
Coastal Splendor	Richness of habitats and biodiversity
Diverse Geology	Islands
Diversity of Landscape	Accessibility
Distinctive settlement character	Space to breathe
Rich historic environment	Remoteness, tranquility and wildness
Cultural heritage	The diversity of experiences and combination of individual qualities

INDICATOR 4**DECISIONS CONTRARY TO POLICY 8****TARGET IS 0****TRIGGER: APPROVAL OF 2 PLANNING APPLICATIONS CONTRARY TO ANY CRITERION IN ANY ONE YEAR.**


Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	2	0	1	Further Investigation/ Research Required	The application was recommended for refusal as it was contrary to Policy 8 by causing harm to the Special Qualities of the National Park's landscape. Members approved the application contrary to recommendation having considered all relevant planning policies and other material planning considerations. The target of 0 was not achieved. The trigger of 2 approvals contrary to recommendation has not been breached. ¹¹	

¹¹ For further information see Officer Reports [NP_21_0149.pdf \(pembrokeshirecoast.wales\)](#) [NP_21_0149_FUL.pdf \(pembrokeshirecoast.wales\)](#) and Development Management Committee minutes [DEVELOPMENT MANAGEMENT COMMITTEE \(pembrokeshirecoast.wales\)](#) (item 6 (f)) [DEVELOPMENT MANAGEMENT COMMITTEE \(pembrokeshirecoast.wales\)](#) (item 6 (a))

INDICATOR 5						
DECISIONS CONTRARY TO POLICY 13 WELSH LANGUAGE						
TARGET IS 0						
TRIGGER: APPROVAL OF 2 PLANNING APPLICATIONS CONTRARY TO THE POLICY IN ANY ONE YEAR.						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	2	0	0	Continue Monitoring	Performance remains below the Trigger point	



Welsh Language Sensitive Areas


INDICATOR 6						
DECISIONS CONTRARY TO POLICY 14 LANDSCAPE & SEASCAPE						
TARGET IS 0						
TRIGGER: APPROVAL OF 2 PLANNING APPLICATIONS CONTRARY TO THE POLICY WITH ITS SUPPORTING GUIDANCE IN ANY ONE YEAR.						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	2	0	1	Further Investigation/ Research Required	The application was recommended for refusal as it was contrary to Policy 14 by introducing a use incompatible with location, failing to harmonise with or enhance the landscape and result in development of the undeveloped coast. Members approved the application contrary to recommendation having considered all relevant planning policies and other material planning considerations. The target of 0 was not achieved. The trigger of 2 approvals contrary to recommendation has not been breached. ¹²	


INDICATOR 7
DECISIONS CONTRARY TO POLICY 15 OR POLICY 16
TARGET IS 0 % LOSS OF GREENFIELD ¹³ , OPEN SPACE ¹⁴ , GREEN WEDGE
TRIGGER: APPROVAL OF 1 PLANNING APPLICATIONS CONTRARY TO RECOMMENDATION IN ANY ONE YEAR.


¹² For further information see Officer Reports [NP_21_0149.pdf \(pembrokeshirecoast.wales\)](#) [NP_21_0149_FUL.pdf \(pembrokeshirecoast.wales\)](#) and Development Management Committee minutes [DEVELOPMENT MANAGEMENT COMMITTEE \(pembrokeshirecoast.wales\)](#) (item 6 (f)) [DEVELOPMENT MANAGEMENT COMMITTEE \(pembrokeshirecoast.wales\)](#) (item 6 (a))

¹³ Except for land released in accordance with the Plan's policies.

¹⁴ Except where they can be retained, enhanced or alternative provision can be made.

INDICATOR 7 GREENFIELD						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	1	0	0	Continue Monitoring	Performance remains below the Trigger point	

INDICATOR 7 OPEN SPACE						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	1	0	0	Continue Monitoring	Performance remains below the Trigger point	

INDICATOR 7 GREEN WEDGE						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	1	0	0	Continue Monitoring	Performance remains below the Trigger point	

MAJOR DEVELOPMENT, THE POTENTIAL FOR GROWTH

KEY OUTCOMES

- (4) No new major development in the National Park unless there are exceptional circumstances.
- (5) The provision of waste facilities which predominantly serve the National Park area.

CONTEXT


- 3.24 **Minerals:** The annual monitoring of reserves and the 2nd review of the Regional Technical Statement for the North Wales and South Wales Regional Aggregate Working Parties will continue to inform planning decisions on a regional and national basis. The 2nd review was endorsed by Welsh Government in December 2020 and noted by Pembrokeshire Coast National Park Authority Members. The purpose of the RTS is to ensure that an adequate and steady supply of aggregates can be maintained throughout Wales (and beyond, in the case of materials that are exported) taking into account the key objectives of sustainable supply of minerals set out in Minerals Technical Advice Note 1. Pembrokeshire Coast National Park Authority continues to work with neighbouring authorities on a Statement of Sub-Regional Collaboration for the West Wales sub-region for sand and gravel.
- 3.25 **Waste:** The first report for the new region of Mid and South West Wales Waste Planning Monitoring Report covers the period 2021-22. Information on the region's waste management / resources recovery facilities is required in order to monitor implementation of 'Towards Zero Waste: One Wales One Planet (TZW, 2010) – The Overarching Waste Strategy Document for Wales'. The report was submitted to Welsh Government in March 2022. It is yet to be published, but highlights the following key findings:
- Overall, the region is meeting targets in respect of reducing local authority collected waste, increasing recycling and composting and reducing landfilled biodegradable municipal waste, reusing, recovering and recycling industrial and commercial waste and construction and demolition waste and reducing the amounts of hazardous waste landfilled.
 - There is insufficient capacity in 'other recovery'¹⁵ facilities in the region. The economic case for creating further capacity within the region is weakened by existing contracts and the subsequent lack of sufficient waste available.
 - There is a similar case for food waste in the region following recent developments such as Severn Trent's Stormy Down facility which takes waste


¹⁵ Other recovery can include incineration, pyrolysis, gasification, anaerobic digestion, energy from waste and landspreading of compost like output.

from most of the authorities in the Mid and South West Wales region to some degree. However, it must be noted that with the change in regional structure, the Stormy Down facility is now located outside the Mid and South west Wales area.

- The predicted remaining landfill capacity for the region is 7.5 years, which is above the 7 year landfill void trigger set out in Technical Advice Note 21: Waste. However, this figure is dependent on several assumptions and as such continuous monitoring is required.
- Following the introduction of the new household recycling and waste collection service in November 2019, Pembrokeshire is now Wales' top recycler.


POLICY PERFORMANCE

INDICATOR 8						
APPROVAL OF MAJOR DEVELOPMENT ¹⁶ UNLESS EXCEPTIONAL CIRCUMSTANCES PROVEN						
TARGET IS 0						
TRIGGER: APPROVAL OF 1 PROPOSAL WHERE NO EXCEPTIONAL CIRCUMSTANCES SHOWN						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	1	0	0	Continue Monitoring	Performance remains below the Trigger point.	

INDICATOR 9						
APPROVAL OF MINERALS DEVELOPMENT ¹⁷ UNLESS EXCEPTIONAL CIRCUMSTANCES PROVEN						
TARGET IS 0						
TRIGGER: APPROVAL OF 1 PROPOSAL WHERE NO EXCEPTIONAL CIRCUMSTANCES SHOWN						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	1	0	0	Continue Monitoring	Performance remains below the Trigger point.	

¹⁶ What constitutes 'major development' and 'exceptional circumstances' in National Parks is defined in Planning Policy Wales.

¹⁷ What constitutes 'exceptional circumstances' in National Parks is defined in Planning Policy Wales.

INDICATOR 10						
DECISIONS CONTRARY TO POLICY 27, 28 WASTE MANAGEMENT FACILITIES						
TARGET IS 0						
TRIGGER: APPROVAL OF 2 PLANNING APPLICATIONS CONTRARY TO THE POLICIES						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	2	0	0	Continue Monitoring	Performance remains below the Trigger point.	

CLIMATE CHANGE, SUSTAINABLE DESIGN, FLOODING, SUSTAINABLE ENERGY

KEY OUTCOMES

- (6) Development achieving high standards in terms of sustainable design. With all new dwellings meeting the standards set out in national planning policy.
- (7) The National Park contributing to renewable energy generation.
- (8) No highly vulnerable development in areas at risk of flooding both now and in the long term and with no negative impacts elsewhere.


CONTEXT


- 3.26 **Flooding:** Welsh Government made available an updated Technical Advice Note 15 on flooding in September 2021 which also incorporates coastal erosion. The intention was for it to come into effect at the beginning of December 2021. The policy guidance contained in the Technical Advice Note is much stricter in terms of not permitting highly vulnerable development (houses, schools, hospitals etc.) in areas of risk from flooding or erosion. The Technical Advice Note also takes into account climate change to forecast future flood risks and requires higher thresholds for flood defences. In addition the Development Advice Maps will be replaced with new Flood Maps for Planning, developed and published by Natural Resources Wales.
- 3.27 In response to concerns raised by Local Planning Authorities, Julie James, Minister for Climate Change, wrote to all local planning authorities in November 2021 announcing **a postponement in the coming into force of the revised Technical Advice Note until 1st June 2023** to allow full consideration of the impact of the new guidance. In the meantime, the existing Technical Advice Note and Development Advice Map remains as the framework for assessing flood risk.
- 3.28 **The Minister's letter also required every local planning authority complete (or review) a strategic flood consequence assessment for their area, individually or on a regional basis.** In response, the National Park Authority has joined with other planning authorities in south-west Wales to commission consultants to undertake a Regional Strategic Flood Consequence Assessment for the region the publication of which is due (October 2022). Separately, Carmarthenshire County Council and Pembrokeshire County Council have also commissioned consultants to carry out some more detailed local work on the same topic in conjunction with the emerging the emerging Development Plans of each authority. This work is at an earlier stage.
- 3.29 **Welsh Development Quality Requirements 2021¹⁸.** This standard will be applied in full to all publicly funded affordable housing schemes submitted to Welsh Government at "concept" stage for technical scrutiny from 01 October 2021. New affordable homes delivered through planning agreements (under section 106 of the Town and Country Planning Act 1990) and planning conditions will only be required to meet the Appendix A and Appendix B "space

¹⁸ <https://gov.wales/sites/default/files/publications/2021-08/development-quality-requirements-for-housing-associations.pdf>


requirements” for agreements entered into after 01 October 2021. We will keep this under regular review.’


POLICY PERFORMANCE

INDICATOR 11						
DECISIONS CONTRARY TO POLICY 29 ‘SUSTAINABLE DESIGN’ CRITERION C), E), G), H) OR I).						
TARGET IS 0						
TRIGGER: APPROVAL OF 3 PLANNING APPLICATIONS CONTRARY TO ANY ONE OF THE POLICY’S CRITERIA						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	3	0	0	Continue Monitoring	Performance remains below the Trigger point.	


INDICATOR 12					
RENEWABLE ENERGY CAPACITY OF RENEWABLE ENERGY SCHEMES PERMITTED AND COMPLETED.					
TARGET IS 9.8GWH FOR RENEWABLE HEAT ¹⁹					
Year	Target	Performance	Action	Analysis	Overview
2021-2022	Planning Permissions to contribute to an overall renewable Heat Target for the National Park of 9.8 GWh.	0.46 GWh from 5 permissions granted since 2016 (base date of Renewable Energy Assessment Update)	Continue Monitoring	There has been a small increase in capacity as a result of relatively small scale, domestic installations permitted. Renewable Energy from micro household renewable schemes and small scale nondomestic schemes generally benefit from Permitted Development Rights and therefore are not included in the overall Heat generation capacity.	

¹⁹ This target is aspirational, dependent upon a range of factors in the future such as government changes in policy, funding opportunities/constraints, as well as other external factors.

INDICATOR 13						
RENEWABLE ENERGY CAPACITY OF RENEWABLE ENERGY SCHEMES PERMITTED AND COMPLETED.						
TARGET IS 38.9GWH FOR RENEWABLE ELECTRICITY ²⁰						
Year	Target	Performance	Action	Analysis	Overview	
2021-2022	Planning Permissions to contribute to an overall Renewable Electricity Target for the National Park of 38.9 GWh.	0.035 GWh from 9 permissions granted since 2016 (base date of the Renewable Energy Assessment Update)	Continue Monitoring	There has been a small increase in capacity as a result of relatively small scale, domestic installations permitted. Renewable Energy from micro household renewable schemes and small scale non domestic schemes generally benefit from Permitted Development Rights and therefore are not included in the overall Electricity generation capacity.		

INDICATOR 14						
DECISION MAKING IS CONSISTENT WITH THE AUTHORITY'S RENEWABLE ENERGY POLICY AS SUPPORTED BY THE RENEWABLE ENERGY SUPPLEMENTARY PLANNING GUIDANCE AND CUMULATIVE IMPACT OF WIND TURBINES ON LANDSCAPE AND VISUAL AMENITY SUPPLEMENTARY PLANNING GUIDANCE						
TARGET IS 0 APPROVALS CONTRARY						
TRIGGER: 3 OR MORE DECISIONS CONTRARY TO POLICY 33 RENEWABLE ENERGY IN CONJUNCTION WITH ITS SUPPORTING SUPPLEMENTARY PLANNING GUIDANCE						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	3	0	0	Continue Monitoring	Performance remains below the Trigger point.	

