

**Report of: Strategic Policy Manager**

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**Subject: Approval of Local Development Plan 2 Review Report**

**Decision Required: Yes**

**Recommendation:**

The Authority is recommended to:

- A. Note the Report of Consultation on the Review Report (Appendix A).
- B. Approve the Review Report (Appendix B) for submission to the Welsh Government.

**1. Key messages**

This report is to inform Members of the outcome of the consultation undertaken on the Local Development Plan 2 (LDP 2) draft Review Report. The report seeks approval to submit the amended Review Report (Appendix B) to the Welsh Government.

**2. Background**

LDP 2 for the Pembrokeshire Coast National Park was adopted on 30 September 2020. Alongside Future Wales: The National Plan 2040, the adopted LDP 2 forms the development plan under the provisions of Section 38(6) of the Planning and Compulsory Purchase Act 2004.

In accordance with section 69 (1) of the Planning and Compulsory Purchase Act (2004) and LDP Regulation 41, the Authority is required to formally review the adopted LDP at intervals no longer than four years from the date of adoption. Guidance on the review process is contained in The LDP Manual (edition 3), which states that the Review Report should be published within 6 months of triggering a review of the plan and conclude on the revision procedure.

Officers commenced a review of LDP 2 in September 2024 and the draft Review Report was presented to Members and approved for public consultation on 11 December 2024. The Review Report provides the following information:

- A summary of the key findings from the three Annual Monitoring Reports on the plan's strategy, policy effectiveness, progress and implementation
- Key contextual changes and changes to legislation and policy at a national, regional and local scale that affect the development plan
- Review of plan topic areas identifying what needs to change and which parts of the evidence base require updating

- A reconsideration of the Sustainability Appraisal / Strategic Environmental Assessment, Habitats Regulation Assessment and other impact assessments including Welsh language, Equalities and Health
- Opportunities to work with neighbouring authorities to make efficiency savings
- Conclusion on whether a full or short form revision to the plan should be followed

The Review Report concludes that due to a range of issues being identified a full revision procedure is recommended which will result in a replacement plan being prepared, to be known as LDP 3. The full revision procedure offers the scope and flexibility for the plan to ensure conformity with Future Wales and updated national policy in Planning Policy Wales regarding the need to consider for a local policy approach for second homes or short-term lets and green infrastructure. These issues are cross cutting and have the potential to affect the strategy of the plan. There would be a significant risk of legal challenge in undertaking a short form revision process.

### **3. Consultation**

A public consultation was undertaken for a six week period from 10 January to 21 February. A letter was circulated to contacts on the Local Development Plan mailing list and included:

- Members of the public, businesses and organisations
- Local Members
- Town, City and Community Councils
- Key stakeholders, including Natural Resources Wales, Dwr Cymru Welsh Water, National Grid, Heneb, Cadw, Pembrokeshire County Council and neighbouring authorities, The Home Builders Federation, The Coal Authority and Telecommunications providers
- Planning agents

The Review Report was available to download from the Authority's website and could be viewed online at local libraries. A press release was circulated and the consultation was advertised on social media platforms. Officers also raised awareness of the consultation at the Planning Agents forum in December 2024.

A total of 10 responses were received from a range of consultees, including members of the public, key stakeholders, organisations and community councils. The representations received related to a range of different topic areas and are considered to be minor in nature. The comments received are summarised in the Report of Consultation and an officer response to each issue raised has been provided with consequential changes made to the draft Review Report. The main changes include:

- Additional references to Future Wales policies (paragraph 3.3.3)
- References to NRW's Wales Climate Change Risk Assessment and the Wales Climate Change Adaptation Plan and The Welsh Marine Area Statement (paragraphs 3.3.33, 3.3.34 and 3.4.9).
- Clarity and reference to the Statement of Sub Regional Collaboration for the West Wales sub-region regarding future reserves of sand and gravel (paragraphs 4.4.10, 4.4.11 and 5.1.16)

- Clarity on national policy requirements regarding flood risk (paragraphs 4.5.20 – 2.5.24)
- Reference to the requirement for housing delivery options to consider the contribution of small self build sites (paragraph 4.7.9)
- Clarity that the plan will consider evidence from the Local Housing Market Assessment with regard to specific housing requirements for older people and people with disabilities. The impact of any requirements for Lifetime Homes Standards on viability would be assessed (paragraphs 5.7.14, 5.7.16 and 5.7.25)
- Clarity that data from Council tax on second homes and short term lets will form a key piece of evidence when considering suitable policy options (4.7.29)
- Reference to the review of policy 58 on garden centres to ensure suitable control (paragraph 4.8.21)

Other minor changes have been introduced by officers where they are considered helpful to improve clarity.

No specific representations were received in relation to the conclusion of the report which recommends a full replacement plan is prepared. Officers received one email during the consultation period which sought clarity on why a short revision process could not be followed as it would be a quicker option to revise the LDP. Officers responded and outlined that the issues identified in the review report would impact on the plan's strategy and therefore a full revision procedure was required, with the short form revision procedure presenting a significant risk of legal challenge.

#### **4. Legal Background**

All Local Planning Authorities are required to prepare an LDP for their area under section 62 of The Planning and Compulsory Purchase Act 2004 (PCPA). Section 69 of the Planning and Compulsory Purchase Act (2004) and LDP Regulation 41 requires a Local Planning Authority to formally review their local development plan at intervals no longer than 4 years from the date of adoption and report the findings in a Review Report.

#### **5. Programme**

Subject to approval, the Review Report will be submitted to Welsh Government and made available on the Authority's website.

A Delivery Agreement would then be prepared setting out the timetable for the plan revision and community involvement scheme. It is anticipated the Delivery Agreement would be reported to Members for consultation in the summer 2025. The preparation of a full replacement LDP, to be known as LDP 3 would be prepared over approximately a three and a half year period. LDP 2 would remain the adopted development plan, until replaced by an adopted LDP 3.

#### **6. Financial considerations**

The Authority's Strategic Policy team have undertaken the review of LDP 2 and prepared the Review Report. The Welsh translation and consultation will be undertaken out of the current budget. The preparation of an LDP is a statutory requirement and sufficient budget will need to be made available to progress the replacement LDP. The Delivery Agreement will be prepared and will set out the timetable and resource implications.

## **7. Risk and Compliance Considerations**

In accordance with section 69 (1) of the Planning and Compulsory Purchase Act (2004) and LDP Regulation 41, the Authority is required to formally review the adopted LDP at intervals no longer than four years from the date of adoption. The Welsh Government guidance states that the Review Report should be submitted to the Welsh Government within 6 months of commencement of the review, by the end of March 2025. Officers have complied with this timescale, subject to agreement by Members.

## **8. Impact on our Public Sector Duties**

### **8.1 Integrated Impact Assessment Completed: No**

### **8.2. Equality, Socio- Economic Duty, Human Rights**

An Integrated Impact Assessment screening was completed for the draft Review Report (see NPA Report 48/24). The screening concluded it will result in no impacts on the groups and issues identified and that therefore, the Review Report itself does not require an Integrated Impact Assessment (IIA). The Review Report recommends that a Replacement LDP (LDP 3) is commenced and IIA will be integrated into the preparation of the replacement LDP from the earliest opportunity. The preparation of the Review Report has been undertaken in accordance with legislative requirements. The undertaking of a public consultation has exceeded the legislative requirements as consultation was not a statutory requirement.

The Public Equality Duty requires the Authority to have due regard to the need to eliminate discrimination, promote equality of opportunity and foster good relation 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 work will be taken forward as part of the sustainability appraisal on the replacement Local Development Plan and by the preparation of an Equalities Impact Assessment during Plan preparation.

### **8.3 Welsh language considerations**

The consultation exercise was carried out in accordance with the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards Regulations (No.1) 2015. The Review Report was made available bilingually. No representations were received in Welsh and no representations were made in relation to the Welsh language policies of the LDP. The revision to the LDP will be required to assess the

impact on the Welsh language through the Sustainability Appraisal process and in a separate Welsh Language Impact Assessment.

#### **8.4 Biodiversity Duty and De-carbonisation**

The Environment (Wales) Act 2016 introduced an enhanced biodiversity and resilience of ecosystems duty (Section 6 Duty). This duty applies to public authorities in the exercise of their functions in relation to Wales and will help maximise contributions to achieving the well-being goals. Planning authorities must seek to maintain and enhance biodiversity in the exercise of their functions.

The Environment (Wales) Act 2016 introduces the Sustainable Management of Natural Resources (SNMR) and sets out a framework to achieve this as part of decision-making. Natural Resources Wales (NRW) is required to produce a 'State of Natural Resources Report' and prepare 'Area Statements' to inform place based action. The Natural Resources Policy and Area Statements are a key piece of evidence which must be taken into account in development plan preparation.

As identified by Planning Policy Wales, the development of green infrastructure is an important way for local authorities to deliver their Section 6 duty. The process of Plan Review will involve using evidence to develop a Plan strategy and policies which provide a net benefit for biodiversity. The sustainability appraisal will provide a mechanism through which to assess any potential impacts on biodiversity at a policy, site and a whole Plan level as the document develops.

In 2019 the Welsh Government declared a climate emergency. The planning system plays a key role in tackling this emergency through the decarbonisation of the energy system and through promotion of placemaking and the sustainable travel hierarchy. As with biodiversity, the process of Plan Revision will involve using evidence to develop a Plan strategy and policies which support the wider move to decarbonisation. The sustainability appraisal will also provide a mechanism through which to assess the potential impacts on decarbonisation at a policy, site and a whole Plan level as the document develops.

#### **8.6 Well-being of Future Generations (Wales) Act**

The LDP is fully aligned with the Well-being of Future Generations (Wales) Act 2015. It is an integral part of the planning framework and LDP Review process.

### **9. Conclusion**

Members are recommended to approve the Review Report (Appendix B) for submission to the Welsh Government. Approving the Review Report will support the Authority to comply with legal requirements set out in the Planning and Compulsory Purchase Act (2004) and LDP Regulations for an LDP to be reviewed at least every four years. Welsh Government guidance states the Review Report should be published within 6 months of triggering a review.

### **10. Background Documentation**

- Report of Consultation on the draft Review Report (Appendix A)
- Review Report (Appendix B)



Awdurdod Parc Cenedlaethol  
Arfordir Penfro  
**Pembrokeshire Coast  
National Park Authority**



Pembrokeshire Coast National Park Authority  
Report of Consultation

## **Consultation on the Local Development Plan 2 Review Report**

March 2025

## 1. Introduction

**1.1** In September 2024, the Strategic Policy team commenced a full review of the adopted Local Development Plan 2 for the National Park. LDP 2 was adopted on 30 September 2020 and the Authority is required to formally review the adopted LDP at least every four years from the date of adoption. Members of The Pembrokeshire Coast National Park Authority (PCNPA) on 11<sup>th</sup> December 2024 granted approval for officers to undertake public consultation for the Draft Review Report of Local Development Plan 2. The review of the LDP is to ensure the Plan and its supporting evidence is kept up to date and provides a sound basis for planning decisions.

## 2. Engagement and Consultation

**2.1** Officers held a workshop on the review of LDP 2 with the National Park Authority Members in November 2024. The draft Review Report was presented to Members of the National Park Authority on 11 December, when Members gave approval to undertake public consultation on the draft Review Report. In response to comments raised by Members at this meeting, amendments were made as follows:

- References to the impact of light pollution on biodiversity and protected species is included in paragraphs 4.3.7 and 4.3.10
- Reference that the Welsh Language (Wales) Measure will be adhered to when revising the LDP is made in paragraph 4.3.27
- Detail on the preparation of the South West Wales Strategic Development Plan has been added to paragraph 5.1.3.

**2.2** Public consultation on the Draft Review Report was undertaken over a six-week period from 10<sup>th</sup> January to 21<sup>st</sup> February 2025.

**2.3** Copies of the Review Report were made available to download from the Park Authority's website and the report could also be viewed online at local libraries.

**2.4** Respondents were invited to submit their views on the proposed Draft Review Report in writing to the Development Plans Team at the Authority. An email address and postal address were provided.

**2.5** A letter regarding the consultation was circulated to contacts on the Local Development Plan mailing list, which included:

- Members of the public, businesses and organisations
- Local Members for each Community Council area within the National Park
- Town, City and Community Councils
- Key stakeholders, including Natural Resources Wales, Dwr Cymru Welsh Water, National Grid, Heneb, Cadw, Pembrokeshire County Council and



neighbouring authorities, The Home Builders Federation, The Coal Authority and Telecommunications providers

- Planning agents

**2.6** The PCNPA's Communications team circulated a press release and advertised the consultation on social media platforms.

**2.7** Planning Officers also raised awareness of the consultation at the Planning Agents forum meeting on 12 December 2024

### 3. Consultation responses

**3.1** A total of 10 responses were received from a range of consultees, including members of the public, key stakeholders, organisations and community councils.

**3.2** No specific representations were received in relation to the conclusion of the report which recommends a full replacement plan is prepared. Officers received one email during the consultation period which sought clarity on why a short revision process could not be followed as it would be a quicker option to revise the LDP. Officers responded and outlined that the issues identified in the review report would impact on the plan's strategy and therefore a full revision procedure was required. The short form revision procedure could present a significant risk of legal challenge. No representation was subsequently received in relation to the revision procedure.

**3.3** The representations received related to a range of different topic areas. The comments received have been summarised below and categorised according to their order of appearance in the review report. An officer response has been provided in the table below. The names of individual respondents have been anonymised.

Number	Representor	Plan Reference	Summary of Comment/Suggested Change by the Representor:	Officer Response:
1.	<b>Pembrokeshire County Council</b>	National Changes: Para 3.3.9 and Para 4.5.21	It would be useful to clarify the Authority's approach regarding the use of TAN 15 – The draft updated TAN was made available in September 2021 and has been updated several times since, but it remains in draft	We acknowledge that the draft updated TAN 15 has been available since September 2021 and has undergone several revisions, but it still remains in draft form. A possible release date of the updated TAN 15 is early-mid

Number	Representor	Plan Reference	Summary of Comment/Suggested Change by the Representor:	Officer Response:
			<p>and has not been adopted. Development Advice Maps have not been updated for some time and the general advice from Natural Resources Wales is that they are out of date. The Flood Maps for Planning have been in use since 2022 and are updated several times a year thus providing the up-to-date flood risk information. The cross match of flood zone types between the 2004 TAN15 and the Development Advice Maps intended to work alongside the updated TAN15 is difficult to operate in practice. However the Flood Map for Wales is intended to guide future planning decisions and provides the most up to date information on flood risk, incorporating climate change, as required by national planning policy.</p>	<p>2025, and until then we continue to rely on the adopted 2004 version of TAN 15 for determining planning applications. Regarding flood risk mapping, we recognise that the Development Advice Maps (DAMs) have not been updated for some time and that Natural Resources Wales (NRW) has advised that they are out of date. In light of this, the Flood Map for Planning (FMfP) is considered to represent the best available information we have on flood risk and NRW have advised that the FMfP may be regarded as a material consideration.</p> <p>Whilst in this transitional period the National Park Authority must ensure that flood risk assessments consider the most recent and accurate information. Paragraph 4.5.21 will be amended to note that where there are discrepancies between flood zone types between both Maps, the Authority will recommend an FCA is submitted in support of the planning application. Where these concerns are not appropriately addressed, the Authority is likely to object to</p>

Number	Representor	Plan Reference	Summary of Comment/Suggested Change by the Representor:	Officer Response:
				the development.
2.	<b>Home Builders Federation (HBF)</b>	National Changes Para 3.3	On the basis of recent responses from Welsh Government to LPAs the HBF suggests that reference is also made to Policy 19 Future Wales in section 3.3.3. HBF notes this issue is dealt with later in the document at Chapter 5 but should also be earlier in the document.	Section 3.3.1 already contains a reference to the Strategic Development Plans. However, reference to Policy 19 will be added at paragraph 3.3.3, highlighting the responsibility the National Park plays in preparation of SW Strategic Development Plan as part of the sustainable management of natural resources, protecting Wales's cultural heritage and promoting health and well-being. Further reference to SDPs has been added to paragraph 5.1.3 in the chapter on Opportunities for Joint and Collaborative Working. Reference to Future Wales, policy 3 Supporting Urban Growth and Regeneration has also been added to paragraph 3.3.3.
3.	<b>Natural Resources Wales (NRW)</b>	National Changes Para 3.3.18	Reference to the State of the Natural Resources Report (SoNaRR) 2020 is noted as well as recognition to review policies that can help transformative change across food, transport and energy systems. Please note that NRW are working on a third SoNaRR due to be published later in 2025. An 'Interim Report (2024)'	Comments noted.

Number	Representor	Plan Reference	Summary of Comment/Suggested Change by the Representor:	Officer Response:
			<p>outlines our plans for SoNaRR2025, highlights key new evidence on what has changed since SoNaRR 2020, and the main messages that are emerging from that evidence</p>	
4.	<p><b>Natural Resources Wales (NRW)</b></p>	<p>National Changes</p>	<p>We question whether the national evidence list should also include Climate Change Risk Assessment (CCRA)<sup>3</sup>, Wales CCRA, and Wales Climate Change Adaptation Plan?</p>	<p>Comments noted – The documents will be considered when preparing the evidence base for the LDP revision. Reference to both the Wales Climate Change Risk Assessment and the Wales Climate Change Adaptation Plan will also be made at paragraph 3.3.33 and 3.3.34</p>
5.	<p><b>Natural Resources Wales (NRW)</b></p>	<p>National Changes</p>	<p>It may be helpful to note for reference:</p> <ol style="list-style-type: none"> <li>1. PPW12 update also says that Local Planning Authorities need to use LANDMAP as part of their evidence base.</li> <li>2. The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 Cycle 3 Interim classification will be available in early 2025.</li> <li>3. Bathing water quality is assessed by NRW at 29 locations around the Pembrokeshire Coast between May and</li> </ol>	<ol style="list-style-type: none"> <li>1. Noted - The evidence base that informs the development of landscape policies for LDP2 already includes the LANDMAP database.</li> <li>2. Noted.</li> <li>3. The Authority acknowledges the 2024 survey results and will continue to work with partners during the review process, ensuring new development does not have a negative impact on water quality in the National Park.</li> </ol>

Number	Representor	Plan Reference	Summary of Comment/Suggested Change by the Representor:	Officer Response:
			<p>September each year. The results are then used to project an annual rating / classification, based primarily on the concentrations of faecal coliforms present in the water. Results for sampling undertaken in 2024 were: 27 beaches classed as 'Excellent' – the greatest number recorded. Amroth was classed as 'Good' and Wisemans Bridge as 'Sufficient.'</p>	
6.	<b>Natural Resources Wales (NRW)</b>	Regional Changes Para 3.4.8	<p>We are pleased to note recognition of taking into account the SW Area Statement priority themes for supporting SMNR but would also like to highlight the relevance of the Marine Area Statement and the themes of:</p> <ul style="list-style-type: none"> <li>- Building resilience of marine ecosystems</li> <li>- Nature-based solutions and adaptation at the coast</li> <li>- Making the most of marine planning</li> </ul>	Comments noted – Paragraph 3.4.9 will be included to take account of The Welsh Marine Area Statement and its priorities of ecosystem resilience, sustainable marine planning, and climate change all of which will need to be considered in the replacement LDP.
7.	<b>Pembrokeshire County Council</b>	Local Changes: Section 3.5	The Martin Higgitt Report could usefully be taken account of in this section. The findings and recommendations of the	The report has not been circulated to the wider public and has not yet been subjected to the same level of scrutiny as other publicly

