

Report of Planning Officer (Strategic Policy)

Subject: 2023-2024 Annual Monitoring Report on the Pembrokeshire Coast National Park Local Development Plan 2

Purpose of Report

1. The Annual Monitoring Report is a document which is produced by the Authority each October, looking back at the previous financial year, from 1 April to the 31 March.
2. The Report assesses the extent to which Local Development Plan 2 strategy and policies are being achieved.
3. The Report measures various indicators to assess the performance of the individual planning policies set out in the adopted Local Development Plan and to provide a general portrait of the social, economic and environmental conditions in the Park.
4. 'Key Findings' can be found at the beginning of the document which sets out where issues have arisen and what further action is required.
5. This is the third Annual Monitoring Report since the adoption of Local Development Plan 2 in September 2020 covering the financial year April 2023 to end of March 2024. Members are asked to agree this Annual Monitoring Report for submission to Welsh Government by the end of October 2024.
6. The second Annual Monitoring Report was published for consultation and the representations received are in Appendix B along with an Officer proposed response. Members are asked to agree these responses.
7. The Authority has a statutory duty to keep the development plan up to date. Section 69 (1) of the Planning and Compulsory Purchase Act (2004) and LDP Regulation 41 (1) require LPAs to undertake a formal review of their plan no longer than 4 years from the date of its adoption. The review of Local Development Plan 2 will therefore commence in September 2024.

Risk considerations

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

Financial considerations

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

Equality considerations

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

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

Welsh Language considerations

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

Human Rights considerations

13. The planning system seeks to progress legitimate aims by managing the development and use of land in the public interest to contribute to achieving sustainable development. It reconciles the needs of development and conservation, securing economy, efficiency, and amenity in the use of land, and protecting natural resources and the historic environment. Human rights under Articles 1 (right to peaceful enjoyment to property), 8 (right to respect for the home, private and family life) and 14 (right to equality), are the most relevant ones. Proportionality means that the measure which interferes with the right must strike a fair balance between the aim and the right which it interferes with.

14. The process for Local Development Plan preparation and its rigorous assessment procedures will support this approach. This, however, is a monitoring report and does not contain policy, procedure, practice, or guidelines.

Recommendation

- (1) That the responses to the representations received in Appendix B to this report be approved.**
- (2) That the attached Annual Monitoring Report (see Appendix A) for the Pembrokeshire Coast National Park Local Development Plan 2 be approved for submission to the Welsh Government by the 31st October 2024.**

Background Documents

Pembrokeshire Coast National Park Local Development Plan 2

Development Plans Manual Edition 3 Welsh Government

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

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

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

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



Annual Monitoring Report 3

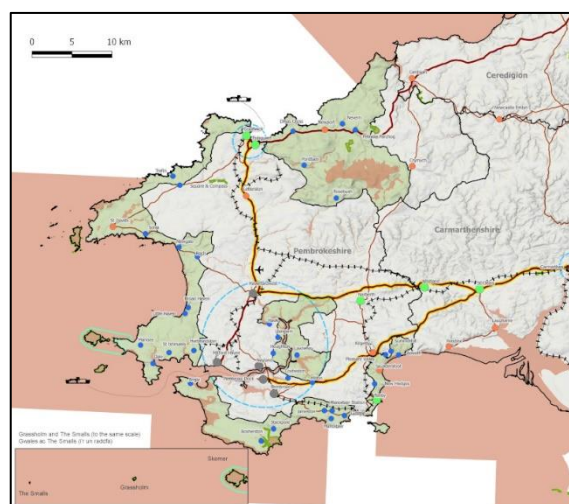
September 2024

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1. Introduction

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



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

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

1.4 This third report is for the financial year April 2023 to end of March 2024.

2. Key trends at a glance

- 2.1 This is the third Annual Monitoring Report for the Pembrokeshire Coast National Park Local Development Plan 2. It covers the second full financial year since Local Development Plan 2 was adopted in September 2020 and covers the financial year from April 2023 to March 2024. It is a statutory requirement for the report to be submitted to the Welsh Government by the 31 October 2024.
- 2.2 The report measures various indicators which assess the performance of the individual policies of Local Development Plan 2.
- 2.3 The key trends for each policy and sustainability objective are shown below and are colour coded as a visual aid to show an overview of the performance of the policies.
- 2.4 The indicators show overall the policies are being implemented effectively and that targets and objectives of Local Development Plan 2 are being achieved.




| LDP Indicator No. | Topic | Performance Versus Target |
|--------------------------|------------------------------|----------------------------------|
| 1 | Contrary to Recommendation | Continue Monitoring |
| 2 | National Park Purposes | Continue Monitoring |
| 3 | Sustaining Communities | Continue Monitoring |
| 4 | Special Qualities | Continue Monitoring |
| 5 | Welsh Language | Continue Monitoring |
| 6 | Landscape Seascape | Continue Monitoring |
| 7 | Greenfield | Continue Monitoring |
| | Open Space | Continue Monitoring |
| | Green Wedge | Continue Monitoring |
| 8 | Major Development | Continue Monitoring |
| 9 | Minerals Applications | Continue Monitoring |
| 10 | Waste Management | Continue Monitoring |
| 11 | Sustainable Design | Continue Monitoring |
| 12 | Renewable Energy Heat | Continue Monitoring |
| 13 | Renewable Energy Electricity | Continue Monitoring |
| 14 | Renewable Guidance | Continue Monitoring |
| 15 | Flooding | Continue Monitoring |
| 16 | Recreation | Continue Monitoring |
| 17 | Hotels | Continue Monitoring |
| 18 | Self Catering | Continue Monitoring |
| 19 | Caravan & Camping | Continue Monitoring |
| 20 | Employment | Continue Monitoring |
| 21 | Loss of Employment | Continue Monitoring |
| 22 | Indicator withdrawn by WG | |
| 23 | Affordable Housing | Continue Monitoring |
| 24 | All Housing | Continue Monitoring |
| 25 | Viability | Continue Monitoring |

| LDP Indicator No. | Topic | Performance Versus Target |
|--------------------------|----------------------|----------------------------------|
| 26 | Gypsy Sites | Continue Monitoring |
| 27 | Density | Continue Monitoring |
| 28 | Mix of housing | Continue Monitoring |
| 29 | Spatial Distribution | Continue Monitoring |
| 30 | Tenure of Housing | Continue Monitoring |
| 31 | Community Facilities | Continue Monitoring |
| 32 | Planning Obligations | Continue Monitoring |
| 33 | Retail Hierarchy | Continue Monitoring |
| 34 | Vacant Retail Space | Continue Monitoring |
| 35 | Transport | Continue Monitoring |

| Sustainability Appraisal Indicator No. | Topic | Analysis |
|---|--|---|
| 1 | Agriculture & Forestry | Further data is required to make conclusions – latest data included. |
| 2 | Travel | Performance remains acceptable |
| 3 | Special Qualities | 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 |
| 9 | Access to Housing | Performance remains acceptable |
| 10 | Cultural Distinctiveness | Performance remains acceptable |
| 11 | Minerals | Performance remains acceptable |
| 12 | Waste | Performance remains acceptable |
| 13 | Community Facilities | Performance remains acceptable |
| 14 | Biodiversity enhancement | Performance remains acceptable |
| 15 | Water Quality | The strategy of the Plan is not affected by current issues with phosphorous elsewhere in Pembrokeshire. |

3. Monitoring Indicators

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

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

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

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

National Park purposes and duty and the spatial strategy

Key outcomes

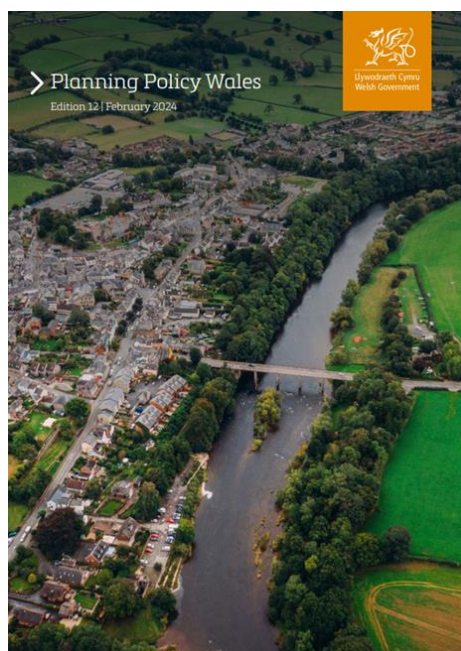
- 1) The special qualities of the National Park have been conserved and enhanced.
- 2) Development takes place in accordance with the strategy of the Local Development Plan.
- 3) Development permitted helps to sustain local communities.

