

## Report of Planning Officer (Strategic Policy)

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### **Subject: 2023 Annual Monitoring Report on the Pembrokeshire Coast National Park Local Development Plan 2**

#### **Purpose of Report**

1. The Annual Monitoring Report is a document which is produced by the Authority each October, looking back at the previous financial year, from 1 April to the 31 March.
2. The Report should assess the extent to which Local Development Plan 2 strategy and policies are being achieved.
3. The Report measures various indicators to assess the performance of the individual planning policies set out in the adopted Local Development Plan and to provide a general portrait of the social, economic and environmental conditions in the Park.
4. 'Key Findings' can be found at the beginning of the document which sets out where issues have arisen and what further action is required.
5. This is the second Annual Monitoring Report since the adoption of Local Development Plan 2 in September 2020 covering the financial year April 2022 to end of March 2023. Members are asked to agree this Annual Monitoring Report for submission to Welsh Government by the end of October 2023.
6. The Annual Monitoring Report has been published for consultation and the representations received are in Appendix B along with an Officer proposed response. Members are asked to agree these responses.

#### **Risk considerations**

7. This is a statutory requirement. The annual monitoring report is completed in accordance with Welsh Government regulations and guidance.

#### **Financial considerations**

8. Local Development Plan monitoring is budgeted for by the Authority.

#### **Equality considerations**

9. The Public Equality Duty requires the Authority to have due regard to the need to eliminate discrimination, promote equality of opportunity and foster good

relations between different communities. This means that, in the formative stages of our policies, procedure, practice or guidelines, the Authority needs to take into account what impact its decisions will have on people who are protected under the Equality Act 2010 (people who share a protected characteristic of age, sex, race, disability, sexual orientation, gender reassignment, pregnancy and maternity, and religion or belief). This is a monitoring report and does not contain policy, procedure, practice or guidelines.

10. The process for Local Development Plan preparation and its rigorous assessment procedures includes an Equality Impact Assessment.

### **Welsh Language considerations**

11. The publication and consultation exercises were carried out in accordance with the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards Regulations (No.1) 2015.

### **Human Rights considerations**

12. The planning system seeks to progress legitimate aims by managing the development and use of land in the public interest to contribute to achieving sustainable development. It reconciles the needs of development and conservation, securing economy, efficiency, and amenity in the use of land, and protecting natural resources and the historic environment. Human rights under Articles 1 (right to peaceful enjoyment to property), 8 (right to respect for the home, private and family life) and 14 (right to equality), are the most relevant ones. Proportionality means that the measure which interferes with the right must strike a fair balance between the aim and the right which it interferes with.
13. The process for Local Development Plan preparation and its rigorous assessment procedures will support this approach. This, however, is a monitoring report and does not contain policy, procedure, practice, or guidelines.

### **Recommendation**

- (1) That the responses to the representations received in Appendix B to this report be approved.**
- (2) That the attached Annual Monitoring Report (see Appendix A) for the Pembrokeshire Coast National Park Local Development Plan 2 be approved for submission to the Welsh Government by the 31<sup>st</sup> October 2023.**

#### **Background Documents**

[Pembrokeshire Coast National Park Local Development Plan 2](#)

[Development Plans Manual Edition 3 Welsh Government](#)

[Welsh Statutory Instrument 2005 No. 2839 The Town & Country Planning \(Local Development Plan\) \(Wales\) Regulations 2005](#)

[Welsh Statutory Instrument 2015 No.1598 The Town & Country Planning \(Local Development Plan\) \(Wales\) \(Amendment\) Regulations 2015](#)

*(For further information, please contact Gayle Lister on ext. 4875)*

# Pembrokeshire Coast National Park

## Local Development Plan 2

(end date 2031)



Annual Monitoring Report 2  
October 2023

Pembrokeshire Coast National Park Authority



Parc Cenedlaethol  
Arfordir Penfro  
Pembrokeshire Coast  
National Park

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## 1. INTRODUCTION

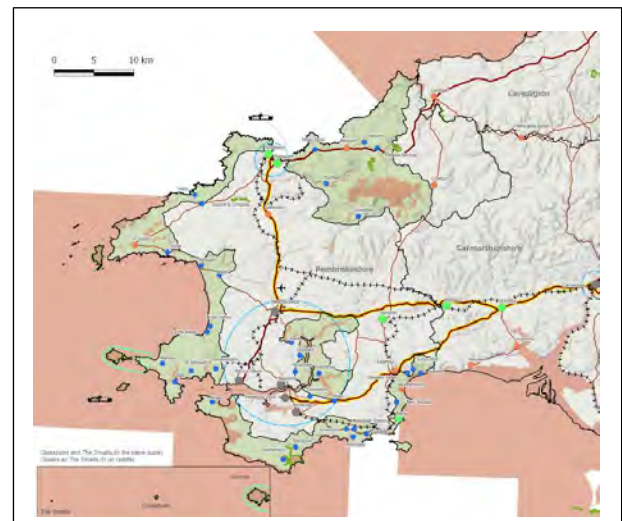
1.1 The Pembrokeshire Coast National Park is situated right out on the west coast of Wales. In addition to being the smallest of the National Parks (at 240 sq mls / 620 sq km), it is also the most densely populated (some 23,000 people live here). It takes the form of a narrow coastal strip (except for 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 second report is for the financial year April 2022 to end of March 2023.



## 2. KEY TRENDS AT A GLANCE

- 2.1 This is the second Annual Monitoring Report for the Pembrokeshire Coast National Park Local Development Plan 2. It covers the second full financial year since Local Development Plan 2 was adopted in September 2020, and covers the financial year from April 2022 to March 2023. It is a statutory requirement for the report to be submitted to the Welsh Government by the 31<sup>st</sup> October 2023.
- 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	Training Required. More explanation can be found in Chapter 3
3	Sustaining Communities	Continue Monitoring
4	Special Qualities	Training Required. More explanation can be found in Chapter 3.
5	Welsh Language	Continue Monitoring
6	Landscape Seascape	Training Required. More explanation can be found in Chapter 3.
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	Training Required. More explanation can be found in Chapter 3.
16	Recreation	Continue Monitoring
17	Hotels	Continue Monitoring
18	Self Catering	Continue Monitoring
19	Caravan & Camping	Continue Monitoring
20	Employment	Continue Monitoring
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

LDP Indicator No.	Topic	Performance Versus Target
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	Training Required. 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	Training Required. 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.



## NATIONAL PARK PURPOSES AND DUTY AND THE SPATIAL STRATEGY

### KEY OUTCOMES

- (1) The special qualities of the National Park have been conserved and enhanced.
- (2) Development takes place in accordance with the strategy of the Local Development Plan.
- (3) Development permitted helps to sustain local communities.

### CONTEXT

3.5 Planning Policy Wales Edition 11<sup>1</sup>  
This edition was published in February 2021 after Local Development Plan 2 was adopted (September 2020). A review has been undertaken of the document for the first Annual Monitoring Report to identify any new matters that need to be taken into account.<sup>2</sup> Appendix 4 in the link below contains that review.

3.6 For this Annual Monitoring Report (No.2) it should be noted that Welsh Government intend to publish Planning Policy Wales 12 in this calendar year (2023). A summary of the changes known so far are related to housing and second homes. This Annual Monitoring Report chapter on Visitor Economy provides more commentary.



### Community Facilities Survey

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.

3.7 A follow up survey was undertaken in 2022 which found a loss of qualifying facilities in two split Centres, where the lost facilities were outside this Authority's planning jurisdiction. A further survey undertaken in 2023 has found that 3 Centres have lost their convenience shop, although they still have sufficient facilities to qualify as Rural Centres. Two of the Centres are split Centres with the former shop being outside of this Authority's jurisdiction. In addition, two Centres have lost a pub. One of these is wholly within the National Park and retains sufficient services to remain as a Rural Centre. The other is a split Centre and now would have insufficient services to qualify as a Rural Centre.

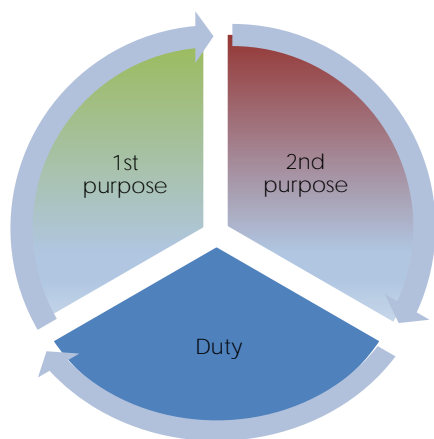
<sup>1</sup> [Planning Policy Wales - Edition 11 \(gov.wales\)](https://gov.wales/sites/default/files/publications/2021-02/planning-policy-wales-edition-11_0.pdf)  
[https://gov.wales/sites/default/files/publications/2021-02/planning-policy-wales-edition-11\\_0.pdf](https://gov.wales/sites/default/files/publications/2021-02/planning-policy-wales-edition-11_0.pdf)

<sup>2</sup> <https://www.pembrokeshirecoast.wales/annual-monitoring-report/>

3.8 The changes recorded are not significant in nature. There will be a need to continue monitoring and appraise at review stage and to consider the need to comment on Pembrokeshire County Council's LDP2 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.

POLICY PERFORMANCE

INDICATOR 1								
DECISIONS CONTRARY TO RECOMMENDATION								
TARGET IS 0								
TRIGGER: 3% OF PLANNING APPLICATIONS <sup>3</sup> 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.	
2022-2023	391	4	3%	0%	1%	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.

<sup>3</sup> 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> <sup>4</sup>	
2022-2023	1	0	3	Training Required	See below for analysis.	

### Analysis:



**Application 1:** Officer Recommendation to refuse – contrary to Policy 35 Development in the Coastal Change Management Area, Policy 1 National Park Purposes and Duty, Policy 8 Special Qualities, Policy 14 Conservation and Enhancement of the National Park and Policy 30 Amenity.<sup>5</sup>

**Applications 2 and 3:** Officer Recommendation to refuse – contrary to Policy 2e) Tenby Service and Tourism Centre, Policy 8 Special Qualities, Policy 11 Nationally Protected Sites and Species, Policy 29 Sustainable Design and Policy 30 Amenity.<sup>6</sup>

<sup>4</sup> 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))

<sup>5</sup> For further information see Officer Report [NP\\_22\\_0193-1.pdf \(pembrokeshirecoast.wales\)](#) and Development Management Committee minutes [DEVELOPMENT MANAGEMENT COMMITTEE \(pembrokeshirecoast.wales\)](#) (Item 7(b))

<sup>6</sup> For further information see Officer Reports [NP\\_22\\_0482.pdf \(pembrokeshirecoast.wales\)](#), [NP\\_22\\_0483.pdf \(pembrokeshirecoast.wales\)](#) and Development Management Committee minutes [DEVELOPMENT MANAGEMENT COMMITTEE \(pembrokeshirecoast.wales\)](#) (items 6 (h) and (i)).