Number	Representor	Plan Reference	Summary of Comment/Suggested Change by the Representor:	Officer Response:
			<p>Report will influence the location of development as well as transport infrastructure and traffic movements.</p>	<p>available documents cited in the Review Report. However, the Authority agrees that the findings in the report will help inform the next LDP as future policy will need to prioritise developments that reduce car dependency, steer new development towards areas with sustainable transport access, and support "low-impact" visitor facilities - No changes are proposed to the Review Report.</p>
8.	<p><b>Individual Public Representative</b> (ID 339)</p>	<p>Spatial Strategy  Policy 3 Newport Local Centre</p>	<p>Whilst PCNPA LDP2 under Newport Local Centre does mention under 4.23 Issues for Newport does mention "an ageing population." as of concern, this does not translate into policy under Policy 3 Newport Local Centre (Tier 2) (Strategy Policy)</p> <p>In view of the very high and increasing proportion of older people living in Newport, an unknown number living in housing which is not suitable, a review of Policy 3 should include:</p> <ul style="list-style-type: none"> <li>- Consideration of a high proportion of new homes on sites of 5 or more in Newport to be built to Lifetime Homes Standards.</li> </ul>	<p>Policy 46 of the Plan is the Strategy Policy for Housing. The Review Report identifies that this policy will require review to take account of up to date evidence. Paragraph 4.7.8 does state that the plan will need to consider a range of issues, which includes an ageing population. There is reference in paragraph 4.7.14 that "<i>the plan will review evidence in the latest LHMA and develop robust policies to ensure the plan delivers affordable housing in accordance with the spatial need, the size of property required and tenure.</i>" The following text has also been added to paragraph 4.7.14: "<i>The plan will also need to consider evidence from the LHMA with regard to specific</i></p>

Number	Representor	Plan Reference	Summary of Comment/Suggested Change by the Representor:	Officer Response:
			<p>- whether the replacement sheltered housing being provided by PCC is sufficient supported accommodation to meet the increasing needs of older people in the area.</p>	<p><i>housing requirements for older people and people with disabilities.”</i></p> <p>Reference has also been added to paragraph 4.7.24 to consider the viability implications of requiring Lifetime Homes Standard.</p> <p>Policy 47 (Housing Allocations or Land with Planning Permission) requires a full review which would identify land for future housing development in accordance with the spatial and growth strategy. A full revision to the LDP would provide the opportunity to undertake a call for candidate sites to identify and assess potential new sites for development against a range of environmental, social and economic criteria.</p>
9.	<b>Home Builders Federation (HBF)</b>	Priority A Para 4.3.20	The HBF considers that it would not be the role of a new policy 'to assess' the impact of development and nutrients on water quality.	When undertaking policy work relating to the impact of nutrients on water quality we would liaise with NRW, Dwr Cymru/Welsh Water and other organisations (along with evidence from Nutrient Management Boards) to ensure that development requirements relating to water quality are met and achieved. The establishment of a new policy incorporating robust assessment mechanisms

Number	Representor	Plan Reference	Summary of Comment/Suggested Change by the Representor:	Officer Response:
				would help identify the most appropriate locations for development. – No changes are proposed to the Review Report.
10.	<b>Pembrokeshire County Council</b>	Priority B Para 4.4.10	Minerals – The section refers to ' <i>Sand and gravel production being reduced in the National Park with future reserves needing to be supplied by Pembrokeshire and Ceredigion</i> '. Given that the Regional Technical Statement (RTS) requires Authorities to work collaboratively to ensure adequate future supplies then perhaps the presumption in advance that Pembrokeshire County Council or Ceredigion will provide the reserves needs to be reflected upon? It is useful to note – significant work has been taken forward on the Statement of Sub Regional Collaboration (SSRC) for the West Wales sub-region. This may, in due course, vary the provisions of the 2nd Review of the RTS for Aggregates, particularly in relation to the provision of future supplies of sand and gravel in West Wales. However, it is only in draft at present and would need to be subject to	<p>Comments noted. Paragraphs 4.4.10 /4.4.11 will be amended to recognise that provision of future reserves of sand and gravel would fall to Ceredigion (in line with the RTS), although PCC has indicated a willingness to contribute as evidenced by the LDP 2, Deposit Plan 2 extension proposal for Trefigin Quarry and its approach to Areas of Search for sand and gravel. Considerable work has been undertaken on a Statement of Sub-Regional Collaboration for the West Wales sub-region, which may vary the provisions as set in in RTS 2<sup>nd</sup> Review. The SSRC would be subject to consultation with the SWRAWP.</p> <p>Recognition that the current sand and gravel quarries within the National Park will continue to operate for the remainder of their permissions will also be added in this section.</p>



Number	Representor	Plan Reference	Summary of Comment/Suggested Change by the Representor:	Officer Response:
			<p>consultation with the SWRAWP. In the absence of an agreed SSRC, the burden for future provision of sand and gravel rests with Ceredigion CC (in line with the RTS), although PCC has indicated an in-principle willingness to contribute – as evidenced by the LDP 2, Deposit Plan 2 extension proposal for Trefigin Quarry and its approach to Areas of Search for sand and gravel. Also, the current production sites in the PCNP (Trefigin and Pant Gwyn) will remain operational for some time to come under existing permissions. To note that Carmarthenshire CC is also involved with the SSRC.</p>	
11.	<p><b>Mineral Products Association (MPA) Wales/Cymru</b></p>	<p>Priority B Para 4.4.11</p>	<p>It is now over four years since the formal publication of the RTS 2nd Review and endorsement by the respective LPAs. We welcome clarification and firm commitments indicating when the SSRC will be consulted upon with the RAWP and Industry working towards a timetable for completion of the SSRC process.</p> <p>The text should clarify when the SSRC will be produced</p>	<p>Comments noted. Considerable work has already taken place in the West Wales sub-region towards the SSRC. Mapping elements have been completed with work ongoing on the draft text to accompany the mapping.</p> <p>It is not possible to confirm when the SSRC will be produced and adopted, other than it would need to be produced before any of the constituent LDPs are</p>

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			and adopted.	submitted for Examination.
12.	<b>Pembrokeshire County Council</b>	Priority C Para 4.5.22	It would be useful to clarify that the reason for the National Park Authority not progressing to stages 2 and 3 SFCA was because LDP2 had already been adopted <u>and</u> none of the site allocations were in flood risk zones.	Noted – Paragraph 4.5.22 will be updated to make reference to this distinction.
13.	<b>Pembrokeshire County Council</b>	Priority C Para 4.5.24	The policy will need to put more focus on promoting the inclusion of the SMP's policies in order to help manage residual risks from coastal erosion and flooding to inform future planning decisions. It would be useful to clarify that rather than 'including' SMP policies, the LDP should complement and be consistent with the SMP policies – as set out in Planning Policy Wales. It is useful to note - This matter has been discussed by the two Coastal Groups (the SCBCEG and the West of Wales CG).	Noted – the section will be revised to explicitly acknowledge that the LDP will continue to align with and support the SMPs, in accordance with the framework established in PPW. We also note the support of both Coastal Groups (SCBCEG and West of Wales CG) regarding this matter. As we transition into Epoch 2 (medium-term), collaborative engagement with both groups remains a priority. We will maintain active participation with these regional stakeholders to ensure that future policy development is informed by their expertise and ongoing initiatives.

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14.	<b>Pembrokeshire County Council</b>	Priority C  Para 4.6.12	<p>The Review Report advises that there are no key employment sites in the National Park. There is a reliance on Pembrokeshire County Council to allocate employment sites. The Council's current Plan was adopted in 2013. The Council is currently in the process of replacing its LDP. Whilst key or strategic employment sites may be better located in or close to the larger centres of population outside of the National Park, the National Park Authority review process could usefully take account of demand for employment premises for medium or micro businesses to determine whether allocations within the National Park are necessary. Also, South Hook LNG site (partly within the PCNP and partly outside) is a key employment site. That said, it is accepted that future allocations for employment purposes (B class uses and those for major energy projects) will be in the Council's planning area. Some of these may be quite close to the NP boundary, so ongoing liaison with the PCNPA will of course be necessary.</p> <p>Whilst no applications are being determined contrary to the current PCNP Local</p>	<p>It is agreed that insights into the needs of micro, small, and medium-sized enterprises will be highly relevant moving forward, given their significant role in the local economy within and around the National Park. Research such as the Two County Economic Study (2019) will provide valuable data to assess the need for additional employment land allocations or support for rural enterprises within the Park. However, a focus on balancing economic growth with environmental protection will remain paramount.</p> <p>The comment on the assessment process is noted. The LDP evidence base, including the current employment provision within the Park will be reviewed and updated as part of the preparation of the Replacement Plan, to take account of any contextual changes and ensure that the strategy and policies within the plan are robust and can address the key issues identified.</p>

Number	Representor	Plan Reference	Summary of Comment/Suggested Change by the Representor:	Officer Response:
			Development Plan, it is suggested that an assessment of pre-application enquiries and refusals of applications for employment uses would provide a good indication of potential need for allocations along with the invitation for sites at Candidate Site stage.	
15.	<b>Mineral Products Association (MPA) Wales/Cymru</b>	Priority C Para 4.5.1	We would suggest reference to local minerals is included within this paragraph, not least reference to Policy 24 Local Building Stone.	Minerals are considered under Priority B.
16.	<b>Individual Public Representative</b> (ID 4748)	Priority C Para 4.5.19	Regarding point 4.5.19, when it has come to the granting of applications contrary to flood policy it is noted for some applications <i>“the Development Management Committee acknowledged the flood risk but considered that this was outweighed by social and economic viability”</i> . Perhaps the Authority should consider a less onerous flood policy that does not prevent the regeneration of settlements and harm the economy of the area.	All new development must align with the core principles of national flood risk policy, as outlined in PPW and TAN 15, while taking account of the expert guidance from government-sponsored bodies such as NRW. The policies within the LDP must also be consistent with and reflect national planning guidance.  Policy 34 is informed by the Development Advice Map, which is considered to be out of date when compared to the more recent and frequently updated Flood Maps for Planning. Discrepancies between both maps have led to decisions being made contrary to the Plan. It is anticipated that by the end of

Number	Representor	Plan Reference	Summary of Comment/Suggested Change by the Representor:	Officer Response:
				the current Plan period, the updated TAN 15 and Flood Maps for Planning will be fully adopted, providing greater clarity and precision in assessing new development impacted by flooding. The flood risk policies within the amended LDP will be informed by this updated guidance, ensuring a robust and consistent approach to managing flood risk in future development proposals.
17.	<b>Pembrokeshire County Council</b>	Priority E  Para 4.7.16	The Authorities could usefully liaise regarding the next Affordable Housing Viability Assessment to be carried out by the National Park Authority to consider assumptions used. Inevitably, there are differences of approach given the later publication of the County Council's Assessment. This is an area of work that is in constant flux.	Agree - aligning assumptions and methodologies, where appropriate, would be beneficial to ensure consistency and robustness in our respective assessments. Reference has been added to paragraph 5.1.4 to state that officers will liaise with PCC when developing key evidence base documents, including the Affordable Housing Viability Assessment.
18.	<b>Pembrokeshire County Council</b>	Priority E  Para 4.7.28	Second and holiday homes: The data sharing agreement with the Council is noted. It would be useful to have an ending to the last sentence of this paragraph.	Formatting issue noted, the paragraph will be amended as follows:  <i><b>4.7.28</b> The Authority has a data sharing agreement with Pembrokeshire County Council to obtain council tax data on the number of second homes and short term lets. This data provides the Authority with the spatial detail</i>

Number	Representor	Plan Reference	Summary of Comment/Suggested Change by the Representor:	Officer Response:
				<p><i>of communities with a high level of second and short term lets. It will be a key piece of evidence when considering suitable policy options for second homes and short term lets.”</i></p>
19.	<b>Home Builders Federation (HBF)</b>	Priority E Para 4.7.16	The HBF would note that SuDS commuted sums associated with SAB have also now become a factor relevant to viability and should be listed in the document.	<p>Policy 32 of the current LDP2 already mandates that all developments incorporate sustainable drainage systems for surface water disposal. The policy stipulates that planning applications for new developments in Wales exceeding one dwelling or a construction area of 100 square metres must be accompanied by an appropriate assessment. The reasoned justification for Policy 32 acknowledges that the viability of large-scale developments is contingent upon the developer's ability to enter into a planning obligation to cover the costs of adoption and long-term management.</p> <p>The review process will consider any future amendments, ensuring that Policy 32 remains fully aligned with National Policy and SAB requirements.</p>

Number	Representor	Plan Reference	Summary of Comment/Suggested Change by the Representor:	Officer Response:
20.	<b>Home Builders Federation (HBF)</b>	Priority E Para 4.7.18	<p>The HBF notes that the Council reference that Planning Policy Wales states the Welsh Government's policy is to secure zero carbon buildings and that planning authorities should assess strategic sites to identify opportunities to require higher sustainable building standards, including zero carbon. HBF considers the key issue is whether or not any on the new sites allocated within the plan are likely to be considered strategic. In representations to both the Monmouth and Vale of Glamorgan Plan HBF have suggested that Building Regulations has always been and remains the best way to control the way in which homes are physically built, ensuring a consistent approach across Wales.</p> <p>Further HBF would note that there is still conflicting evidence over the actual cost of building new homes to Net Zero, particularly when there are many ways in which it can be achieved, accordingly this needs to be given careful consideration at the viability stage.</p>	Noted - The viability assessment would consider policy options that would have an impact on the viability of housing development. This could include the potential impact of policy options to require zero carbon housing, lifetime homes standard and policies on second homes and short term lets. This is detailed in paragraph 4.7.16 of the Review Report.

Number	Representor	Plan Reference	Summary of Comment/Suggested Change by the Representor:	Officer Response:
21.	<b>Individual Public Representative</b> (ID 339)	Priority E  Para 4.7.20	There is no mention of meeting the needs of older people within PCNPA LDP2 housing policies. I do not agree that policy 52 is appropriate and in accordance with the LHMA and other relevant evidence about the housing needs of older people. Where in PCNPA LDP2 is there consideration of the need to provide specialist and supported accommodation?	The Local Housing Market Assessment (LHMA) forms a key evidence base document that will inform LDP policies. Reference is made to the draft LHMA for Pembrokeshire 2023 in paragraph 3.5.8 which is awaiting approval from the Welsh Government. The evidence that will be taken into account is detailed in paragraph 4.7.7 of the Review Report, and includes consideration of an ageing population. Reference has been made to paragraphs 4.7.14 and 4.7.24 to state that the plan will need to consider evidence from the LHMA with regard to specific housing requirements for older people and people with disabilities.
22.	<b>Individual Public Representative</b> (ID 4748)	Priority E  Policy 46 Housing	With regards to policy 46, are there any changes that can be made to support self-builders?  It seems the Welsh government is keen to support self-build. However, this does appear dependent on finding suitable self-build plots. Is it possible to have a policy similar to the affordable housing exception sites to allow some plots to come forward?	The National Park is afforded designation conferring the highest status for the conservation of landscape and the capacity for allocating new sites within the Park is limited. The current Plan prioritises the delivery of affordable housing, which is predominantly facilitated through larger-scale development sites and also through Policy 49 (Affordable Housing Exception Sites). However, the Growth and Spatial Strategies, including housing allocations, will be re-



Number	Representor	Plan Reference	Summary of Comment/Suggested Change by the Representor:	Officer Response:
				<p>considered as part of the Replacement LDP process. This will include consideration of housing delivery options, including small self-build sites, as required by PPW 12. Reference has been made at paragraph 4.7.9.</p>
23.	<p><b>Individual Public Representative</b> (ID 4748)</p>	<p>Priority E Policy 46 Housing</p>	<p>With regards to policy 46, are there any changes that can be made to support top quality architecture coming forward in the area, as well as helping with self build?</p> <p>Perhaps there are exceptional circumstances where homes can come forward where otherwise policy would not allow. The wording could be similar to the NPPF, that a home can be built if:</p> <p>"the design is of exceptional quality, in that it:</p> <ul style="list-style-type: none"> <li>• is truly outstanding, reflecting the highest standards in architecture, and would help to raise standards of design more generally in rural areas; and</li> <li>• would significantly enhance its immediate setting, and be sensitive to the defining characteristics of the local area." </li></ul>	<p>As highlighted in the response above (8), Policy 46 of the Plan will require review. While reference to paragraph 80(e) (Rural Housing) of the NPPF is acknowledged, this is national policy for England. It is important to note that Welsh Policy (PPW 12) maintains that new development in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled.</p> <p>The current LDP 2 also addresses the exceptional circumstances where homes can come forward through Policy 49 (Affordable Housing Exception Sites), which permits the consideration of unallocated sites where appropriate and justified.</p> <p>Furthermore, as outlined in Section 4.5 of the Review Report, Policy 29 (Sustainable Design) will be reviewed,</p>

Number	Representor	Plan Reference	Summary of Comment/Suggested Change by the Representor:	Officer Response:
			<p>Historic developments within the National Park may have gained permission in this way, however there does not seem to be a current policy that would support such developments which is a shame.</p> <p>I would imagine both suggestions would contribute to the "retention of a more youthful population profile" (an objective noted in the report) as well as the economic success of the area.</p>	<p>placing more emphasis on energy efficient buildings and how design can relate green infrastructure to the surrounding natural environment. Supplementary Planning guidance will also be provided for conversions of appropriate buildings and replacement dwellings which will encourage and support high-quality architecture.</p> <p>No changes are proposed to the Review Report.</p>
24.	<b>The Nolton &amp; Roch Community Land Trust (N&amp;RCLT)</b>	Priority E Para 4.7.15	Affordable housing may be built on exception sites but the definition of "exception" can be very restrictive. Our CLT is asking for this to be reviewed.	Policy 49 will be reviewed as part of the revision process. National planning policy as set out in Planning Policy Wales (edition 12) requires exception sites to be within or adjoining existing settlements and requires affordable housing to meet the needs of local people in perpetuity (paragraph 4.2.35). LDP policies must be consistent with national policy.
25.	<b>The Nolton &amp; Roch Community Land Trust (N&amp;RCLT)</b>	Priority E Housing	At present the need for affordability in perpetuity (which we support) mitigates against any form of ownership/co-ownership. We believe there are models used elsewhere that can address this concern	Technical Advice Note 2 (paragraph 10.14) states that affordable housing exception sites are not appropriate for market housing and affordable housing must remain in perpetuity. Shared ownership

Number	Representor	Plan Reference	Summary of Comment/Suggested Change by the Representor:	Officer Response:
				<p>or Low Cost Home Ownership, or any other intermediate products which require occupants to acquire a mortgage require a Mortgagee in Possession clause, in which the mortgage company would acquire the property if the owner were to default on their loan payments. This clause has the potential to undermine the requirement for affordable housing to be held in perpetuity and could result in the release of market housing in the countryside, which would otherwise not have been suitable for market housing. Evidence of models where ownership or co-ownership is used elsewhere can be submitted to officers.</p>
26.	<p><b>The Nolton &amp; Roch Community Land Trust (N&amp;RCLT)</b></p>	<p>Priority E Para 4.7</p>	<p>Current policies seem to prevent farm buildings from being converted into dwellings for permanent residence, whereas holiday lets are permitted. We do not understand the rationale for this and, with the current massive demand for affordable housing, we feel the related policies should be reconsidered.</p>	<p>Policy 7 allows for conversion of appropriate buildings to a range of uses with market housing being given priority in residential conversions. New dwellings are permitted if they meet the definition of a rural enterprise dwelling. Policy 50 also permits the conversion of rural buildings.</p> <p>All planning applications are determined on their own merits, in accordance with the Plan policies.</p>

Number	Representor	Plan Reference	Summary of Comment/Suggested Change by the Representor:	Officer Response:
27.	<b>Pembrokeshire County Council</b>	Priority F Retail	Retail provision is becoming increasingly mixed with other uses or experiences both within town centres and in the countryside. Garden Centres, for example are used widely as restaurants or coffee shops, as much as for retail. A review of policy would benefit from considering how other uses, combined with retail premises or land is considered.	<p>Noted - In response to updates in national policy guidance, the replacement LDP will need to recognise the shift in town centres transitioning from their traditional retail-focused roles to becoming more diverse, multi-functional spaces. To support this evolution, the "town centres first" principle, combined with a sequential approach to site selection, shall be employed to promote the development of town centres with a greater emphasis on mixed-use opportunities.</p> <p>Additionally, Policy 58 of the current Plan details that garden centers must not undermine the vitality and viability of retail facilities. The policy may need to be reviewed in terms of their multifunctional capacity and the range of goods which can be sold from them. Reference to this will be added at paragraph 4.8.21</p>
28.	<b>Home Builders Federation (HBF)</b>	Priority F Para 4.8.11	The HBF notes that the requirement for digital infrastructure including broadband connectivity in new development is covered by Building Regulations and that electric vehicle charging	Comments noted.