²⁰ This target is aspirational, dependent upon a range of factors in the future such as government changes in policy, funding opportunities/constraints, as well as other external factors.

INDICATOR 15						
FLOODING: AMOUNT OF DEVELOPMENT (BY TAN 15 PARAGRAPH 5.1 DEVELOPMENT CATEGORY) PERMITTED IN C1 AND C2 FLOODPLAIN AREAS NOT MEETING ALL TAN 15 TESTS (PARAGRAPH 6.2 I-V)						
TARGET IS DEVELOPMENT IS NOT PERMITTED WHERE THE LONG TERM SCENARIO (IN THE NEXT 100 YEARS) WOULD FAIL THE TESTS SET OUT ACROSS.						
TRIGGER: 1 DEVELOPMENT PERMITTED CONTRARY TO POLICY 34						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	1	0	1	Further Investigation / Research Required	See below for analysis ²¹	

Analysis:

The application was recommended for refusal as it was partially within a C2 flood zone and within a coastal risk management area. Members approved the application contrary to recommendation having considered all relevant planning policies and other material planning considerations. The target of 0 was not achieved. The trigger of 1 approval contrary to recommendation has been breached.

²¹ For further information see Officer Reports [NP_21_0149.pdf \(pembrokeshirecoast.wales\)](#) [NP_21_0149_FUL.pdf \(pembrokeshirecoast.wales\)](#) and Development Management Committee minutes [DEVELOPMENT MANAGEMENT COMMITTEE \(pembrokeshirecoast.wales\)](#) (item 6 (f)) [DEVELOPMENT MANAGEMENT COMMITTEE \(pembrokeshirecoast.wales\)](#) (item 6 (a))

VISITOR ECONOMY, EMPLOYMENT AND RURAL DIVERSIFICATION

KEY OUTCOMES

- (9) The National Park contributes to the provision of new employment and existing sites are safeguarded.
- (10) A range of holiday accommodation is available to meet the varying needs of visitors
- (11) Recreational and visitor activities do not damage the special qualities of the National Park

CONTEXT

3.30 **Welsh Government and policy for second homes and short-term holiday lets**²²:

The National Park Authority continues to engage with Welsh Government and local stakeholders such as Pembrokeshire County Council on Welsh Government initiatives. In summary the Authority:

- a. Would support legislation to make a change to the definition of development to underpin the Use Class Order proposed changes.
- b. Would support the need for more Welsh Government research to be done to assist planning authorities in understanding the evidence thresholds required to pursue different planning policy approaches.

3.31 **Welsh Government**²³ announced on the 4th of July 2022 a package of measures including:

- *Changes to planning regulations by the end of the summer. These will introduce three new planning use classes – a primary home, a second home and short-term holiday accommodation. Local planning authorities, where they have evidence, will be able to make amendments to the planning system to require planning permission for change of use from one class to another. We will also introduce changes to national planning policy to give local authorities the ability to control the number of second homes and holiday lets in any community.*
- *Plans to introduce a statutory licensing scheme for all visitor accommodation, including short-term holiday lets, making it a requirement to obtain a license. This will help raise standards across the tourism industry.*
- *Following a consultation about varying land transaction tax locally in areas with large numbers of second homes, work will start today (Monday 4 July) with local authorities to develop a national framework so they can request increased land transaction tax rates for second homes and holiday lets to be applied in their local area.*

3.32 The Welsh Government has also announced the potential to increase to the maximum level of **council tax premiums for second homes, alongside a new local tax rules for holiday lets** on the 1st March 2022. The maximum level at which local authorities can set council tax premiums on second homes and long-term empty properties will be increased to 300%, which will be effective from April 2023. The criteria for **self-catering accommodation being liable for business rates** instead of council tax will also change from April 2023. Currently, properties that are available to let for at least 140 days, and that are actually let for at least 70 days, will pay rates rather than council tax. The change will increase these thresholds to being

²² [Planning legislation and policy for second homes and short-term holiday lets | GOV.WALES](#)

²³ <https://gov.wales/new-package-measures-address-high-numbers-second-homes#:~:text=The%20Welsh%20Government%20has%20already.fair%20contribution%20to%20their%20local>

available to let for at least 252 days and actually let for at least 182 days in any 12-month period.²⁴

- 3.33 Officers are working with colleagues in the County Council to understand and respond to the implications of these changes for Pembrokeshire.
- 3.34 **Camping and Caravanning developments:** Adoption of Local Development Plan 2 brought a change of policy for camping and caravanning developments. Local Development Plan 1 continued a long-standing policy of restraint for further caravan and camping sites due to the significant number already within the National Park. Whilst operating the LDP1 policy, issues emerged with Certificated camping sites and 28-day sites, both outside planning control. An increasing number of sites were appearing in the National Park through these means, with Certification being a regular default for landowners refused planning permission or given pre-planning advice that a site would be contrary to policy. The prolific number of 28-day sites also overwhelmed the Authority's ability to monitor activity and the protracted enforcement process is not effective in dealing with those sites operating beyond the 28 days. As a result, the Authority was receiving an increasing number of Certificate of Lawfulness applications for large camping and caravan sites.
- 3.35 As part of the evidence base for Local Development Plan 2, in 2015 a study was undertaken to explore the potential for the National Park landscape to safely absorb additional camping and caravan development without harming its special qualities. The study informed the changes to the policy for Local Development Plan 2 and has also been published as Supplementary Planning Guidance. The Local Development Plan 2 policy for camping and caravanning development can be summarised as allowing for limited new development in appropriate locations – generally small sites away from the coast and Preseli Hills.
- 3.36 The outcome of relaxing the policy position on new sites needs to be monitored. Adoption of LDP2 has coincided with the Covid pandemic which has resulted in significant changes to the visitor economy in Pembrokeshire and a dramatic increase in the number of visitors using camping and caravanning accommodation. This has continued the demand for additional sites – largely through the Certification process, but also in terms of 'fly-camping' with favoured locations being the coast, beaches, laybys, rural car parks and viewpoints.
- 3.37 During the current monitoring period one new site and one alteration to an existing site has gained planning approval.
- 3.38 The Authority will continue to work with other organisations and authorities to protect the National Park for harmful and unauthorised development and raise awareness of the need for changes to the camping and caravanning legislation that will meet present day requirements with Welsh Government.
- 3.39 **Welsh Government Consultation on Permitted Development:** Following the temporary changes to permitted development during the Covid Pandemic, the Welsh Government published a consultation document in November 2021 on whether any or all of the changes should be made permanent. **One of the changes proposed related to extending the current 28-day permitted development for land to be used as a camping site to 56 days.** The Authority responded that the change should not be applied within the National Park as they are unregulated and impact on the landscape and special qualities. In addition, such sites are in competition with established businesses that also require support in recovering from the Covid crisis. The number of unregulated sites has been increasing steadily within the National Park, even prior to 2020. The increase has become greater since 2020, resulting in a multi-agency response locally to deal with the consequences of camping which are affecting local

²⁴ [New tax rules for second homes | GOV.WALES](#)

communities, ecology and the landscape. More stringent measures are currently being considered by the Authority and partners.


POLICY PERFORMANCE

INDICATOR 16

DECISIONS RELATING TO RECREATIONAL ACTIVITIES CONTRARY TO POLICY 38

TARGET IS 0

TRIGGER: APPROVAL OF 2 PLANNING APPLICATIONS CONTRARY TO THE POLICY IN CONJUNCTION WITH THE RECREATIONAL ACTIVITIES SUPPLEMENTARY PLANNING GUIDANCE


Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	2	0	0	Continue Monitoring	Performance remains below the Trigger point.	

INDICATOR 17

DECISIONS ON LOSS OF HOTELS – POLICY 39

TARGET IS 0

TRIGGER: APPROVAL OF 1 PLANNING APPLICATION CONTRARY TO THE POLICY


Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	1	0	0	Continue Monitoring	Performance remains below the Trigger point.	


INDICATOR 18


PRIORITISING AFFORDABLE HOUSING DELIVERY OVER SELF CATERING – POLICY 40

TARGET IS 0


TRIGGER: APPROVAL OF 2 APPLICATIONS CONTRARY TO POLICY 40 IN ANY ONE YEAR

Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	2	0	0	Continue Monitoring	Performance remains below the Trigger point.	

INDICATOR 19						
CARAVAN AND CAMPING – POLICY 41						
TARGET IS 0						
TRIGGER: APPROVAL OF 2 OR MORE DEVELOPMENTS CONTRARY TO POLICY 41 WITH ITS SUPPORTING SUPPLEMENTARY PLANNING GUIDANCE						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	2	0	1	Further Investigation / Research Required	See below for analysis. ²⁵	
<p>Analysis:</p> <p>The application was recommended for refusal as it was contrary to Policy 41 which directs new camping sites to appropriate locations. Members approved the application contrary to recommendation having considered all relevant planning policies and other material planning considerations. The target of 0 was not achieved. The trigger of 2 approvals contrary to recommendation has not been breached.</p>						

INDICATOR 20						
EMPLOYMENT - POLICY 43						
TARGET IS 0						
TRIGGER: APPROVAL OF 1 OR MORE PLANNING APPLICATIONS CONTRARY TO THE POLICY						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	2	0	0	Continue Monitoring	Performance remains below the Trigger point.	

²⁵ For further information see Officer Reports [NP_21_0149.pdf \(pembrokeshirecoast.wales\)](#) [NP_21_0149_FUL.pdf \(pembrokeshirecoast.wales\)](#) and Development Management Committee minutes [DEVELOPMENT MANAGEMENT COMMITTEE \(pembrokeshirecoast.wales\)](#) (item 6 (f)) [DEVELOPMENT MANAGEMENT COMMITTEE \(pembrokeshirecoast.wales\)](#) (item 6 (a))

INDICATOR 21						
EMPLOYMENT - POLICY 44						
TARGET IS 0						
TRIGGER: LOSS OF TWO OR MORE EMPLOYMENT SITES OR 500 SQ. METRES CONTRARY TO RECOMMENDATION						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	2	0	0	Continue Monitoring	Performance remains below the Trigger point.	

2E AFFORDABLE HOUSING AND HOUSING GROWTH

KEY OUTCOMES

- (12) An estimated 960 new dwellings are delivered of which an estimated 362 are affordable.
- (13) A higher density of development is achieved – a minimum of 30 dwellings to the hectare.

CONTEXT

- 3.40 **Housing Market:** The nature of the housing market over the lifespan of the Local Development Plan is and will be the subject of much conjecture and conflicting forecasts. The link below provides detailed commentary on housing starts and completions in Wales recently.²⁶
- 3.41 **Welsh Government and policy for second homes and short-term holiday lets:** The National Park Authority continues to engage with Welsh Government local stakeholders such as Pembrokeshire County Council on Welsh Government initiatives. More commentary is provided under the Sustainability Objectives chapter.
- 3.42 **Local Housing Market Assessment July 2021:** The Authority is party to a County wide housing market assessment which was finalised in the July 21.²⁷ The study identifies housing needs both within and outside the National Park in Pembrokeshire – Table 5.18 which sets out the need for this National Park is copied below.

²⁶ <https://gov.wales/new-house-building> copy and paste into the web browser

²⁷ Local Housing Market Assessment July 2021 <https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base>

Table 5.18 Profile of new accommodation required in the National Park part of Pembrokeshire

<i>Size of home</i>	<i>Owner occupied</i>	<i>Private rented</i>	<i>Homebuy/HWR</i>	<i>Shared Ownership/HTB</i>	<i>Social Rented</i>
1 bedroom	22	12	4	3	30
2 bedroom	101	22	9	14	64
3 bedroom	189	27	18	19	56
4+ bedrooms	69	3	8	8	12
Total	381	65	39	44	162
<i>Size of home</i>	<i>Owner occupied</i>	<i>Private rented</i>	<i>Homebuy/HWR</i>	<i>Shared Ownership/HTB</i>	<i>Social Rented</i>
1 bedroom	3.2%	1.8%	0.6%	0.4%	4.4%
2 bedroom	14.6%	3.2%	1.3%	2.0%	9.2%
3 bedroom	27.4%	3.9%	2.6%	2.8%	8.1%
4+ bedrooms	10.0%	0.4%	1.2%	1.1%	1.8%
Total	55.2%	9.4%	5.6%	6.4%	23.5%

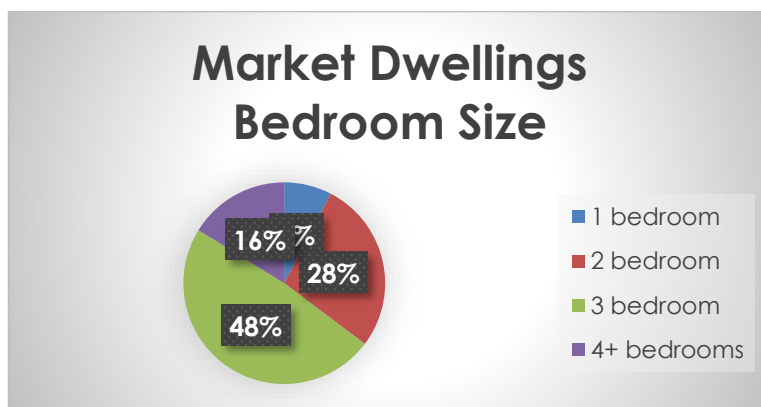
- 3.43 The overall findings of the Local Housing Market Assessment need to be considered alongside the targets set in the Local Development Plan 2. **Policy 48 Affordable Housing** identifies a target of delivery 362 affordable houses over the Plan period 2015 to 2031.
- 3.44 The Pembrokeshire Local Housing Market Assessment July 2021 identifies an affordable housing need of 245 (39 Homebuy, 44 Shared Ownership, 162 Social Rented) over the period 2020 to 2033 (this will exclude sites that are planned for completion in the period 2020 to 2025²⁸). The table below provides an opportunity to compare across a common period to check consistency in requirements. The table below shows the expectations of the Authority for affordable housing provision in Local Development Plan 2 are less than the need identified in the Local Housing Market Assessment – see highlighted totals for the last two columns. This means that every opportunity to secure affordable housing provision should be sought as Local Development Plan 2 is implemented.