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.	
2022-2023	2	0	0	Continue Monitoring	Performance remains below the Trigger point.	

## SPECIAL QUALITIES

## KEY OUTCOMES

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

## CONTEXT

3.9 There have been no contextual updates since the last Annual Monitoring Report.

## 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	See below for analysis.	
2022-2023	2	0	3	Training Required.	See next page for analysis.	

## Analysis:



2021-2022: 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. <sup>7</sup>

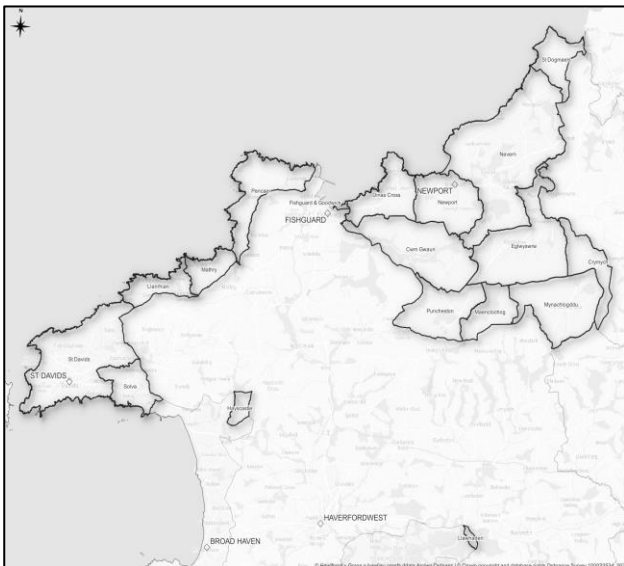
<sup>7</sup> For further information see Officer Reports [NP\\_21\\_0149.pdf \(pembrokeshirecoast.wales\)](#) [NP\\_21\\_0149\\_FUL.pdf \(pembrokeshirecoast.wales\)](#) and Development Management Committee minutes [DEVELOPMENT MANAGEMENT COMMITTEE \(pembrokeshirecoast.wales\)](#) (item 6 (f)) [DEVELOPMENT MANAGEMENT COMMITTEE \(pembrokeshirecoast.wales\)](#) (item 6 (a))

2022-2023: **Application 1:** Officer Recommendation to refuse – contrary to Policy 35 Development in the Coastal Change Management Area, Policy 1 National Park Purposes and Duty, Policy 8 Special Qualities, Policy 14 Conservation and Enhancement of the National Park and Policy 30 Amenity.<sup>8</sup>

**Applications 2 and 3:** Officer Recommendation to refuse – contrary to Policy 2e) Tenby Service and Tourism Centre, Policy 8 Special Qualities, Policy 11 Nationally Protected Sites and Species, Policy 29 Sustainable Design and Policy 30 Amenity.<sup>9</sup>

The trigger of 2 approvals contrary to recommendation has been breached.



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	
2022-2023	2	0	0	Continue Monitoring	Performance remains below the Trigger point	



Welsh Language Sensitive Areas

<sup>8</sup> For further information see Officer Report [NP\\_22\\_0193-1.pdf \(pembrokeshirecoast.wales\)](#) and Development Management Committee minutes [DEVELOPMENT MANAGEMENT COMMITTEE \(pembrokeshirecoast.wales\)](#) (Item 7(b))

<sup>9</sup> For further information see Officer Reports [NP\\_22\\_0482.pdf \(pembrokeshirecoast.wales\)](#), [NP\\_22\\_0483.pdf \(pembrokeshirecoast.wales\)](#) and Development Management Committee minutes [DEVELOPMENT MANAGEMENT COMMITTEE \(pembrokeshirecoast.wales\)](#) (items 6 (h) and (i)).



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. <sup>5</sup>	
2022-2023	2	0	1	Training Required	Officer Recommendation to refuse – contrary to Policy 35 Development in the Coastal Change Management Area, Policy 1 National Park Purposes and Duty, Policy 8 Special Qualities, Policy 14 Conservation and Enhancement of the National Park and Policy 30 Amenity. <sup>6</sup>	



<sup>5</sup> 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))

<sup>6</sup> For further information see Officer Report [NP\\_22\\_0193-1.pdf \(pembrokeshirecoast.wales\)](#) and Development Management Committee minutes [DEVELOPMENT MANAGEMENT COMMITTEE \(pembrokeshirecoast.wales\)](#) (Item 7(b))





<b>INDICATOR 7</b>
<b>DECISIONS CONTRARY TO POLICY 15 OR POLICY 16</b>
<b>TARGET IS 0 % LOSS OF GREENFIELD<sup>7</sup>, OPEN SPACE<sup>8</sup>, GREEN WEDGE</b>
<b>TRIGGER: APPROVAL OF 1 PLANNING APPLICATIONS CONTRARY TO RECOMMENDATION IN ANY ONE YEAR.</b>

<b>INDICATOR 7 GREENFIELD</b>						
Year	Trigger	Target	Performance	Action	Analysis	Overview
<b>2021-2022</b>	1	0	0	Continue Monitoring	Performance remains below the Trigger point	
<b>2022-2023</b>	1	0	0	Continue Monitoring	Performance remains below the Trigger point.	

<b>INDICATOR 7 OPEN SPACE</b>						
Year	Trigger	Target	Performance	Action	Analysis	Overview
<b>2021-2022</b>	1	0	0	Continue Monitoring	Performance remains below the Trigger point	
<b>2022-2023</b>	1	0	0	Continue Monitoring	Performance remains below the Trigger point.	

<sup>7</sup> Except for land released in accordance with the Plan's policies.

<sup>8</sup> Except where they can be retained, enhanced or alternative provision can be made.

INDICATOR 7 GREEN WEDGE						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	1	0	0	Continue Monitoring	Performance remains below the Trigger point	
2022-2023	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

- 3.10 **Minerals:** The annual monitoring of reserves and the 2<sup>nd</sup> review of the Regional Technical Statement (RTS) for the North Wales and South Wales Regional Aggregate Working Parties will continue to inform planning decisions on a regional and national basis. The 2<sup>nd</sup> 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.
- 3.11 **Waste:** The second report for the new region of Mid and South-West Wales Waste Planning Monitoring Report covers the period 2022-23. 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 2023. 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 has been a steady increase in recycling and composting rates over the years. The Mid and SW Wales region has consistently performed better than Wales as a whole for most of the last nine years, and the Towards Net Zero target of achieving at least 64% recycling by 2019/20 was achieved at both the regional and Wales level. Whilst there was a slight reduction at the regional level in the most recent reporting period (2021/22), the 2024/25 target of 70% (which Pembrokeshire has already met for the third consecutive year) looks achievable.
  - The predicted remaining landfill capacity for the region is 5.5 years, (a reduction in voidspace from last year's 7.5 years). Whilst this has not dropped below the 5 year trigger set out in Technical Advice Note 21: Waste – the threshold identified for pursuing any action which may be necessary to facilitate future landfill



provision – the situation would suggest that preliminary discussions in terms of appropriate actions should be considered by the stakeholders concerned. This would include Welsh Government, Natural Resources Wales, local authorities (both Planning and Waste Teams) as well as the Waste Industry.



- Following the introduction of the new household recycling and waste collection service in November 2019, Pembrokeshire’s recycling rates in 2023 were the highest in Wales for the third year running (73.2%).

## POLICY PERFORMANCE

INDICATOR 8						
APPROVAL OF MAJOR DEVELOPMENT <sup>9</sup> 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.	
2022-2023	1	0	0	Continue Monitoring	Performance remains below the Trigger point.	

<sup>9</sup> What constitutes ‘major development’ and ‘exceptional circumstances’ in National Parks is defined in Planning Policy Wales.

INDICATOR 9						
APPROVAL OF MINERALS DEVELOPMENT <sup>10</sup> 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.	
2022-2023	1	0	0	Continue Monitoring	Performance remains below the Trigger point. <sup>11</sup>	

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.	
2022-2023	2	0	0	Continue Monitoring	Performance remains below the Trigger point.	

<sup>10</sup> What constitutes 'exceptional circumstances' in National Parks is defined in Planning Policy Wales.

<sup>11</sup> Variation of condition for an additional 12 years for excavation, restoration and aftercare at a quarry granted approval. Not a new or extended mineral site and therefore trigger not breached.

## 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

- 3.12 **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.
- 3.13 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.
- 3.14 **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.** The National Park Authority 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 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.
- 3.15 A further round of consultation with Local Authorities ensued throughout the summer of 2022 in the form of a workshop and discussion. At the start of 2023, Natural Resources Wales wrote to all Planning Authorities and Planning and Environment Decisions Wales stating that the Development Advice Map used alongside the extant TAN15 was out of date and that they intended to refer also to the regularly updated Flood Map for Planning, proposed for use with the emerging, updated TAN15. This has raised issues for the National Park Authority when considering some applications which are inside flood risk areas on one map but not in the other. The changes in terminology between the two TAN15's also causes difficulties when trying to apply the extant TAN15 policy alongside the Flood Map for Planning.

- 3.16 Almost at the same time the Welsh Government issued a second consultation on the emerging TAN15, specifically relating to further amendments made to the document as a result of the first consultation. That consultation closed in April 2023. The deadline of 1<sup>st</sup> June 2023 for the publication of the revised TAN has now passed and it is anticipated by the end of this calendar year.
- 3.17 In the meantime the Stage 1 SFCA for the SW Wales area was completed in December 2022. The report details past known flood events, which within the National Park are at Solva, Nevern, Dale, Amroth, Broad Haven, Angle, Tenby and Newport Parrog. The greatest risk within the National Park is tidal flooding which is likely to occur during storm surge conditions. This can occur in unprotected areas and also where defences are breached by means of a mechanical failure or overtopping. It is noted that tides may affect flooding much further inland during extreme events, especially if sea levels rise as predicted.
- 3.18 The study concludes that many of the Authorities within the south-west Wales region will need to progress to stage 2 or 3 SFCA to support Local Development Plan development. These stages will identify the potential for flooding of candidate sites and if necessary whether it can be managed to an acceptable level. Progression beyond Stage 1 for the National Park area was not considered necessary as none of the sites allocated for development in LDP2 are in flood risk areas.
- 3.19 Concerns regarding the Authority's implementation of the policies contained in the Plan to control further speculative development in flood risk areas are discussed elsewhere in this Report and a need for Member training has been identified.