Number	Representor	Plan Reference	Summary of Comment/Suggested Change by the Representor:	Officer Response:
			infrastructure has recently been consulted on by WG and it is likely will also be covered by Building Regulations in the near future.	
29.	<b>Mineral Products Association (MPA) Wales/Cymru</b>	Chapter 5 Para 5.1.3	<p>We are surprised there is no reference to joint working on Minerals through the SSRC process as indicated in the RTS 2nd Review (Sep 2020). Progress on the SSRC is clearly overdue and a timetable for delivery should be indicated.</p> <p>Text should be amended to include Minerals and identify a clear timetable for progressing the SSRC, with appropriate engagement with Industry and the SWRAWP.</p>	It is agreed that joint working on minerals through the SSRC process should be included in this section. Please see response above (11) with regard to the timeline for producing and consulting on the SSRC.
30.	<b>Mineral Products Association (MPA) Wales/Cymru</b>	Appendix 1	We note proposals to Review Policies 21- 26 and welcome further engagement on these.	Comments noted.
31.	<b>The Coal Authority</b>	Non-Specific	We note that the Review Report identifies that procedurally a full revision of the LDP2 should be followed. I can confirm that the Planning team at the Coal Authority have no specific comments to make on this conclusion or the	Comments noted

Number	Representor	Plan Reference	Summary of Comment/Suggested Change by the Representor:	Officer Response:
			content of the AMR.	
32.	<b>National Grid Electricity Distribution (SouthWest) Plc.</b>	Non-Specific	<p>NGED wishes to take this opportunity to remind the local planning authority that NGED has funds available through its Visual Impact Provision Programme to allocate to projects within National Parks to remove and underground existing overhead lines which detract from the natural beauty of the protected landscape.</p>	Comments noted
33.	<b>Newport Town Council</b>	Non-Specific	<p>We have found the analysis of AMR findings, the contextual changes since PCNPA LDP2 was adopted, and the review of LDP vision, objectives, strategy and policy of great interest.</p> <p>Newport Town Council will fully engage with the Review process if formally agreed by NPA and WG.</p>	Support from Newport Town Council is noted.

Pembrokeshire Coast National Park

# Local Development Plan 2

(Adopted September 2010)



## Review Report

March 2025



Parc Cenedlaethol  
Arfordir Penfro  
Pembrokeshire Coast  
National Park

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### 1.1 Background

**1.1.1** The Pembrokeshire Coast National Park Authority was one of the first authorities in Wales to adopt a replacement Local Development Plan 2 (LDP 2). LDP 2 was adopted by the Authority on 30th September 2020 and the plan sets the planning framework for development until the end of 2031.

**1.1.2** The LDP 2 has been monitored annually, and, to date, three Annual Monitoring Reports (AMRs) have been published. These reports evaluate how well the LDP's strategy, objectives, and policies are being delivered. Each Local Planning Authority must carry out a full review their LDP no longer than four years from the date of its adoption<sup>1</sup>. This ensures the plan is up to date and identifies any changes that may be required. The Authority formally commenced review of LDP 2 in September 2024.

**1.1.3** The Authority is aware of the Welsh Government's consultation 'Promoting a resilient and high performing planning service' (November 2024) which proposes extending the LDP Review period from four years to six years. However, the current legislation requires a full review every four years.

### 1.2 Purpose of the Report

**1.2.1** The Review Report identifies where the LDP is delivering, areas where it needs to change and why. It discusses the key issues and their effects on the strategy, policies, and sites. The Review Report can only highlight areas that need change, rather than specifying how the Plan will be altered. This report does not change or provide the detail of potential changes to the adopted LDP 2. Any changes to the adopted LDP 2 must be made through a revision to the plan.

**1.2.2** The Review Report concludes on the appropriate revision procedure to LDP 2. There are two revision procedures: the short form revision or a full revision. The short form revision procedure is where there are limited and focused changes required to the plan. The full revision procedure is a full revision to the LDP and would follow the same procedures and stages in preparing LDP 2.

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<sup>1</sup> United Kingdom Government, *Planning and Compulsory Purchase Act, 2004*, available at: <https://www.legislation.gov.uk/ukpga/2004/5/resources> accessed on 18th November 2024.

## 1.3 Structure of Report

**1.3.1** This report is organised as follows to address the requirements set out in the Development Plans Manual (Edition 3).

### **Findings of the Annual Monitoring Reports**

**1.3.2** Chapter two outlines the findings of the three Annual Monitoring Reports, including the monitoring information for the Sustainability Appraisal.

### **Contextual Changes**

**1.3.3** Chapter three contains a summary of the main contextual changes since LDP 2 was adopted, including the main changes to legislation and policy at a national, regional and local level which impact the development plan.

### **Review of LDP Vision, Objectives, Strategy and Policies.**

**1.3.4** Chapter four provides a detailed review on the vision, objectives, strategy and policies of the LDP. This section outlines each LDP topic area, evaluating its effectiveness and identifying any necessary changes and parts of the evidence base that need updating.

### **Joint Working Opportunities**

**1.3.5** Chapter five explores the potential opportunities to prepare a Joint LDP with neighbouring authorities and opportunities to work with neighbouring local planning authorities.

### **Conclusion on Review Procedure**

**1.3.6** Chapter six summarises the review findings and indicates whether a Full Revision (Replacement LDP) or a Short Form Revision of the LDP is recommended, along with the reasons for this.

## 1.4 Consultation on the Review Report

**1.4.1** While it is not a statutory requirement to undertake a consultation on the draft Review Report, the Welsh Government and the Authority consider that it would maximise the robustness and justify the conclusions of the Review Report if views were invited on the content and conclusions of this report. Stakeholders and the public are invited to contribute to help identify how effective the existing LDP 2 has been in the delivery of development and addressing key issues in the National Park. Views will also be invited on what issues need to be considered in a replacement LDP. Key stakeholders and the public will be invited to submit any representation on the draft Review Report to the Authority over a six week period in early 2025. Officers will consider all representations made and make required changes to the report before presenting a final Review Report to National Park Authority Members in March 2025. Once approved, the Review Report will be submitted to Welsh Government and will be available to view on the Authority's website.

**2.1.1** The Authority has prepared and published three AMRs since the Local Development Plan 2 was adopted on 30th September 2020. The policies of the Plan are assessed to the extent of which they are being implemented as intended, and whether the Plan objectives are being achieved. 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.

**2.1.2** The Plan identifies 16 key outcomes to be achieved by the end of the Plan period (i.e. 2031). Thirty-six indicators and targets are grouped beneath these outcomes to assess the performance of the Plan.

**2.1.3** In the third AMR monitoring period (2023-24) all indicators demonstrated positive policy implementation, with no triggers reached, and are shown as green in the table below.

**Table 1: Summary of LDP Monitoring for AMR 3 (2023-24)**

Action	Assessment	Number of Indicators
Continue Monitoring	Development plan policies are being implemented effectively.	36
Training Required	Development plan policies are not being implemented as intended and officer or Member training is required.	0
Supplementary Planning Guidance (SPG) Required	Development plan policies are not being implemented as intended and further guidance is required, potentially preparing additional SPG.	0
Further Investigation/Research Required	Development plan policies are not being implemented as intended and further research and/or investigation is required.	0
Policy Review Required	Development plan policies are not being implemented and are failing to deliver; a review of the specific policy may be required.	0
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.	0

**2.1.4** In AMR Monitoring periods 1 (2021-22) and 2 (2022-23) a small number of indicators were flagged for further investigation and research or identified that

training was required. Where these were identified, the appropriate actions have been taken and have resulted in all indicators showing positive policy implementation and a ‘continue monitoring’ status.

**2.1.5** While the indicators do not highlight the need for a review of the Pembrokeshire Coast National Park’s Local Development Plan 2, a comprehensive review is required in order to comply with the statutory requirement to commence a review no longer than four years from its adoption, and in view of the contextual changes highlighted in this report.

## 2.2 Key Findings of LDP 2 Annual Sustainability Appraisal (SA) Monitoring

**2.2.1** The Plan identifies 15 Sustainability Objectives which are monitored through the AMR.

**2.2.2** In the third AMR monitoring period (2023-24), 13 SA indicators demonstrated that performance progress remains acceptable, with two indicators identified as requiring further data to make conclusions.

**Table 2: Summary of Sustainability Appraisal Indicator Monitoring for AMR 3 (2023-24)**

Sustainability Appraisal Indicator No.	Topic	Analysis
1	Agriculture and Forestry	Further data is required to make conclusions – latest data included.
2	Travel	Performance remains acceptable
3	Special Qualities	Performance remains acceptable
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	Performance remains acceptable
7	Factors contributing to climate change	Performance remains acceptable
8	Sustainable Communities	Performance remains acceptable

<b>Sustainability Appraisal Indicator No.</b>	<b>Topic</b>	<b>Analysis</b>
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.

**2.2.3** During the plan period, thus far, in monitoring the sustainability appraisal indicators it became clear that two of the indicators need better or more frequently updated data sources. As part of the review process the Authority will be revisiting the sustainability appraisal framework and indicators with a view to identifying more reliable metrics against which to measure progress against the objectives.



**3.1.1** The review is required to consider significant contextual changes since adoption of LDP 2 in September 2020. This chapter will outline a number of key events which has impacted on the social, economic, environmental and political context in which the LDP operates. Changes to legislation and new policies and strategies at a national, regional and local scale which impact on the planning context will also be summarised.

### 3.2 Key Contextual Changes

#### **Covid-19 pandemic**

**3.2.1** The Covid-19 pandemic had significant economic and social impacts and caused changes in lifestyles and consumption patterns. For example, the requirement to stay at home led to a rise in home and remote working which has impacted on the demand for office space, impacted town centres and led to an increase in demand for housing in rural areas. The pandemic had a disproportionate impact on vulnerable groups and lockdowns highlighted the importance of active travel opportunities and access to green and open spaces. The tourism industry in Pembrokeshire was impacted during lockdowns and experienced a high demand for staycations once travel was permitted. The pandemic caused significant disruption to global supply changes and shortages of essential materials, resulting in a sharp rise in the cost of construction materials.

#### **Brexit**

**3.2.2** The UK officially left the European Union (EU) on 31 January 2020. The exit from the EU is likely to lead to longer-term structural change in the UK economy affecting trade, investment and immigration. The UK's departure from the single market and customs union introduced new rules, paperwork and checks for companies trading with the EU. There has also been a social and political impact as there are stricter immigration controls which potentially impacts on the labour market, particularly in certain sectors that were reliant on EU workers, such as agriculture. Brexit has led to significant changes in how environmental policies are formulated and implemented. The UK has had to replace EU Environmental legislation, for example, European Sites are now referred to as the National Site Network. The sectors impacted are agriculture and food production, fishing and the environment, which are significant in the National Park.

## Conflict in Ukraine and Israel

**3.2.3** The Ukraine war at the start of 2022, led to a sharp increase in global energy prices and contributed to increased inflation, increased household energy bills, food and transportation costs. The current conflict in the Middle East involving Israel and Hamas has further impacts. This international instability has influenced political priorities with a renewed focus on energy security and renewable energy production.

These major events detailed above contributed to the cost of living crisis where the cost of food, housing and energy rose sharply in relation to incomes.

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## Changes to Legislation, Policy and Strategy

### 3.3 National Changes

#### Future Wales: The National Plan 2040

**3.3.1** In February 2021, the Welsh Government published Future Wales which has development plan status. It replaced the Wales Spatial Plan and sets out a 20-year strategic direction for development in Wales. The plan seeks to address key national priorities through the planning system by developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving community health. The plan guides infrastructure and development investments and will be further detailed by regional Strategic Development Plans (SDPs) and local authority Local Development Plans (LDPs), which are required to be in conformity with Future Wales.

**3.3.2** Future Wales contains a national spatial strategy and introduces four regions in Wales: The North, Mid Wales, The South West and The South East. The plan specifies 'where Wales will grow' (Policy 1) through the identification of national and regional growth areas. For each of the regions the plan highlights key locations for growth, opportunities for development infrastructure and sets a framework for regional and local planning. Future Wales states that: '*National Park Authorities are unique planning entities with a specific remit to reflect the distinctive characteristics of their areas...and that Future Wales policies respect the functions of National Parks in terms of their statutory purposes...*' (page 104).

**3.3.3** The policy framework identifies the following key issues of national importance:

- Strategic placemaking principles (Policy 2)
- Supporting Urban Growth and Regeneration (Policy 3)
- Supporting rural communities and the rural economy (Policies 4 and 5)
- Applying a 'Town Centre first' principle to support town and city centres as multi-functional places (Policy 6)
- Delivering affordable housing (Policy 7). LDPs are required to explore all opportunities to increase the supply of affordable housing and identify affordable housing led developments.
- Flooding (Policy 8) supports investment in new and improved infrastructure promoting nature-based solutions as a priority.
- Resilient Ecological Networks and Green Infrastructure (Policy 9) with the Preseli Hills and woodlands of North Pembrokeshire identified as a National Natural Resource.
- Policy 10 'International Connectivity recognises the importance of the Haven Waterway and Ports as a major national asset and an important international gateway for freight and passengers. It is also recognised that "a diverse high-skill supply chain has developed locally to support the energy sector which is increasingly incorporating the renewable energy sector, and, in particular, marine energy" (page 82).
- Transport policies (11 and 12) are underpinned by the sustainable transport hierarchy for Wales which prioritises active travel and public transport and sets the vision to transition to low emission vehicles.
- Digital infrastructure (policies 13 and 14) supports the delivery of digital communications infrastructure with new developments required to provide Gigabit capable broadband infrastructure.
- National Forest (Policy 15) states the Welsh Government is committed to develop a national forest through the identification of appropriate sites and mechanisms.
- Renewable energy policies 16, 17 and 18 contain strategic spatial and detailed criteria-based policies for the determination of applications.
- Strategic Policies for Regional Planning and Strategic Development Plans (Policy 19)
- Policy 32 'Haven Waterway and Energy' designates the Haven Waterway as a site for potential new developments in renewable and low-carbon energy, fostering innovation and investment.

## **Planning Policy Wales (PPW) Updates**

**3.3.4** Planning Policy Wales (PPW) has been updated twice since adoption of LDP 2 in 2020. Edition 11 (2021) aligned PPW with 'Future Wales: The National Plan 2040' and emphasised sustainable, well-integrated places. Edition 12 (2024) introduced requirements for planning authorities to consider localised issues such as the prevalence second homes and short-term lets, detailed green infrastructure needs, mandated net biodiversity benefits and securing these benefits through a

stepwise approach. Additionally, it provides a strengthened policy approach to the protection for Sites of Special Scientific Interest (SSSI) and guidance on trees and woodlands, with the promotion of new planting. These updates will need to be reflected in future Strategic Development Plans and replacement Local Development Plans and are discussed in more detail in the following chapter on the review of topic areas.

### **Development Plans Manual (Edition 3, March 2020)**

**3.3.5** The updated Manual, published by Welsh Government, provides guidance on the preparation of development plans, including Strategic Development Plans and Local Development Plans. The Manual provides procedural guidance and advice for local planning authorities on the preparation, monitoring and review of a development plan.

### **Revocation of Technical Advice Note (TAN) 1 Joint Housing Land Availability Studies (March 2020)**

**3.3.6** TAN 1 was revoked in its entirety to reflect the changes in PPW which removed the need for the 5-year housing land supply, with Local Planning Authorities now expected to monitor housing delivery through the housing trajectory which is published in the Annual Monitoring Report each year.

### **Revocation of TAN 8 Planning for Renewable Energy (February 2021)**

**3.3.7** TAN 8 was revoked in its entirety following the publication of Future Wales which contains Policies 17 and 18 identifying pre-assessed areas for wind energy and Developments of National Significance.

### **Revocation of TAN 19 Telecommunications (February 2024)**

**3.3.8** TAN 19 was revoked in its entirety to reflect policy guidance and advice now detailed in Future Wales and Planning Policy Wales.

### **TAN 15 Development, flooding and coastal erosion (made Available September 2021)**

**3.3.9** The new TAN will replace the existing TAN 15 and TAN 14 Coastal Planning, including an updated Flood Map for Planning (FMfP) which will replace the

Development Advice Maps. The updated TAN will take account of the risks associated with climate change on coastal flood risk and erosion and to ensure planning decisions take account of the risks. The publication is currently suspended, but once published, will need to inform LDP policy.

## **TAN 11 Air Quality, Noise and Soundscape**

**3.3.10** Updates to TAN 11 have been subject to consultation and are awaiting publication. The changes will bring it in line with PPW policies to improve air quality and creating and maintaining soundscapes to promote health, wellbeing and sustainability. Noise guidance will also be updated.

## **The Infrastructure (Wales) Act (2024)**

**3.3.11** The Infrastructure (Wales) Act streamlines the process for developing major infrastructure projects by establishing a single infrastructure consenting process for specified types of Significant Infrastructure Projects (SIPs) in Wales.

## **Legislative and policy changes on second homes and short-term lets (2022)**

**3.3.12** In October 2022, Welsh Government introduced three new use classes via an amendment to The Town and Country Planning (Use Classes) Order 1987. The three uses now included are:

- Use class C3 (dwelling houses; used as sole or main residences occupied for more than 183 days in a calendar year).
- Use class C5 (Dwelling houses; used otherwise than as sole or main residences covering a dwellinghouse other than as a sole or main residence and occupied for 183 days or fewer in a calendar year i.e. second homes)
- Use class C6 (Short-term lets, covers the use of a dwellinghouse for commercial short-term letting not longer than 31 days for each period of occupation).

**3.3.13** Simultaneously, Welsh Government amended the Town and Country Planning (General Permitted Development) Order 1995 to allow permitted changes between the new use classes - C3, C5 and C6 or a mixture of uses. A local planning authority can withdraw these permitted development rights through an Article 4 Direction, where it is supported by robust evidence.

**3.3.14** PPW has also been amended (edition 12), that where relevant, the prevalence of second homes and short-term lets must be taken into account when considering the housing requirements. Local policy approaches should be explored

to support the viability of communities and could include introducing a cap or ceiling on the number of second homes or short-term lets (paragraph 4.2.5).

### **LDP end dates: letter to local authorities (24 September 2020)**

**3.3.15** A letter from the Welsh Minister clarifies the provisions in the Planning (Wales) Act 2015 regarding plan end dates. The provisions in The Planning (Wales) Act regarding the period to which a plan has effect were commenced on 4 January 2016 and development plans adopted after 4 January 2016, will cease to be the LDP on expiry of the period specified in the plan. For the adopted LDP 2, this will cease to be the adopted development plan after 31 December 2031.

### **Wales Placemaking Charter (2020)**

**3.3.16** The Charter launched in 2020, was developed by the Welsh Government and the Design Commission for Wales in collaboration with the Placemaking Wales Partnership. It was developed to reflect the collective and individual commitment of organisations to support the creation of high-quality places across Wales. The Charter outlines six principles aimed at promoting quality, sustainability, and community in planning and development across Wales. These principles are; community involvement, sustainable locations, prioritising walking, cycling, and public transport, creating safe and welcoming public spaces, promoting a mix of uses, and respecting local identity. The Pembrokeshire Coast National Park Authority is a joint signatory to the Placemaking Charter, alongside the other National Parks in Wales.

### **The Historic Environment (Wales) Act 2023**

**3.3.17** The Historic Environment (Wales) Act 2023 came into force on 4 November 2024 and has repealed the following legislation in Wales:

- The Historic Buildings and Monuments Act 1953
- The Ancient Monuments and Archaeological Areas Act 1979
- The Planning (Listed Buildings and Conservation Areas) Act 1990
- The Historic Environment (Wales) Act 2016

### **State of Natural Resources Report (SoNaRR) for Wales (2020)**

**3.3.18** In 2019, the Welsh Government made a Climate Emergency Declaration and went on to set a target to achieve Net Zero by 2050. In 2021, the Welsh Parliament declared a Nature Emergency in Wales.

**3.3.19** The Environment (Wales) Act 2016 requires LPAs to have regard to the State of Natural Resources Report (SoNaRR) for Wales published by Natural Resources Wales (NRW). The report informs how we can address the dual threats from the climate and nature emergencies and ensure sustainable management of natural resources. The report identifies pressures on natural resources, which include climate change and population growth and outlines opportunities for integrated solutions. The report focuses on how to transform the food system, the energy system and the transport system.