April	March	LHMA 2020 to 2033 per annum distribution	LHMA est of forecast completions 2020 to 2025	LHMA Total Estimated Provision 2020 to 2033	LDP 2 Target/ Forecast 2015 to 2031	LDP 2 Target 2020 to 2031	LHMA 2020 to 2031
2015	2016				23		
2016	2017				23		
2017	2018				23		
2018	2019				23		
2019	2020				23		
2020	2021		39	39	23	23	39
2021	2022		15	15	23	23	15

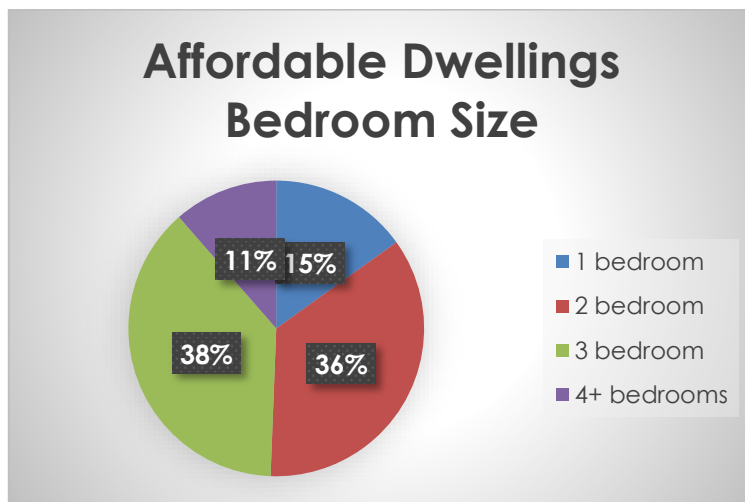
²⁸ Paragraph 4.26 of the Local Housing Market Assessment: The Council estimates that 500 new affordable homes are likely to be delivered in Pembrokeshire over the LHMA period (the next five years). Looking at forecasting for this planning authority an estimate of 100 affordable dwellings being completed is made for the Pembrokeshire Coast National Park.

April	March	LHMA 2020 to 2033 per annum distribution	LHMA est of forecast completions 2020 to 2025	LHMA Total Estimated Provision 2020 to 2033	LDP 2 Target/ Forecast 2015 to 2031	LDP 2 Target 2020 to 2031	LHMA 2020 to 2031
2022	2023		15	15	23	23	15
2023	2024		15	15	23	23	15
2024	2025		15	15	23	23	15
2025	2026	31		31	22	22	31
2026	2027	31		31	22	22	31
2027	2028	31		31	22	22	31
2028	2029	31		31	22	22	31
2029	2030	31		31	22	22	31
2030	2031	31		31	22	22	31
2031	2032	31		31			
2032	2033	31		31			
		245	99	344	362	247	283

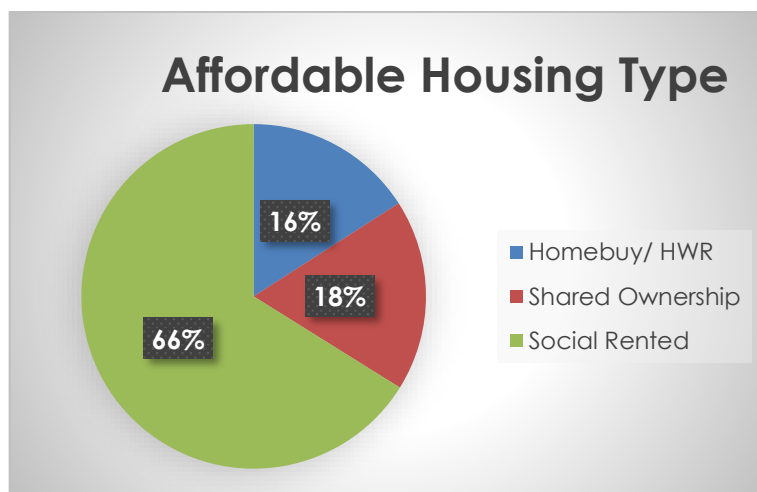
- 3.45 An additional policy area that the Local Housing Market Assessment can provide evidence for is **Policy 52 Housing Mix**. The policy seeks to ensure that all new housing development will be required to include a mix of dwelling sizes, types and tenures having regard to the current evidence of housing need in the National Park. This will mean that the Authority can expect to see a mix of housing on site (i.e. not only the affordable housing element but the market housing as well) that reflects a mix of bedroom sizes as reflected in Table 5.18 above which is taken from the Local Housing Market Assessment.
- 3.46 When we consider bedroom size requirements for market dwellings and affordable housing overall the following requirements emerge for those elements being provided on site once overall split between market housing and affordable housing has been considered²⁹:



²⁹ Policy 47 Housing Allocations or Land with Planning Permission and Policy 48 Affordable Housing sets out the percentage requirements for affordable housing for individual sites and for windfall sites in submarket areas.



3.47 The split between the various types of affordable housing required overall is also quantified in the Housing Market Assessment:



Note: HWR means 'Homes within Reach'

3.48 The National Park Authority is working with Pembrokeshire County Council on the preparation of Affordable Housing Supplementary Planning Guidance using this updated evidence. Part of that work involves exploring the development of a Pembrokeshire shared ownership product.

POLICY PERFORMANCE








3.49 **Indicator 22** minimum 5 years land effectively available is no longer being applied by Welsh Government.

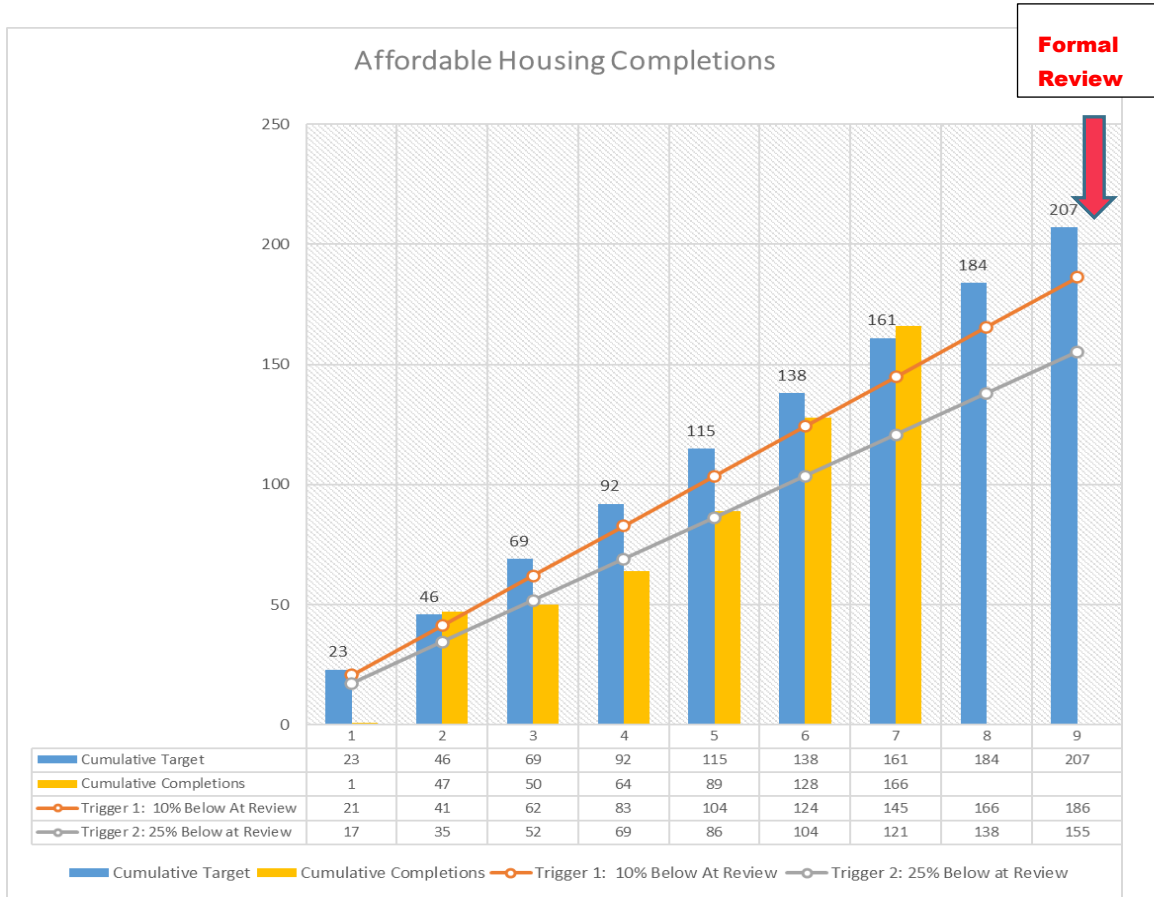
Affordable Housing Development

INDICATOR 23
POLICY 47, POLICY 48, POLICY 49 - THE NUMBER OF NET ADDITIONAL AFFORDABLE DWELLINGS BUILT
TARGET: 362 AFFORDABLE DWELLINGS BUILT OVER THE PLAN PERIOD
TRIGGER: COMPLETIONS 10% BELOW THE TARGET EXPECTED BY THE FORMAL PLAN REVIEW PERIOD (REVIEW TRIGGER IS BEFORE SEPTEMBER 2024 YEAR 4 OF THE ADOPTED PLAN). UNDERTAKE RESEARCH TO ESTABLISH REASONS AND DEPENDENT ON FINDINGS CONSIDER WHETHER ACTIONS ARE NECESSARY TO INCREASE SUPPLY.
COMPLETIONS 25% LESS THAN TARGETS – DETERMINE ACTIONS TO INCREASE SUPPLY OF AFFORDABLE HOUSING, INCLUDING CONSIDERATION OF ADDITIONAL HOUSING ALLOCATIONS.

3.50 The next table and graph provides a breakdown on performance. There will be a need to consider performance at Review Stage i.e., **before Sept 2024 Year 10**.

3.51 Performance to date is from the base date of 2015 and shows the overall cumulative performance is above the target as at April 22.

	Year	Annual Target	Cumulative Target	Trigger 1: 10% Below At Review	Trigger 2: 25% Below at Review	Completed	Cumulative Completions	Cumulative Performance	Action	Overview
Year 1	2015-2016	23	23	21	17	1	1	4%	Continue Monitoring	
Year 2	2016-2017	23	46	41	35	46	47	102%	Continue Monitoring	
Year 3	2017-2018	23	69	62	52	3	50	72%	Continue Monitoring	
Year 4	2018 -2019	23	92	83	69	14	64	70%	Continue Monitoring	
Year 5	2019-2020	23	115	104	86	25	89	77%	Continue Monitoring	
Year 6	2020-2021	23	138	124	104	39	128	93%	Continue Monitoring	
Year 7	2021-2022	23	161	145	121	38	166	103%	Continue Monitoring	



3.52 Affordable housing completions will continue to be monitored to the review period 2024. Sites are also mapped on our website.³⁰

INDICATOR 24
POLICY 46, POLICY 47, POLICY 50 THE NUMBER OF NET ADDITIONAL DWELLINGS BUILT³¹
TARGET: 960 DWELLINGS BUILT OVER THE PLAN PERIOD AT AN AVERAGE RATE OF 62 DWELLINGS PER ANNUM (FROM APRIL 2019) OVER THE PLAN PERIOD (AS INDICATED IN THE HOUSING TRAJECTORY – SEE TABLE BELOW)
TRIGGER: COMPLETIONS 10% BELOW THE TARGET EXPECTED BY THE FORMAL PLAN REVIEW PERIOD (REVIEW TRIGGER IS BEFORE SEPTEMBER 2024 YEAR 4 OF THE ADOPTED PLAN). UNDERTAKE RESEARCH TO ESTABLISH REASONS AND DEPENDENT ON FINDINGS CONSIDER WHETHER ACTIONS ARE NECESSARY TO INCREASE SUPPLY.
COMPLETIONS 25% LESS THAN TARGETS – DETERMINE ACTIONS TO INCREASE SUPPLY OF HOUSING TO DELIVER AFFORDABLE HOUSING, INCLUDING CONSIDERATION OF ADDITIONAL HOUSING ALLOCATIONS AND A REVIEW OF CENTRE BOUNDARIES.