## 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.	
2022-2023	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 <sup>12</sup>					
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.	
2022-2023	Planning Permissions to contribute to an overall renewable Heat Target for the National Park of 9.8 GWh.	0.495 GWh from 7 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.	



<sup>12</sup> 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 <sup>13</sup>					
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.	
2022-2023	Planning Permissions to contribute to an overall Renewable Electricity Target for the National Park of 38.9 GWh.	0.067 GWh from 149 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 nondomestic schemes generally benefit from Permitted Development Rights and therefore are not included in the overall Electricity generation capacity.	

<sup>13</sup> 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.

<b>INDICATOR 14</b>						
<b>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</b>						
<b>TARGET IS 0 APPROVALS CONTRARY</b>						
<b>TRIGGER: 3 OR MORE DECISIONS CONTRARY TO POLICY 33 RENEWABLE ENERGY IN CONJUNCTION WITH ITS SUPPORTING SUPPLEMENTARY PLANNING GUIDANCE</b>						
Year	Trigger	Target	Performance	Action	Analysis	Overview
<b>2021-2022</b>	3	0	0	Continue Monitoring	Performance remains below the Trigger point.	
<b>2022-2023</b>	3	0	0	Continue Monitoring	Performance remains below the Trigger point.	

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 <sup>14</sup>	
2022-2023	1	0	2	Training Required	See below for analysis <sup>15</sup>	

#### Analysis:

2021-2022: 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.

2022-2023: Both applications related to commercial premises within existing C2 flood risk areas. In both case the Development Management Committee acknowledged the flood risk but considered that this was outweighed by social and economic viability and would allow work to be undertaken to improve the appearance of the local area. Both proposals are contrary to the Authority's policy which is to reduce risk to life and property over time in flood risk areas. The trigger of 1 approval contrary to recommendation has been breached.

<sup>14</sup> 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))

<sup>15</sup> For further information see Officer Reports [22\\_0104.pdf \(pembrokeshirecoast.wales\)](#) [NP\\_22\\_0104-1.pdf \(pembrokeshirecoast.wales\)](#) and Development Management Committee minutes [DEVELOPMENT MANAGEMENT COMMITTEE \(pembrokeshirecoast.wales\)](#) (item 7(f)) [DEVELOPMENT MANAGEMENT COMMITTEE \(pembrokeshirecoast.wales\)](#) (item 7(a)).

For further information see Officer Report [NP\\_22\\_0193-1.pdf \(pembrokeshirecoast.wales\)](#) and Development Management Committee minutes [DEVELOPMENT MANAGEMENT COMMITTEE \(pembrokeshirecoast.wales\)](#) (Item 7(b))

## 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

3.20 Welsh Government and policy for second homes and short-term holiday lets **Welsh Government**<sup>16</sup> announced on the 28<sup>h</sup> of September 2022:

- Changes to planning regulations. These introduced three new planning use classes – a primary home, a second home and short-term let 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. They have also introduced changes to national planning policy to give local authorities the ability to control the number of second homes and holiday lets in any community.

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

- Continues to explore data and evidence that might inform the establishment of an Article 4 Direction by undertaken including research into potential impacts on house prices and the Welsh Language.
- Is considering the imposition of planning conditions on applications for planning permission on a case-by-case basis via the normal development management procedures.<sup>17</sup>



3.22 **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 Local Development Plan 1 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.



<sup>16</sup> <https://www.gov.wales/written-statement-changes-planning-legislation-and-policy-second-homes-and-short-term-lets>



<sup>17</sup> [https://www.pembrokeshirecoast.wales/wp-content/uploads/2023/03/08\\_23-Planning-Policy-Changes-re-Second-Homes-abd-Short-term-lets.pdf](https://www.pembrokeshirecoast.wales/wp-content/uploads/2023/03/08_23-Planning-Policy-Changes-re-Second-Homes-abd-Short-term-lets.pdf)



- 3.23 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.
- 3.24 The outcome of relaxing the policy position on new sites needs to be monitored. Adoption of Local Development Plan 2 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.
- 3.25 Overall, during this monitoring period there have been 6 planning applications for camping, caravan and chalet development which were approved resulting in a further 16 static caravan pitches and 6 glamping pods. All but two of the static pitches are in existing caravan sites.
- 3.26 **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 Welsh Government has not yet responded to this element of the consultation. A consultation was undertaken by the UK Government in February this year to allow 60-camping within England. The change has subsequently been made to the General Permitted Development Order and came into effect on 26<sup>th</sup> July 2023.
- 3.27 There continues to be widespread disregard for regulations for camping and caravan sites outside of planning control in the National Park with both 28-day sites and Exemption Certificate sites operating well beyond their permitted development period. Monitoring of these sites continues to challenge the limited resources of the Authority. Whilst there has been only one Certificate of Lawfulness, relating to a static caravan pitch within an existing site, during this monitoring period, the number of sites being operated by the Exemption Certificate scheme has increased by an estimated 34%.
- 3.28 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.

## 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.	
2022-2023	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.	
2022-2023	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.	
2022-2023	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 next page for analysis. <sup>18</sup>	
2022-2023	2	0	0	Continue Monitoring	Performance remains below the Trigger point.	

<sup>18</sup> 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))



**Analysis:**

**2021-2022:** 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.

**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
<b>2021-2022</b>	2	0	0	Continue Monitoring	Performance remains below the Trigger point.	
<b>2022-2023</b>	2	0	0	Continue Monitoring	Performance remains below the Trigger point.	

**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
<b>2021-2022</b>	2	0	0	Continue Monitoring	Performance remains below the Trigger point.	
<b>2022-2023</b>	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

- 3.29 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.<sup>19</sup>
- 3.30 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 in the Visitor Economy, Employment and Rural Diversification chapter.
- 3.31 Local Housing Market Assessment July 2021<sup>20</sup>: The Authority is party to a County wide housing market assessment which will replace the 2021 Assessment. The Council intend to complete the LHMA in the financial year 2023 to 2024.

### POLICY PERFORMANCE

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









<sup>19</sup> <https://gov.wales/new-house-building> copy and paste into the web browser

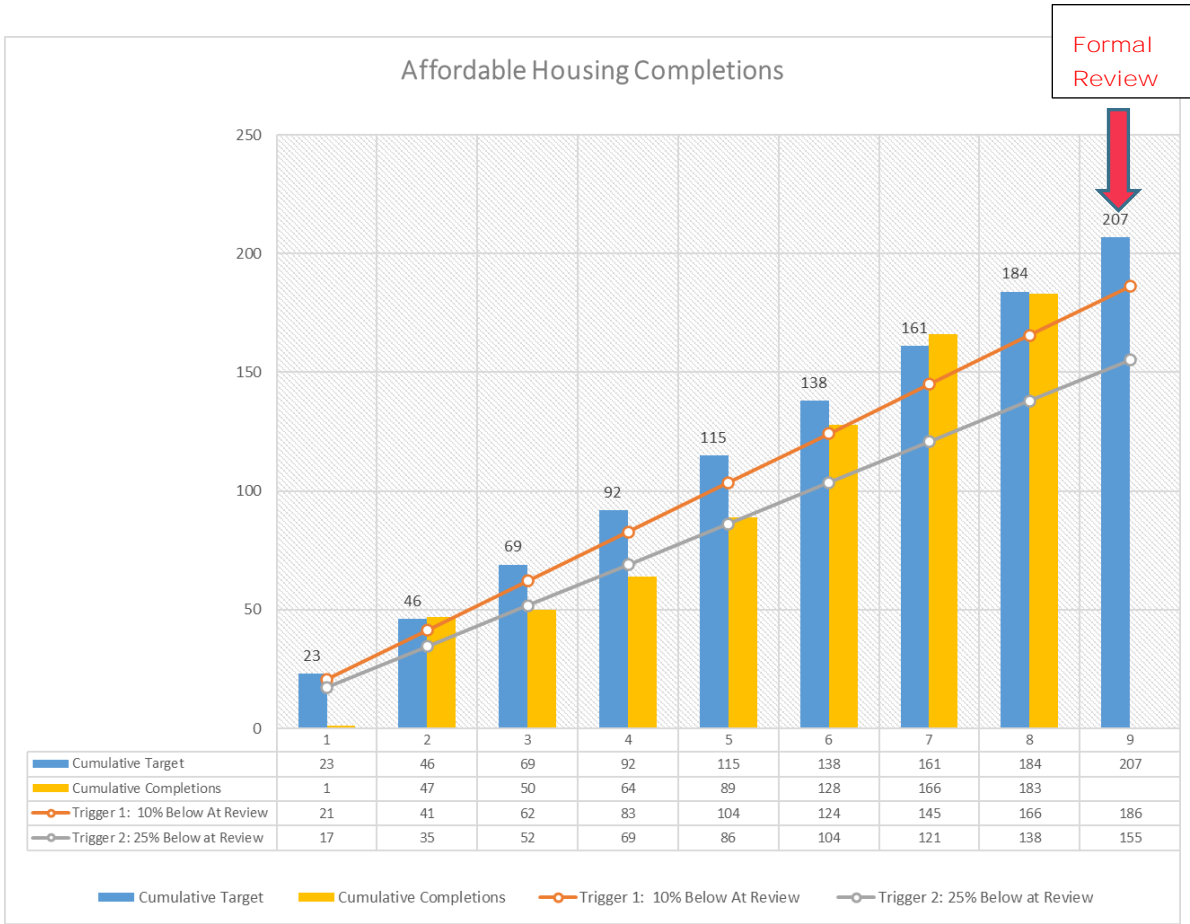
<sup>20</sup> Local Housing Market Assessment July 2021 <https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base>

## Affordable Housing Development

INDICATOR 23
<b>POLICY 47, POLICY 48, POLICY 49 - THE NUMBER OF NET ADDITIONAL AFFORDABLE DWELLINGS BUILT</b>
<b>TARGET: 362 AFFORDABLE DWELLINGS BUILT OVER THE PLAN PERIOD</b>
<b>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.</b>
<b>COMPLETIONS 25% LESS THAN TARGETS – DETERMINE ACTIONS TO INCREASE SUPPLY OF AFFORDABLE HOUSING, INCLUDING CONSIDERATION OF ADDITIONAL HOUSING ALLOCATIONS.</b>

- 3.33 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**.
- 3.34 Performance to date is from the base date of 2015 and shows the overall cumulative performance is on target as at April 2023.

	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	
Year 8	2022-2023	23	184	166	138	17	183	99%	Continue Monitoring	



3.32 Affordable housing completions will continue to be monitored to the review period 2024. Sites are also mapped on our website. <sup>21</sup>

**INDICATOR 24**

**POLICY 46, POLICY 47, POLICY 50 THE NUMBER OF NET ADDITIONAL DWELLINGS BUILT<sup>22</sup>**

**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.**

<sup>21</sup> [Local Development Plan Annual Monitoring \(arcgis.com\)](https://www.pembrokeshire.gov.uk/development-planning/local-development-plan-annual-monitoring)

<sup>22</sup> 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).