### **Llwybr Newydd: National Transport Strategy (2021)**

**3.3.20** Llwybr Newydd: the Wales Transport Strategy 2021 outlines the Welsh government's vision for the future of transport in Wales. The document sets out the government's ambitions for the next 20 years and its priorities for a 5 year period. The vision is for an accessible, sustainable and efficient transport system. The strategy identifies three priorities:

1. Bring services to people in order to reduce the need to travel
2. Allow people and goods to move easily from door to door by accessible, sustainable and efficient transport
3. Encourage people to make the change to more sustainable transport.

The strategy sets a target for 45 per cent of journeys to be by sustainable means across Wales by 2045.

### **Active Travel Act Guidance (2021)**

**3.3.21** The guidance has been prepared for local authorities on planning and designing networks of walking and cycling routes. The guidance emphasises the integration of active travel considerations to inform the preparation of LDPs, by safeguarding routes, identify proposals for improving infrastructure, ensure new developments are well connected and engage with communities to understand their needs.

### **Electric Vehicle Charging Strategy for Wales**

**3.3.22** The strategy sets out the Welsh Government's vision and plans to support the transition to electric vehicles. Wales aims to significantly increase electric charging infrastructure by 2030 and support the broader goal of achieving net zero emissions by 2050.

## **The Clean Air Plan for Wales: Healthy Air, Healthy Wales (2020)**

**3.3.23** The strategy seeks to improve air quality across Wales and focuses on reducing the impacts of air pollution on human health, biodiversity, the natural environment and the economy. Key objectives of the plan include: reducing emissions from transport, industry and agriculture; promoting active travel and public transport to decrease reliance on private vehicles; implementing clean air zones and low emission zones in urban areas; and raising public awareness about the health impacts of air pollution and encouraging behaviour changes.

## **Welsh Development Quality Requirements, Welsh Government, 2021.**

**3.3.24** The Welsh Development Quality Requirements (WDQR) set standards for all publicly funded affordable homes in Wales to ensure they are built to a high standard. The WDQR 2021, focuses on creating beautiful homes and places and sets space standards and environmental standards in construction and operation.

## **Healthier Wales: Our Plan for Health and Social Care 2021**

**3.3.25** Healthier Wales is the Welsh Government's national plan for health and social care. It envisions a seamless integration of health and social care services, emphasising prevention, wellbeing, and prudent healthcare. It aims to deliver more community-based services, reserving hospital care for essential treatments. The plan highlights the importance of strong partnerships across sectors and sustainable funding to support these transformations, ultimately striving to create a healthier, more resilient population by focusing on keeping people well and providing high-quality, efficient care.

## **Draft Health Impact Assessment (Wales) Regulations 2023**

**3.3.26** The Public Health (Wales) Act 2017 places a duty on Welsh Ministers to make regulations which require public bodies to carry out health impact assessments in specified circumstances. Welsh Government consulted on draft Health Impact Assessment (Wales) Regulations in early 2024 and it is likely that it will become a statutory requirement to undertake a Health Impact Assessment for a development plan.



## **Net Zero Wales**

**3.3.27** Under the Environment (Wales) Act 2015, Welsh Ministers must prepare and publish a report for each budgetary period setting out their policies and proposals for meeting the carbon budget for that period. The Welsh Government's second emissions reduction plan for 2021 to 2025, sets the foundations to make Wales net zero by 2050. The key focus is on energy efficiency, renewable energy, transport, agriculture and waste management.

## **Working together to reach net zero: All Wales Plan 2021-2025**

**3.3.28** Pledges commitment from partners across Wales to achieve net zero.

## **Beyond Recycling (March 2021) Strategy**

**3.3.29** Beyond Recycling sets out the Welsh Government's commitment to accelerate the transition to a circular, low carbon economy and sets out the key steps required over the next 10 years.

## **Natural Resources Wales' guidance on phosphate pollution in Riverine Special Areas of Conservation (2021)**

**3.3.30** In January 2021, Natural Resources Wales (NRW) introduced stricter targets for phosphate pollution in riverine Special Areas of Conservation (SACs). NRW issued guidance to Planning Authorities for determining planning applications, stating new development must not increase phosphate levels in rivers. In Pembrokeshire, the Teifi and Eastern and Western Cleddau river catchments were found to be failing the revised water quality targets for phosphorus. In January 2024 updated guidance to include the assessment of other water quality attributes against targets in SAC rivers including the assessment of ammonia discharge into SAC rivers.

## **Brexit and changes to the Habitats Regulations**

**3.3.31** After Brexit, the Habitats Regulations in the UK underwent several changes to ensure they continued to function effectively outside the EU framework. Key changes include:

- **Transfer of Functions:** Responsibilities previously held by the European Commission were transferred to the Secretary of State for the Environment, Food and Rural Affairs and Welsh Ministers.
- **National Site Network:** A national site network was created, comprising existing protected sites (previous NATURA 2000) and any new ones designated under the regulations.
- **Management Objectives:** New management objectives were established for the national site network to ensure its effective management and adaptation.
- **Special Areas of Conservation (SACs):** The process for designating SACs was amended.
- **Reporting and Compliance:** New arrangements were made for reporting on the implementation of the regulations, as the UK no longer reports to the European Commission.
- **Imperative Reasons of Overriding Public Interest (IROPI):** The European Commission's role in the IROPI test was replaced by national authorities.

### **The Climate Change (Wales) Regulations 2021**

**3.3.32** In February 2021 the Welsh Government laid regulations before the Senedd, which commit Wales to tighter climate change targets by 2050, as a response to the advice by the UK Climate Change Committee (CCC). This is the second set of regulations under the Environment (Wales) Act 2016, following the 2018 regulations which targeted an 80 per cent reduction by 2050, deemed insufficient. The key regulations include amending the 2050 emissions target to net zero, updating interim targets for 2030 and 2040 to 63 per cent and 89 per cent reductions respectively, setting stricter limits for Carbon Budget 2 (2021-2025), introducing Carbon Budget 3 (2026-2030), and setting a 0 per cent offset limit for Carbon Budget 2.

### **UK Climate Change Risk Assessment (CCRA3) 2022 – Summary For Wales**

**3.3.33** The UK Climate Change Risk Assessment (CCRA3) is the third comprehensive assessment of climate risks facing the UK, published by the Climate Change Committee (CCC). The Summary for Wales report highlights the specific risks and opportunities for Wales and will serve as a critical foundation for developing a strategic framework aimed at addressing the impacts of climate change and enhancing resilience in Wales.

### **Climate Adaptation Strategy for Wales (2024)**

**3.3.34** The Climate Adaptation Strategy for Wales outlines the national approach to adapting to the impacts of climate change, building resilience, and ensuring a sustainable future for its people, economy, and environment. The strategy aims to provide a framework for addressing the current and future impacts of climate change

in Wales, ensure that Wales is resilient to climate risks, and align with Wales' broader climate goals, including achieving net-zero emissions by 2050.

### **The Welsh National Marine Plan (WNMP) – 2019**

**3.3.35** Adopted in November 2019, it sets out a long-term vision for the sustainable development of Welsh inshore and offshore marine areas. As Wales' first marine plan, it marks the beginning of a process to shape Wales' seas in support of the UK's vision of clean, healthy, safe, productive, and biologically diverse oceans and seas. The plan was prepared and adopted under the Marine and Coastal Access Act (MCAA) 2009, specifically for Section 51 and in accordance with Schedule 6 of the MCAA, and it conforms to the UK Marine Policy Statement (MPS) 2. Applications within marine areas should use the Plan and its supporting materials to shape proposals. Public authorities must use the WNMP to guide decision-making, while other users can refer to the policies set out in the plan to understand the Welsh Government's strategy for the sustainable development of the Plan area.

### **The Local Government and Elections (Wales) Act 2021**

**3.3.36** The Local Government and Elections (Wales) Act 2021 established Corporate Joint Committees (CJCs) for four regions in Wales. The South West Wales Corporate Joint Committee is a separate legal body with was formally constituted in January 2022 and covers the local authority areas of Carmarthenshire, Neath Port Talbot, Pembrokeshire and Swansea, as well as the Pembrokeshire Coast National Park Authority and Bannau Brycheiniog.

### **Town and Country Planning (Strategic Development Plan) (Wales) Regulations 2021**

**3.3.37** The Town and Country Planning (Strategic Development Plan) (Wales) Regulations came into force on 28 February 2022. The Regulations set out the procedural requirements for the preparation of Strategic Development Plans (SDPs).

### **Socio-economic Duty (March 2021)**

**3.3.38** Following 31 March 2021, a range of public sector bodies are subject to the Socio-economic Duty in section 1 of the Equality Act 2010. The duty aims to support the most vulnerable members of society, by requiring strategic decision makers have a clear audit trail to demonstrate they have regard to how their decisions might help reduce the inequalities associated with socio-economic disadvantage.

## **Biodiversity Deep Dive**

**3.3.39** The Welsh Government's Biodiversity Deep Dive committed delivery of the 30 by 30 target, to protect, effectively and equitably manage 30 per cent of Wales' land, freshwater and seas by 2030 as a strategic focus to consider where and how action could be accelerated.

## **The Water Resources (Control of Agricultural Pollution) (Wales) 2021 Regulations**

**3.3.40** The Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021 applies to all land within Wales therefore the regulations will apply to all fields in Wales. The regulations revoke and replace the Nitrate Pollution Prevention (Wales) Regulations 2013 and came into force on 1 April 2021 with transitional periods for some measures to 1 August 2024. The regulatory measures seek to address agricultural pollution.

## **3.4 Regional Changes**

### **Corporate Joint Committee (CJC) for South West Wales**

**3.4.1** The South West Wales CJC, established in 2022 has prepared and adopted the South West Wales Regional Energy Strategy and the South West Wales Regional Economic Delivery Plan. The CJC is also preparing a Regional Transport Plan for consultation in 2024/25 and the Strategic Development Plan.

### **The South West Wales Regional Energy Strategy, (SWW CJC), 2022**

**3.4.2** The South West Wales Regional Energy Strategy was adopted in April 2022. The Strategy identifies key interventions to deliver the region's ambitions for decarbonising its energy system. The plan identifies six priorities; energy efficiency, electricity generation, smart and flexible systems, decarbonise heat, decarbonise transport and regional co-ordination. The Energy Vision scenario has been modelled to set out a decarbonisation route to ensure the region can achieve a net zero energy system by 2050.

## **The South West Wales Regional Economic Delivery Plan, 2022**

**3.4.3** The South West Wales Regional Economic Delivery Plan was adopted in January 2022 and serves as the overarching economic regeneration policy for the region up to 2030. The Plan aims to foster a resilient, broad-based and sustainable economy in the region. The Plan sets the following ambitions to 2030: to be a leader in renewable energy, to establish a resilient business base and strengthen and embed local businesses and to enhance the region's cultural and environmental assets to boost tourism and local experiences. The Plan identifies the region's natural assets, including the Pembrokeshire Coast National Park. The plan highlights the importance of the natural assets in promoting tourism and enhancing the region's cultural and environmental appeal. The strategic priorities of the plan is for economic growth to address structural weaknesses and leverage unique strengths including the energy potential and university-industrial links and ensure collaboration among businesses, government, education and community organisations. Actions and interventions emphasise sustainability and inclusivity.

## **South West Wales Regional Transport Plan**

**3.4.4** The South West Wales Regional Transport Plan 2025-30 is currently being drafted and will replace the existing Joint Transport Plan. It will provide a strategic framework for improving connectivity across the region and must align with the Llwybr Newydd, the Wales Transport Strategy 2021. A draft plan is due for public consultation in late 2024/ 2025. The draft key objectives of the plan are; economic growth, to promote sustainable transport options with a shift from the private car to sustainable modes of transport and active travel and ensure that transport networks are inclusive and accessible to all.

## **South West Wales Strategic Development Plan**

**3.4.5** The South West Wales CJC is required to prepare a Strategic Development Plan. The SDP will have development plan status and must be in conformity with Future Wales: The National Plan 2040 and future LDPs must be in conformity with an adopted SDP. The SDP will focus on strategic planning issues in the region, including economic growth, housing, transport and environmental sustainability. The plan will identify strategic areas of growth and strategic allocations. There is currently no timetable for preparation of the SDP.

## **Regional technical Statements for the North Wales and South Wales Regional Aggregates Working Parties (Second Review) September 2020**

**3.4.6** The purpose of the RTS is to ensure that there is an adequate and steady supply of aggregates for the construction and other industries, taking into account the key objectives of the sustainable supply of minerals as set out in the Minerals Technical Advice Note 1 (MTAN1).

### **Celtic Freeport – The Daugleddau Estuary**

**3.4.7** In September 2022, the UK and Welsh Governments invited proposals for Freeport(s) to be established in Wales. The successful Celtic Freeport bid was prepared by a public sector / private sector consortium comprising Associated British Ports, Neath-Port Talbot Council, Pembrokeshire County Council and the Port of Milford Haven. The Freeport's governance structures were established in 2023, with the final business case submitted and the Freeport designated in 2024. It is expected to generate significant economic benefits, including £900 million in Gross Value Added (GVA) by 2030 and £13 billion by 2050. This initiative represents a significant opportunity for Pembrokeshire, aligning with the aspirations of both the UK and Welsh Governments to drive energy transition and economic growth.

### **South West Wales Area Statement (Natural Resources Wales), 2020**

**3.4.8** The South West Wales Area Statement covers the local authority areas of Swansea, Neath Port Talbot, Pembrokeshire and Carmarthenshire. It identifies the key risks, opportunities and priorities for building resilience of ecosystems and supporting the sustainable management of natural resources under four themes:

1. Reducing health inequalities
2. Ensuring sustainable land management
3. Reversing the decline of, and enhancing biodiversity
4. Mitigating and adapting to climate change

### **Marine Area Statement (Natural Resources Wales) 2020**

**3.4.9** The Marine Area Statement covers the inshore waters of Wales extending out 12 nautical miles and making up 43% of the Welsh territory. It's the first Marine Area Statement of its kind in Wales and seeks to guide the sustainable management of Wales' marine environment through the themes of:

1. Building resilience of marine ecosystems
2. Nature-based solutions and adaptation at the coast
3. Making the most of marine planning

**3.4.10** Each section is supported by evidence that is presented on the Wales Environmental Information Portal.

## **3.5 Local Changes**

### **Pembrokeshire Wellbeing Plan (Pembrokeshire Services Board), 2023**

**3.5.1** The Pembrokeshire Wellbeing Plan 2023 sets out how public and private sector partners will work together to improve economic, social, environmental and cultural wellbeing in Pembrokeshire. The plan focuses on three main project areas:

1. Reducing poverty and inequalities
2. Strengthening communities
3. Tackling climate change and the nature emergency.

### **Pembrokeshire Climate Adaptation Strategy (Public Services Board), July 2022**

**3.5.2** The document is a County-wide Pembrokeshire Climate Adaptation Strategy to be delivered between 2022 and 2024 by the Pembrokeshire Public Services Board and its constituent partners alongside other public bodies, community groups and businesses across the County. It provides a strategic approach to increase the resilience of Pembrokeshire to the effects of climate change and to prepare for specific climate risks. 61 risks have been examined, with 39 priorities identified and 24 specific actions in addition to current and planned activity.

### **National Park Authority Corporate Plan 23/24-26/27**

**3.5.3** The NPA Corporate Plan sets out the corporate wellbeing objectives (a requirement of the Wellbeing of Future Generations Act) and the steps required to support the delivery of the objectives and how the Authority will apply the sustainable development principle five ways of working in authority activities.

### **Pembrokeshire Coast National Park: Draft Partnership Plan (2024)**

**3.5.4** The Environment Act 1995 requires the National Park Authority to prepare a Management Plan for the National Park. The current Management Plan is for 2020-2024 and the National Park Authority has consulted on a draft replacement plan, which will be called a Partnership Plan for 2025-2029. The draft Partnership Plan sets out the purposes of the National Park, the action to be taken over the next five

years, the partners involved and the measures of success. The policies and actions are grouped under four priorities: conservation, connection, communities and climate.

## **Supplementary Planning Guidance**

**3.5.5** Since Local Development Plan 2 was adopted in September 2020, a number of Supplementary Planning Guidance documents have been adopted to support Plan policies. These include:

- Archaeology (with Pembrokeshire County Council)- Adopted May 2021
- Biodiversity (with Pembrokeshire County Council) -Adopted May 2021
- Caravan, Camping and Development- Adopted May 2021
- Coal Works – Instability- Adopted October 2022
- Conservation Areas (includes 13 Conservation Area documents)- Adopted October 2022
- Loss of Hotels -Adopted September 2023
- Parking -Adopted May 2021
- Regionally Important Geodiversity Sites Adopted- October 2022
- Renewable Energy- Adopted May 2021
- Safeguarding Mineral Zones- Adopted October 2022
- Seascape Character -Adopted September 2023
- Sustainable Design and Development- Adopted May 2021
- The Cumulative Impact of Wind Turbines- Adopted October 2022
- Place Plans- Community Land Trusts -Adopted May 2021
- Tree and Woodland Guidance -Adopted September 2023

## **Green Infrastructure Assessment (Land Use Consultants for Pembrokeshire County Council and Pembrokeshire Coast National Park Authority), 2022**

**3.5.6** The Green Infrastructure Assessment was commissioned for Pembrokeshire with the main goal to create a healthier, more resilient environment by strategically managing and enhancing green infrastructure. The assessment focuses on identifying strategic green infrastructure, produced settlement management plans, urban tree planning and pollinator strategies for 11 main settlements in Pembrokeshire, including Tenby, Saundersfoot, St Davids and Newport in the National Park.

## **Pembrokeshire Destination Management Plan 2020-2025**



**3.5.7** The Visit Pembrokeshire Destination Management Plan sets out the actions required to grow tourism for the benefit of Pembrokeshire by setting clear priorities and a shared stakeholder vision.

### **Draft Local Housing Market Assessment for Pembrokeshire (LHMA) (2023)**

**3.5.8** Pembrokeshire County Council as the Housing Authority has undertaken a review of local housing needs in Pembrokeshire, including the Pembrokeshire Coast National Park. The draft LHMA follows the new prescribed methodology and template published by Welsh Government. The LHMA Toolkit calculates the need for future affordable and market housing utilising evidence of existing unmet affordable housing need from the Housing Register and estimates newly arising need for both affordable and market tenures. The LHMA considered six scenarios; three demographic scenarios based on the Welsh Government's household projections and three LDP growth scenarios. The results show:

- A significant existing, unmet affordable need, which is substantially larger than the forecast newly arising need.
- The majority of affordable housing need is for social rented properties
- A substantial need for affordable, one-bedroom properties

The Draft LHMA is awaiting approval from Welsh Government.

### **Pembrokeshire's Local Housing Strategy (Pembrokeshire County Council), 2023**

**3.5.9** The Local Housing Strategy for Pembrokeshire was published in 2023 and focuses on the following areas:

1. Increasing affordable housing
2. Prevent and alleviate homelessness
3. Improving the quality and sustainability of housing
4. Support people to live independent living
5. Reduce the carbon footprint of housing stock by 2033

### **Pembrokeshire Local Area Energy Plan (prepared by ARUP on behalf of Pembrokeshire County Council)**

**3.5.10** The LAEP explores the potential of hydrogen, and the document outlines short and long term route-maps to achieve a net zero carbon energy system by 2050.

### 4.1 Vision and Objectives

**4.1.1** The adopted Local Development Plan identifies the key issues and opportunities that need to be addressed over the Plan period as a result of evidence gathering and extensive public engagement, as well as being informed by national, regional and local policy, strategies and plans. Issues were identified under six broad priority areas of:

- special qualities;
- development and the potential for growth;
- climate change, sustainable design, renewable energy and flooding;
- visitor economy, employment and rural diversification;
- affordable housing and housing growth; and
- community facilities and retail.

**4.1.2** The vision acknowledges that in order to respect and, where possible, enhance the special qualities, opportunities for development are limited and the Park's population will not be able to increase significantly. Those opportunities are made available for development that contributes most to sustaining local communities where they are compatible with the statutory National Park purposes.

**4.1.3** The LDP vision is achieved through 21 objectives grouped by the six priority areas and set within the context of achieving the National Park purposes. 16 key outcomes identify what the Authority anticipates what will be achieved during the Plan period.