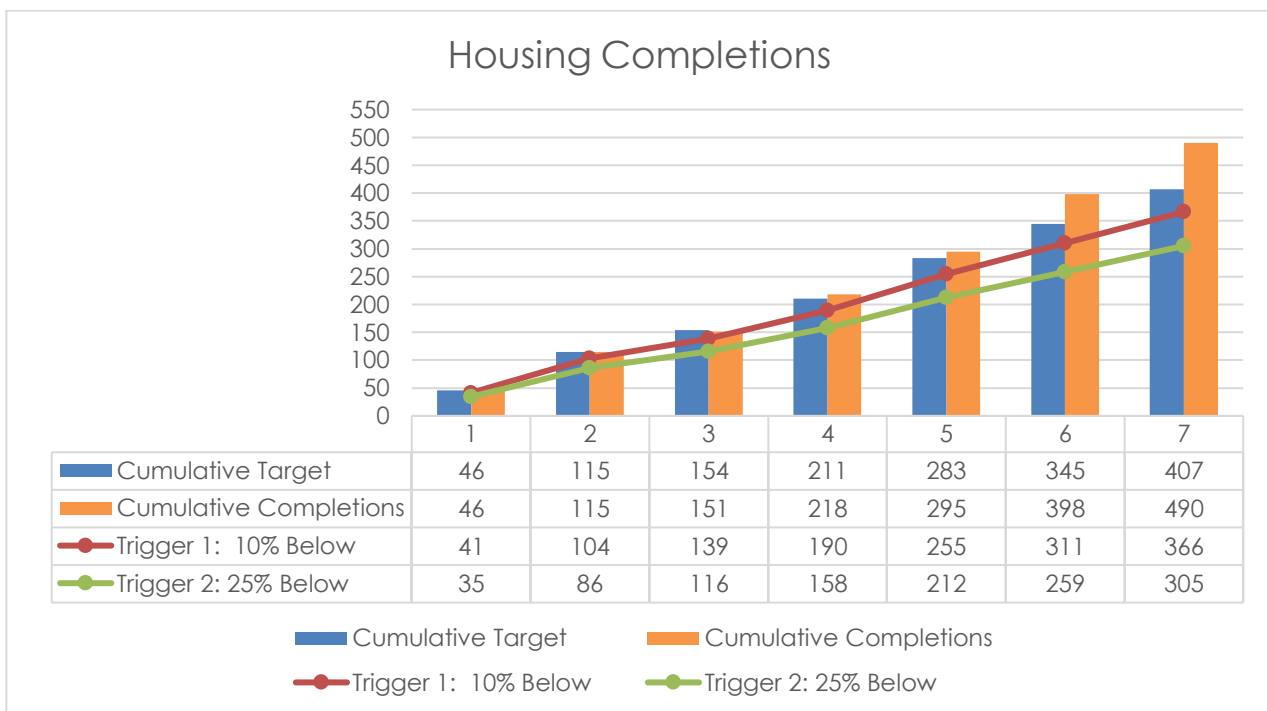
³⁰ [Local Development Plan Annual Monitoring \(arcgis.com\)](https://arcgis.com)

³¹ Please note that the reference to 960 dwellings completed during the Plan Period includes a target of 362 affordable units – See Policy 46 Housing (Strategy Policy).

3.53 Housing completion rates overall are above the cumulative target at this point – April 2022. Formal review stage will allow for a conclusion to be reached regarding whether either Trigger has been reached and what the next steps might be. Sites are also mapped on our website.

32

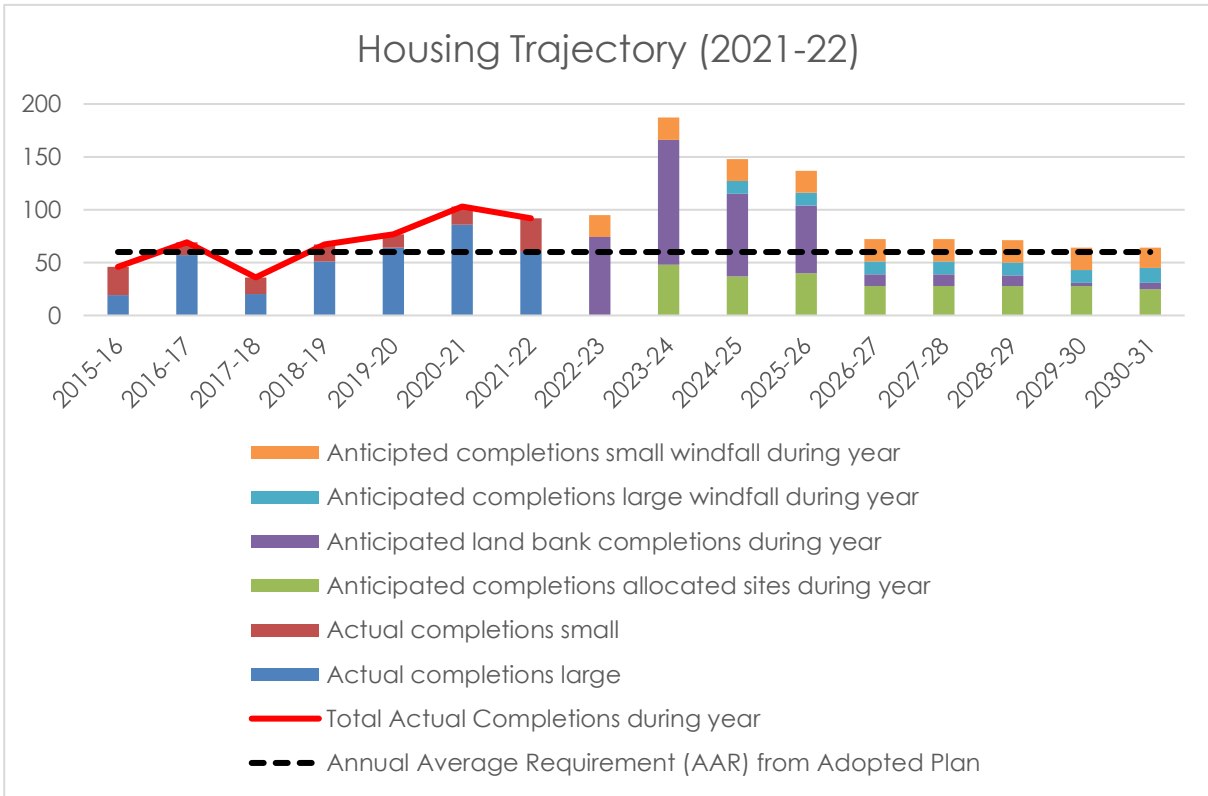
	Year	Annual Target	Cumulative Target	Trigger 1: 10% Below	Trigger 2: 25% Below	Annual Completions	Cumulative Completions	Annual Performance	Cumulative Performance	Action	Overview
Year 1	2015-2016	46	46	41	35	46	46	100%	100%	Continue Monitoring	🟢
Year 2	2016-2017	69	115	104	86	69	115	100%	100%	Continue Monitoring	🟢
Year 3	2017-2018	39	154	139	116	36	151	92%	98%	Continue Monitoring	🟡
Year 4	2018-2019	57	211	190	158	67	218	118%	103%	Continue Monitoring	🟢
Year 5	2019-2020	72	283	255	212	77	295	107%	104%	Continue Monitoring	🟢
Year 6	2020-2021	62	345	311	259	103	398	166%	115%	Continue Monitoring	🟢
Year 7	2021-2022	62	407	366	305	92	490	148%	120%	Continue Monitoring	🟢



3.54 In March 2020, the Welsh Government published the Development Plans Manual (Edition 3), which introduced a requirement for this Authority’s Annual Monitoring Report to include an up-to-date Housing Trajectory and to compare the actual delivery of housing against the AAR (Annual Average Requirement).








3.55 The housing requirement for the Pembrokeshire Coast National Park Local Development Plan 2 is 960 units and is illustrated on an annual basis as a black dotted line in the graph below, an expectation of delivering 60 units per annum. To date the cumulative performance is better than anticipated.

³² [Local Development Plan Annual Monitoring \(arcgis.com\)](https://arcgis.com)




Actual and Forecasted Annual Housing Completions compared against the AAR


LDP Year	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31
Actual completions large	19	57	20	51	64	86	60									
Actual completions small	27	12	16	16	13	17	32									
Anticipated completions allocated sites during year								0	48	37	40	28	28	28	28	25
Anticipated land bank completions during year								74	118	78	64	11	11	10	3	6
Anticipated completions large windfall during year								0	0	12	12	12	12	12	12	14
Anticipated completions small windfall during year								21	21	21	21	21	21	21	21	19
Total Actual Completions during year	46	69	36	67	77	103	92									
Anticipated Annual Build Rate (AABR) from Adopted Plan								95	187	148	137	72	72	71	64	64
Annual Average Requirement (AAR) from Adopted Plan	60	60	60	60	60	60	60	60	60	60	60	60	60	60	60	60


	Annual Target AAR	Actual Annual Completions	Plus/Minus Units	Plus/Minus %	Cumulative Target (AAR)	Cumulative Completions	Plus/Minus	Plus/Minus %	Action	Overview
2015-2016	60	46	-14	-23%	60	46	-14	-23%	Continue Monitoring	
2016-2017	60	69	9	15%	120	115	-5	-4%	Continue Monitoring	
2017-2018	60	36	-24	-40%	180	151	-29	-16%	Continue Monitoring	
2018 -2019	60	67	7	12%	240	218	-22	-9%	Continue Monitoring	
2019-2020	60	77	17	28%	300	295	-5	-2%	Continue Monitoring	
2020-2021	60	103	43	72%	360	398	38	11%	Continue Monitoring	
2021-2022	60	92	32	53%	420	490	70	17%	Continue Monitoring	


3.56 More information on the phasing and delivery of sites for 2022 is provided at the end of the Annual Monitoring Report.


INDICATOR 25
POLICY 47, POLICY 48 HOUSE PRICES, BUILD COSTS, AFFORDABLE RENTS
TARGET: TARGETS FOR AFFORDABLE HOUSING DELIVERY FOR EACH LOCAL MARKET HOUSING AREA ARE MAINTAINED
<p>THE FOLLOWING KEY INDICATORS WILL BE MONITORED:</p> <p>A) HOUSE PRICES – DATA WHICH INCLUDES SECOND HAND AS WELL AS NEW PROPERTIES AND PROVIDES A ROBUST INDICATOR OF PRICE TRENDS.</p> <p>B) BUILD COSTS – PEMBROKESHIRE BENCHMARK BUILD COSTS AND RELEVANT BCIS INDEX; AND,</p> <p>C) AFFORDABLE RENTS – LOCAL HOUSING ALLOWANCE DATA.</p> <p>TRIGGER: THE AUTHORITY WILL CONSIDER IF THERE IS A 10% CHANGE (PLUS OR MINUS) IN ANY ONE INDICATOR SUSTAINED OVER A 12 MONTH PERIOD OR IF</p> <p>A) THERE IS A PLUS OR MINUS CHANGE OF BETWEEN 5-9% IN ANY TWO INDICATORS SUSTAINED OVER A 12 MONTH PERIOD; OR,</p> <p>B) THERE IS LESS THAN 10% CHANGE IN INDICATOR(S) BUT CHANGE IS BEING SUSTAINED OR IF EVIDENCE INDICATES THAT SUSTAINED CHANGE HAS OCCURRED IN OTHER DEVELOPMENT COSTS E.G. FINANCE COSTS, DEVELOPER RETURN REQUIRED.</p> <p>THE AUTHORITY WILL CONSIDER IF CHANGES ARE NEEDED AND WHETHER THIS WOULD REQUIRE A SELECTIVE REVIEW IN ADVANCE OF THE 4-YEARLY FORMAL REQUIREMENT.</p>

Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	(1) 10% change plus or minus. (2) Or 5-9% change in 2 indicators (3) Or less than 10% but change is sustained.	Targets for affordable housing deliver for each local market housing area are maintained.	Build Cost Information Service shows an increase in cost of 9.4%. August 2021 to 2022 for Pembrokeshire. House prices Principality Building Society report July 2022 shows circa 9.9% increase in the year for Pembrokeshire. Nationwide and the Halifax house price change reports show higher increases (circa 13/14%).	Continue Monitoring	Performance remains below the Trigger point 1. Performance has reached Trigger point 2. The increase in build costs are less than the higher house prices achieved. This would indicate that the affordable housing requirements in each local market housing area can be maintained.	








INDICATOR 26						
POLICY 53 GYPSY AND TRAVELLER AND SHOW PEOPLE SITES						
TARGET: AUTHORITY DECISIONS ARE CONSISTENT WITH POLICY						
TRIGGER: 1 OR MORE APPLICATIONS ARE APPROVED CONTRARY TO RECOMMENDATION						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	1	0	0	Continue Monitoring	Performance remains below the Trigger point	

INDICATOR 27						
POLICY 51 HOUSING DENSITY						
TARGET: 30 PER HECTARE TARGET IN THE PLAN'S CENTRES ACHIEVED.						
TRIGGER: 2 OR MORE HOUSING DEVELOPMENTS NOT ACHIEVING 30 DWELLINGS TO THE HECTARE UNLESS AN ALTERNATIVE DENSITY IS JUSTIFIED UNDER POLICY 51						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	2	0	0	Continue Monitoring	Performance remains below the Trigger point	

INDICATOR 28						
POLICY 52 MIX OF HOUSING						
TARGET: DECISIONS CONSISTENT WITH POLICY						
TRIGGER: 2 OR MORE HOUSING DEVELOPMENTS APPROVED CONTRARY TO POLICY 52.						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	2	0	0	Continue Monitoring	Performance remains below the Trigger point	

INDICATOR 29						
POLICY 2 TO POLICY 7 PLAN'S CENTRES						
TARGET: 90% OF HOUSING COMPLETIONS ARE FOCUSED IN THE PLAN'S CENTRES.						
TRIGGER: 20 % OF COMPLETIONS ARE IN THE COUNTRYSIDE BY THE FORMAL PLAN REVIEW PERIOD. UNDERTAKE RESEARCH TO ESTABLISH REASONS AND DEPENDENT ON FINDINGS CONSIDER WHETHER ACTIONS ARE NECESSARY TO THE SPATIAL STRATEGY.						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	20% of completions in the Countryside	90% of completions are in Plan's Centres	Just under 20%	Continue Monitoring	Performance remains below the Trigger point. See commentary below.	