3.35 Housing completion rates overall are above the cumulative target at this point – April 2023. 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.<sup>23</sup>

	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	37	152	95%	99%	Continue Monitoring	●
Year 4	2018-2019	57	211	190	158	67	219	118%	104%	Continue Monitoring	●
Year 5	2019-2020	72	283	255	212	77	296	107%	105%	Continue Monitoring	●
Year 6	2020-2021	62	345	311	259	103	399	166%	116%	Continue Monitoring	●
Year 7	2021-2022	62	407	366	305	92	491	148%	121%	Continue Monitoring	●
Year 8	2022-2023	62	469	422	352	35	526	56%	112%	Continue Monitoring	●

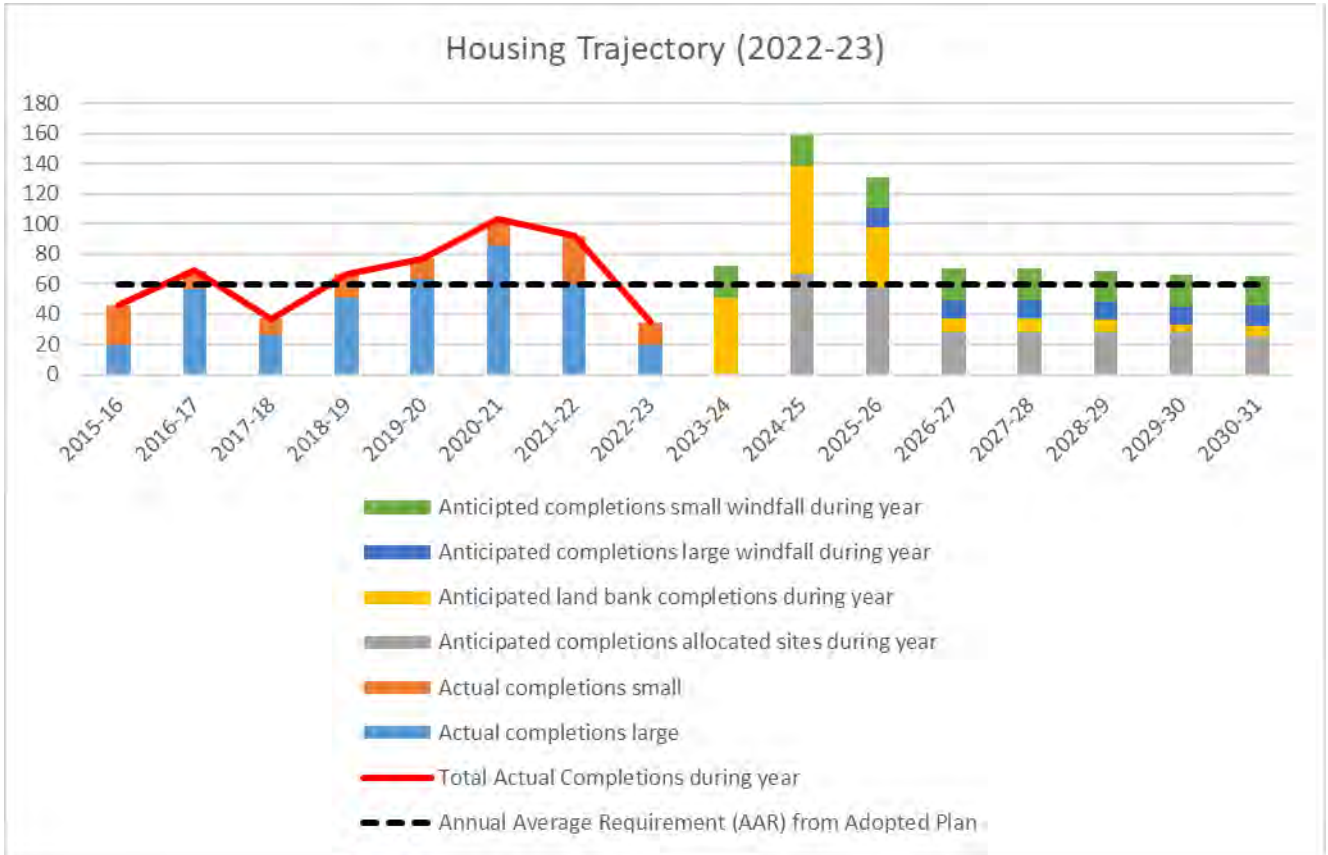


3.36 In March 2020, the Welsh Government published the Development Plans Manual (Edition 3), which introduced a requirement for this Authority’s Annual Monitoring Report to include an up-to-date Housing Trajectory and to compare the actual delivery of housing against the AAR (Annual Average Requirement).

3.37 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. There have been fewer completions than









<sup>23</sup> [Local Development Plan Annual Monitoring \(arcgis.com\)](https://arcgis.com)

anticipated in the period 2022-2023, but all of those anticipated for completion are under construction and cumulative completions are above the cumulative target.




**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	26	51	64	86	60	19								
Actual completions small	27	12	11	16	13	17	32	16								
Anticipated completions allocated sites during year									0	67	58	28	28	28	28	25
Anticipated land bank completions during year									51	71	40	9	9	8	5	7
Anticipated completions large windfall during year									0	0	12	12	12	12	12	14
Anticipated completions small windfall during year									21	21	21	21	21	21	21	19
Total Actual Completions during year	46	69	37	67	77	103	92	35								
Anticipated Annual Build Rate (AABR) from Adopted Plan									72	159	131	70	70	69	66	65
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	37	-23	-38%	180	152	-28	-16%	Continue Monitoring	
2018 -2019	60	67	7	12%	240	219	-21	-9%	Continue Monitoring	
2019-2020	60	77	17	28%	300	296	-4	-1%	Continue Monitoring	
2020-2021	60	103	43	72%	360	399	39	11%	Continue Monitoring	
2021-2022	60	92	32	53%	420	491	71	17%	Continue Monitoring	
2022-2023	60	35	-25	-42%	480	526	46	10%	Continue Monitoring	



3.38 More information on the phasing and delivery of sites for 2023 is provided at the end of the Annual Monitoring Report.

INDICATOR 25
<b>POLICY 47, POLICY 48 HOUSE PRICES, BUILD COSTS, AFFORDABLE RENTS</b>
<b>TARGET: TARGETS FOR AFFORDABLE HOUSING DELIVERY FOR EACH LOCAL MARKET HOUSING AREA ARE MAINTAINED</b>
<p><b>THE FOLLOWING KEY INDICATORS WILL BE MONITORED:</b></p> <p><b>A) HOUSE PRICES – DATA WHICH INCLUDES SECOND HAND AS WELL AS NEW PROPERTIES AND PROVIDES A ROBUST INDICATOR OF PRICE TRENDS.</b></p> <p><b>B) BUILD COSTS – PEMBROKESHIRE BENCHMARK BUILD COSTS AND RELEVANT BCIS INDEX; AND,</b></p> <p><b>C) AFFORDABLE RENTS – LOCAL HOUSING ALLOWANCE DATA.</b></p> <p><b>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</b></p> <p><b>A) THERE IS A PLUS OR MINUS CHANGE OF BETWEEN 5-9% IN ANY TWO INDICATORS SUSTAINED OVER A 12 MONTH PERIOD; OR,</b></p> <p><b>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.</b></p> <p><b>THE AUTHORITY WILL CONSIDER IF CHANGES ARE NEEDED AND WHETHER THIS WOULD REQUIRE A SELECTIVE REVIEW IN ADVANCE OF THE 4-YEARLY FORMAL REQUIREMENT.</b></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 <del>Pembrokeshire</del> <u>Dyfed</u> . <sup>24</sup> 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.	



<sup>24</sup> Geography for this data is Dyfed and not Pembrokeshire – error in 2021-22 Report

2022-2023	(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 that tender prices in 1Q 2023 rose by 8.6% on an annual basis taken from the same time last year (Dyfed data). House prices at a national level (Wales) and at a Pembrokeshire level show a range of change. Given the likely house price differences between the National Park and other areas in Wales and Pembrokeshire the Authority has also carried out a refined analysis of post codes which include the National Park. The percentage change using mean calculation = +15.23% and median change = +11.11%.	Continue Monitoring	Performance is now above Trigger point 1 and also Trigger point 2. However, the increase in build costs is less than the higher house prices. This would indicate that that the affordable housing requirements in each local market housing area can be maintained.	
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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.	
2022-2023	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.	
2022-2023	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.	
2022-2023	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
<b>2021-2022</b>	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.	
<b>2022-2023</b>	20% of completions in the Countryside	90% of completions are in Plan's Centres	Just under 69% of completions were in the Countryside	Continue Monitoring	Performance remains below the Trigger point. See commentary below.	

**Analysis:** The figures for 2022-23 show that the number of completions in the Countryside has increased to just under 69% of overall completions (22 dwellings). The strategy to control development in the countryside has not been undermined however, as 17 dwellings were granted permission as an Affordable Housing Exception Site, having satisfied the policy criteria (Policy 49 Affordable Housing Exception Sites). In addition, 1 completion constituted legacy infill and rounding off opportunities granted under Local Development Plan 1, and a further 2 constituted conversions of appropriate buildings in the countryside (Policy 7 Countryside).

<b>INDICATOR 30</b>
<b>POLICY 52 TENURE OF AFFORDABLE HOUSING</b>
<b>TARGET: 80% OF AFFORDABLE HOUSES PERMITTED ARE AFFORDABLE RENTED PROPERTIES</b>
<b>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.</b>

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	
2022/23	17	17	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



- 3.39 **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 2022<sup>25</sup> and 'Together for Retail': a Wales retail Forum action plan in May 2023<sup>26</sup>. Welsh High Street vacancy rates were 16.3% in the last quarter of 2022, a reduction from 16.9% in the first quarter of 2022. The vacancy rate in Wales is the second highest of any nation or region of Great Britain<sup>27</sup>. These vacancy rates are not reflected in the National Park's Retail Centres, most of which have vacancy rates well below 10%. See Indicator 34 below.
- 3.40 **Community Infrastructure Levy:** There are no plans at present to pursue a Community Infrastructure Levy in Pembrokeshire.



<sup>25</sup> [A shared strategic vision for the retail sector | GOV.WALES](#)



<sup>26</sup> [Retail action plan | GOV.WALES](#)



<sup>27</sup> Welsh Retail Consortium figures.

## 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.	
2022-2023	1	0	0	Continue Monitoring	Performance remains below the Trigger point.	