Context

3.5 Planning Policy Wales Edition 12¹

This edition was published in February 2024. Paragraphs 4.2.5 – 4.2.10 now includes the requirement for planning authorities to consider localised issues such as the prevalence of second homes and short-term lets when developing requirements for market and affordable homes, including the consideration of introducing caps or ceilings on the number of second homes or short-term lets. This Annual Monitoring Report chapter on Visitor Economy provides more commentary on this issue.

3.6 Chapter 6 of PPW 12 places a stronger emphasis on taking a proactive approach to Green Infrastructure and includes the requirement for all development proposals to be accompanied by a green infrastructure statement and a requirement for planning authorities to produce green infrastructure assessments which should underpin the Development Plan. All development proposals are required to demonstrate a net benefit for biodiversity. PPW 12 also provides a strengthened policy approach to the protection for Sites of Special Scientific Interest and guidance on trees and woodlands, with the promotion of new planting.



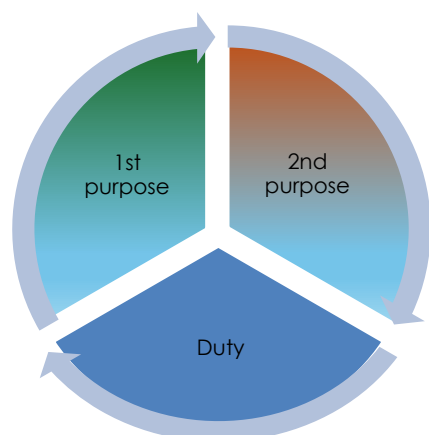
3.7 Community Facilities Survey

¹ [Planning Policy Wales - Edition 12 \(gov.wales\)](https://gov.wales/planning-policy-wales-edition-12)

For the review of Local Development Plan 1, a survey of community facilities in settlements was undertaken in 2017. Those with at least 3 facilities normally found in a small village were designated as 'Rural Centres' in LDP2. Policy 54 of the Local Development Plan also protects against unnecessary loss of community facilities and prioritises the re-use of land for employment uses or affordable housing where a loss of the facilities is justified.

- 3.8 A follow up survey was undertaken in 2022 which found a loss of qualifying facilities in two split Centres, where the lost facilities were outside this Authority's planning jurisdiction. A further survey undertaken in 2023 found that 3 Centres have lost their convenience shop, although they still have sufficient facilities to qualify as Rural Centres. Two of the Centres are split Centres with the former shop being outside of this Authority's jurisdiction. In addition, two Centres have lost a pub. One of these is wholly within the National Park and retains sufficient services to remain as a Rural Centre. The other is a split Centre and now would have insufficient services to qualify as a Rural Centre.
- 3.9 The changes recorded are not significant in nature. There will be a need to continue monitoring and appraise at review stage and to consider the need to comment on Pembrokeshire County Council's LDP2 community facilities policy when the opportunity arises. In terms of the larger Centres, the range of facilities required to qualify these Centres as Tier 1 and Tier 2 Centres remain.

POLICY PERFORMANCE



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

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

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

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

Indicator 1

Decisions contrary to recommendation

Target is 0

Trigger: 3% of planning applications² decided contrary to recommendation in any one year.

| Year | Total Decisions | Contrary | Trigger | Target | Performance | Action | Analysis | Overview |
|------------|-----------------|----------|---------|--------|-------------|---------------------|--|----------|
| 2021- 2022 | 363 | 1 | 3% | 0% | 0% | Continue Monitoring | Performance remains below the Trigger point. | ● |
| 2022-2023 | 391 | 4 | 3% | 0% | 1% | Continue Monitoring | Performance remains below the Trigger point – see analysis in AMR 2. | ● |
| 2023- 2024 | 322 | 1 | 3% | 0% | 0% | Continue Monitoring | Performance remains below the Trigger point – see analysis on next page. | ● |

² Full, outline or reserved matters applications.

Analysis 2023-2024:

1 application was decided contrary to recommendation. The application was recommended for refusal as being contrary to Policy 14 (see Indicator 6).




The trigger of 3% has not been breached and the Local Development Strategy has not been undermined.

Indicator 2

Policy 1 decisions contrary to Sandford Principle or which result in conflicts between the duty and purposes.

Target is 0

Trigger: 0 applications approved contrary to the Sandford Principle in any one year.




| Year | Trigger | Target | Performance | Action | Analysis | Overview |
|------------|---------|--------|-------------|--|--|---|
| 2021- 2022 | 1 | 0 | 1 | Further Investigation/ Research Required | See AMR 1 for analysis |  |
| 2022-2023 | 1 | 0 | 3 | Training Required | See AMR 2 for analysis |  |
| 2023-2024 | 1 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |

Indicator 3

Decisions contrary to Policy 7, Policy 43, Policy 44, Policy 48, Policy 54 – Prioritise Community Uses

Target is 0

Trigger: Approval of 2 planning applications contrary to a policy in any one year.

| Year | Trigger | Target | Performance | Action | Analysis | Overview |
|------------|---------|--------|-------------|---------------------|--|---|
| 2021- 2022 | 2 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |
| 2022-2023 | 2 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |
| 2023- 2024 | 2 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |

Special qualities

Key outcomes

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

Context

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

Policy Performance




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

Indicator 4




Decisions contrary to Policy 8 Special Qualities

Target is 0

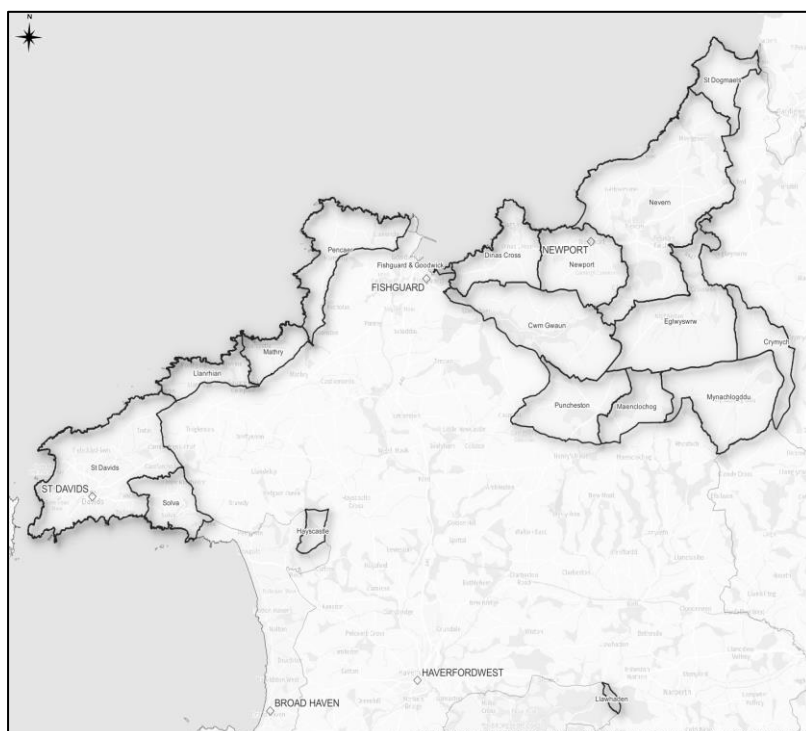
Trigger: Approval of 2 planning applications contrary to any criterion in any one year.