3.57 The figures for 2021-22 show that the number of completions in the Countryside has increased to just under 20% of overall completions (17 dwellings). The strategy to control development in the countryside has not been undermined however, as the completions constitute legacy infill and rounding off opportunities granted under Local Development Plan 1, the removal of accessibility requirements regarding the conversion of appropriate buildings in the countryside under Local Development Plan 2 which has resulted in allowing full residential in appropriate buildings and also the completion of dwellings in locations that were in Rural Centres under Local Development Plan 1 but are now regarded as countryside under Local Development Plan 2.

INDICATOR 30					
POLICY 52 TENURE OF AFFORDABLE HOUSING					
TARGET: 80% OF AFFORDABLE HOUSES PERMITTED ARE AFFORDABLE RENTED PROPERTIES					
TRIGGER: AN ANNUAL REVIEW OF ALL PLANNING PERMISSIONS GRANTED IN THAT YEAR SHOW THAT THE AFFORDABLE HOUSING ELEMENT INCLUDES LESS THAN 75% AFFORDABLE RENTED PROPERTIES. UNDERTAKE RESEARCH TO ESTABLISH REASONS AND DEPENDENT ON FINDINGS CONSIDER WHETHER ACTIONS ARE NECESSARY TO INCREASE SUPPLY.					
YEAR	AFFORDABLE COMPLETIONS	RENTED	% OF TOTAL RENTED	ACTION	OVERVIEW
2015/16	1	1	100	Continue Monitoring	
2016/17	46	46	100	Continue Monitoring	
2017/18	3	3	100	Continue Monitoring	
2018/19	14	14	100	Continue Monitoring	
2019/20	25	25	100	Continue Monitoring	
2020/21	39	39	100	Continue Monitoring	
2021/22	38	38	100	Continue Monitoring	

2F COMMUNITY FACILITIES, RETAILING AND TRANSPORT

KEY OUTCOMES


- a) Existing community facilities are safeguarded and provision enhanced.
- b) The National Park retail centres are vibrant and diverse.
- c) Proposals that could have potentially caused significant concerns regarding traffic have been avoided.

CONTEXT


3.58 **Retailing:** Covid-19 had a significant impact on retailing and town centres. To breathe new life into town centres, the Welsh Government has adopted a 'Town Centre First' approach in Future Wales 2040. In addition, the newly established Retail Forum launched a Retail Strategy in June 2022³³ to develop a shared vision for a successful, sustainable and resilient retail sector that offers fair, secure and rewarding work. Welsh High Street vacancy rates were 16.9% in the first quarter of 2022, a reduction from 17.4% in the last quarter of 2021. These vacancy rates are not reflected in the National Park's Retail Centres, all of which have vacancy rates well below 10%. See Indicator 34 below.


3.59 **Community Infrastructure Levy:** There are no plans at present to pursue a Community Infrastructure Levy in Pembrokeshire.


POLICY PERFORMANCE

INDICATOR 31						
POLICY 54 COMMUNITY FACILITIES & INFRASTRUCTURE REQUIREMENTS						
TARGET: AUTHORITY DECISIONS ARE CONSISTENT WITH POLICY						
TRIGGER: APPROVAL OF 1 OR MORE PLANNING APPLICATIONS CONTRARY TO POLICY 54 IN ANY ONE YEAR						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	1	0	0	Continue Monitoring	Performance remains below the Trigger point	

³³ [A shared strategic vision for the retail sector | GOV.WALES](https://gov.wales)


INDICATOR 32						
POLICY 55 PLANNING OBLIGATIONS						
TARGET: S106 AGREEMENTS SECURED IN LINE WITH GUIDANCE						
TRIGGER: APPROVAL OF 2 OR MORE PLANNING APPLICATIONS CONTRARY TO RECOMMENDATION						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	1	0	0	Continue Monitoring	Performance remains below the Trigger point	

INDICATOR 33						
POLICY 56, 57 RETAIL HIERARCHY						
TARGET: AUTHORITY DECISIONS ARE CONSISTENT WITH POLICY						
TRIGGER: 1 OR MORE DEVELOPMENTS APPROVED CONTRARY TO RECOMMENDATION IN ANY ONE YEAR FOR EITHER POLICY 56 OR POLICY 57						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	1	0	0	Continue Monitoring	Performance remains below the Trigger point	

INDICATOR 34						
POLICY 56 VACANT RETAIL FLOOR SPACE						
TARGET: NO GREATER THAN 10%						
TRIGGER: GREATER THAN 10% VACANT A USE CLASS FLOOR SPACE WITHIN RETAIL CENTRES FOR 2 CONSECUTIVE YEARS						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	Greater than 10% for 2 consecutive years	Less than 10%	Overall vacant floorspace = 5.7%	Continue Monitoring	Performance remains below the Trigger point	

Vacant A Use Class Floor Space in National Park Retail Centres

YEAR	OVERALL	TENBY	ST DAVIDS	NEWPORT	SAUNDERSFOOT
2021-22	5.7%	8.7%	3.2%	0%	0.7%

INDICATOR 35						
POLICY 59 TRANSPORT						
TARGET: 0 APPLICATIONS CONTRARY TO RECOMMENDATION						
TRIGGER: 1 OR MORE APPLICATIONS APPROVED CONTRARY TO RECOMMENDATION						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	1	0	0	Continue Monitoring	Performance remains below the Trigger point	






SUPPLEMENTARY PLANNING GUIDANCE

INDICATOR 37










KEY SUPPLEMENTARY PLANNING GUIDANCE

TARGET: TO ADOPT KEY SUPPLEMENTARY PLANNING GUIDANCE WITHIN 1 YEAR OF THE PLAN'S ADOPTION (SEPT 21) = 6 GUIDANCE DOCUMENTS.

TRIGGER: 1 OR MORE GUIDANCE DOCUMENTS NOT ADOPTED

Status	SEPT 21	Count ³⁴
Adopted		2
Consultation Underway		0
Being drafted/redrafted/		2
Interim/rolled over		4
Later/Stalled		1

All key guidance was in operation as at October 22 either as a rolled over guidance or as adopted following public consultation. The table below explains the timetable going forward. A commentary on the full suite of Guidance can be found in Appendix 7

Title	Position as at September 2021	Status
Affordable Housing	Interim Supplementary Planning Guidance Local Development Plan 2 – September 2020 (with PCC) Preparing joint with PCC for LDP2 alongside an Affordable Housing Strategy for Pembrokeshire.	 
Caravan, Camping and Chalet	Adopted May 2021	
Landscape	Interim Supplementary Planning Guidance Local Development Plan 2 – September 2020 Implementing Interim Guidance until LANDMAP updates received.	 
Planning Obligations	Interim Supplementary Planning Guidance Local Development Plan 2 –September 2020 (with PCC) Review will be led by Pembrokeshire County Council	
Renewable Energy	Adopted May 2021	
Seascape Character	Interim Supplementary Planning Guidance Local Development Plan 2 – September 2020 Preparing an update with PCC. Reporting draft for consultation NPA October 22.	 

³⁴ Guidance may be counted under more than one category

EFFECTIVENESS OF POLICY AND GUIDANCE AT APPEAL

3.60 In the period April 2021 to March 2022 there were seven appeal decisions against refusals for planning permission. Four of these were allowed, two were dismissed and one was partially allowed / partially dismissed.

Application Details	Reasons for Refusal	Appeal Decision ³⁵
NP/19/0522/FUL – Hybrid application: Outline for 14 Affordable Houses and full change of use of land from 85 tents to 85 static caravans with associated landscaping, distributor roads and new sewage pumping station	<p>Refused by Development Management Committee:</p> <p>Policy 60 Impacts of Traffic</p> <p>Adverse impact on immediate and wider landscape and therefore contrary to Policies 8 (Special Qualities, 14 (Conservation of the National Park), 38 (Visitor Economy), 40 (Self-Catering Development) and 41 (Caravan, Camping and Chalet Development) and an impact on privacy and amenity therefore contrary to Policies 14 and 30 (Amenity)</p>	<p>APP/L9503/A/21/3267928</p> <p>Allowed (Costs also awarded) 28/06/2021</p> <p>Inspector considered there would be no adverse effect on highway safety and therefore complied with Policy 60. No increase in pitch numbers and subject to appropriate conditions would result in no conflict with Policies 8 or 14 and would comply with Policies 38 and 41. Policy 40 was considered irrelevant as self-catering development does not include caravans.</p> <p>Inspector also concluded there was no conflict with Policy 30.</p>
NP/19/0522/FUL: The Inspector’s decision did not raise any issues with any of the Local Development Plan Policies that would require a review.		
NP/20/0279/FUL – Parking bay, new doorway, additional windows and rooflights and partial change of use to residential	<p>Refused by Development Management Committee:</p> <p>Rooflights would result in overlooking contrary to Policy 30 (Amenity). (Doorway granted retrospective permission NP/20/0437/FUL on 05/02/2021)</p>	<p>APP/L9503/A/21/3269848</p> <p>Allowed (Costs also awarded) 23/07/2021</p> <p>Rooflights would be elevated well above floor level and therefore no practical opportunity for building occupiers to look down to private amenity space of neighbouring properties therefore no conflict with Policy 30.</p>
NP/20/0279/FUL: The appeal decision does not dispute the appropriateness or the effectiveness of Policy 30. There is no evidence to suggest the Policy would require a review.		

³⁵ [Search for a case - Planning Casework \(gov.wales\)](#)

Application Details	Reasons for Refusal	Appeal Decision ³⁵
<p>NP/20/0435/FUL – Proposed rear and side extension along with remodelling of interior. Demolition of existing garage and redevelopment as two double garages with a one bedroom apartment over.</p>	<p>Proposal was considered to adversely affect the special qualities of the National Park and to be unsuitable development within the context of the setting, the centre, the Conservation Area, the surrounding properties of historic character and the wider landscape. Contrary to Policies 1 (National Park Purposes and Duty), 6(Rural centres), 8(Special Qualities), 11(Nationally Protected Sites and Species), 14(Conservation of the Pembrokeshire Coast National Park), 29(Sustainable Design) and 30(Amenity).</p>	<p>APP/L9503/A/21/3275403 Dismissed 06/08/2021</p> <p>Inspector concluded that there was no conflict with Policy 11, but agreed that the proposal would not preserve or enhance the character or appearance of the Conservation Area and contrary to Policies 1,6,8,14 and 29.</p>
<p>NP/20/0279/FUL: The dismissal of the appeal citing these policies shows that they are performing effectively.</p>		
<p>NP/20/0230/FUL – a One Planet Development consisting of Cabin, Greenhouse, Compost Toilet, Barn with Lean to Goose House and PV array.</p>	<p>Proposal was considered to cause harm to the special qualities of the National Park and in particular degrade the visual amenity and experience currently enjoyed by users of the public footpath which runs through the site and is contrary to Policies 1 (National Park Purposes and Duty), 7 (Countryside), 8 (Special Qualities), 14 (Conservation of the Pembrokeshire Coast National Park) and 29 (Sustainable Design).</p>	<p>APP/L9503/A/21/3271493 Allowed 09/12/2021</p> <p>The Inspector considered that the site cannot be viewed by walkers on the footpath approaching from the southeast until they actually enter the site and that users would not be significantly harmed in their quality of experience and enjoyment of the special qualities of the National Park. There is therefore no conflict with Policies 1, 8 or 14.</p> <p>Proposed buildings would comply with Policy 29.</p>
<p>NP/20/0230/FUL: The Inspector considered that there would be no significant harm to the special qualities of the National Park. The appeal decision does not dispute the appropriateness or the effectiveness of the policies. There is no evidence to suggest the policies would require a review.</p>		
<p>NP/20/0421/OUT – Demolition of existing industrial buildings and erection of two dwellings.</p>	<p>The proposed density of the development on a rare brownfield site does not accord with the requirements of Policy 51 (Housing Densities)</p>	<p>APP/L9503/A/21/3280831 Dismissed 23/12/2021</p> <p>The Inspector considered that it has not been sufficiently demonstrated that the proposed development would make optimal use of a brownfield</p>

Application Details	Reasons for Refusal	Appeal Decision ³⁵
		site within a settlement, thereby conflicting with Policy 51.
NP/20/0421/OUT: The dismissal of the appeal citing Policy 51 shows that the policy is performing effectively.		
NP/18/0666/FUL – Subdivision of host dwelling to include linked holiday let unit without complying with condition 6 – removal of static caravan from the site.	Condition 6 of the planning permission required the removal of the existing caravan within 6 months of the grant of planning permission.	APP/L9503/A/21/3281670 Allowed 07/01/2022 Condition is not reasonable or necessary and its removal would be consistent with Policies 1, 8, 14 and 30.
NP/18/0666/FUL: The appeal decision does not dispute the appropriateness or the effectiveness of the policies. There is no evidence to suggest the policies would require a review.		
NP/21/0404/ADV - Erection of 3 no. high level building mounted halo illuminated individual letter and roundel signs, 1 no. halo illuminated fascia sign and 1 no. non-illuminated directional sign.	Planning permission granted for the display of the advertisements. Condition 3 stated that the permitted signs shall be non-illuminated in perpetuity in order to protect the visual amenity and the special qualities of the National Park and therefore compliance with Policies 1 (National Park Purposes and Duty, 8 (Special Qualities), 9 (Light Pollution), 14 (Conservation of the Pembrokeshire Coast National Park), 29 (Sustainable Design and 30 (Amenity)	CAS-01587-R4N0P1 Dismissed 22/03/2022 (relating to east- and west-facing signs). The Inspector considered that the night-time illuminated east and west facing signs would blight and materially encroach on the remote and tranquil night time character and cause material harm to the National Park's natural beauty and therefore conflict with Policies 1, 8, 9, 14, 29 and 30. Allowed (relating to south-facing signs) South-facing signs are not prominent from the surrounding countryside and illumination would not cause visual harm.
NP/21/0404/ADV: The dismissal of the appeal citing the above policies shows that they are performing effectively.		