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.	
2022-2023	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.	
2022-2023	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.	
2022-2023	Greater than 10% for 2 consecutive years	Less than 10%	Overall vacant floorspace = 7.8%	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
2021-2022	5.7%	8.7%	3.2%	0%	0.7%
2022 - 2023	7.8%	13% <sup>28</sup>	3.2%	0%	2.4%

<sup>28</sup> The vacant floorspace in Tenby relates to 19 vacant properties. 5 of these are undergoing active refurbishment with occupation of premises imminent. 2 vacant units are within the Market Hall and 2 relate to a major high street brand collapse – retail survey carried out June 2023.

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.	
2022-2023	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 (\* in the table below).**

**TRIGGER: 1 OR MORE GUIDANCE DOCUMENTS NOT ADOPTED**

















Status	Count	March 2023
Adopted	24 <sup>29</sup>	
Consultation	2	
Being drafted/redrafted	3	
Interim/rolled over	5	
Later/Stalled	3	

Title	Current Status – Annual Monitoring Report 2022	Status
<b>Affordable Housing</b>	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.	
<b>Archaeology</b>	Adopted May 2021 (with PCC)	
<b>Biodiversity</b>	Adopted May 2021 (with PCC)	
<b>Caravan, Camping and Chalet</b>	Adopted May 2021	
<b>Coal Works – Instability</b>	Adopted Oct 2022	
<b>Conservation Areas</b> <sup>30</sup>	Adopted October 2022	
<b>Landscape</b>	Adopted June 2011 Interim Supplementary Planning Guidance Local Development Plan 2 – September 2020	

<sup>29</sup> Includes 13 Conservation Area documents

<sup>30</sup> Angle, Caerfarchell, Caldey Island, Little Haven, Manorbier, Newport and Newport Parrog, Portclew, Porthgain, Saundersfoot, Solva, St David's Trefin, Tenby.



Title	Current Status – Annual Monitoring Report 2022	Status
	Implementing Interim Guidance until LANDMAP updates received.	
<b>Lighting</b>	New - Research undertaken will inform drafting of the Guidance.	
<b>Loss of Community Facilities</b>	New - clarification needed as to the role of the Guidance.	
<b>Loss of Hotels</b>	Interim Supplementary Planning Guidance Local Development Plan 2 – September 2020. Consultation completed. Reporting to NPA Summer 2023	
<b>Parking</b>	Adopted May 2021	
<b>Planning Obligations</b>	Interim Supplementary Planning Guidance Local Development Plan 2 –September 2020 (with PCC) Review will be led by Pembrokeshire County Council	
<b>Recreation</b>	Very little management of damaging activities can be achieved through land use planning. The potential role of supplementary planning guidance will continue to be explored.	
<b>Regionally Important Geodiversity Sites</b>	Adopted October 2022	
<b>Renewable Energy</b>	Adopted May 2021	
<b>Safeguarding Mineral Zones</b>	Adopted October 2022	
<b>Seascape Character</b>	Interim Supplementary Planning Guidance Local Development Plan 2 – September 2020 with PCC). Published for consultation post NPA October 22. Reporting to NPA Summer 2023	 
<b>Shopfront Design</b>		
<b>Sustainable Design &amp; Development<sup>31</sup></b>	Adopted May 2021	
<b>The Cumulative Impact of Wind Turbines</b>	Adopted October 2022	
<b>Place Plans: – Community Land Trust</b>	Adopted May 2021	
<b>Tree and Woodland Guidance</b>	New - Consultation commenced post NPA October 22. Reporting to NPA Summer 2023	

<sup>31</sup> Amalgamates Siting and Design of Farm Buildings and Sustainable Design

## EFFECTIVENESS OF POLICY AND GUIDANCE AT APPEAL

3.41 In the period April 2022 to March 2023 there were five appeal decisions against refusals for planning permission. Three of these were allowed and two were dismissed.

Application Details	Reasons for Refusal	Appeal Decision <sup>32</sup>
<b>NP/21/0236/FUL – Change of Use of garden workshop to holiday let</b>	<p>Delegated Refusal:</p> <p>The proposal would constitute over development of the site and would have an adverse amenity impact for neighbouring residential properties especially from noise, light and traffic from visitors. The proposed use would be out of character with normal use of a garden area and therefore contrary to Policy 30 (Amenity).</p> <p>In addition, the workshop was not considered an appropriate building under Policy 40 (Self-Catering Development) for holiday letting purposes.</p>	<p><b>CAS-01457-P8H4B3</b></p> <p><b>Dismissed 04/04/2023</b></p> <p>Inspector considered there would be no conflict with Policy 40 as it constituted holiday accommodation within an existing holiday / tourist centre and was not a building appropriate for market or affordable housing. However, this would not outweigh the harm or conflict with LDP Policy 30.</p>
<b>NP/21/0236/FUL: The dismissal of the appeal citing Policy 30 shows this policy is performing effectively. The appeal decision does not dispute the appropriateness of Policy 40.</b>		
<b>NP/21/0106/FUL – Proposed Change of Use of stables to tourism accommodation</b>	<p>Delegated Refusal:</p> <p>The stables building was not considered an appropriate building for conversion and was therefore contrary to Policy 7 (Countryside)</p>	<p><b>CAS-01538-P5L2M2</b></p> <p><b>Dismissed 11/05/2022</b></p> <p>Inspector concluded that the proposal failed to comply with planning policies relating to the countryside and conversion of buildings (Policy 7).</p>
<b>NP/21/0106/FUL: The dismissal of the appeal citing Policy 7 shows this policy is performing effectively.</b>		
<b>NP/21/0151/FUL: Alterations and extensions to dwelling to raise roof to create first floor accommodation.</b>	<p>Delegated Refusal:</p> <p>The proposal was considered inappropriate in scale thereby having an overbearing impact on amenity space.</p> <p>Proposal considered contrary to Policies 1 (National Park Purposes and Duty),6 (Rural</p>	<p><b>CAS-01723-X8P5V7</b></p> <p><b>Allowed 06/09/2022</b></p> <p>Inspector concluded that there was no conflict with the Policies</p>

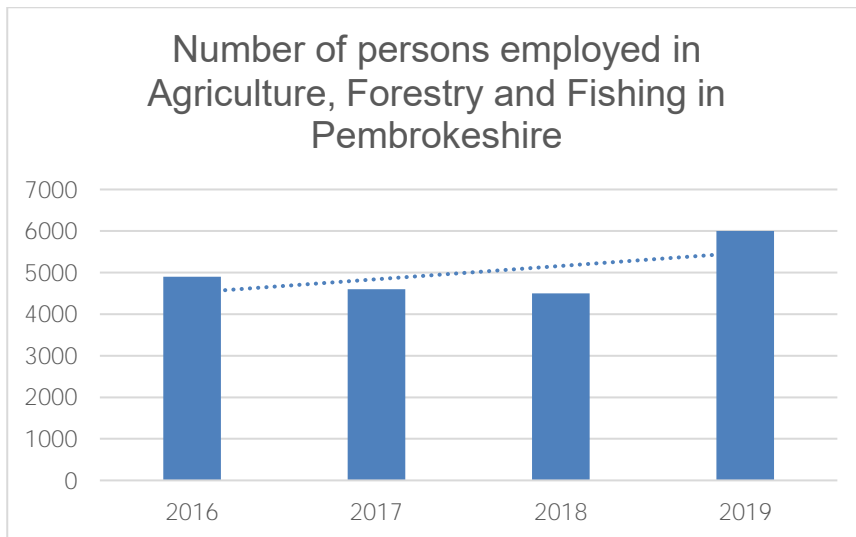
<sup>32</sup> [Search for a case - Planning Casework \(gov.wales\)](#)

Application Details	Reasons for Refusal	Appeal Decision <sup>32</sup>
	Centres),8 (Special Qualities),9 (Light Pollution),14 (Conservation of the Pembrokeshire Coast National Park),29 (sustainable Design and 30 (Amenity).	
<p><b>NP/21/0151/FUL: The Inspector concluded that there was no conflict with the policies. The appeal decision does not dispute the appropriateness or effectiveness of the policies and there is no evidence to suggest the policies would require a review.</b></p>		
<p><b>NP/21/0815/FUL: Erection of decking in rear garden (retrospective)</b></p>	<p>Delegated Refusal: The decking was considered insensitively and unsympathetically sited within the special landscape of the National Park and was therefore contrary to Policies 8 (Special Qualities), 14 (Conservation of the Pembrokeshire Coast National Park), 29 (Sustainable Design) and 30 (Amenity)</p>	<p><b>CAS-01756-N5Y6R5</b> <b>Allowed 07/09/2022</b> The Inspector concluded that the decking was entirely appropriate to its setting at the rear of the property and does not have a detrimental impact on the special qualities, nor was there conflict with the other policies.</p>
<p><b>NP/21/0815/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 effectiveness of the policies. There is no evidence to suggest the policies would require a review.</b></p>		
<p><b>NP/22/0003/PNA: Erection of polytunnel with metal frame to house 370 laying hens throughout winter months.</b></p>	<p>Delegated Refusal: The proposed position and proposed material would have an adverse visual impact on the surrounding landscape and therefore the proposal would be contrary to Policy 14 (Conservation of the Pembrokeshire Coast National Park).</p>	<p><b>CAS-01742-Z5T0Q5</b> <b>Allowed 11/11/2022</b> The Inspector concluded that, taking account of the siting, design and external appearance, there would be no significant or unacceptable adverse impact on the visual amenity of the surrounding landscape or on the special qualities of the National Park and therefore no conflict with Policy 14.  An appeal for costs was dismissed.</p>
<p><b>NP/22/0003/PNA: The Inspector considered that there would be no conflict with Policy 14. The appeal decision does not dispute the appropriateness or effectiveness of the policy. There is no evidence to suggest the policies would require a review.</b></p>		

## 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 workplace 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.	-
2022 - 2023	Continue Monitoring	Further data is required to make conclusions – latest data included.	-



Workplace employment by industry and area ([Stats Wales](#)) – Data accessed 02/08/2023