**4.1.4** The National Park's statutory purposes to conserve and enhance the National Park and promote opportunities for the understanding and enjoyment of the special qualities will remain the overall objective of the Plan and will underpin the plan's vision, objectives and strategy. It is not anticipated that there will be significant changes to the vision, objectives and strategy, however, it will be necessary to review the key issues in the area and the vision and objectives in the light of updates to national, regional and local policy, including the Plan's relationship to Future Wales, Planning Policy Wales and the National Sustainable Placemaking outcomes as well as the local wellbeing plan, the Authority's updated Partnership (Management) Plan, the National Park's Corporate Plan. Evidence gathering and engagement with stakeholders will identify the key issues the plan must seek to address.

## 4.2 Spatial Strategy

**Policy 2 Tenby Service and Tourism Centre (Tier 1) (Strategy Policy)**

**Policy 3 Newport Local Centre (Tier 2) (Strategy Policy)**

**Policy 4 Saundersfoot Local Centre (Tier 2) (Strategy Policy)**

**Policy 5 St Davids Local Centre (Tier 2) (Strategy Policy)**

**Policy 6 Rural Centres (Tier 3) (Strategy Policy)**

**Policy 7 Countryside (Tier 4) (Strategy Policy)**

### Review of Topic Area:

**4.2.1** The spatial strategy of the adopted LDP 2 is based on the settlement hierarchy contained in the Wales Spatial Plan, which was revoked in 2021 upon publication of Future Wales. The LDP 2 strategy combines the need for environmental protection with a balanced and sustainable approach to the delivery and distribution of new development. The strategy identifies four settlement tiers with new housing provision focussed on the higher tiers of the hierarchy in line with sustainability principles:

- Tier 1: Service and Tourism Centres
- Tier 2: Local Centres
- Tier 3: Rural Centres
- Tier 4: Countryside

**4.2.2** Policies 2 to 7 set out the strategic policies to ensure appropriate development is directed to the relevant tier of the hierarchy. The growth strategy seeks to ensure that Tenby, Saundersfoot, St Davids and Newport maintain their position relative to one another and larger centres outside the area. Within Rural Centres, smaller scale opportunities for development may be acceptable. Policy 7 is a criteria based policy to control development in the countryside.

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What needs changing (issues/no issues) and how the AMR is performing in these areas:

**4.2.3** AMR indicator 29 sets a target for 90 per cent of housing completions to be focused in the Plan's Centres with the trigger met if 20 per cent of completions are recorded in the countryside by formal Plan Review period. The figures at Plan Review are 17 per cent of completions in the countryside (83 per cent in the Plan's

Centres). As such, the trigger has not been met, and housing completions are in line with the spatial strategy.

**4.2.4** In monitoring period 2022-23, there were a large number of completions in the countryside (69 per cent). This was due to the completion of an Affordable Housing Exception Site which was granted permission in compliance with Policy 49 of the Plan.

**4.2.5** It is therefore considered that the spatial strategy of the Plan and Policies 2 to 7 are performing effectively and as intended.

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What parts of the evidence base need updating in line with recent contextual changes:

**4.2.6** The spatial strategy requires a review and potential revision as it was based on the Wales Spatial Plan which was revoked in 2021. The strategy needs to be in general conformity with Future Wales and align with LDPs in neighbouring authorities.

**4.2.7** The review of the spatial strategy will need to be informed by the issues affecting the National Park's communities. Data from the recent Census will be collated to consider a range of social and economic issues affecting the Park's communities, for example, housing availability and affordability, Welsh language and culture and job opportunities to inform the strategy.

**4.2.8** An assessment of available services and facilities in settlements will be undertaken in order to develop a settlement hierarchy and direct growth to the most sustainable places.

**4.2.9** An urban capacity study will be required to consider the capacity and impact of growth on the special landscape of the National Park. Growth will be delivered in line with the national sustainable placemaking outcomes and respond to the climate and nature emergencies.

## 4.3 Priority A: Special Qualities

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### Policy 8 Special Qualities

Review of Topic Area:

**4.3.1** The Special Qualities of the National Park are those characteristics and features of the National Park which individually or in combination contribute to making this National Park unique. These are identified as:

Coastal splendour	Richness of habitats and biodiversity
Diverse geology	Islands
Diversity of landscape	Accessibility
Distinctive settlement character	Space to breathe
Rich historic environment	Remoteness, tranquillity and wildness
Cultural heritage	The diversity of experiences and combination of individual qualities

Policy 8 seeks to ensure that the special qualities are conserved and enhanced where development is permitted.

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What needs changing (issues/no issues) and how the AMR is performing in these areas:

**4.3.2** Over the three AMR monitoring periods there have been four planning applications approved contrary to any criterion in Policy 8. One was in AMR 1, with the trigger of two not being reached, and a further three in AMR 2, with the trigger of two being breached. It should be noted that two of the three decisions in the second AMR monitoring period were identical applications on 2 separate properties.

**4.3.3** Member training was carried out after AMR period 2 with regard to special qualities and no planning applications contrary to Policy 8 were approved in AMR period 3. The policy is therefore performing as intended.

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What parts of the evidence base need updating in line with recent contextual changes:

**4.3.4** The Special Qualities were identified in the National Park Management Plan. The Management Plan (now Partnership Plan) for 2025-2030 is currently in draft form. Following public consultation in early 2024, the special qualities of the National Park have been updated and include a greater emphasis on Welsh language and dialects and on the sensory environment of the National Park, including big seascapes, the sensitivity of the sea horizon to development, characteristic soundscapes and dark skies.

**4.3.5** Policy 8 will require revision to take account of the additional and updated special qualities.

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## Policy 9 Light Pollution

### Review of Topic Area:

**4.3.6** Policy 8 (Special Qualities) seeks to conserve and enhance the special qualities of the National Park. The visibility of the dark night sky contributes to the sense of remoteness and tranquillity of the National Park with criterion a) of Policy 8 seeking to ensure that this special quality is not lost and is wherever possible enhanced.

**4.3.7** Policy 9 seeks to protect the National Park, and minimise the impact on protected species from light pollution as a result of external artificial lighting.

**4.3.8** The National Park has eight Dark Sky Discovery Sites and is committed to reducing light pollution which will deliver biodiversity benefits as well as reducing costs and reducing carbon emissions. In addition, a Dark Skies Officer was appointed in 2023 to audit and monitor light pollution as well as enable replacement of non-Dark Sky friendly lighting within the National Park.

**4.3.9** National Park Officers are part of an All-Wales Dark Sky Working Group working on a Good Practice Guide which will be published by Welsh Government in 2025.

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### What needs changing (issues/no issues) and how the AMR is performing in these areas:

**4.3.10** The National Park Authority considers that the control of internal lighting (and amount of glazing) to further protect the National Park and minimise the impact on protected species from light pollution. Dark skies have been identified as an updated special quality.

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### What parts of the evidence base need updating in line with recent contextual changes:

**4.3.11** Policy 9 will require revision to include the potential for light pollution from internal lighting and poor design. Supplementary Planning Guidance on Light Pollution will also be reviewed.

**4.3.12** Revisions to Policy 29 (Sustainable Design) will also be required.

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## Policy 10 Sites and Species of European importance

## Policy 11 Nationally protected sites and species

## Policy 12 Local Areas of Nature Conservation or Sites of Geological Interest

### Review of Topic Area:

**4.3.13** Policies 10, 11 and 12 provide a framework for the protection of European, national and locally designated areas of importance for nature conservation.

**4.3.14** Since the base date of LDP 2 in 2015, the Welsh Government declared a climate emergency in 2019 and a nature emergency in 2021. These declarations, together with The Environment (Wales) Act 2016, has informed changes to national policy.

**4.3.15** Future Wales, Policy 9 'Resilient Ecological Networks and Green Infrastructure' seeks to ensure collaboration of partners to take a strategic approach to safeguard ecological networks, secure net benefit for biodiversity and adapt to climate change and improve air quality. Future Wales identifies the Preseli Hills and the woodlands of northern Pembrokeshire as a National Natural Resource that provides multiple ecosystem services from flood alleviation, carbon storage and sequestration, as well as recreation and food provision. The LDP will be required to identify and protect the National Natural Resource as well as develop appropriate local policies to strengthen the ecological network and ecosystem.

**4.3.16** Planning Policy Wales (edition 12) was updated in February 2024, to take account of The Environment (Wales) Act 2016, section 6 duty for public authorities to seek to maintain and enhance biodiversity in the exercise of their functions and promote the resilience of ecosystems. Revised national policy requires local planning authorities to:

- Prepare a Green Infrastructure Assessment to develop a spatial inventory and maps of existing green infrastructure, ecological assets and networks. This information should identify key strategic opportunities to protect, retain, restore, create and connect green features.
- Secure a net benefit for biodiversity through the application of the step-wise approach for all development proposals from the baseline state, proportionate in scale and nature to the proposed development. All development proposals must submit a proportionate green infrastructure statement.
- Develop strengthened policies to protect Sites of Special Scientific Interest, Trees and Woodlands and Green Infrastructure.
- Take account of the priority areas for action in the Area Statement in the LDP.

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What needs changing (issues/no issues) and how the AMR is performing in these areas:

**4.3.17** Policies 10, 11 and 12 will be revised to ensure they align with the new national policy guidance regarding the protection for Sites of Special Scientific Interest. Following Brexit, there is a need for a factual update to change references from European sites to the National Site Network.

**4.3.18** There are a number of challenges regarding water quality, with increased amounts of nitrates and pollution from urban development and agriculture entering the river environment from additional wastewater or land management. There are now stricter controls on water quality in Riverine Special Areas of Conservation (SAC) and new guidance is also awaited for Marine Special Areas of Conservation. A new policy is required on the need to consider how development will affect water quality and river SACs.

**4.3.19** To take account of the recent changes to national policy, the plan revision will utilise information from the Green Infrastructure Assessment for Pembrokeshire to identify strategic green infrastructure and habitats of principal importance (under Section 7 of the Environment (Wales) Act 2016) in the National Park. The plan will identify areas for protection or enhancement of strategic green infrastructure and opportunities for the creation of green infrastructure or habitat creation, both at a strategic and local scale. This will help to reverse biodiversity decline, address the climate and nature emergencies and contribute to placemaking and the provision of wider social, cultural and economic benefits. Policies will also be drafted to reflect the requirement to secure net benefit for biodiversity through the step-wise approach and specify the requirement for a green infrastructure statement. A new policy on Trees and Woodlands may be required. Green infrastructure policies will encompass the protection and enhancement of biodiversity and geodiversity, open space, flooding, landscape and placemaking.

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What parts of the evidence base need updating in line with recent contextual changes:

**4.3.20** The review will develop policies on strategic green infrastructure in order to respond to the nature and climate emergencies, Future Wales and changes to PPW (edition 12). A new policy to assess and control the impact of development and nutrients on water quality is also required. LDP policies will draw evidence from NRW's Area Statement and the Green Infrastructure Assessment and work collaboratively with key stakeholders.



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## Policy 13 Welsh Language

### Review of Topic Area:

**4.3.21** The Welsh Government's aims and ambitions are set out in the Welsh Language Strategy – Cymraeg 2050 which sets a target of one million Welsh speakers by 2050. This will be achieved in part by providing Welsh speakers with easily accessible opportunities to use their skills in social and work settings and creating favourable circumstances to encourage the number of Welsh speakers.

**4.3.22** Policy 13 of LDP2 protects against developments which would have a significant effect on the Welsh Language. The Plan identifies 18 Town and Community Council Areas as 'Welsh-language – Sensitive Areas' where Welsh speakers constitute 19.2 per cent of the population as identified in the 2011 Census and seeks to protect the Welsh Language in these areas as one of the National Park's special qualities.

**4.3.23** The Policy states that proposals likely to have a significant effect on the Welsh Language will be subject to a Welsh Language Impact Assessment.

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### What needs changing (issues/no issues) and how the AMR is performing in these areas:

**4.3.24** Over the three AMR monitoring periods there have been no planning permissions relating to development in Welsh Language-Sensitive Areas being granted contrary to the plan. As such, Policy 13 is functioning effectively.

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### What parts of the evidence base need updating in line with recent contextual changes:

**4.3.25** It is considered unlikely that the evidence base will have changed significantly, however, the most up-to-date Census statistical data relating to the percentage of Welsh-speaking population in the National Park will need to be reviewed to determine if the existing Welsh Language-Sensitive Areas require amendment and a consideration of whether the development thresholds require revision.

**4.3.26** A Welsh Language Impact Assessment will also need to be undertaken and Welsh language considerations will be integrated into the ~~considered as part of the Integrated~~ Sustainability Appraisal for the Replacement LDP.

**4.3.27** Potential changes in other policy areas will be considered for impacts in the Welsh Language Impact Assessment. The Welsh Language (Wales) Measure will be adhered to when revising the LDP.

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## **Policy 14 Conservation and Enhancement of the Pembrokeshire Coast National Park**

### **Review of Topic Area:**

**4.3.28** Policy 14 seeks to ensure that the qualities of the National Park are not lost to future generations and permits development where there are no unacceptable adverse effects on the qualities and the special landscape and seascape character, including the historic environment. Consideration of the impact of cumulative impact are given special consideration. The policy is supported by Supplementary Planning Guidance on both Landscape Character and Seascape Character.

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**What needs changing (issues/no issues) and how the AMR is performing in these areas:**

**4.3.29** Over the three AMR monitoring periods there have been two planning applications approved contrary to Policy 14, one in AMR period 1 and one in AMR period 2. The trigger of two applications was not breached in either year.

**4.3.30** Member training was carried out after AMR period 2 with regard to landscape and seascape and no planning applications contrary to Policy 14 were approved in AMR period 3. The policy is therefore performing as intended.

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**What parts of the evidence base need updating in line with recent contextual changes:**

**4.3.31** Policy 14 will require review to ensure that it continues to protect the qualities and special landscape and seascape of the National Park. Consideration will be given to the need for a new policy to protect the historic landscape of the National Park.

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## **Policy 15 Open Space**

## **Policy 16 Green Wedges**

## Review of Topic Area:

**4.3.32** Policy 15 of the LDP requires the protection of existing open space and for the provision of new open space on housing developments of 10 or more dwellings. The policy is supported by Supplementary Planning Guidance on Planning Obligations which identifies where open space planning obligations will be required to provide for future needs as a consequence of additional development in communities.

**4.3.33** Planning Policy Wales (Edition 12, February 2024) identifies open space as being one of the functions that can be served by green infrastructure, facilitating health and wellbeing benefits as well as improving resilience of ecosystems, improving air quality, reduced noise pollution and climate change mitigation.

**4.3.34** Policy 16 of the LDP designates Green Wedges to prevent the coalescence of centres, protects the setting of centres and safeguards the countryside.

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### What needs changing (issues/no issues) and how the AMR is performing in these areas:

**4.3.35** Over the three AMR monitoring periods there have been no planning permissions relating to open space or green wedges being granted contrary to the plan. As such, Policies 15 and 16 are functioning effectively.

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### What parts of the evidence base need updating in line with recent contextual changes:

**4.3.36** An updated Open Space Assessment will be required to identify existing open space and where there are shortfalls.

**4.3.37** Green Wedges will also require review to ensure that they are still appropriate.

**4.3.38** The Replacement LDP will also need to consider policies on Green Infrastructure which should encompass the protection of biodiversity and geodiversity, open space, flooding, landscape and placemaking, recognising the multi-functional role green infrastructure has on environmental, economic and social wellbeing.

## 4.4 Priority B: Major Development, the potential for growth

### Policy 20 Scale of Growth

#### Review of Topic Area:

**4.4.1** The Pembrokeshire Coast National Park has been increasingly unable to accommodate demand due to landscape sensitivity issues. In National Parks, special considerations apply to major development proposals which are more national than local in character. Planning Policy Wales sets out the tests for major development. Development types which are most likely to have an impact strategically in the National Park have been identified in the Plan as housing, employment, renewable energy, camping and caravanning, minerals development, coastal development and retail.

**4.4.2** Policy 20 permits the development of shore-based facilities within developed areas of the coast, with the exception of marina developments which are not considered appropriate on the sensitive coast, waste facilities that predominantly serve the National Park and small and medium scale renewable energy. Opportunities for large scale renewable energy are extremely limited within the National Park.

**4.4.3** Major development, including minerals development, will only be permitted in exceptional circumstances.

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#### What needs changing (issues/no issues) and how the AMR is performing in these areas:

**4.4.4** Over the three AMR monitoring periods there have been no planning permissions relating to proposals that would engage the Major Development Test being granted contrary to the plan. As such, Policy 20 is performing as intended.

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#### What parts of the evidence base need updating in line with recent contextual changes:

**4.4.5** The Major Development Test as set out in national planning policy has not changed and therefore it is considered that Policy 20 does not require revision.

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## **Policy 21 Minerals Safeguarding**

## **Policy 22 Buffer Zones**

## **Policy 23 Borrow Pits**

## **Policy 24 Local Building Stone**

## **Policy 25 Recycled, Secondary and Waste Materials**

## **Policy 26 Inactive Mineral Sites**

### **Review of Topic Area:**

**4.4.6** The LDP contains a number of policies relating to minerals. Policy 21 sets out the policy approach to safeguarding minerals, Policy 22 relates to development in mineral buffer zones, Policy 23 deals with borrow pits and Policy 24 relates to quarrying for local building stone. Policy 25 encourages the use of recycled, secondary and waste materials and Policy 26 deals with inactive minerals sites.

**4.4.7** Future Wales identifies the importance of the minerals products industry in supporting the Welsh construction sector while recognising that more will need to be done to increase the use of secondary and recycled materials to achieve a circular economy.

**4.4.8** The Regional Technical Statement (2nd Review, September 2020) provides updated projections relating to forecast consumption of minerals and sets out recommendations for the apportionments needed to be supplied from each area and the nature and size of any allocations that are required in the LDP to ensure there is an adequate provision of minerals. In line with Planning Policy Wales, the RTS states that landbanks do not need to be maintained, nor should there be any future allocations within the National Park (except in exceptional circumstances).

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### **What needs changing (issues/no issues) and how the AMR is performing in these areas:**

**4.4.9** Over the three AMR monitoring periods there have been no planning permissions relating to minerals development being granted contrary to the plan. As such, the LDP policies relating to minerals development are performing as intended.

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What parts of the evidence base need updating in line with recent contextual changes:

**4.4.10** The Regional Technical Statement (2nd Review, September 2020) was adopted after the adoption of the LDP. The Pembrokeshire Coast National Park is now part of the West Wales region which comprises the National Park, Pembrokeshire and Ceredigion, with a recognition that beyond the current permitted reserves, sand and gravel production should be reduced in the National Park ~~with future reserves needing to be supplied by Pembrokeshire and Ceredigion~~. Future reserves of sand and gravel would fall to Ceredigion (in line with the RTS), although Pembrokeshire County Council has indicated a willingness to contribute as evidenced by the LDP 2, Deposit Plan 2 extension proposal for Trefigin Quarry and its approach to Areas of Search for sand and gravel.

**4.4.11** The RTS also states that the region should work collaboratively with neighbouring Local Planning Authorities to ensure there are adequate future supplies. This will be taken forward through a Statement of Sub-regional Collaboration (SSRC) prepared jointly for the West Wales sub-region as defined by the RTS 2nd Review. Considerable work has already been undertaken on the SSRC for the West Wales sub-region, which may vary the provisions as set in in RTS 2<sup>nd</sup> Review. The SSRC would be subject to consultation with the SWRAWP. It is recognised that current sand and gravel quarries within the National Park will continue to operate for the remainder of their permissions.

**4.4.12** Policies 21-26 will need to be reviewed but are unlikely to require revision.

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## Policy 27 Waste

## Policy 28 Composting

### Review of Topic Area:

**4.4.13** Policy 27 provides the policy framework for waste management in the National Park and allows local waste management and recycling facilities which predominantly serve the National Park area. Sub-regional waste management facilities exclude the National Park as an appropriate location and Pembrokeshire's waste management is predominantly dealt with by Pembrokeshire County Council.

**4.4.14** The National Park is part of the Mid and South-West Wales area for planning and monitoring waste. Information on the region's waste management and resources recovery facilities is required in order to monitor implementation of 'Towards Zero Waste'.