4. SUSTAINABILITY APPRAISAL MONITORING

SUSTAINABILITY OBJECTIVE PROGRESS

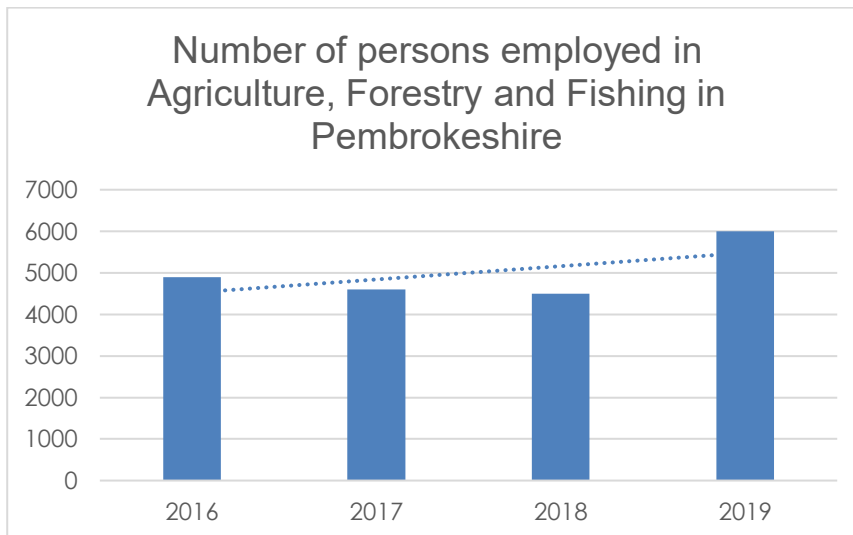
SUSTAINABILITY OBJECTIVE 1

Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well-being.

COMMENTARY:

Figures for work place employment by industry and areas from Stats Wales provide a reasonable indicator as to the health of the agriculture and forestry sectors in the County. Current data indicates a decline in employment in the agriculture, forestry and fishing between 2016 and 2018, followed by a sharp rise in employment in these sectors in 2019.

Year	Action	Analysis	Overview
2021 – 2022	Continue Monitoring	Further data is required to make conclusions – latest data included.	-




SUSTAINABILITY OBJECTIVE 2

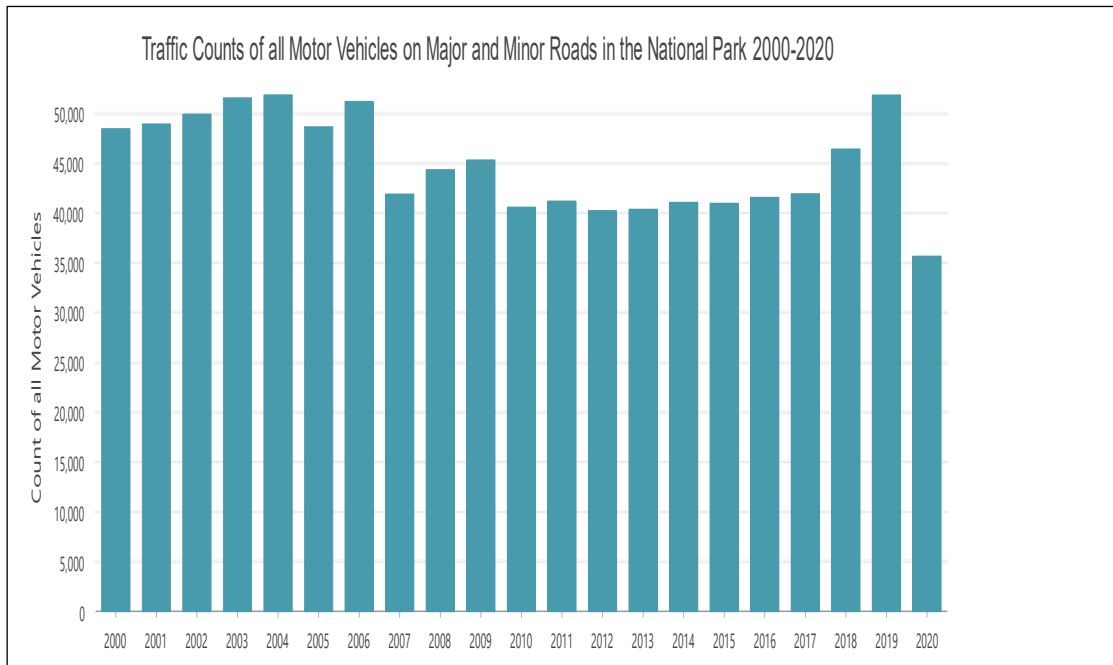
Locate developments so as to minimise the demand for travel, especially by private car

COMMENTARY:

Traffic counts from the Department for Transport for survey locations within the National Park show that between 2010 and 2017, traffic levels remained much the same. However, beyond 2017 (excluding 2020, which is the lowest value in the range due to the COVID-19 pandemic) indications are that traffic levels may have been returning to the levels similar to those experienced between 2000 and 2006. To conclude, at present, outliers within the data make it difficult to forecast a trend, future releases will be used to monitor the situation. Contributions to this objective by the Local Development Plan arise, largely, through the maintenance or improvement of community facilities, and by restricting development in areas where there are low levels of community infrastructure.

LDP Indicator 31: (Policy 54 Community Facilities and Infrastructure Requirements) indicates that no critical community facilities have been lost and that no planning permissions for their loss have been granted contrary to the requirements of Policy 54 (also see SA Objective 13).

Year	Action	Analysis	Overview
2021- 2022	Continue Monitoring	Performance remains acceptable.	



SUSTAINABILITY OBJECTIVE 3

Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology) with reference to the special qualities of the National Park.

COMMENTARY:


Concerns about long term changes to the quality of the landscape in the National Park are part of the rationale behind this objective.

The Local Development Plan contributions to this SA Objective through the application of policy and supplementary planning guidance on the special qualities of the National Park, Landscape Protection, Renewable Energy and the Cumulative Impact of Wind Turbines.

Performance against Indicator 4 shows that one application has been approved contrary to officer recommendation during this monitoring period. The nature of the contrary approval concerns camping and caravanning development in an inappropriate location.

Indicator 14 concerns the application of the Renewable Energy policy and SPG with regard to the cumulative impacts of wind turbines on the landscape and visual amenity. During this monitoring period no approvals have been made that are not consistent with the policy or SPG.

CONCLUSION: Given that this is the first year of monitoring it is too early to draw conclusions. However, the approval of a planning application contrary to policy 8 is cause for concern.

Year	Action	Analysis	Overview
2021- 2022	Further investigation/Research required	Performance here is of concern as the special qualities are core to the National Park designation.	


SUSTAINABILITY OBJECTIVE 4

Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.

COMMENTARY:

The role of the Local Development Plan in meeting this objective is likely to be restricted to its role in determining applications proposing development to support such activity, and securing planning obligations to develop cycle ways and footpaths.

Performance Indicator 31 (Policy 54 Community Facilities & Infrastructure Requirements) shows that the policy is performing well as no planning applications have been approved contrary to Policy 54 during this monitoring period or the life of the Plan so far.

Year	Action	Analysis	Overview
2021- 2022	Continue Monitoring	Performance remains acceptable.	

SUSTAINABILITY OBJECTIVE 5

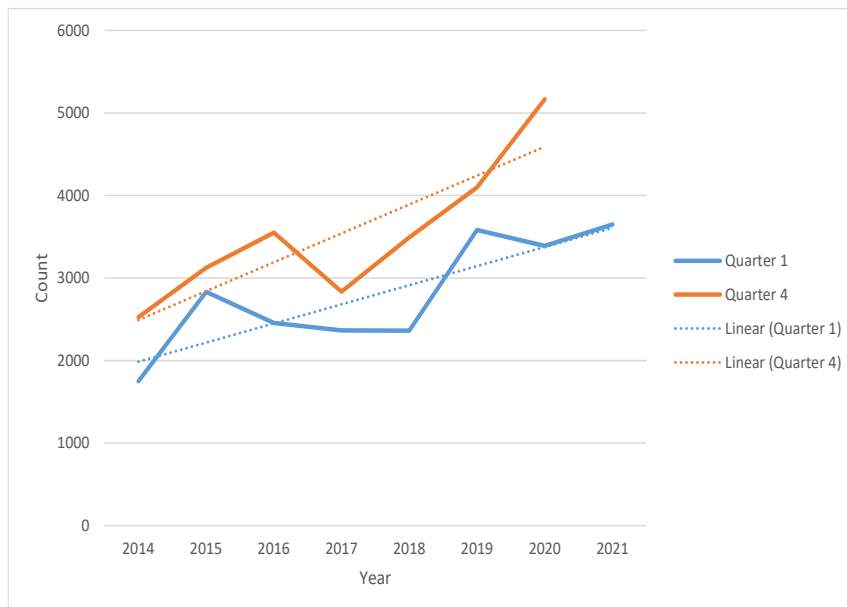
Increase the number of visitors using the National Park outside the peak visitor season.

COMMENTARY:

The Local Development Plan may contribute to this SA Objective through the provision of a range of recreational and accommodation facilities that may provide year-round uses. Policy 38 (Visitor Economy) makes allowances for development facilities for visitors. No recreational development has been approved during this monitoring period contrary to Policy 38.

Approvals for self-catering accommodation since adoption of the Plan may help meet the aim to improve the suitability of accommodation for year-round use. During this monitoring period four applications for the construction or conversion of properties to holiday lets have been approved.

Year	Action	Analysis	Overview
2021 – 2022	Continue Monitoring	Further data is required to make conclusions – latest data included.	-




Footpath counters for the inland network in the National Park indicate a trend of increase in use outside of peak season (Q1&Q2) over the last seven years. The jump in Q4 use in 2020 is likely to be due to the COVID-19 Pandemic.

SUSTAINABILITY OBJECTIVE 6

Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.

COMMENTARY:

The Local Development Plan will contribute towards this objective primarily by not adding to the amount of infrastructure at risk from fluvial/coastal flooding. Performance against indicator 15 (Policy 34) shows that one application was permitted in a C2 flood zone during this monitoring period (see page 20 for details). LDP policies 35-37 designate “Coastal Risk Management Areas” and make allowances for the relocation and replacement of homes and community facilities, helping to enable the coastal communities in the National Park adapt to the effects of climate change.

Year	Action	Analysis	Overview
2021- 2022	Further investigation/Research required	Performance here is of concern as the special qualities are core to the National Park designation.	

SUSTAINABILITY OBJECTIVE 7


Reduce factors contributing to climate change.

COMMENTARY:

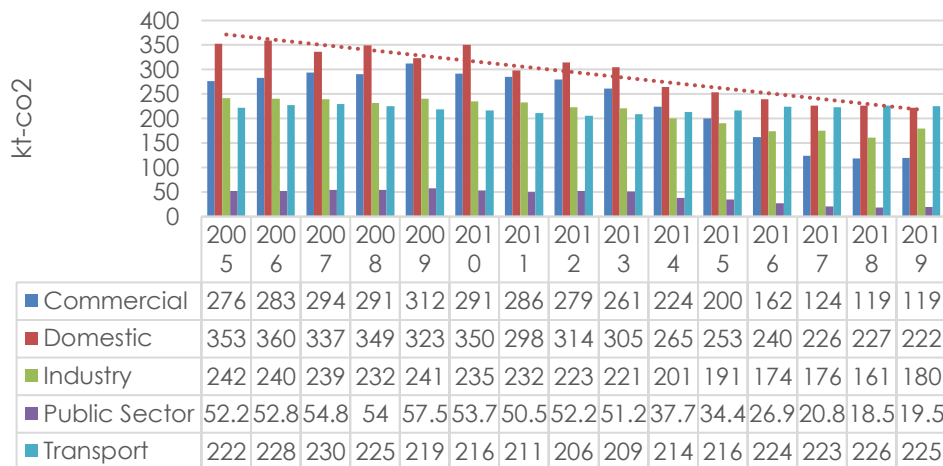
The most recent Local Authority estimates by the Department for Energy and Climate (2005-2019) show that the largest sources of carbon, within the scope of influence for Local Authorities, for Pembrokeshire have historically been domestic, commercial, industry and transport. Since 2016 the composition has shifted with domestic and transport being the primary sources in the County at roughly equal outputs. Also from 2016 emissions have plateaued showing no further significant increases or decreases.