**SUSTAINABILITY OBJECTIVE 2**

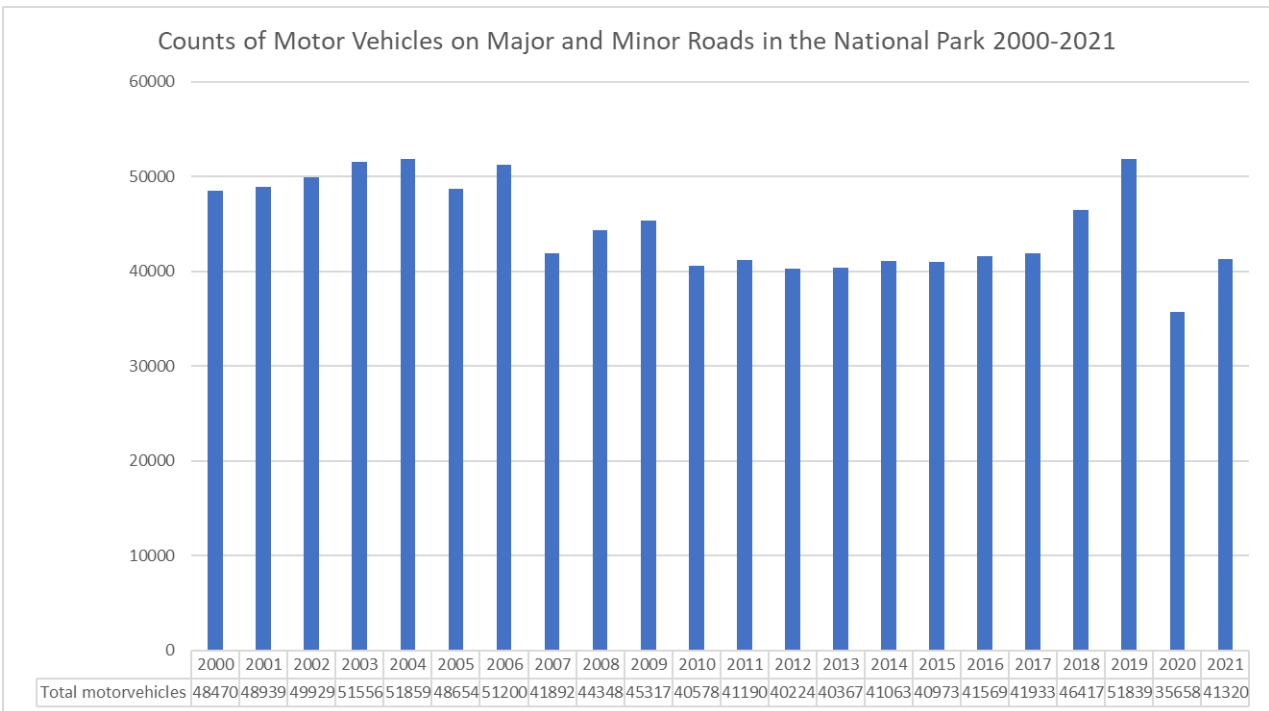
**Locate developments so as to minimise the demand for travel, especially by private car**

COMMENTARY:

Traffic counts from the Department for Transport (2000 – 2021) for survey locations within the National Park show that between 2010 and 2017, traffic levels remained much the same. 2018 – 2019 figures may indicate that traffic levels were returning to pre-2006 levels. However, due to the COVID19 pandemic, 2020 had the lowest traffic levels experienced in the last 20 years and 2021 appears to show a return to the level experience between 2010 and 2017. 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.	
2022-2023	Continue Monitoring	Performance remains acceptable.	



[Department for Transport Traffic Counts](#) – Data accessed 16/06/2023

**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 three applications have been approved contrary to officer recommendation during this monitoring period. The nature of the contrary approvals concerns multiple LDP2 policies but primarily Policy 8 (Special Qualities) and Policy 35 (Coastal Change Management Area).

Indicator 14 concerns the application of the Renewable Energy policy and Supplementary Planning Guidance 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 Supplementary Planning Guidance.

**CONCLUSION:** Performance here is concerning, because for the second year in a row applications contrary to Policy 8 (Special Qualities) have been approved. During this period two such applications for the same location have been permitted. Additionally, an application for development in a C2 flood zone has also been permitted contrary to Local Development Plan and National Policy. Whilst small in number, applications that are contrary to Policy 8 (Special Qualities) if sustained over the lifetime of the plan will result in the degradation of the special qualities of the National Park. Additionally, allowing development within flood zones will impact negatively on the sustainability of communities within the National Park in the long term.

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.	
2022-2023	Training 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.	
2022-2023	Continue Monitoring	Performance remains acceptable.	

**SUSTAINABILITY OBJECTIVE 5**

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

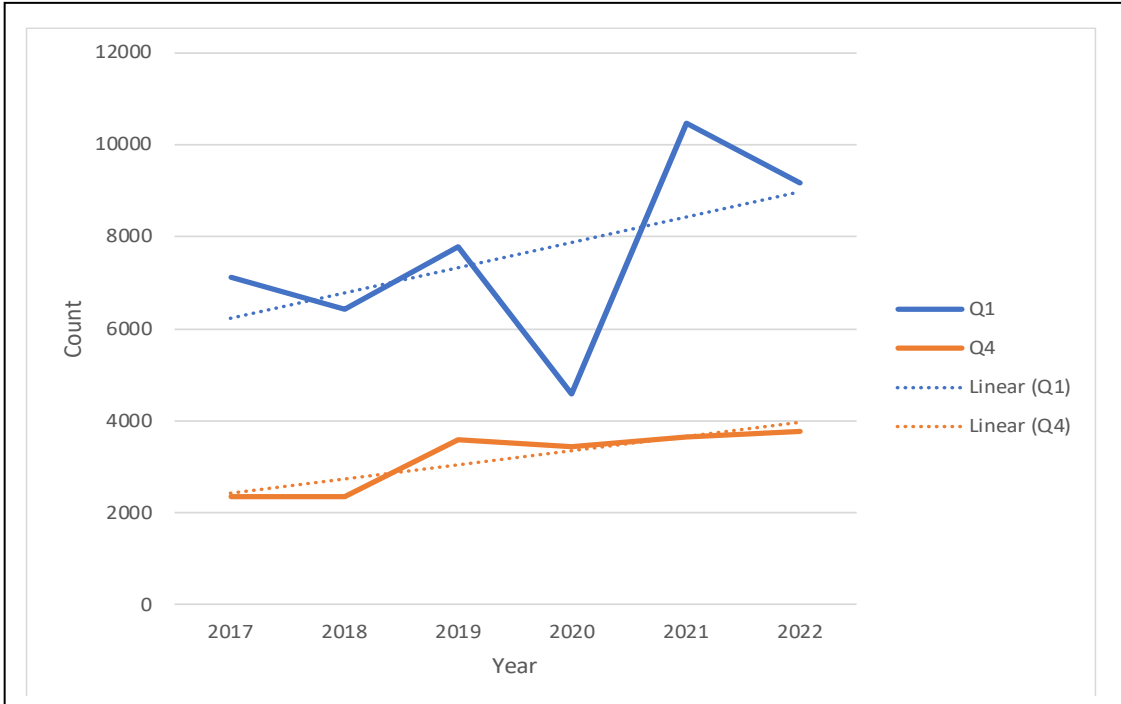
**COMMENTARY:**

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 the development of facilities for visitors. No recreational development has been approved during this monitoring period contrary to Policy 38.

Footpath counters for the combined footpath network in the national park indicate a trend of gradual increase in use outside of peak season (Q4) that has continued into the 2022-23 financial year. Peak use (Q1) shows pronounced increases and decreases between 2019 and 2020 going into 2021, which are likely due to the COVID19 pandemic.

Year	Action	Analysis	Overview
2021 – 2022	Continue Monitoring	Further data is required to make conclusions – latest data included.	-
2022 – 2023	Continue Monitoring	Further data is required to make conclusions – latest data included.	-

Footpath Counter Data



**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 two applications were permitted in a C2 flood zone during this monitoring period (see page 21 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	⦿
2022-2023	Training Required.	Performance here is of concern	⦿





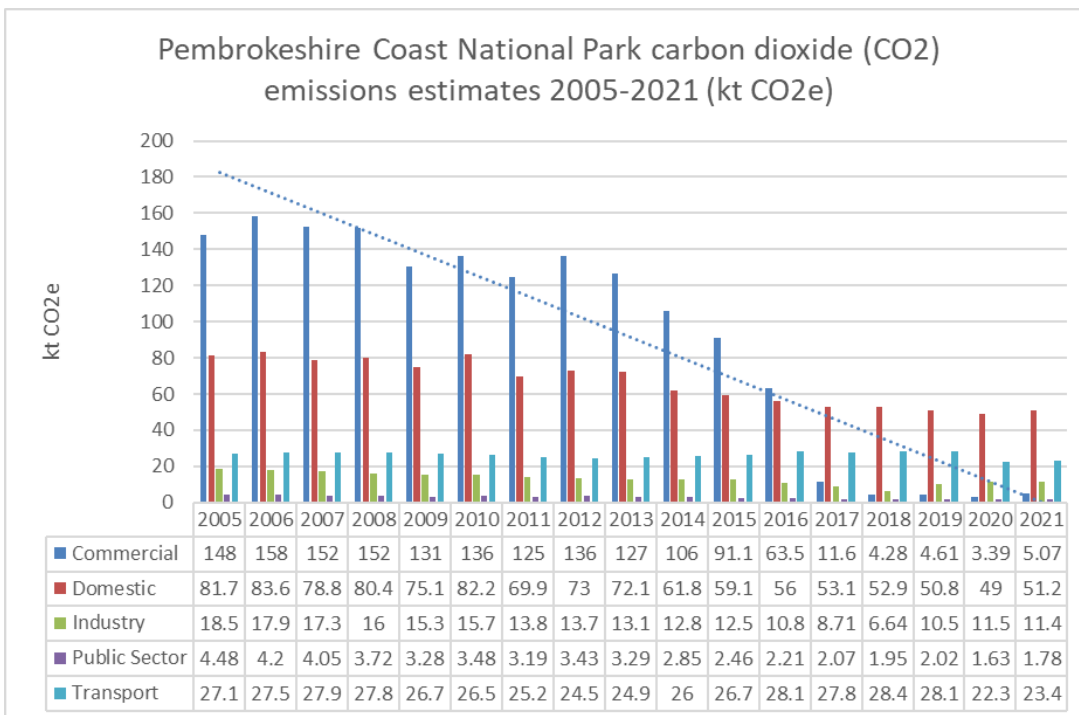
**SUSTAINABILITY OBJECTIVE 7****Reduce factors contributing to climate change.****COMMENTARY:**

The most recent estimates of Carbon Dioxide emissions for National Parks by the Department for Energy Security and Net Zero show that the largest sources within the scope of influence of the Local Development Plan in the Pembrokeshire Coast National Park are, and have historically been, commercial, domestic, industry, public sector, and transport. The levels emissions across these sectors have remained much the same since 2016, with the exception of Commercial, which declined dramatically after 2016.

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
<b>2021- 2022</b>	Continue Monitoring	Performance remains acceptable.	
<b>2022-2023</b>	Continue Monitoring	Performance remains acceptable.	