| Year | Trigger | Target | Performance | Action | Analysis | Overview |
|------------|---------|--------|-------------|--|--|---|
| 2021- 2022 | 2 | 0 | 1 | Further Investigation/ Research Required | See AMR 1 for analysis. |  |
| 2022-2023 | 2 | 0 | 3 | Training Required. | See AMR 2 for analysis |  |
| 2023-2024 | 2 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |

Indicator 5**Decisions contrary to Policy 13 Welsh Language****Target is 0****Trigger: Approval of 2 planning applications contrary to the policy in any one year.**




| Year | Trigger | Target | Performance | Action | Analysis | Overview |
|------------|---------|--------|-------------|---------------------|---|---|
| 2021- 2022 | 2 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point |  |
| 2022-2023 | 2 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point |  |
| 2023-2024 | 2 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point |  |

Policy 13 of LDP2 protects against developments which would have a significant effect on the Welsh Language. The policy applies to developments of 10 or more dwellings; 1,000 square metres of floorspace or is more than 1 hectare in size which are outside Centre boundaries within the Welsh Language Sensitive Areas, shown on the map below. No proposals were determined contrary to the policy during the monitoring period.



Welsh Language Sensitive Areas

Indicator 6**Decisions contrary to Policy 14 Landscape & Seascape****Target is 0****Trigger: Approval of 2 planning applications contrary to the policy with its supporting guidance in any one year.**




| Year | Trigger | Target | Performance | Action | Analysis | Overview |
|-----------|---------|--------|-------------|--|---|---|
| 2021-2022 | 2 | 0 | 1 | Further Investigation/ Research Required | See AMR 1 for analysis. |  |
| 2022-2023 | 2 | 0 | 1 | Training Required | See AMR 2 for analysis |  |
| 2023-2024 | 2 | 0 | 1 | Continue monitoring | In assessing the impact upon the National Park under Policy 14, matters of detail and cumulative impact will be given special consideration. Officers considered that 3 additional polytunnels would intensify the use of the site and will result in increased visual intrusion. Members approved the application considering that the landscape impact not such that there was a conflict with the polices of the LDP and an economic benefit to the local community. |  |

Indicator 7**Decisions Contrary to Policy 15 or Policy 16**




Target is 0% loss of greenfield³, open space⁴, green wedge.

Trigger: Approval of 1 planning applications contrary to recommendation in any one year.

Indicator 7 Greenfield

| Year | Trigger | Target | Performance | Action | Analysis | Overview |
|------------|---------|--------|-------------|---------------------|--|---|
| 2021- 2022 | 1 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point |  |
| 2022-2023 | 1 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |
| 2023-2024 | 1 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |




Indicator 7 Open Space

| Year | Trigger | Target | Performance | Action | Analysis | Overview |
|------------|---------|--------|-------------|---------------------|--|---|
| 2021- 2022 | 1 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point |  |
| 2022-2023 | 1 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |
| 2023-2024 | 1 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |

³ Except for land released in accordance with the Plan's policies.

⁴ Except where they can be retained, enhanced or alternative provision can be made.

Indicator 7 Green Wedge

| Year | Trigger | Target | Performance | Action | Analysis | Overview |
|------------|---------|--------|-------------|---------------------|--|---|
| 2021- 2022 | 1 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point |  |
| 2022-2023 | 1 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |
| 2023-2024 | 1 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |

Major development, the potential for growth

Key outcomes

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

Context

3.11 **Minerals:** The annual monitoring of reserves and the 2nd review of the Regional Technical Statement (RTS) for the North Wales and South Wales Regional Aggregate Working Parties will continue to inform planning decisions on a regional and national basis. The 2nd review was endorsed by Welsh Government in December 2020 and noted by Pembrokeshire Coast National Park Authority Members. The purpose of the RTS is to ensure that an adequate and steady supply of aggregates can be maintained throughout Wales (and beyond, in the case of materials that are exported) taking into account the key objectives of sustainable supply of minerals set out in Minerals Technical Advice Note 1. Pembrokeshire Coast National Park Authority continues to work with neighbouring authorities on a Statement of Sub-Regional Collaboration for the West Wales sub-region for sand and gravel.

3.12 **Waste:** The third report for the new region of Mid and South-West Wales Waste Planning Monitoring Report covers the period 2023-24. Information on the region's waste management / resources recovery facilities is required in order to monitor implementation of 'Towards Zero Waste: One Wales One Planet (TZW, 2010) – The Overarching Waste Strategy Document for Wales'. The report was submitted to Welsh Government in March 2024. It is yet to be published, but highlights the following key findings:

- Overall, the region is meeting targets in respect of reducing local authority collected waste, increasing recycling and composting and reducing landfilled biodegradable municipal waste, reusing, recovering and recycling industrial and commercial waste and construction and demolition waste and reducing the amounts of hazardous waste landfilled.
- There has been a steady increase in recycling and composting rates over the years. The Mid and SW Wales region has consistently performed better than Wales as a whole for most of the last nine years, and the Towards Net Zero target of achieving at least 64% recycling by 2019/20 was achieved at both the regional and Wales level. Whilst there was a slight reduction at the regional level in the most recent reporting period (2021/22), the 2024/25 target of 70% (which Pembrokeshire has already met for the third consecutive year) looks achievable.
- The predicted remaining landfill capacity for the region is 6.1 years, (an increase in voidspace from last year's 5.5 years). Whilst this has not dropped below the 5 year trigger set out in Technical Advice Note 21: Waste – the threshold identified for pursuing any action which may be necessary to facilitate future landfill provision – the situation would suggest that preliminary discussions in terms of appropriate actions should be considered by the stakeholders concerned. This

would include Welsh Government, Natural Resources Wales, local authorities (both Planning and Waste Teams) as well as the Waste Industry.

- Pembrokeshire remains one of only 5 authorities in Wales already meeting the 2024/25 target of 70% for recycling rates, achieving 71.6% in the 2022/23 recording period.




Policy Performance

Indicator 8

Approval of major development⁵ unless exceptional circumstances proven




Target is 0

Trigger: Approval of 1 proposal where no exceptional circumstances shown




| Year | Trigger | Target | Performance | Action | Analysis | Overview |
|------------|---------|--------|-------------|---------------------|--|---|
| 2021- 2022 | 1 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |
| 2022-2023 | 1 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |
| 2023-2024 | 1 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |

⁵ What constitutes 'major development' and 'exceptional circumstances' in National Parks is defined in Planning Policy Wales.

Indicator 9**Approval of minerals development⁶ unless exceptional circumstances proven****Target is 0****Trigger: Approval of 1 proposal where no exceptional circumstances shown**

| Year | Trigger | Target | Performance | Action | Analysis | Overview |
|------------|---------|--------|-------------|---------------------|---|---|
| 2021- 2022 | 1 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |
| 2022-2023 | 1 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. ⁷ |  |
| 2023- 2024 | 1 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |

Indicator 10**Decisions contrary to Policy 27, 28 waste management facilities****Target is 0****TRIGGER: Approval of 2 planning applications contrary to the policies**

| Year | Trigger | Target | Performance | Action | Analysis | Overview |
|------------|---------|--------|-------------|---------------------|--|---|
| 2021- 2022 | 2 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |
| 2022-2023 | 2 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |
| 2023-2024 | 2 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |

⁶ What constitutes 'exceptional circumstances' in National Parks is defined in Planning Policy Wales.