The Local Development Plan contributes to this SA Objective by ensuring that new developments are efficient in their use of energy and materials; by approving appropriate renewable energy schemes, and by promoting the retention or expansion of community facilities.

Indicators 11 (Policy 29 Sustainable Design), 12 (Renewable Energy schemes permitted), 13 (Renewable Energy Capacity) and 31 (Policy 54 Community Facilities and Infrastructure Requirements) all show good performance and no decisions contrary to their related policies for this monitoring period.

Year	Action	Analysis	Overview
2021- 2022	Continue Monitoring	Performance remains acceptable.	

2005 to 2019 local authority carbon dioxide (CO₂) emissions: Pembrokeshire



Emissions source: [2005 to 2019 local authority carbon dioxide \(CO₂\) emissions dataset \(revised\) - Datasets - Integrated Data Service \(qss-data.org.uk\)](#)

SUSTAINABILITY OBJECTIVE 8

Maximise the contribution of the limited opportunities for development to sustaining local communities

COMMENTARY:

Progress of this objective will largely be through housing development and the provision of affordable housing.

Indicator 23 (Affordable Housing, Policy 52) shows good progress towards the LDP targets for affordable housing.

Year	Action	Analysis	Overview
2021- 2022	Continue Monitoring	Performance remains acceptable.	

SUSTAINABILITY OBJECTIVE 9

Encourage access for all to the National Park, reflecting the social mix of society.

COMMENTARY:

Contributions to this SA Objective from the Local Development Plan arise mostly through the provision of affordable housing, and through the provision of range of holiday accommodation types that suit all budgets.

Indicators 23 and 30 indicate reasonable progress towards the LDP targets for housing.

Year	Action	Analysis	Overview
2021- 2022	Continue Monitoring	Performance remains acceptable.	

SUSTAINABILITY OBJECTIVE 10**Maintain the cultural distinctiveness of communities.**

This sustainability objective covers the breadth of aspects that contribute to the unique character and cultural distinctiveness of the National Park.

COMMENTARY:

This sustainability objective covers the breadth of aspects that contribute to the unique character and cultural distinctiveness of the national park.


Within the context of the Local Development Plan, achievements towards this objective will be threefold. Firstly the Local Development Plan will be able to contribute towards the objective by helping to ensure that people who grew up in the National Park are able to have the opportunity to continue living here once they are adults by sustaining local communities and enabling access to employment (see SA Objective 8).

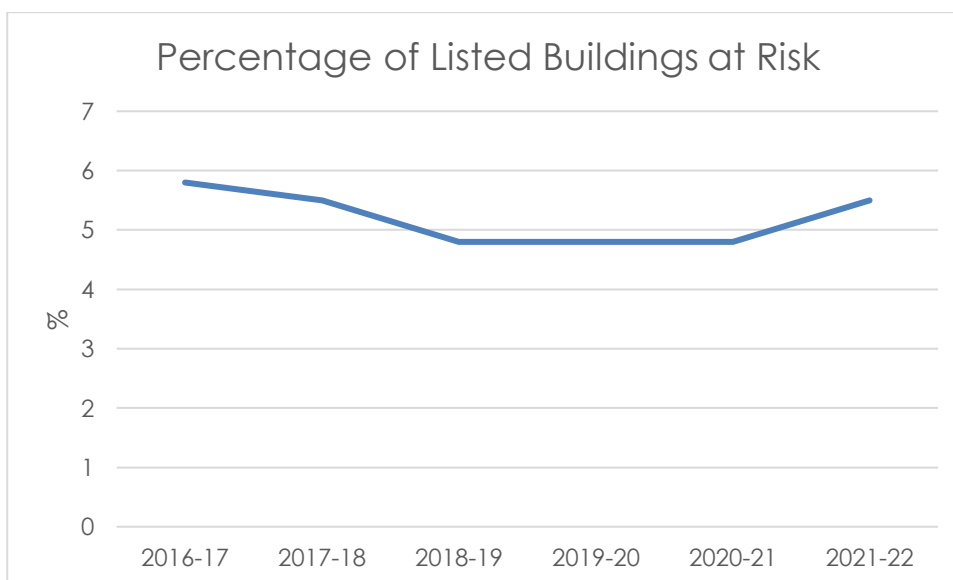
Secondly, the Local Development Plan will be able to contribute to the objective by helping to maintain and enhance culturally significant built environment and natural environment features.

Thirdly, by helping to protect the Welsh language.

In terms of maintaining listed buildings less than 10% (5.5%) are identified as being at any degree of risk. There is also potential for Listed Buildings to have a change of use/conversion. Between the 1st April 2021 and 31st March 2022 six applications for the change of use or conversion were approved.

Indicator 5 (Policy 13 Welsh Language) indicates that there have been no decisions made contrary to Welsh Language policy in this monitoring period. Indicator 23 (Policies 47-49) shows that completions of affordable housing units in this monitoring period have exceeded the target. The provision of affordable housing contributes to this SA Objective by helping people to remain in their communities.

Year	Action	Analysis	Overview
2021- 2022	Continue Monitoring	Performance remains acceptable.	




SUSTAINABILITY OBJECTIVE 11

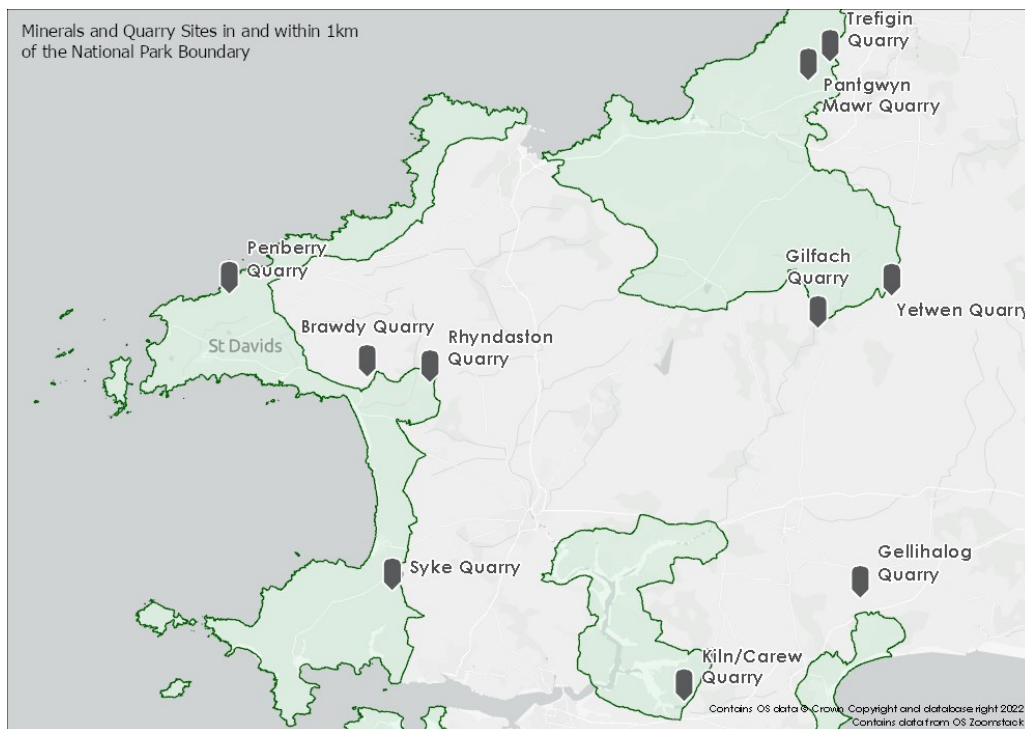
The adverse effects of minerals exploitation in the National Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.

COMMENTARY:

No approvals for minerals development were made during this monitoring period (indicator 9). No other issues around minerals extractions have arisen during this monitoring period.

The map below shows the locations of minerals extraction sites in and within 1km of the National Park. This includes all sites both active and closed.

Year	Action	Analysis	Overview
2021- 2022	Continue Monitoring	Performance remains acceptable.	




SUSTAINABILITY OBJECTIVE 12**Reduce the negative impacts of waste.****COMMENTARY**

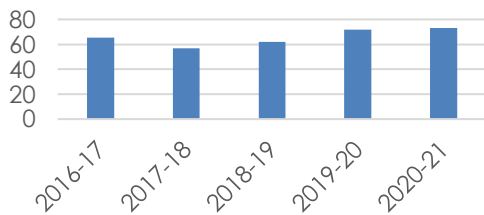
Policies 27 and 28 make allowances for waste management and composting facilities to be created that benefit communities in the national park subject to the location being appropriate. No applications contrary to these policies (see indicator 10) have been approved during this monitoring period.

The level of recycling in the county has increased in recent years (see below), and the rates of fly tipping have decreased.

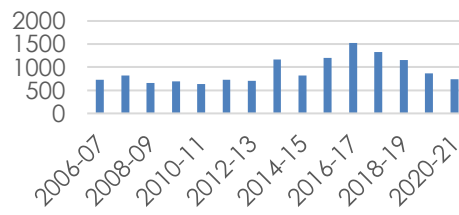
Following the introduction of the new household recycling and waste collection service in November 2019, Pembrokeshire is now Wales' top recycler.

Year	Action	Analysis	Overview
2021- 2022	Continue Monitoring	Performance remains acceptable.	

Percentage of Waste Reused/Recycled (Statutory Target) Pembrokeshire by...



Total Recorded Incidents of Fly-tipping Pembrokeshire




SUSTAINABILITY OBJECTIVE 13

Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population.

COMMENTARY:

In terms of facilities available that qualify Centres as Rural Centres there has been a loss of qualifying facilities in two split Centres outside the Authority's planning jurisdiction. The extent of the settlements in the Authority's jurisdiction is not significant in scale. Continue monitoring to appraise at review stage. In terms of the larger Centres the range of facilities required to qualify these Centres as Tier 1 and Tier 2 Centres remain. Changes in the main findings are:

- an increase in the number of primary schools in Tenby
- a small reduction in the number of pubs in Tenby and Saundersfoot.

Year	Action	Analysis	Overview
2021- 2022	Continue Monitoring	Performance remains acceptable.	


SUSTAINABILITY OBJECTIVE 14

Maintain and enhance biodiversity both within and outside designated sites

COMMENTARY:

Contributions to this SA objective from the Local Development Plan come through the Plan's Biodiversity policies, and through biodiversity enhancements to developments included as conditions of planning permission.

120 planning applications either included biodiversity enhancements or biodiversity enhancements were requested as a condition of permission.

Year	Action	Analysis	Overview
2021- 2022	Continue Monitoring	Performance remains acceptable.	

Biodiversity Enhancements

Total to AMR Period

Increase this year

120

-

SUSTAINABILITY OBJECTIVE 15

Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.


COMMENTARY:

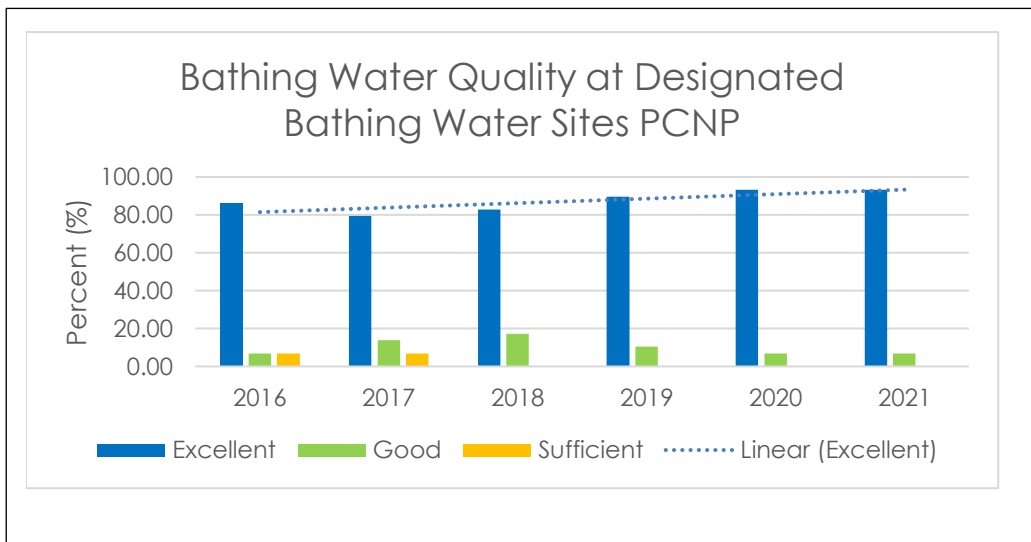
Phosphorous in Rivers: Planning applications affecting phosphorus sensitive river Special Areas of Conservation³⁶

In January 2021 NRW published a report in which it presented its assessment of how much phosphorus there is in SAC rivers measured against revised water quality targets. The evidence review showed that over 60% of the water bodies assessed in SAC river catchments were failing to meet the revised water quality targets for phosphorus. Some new developments such as housing or agricultural enterprises can lead to increased amounts of phosphorus entering the river environment from additional wastewater or from poor management of manures and slurries. Under the Habitats Regulations, Planning Authorities must consider the phosphorus impact of proposed developments on water quality within SAC river catchments. Currently there are two affected areas in the National Park where limited development takes place (Rosebush and Bosherton). The issue will continue to be monitored.

Information on Marine SACs is also awaited.