Emissions source: [2005 to 2019 local authority carbon dioxide \(CO<sub>2</sub>\) emissions dataset \(revised\) - Datasets - Integrated Data Service \(gss-data.org.uk\)](#) - Data accessed 17/07/2023

**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 cumulative progress towards the Local Development Plan targets for affordable housing.

Year	Action	Analysis	Overview
2021- 2022	Continue Monitoring	Performance remains acceptable.	
2022-2023	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 a range of holiday accommodation types that suit all budgets.

Indicators 23 and 30 indicate reasonable progress towards the Local Development Plan targets for housing.

Year	Action	Analysis	Overview
2021- 2022	Continue Monitoring	Performance remains acceptable.	
2022-2023	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).

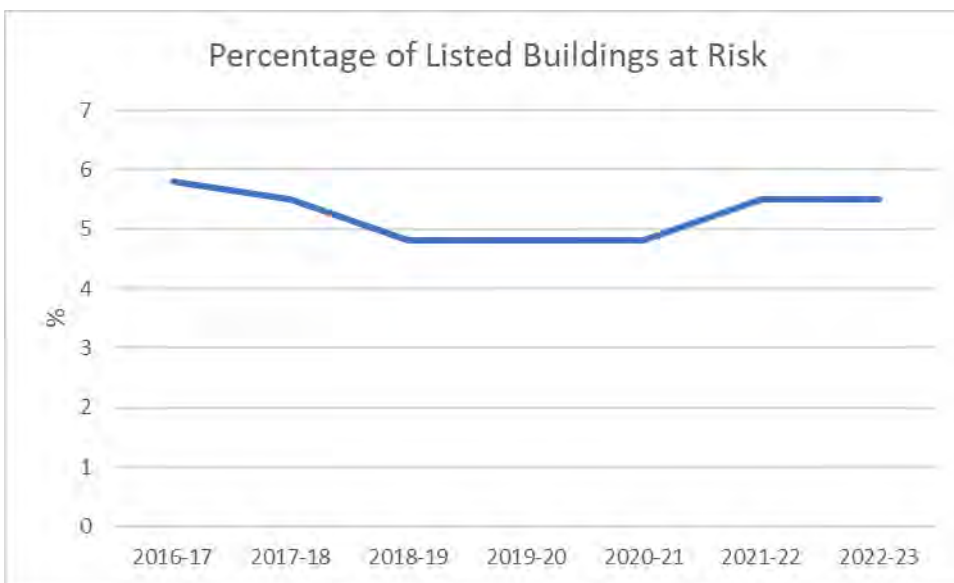
Secondly, the Local Development Plan will be able to contribute to the objective by helping to maintain and enhance culturally significant built environment and natural environment features.

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 2022 and 31st March 2023 two 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.	
2022-2023	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.	●
2022-2023	Continue Monitoring	Performance remains acceptable.	●



**SUSTAINABILITY OBJECTIVE 12**

**Reduce the negative impacts of waste.**



**COMMENTARY**

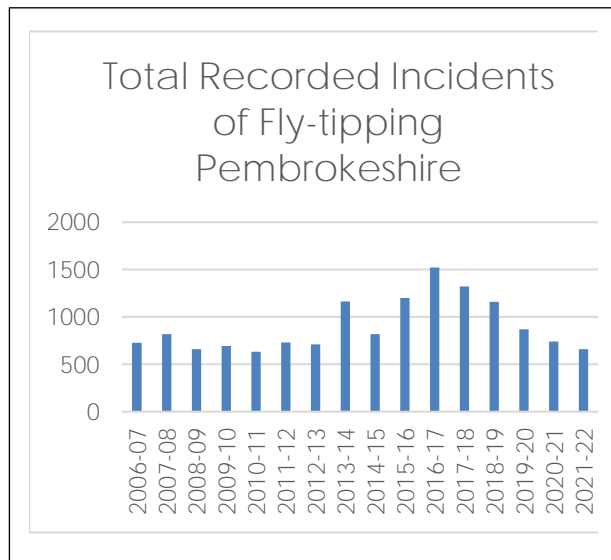
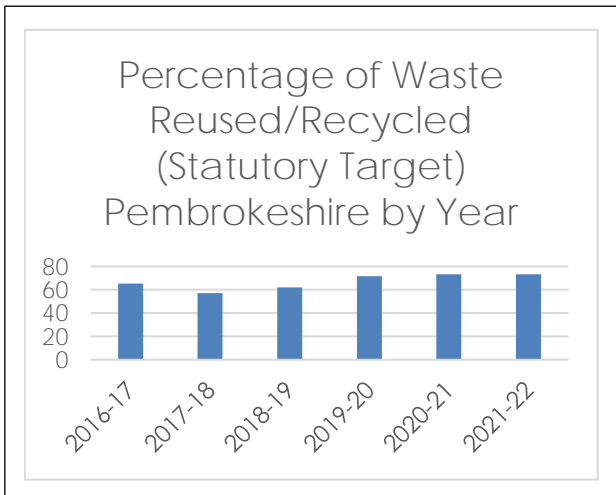
Policies 27 and 28 make allowances for waste management and composting facilities to be created that benefit communities in the national park subject to the location being appropriate. No applications contrary to these policies (see indicator 10) have been approved during this monitoring period.

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.

The incidence of fly-tipping has decreased year on year since 2017.

Year	Action	Analysis	Overview
<b>2021 - 2022</b>	Continue Monitoring	Performance remains acceptable.	
<b>2022- 2023</b>	Continue Monitoring	Performance remains acceptable.	



Annual reuse/recycling/composting rates by local authority ([Stats Wales](#)) – Data Accessed 17/07/23



Recorded fly-tipping Incidents ([Stats Wales](#)) – Data accessed 17/07/23

**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.

Year	Action	Analysis	Overview
2021- 2022	Continue Monitoring	Performance remains acceptable.	
2022- 2023	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.

294 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.	
2022- 2023	Continue Monitoring	Performance remains acceptable.	

**Biodiversity Enhancements**

Total to AMR Period

Increase this year

**294**  
▲ 174



**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 Conservation<sup>33</sup>

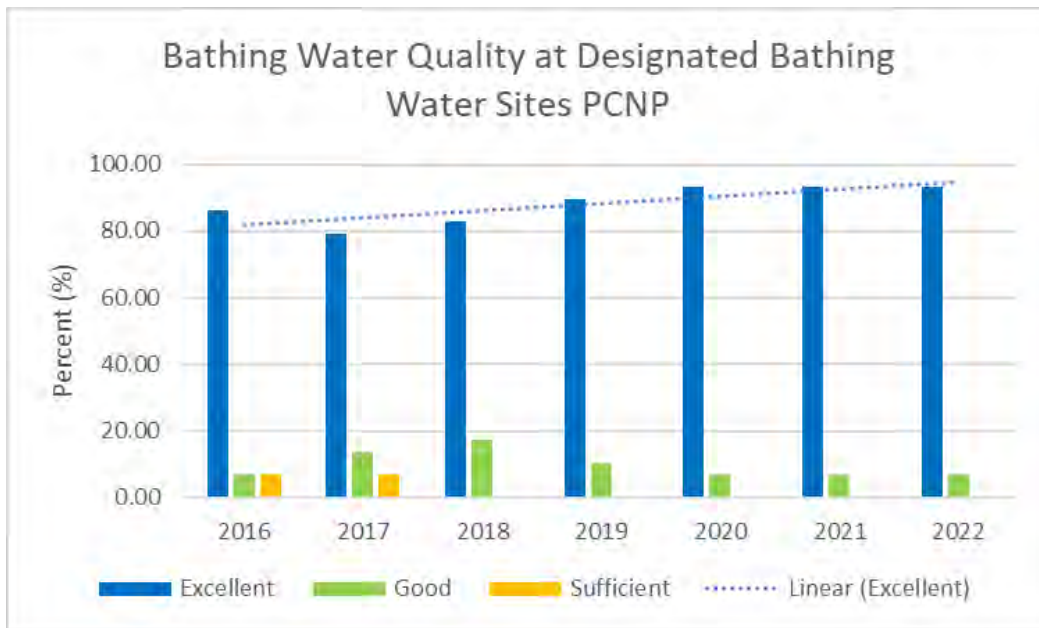
In January 2021 NRW published a report in which it presented its assessment of how much phosphorus there is in SAC rivers measured against revised water quality targets. The evidence review showed that over 60% of the water bodies assessed in SAC river catchments were failing to meet the revised water 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.

No change in bathing water quality between 2021 and 2022, remains predominantly excellent for designated beaches throughout the National Park.

Year	Action	Analysis	Overview
2021- 2022	Continue Monitoring	The strategy of the Plan is not affected by current issues with phosphorous elsewhere in Pembrokeshire.	
2022-2023	Continue Monitoring	Situation remains the same as previous years monitoring.	

<sup>33</sup> [Natural Resources Wales / Advice to planning authorities for planning applications affecting phosphorus sensitive river Special Areas of Conservation](#)



Bathing Water Quality at Designated Beaches ([DataMapWales](#)) – Accessed 20/07/23



## 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'<sup>34</sup> 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.** As at mid-August 2023 data at a Community level is not available to compare.

## HOUSEHOLDS WITH 'NO USUAL RESIDENT'<sup>35</sup>:

### 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 household 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

<b>Community</b>	<b>Percent no usual resident</b>	<b>Within the National Park?</b>
Lamphey	48.2	Partly
Newport	37.3	In
The Havens	35.5	Partly
Dale	33.3	In
Marloes & St Brides	31.9	In
Dinas Cross	29.5	In
Saundersfoot	28.6	In
Pencaer	28.4	Partly

<sup>34</sup> <https://www.pembrokeshirecoast.wales/wp-content/uploads/2019/12/Exam111-HS1-AP10.pdf>

<sup>35</sup> 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'.

<b>Community</b>	<b>Percent no usual resident</b>	<b>Within the National Park?</b>
<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 &amp; 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% used by Gwynedd and Anglesey). 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 and 2023.

<b>Community</b>	<b>Percentage of homes subject to the second homes council tax premium 2019 (25% or more highlighted)</b>	<b>Percentage of homes subject to the second homes council tax premium 2021(25% or more highlighted)</b>	<b>Percentage of homes subject to the second homes council tax premium 2022 (25% or more highlighted)</b>	<b>Percentage of homes subject to the second homes council tax premium 2023 (25% or more highlighted)</b>	<b>Reduction in Numbers of Properties 2022 to 2023</b>
<b>Caldey</b>	26%	35%	30%	Below 25% (17%)	↓ from 7 to 4
<b>Dale</b>	34%	32%	36%	35%	↓ from 50 to 48
<b>Newport</b>	26%	25%	25%	Below 25% (24%)	↓ from 189 to 180
<b>The Havens</b>	29%	30%	31%	26%	↓ from 228 to 190

**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 under the Council Tax system.

**Dale** shows a small percentage increase overall. No completions have been recorded for the Community Council area for the period 2019 to 2023.