⁷ Variation of condition for an additional 12 years for excavation, restoration and aftercare at a quarry granted approval. Not a new or extended mineral site and therefore trigger not breached.

Climate Change, Sustainable Design, Flooding, Sustainable Energy

Key outcomes

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

Context

3.13 **Flooding:** Welsh Government made available an updated Technical Advice Note 15 on flooding in September 2021 which also incorporates coastal erosion. The intention was for it to come into effect at the beginning of December 2021. The policy guidance contained in the Technical Advice Note is much stricter in terms of not permitting highly vulnerable development (houses, schools, hospitals etc.) in areas of risk from flooding or erosion. The Technical Advice Note also takes into account climate change to forecast future flood risks and requires higher thresholds for flood defences. In addition, the Development Advice Maps will be replaced with new Flood Maps for Planning, developed, and published by Natural Resources Wales.

3.14 In response to concerns raised by Local Planning Authorities, Julie James, Minister for Climate Change, wrote to all local planning authorities in November 2021 announcing a postponement in the coming into force of the revised Technical Advice Note until 1st June 2023 to allow full consideration of the impact of the new guidance. In the meantime, the existing Technical Advice Note and Development Advice Map remains as the framework for assessing flood risk. In addition, in a letter from Welsh Government, dated 15 December 2021, it was stated that the Flood Map for Planning represents the most up to date information on areas at risk from flooding and should also inform decision making.

3.15 **The Minister's letter also required every local planning authority complete (or review) a strategic flood consequence assessment for their area, individually or on a regional basis.** The National Park Authority joined with other planning authorities in South-West Wales to commission consultants to undertake a Regional Strategic Flood Consequence Assessment for the region the publication of which is due (October 2022). Separately, Carmarthenshire County Council and Pembrokeshire County Council commissioned consultants to carry out some more detailed local work on the same topic in conjunction with the emerging the emerging Development Plans of each authority.

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

3.17 Almost at the same time the Welsh Government issued a second consultation on the emerging TAN15, specifically relating to further amendments made to the document as a result of the first consultation. That consultation closed in April 2023. The deadline of 1st June 2023 for the publication of the revised TAN has now passed and it is anticipated by the end of this calendar year.

3.18 In the meantime the Stage 1 SFCA for the SW Wales area was completed in December 2022. The report details past known flood events, which within the National Park are at Solva, Nevern, Dale, Amroth, Broad Haven, Angle, Tenby and Newport Parrog. The greatest risk within the National Park is tidal flooding which is likely to occur during storm surge conditions. This can occur in unprotected areas and also where defences are breached by means of a mechanical failure or overtopping. It is noted that tides may affect flooding much further inland during extreme events, especially if sea levels rise as predicted.

3.19 The study concludes that many of the Authorities within the south-west Wales region will need to progress to stage 2 or 3 SFCA to support Local Development Plan development. These stages will identify the potential for flooding of candidate sites and if necessary whether it can be managed to an acceptable level. Progression beyond Stage 1 for the National Park area was not considered necessary as none of the sites allocated for development in LDP2 are in flood risk areas.

3.20 No further update regarding TAN 15 has been issued by Welsh Government (as of 31 March 2024).




Policy Performance

Indicator 11




Decisions contrary to Policy 29 'Sustainable Design' criterion C), E), G), H) or I).

Target is 0

Trigger: Approval of 3 planning applications contrary to any one of the policy's criteria

| Year | Trigger | Target | Performance | Action | Analysis | Overview |
|------------|---------|--------|-------------|---------------------|--|---|
| 2021- 2022 | 3 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |
| 2022-2023 | 3 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |
| 2023-2024 | 3 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |




Indicator 12**Renewable Energy Capacity of renewable energy schemes permitted and completed.****Target is 9.8GWh for renewable heat⁸**

| Year | Target | Performance | Action | Analysis | Overview |
|------------------|--|---|---------------------|--|---|
| 2021-2022 | Planning Permissions to contribute to an overall renewable Heat Target for the National Park of 9.8 GWh. | 0.46 GWh from 5 permissions granted since 2016 (base date of Renewable Energy Assessment Update) | Continue Monitoring | There has been a small increase in capacity as a result of relatively small scale, domestic installations permitted. Renewable Energy from micro household renewable schemes and small scale nondomestic schemes generally benefit from Permitted Development Rights and therefore are not included in the overall Heat generation capacity. |  |
| 2022-2023 | Planning Permissions to contribute to an overall renewable Heat Target for the National Park of 9.8 GWh. | 0.495 GWh from 7 permissions granted since 2016 (base date of Renewable Energy Assessment Update) | Continue Monitoring | As above. |  |
| 2023-2024 | Planning Permissions to contribute to an overall renewable Heat Target for the National Park of 9.8 GWh. | 0.506 GWh from 8 permissions granted since 2016 (base date of the Renewable Energy Assessment Update) | Continue Monitoring | As above. |  |

⁸ This target is aspirational, dependent upon a range of factors in the future such as government changes in policy, funding opportunities/constraints, as well as other external factors.

Indicator 13

Renewable energy capacity of renewable energy schemes permitted and completed.
Target is 38.9GWh for renewable electricity⁹.

| Year | Target | Performance | Action | Analysis | Overview |
|------------------|--|--|---------------------|--|---|
| 2021-2022 | Planning Permissions to contribute to an overall Renewable Electricity Target for the National Park of 38.9 GWh. | 0.035 GWh from 9 permissions granted since 2016 (base date of the Renewable Energy Assessment Update) | Continue Monitoring | There has been a small increase in capacity as a result of relatively small scale, domestic installations permitted. Renewable Energy from micro household renewable schemes and small scale non domestic schemes generally benefit from Permitted Development Rights and therefore are not included in the overall Electricity generation capacity. |  |
| 2022-2023 | Planning Permissions to contribute to an overall Renewable Electricity Target for the National Park of 38.9 GWh. | 0.067 GWh from 14 permissions granted since 2016 (base date of the Renewable Energy Assessment Update) | Continue Monitoring | As above. |  |
| 2023-2024 | Planning Permissions to contribute to an overall Renewable Electricity Target for the National Park of 38.9 GWh. | 0.269 GWh from 20 permissions granted since 2016 (base date of the Renewable Energy Assessment Update) | Continue Monitoring | As above |  |




⁹ This target is aspirational, dependent upon a range of factors in the future such as government changes in policy, funding opportunities/constraints, as well as other external factors

Indicator 14

Decision making is consistent with the Authority's Renewable Energy Policy as supported by the Renewable Energy Supplementary Planning Guidance and Cumulative Impact of Wind Turbines on Landscape and Visual Amenity Supplementary Planning Guidance

Target is 0 approvals contrary

Trigger: 3 or more decisions contrary to Policy 33 Renewable Energy in conjunction with its supporting Supplementary Planning Guidance.




| Year | Trigger | Target | Performance | Action | Analysis | Overview |
|------------|---------|--------|-------------|---------------------|--|---|
| 2021- 2022 | 3 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |
| 2022-2023 | 3 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |
| 2023-2024 | 3 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |

Indicator 15

Flooding: Amount of development (by TAN 15 paragraph 5.1 development category) permitted in C1 and C2 floodplain areas not meeting all TAN 15 tests (paragraph 6.2 I-v)

Target is development is not permitted where the long term scenario (in the next 100 years) would fail the tests set out across.