**4.4.15** In March 2021, Welsh Government published ‘Beyond Recycling – A strategy to make the circular economy in Wales a reality’ which emphasises the aim of keeping resources in use for as long as possible and avoiding waste.

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What needs changing (issues/no issues) and how the AMR is performing in these areas:

**4.4.16** Over the three AMR monitoring periods there have been no planning permissions relating to waste management facilities being granted contrary to the plan. As such, Policy 27 is functioning effectively.

**4.4.17** The Mid and South-West Wales region monitoring report (2023-24) shows that Pembrokeshire is already meeting the 70 per cent 2024/25 target for recycling and has done for the past three years.

**4.4.18** Policy 28 has not been used in any planning decisions since adoption of the Plan.

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What parts of the evidence base need updating in line with recent contextual changes:

**4.4.19** It is considered unlikely that the evidence base will have changed significantly, and National Parks are still considered to be inappropriate locations for sub-regional waste management facilities.

**4.4.20** Policy 27 will require review to reflect the aims of minimising waste and working towards a circular economy.

## **4.5 Priority C: Climate Change, Sustainable Design, Flooding, Sustainable Energy**

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### **Policy 29 Sustainable Design**

#### **Review of Topic Area:**

**4.5.1** Policy 29 (Sustainable Design) sets out the strategic priorities for development proposals, requiring all forms of new development to make a positive contribution to the local character and distinctiveness of the built and natural environment within the National Park. This is a cross-cutting policy with many themes such as, biodiversity, community cohesion and health, accessibility, energy use and generation, waste,

and resilience to climate change overlapping with one another, collectively contributing to the National Park's vision of sustainable development.

**4.5.2** The policy is supported by Supplementary Planning Guidance on Sustainable Design and Development which aims to ensure that the design of developments in the National Park includes high quality buildings and spaces, based on the principles of intelligent siting, climate-responsive structures, and using sustainably sourced materials.

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What needs changing (issues/no issues) and how is the AMR performing in these areas:

**4.5.3** Over the three AMR monitoring periods there have been no planning permissions relating to the criteria listed under Sustainable Design being granted contrary to the plan. As such, Policy 29 is functioning effectively.

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What parts of the evidence base need updating in line with contextual changes:

**4.5.4** Policy 29 will need to be reviewed, particularly in respect to how new developments should follow The Energy Hierarchy for Planning as set out in PPW12, which seeks to reduce energy demand by increasing energy efficiency, through the location and design of new development. The Plan's policies on sustainable design should also support The Welsh Government's strategy to secure zero carbon buildings while continuing to promote design which supports decarbonisation and adapts to the current and future effects of climate change.

**4.5.5** PPW underscores the essential role of green infrastructure in shaping communities and enhancing wellbeing, offering a variety of functions and benefits that support social, economic, and environmental resilience. Policy 29 will need to be revised to consider how new development can incorporate the multi-functional benefits of green infrastructure across the current policy themes and how design relates green infrastructure to surrounding ecosystems and biodiversity.

**4.5.6** Policy 29 will also require revision to encourage measures that avoid poor lighting design from large internally lit areas from new development, in-line with the amendments to Policy 9 (Light Pollution).

**4.5.7** The Authority will be preparing separate Supplementary Planning Guidance (SPG) on both replacement dwellings and conversions of appropriate dwellings. The creation of these SPGs will likely require new criteria-based policies that will ensure that Policy 29 is reinforced and supported.



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## Policy 33 Renewable and Low Carbon Energy

### Review of Topic Area:

**4.5.8** Policy 33 provides support for small, medium and large scale renewable and low carbon energy proposals, which take into account the Special Qualities of the National Park. The policy is supported by Supplementary Planning Guidance which provides advice on different renewable energy methods and landscape sensitivity assessments for field scale solar photovoltaic development and wind turbines for each Landscape Character Area in the National Park. Additional Supplementary Planning Guidance on the Cumulative Impact of Wind Turbines also supports the policy.

**4.5.9** The policy was informed by the Renewable Energy Assessment (updated January 2016) which gives an overview of the contribution that the National Park can make to national renewable energy provision targets, without compromising National Park purposes.

**4.5.10** Future Wales sets ambitious targets for the generation of renewable energy in Wales and the policy framework for the determination of renewable energy development proposals. This includes Pre-Assessed areas for wind and Developments of National Significance. No Pre-Assessed areas are located within the National Park.

**4.5.11** PPW sets out the Energy Hierarchy for Planning with all new development expected to mitigate the causes of climate change in accordance with the hierarchy. Development Plan policies will need to support opportunities for heat networks, local renewable and low carbon energy generation schemes, and the co-location of new proposals and land allocations with existing developments, heat suppliers and heat users.

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### What needs changing (issues/no issues) and how the AMR is performing in these areas:

**4.5.12** Over the three AMR monitoring periods there have been no planning permissions relating to renewable energy proposals being granted contrary to the plan. Planning permissions have been granted to contribute towards both the renewable heat target and the renewable electricity target, although these have been small and do not take account of additional generation through Permitted Development Rights. Policy 33 is performing as intended.

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What parts of the evidence base need updating in line with recent contextual changes:

**4.5.13** There have been a number of national policy changes as well as a change in the consenting regime with proposals between 10MW and 350MW determined by Welsh Ministers.

**4.5.14** In March 2022, Welsh Government clarified that where Best and Most Versatile (BMV) agricultural land is identified within a proposed solar PV array development, considerable weight should be given to protecting such land from development.

**4.5.15** Policy 33 will need to be reviewed in line with these changes, including the targets for local ownership. The Renewable Energy Assessment also requires updating given advances in renewable energy technology, identifying opportunities for renewable and low carbon energy in the National Park, location of BMV Agricultural Land and potential updates to the landscape sensitivities in the SPG.

**4.5.16** A review of Policy 29 (Sustainable Design) will also be required to consider the energy hierarchy in planning when considering new developments.

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## **Policy 34 Flooding and Coastal Inundation**

### **Policy 35 Development in the Coastal Change Management Area**

### **Policy 36 Relocation of Existing Permanent Dwellings Affected by Coastal Change**

### **Policy 37 Relocation and Replacement of Development (other than Residential) Affected by Coastal Change**

#### **Review of Topic Area:**

**4.5.17** The policy framework relating to flooding and climate change includes Policy 34 (Flooding and Coastal Inundation) which is the overarching strategic policy, aimed at directing development away from those areas which are at risk from flooding. It is reinforced by Policies 35 (Development in the Coastal Change Management Area), Policy 36 (Relocation of existing permanent dwellings affected by coastal change), and Policy 37 (Relocation and replacement of development (other than residential) affected by coastal change). These supportive policies 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.

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What needs changing (issues/no issues) and how is the AMR performing in these areas:

**4.5.18** Flood risk is a key concern for many parts of the National Park and development that adds to the amount of infrastructure at risk from fluvial/coastal flooding should be avoided. Monitoring for the flood risk policies shows that three permissions have been granted in flood zone C2 since the Plan's adoption. These planning applications were granted by the Planning Committee, contrary to officer recommendation.

**4.5.19** Of these developments one was classed as 'highly vulnerable' as defined by TAN 15 and both others related to commercial premises within existing C2 flood risk areas. In both cases relating to commercial development, 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 were also contrary to Policy 35, which is to reduce risk to life and property over time in flood risk areas. However, the most recent monitoring period 2023-2024 shows that no applications were permitted in a C2 flood zone or within zone 3 of the Flood Map for Planning.

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What parts of the evidence base need updating in line with contextual changes:

**4.5.20** In September 2021, the Welsh Government released an updated TAN 15 on flooding and coastal erosion, set to take effect in December 2021. This document outlines flood zones for risks from rivers, the sea, and surface water, with a stronger emphasis on climate change and measures to avoid, restrict, or mitigate associated issues. The updates to TAN 15 include a greater focus on development plans and guidance on preparing effective Strategic Flood Consequences Assessments (SFCA). In addition, the Development Advice Maps will be replaced with new Flood Maps for Planning (FMfP), developed, and published by Natural Resources Wales.

**4.5.21** In November 2021, the Minister for Climate Change, postponed the revised TAN 15 implementation to June 1st, 2023, to allow Local Planning Authorities to fully consider its impact. Until then, the existing TAN and Development Advice Map remain in use. However, the FMfP is considered to represent the best available information we have on flood risk and NRW have advised that the FMfP may be regarded as a material consideration when determining planning applications. In instances where discrepancies arise between the flood zone classifications on the FMfP and the Development Advice Map the Authority will require the submission of a Flood Consequences Assessment (FCA) to support the application. The Minister also required each local planning authority to review their SFCA within the next 12 months, either individually or regionally.

**4.5.22** The Minister also required each local planning authority to review their SFCA within the next 12 months, either individually or regionally. ~~The~~ Stage 1 SFCA for SW Wales, completed in December 2022, details past flood events in the National Park. The study concluded that many authorities in south-west Wales need to advance to stage 2 or 3 SFCA to support Local Development Plans, identifying and managing flood risks for candidate sites. Progression beyond Stage 1 for the National Park area was not considered necessary as LDP2 had already been adopted and none of the sites allocated for development in LDP2 are in flood risk areas. No further update regarding TAN 15 has been issued by Welsh Government.

**4.5.23** The new TAN 15 and Flood Map for Planning is likely to come into force by the end of 2024 which will provide a significantly different context for planning decisions compared to the existing framework. Given this, the LDP's policies relating to flooding will need to be reconsidered to reflect the new TAN 15 and Flood Map for Planning, and the reviewed SFCA will inform the LDP's strategy and proposals, such as when assessing future candidate sites.

**4.5.24** Additionally, there is now national planning policy guidance included in the updated version of PPW relating to the relevance of Shoreline Management Plan's (SMP) to Local Development Plans. While the flooding and coastal inundation policies within the Plan promotes sustainable defence of the coast and are in line with area specific SMP policy, the SMP's policy units relevant to the Park have been revised with new updates to scenario areas. Therefore, it will be important to identify the stretches of coastline that the Authority is unable to defend and that may be vulnerable to coastal change. The policy will need to complement and remain consistent with the SMP policies in accordance with the framework established in PPW. As we transition into Epoch 2 (medium-term), collaborative engagement with both the Swansea and Carmarthen Bay Coastal Engineering Group and the West of Wales Coastal Group will remain a priority. ~~The policy will need to put more focus on promoting the inclusion of the SMP's policies in order to help manage residual risks from coastal erosion and flooding to inform future planning decisions.~~

## 4.6 Priority D: Visitor Economy, Employment

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### Policy 38 Visitor Economy (Strategy Policy)

### Policy 39 Loss of Hotels and Guest Houses

### Policy 40 Self-Catering Development

### Policy 41 Caravan, Camping and Chalet Development

### Policy 42 Site Facilities on Camping, Chalet and Caravan Sites

## Review of topic area:

**4.6.1** Policies 38 to 42 seek to attract visitors all year round while ensuring that the National Park environment continues to hold its attraction as a landscape of national and international importance. The strategy is to offer a range of holiday accommodation to meet the varying needs of visitors and to ensure that visitor and recreation activity does not damage the special qualities of the National Park. Provision is made for self-catering development through Policy 40 and for Camping, Caravanning and Chalet development, and site facilities through Policies 41 and 42. Policy 41 is supported by Supplementary Planning Guidance on Landscape sensitivity to Caravan, Camping and Chalet Development with siting guidance and mitigation measures where appropriate, generally small sites away from the coast and Preseli Hills.

**4.6.2** In October 2022, Welsh Government issued changes to planning regulations to introduce three new planning classes – a primary home (C3), a second home (C5 and short-term let accommodation (C6). Local planning authorities, where they have evidence, are able to make amendments to the planning system to require planning permission for a change of use from one class to another as well as giving the ability to control the number of second homes and holiday lets in any community. The National Park Authority undertakes analysis on the prevalence of second homes and holiday lets and prevalence of similar and recent developments in an area to determine if a C3 occupancy condition is applied to a permission, in addition to consideration to the application of Policy 40 (Self-Catering Development), Policy 46 (Housing), Policy 47 (Housing Allocations or Land with Planning Permission) and Policy 48 (Affordable Housing).

**4.6.3** Increases in the Council Tax premium for second homes (100 per cent in 2023-24, 200 per cent in 2024-25 and a decrease to 150 per cent agreed for 2025) as decided by Pembrokeshire County Council may well have further impacts on the numbers of second homes within the National Park and will require monitoring.

**4.6.4** The number of campsites in the National Park is significant, with many of the sites being Certificated sites from Exempted Organisations and 28-day sites and operating beyond their permitted development period. Monitoring of these sites continues to challenge the limited resources of the Authority. As a result, a public consultation was held between May and September 2024 on the proposal to remove permitted development rights for 28-day camping and caravan sites and the introduction of a voluntary Code of Conduct for Exempted Organisations. It is intended that an Article 4 Direction to remove permitted development rights for 28-day sites will be introduced in 2026.

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What needs changing (issues/no issues) and how the AMR is performing in these areas:

**4.6.5** Over the three AMR monitoring periods there have been no planning permissions relating to recreational activity, loss of hotels or self-catering development being granted contrary to the plan. Approval was given to one camping, caravanning and chalet development proposal in AMR monitoring period 1 contrary of officer recommendation, but the trigger was not reached.

**4.6.6** Changes in legislation regarding second home and holiday lets and the ability to address the impacts of these on the availability of housing in a community will require revisions to policies 38 and 40, as well as revisions to policies 46, 47 and 48 to address the new use classes.

**4.6.7** Revisions to Policy 41 will also be required in the light of the Article 4 Direction to remove permitted development rights for 28-day camping and caravan sites.

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What parts of the evidence base need updating in line with recent contextual changes:

**4.6.8** Up to date evidence and data relating to prevalence of second homes and short-term holiday lets will be required to inform decisions on whether greater planning controls are required across the National Park on second homes and holiday lets.

**4.6.9** Caravan, Camping and Chalet Development Land Sensitivity Assessment will require updates relating to existing development and landscape sensitivity to future development.

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## **Policy 43 Employment Sites and Live/Work Units**

### **Policy 44 (Protection of Employment Sites and Buildings)**

### **Policy 45 (Farm Diversification)**

#### **Review of Topic Area:**

**4.6.10** In terms of employment, the Plan makes no specific allocation for the provision of new land for class B1, B2 or B8 use but provides a framework which seeks to manage existing employment uses and allows for the provision of new small-scale provision. Policy 43 (Employment Sites and Live/Work Units) is a strategic policy that outlines the employment priorities of the National Park. It

supports small-scale developments within the Park to enhance the socio-economic wellbeing of its communities and address seasonal employment challenges.

**4.6.11** Policy 44 (Protection of Employment Sites and Buildings) similarly prevents the inappropriate loss of existing employment sites and buildings to other uses. Policy 45 (Farm Diversification), a criteria-based policy, allows for many economic activities to be sustainably located on farms provided that schemes are small scale and integrate well with surrounding countryside.

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What needs changing (issues/no issues) and how is the AMR performing in these areas:

**4.6.12** There are no key employment sites identified in the National Park and the Park does not have large derelict brownfield sites to list as employment protection sites. The location of the Park in relation to Pembrokeshire County Council, which has already identified several employment sites within their own LDP, means that there is sufficient provision for such employment uses beyond the boundaries of the National Park. South Hook LNG, near Herbrandston, is the only cross boundary employment site due to its proximity to the Haven Waterway.

**4.6.13** The Authority's AMR indicates that no permissions relating to employment are being granted contrary to the plan. As such, the above policies are functioning effectively and no changes are considered necessary at present.

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What parts of the evidence base need updating in line with contextual changes:

**4.6.14** PPW 12 states that development plans should identify employment land requirements, allocate an appropriate mix of sites to meet need and provide a framework for the protection of existing employment sites of strategic and local importance. It was considered at examination that the adopted Plan did not need to be supported by an Employment Land Review (ELR) and does not identify employment land requirements or allocate sites for development, as this would be provided in Pembrokeshire County Council's planning area.

**4.6.15** The COVID-19 pandemic has led to a significant increase in the number of people working from home. Even after all restrictions were lifted, working from a distance and for longer periods of time from the workplace continues to be a popular trend, especially in office-based sectors. Therefore, Policy 43 may need to be revised to address the long-term implications of remote work and ensure that the supply of employment land remains adequate and corresponds with future needs.

**4.6.16** The largest employers attracting people from outside the immediate areas are mainly around the Haven Waterway, outside the National Park. As a result of the

success of the Celtic Freeport bid, significant numbers of new jobs will be created along the fringes of the National Park, in turn attracting large investment to support low and zero carbon transformations along the Haven Waterway and in the Celtic Sea by 2050. While it's unclear if new major industrial sites will be identified along the Daugleddau Estuary, initial signs suggest existing sites adjacent to the National Park will be used, though new or expanded sites remain possible which may permeate into the Park area.

**4.6.17** Policy 32 of Future Wales – the National Plan 2040 recognises the Haven Waterway as a Regional Growth Area, an important location for development, innovation and investment. Widening scope of Policy 43 to include consideration for the Celtic freeport will be necessary in the revised Plan, as the Authority will need to work closely with Pembrokeshire County Council, playing a supportive role in facilitating new growth around the Haven.

## 4.7 Priority E: Affordable Housing and Housing

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### Policy 46 Housing (Strategy Policy)

### Policy 47 Housing Allocations or Land with Planning Permission

#### Review of Topic Area:

**4.7.1** The level of growth identified in LDP 2 is set out in Policy 46 Housing (Strategy Policy) which makes provision for 1,120 housing units to deliver a requirement of 960 dwellings over the 16-year plan period, 2015 to 2031. This equates to a target of 60 homes per annum. Policy 47 identifies the housing allocations and land with planning permission which are key to delivery of the housing strategy.

**4.7.2** The Welsh Government's household projections suggested there was little justification to make a housing provision in LDP 2. However, taking into account the wider issues and objectives of the Park, the housing provision provides for the retention of a more youthful population profile. The provision of market housing also enables the delivery of affordable housing to meet a significant need identified in the National Park.

**4.7.3** Since adoption of LDP 2, Future Wales has been published which sets out 'Where Wales will grow' (Policy 1). The Pembrokeshire Coast National Park is situated in the South West region, with the local planning authorities of Neath Port Talbot, Swansea, Carmarthenshire, Pembrokeshire and part of Bannau Brycheiniog (Brecon Beacons National Park). A national growth area for the South West region is identified in Future Wales as Swansea Bay and Llanelli and regional growth areas are identified as Carmarthen and the Pembrokeshire Haven Towns which includes



Haverfordwest, Milford Haven, Pembroke and Pembroke Dock. Future Wales states that “development in towns and villages in rural areas will support local aspirations and need complementing rather than competing with efforts to grow our towns and cities”. Future Wales Policy 4 ‘supporting Rural Communities’ and Policy 5 ‘Supporting the Rural Economy’ sets out how LDPs must plan positive to meet the needs of their communities.

What needs changing (issues/no issues) and how the AMR is performing in these areas:

**4.7.4** Housing delivery is in line with Policy 46 and housing allocations in Policy 47 are being delivered. Table one below is from the Annual Monitoring Report 2024 which shows the delivery of housing from the base date of 2015. The table shows the overall cumulative delivery of housing is on target as of April 2024, with 578 housing completions recorded since 2015, which is above the cumulative target of 531 completions.

**Table 3: Delivery of Housing from 2015 (Annual Monitoring Report 2024)**

	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	●
Year 9	2023-2024	62	531	478	398	52	578	84%	109%	Continue Monitoring	●

**4.7.5** Table 4 below shows the delivery of allocated housing sites as identified in Policy 47. The table shows the completion of nine sites, with a further nine progressing through the discussion, planning and construction phases. Two sites have not progressed to date and the review will consider whether there is sufficient certainty of delivery and viability on these sites. However, the delivery on these two sites is not considered to impact on the strategy of the plan, as the site capacity for both sites totals 17 units.