Bathing water quality continues to improve.

Year	Action	Analysis	Overview
2021- 2022	Continue Monitoring	The strategy of the Plan is not affected by current issues with phosphorous elsewhere in Pembrokeshire.	



³⁶ [Natural Resources Wales / Advice to planning authorities for planning applications affecting phosphorus sensitive river Special Areas of Conservation](#)

ADDITIONAL CONTEXTUAL INDICATOR

Extract from Inspector's Report paragraph 3.34: *provide additional contextual indicators to monitor:*

- *the number of households with no usual resident*
- *Homes on the Council Tax database subject to the second home premium*
- *the provision of community facilities / services*
- *and schools and school occupancy levels*

Dealing with each in turn

The number of households with no usual resident 2011:

A breakdown is provided in the Authority's Background Paper for the Local Development Plan Examination on 'Principal Residence and/or local Connections'³⁷ Policy using Census 2011 figures. The relevant extract is copied below for ease of reference. **The first opportunity to have comparator information will be when the 2021 Census data is published.**

HOUSEHOLDS WITH 'NO USUAL RESIDENT'³⁸:

DEFINITIONS:

The 2011 Census defines a "household space" as accommodation used or available for use by an individual household. For the purposes of the Census households spaces are identified as having at least one usual resident or as having no usual resident.

Household spaces that have no usual resident are not simply vacant household spaces they can be vacant or used as a second home or holiday homes.

(Ranked by percentage)

(Highlighted cells indicate communities that have 25% or greater households with no usual resident)

Table 10 No Usual Resident

Community	Percent no usual resident	Within the National Park?
Lamphey	48.2	Partly
Newport	37.3	In
The Havens	35.5	Partly
Dale	33.3	In
Marloes & St Brides	31.9	In

³⁷ <https://www.pembrokeshirecoast.wales/wp-content/uploads/2019/12/Exam111-HS1-AP10.pdf>

³⁸ A household space with no usual residents may still be used by short-term residents, visitors who were present on census night, or a combination of short-term residents and visitors. Vacant household spaces, and household spaces that are used as second addresses, are also classified in census results as 'household spaces with no usual residents'.

Community	Percent no usual resident	Within the National Park?
<i>Dinas Cross</i>	29.5	<i>In</i>
<i>Saundersfoot</i>	28.6	<i>In</i>
<i>Pencaer</i>	28.4	<i>Partly</i>
<i>St Mary Out Liberty</i>	28.1	<i>Partly</i>
<i>St Davids</i>	26.9	<i>In</i>
<i>Llanrhian</i>	26.5	<i>Partly</i>
<i>Nolton & Roch</i>	26	<i>Partly</i>
<i>Amroth</i>	25.3	<i>Partly</i>
<i>Solva</i>	25.2	<i>Partly</i>

Homes on the Council Tax database subject to the second home premium:

Second homes – number of second homes in the area (threshold – more than 25%). A breakdown is provided in the above Background Paper - see also the Table below for ease of reference highlighting those specific communities where the threshold is reached. An update is provided for 2021 and 2022.

Community	Percentage of homes subject to the second homes council tax premium 2019 (25% or more highlighted)	Percentage of homes subject to the second homes council tax premium 2021(25% or more highlighted)	Percentage of homes subject to the second homes council tax premium 2022 (25% or more highlighted)
Caldey	26%	35%	30%
Dale	34%	32%	36%
Newport	26%	25%	25%
The Havens	29%	30%	31%

Caldey: There have been no housing completions in Caldey during this period. That can only mean that properties already built on the island have been re-categorised as second homes for the purposes of Council Tax and then re-categorised for 2022.

Dale shows a small percentage increase overall. No completions have been recorded for the Community Council area for the period 2019 to 2022.

There has been a small decline in the percentage shown as Second Homes in **Newport** between 2019 and 2022.

In **The Havens**, where there has been an increase from 29% to 31% there have been completions of both market dwellings and affordable housing. Council Tax records relate to all the housing stock in the Community rather than just newly completed dwellings so it is difficult to comment further. The increase in those properties paying the second home premium could possibly be as a result of the development of market dwellings but a direct link cannot be proven.

The provision of community facilities

In terms of facilities available that qualify Centres as Rural Centres there has been a loss of qualifying facilities outside the Authority's planning jurisdiction in two split Centres. The extent of the settlements in the Authority's jurisdiction is not significant in scale. There is a need to continue monitoring in order to appraise the situation at review stage. In terms of the larger Centres the range of facilities required to qualify these Centres as Tier 1 and Tier 2 Centres remain. The main findings are:

- an increase in the number of primary schools in Tenby
- a small reduction in the number of pubs in Tenby and Saundersfoot.

Schools and School Occupancy Levels

An update was provided by Pembrokeshire County Council in July 2022. In summary **the Authority was advised that the commentary provided for the Local Development Plan Examination³⁹** (copied below for ease of reference) **'remains a true reflection of the current situation.** *Needless to say Covid may well change the situation, due to families choosing to move to Pembrokeshire from larger towns and cities, and thereby putting more pressure on school places in certain areas. In the case of St Dogmaels, however, we have anecdotal evidence to suggest that properties are being bought by older people, not necessarily second homes, thereby denying younger families and therefore reducing the local pupil population.'*

Additionally;

"We (Pembrokeshire County Council) will be undertaking a significant piece of work during the coming months with a view to producing a School Organisation Plan which will set out the broad aims and objectives in terms of school organisation for the coming 5 years. This will need to consider a number of issues including area population trends, forecast pupil numbers, surplus places and occupancy data..."

EXTRACT FROM THE LOCAL DEVELOPMENT PLAN 2 BACKGROUND PAPER ON 'PRINCIPAL RESIDENCE AND/OR LOCAL CONNECTIONS POLICY'

Gwynedd and Anglesey data/indicators: Gwynedd and Anglesey refer to empty school places as an indicator of lower numbers of families in the wards of interest.

- *The Authority contacted the Children and Schools Directorate at Pembrokeshire County Council and asked if there were any existing issues in the county, particularly those schools that have catchments within or partly within the National Park.*
- *The Authority has been advised that there are a number of schools which have catchments within the National Park area. A number of these have, and are likely to continue to have, sufficient spare places to be able to accommodate additional pupil yield from new housing, e.g. St Dogmael's CP, Ysgol Eglwysrwrw and Ysgol Llanychllwydog. However, there are other schools that have limited spare capacity and are likely to come under increased pressure from additional housing yield; such schools are Ysgol Penrhyn Dewi VA, Coastlands*

³⁹ See page 62 (page 123 of the PDF) of Appendix 2 in the Authority's Background Paper on 'Principal Residence and/or Local Connections Policy' <https://www.pembrokeshirecoast.wales/wp-content/uploads/2019/12/Exam111-HS1-AP10.pdf>

CP and Lamphey CP. It should be noted that in the case of schools such as Stepside CP, there is likely to be pressure arising from housing developments arising from both the National Park and County Council planning areas.

- *In short it is not the case that all communities in the National Park are suffering from high numbers of empty school places, indeed some schools may come under pressure from new development within the Park during the plan period.*
- *Table 13 below, describes the relationship between the catchments of the primary school mentioned above and the communities in the National Park.*

School	National Park Communities (within or partly within catchment)
<i>Coastlands CP</i>	<i>Dale, Herbrandston, Marloes and St Brides, Milford Haven, St Ishmaels, The Havens, Walwyns Castle</i>
<i>Lamphey CP</i>	<i>Carew, Lamphey, Manorbier, Stackpole & Castlemartin</i>
<i>Saundersfoot CP</i>	<i>Amroth, Saundersfoot, St Mary Out Liberty</i>
<i>St Dogmael's CP</i>	<i>Nevern, St Dogmaels</i>
<i>Stepaside CP</i>	<i>Amroth, Carew, St Mary Out Liberty</i>
<i>Ysgol Bro Ingli</i>	<i>Cwm Gwaun, Dinas Cross, Newport, Nevern</i>
<i>Ysgol Eglwysrwr</i>	<i>Eglwysrwr, Nevern</i>
<i>Ysgol Llanychllwydog</i>	<i>Cwm Gwaun, Eglwysrwr, Nevern, Newport, Nevern, Puncheston</i>
<i>Ysgol Penrhyn Dewi</i>	<i>Brawdy, Hayscastle, Llanrhian, Mathry, Nolton & Roch, Solva, St David's, The Havens</i>

Conclusion: A review of the data overall shows that:

- The Census 2021 figure on dwellings with no usual resident is awaited so that a comparison can be drawn with the 2011 figures.
- With regard to properties paying Council Tax premium there has been a small decline in some communities. There has also been a small increase in some communities. The increase in those properties paying the second home premium could possibly be as a result of the development of market dwellings where such completions took place.
- With regard to community facilities there is no clear indication that there has been a deterioration in the range of facilities available in Centres.
- No change in the situation regarding schools and schools occupancy.

Since the receipt of the Inspector's Report for Local Development Plan 2 (2020) there has been significant debate and proposed changes in relation to second homes and holiday lets by the Welsh Government. The implications of the outcome of this work will need to be considered by the Authority in due course.

APPENDIX 1 THE TIMING AND PHASING OF NEW ALLOCATIONS

Allocated Site Name	Total Site Capacity	Time lag to construction start in months			Phasing of Development (2015 - 2031)											
		Time period for pre-application discussions / PAC consultation	Time between submission of planning application and determination	Time taken from planning consent to the discharge of relevant conditions to enable site construction	Completions	U/C	2022 - 23	2023 -24	2024 -25	2025 - 26	2026 -27	2027 -28	2028 - 29	2029 - 30	2030 -31	Units beyond the plan period
Land North of the Business Park (HA1)	15									2	2	2	2	2	5	
Land at Sandy Hill (HA2)	68						11	11	12	7	7	7	7	6		
North of Whitlow (HA3)	54						9	9	9	5	5	5	6	6		
Penny Farm (HA4)	36						6	6	6	4	4	4	3	3		
North, east and south of Marine Road (HA5)	87						11	11	13	6	6	6	6	6	22	
West of the Green (HA7)	10									2	2	2	2	2		
Glasfryn Field (HA8)	7									1	1	1	1		3	
Land adjacent to Bryngolau (HA9)	10									1	1	1	1		6	
Land off Cefn Gallod (HA10) NP/21/0577/FUL	11	28 days					11									
	298						0	48	37	40	28	28	28	28	36	

APPENDIX 2 THE TIMING AND PHASING OF SITES WITH PLANNING PERMISSION

Settlement Tier	Site Name	Total Site Capacity	Completions	U/C	2022 - 23	2023 -24	2024 -25	2025 - 26	2026 -27	2027 -28	2028 - 29	2029 - 30	2030 -31	Units beyond the plan period
Tenby (Tier 1)	White Lion Street / Deep Park / Upper Park Road (Delphi) (NP/11/064)	62	51											11
Tenby (Tier 1)	Brynhir (NP/19/0361/OUT)	144				42	51	51						
Newport (Tier 2)	Feidr Eglwys (NP/15/0194/FUL)	35	35											
Saundersfoot (Tier 2)	Cambrian Hotel (NP/12/0054)	29	13											16
Saundersfoot (Tier 2)	The Incline (Ocean Point) (99/254, 06/611 and NP/14/0439)	20	16											4
St. Davids (Tier 2)	North of Twr y Felin (99/254 and 06/611)	9	8											1
St. Davids (Tier 2)	Land at Glasfryn Road (NP/18/0051/OUT)	70	70											
St. Davids (Tier 2)	West and East of Glasfryn Road (NP/18/0575/OUT and NP/19/0648/RES)	58	14		23	21								
St. Davids (Tier 2)	Adjacent Ysgol Bro Dewi (NP/18/0488/OUT)	11				5	6							
Dinas Cross (Tier 3)	North of Bay View Terrace (NP/19/0548/FUL)	17		17	17									
Jameston (Tier 3)	Green Grove (NP/15/0287/OUT)	9	8		1									
Jameston (Tier 3)	Opposite Bush Terrace (NP/18/0610/FUL)	38				21			4	4	3	3	3	

Settlement Tier	Site Name	Total Site Capacity	Completions	U/C	2022 - 23	2023 -24	2024 -25	2025 - 26	2026 -27	2027 -28	2028 - 29	2029 - 30	2030 -31	Units beyond the plan period
Lawrenny (Tier 3)	Adjacent Home Farm (NP/18/0622/FUL)	39			13	13	13							
Manorbier Station (Tier 3)	Buttyland (NP/19/0522/FUL) Outline for housing	14						7	7					
Manorbier Station (Tier 3)	Land at Station Road (NP/17/0283/FUL)	23			11	12								
Rosebush (Tier 3)	Near Belle Vue (NP/13/0086)	5			5									
Solva (Tier 3)	Ynys Dawel (HR/6124)	6						3					3	
St. Ishmaels (Tier 3)	Adj Primary School, Trewarren Road (NP/16/0219/OUT)	13			4	4	5							
St. Ishmaels (Tier 3)	Land off Trewarren Road (NP/18/0396/OUT)	14								7	7			
Countryside (Tier 4)	Blockett Lane, Little Haven (10/511)	6					3	3						
Countryside (Tier 4)	Boulston Manor, Uzmaston (04/400)	5												5
Countryside (Tier 4)	Rear of Caeglas, Whitchurch (05/509)	5	5											
Totals		632	220	17	74	118	78	64	11	11	10	3	6	37