Trigger: 1 Development permitted contrary to Policy 34

| Year | Trigger | Target | Performance | Action | Analysis | Overview |
|------------|---------|--------|-------------|---|---|---|
| 2021- 2022 | 1 | 0 | 1 | Further Investigation / Research Required | See AMR 1 for analysis. |  |
| 2022-2023 | 1 | 0 | 2 | Training Required | See AMR 2 for analysis |  |
| 2023- 2024 | 1 | 0 | 0 | Continue Monitoring | Performance is below the Trigger point. |  |

Visitor Economy, Employment and Rural Diversification

Key outcomes

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

Context

3.21 **Welsh Government and policy for second homes and short-term holiday lets** **Welsh Government**¹⁰ announced on the 28^h of September 2022:

- Changes to planning regulations. These introduced three new planning use classes – a primary home (C3), a second home (C5) and short-term let accommodation (C6). Local planning authorities, where they have evidence, will be able to make amendments to the planning system to require planning permission for change of use from one class to another. They have also introduced changes to national planning policy to give local authorities the ability to control the number of second homes and holiday lets in any community.

3.22 The National Park Authority considered the imposition of planning conditions on applications for planning permission on a case-by-case basis via the normal development management procedures.¹¹ In consideration of the appropriateness of applying occupancy conditions, officers consider how Strategy Policy 46 (Housing), Policy 40 (Self-catering Development), Policy 47 (Housing Allocations or Land with Permissions) and Policy 48 (Affordable Housing) apply. In addition, Officers also undertake desk-based analysis on the prevalence of second homes and holiday lets which includes cluster analysis and the prevalence in similar developments in the area as well as recent developments. The outcome of such analysis determines whether a C3 occupancy condition is applied to a permission.

3.23 **Camping and Caravanning developments:** Adoption of Local Development Plan 2 brought a change of policy for camping and caravanning developments. Local Development Plan 1 continued a long-standing policy of restraint for further caravan and camping sites due to the significant number already within the National Park. Whilst operating the Local Development Plan 1 policy, issues emerged with Certificated camping sites and 28-day sites, both outside planning control. An increasing number of sites were appearing in the National Park through these means, with Certification being a regular default for landowners refused planning permission or given pre-planning advice that a site would be contrary to policy. The prolific number of 28-day sites also overwhelmed the Authority's ability to monitor activity and the protracted enforcement process is not effective in dealing with those sites operating beyond the 28 days. As a result, the Authority was receiving an increasing number of Certificate of Lawfulness applications for large camping and caravan sites.




¹⁰ [Written Statement: Changes to planning legislation and policy for second homes and short-term lets](#)

¹¹ [National Park Authority Report: The implications of recent Welsh Government Legislative and Planning Policy Changes in relation to Second Homes and Short-term Lets](#)




- 3.24 As part of the evidence base for Local Development Plan 2, in 2015 a study was undertaken to explore the potential for the National Park landscape to safely absorb additional camping and caravan development without harming its special qualities. The study informed the changes to the policy for Local Development Plan 2 and has also been published as Supplementary Planning Guidance. The Local Development Plan 2 policy for camping and caravanning development can be summarised as allowing for limited new development in appropriate locations – generally small sites away from the coast and Preseli Hills.
- 3.25 The outcome of relaxing the policy position on new sites needs to be monitored. Adoption of Local Development Plan 2 has coincided with the Covid pandemic which has resulted in significant changes to the visitor economy in Pembrokeshire and a dramatic increase in the number of visitors using camping and caravanning accommodation. This has continued the demand for additional sites – largely through the Certification process, but also in terms of ‘fly-camping’ with favoured locations being the coast, beaches, laybys, rural car parks and viewpoints.
- 3.26 Overall, during this monitoring period there have been 3 planning applications for camping, caravan and chalet development which were approved. There was no increase in static caravan pitches but 5 glamping pods and a meet and greet building were approved. All approvals were for development on existing caravan sites.
- 3.27 **Welsh Government Consultation on Permitted Development:** Following the temporary changes to permitted development during the Covid Pandemic, the Welsh Government published a consultation document in November 2021 on whether any or all of the changes should be made permanent. **One of the changes proposed related to extending the current 28-day permitted development for land to be used as a camping site to 56 days.** The Authority responded that the change should not be applied within the National Park as they are unregulated and impact on the landscape and special qualities. The consultation has now ended and has concluded that any changes to the 28-day rules will be reviewed in a future update of the permitted development rights.
- 3.28 There continues to be widespread disregard for regulations for camping and caravan sites outside of planning control in the National Park with both 28-day sites and Exemption Certificate sites operating well beyond their permitted development period. Monitoring of these sites continues to challenge the limited resources of the Authority.
- 3.29 Between November 2023 and March 2024, the Authority carried out a number of workshops and meetings with National Park Authority Members, Statutory Undertakers, Tourism Stakeholders and Welsh Government to discuss whether the Authority should consider imposing an Article 4 direction to remove permitted development rights for 28-day camping and caravan sites and the introduction of a voluntary Code of Conduct for Exempted Organisation sites. It was agreed that a public consultation on the preferred options would take place later in 2024.

Policy Performance




Indicator 16**Decisions relating to recreational activities contrary to Policy 38****Target is 0****Trigger: Approval of 2 planning applications contrary to the policy in conjunction with the recreational activities supplementary Planning Guidance**

| Year | Trigger | Target | Performance | Action | Analysis | Overview |
|------------|---------|--------|-------------|---------------------|--|---|
| 2021- 2022 | 2 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |
| 2022-2023 | 2 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |
| 2023-2024 | 2 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |




Indicator 17**Decisions on Loss of Hotels – Policy 39****Target is 0****Trigger: Approval of 1 planning application contrary to policy**

| Year | Trigger | Target | Performance | Action | Analysis | Overview |
|------------|---------|--------|-------------|---------------------|--|---|
| 2021- 2022 | 1 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |
| 2022-2023 | 1 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |
| 2023-2024 | 1 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |




Indicator 18**Prioritising affordable housing delivery over self catering – Policy 40****Target is 0****Trigger: Approval of 2 application contrary to Policy 40 in any one year**

| Year | Trigger | Target | Performance | Action | Analysis | Overview |
|------------|---------|--------|-------------|---------------------|--|---|
| 2021- 2022 | 2 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |
| 2022-2023 | 2 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |
| 2023-2024 | 2 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |




Indicator 19**Caravan and camping – Policy 41****Target is 0****Trigger: Approval of 2 or more developments contrary to Policy 41 with its supporting Supplementary Planning Guidance**

| Year | Trigger | Target | Performance | Action | Analysis | Overview |
|------------|---------|--------|-------------|---|--|---|
| 2021- 2022 | 2 | 0 | 1 | Further Investigation / Research Required | See AMR 1 for analysis. |  |
| 2022-2023 | 2 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |
| 2023-2024 | 2 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |

Indicator 20**Employment – Policy 43****Target is 0****Trigger: Approval of 1 or more planning applications contrary to the policy**

| Year | Trigger | Target | Performance | Action | Analysis | Overview |
|------------|---------|--------|-------------|---------------------|--|---|
| 2021- 2022 | 1 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |
| 2022-2023 | 1 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |
| 2023-2024 | 1 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |

Indicator 21**Employment – Policy 44****Target is 0****Trigger: Loss of two or more employment sites or 500 sq. metres contrary to recommendation**

| Year | Trigger | Target | Performance | Action | Analysis | Overview |
|------------|---------|--------|-------------|---------------------|--|---|
| 2021- 2022 | 2 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |
| 2022-2023 | 2 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |
| 2023-2024 | 2 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |

2E Affordable housing and housing growth

Key outcomes

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

Context

3.30 Housing Market: The nature of the housing market over the lifespan of the Local Development Plan is and will be the subject of much conjecture and conflicting forecasts. The link below provides detailed commentary on housing starts and completions in Wales recently.¹²

3.31 Welsh Government and policy for second homes and short-term holiday lets: The National Park Authority continues to engage with Welsh Government local stakeholders such as Pembrokeshire County Council on Welsh Government initiatives. More commentary is provided in the Visitor Economy, Employment and Rural Diversification chapter.