**Table 4: Delivery of Allocated Housing Sites identified in Policy 47**

<b>LDP Reference Number</b>	<b>Site Name</b>	<b>Site Capacity</b>	<b>Summary of planning status / build status</b>
HC1	Land at Feidr Eglwys, Newport	35	Completed
HC2	Newport Pottery and Deport, Newport	12	Completed
HA1	Land north of the Business Park, Newport	15	Pre-application discussions
HA2	Land at Sandy Hill, Saundersfoot	72	Planning permission granted July 2024
HA3	North of Whitlow, Saundersfoot	54	Under Construction
HA4	Penny Farm, Saundersfoot	36	Planning application received
HC3	West of Glasfryn Road, St porths	70	Completed
HC4	Land off Walton Road, Broad Haven	18	Completed
HA5	North, east and south of Marine Road, Broad Haven	87	Pre-application discussions
HC5	Site of former Sir Benfro Hotel, Herbrandston	28	Completed
HA6	Opposite Bush Terrace, Jameston	38	Under construction
HC6	Green Grove, Jameston	9	Completed
HA7	West of The Green, Lydstep	10	Ongoing discussion with landowner
HC7	Field Opposite Manorbier VC School	23	Completed
HC8	Off Trevayne Road (Rear of Cross Park), New Hedges	41	Completed
HA8	Glasfryn Field, Square and Compass	7	No known activity at this stage to bring site forward

HA9	Land Adjacent to Bryngolau, Square and Compass	10	No known activity at this stage to bring site forward
HC9	Adjacent to the School, St Ishmaels	15	Planning permission granted July 2023
HA10	Land off Cefn Gallod, Trefin	11	Planning permission granted September 2022
HC10	Land at Whitchurch, Solva	5	Completed

**4.7.6** LDP 2 only provides a housing supply until the end of the plan period in 2031, beyond which a replacement plan is required to identify housing provision. The Planning and Compulsory Purchase Act (PCPA) 2004 was amended through the Planning (Wales) Act 2015 and introduced a provision specifying the period to which a plan has effect and an end date to the plan. The adopted LDP 2 will therefore cease to be the development plan for the National Park on 31 December 2031. It is fundamental that a replacement LDP is in place prior to the end date in 2031 to ensure there is a framework for decision making and to provide housing and affordable housing for local communities.

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**What parts of the evidence base need updating in line with recent contextual changes:**

**4.7.7** To ensure there is a deliverable and viable supply of housing including affordable housing in the National Park, Policy 46 would be reviewed to ensure there is housing requirement, taking account of the following evidence:

- the latest Welsh Government Household Projections – the 2021 based Household Projections are due to be published by Welsh Government in 2025
- Pembrokeshire’s Wellbeing Plan (2023)
- the latest Local Housing Market Assessment – the LHMA (2023) for Pembrokeshire has been prepared and is awaiting sign off by Welsh Government.

**4.7.8** Wider economic, social and environmental and cultural factors, unique to the National Park will also be taken into account when considering an appropriate growth level. The plan will consider the link between housing and economic growth, including the potential impact of Freeport in Pembrokeshire, affordable housing need, de-population in the National Park, an ageing population, high numbers of second homes and short term lets and the impact on the Welsh language. The Authority will consider the landscape capacity of the National Park to accommodate further growth and undertake an urban capacity study to evaluate the potential for

new development within towns and villages without expanded beyond the existing settlement boundary.

**4.7.9** Policy 47 requires a full review and revision to identify land for future housing development in accordance with the spatial and growth strategy. A full revision to the LDP would provide the opportunity to undertake a call for candidate sites to identify and assess potential new sites for development against a range of environmental, social and economic criteria and against the Sustainability Appraisal framework. Housing delivery options for small self-build sites will also need to be considered as required by PPW 12. All development sites must demonstrate they are deliverable and viable.

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## **Policy 48 Affordable Housing (Strategic Policy)**

### **Policy 49 Affordable Housing Exception Sites**

#### **Review of topic area:**

**4.7.10** The delivery of affordable housing is a Welsh Government priority. Future Wales, Policy 7 ‘Delivering Affordable Homes’ requires local planning authorities to develop strong evidence-based policy frameworks to deliver affordable housing. LDPs are required to “identify sites for affordable housing led developments and explore all opportunities to increase the supply of affordable housing.”










**4.7.11** The Development Plans Manual and PPW has been updated since preparation of LDP 2 and advocates that viability information is front loaded, with landowners and developers carrying out an initial site viability assessment at the candidate site stage (PPW, paragraph 4.2.20).

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#### **What needs changing (issues/no issues) and how the AMR is performing in these areas:**

**4.7.12** Policy 48 ‘Affordable Housing (Strategy Policy)’ sets out a target to delivery 362 affordable dwellings over the 16-year plan period. Since the base date of the plan in 2015, 210 affordable homes have been completed, which is marginally above the cumulative target of 207 affordable homes. The delivery of affordable housing is likely to exceed the target set in LDP 2 as a development at Brynhir, Tenby has recently gained planning permission for 125 homes, of which 93 will be affordable, which equates to 75 per cent of the development.

**Table 5: Overall cumulative performance is on target as at April 2024**

	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	
Year 9	2023-2024	23	207	186	155	27	210	101%	Continue Monitoring	

**4.7.13** AMR indicator 25 monitors policies 47 and 48 to ensure affordable housing targets for delivery of affordable housing for each local market housing area are maintained. The trigger for a 10 per cent change in house prices, build costs or affordable rents has not been exceeded in any monitoring period and there has not been a need to review the viability evidence.

**4.7.14** The replacement Plan will consider ways to maximise the delivery of affordable housing to meet the identified need in the latest Local Housing Market Assessment. The Authority will work with Pembrokeshire County Council as the Housing Authority to explore the suitability of land in public ownership where affordable housing delivery can be maximised. The Authority will also work with Registered Social Landlords to maximise the delivery of affordable housing led sites and homes for local need in line with the spatial strategy. The plan will review evidence in the latest LHMA and develop robust policies to ensure the plan delivers affordable housing in accordance with the spatial need, the size of property required and tenure. The plan will also need to consider evidence from the LHMA with regard to specific housing requirements for older people and people with disabilities.

**4.7.15** LDP Policy 49 ‘Affordable Housing Exception Sites’ provides a criteria based framework to permit the development of affordable housing on sites outside of, but adjacent to settlement boundaries. Since 2015, 31 affordable housing units have been permitted on exception sites in the National Park, with 17 of these completed and occupied. There is a need to revise the policy to clarify that only social rented or intermediate rented tenures will be permitted on exception sites.

What parts of the evidence base need updating in line with recent contextual changes:

**4.7.16** Policy 48 ‘Affordable Housing (Strategy Policy)’ sets out the thresholds and targets for affordable housing delivery in spatial areas of the National Park. This policy is based on evidence from an affordable housing viability study undertaken to

inform LDP 2. The high-level viability assessment will be revised to ensure it takes account of up-to-date information on all viability components, including land costs, build costs, house prices, Section 106 requirements and any specific LDP requirements, such as controls on use classes and build standards. The authority will explore the impact on viability of any controls over the occupancy of housing and restrictions to primary dwellinghouses, space or lifetime homes standards and net zero requirements for market housing. Site specific viability information will be required from site proponents for all sites that are key to deliver the Plan's strategy, as identified by the authority.

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## Policy 50 Housing Development Proposals

### Policy 51 Housing Densities

### Policy 52 Housing Mix

#### Review of Topic Area:

**4.7.17** Policy 50 Housing Development Proposals sets out the type and scale of housing development that is acceptable within the settlement hierarchy. Policy 51 'Housing Densities' sets a minimum density of 30 dwellings per hectare. Policy 52 'Housing Mix' requires a mix of dwelling sizes, types and tenures to create balanced communities.

**4.7.18** In response to the climate and nature emergencies, Monmouthshire and the Vale of Glamorgan councils are proposing policies in their emerging replacement LDPs for 'net zero carbon homes'. Planning Policy Wales states the Welsh Government's policy is to secure zero carbon buildings and that planning authorities should assess strategic sites to identify opportunities to require higher sustainable building standards, including zero carbon. Any proposed standards which are higher than the national minimum need to be based on robust evidence and take account of the economic viability of the scheme (see PPW, paragraph 5.8.5).

**4.7.19** Since October 2021, publicly funded affordable housing in Wales is required to be built to Welsh Development Quality Requirements 2021 'Creating Beautiful Homes and places which sets out the minimum quality standards for new affordable homes. The standards sets minimum space standards and energy standards to achieve Energy Performance Certificate A (EPC A) requires a non-fossil fuel requirement for domestic heating and water systems. New affordable homes delivered through planning obligations is required to meet the space standards.

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What needs changing (issues/no issues) and how the AMR is performing in these areas:

**4.7.20** Policies 50, 51 and 52 will be reviewed to ensure they continue to be appropriate and in accordance with the LHMA and other evidence.

**4.7.21** Policy 51 Housing Densities is monitored through the AMR and a trigger for two or more housing development not achieving 30 dwellings to the hectare unless an alternative density is justified under Policy 51. The trigger has not been met which suggests the density is appropriate and in line with development that is being delivered.

**4.7.22** Policy 52 Housing mix is monitored with a trigger of two or more housing developments approved contrary to Policy 52. The trigger has not been met which suggests the policy is being delivered.

**4.7.23** The National Park Authority receives a number of applications for replacement dwellings and officers have identified a need for a new criteria-based policy to assess proposals for replacement dwellings.

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What parts of the evidence base need updating in line with recent contextual changes:

**4.7.24** The review process will gather evidence and consider the viability implications of requiring net zero carbon homes and space standards in market housing the National Park. Any housing policies which have an impact on the viability of housing delivery would need to be assessed as part of the viability assessment to ensure the impact on affordable housing delivery is appropriately assessed and that development remains viable and deliverable.

**4.7.25** The plan will need to consider evidence from the LHMA with regard to specific housing requirements for older people and people with disabilities. A mandatory provision for housing developments to construct a proportion of dwellings in accordance with Lifetime Homes Standards will also need to be carefully evaluated. This will necessitate a thorough assessment of the viability implications associated with implementing such standards.

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## Second Homes and Short-term lets

### Review of Topic Area:

**4.7.26** In October 2022, the Town and Country Planning (Use Classes) (Amendment) (Wales) Order 2022 split use class C3 dwelling houses as follows:

- Class C3 – Dwelling houses, used as a sole residence or main residence and occupied for more than 183 days in a calendar year
- Class C5 – Dwellinghouse, used otherwise than as sole of main residence and occupied for 183 days or fewer
- Class C6 Short-term lets for not longer than 31 days in each period of occupation.

**4.7.27** Planning Policy Wales was also updated to make it explicit that, where relevant, the prevalence of second homes and short-term lets in a local area must be taken into account when considering housing requirements and policy approaches in Local Development Plans (LDPs). Planning Policy Wales (paragraph 4.2.10 reads)

“Where robust local evidence has identified impacts on the community arising from the prevalence of second homes and short-term lets, planning authorities may consider co-ordinated local planning approaches. This may include specifically identifying sites in development plans for new homes which are limited in use to sole or main residences or local market housing and/or the introduction of area specific Article 4 direction which may require a planning application for a change of use of a sole or main residence to a second home or short-term let.” (paragraph 4.2.10).

**4.7.28** Gwynedd is the first authority in Wales to introduce an Article 4 Direction, and from 2 September 2024, planning permission is required to change the use of a property to a second home, short-term let or a specific mixed use. Eryri National Park have also consulted on the introduction of an Article 4 Direction to control second homes and short term lets which may be implemented from 1 June 2025. It will be important to learn from the experience of these authorities and the social and economic impacts of the Article 4 Direction.

**4.7.29** The Authority has a data sharing agreement with Pembrokeshire County Council to obtain council tax data on the number of second homes and short term lets. This data provides the Authority with the spatial detail of communities with a high level of second and short term lets. It will be a key piece of evidence when considering suitable policies options to for second homes and short term lets.



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What needs changing (issues/no issues) and how the AMR is performing in these areas:

**4.7.30** To accord with Planning Policy Wales, there is a need to gather robust evidence on the impact of second homes and short term lets and whether there is a need to develop a local policy approach to restrict residential uses.

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What parts of the evidence base need updating in line with recent contextual changes:

**4.7.31** Evidence will be gathered on the number and spatial distribution of second homes and short-term lets in the National Park. Evidence will be gathered to understand the social, economic and environmental impacts of second homes and short-term lets and whether local policies are required to control their number.

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## Policy 53 Gypsy and Travellers

Review of Topic Area:

**4.7.32** Policy 53 'Gypsy, Traveller and Showpeople Sites' is a criteria-based policy to assess proposals for new Gypsy, Traveller and Showpeople sites. There are no allocated sites for Gypsy and Travellers in LDP 2.

**4.7.33** The latest evidence in the Gypsy and Traveller Accommodation Assessment (GTAA) (2019) was approved by Welsh Government in May 2024. The GTAA sets out a need for nine residential pitches over the five year period 2019 to the end of 2024, with a net additional need from 2025 to 2033 of 30 pitches. The majority of existing sites for Gypsies and Travellers are located outside of the National Park, with only one private site with planning permission in the National Park at Teagues Cross, near Carew. The general locations identified by people in need are generally within the south of the county with Haverfordwest providing the furthest location to the north.

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What needs changing (issues/no issues) and how the AMR is performing in these areas:

**4.7.34** Since the base date of the plan in 2015, no planning applications for new Gypsy and Traveller sites have been received in the National Park. The Authority will work with Pembrokeshire County Council as the Housing Authority to ensure the need for Gypsy and Traveller sites is addressed.

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What parts of the evidence base need updating in line with recent contextual changes:

**4.7.35** The GTAA was prepared in 2019 and a new GTAA is required every five years. A new GTAA for Pembrokeshire will be undertaken following the publication of new guidance awaited from Welsh Government. The Authority will work with Pembrokeshire County Council as the Housing Authority to ensure that the need for Gypsy and Traveller sites in Pembrokeshire is met.

## 4.8 Priority F: Community Facilities, Retailing, Transport

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### Policy 54 Community facilities

#### Review of Topic Area:

**4.8.1** Policy 54 of the LDP Protects against unnecessary loss of community facilities ensuring existing facilities are safeguarded and provision enhanced. The policy aims to encourage the retention and provision of a network of community facilities which reflect the needs of both National Park residents and visitors. For the purposes of this policy, community facilities can include convenience shops, public houses, cinemas, petrol filling stations, children's formal play areas, playing fields, doctors' surgeries, schools, village/community halls, nursing homes, churches, and allotments.

**4.8.2** Planning Policy Wales (Edition 12, February 2024) emphasises the importance of community facilities by creating sustainable and vibrant communities. It highlights that community facilities, such as schools, health services, libraries, and leisure centres, are essential for the wellbeing and social cohesion of communities.

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What needs changing (issues/no issues) and how is the AMR performing in these areas:

**4.8.3** Review of the last three AMR monitoring periods shows that the policy is performing well and indicates that no critical community facilities have been lost and that no planning permissions for their loss have been granted contrary to the Plan. As such, it is considered that the requirements of Policy 54 are being sufficiently met.

**4.8.4** 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. There is no clear indication that there has been a deterioration in general in the range of facilities in Centres, therefore its important monitoring is continued. However, a decline in the number of local shops is identified within the

AMR with the possibility that the reasons behind it are associated with the cost-of-living crisis more generally.

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What parts of the evidence base need updating in line with contextual changes:

**4.8.5** While it is considered unlikely that the evidence base will have changed significantly, review of existing community facilities within the National Park's Local and Rural Centres will need to be carried out during plan revision. Updating the current evidence base will ensure that community facilities continue to address the requirements of residents within the National Park's Centres and Rural Centres. Recorded losses or increases in community facilities will inform the new plan to whether any new rural centres should be added or taken out of the revised plan.

**4.8.6** Additionally, consideration will also be given in the replacement LDP to providing a comprehensive, up-to-date list of what community services should be defined as. Many examples of what constitutes as a community facility, such as a phone-box, no longer accurately represent the needs of the Park's Centres.

**4.8.7** Widening the scope of Policy 54 to reflect the principles of placemaking in PPW, which includes the provision of community infrastructure, will also need to be considered.

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## Policy 55 Infrastructure

Review of Topic Area:

**4.8.8** Policy 55 'Infrastructure Requirements' sets out the requirements for planning obligations to ensure new development is supported by suitable arrangements for the improvement or provision of infrastructure, services and community facilities. Contributions are secured through Section 106 of the Town and Country Planning Act 1990. Policy 55 provides a hierarchy of infrastructure and facilities to be provided, with affordable housing given priority. The policy is supported by Supplementary Planning Guidance on Planning Obligations.

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What needs changing (issues/no issues) and how the AMR is performing in these areas:

**4.8.9** AMR indicator 32 monitors Section 106 agreements secured in line with guidance. Review of the last three AMR monitoring periods shows Policy 55 is

performing well and no planning applications have been approved contrary to recommendation.

**4.8.10** A review of existing and required infrastructure will be undertaken during plan revision to ensure new development is supported. The Authority will work with site promoters and developers, Pembrokeshire County Council and utility providers to ensure the new development is supported by necessary infrastructure.

**4.8.11** The list of infrastructure priorities will need to be reviewed to take account of the latest need for affordable housing and also the need for digital infrastructure, including broadband connectivity and electric vehicle charging infrastructure. Green Infrastructure is also a requirement to support all developments.

**4.8.12** Supplementary Planning Guidance on Planning Obligations will need to be updated to ensure that contributions take account of inflationary cost increases.

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What parts of the evidence base need updating in line with recent contextual changes:

**4.8.13** The Authority will need to collate up to date information on the financial cost of delivering section 106 requirements, which includes recreational and amenity open space, transport facilities, education, community facilities, public art and biodiversity. The S106 costs will inform the affordable housing viability assessment to inform what level of affordable housing could be delivered.

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## **Policy 56 (Strategic Policy) Retail in the National Park**

### **Policy 57 Town and District Shopping Centres**

### **Policy 58 Garden Centres**

#### **Review of Topic Area:**

**4.8.14** Policies 56 and 57 provide the policy framework for ensuring that the retail centres of the National Park retain their vitality, viability and diversity of shopping choices. The town shopping centre of Tenby, the district shopping centres of Saundersfoot, Newport and St Davids and the smaller National Park shopping centres follow the spatial hierarchy of the Plan.

**4.8.15** Policy 56 sets out the provision for new comparison floorspace while Policy 57 sets out the acceptable use classes and locations for retail, including the consideration of the cumulative impacts of non-A1 uses.

**4.8.16** Policy 6 of Future Wales sets out the sequential approach that must be used to locate significant new commercial, retail, education, leisure and public service facilities in a 'Town Centres First' approach. It also sets out the approach needed to ensure that town centres are multi-functional places, including as places to live, centres of community and cultural activity, a focus for public services such as health and education, and the location of new co-working spaces.

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What needs changing (issues/no issues) and how the AMR is performing in these areas:

**4.8.17** Over the three AMR monitoring periods there have been no planning permissions relating to the retail hierarchy being granted contrary to the plan. Vacant retail floor space has not reached greater than 10 per cent for any 2 consecutive years in the National Park, showing that Policies 56 and 57 are performing as intended.

**4.8.18** Policy 58 (Garden Centres) has not been used in any planning decisions since the adoption of the Plan.

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What parts of the evidence base need updating in line with recent contextual changes:

**4.8.19** The Retail Centre Boundaries of the five National Park retail areas will need to be reviewed in order to ensure that they remain up to date. The Primary Retail Frontage in Tenby will also require review and a consideration given to the need to identify further Primary Retail Frontages in other locations and / or Secondary Retail Frontages. Particular consideration will be given to Saundersfoot following the completion of the Welsh Government funded Saundersfoot Harbour regeneration scheme.

**4.8.20** Review of acceptable use classes in retail areas will require review in line with Policy 6 (Town Centre First) of Future Wales to make town centres multi-functional places.

**4.8.21** Building on the above, it is recognised that Policy 58 may need to be reviewed in terms of the multifunctionality of garden centres, and how the range of goods which is typically sold from them has changed over time.

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## **Policy 59 Sustainable Transport**

### **Policy 60 Impacts of Traffic**

## Policy 61 Cycleways

### Review of Topic Area:

**4.8.22** Policy 59 ‘Sustainable Transport (Strategy Policy)’ sets out the strategic priorities for transport to improve accessibility and reduce the need to travel by private car. The spatial strategy directs development to locations which have a reasonable range of facilities and access by public transport. Policy 60 sets out criteria for assessing development and requires proposals to have suitable access and an acceptable impact on traffic and the locality. Policy 61 supports the development of cycleways and shared user paths.