There has been a small decline in the percentage shown as Second Homes in **Newport** between 2019 and 2023.

In **The Havens**, where there has been an increase from 29% to 31% by 2022 but then a decline to 26% overall in 2023.

There have been completions of both market dwellings and affordable housing in Broad Haven. Council Tax records are now available to the Authority for individual property addresses within Centres in the National Park but not in the remainder of the Community and Town Council areas yet. The information available for Broad Haven shows that recent completions that are not affordable housing are showing significant numbers of second homes and holiday lets.

### 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 for 2023 are that overall counts of community facilities are stable. However, there were five local shops identified as closed. Online research identified one owner as advising that it was down to cost-of-living issues along with a combination of factors. The Authority does not have any information regarding the other closures. The Association of Convenience Shops for Wales more generally refers to issues such as energy, employment and supply chain costs and are finding it difficult to hold back further price increases for consumers.<sup>36</sup>

### Schools and School Occupancy Levels

An update was provided by Pembrokeshire County Council in August 2023:

The Authority has been advised that there are a number of schools which have catchments within the National Park area.

*'A number of schools have significant surplus places and are well placed to be able to accommodate any additional pupil yield from new housing; these include, Ysgol Llanychllwydog, Ysgol Bro Inqli, St Dogmael's CP, Ysgol Eglwysrwrw, Coastlands CP, Stepside CP and Saundersfoot CP. In the case of the latter two schools, there is likely to be pressure arising from proposed housing in the Tenby area, but this should be comfortably met from within existing capacity. Lamphey CP School currently has sufficient capacity and has historically attracted the vast majority of its pupils from out of catchment.*

*Conversely, Ysgol Penrhyn Dewi VA School (St David's) is at capacity.'*

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 Examination<sup>37</sup> (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*

<sup>36</sup> [https://cdn.acs.org.uk/public/acs\\_cost\\_of\\_trading\\_report\\_june\\_2022.pdf](https://cdn.acs.org.uk/public/acs_cost_of_trading_report_june_2022.pdf)

<sup>37</sup> 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>

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 Eglwysrwr 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 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.*

<i>School</i>	<i>National Park Communities (within or partly within catchment)</i>
<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 &amp; 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 &amp; 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. This is because of significant changes in the Council Tax system over recent years. The availability of records for individual properties at the end of the calendar year 2022 has provided more information to assist in the role land use

planning can play in addressing any issues arising regarding second and holiday homes.<sup>38</sup>

- With regard to community facilities there is no clear indication that there has been a deterioration in general in the range of facilities in Centres. A decline in the number of local shops is identified with the possibility that the reasons behind it are associated with the cost-of-living crisis more generally.
- The situation regarding schools and schools occupancy doesn't identify issues related to second and holiday homes. With the availability of Council Tax data the Authority has also the ability to consider the likelihood of new development being occupied as second and holiday homes. This is now generally part of the appraisal of planning applications coming forward in Centres.<sup>39</sup>

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 this being considered by the Authority – see Context section at the beginning of the Visitor Economy, Employment and Rural Diversification Chapter.

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<sup>38</sup> [https://www.pembrokeshirecoast.wales/wp-content/uploads/2023/03/08\\_23-Planning-Policy-Changes-re-Second-Homes-and-Short-term-lets.pdf](https://www.pembrokeshirecoast.wales/wp-content/uploads/2023/03/08_23-Planning-Policy-Changes-re-Second-Homes-and-Short-term-lets.pdf)

<sup>39</sup> [https://www.pembrokeshirecoast.wales/wp-content/uploads/2023/03/08\\_23-Planning-Policy-Changes-re-Second-Homes-and-Short-term-lets.pdf](https://www.pembrokeshirecoast.wales/wp-content/uploads/2023/03/08_23-Planning-Policy-Changes-re-Second-Homes-and-Short-term-lets.pdf)



## APPENDIX 2 THE TIMING AND PHASING OF SITES WITH PLANNING PERMISSION

Settlement Tier	Site Name	Total Site Capacity	Completions	U/C	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
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	16		21	21							
St. Davids (Tier 2)	Adjacent Ysgol Bro Dewi (NP/18/0488/OUT)	11				5	6						
Jameston (Tier 3)	Green Grove (NP/15/0287/OUT)	9	8		1								
Jameston (Tier 3)	Opposite Bush Terrace (NP/18/0610/FUL)	38				11	10	4	4	3	3	3	
Lawrenny (Tier 3)	Adjacent Home Farm (NP/18/0622/FUL)	39			13	13	13						
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/21/0743/FUL)	15				4	3	2	2	2	1	1	
Countryside (Tier 4)	Blockett Lane, Little Haven (10/511)	6				2	1	1	1	1			
Countryside (Tier 4)	Boulston Manor, Uzmaston (04/400)	5											5
Countryside (Tier 4)	Rear of Caeglas, Whitchurch (05/509)	5	5										
Countryside (Tier 4)	Brynhir, Tenby (NP/19/0361/OUT)	144											144
Countryside (Tier 4)	North of Bay View Terrace, Dinas Cross (NP/19/0548/FUL)	17	17										
Countryside (Tier 4)	Buttyland (NP/19/0522/FUL) Outline for housing	14				3	4	2	2	2	1		
Countryside (Tier 4)	Land off Trewarren Road, St Ishmaels (NP/18/0396/OUT)	14											14
<b>Totals</b>		<b>634</b>	<b>239</b>	<b>0</b>	<b>51</b>	<b>71</b>	<b>40</b>	<b>9</b>	<b>9</b>	<b>8</b>	<b>5</b>	<b>7</b>	<b>195</b>



Rep No.	Reference	Representation	Officer Response and Recommendation
1.	2902 / Newport Town Council	The LDP2 Inspector asked in her Report, that additional contextual indicators be monitored, which were however not listed in the adopted LDP 2 under Chapter 5 “Monitoring”. These included not only Homes on the Council Tax database subject to the second home premium, but also the number of Households with No Usual Resident, thus recognising the significance of the latter indicator in maintaining community wellbeing and sustainability.	The monitoring indicators referred to are in relation to the Sustainability Appraisal Monitoring which are not part of the Local Development Plan document itself but the Sustainability Appraisal monitoring. This is what has been undertaken in the Annual Monitoring Report covering the topics referred to.
2.	2902 / Newport Town Council	LDP2 AMR1 relies on the 2011 Census, now 12 years out of date, to produce figures for Households with No Usual Resident. For Newport, this is given as 37.3%. Newport is the only Tier 2 Centre listed here, and unlike the other centres listed, which are all Tier 3, Newport supports a District Shopping Centre - which it struggles to do when a high proportion of households are non-resident, and most of those employed here commute into town. No Trigger figure is provided. What Trigger would lead to a Policy Review?	<p>The detailed data from the 2021 Census is awaited and therefore there isn't comparative data for this indicator at present.</p> <p>The advice of the Inspector was in terms of monitoring these matters: <i>‘This approach will ensure that any adverse effects arising from policies in the Replacement Plan are within acceptable limits, or where they are not, assist in identifying the remedial action that may be needed in future iterations of the LDP. ‘</i></p> <p>There isn't a definitive statistical threshold that will instantaneously trigger a review.</p> <p>Since the preparation of the Inspector's Report other quite significant changes in legislation and taxation approaches are underway which will need to be considered in any such review of the Plan on this matter. There are also changes in national planning policy expectations.</p> <p>The Authority is considering all these matters in anticipating of beginning the required formal review of Local Development Plan 2 in mid-2024.</p> <p>In the meantime, the Authority has resolved (National Park Authority March 2023<sup>1</sup>) to consider the implications of the new Use Class Order for the adopted Local</p>

<sup>1</sup> [https://www.pembrokeshirecoast.wales/wp-content/uploads/2023/03/08\\_23-Planning-Policy-Changes-re-Second-Homes-abd-Short-term-lets.pdf](https://www.pembrokeshirecoast.wales/wp-content/uploads/2023/03/08_23-Planning-Policy-Changes-re-Second-Homes-abd-Short-term-lets.pdf)

Rep No.	Reference	Representation	Officer Response and Recommendation
			Development Plan 2 when considering planning applications and to also consider the evidence base for making a decision on whether to pursue an Article 4 Direction.
3.	2902 / Newport Town Council	How has a threshold of more than 25% Second Homes been decided?	<p>This threshold was taken from the Background Paper prepared for the Local Development Plan Examination to show what other planning authorities were considering. This is the Paper that the Inspector used to consider her recommendation on the matter.</p> <p>The National Park Authority considered how other planning authorities had provided evidence for the policies used in those Authorities Local Development Plans. The link below provides more on the background.<sup>2</sup></p>
4.	2902 / Newport Town Council	<p>Of the Centres listed in LDP2 AMR1 as having a proportion of council tax premium payers exceeding this figure, Newport is again the only Tier 2 Centre. The proportion of 2nd homes by this measure is recorded as reducing in Newport. (This has reduced further since, and now stands at 24% according to PCC Enhancing Pembrokeshire), but the possible reason is the number of owners who have switched to business rates.</p> <p>The critical factor in terms of community sustainability of the proportion of Houses with No Usual Resident which will not be known until the 2021 Census results are received.</p>	Comments noted. It is a complex area of change. There are changes happening as suggested due to changing regimes in taxes being charged.
5.	2902 / Newport Town Council	<p>Under monitoring indicators at 3.4 it is stated that “continue monitoring” means “Development Plan policies are being implemented effectively”. Where these contextual indicators put forward by the Inspector are recorded in AMR1, there is no indication of Targets, or how policy will be affected if these Targets are exceeded. We understand that the aim of Newport Area Environment Group in calling for these indicators to be measured at the time of the LDP2 Examination, was to show the need for a Principal Residence policy for Newport - in particular.</p>	See comment ‘2.’ above.

<sup>2</sup> <https://www.pembrokeshirecoast.wales/wp-content/uploads/2019/12/Exam111-HS1-AP10.pdf>

Rep No.	Reference	Representation	Officer Response and Recommendation
6.	2902 / Newport Town Council	At Appendix 1 “The Timing and Phasing of New Allocations” referring to Land North of the Business Park (HA1) (15 total site capacity), development is said to start in 2026/27, and then increase by 2 units per year, so that by the end of the Plan Period, 5 units of accommodation will remain to be built. Why is this phasing necessary?	The Appendix is setting out what the likely development rate will be given the information available regarding the owner’s intentions. This would not prevent the site coming forward sooner were there firmer proposals for the site.