3.32 Local Housing Market Assessment July 2021¹³: The Authority is party to a County wide housing market assessment which will replace the 2021 Assessment. The draft 2023 LHMA is awaiting approval by Welsh Government.

Policy Performance

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

Indicator 23

Policy 47, Policy 48, Policy 49 - The number of net additional affordable dwellings built

Target: 362 Affordable dwellings built over the plan period

Trigger: Completions 10% below the target expected by the formal Plan review period (Review Trigger is before September 2024 Year 4 of the adopted Plan). Undertake research to establish reasons and dependent on findings consider whether actions are necessary to increase supply.

Completions 25% less than targets – determine actions to increase supply of affordable housing, including consideration of additional housing allocations.

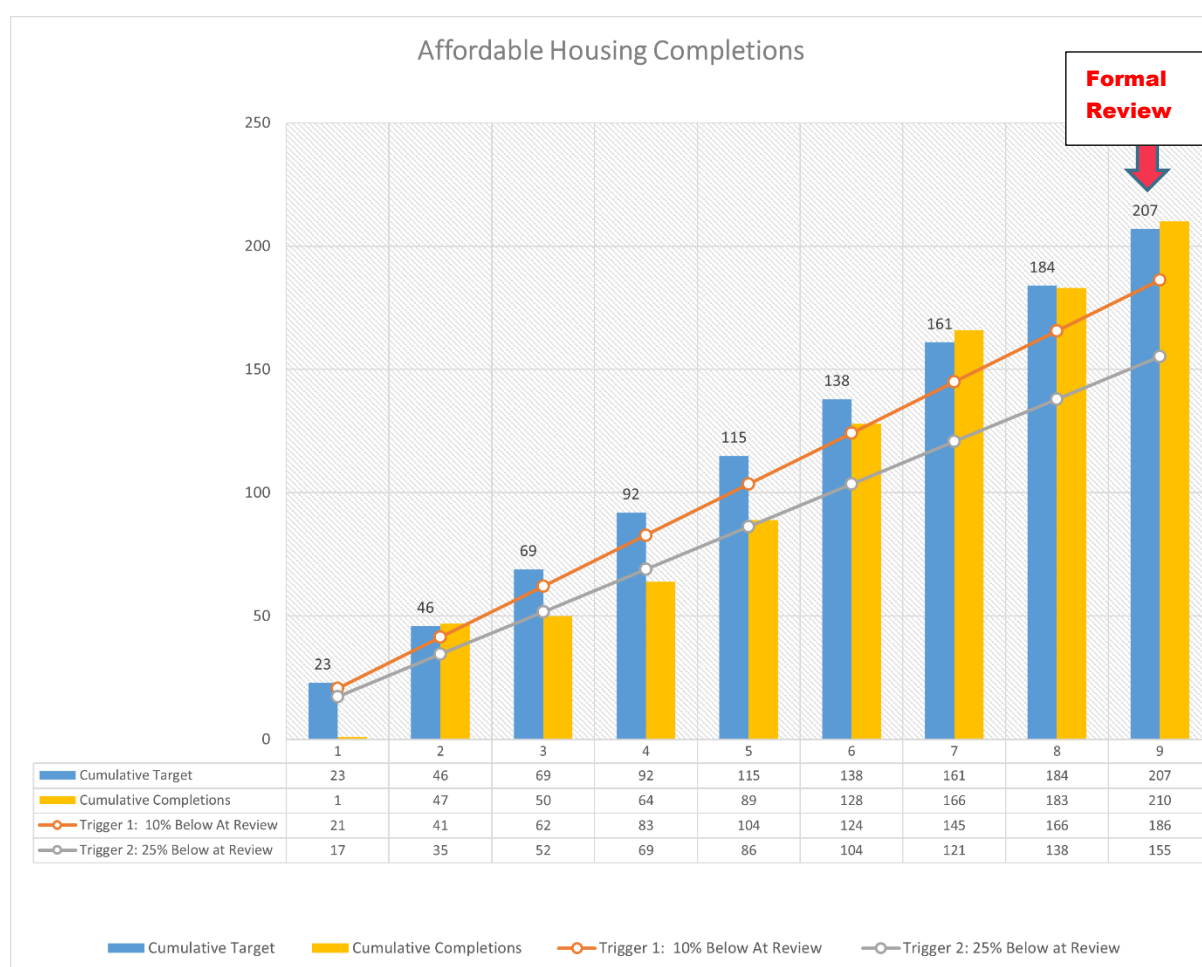
3.34 The next table and graph provides a breakdown on performance. There will be a need to consider performance at Review Stage **i.e., before Sept 2024 Year 10.**

¹² [Welsh Government: New house building](#)

¹³ Local Housing Market Assessment July 2021 [Pembrokeshire County Council Local Development Plan Review: LDP2 Evidence base](#)

3.35 Performance to date is from the base date of 2015 and shows the 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 | ● |



3.36 Affordable housing completions will continue to be monitored to the review period 2024. Sites are also mapped on our website.¹⁴

¹⁴ [Local Development Plan Annual Monitoring \(arcgis.com\)](http://Local Development Plan Annual Monitoring (arcgis.com))










Indicator 24**Policy 46, Policy 47, Policy 50 The number of net additional dwellings built¹⁵**

Target: 960 dwellings built over the Plan period at an average rate of 62 dwellings per annum (from April 2019) over the Plan period (as indicated in the Housing Trajectory – See Table Below)

Trigger: Completions 10% below the target expected by the formal Plan review period (Review trigger is before September 2024 Year 4 of the Adopted Plan). Undertake research to establish reasons and dependent on findings consider whether actions are necessary to increase supply.

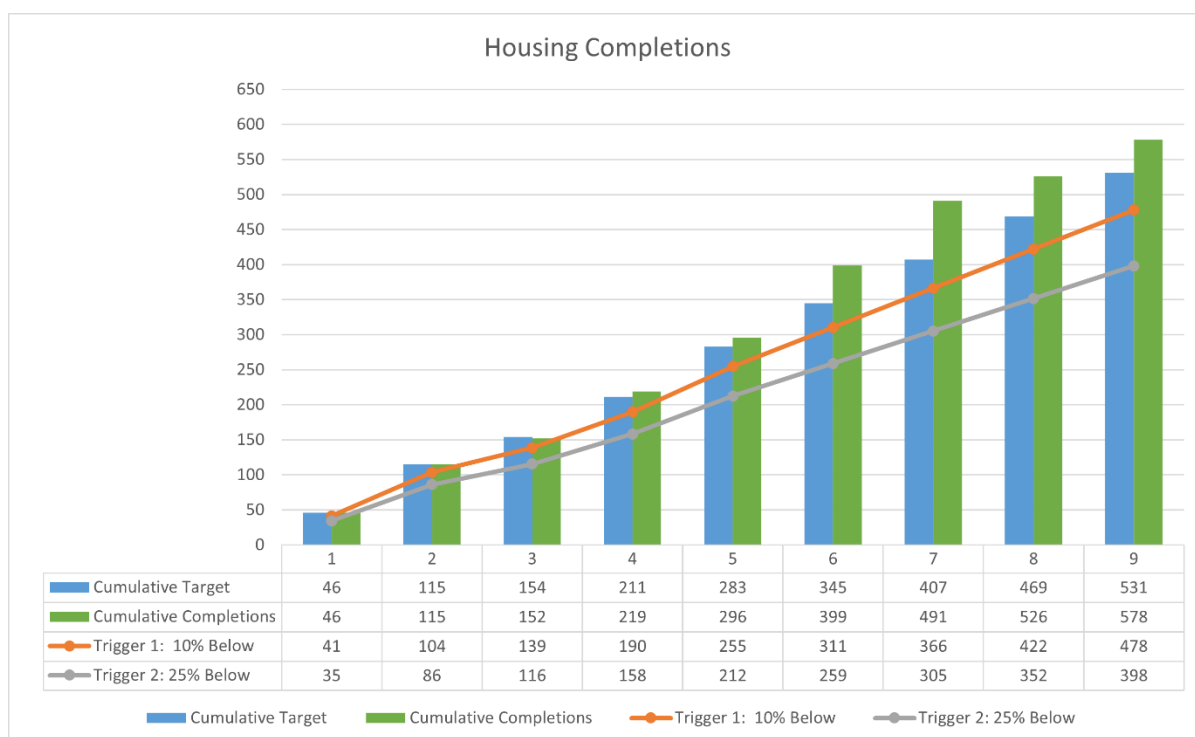
Completions 25% less than targets – determine actions to increase supply of housing to deliver affordable housing, including consideration of additional housing allocations and a review of Centre boundaries.