**4.8.23** Since the adoption of LDP 2, the Welsh Government has published Llwybr Newydd: the Wales Transport Strategy 2021, which sets a new way of thinking that places, people and climate change are at the front and centre of the transport system. The transport system is key to ensuring net zero by 2050. The National Plan sets a vision for an ‘accessible, sustainable and efficient transport system’. It sets three priorities:

1. Bring services to people in order to reduce the need to travel
2. Allow people and goods to move easily from door to door by accessible, sustainable and efficient transport services and infrastructure
3. Encourage people to make the change to more sustainable transport

**4.8.24** These priorities will be embedded in the Regional Transport Plan which is being prepared by the South West Wales Corporate Joint Committee and the Local Transport Plan for Pembrokeshire.

**4.8.25** The Sustainable Transport Hierarchy for Planning is set out in transport hierarchy for Planning in Planning Policy Wales and Future Wales.

**4.8.26** At the top of the hierarchy, the Welsh Government seeks to increase active travel and Active Travel Network Maps show existing and future routes.

**4.8.27** The National Park recently commissioned a report into ‘Access and travel management for the Pembrokeshire Coast’, undertaken by Martin Higgitt Associates (2023). The report was commissioned to assess the scale and nature of traffic and parking pressure at coastal locations and develop recommendations for the future management of access and travel to coastal destinations. The report recommends partnership working to adopt a long-term sustainable strategy to improve public transport access to and around the Park, together with the improvement of active travel routes. The report recommends focusing on the tourism hot spots in the south-east and marketing as a sustainable tourism destination with itineraries and attractive ticketing options would encourage visitors to reduce their use of the car.

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What needs changing (issues/no issues) and how the AMR is performing in these areas:

**4.8.28** AMR indicator 39 monitors applications approved contrary to Policy 59 'Sustainable Transport (Strategy Policy). Review of the last three AMR monitoring periods shows Policy 59 is performing well and no planning applications have been approved contrary to recommendation.

**4.8.29** The replacement plan will need to develop an appropriate policy framework to assess and support the development of electric vehicle charging infrastructure and safeguard active travel routes.

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What parts of the evidence base need updating in line with recent contextual changes:

**4.8.30** Future Wales and national policy guidance will be translated into the LDP to inform the spatial strategy and location and design of new development.

**4.8.31** Transport policies will be reviewed to ensure accordance with Future Wales, PPW, Llwybr Newydd and the emerging Regional Transport Plan. The LDP will adhere to the transport hierarchy and promote active travel and the use of public transport. The principles of sustainable transport will also inform and shape the spatial strategy.

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## **Policy 62 Powerlines and Pipelines**

## **Policy 63 Telecommunications**

Review of Topic Area:

**4.8.32** The National Park experiences continued interest in the development of telecommunications facilities, represented by frequent proposals for expansion or upgrade of the mobile data network. Policy 62 (Powerlines and Pipelines) and Policy 63 (Telecommunications) each guide cable and telecommunication infrastructure to the least obtrusive location possible, ensuring such developments have given regard to the National Parks special qualities.

**4.8.33** Many telecommunication proposals lie outside the scope of normal planning control with the National Park Authority only being consulted by the relevant statutory body. In cases where the Authority cannot object to the principle of development, it can exercise control over the siting and appearance.

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What needs changing (issues/no issues) and how is the AMR performing in these areas:

**4.8.34** Since the adoption of the replacement plan, the Authority has seen increasing demand for telecommunications developments across the National Park. This in part is due to a campaign to improve the connectivity in rural areas within the UK which comes under the Shared Rural Network Scheme, launched in 2020. This scheme seeks to improve geographic network coverage to 74 per cent in National Parks up from 41 per cent. This has resulted in more applications being brought forward and submitted within the National Park.

**4.8.35** Policies 62 and 63 are criteria-based policies, therefore new telecommunication development is not currently monitored by the AMR's, making it difficult to measure the cumulative impact of these proposals.

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What parts of the evidence base need updating in line with contextual changes:

**4.8.36** TAN 19 (Telecommunications) was revoked in February 2024 to streamline and update the planning guidance for telecommunications. The guidance previously provided within TAN 19 is now covered by Future Wales, PPW 12, and the Code of Best Practice on Mobile Phone Network Development for Wales. These documents offer updated and integrated guidance to better address current and future telecommunications needs, emphasising sustainable development, balancing technological progress with environmental protection, and community wellbeing.

**4.8.37** As a result of these changes, wording to Policies 62 and 63 will be assessed and updated as appropriate to reflect any new evidence or changes in national policy with reference to the new placemaking principles in PPW. Since these policies require extensive revision due to substantial contextual changes, there would be opportunity to amend Policy 63 to ensure that future telecommunication developments are monitored, safeguarding against sporadic development across the National Park.



**5.1.1** The Development Plans Manual requires authorities to explore and explain the opportunities to prepare joint LDPs with neighbouring local planning authorities and increase cross-boundary working. It is noted that there are currently no joint LDPs being prepared in Wales.

**5.1.2** With regard to preparing a joint LDP, there is currently no opportunity to progress with a joint LDP as authorities are at different stages of LDP preparation as outlined below:

- Pembrokeshire County Council consulted on a Re-Deposit Local Development Plan 2 in October to December 2024, with adoption of the plan timetabled for May 2026.
- Carmarthenshire County Council is currently preparing its replacement Local Development Plan 2 and is at examination stage, with adoption of the plan anticipated in summer 2025.
- At full Council in October 2021, Ceredigion County Council agreed a temporary, yet unspecified length pause for the replacement LDP to gather evidence and mitigation options regarding phosphate levels in the River Teifi Special Area of Conservation.

**5.1.3** There are clear opportunities to undertake joint and collaborative working with other local planning authorities. The south west Wales Corporate Joint Committee has a statutory duty to prepare a Strategic Development Plan (SDP) for the region. The SDP will cover strategic land use planning issues on a regional scale and once an SDP is adopted, it would inform the scale and location of growth for LDPs/LDP Lites. At present, there is no Delivery Agreement and timescale for preparing an SDP, however, the LDP revision process will be informed by joint working across the region on strategic planning issues.

**5.1.4** Officers work closely with Pembrokeshire County Council (PCC) as the principal authority for housing, transport, education and waste in Pembrokeshire. As PCC is the Housing Authority, officers work closely with PCC when preparing the Local Housing Market Assessment and Gypsy and Traveller Accommodation Assessment and have commissioned joint evidence base documents, such as a joint Green Infrastructure Assessment. Officers will liaise with PCC when developing key evidence base documents, including the Affordable Housing Viability Assessment.

**5.1.5** There are a number of jointly adopted Supplementary Planning Guidance documents between PCC and the NPA, which includes:

- Cumulative Impact of Wind Turbines on Landscape and Visual Amenity
- Biodiversity

- Historic Environment (Archaeology)
- Planning Obligations
- Seascape Character

**5.1.6** On a regional basis, a Two County Economic Study for Carmarthenshire and Pembrokeshire was prepared in 2019, a Regional Retail Study in 2017 and Strategic Flood Consequences Assessment in 2022. Further regional work will take place with the emerging Strategic Development Plan for South West Wales. Officers will liaise with PCC when developing key evidence base documents, including the Affordable Housing Viability Assessment.

**5.1.7** It is considered most appropriate for the Pembrokeshire Coast National Park Authority to undertake a full revision of the LDP solely for the National Park area. Where possible, the Authority will work collaboratively with Pembrokeshire County Council, neighbouring authorities and those in the South West Wales region to make effective use of resources and ensure cross boundary issues are appropriately addressed.

### 6.1 What form of plan revision is required?

**6.1.1** The Review Report has considered the key contextual changes since LDP 2 was adopted in September 2020, alongside the latest AMR findings and undertaken a full review of the plan's vision, objectives, strategy, allocations and policies to assess how well the plan is performing. The report has detailed that LDP 2 is delivering well, however, there have been a number of key contextual changes and changes to national policy or legislation since plan adoption.

**6.1.2** A key outcome of the Review Report is to conclude on whether the LDP requires a short form or a full revision. The short form revision procedure is a selective revision of plan where limited and focussed changes are required. The short form revision excludes the requirement to undertake a preferred strategy consultation and makes it a quicker revision process, taking approximately two and a half years. Where there are any changes to the strategy of the plan in terms of spatial distribution or scale of growth a short form revision would not be appropriate. Due to the limited scope of the revision procedure this form of revision requires a robust justification and there is potential for legal challenge.

**6.1.3** A full revision procedure is a full replacement plan is being prepared with a new strategy proposed. The Development Plans Manual states a full revision should take approximately three and a half years. The full revision procedure offers scope and flexibility to address a range of issues.

**6.1.4** Based on the evidence contained in the Review Report, it is concluded that LDP 2 should follow the full revision procedure as the scale and nature of the proposed changes have potential to change the strategy of the plan. As the end date of LDP is the end of December 2031, it is fundamental that a replacement plan is adopted in advance to ensure a suitable strategy and local policy framework guides development in the National Park. A summary of the main proposed changes required are:

- Revise the LDP to ensure the LDP is in **general conformity with Future Wales** and the LDP reflects its national strategy and policies at a local scale.
- The **plan's strategy and settlement hierarchy** was informed by the Wales Spatial Plan which has been revoked. The plan will need to gather evidence of available services and facilities to inform a sustainable settlement hierarchy.
- Need to consider an **appropriate growth strategy**, informed by the Welsh Government's projections, evidence of affordable housing need in the LHMA,

Pembrokeshire's wellbeing plan, urban and landscape capacity and a range of socio-economic and environmental considerations.

- Undertake a **call for candidate sites** to ensure appropriate land for housing is identified post 2031.
- Explore opportunities to **maximise affordable housing** and identify affordable housing led sites.
- It is fundamental the plan's strategy **responds to the climate and nature emergencies**. The plan will consider the viability of requiring zero carbon market homes.
- Address changes in Planning Policy Wales with the consideration of **suitable local policies to control second homes and short term lets**.
- Address changes in Planning Policy Wales regarding the **identification and protection of strategic green infrastructure**, securing a net benefit for biodiversity, strengthen policies to protect Sites of Special Scientific Interest, opportunities to increase tree and woodland cover.
- Address the need to respond to guidance on Riverine SACs regarding **water quality**.
- Update evidence to take account of **Strategic Flood Consequences Assessment and Flood Map for Planning** which will inform the LDP's strategy and proposals.
- Collaborate with Pembrokeshire County Council and **play a supportive role in facilitating new growth around the Haven Waterway** as a result of the successful Celtic Freeport bid.
- **Update the Renewable Energy Assessment** to take account of advances in renewable energy technology and generation targets.
- Revise policies relating to camping and caravanning in the light of the intended **Article 4 Direction** to remove permitted development rights for 28-day sites.
- Revise and **update landscape sensitivity**.
- Update policies relating to Retail Centres to take account of the **Town Centres First** policy in Future Wales and review National Park Retail Centre boundaries.

### **Next steps:**

**6.1.5** Subject to agreement by the National Park Authority, a full replacement LDP will be prepared, to be known as LDP 3. Welsh Government guidance states that it expects plans being revised to be prepared in three and a half years from formal agreement of the Delivery Agreement. A Delivery Agreement setting out the timescale for preparation of LDP 3, together with the Community Involvement Scheme will be prepared and will be available for public consultation following agreement of the Review Report. Alongside Future Wales, the adopted LDP 2 would remain the adopted development plan for the National Park, until replaced by an adopted LDP 3.

## Appendix 1: Policy Review

Theme	Policy number	Policy name	Notes
National Park Purposes and Duty	1	National Park Purposes and Duty (Strategy Policy - overarching)	Policy is functioning effectively and no changes considered necessary at this time.
Spatial Strategy	2	Tenby Service and Tourism Centre (Tier 1) (Strategy Policy)	Policy is functioning effectively, but policy and settlement boundaries requires review as part of the review of the spatial strategy.
	3	Newport Local Centre (Tier 2) (Strategy Policy)	Policy is functioning effectively, but policy and settlement boundaries requires review as part of the review of the spatial strategy.
	4	Saundersfoot Local Centre (Tier 2) (Strategy Policy)	Policy is functioning effectively, but policy and settlement boundaries requires review as part of the review of the spatial strategy.
	5	St Davids Local Centre (Tier 2) (Strategy Policy)	Policy is functioning effectively, but policy and settlement boundaries requires review as part of the review of the spatial strategy.
	6	Rural Centres (Tier 3) (Strategy Policy)	Policy is functioning effectively, but policy and identified rural centres requires review, together with settlement boundaries as part of the review of the spatial strategy.
	7	Countryside (Tier 4 ) (Strategy Policy)	Policy is functioning effectively <del>and no identified change required, but will require review.</del>
Priority A. Special Qualities	8	Special Qualities (Strategy Policy)	Policy is functioning effectively, but minor amendments will be required with regard to new and updated Special Qualities identified in the draft Partnership Plan 2025-2029.
	9	Light Pollution	Policy is functioning effectively, but a revision is required to take account of increased importance of Dark Skies and their identification as a Special Quality.

			Revisions are required to take account of increased light pollution from internal sources.
	10	Sites and Species of European Importance	Policy is functioning effectively, but a revision is required to amend wording to change references from European sites to the National Site Network and changes to PPW regarding the protection for Sites of Special Scientific Interest.
	11	Nationally Protected Sites and Species	Policy is functioning effectively but will be reviewed and could be combined with policy 10.
	12	Local Areas of Nature Conservation or Sites of Geological Interest	Policy is functioning effectively, but will be reviewed and could be combined with policy 10.
	13	Welsh Language	Policy is performing as intended but will require review. Potential changes in other policy areas will be considered for impacts in the Welsh Language Impact Assessments.
	14	Conservation of the Pembrokeshire Coast National Park	Policy is performing as intended but will require review to ensure continued protection and enhancement of the Special Qualities, including the historic environment and landscape.
	15	Open Space	Policy is performing as intended but will require review to assess provision and shortfalls.
	16	Green Wedges	Policy is performing as intended but will require review.
	17	Shore Based Facilities	Policy functioning effectively and no changes considered necessary at present
	18	Porthgain, Saundersfoot, Solva and Tenby Harbours	Policy functioning effectively and no changes considered necessary at present
Priority B. Major Development, the Potential for Growth	19	Hazardous Installations	Policy functioning effectively and no changes considered necessary at present

	20	Scale of Growth (Strategy Policy)	Policy functioning effectively and no changes considered necessary at present
	21	Minerals Safeguarding	Policy is performing as intended but will require review.
	22	Buffer Zones	Policy is performing as intended but will require review.
	23	Borrow Pits	Policy is performing as intended but will require review.
	24	Local Building Stone	Policy is performing as intended but will require review.
	25	Recycled, Secondary and Waste Materials	Policy is performing as intended but will require review.
	26	Inactive Mineral Sites	Policy is performing as intended but will require review.
	27	Local Waste Management Facilities	Policy is performing as intended but will require review to reflect the aims of the Circular Economy.
	28	Composting	Policy has not been used in any planning applications and could be included as part of Policy 27.
Priority C. Climate Change, Sustainable Design, Flooding, Sustainable Energy	29	Sustainable Design (Strategy Policy)	Policy and supporting guidance are functioning effectively. Reconsider policy criteria in light of national planning policy/guidance, particularly in respect of The Energy Hierarchy for Planning and Green Infrastructure objectives.
	30	Amenity	Policy functioning effectively and no changes considered necessary at present.
	31	Minimising Waste	Policy is performing as intended but will require review.
	32	Surface Water Drainage	Policy functioning effectively and no changes considered necessary at present.
	33	Renewable Energy and Low Carbon Energy	Policy is performing as intended but will require review to reflect generation targets and advances in technology.
	34	Flooding and Coastal Inundation (Strategy Policy)	Review of policy required. The new TAN 15 and Floodmap for Planning is due to come into force shortly, which will provide a significantly different context for

			planning decisions compared to the existing framework.
	35	Development in the Coastal Change Management Area	Reconsider policy in light of new TAN 15 and Flood Map for Planning.
	36	Relocation of existing permanent dwellings affected by coastal change	Reconsider policy in light of new TAN 15 and Flood Map for Planning.
	37	Relocation and replacement of development (other than residential) affected by coastal change	Reconsider policy in light of new TAN 15 and Flood Map for Planning.
Priority D. Visitor Economy, Employment	38	Visitor Economy (Strategy Policy)	Policy is functioning effectively but <u>maywill</u> require revision in the light of changes to use class C and <u>take account of evidence on</u> the prevalence of second homes and holiday lets.
	39	Loss of Hotels and Guest Houses	Policy functioning effectively and no changes considered necessary at present.
	40	Self-Catering Development	Policy is functioning effectively but <u>maywill</u> require revision in the light of changes to use class C and the prevalence of second homes and holiday lets.
	41	Caravan, Camping and Chalet Development	Policy is functioning effectively but <u>maywill</u> require revision to reflect the <u>proposed</u> Article 4 Direction for 28-day sites.
	42	Site Facilities on Tent, Chalet and Caravan Sites	Policy is functioning effectively but <u>maywill</u> require revision to reflect the <u>proposed</u> Article 4 Direction for 28-day sites.
	43	Employment Sites and Live/Work Units (Strategy Policy)	Policy is functioning effectively. Review of the policy will be required to reflect the long-term implications of remote work stemming from the pandemic and the anticipated impact from Celtic Freeport.



	44	Protection of Employment Sites and Buildings	Policy is performing as intended but will require review.
	45	Farm Diversification	Policy is performing as intended but will require review.
Priority E. Affordable Housing and Housing	46	Housing (Strategy Policy)	The policy is functioning effectively and the level of housing growth is being delivered in accordance with targets. The revision process provides an opportunity to revisit the most appropriate levels of future housing growth for the Replacement LDP.
	47	Housing Allocations or Land with Planning Permission	The policy is functioning effectively and the housing allocations are being delivered in accordance with targets. Policy 47 requires a full review and revision to identify land for future housing development in accordance with the spatial and growth strategy.
	48	Affordable Housing (Strategy Policy)	The policy is functioning effectively and the level of affordable housing is being delivered in accordance with targets. Provision for <del>required</del> affordable housing will be reviewed and informed by evidence of affordable housing need in the latest Local Housing Market Assessment. The replacement Plan will consider ways to maximise the delivery of affordable housing.
	49	Affordable Housing Exception Sites	The policy is functioning effectively. There is a need to revise the policy to clarify that only social rented or intermediate rented tenures will be permitted on exception sites.
	50	Housing Development Proposals	The policy is functioning effectively. The policy will be reviewed to ensure it continues to be appropriate and in accordance with the LHMA and other evidence.

	51	Housing Densities	Policy is performing as intended but will require review.
	52	Housing Mix	Policy is performing as intended but will require review.
	53	Gypsy Traveller and Showpeople Sites	The policy is functioning effectively. The Authority will work with Pembrokeshire County Council as the Housing Authority to ensure the need for Gypsy and Traveller sites in Pembrokeshire is met.
Priority F. Community Facilities, Retailing, Transport	54	Community Facilities (Strategy Policy)	Policy is functioning effectively. Review of the evidence base will be required to ensure community facilities continue to address the requirements of residents within the National Park's Centres.
	55	Infrastructure Requirements (Strategy Policy)	Policy is performing as intended but will require review.
	56	Retail in the National Park (Strategy Policy)	Policy is performing as intended but will require review.
	57	Town and District Shopping Centres	Policy is performing as intended but will require review.
	58	Garden Centres	Policy has not been used in any planning applications, <u>but will require review.</u>
	59	Sustainable Transport (Strategy Policy)	Policy functioning effectively but updates required to reflect the sustainable transport hierarchy for planning and the national and regional transport strategies. Policy will be reviewed to develop an appropriate policy framework to assess and support the development of charging infrastructure <del>and Newgale Adaptation Project.</del>
	60	Impacts of Traffic	Policy functioning effectively but updates required to reflect the sustainable transport hierarchy for planning.
	61	Cycleways	Policy functioning effectively but policy will require review.
	62	Powerlines and Pipelines	Policy is performing as intended but will require review.

	63	Telecommunications	Policy is performing as intended. With TAN 19 revoked, policy wording will be assessed and updated as appropriate to reflect updated evidence and changes in national policy.
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