3.37 Housing completion rates overall are above the cumulative target at this point – March 2024. Formal review stage will allow for a conclusion to be reached regarding whether either Trigger has been reached and what the next steps might be. Sites are also mapped on our website.¹⁶

| | 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 |  |

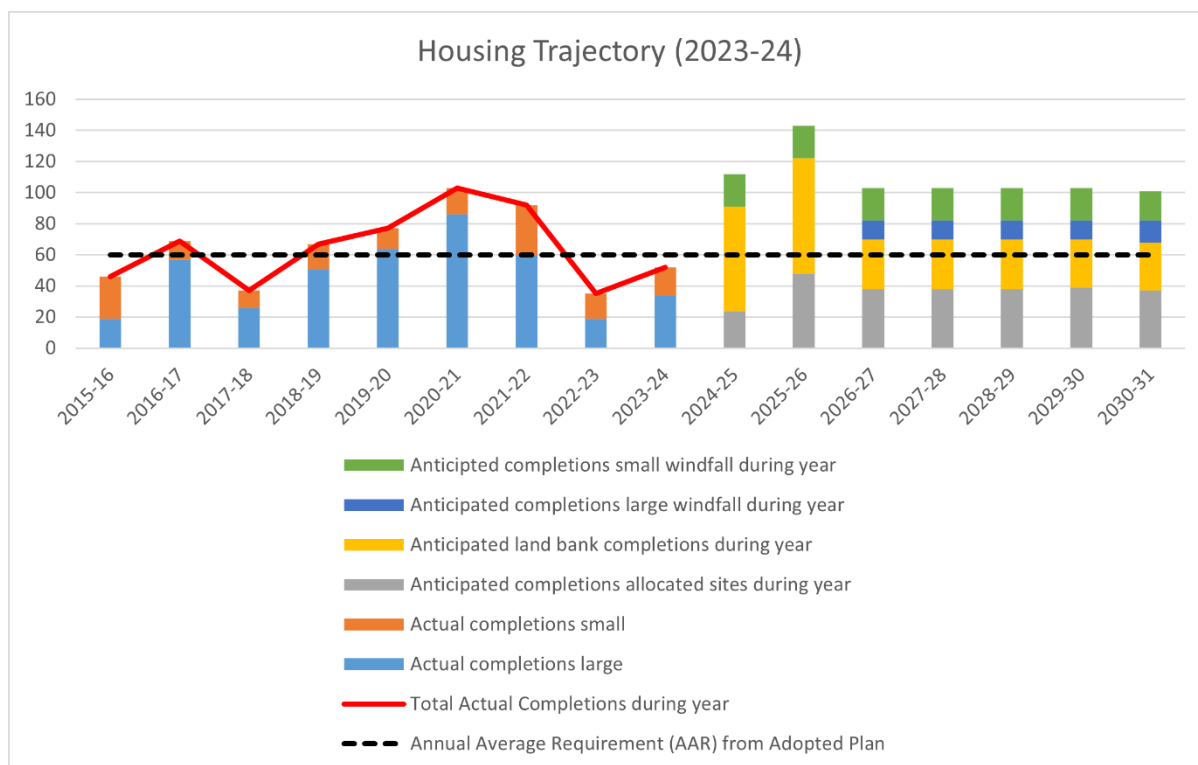
¹⁵ Please note that the reference to 960 dwellings completed during the Plan Period includes a target of 362 affordable units – See Policy 46 Housing (Strategy Policy).

¹⁶ [Local Development Plan Annual Monitoring \(arcgis.com\)](https://arcgis.com)












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

3.39 The housing requirement for the Pembrokeshire Coast National Park Local Development Plan 2 is 960 units and is illustrated on an annual basis as a black dotted line in the graph below, an expectation of delivering 60 units per annum. There have been slightly fewer completions than anticipated in the period 2023-2024, but all of those anticipated for completion are under construction and cumulative completions are above the cumulative target.



Actual and Forecasted Annual Housing Completions compared against the AAR

| LDP Year | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 |
|--|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|
| | 2015-16 | 2016-17 | 2017-18 | 2018-19 | 2019-20 | 2020-21 | 2021-22 | 2022-23 | 2023-24 | 2024-25 | 2025-26 | 2026-27 | 2027-28 | 2028-29 | 2029-30 | 2030-31 |
| Actual completions large | 19 | 57 | 26 | 51 | 64 | 86 | 60 | 19 | 34 | | | | | | | |
| Actual completions small | 27 | 12 | 11 | 16 | 13 | 17 | 32 | 16 | 18 | | | | | | | |
| Anticipated completions allocated sites during year | | | | | | | | | | 24 | 48 | 38 | 38 | 38 | 39 | 37 |
| Anticipated land bank completions during year | | | | | | | | | | 67 | 74 | 32 | 32 | 32 | 31 | 31 |
| Anticipated completions large windfall during year | | | | | | | | | | 0 | 0 | 12 | 12 | 12 | 12 | 14 |
| Anticipated completions small windfall during year | | | | | | | | | | 21 | 21 | 21 | 21 | 21 | 21 | 19 |
| Total Actual Completions during year | 46 | 69 | 37 | 67 | 77 | 103 | 92 | 35 | 52 | | | | | | | |
| Anticipated Annual Build Rate (AABR) from Adopted Plan | | | | | | | | | | 112 | 143 | 103 | 103 | 103 | 103 | 101 |
| Annual Average Requirement (AAR) from Adopted Plan | 60 | 60 | 60 | 60 | 60 | 60 | 60 | 60 | 60 | 60 | 60 | 60 | 60 | 60 | 60 | 60 |

| | Annual Target AAR | Actual Annual Completions | Plus/Minus Units | Plus/Minus % | Cumulative Target (AAR) | Cumulative Completions | Plus/Minus | Plus/Minus % | Action | Overview |
|------------|-------------------|---------------------------|------------------|--------------|-------------------------|------------------------|------------|--------------|---------------------|---|
| 2015-2016 | 60 | 46 | -14 | -23% | 60 | 46 | -14 | -23% | Continue Monitoring |  |
| 2016-2017 | 60 | 69 | 9 | 15% | 120 | 115 | -5 | -4% | Continue Monitoring |  |
| 2017-2018 | 60 | 37 | -23 | -38% | 180 | 152 | -28 | -16% | Continue Monitoring |  |
| 2018 -2019 | 60 | 67 | 7 | 12% | 240 | 219 | -21 | -9% | Continue Monitoring |  |
| 2019-2020 | 60 | 77 | 17 | 28% | 300 | 296 | -4 | -1% | Continue Monitoring |  |
| 2020-2021 | 60 | 103 | 43 | 72% | 360 | 399 | 39 | 11% | Continue Monitoring |  |
| 2021-2022 | 60 | 92 | 32 | 53% | 420 | 491 | 71 | 17% | Continue Monitoring |  |
| 2022-2023 | 60 | 35 | -25 | -42% | 480 | 526 | 46 | 10% | Continue Monitoring |  |
| 2023-2024 | 60 | 52 | -8 | -13% | 540 | 578 | 38 | 7% | Continue Monitoring |  |

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

Indicator 25

Policy 47, Policy 48 House Prices, Build costs, Affordable rents

Target: Targets for affordable housing delivery for each local market housing area are maintained



The following key indicators will be monitored:

- A) House prices – data which includes second hand as well as new properties and provides a robust indicator of price trends.
- B) Build costs – Pembrokeshire benchmark build costs and relevant BCIS index; and,
- C) Affordable rents – Local Housing Allowance data.


Trigger: The Authority will consider if there is a 10% change (plus or minus) in any one indicator sustained over a 12 month period or if

- A) There is a plus or minus change of between 5-9% in any two indicators sustained over a 12 month period; or,
- B) There is less than 10% change in indicator(s) but change is being sustained or if evidence indicates that sustained change has occurred in other development costs e.g. finance costs, developer return required.




The Authority will consider if changes are needed and whether this would require a selective review in advance of the 4-yearly formal requirement

| Year | Trigger | Target | Performance | Action | Analysis | Overview |
|------------------|--|---|---|---------------------|---|---|
| 2021-2022 | (1) 10% change plus or minus. (2) Or 5-9% change in 2 indicators (3) Or less than 10% but change is sustained. | Targets for affordable housing deliver for each local market housing area are maintained. | Build Cost Information Service shows an increase in cost of 9.4%. August 2021 to 2022 for Pembrokeshire <u>Dyfed</u> . ¹⁷ House prices Principality Building Society report July 2022 shows circa 9.9% increase in the year for Pembrokeshire. Nationwide and the Halifax house price change reports show higher increases (circa 13/14%). | Continue Monitoring | Performance remains below the Trigger point 1. Performance has reached Trigger point 2. The increase in build costs are less than the higher house prices achieved. This would indicate that the affordable housing requirements in each local market housing area can be maintained. |  |
| 2022-2023 | (1) 10% change plus or minus. (2) Or 5-9% change in 2 indicators (3) Or less than 10% but change is sustained. | Targets for affordable housing deliver for each local market housing area are maintained. | Build Cost Information Service shows that tender prices in 1Q 2023 rose by 8.6% on an annual basis taken from the same time last year (Dyfed data). House prices at a national level (Wales) and at a Pembrokeshire level show a range of change. Given the likely house price differences between the National Park and other areas in Wales and Pembrokeshire the Authority | Continue Monitoring | Performance is now above Trigger point 1 and also Trigger point 2. However, the increase in build costs is less than the higher house prices. This would indicate that that the affordable housing requirements in each local market housing area can be maintained. |  |




¹⁷ Geography for this data is Dyfed and not Pembrokeshire – error in 2021-22 Report

| Year | Trigger | Target | Performance | Action | Analysis | Overview |
|------------------|--|---|---|--------|--|---|
| | | | has also carried out a refined analysis of post codes which include the National Park. The percentage change using mean calculation = +15.23% and median change = +11.11%. | | | |
| 2023-2024 | (1) 10% change plus or minus. (2) Or 5-9% change in 2 indicators (3) Or less than 10% but change is sustained. | Targets for affordable housing deliver for each local market housing area are maintained. | Build Cost Information Service shows that tender prices in 1Q 2024 dropped to 2.9% from 8.6% in 1Q 2023. House prices at a National Level (Wales) and at a Pembrokeshire level show a range of change with the UK House Price Index showing a 0.8% increase in Pembrokeshire. Principality Building Society, however, report a 3% decrease in house prices, with prices falling around 6% for Wales as a whole. | | Performance is below all Trigger points. This would indicate that the affordable housing requirements in each local market housing area can be maintained. |  |




Indicator 26**Policy 53 Gypsy and traveller and show people sites****Target: Authority decisions are consistent with policy****Trigger: 1 or more applications are approved contrary to recommendation**

| Year | Trigger | Target | Performance | Action | Analysis | Overview |
|------------|---------|--------|-------------|---------------------|--|---|
| 2021- 2022 | 1 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |
| 2022-2023 | 1 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |
| 2023-2024 | 1 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |




Indicator 27**Policy 57 Housing Density****Target: 30 per hectare target in the Plan's Centres achieved****TRIGGER: 2 or more housing developments not achieving 30 dwellings to the hectare unless an alternative density is justified under Policy 51**

| Year | Trigger | Target | Performance | Action | Analysis | Overview |
|------------|---------|--------|-------------|---------------------|--|---|
| 2021- 2022 | 2 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |
| 2022-2023 | 2 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |
| 2023-2024 | 2 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |

Indicator 28**Policy 52 mix of housing****Target: Decisions consistent with policy****Trigger: 2 or more housing developments approved contrary to Policy 52**

| Year | Trigger | Target | Performance | Action | Analysis | Overview |
|------------|---------|--------|-------------|---------------------|--|---|
| 2021- 2022 | 2 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |
| 2022-2023 | 2 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |
| 2023-2024 | 2 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |

Indicator 29**Policy 2 to Policy 7 Plan's centres****Target: 90% of housing completions are focused in the Plan's Centres****Trigger: 20 % of completions are in the Countryside by the formal Plan review period. Undertake research to establish reasons and dependent on findings consider whether actions are necessary to the spatial strategy**










| Year | Trigger | Target | Performance | Action | Analysis | Overview |
|------------|---------------------------------------|--|---|---------------------|--|---|
| 2021- 2022 | 20% of completions in the Countryside | 90% of completions are in Plan's Centres | Just under 20% | Continue Monitoring | Performance remains below the Trigger point. |  |
| 2022- 2023 | 20% of completions in the Countryside | 90% of completions are in Plan's Centres | Just under 69% of completions were in the Countryside ¹⁸ | Continue Monitoring | Performance remains below the Trigger point. |  |
| 2023- 2024 | 20% of completions in the Countryside | 90% of completions are in Plan's Centres | Just under 14% of completions in the countryside | Continue Monitoring | Performance remains below the Trigger point. |  |

¹⁸ This represents 22 dwellings of which 17 were completions on an Affordable Housing Exception Site (Policy 49) 1 completion constituted legacy rounding off granted under Local Development Plan 1, and a further 2 constituted conversion of appropriate buildings in the countryside (Policy 7)

Indicator 30**Policy 52 Tenure of Affordable Housing**

Target: 80% of affordable houses permitted are affordable rented properties

Trigger: An annual review of all planning permissions granted in that year show that the affordable housing element includes less than 75% affordable rented properties. Undertake research to establish reasons and dependent on findings consider whether actions are necessary to increase supply.

| YEAR | AFFORDABLE COMPLETIONS | RENTED | % OF TOTAL RENTED | ACTION | OVERVIEW |
|---------|------------------------|--------|-------------------|---------------------|---|
| 2015/16 | 1 | 1 | 100 | Continue Monitoring |  |
| 2016/17 | 46 | 46 | 100 | Continue Monitoring |  |
| 2017/18 | 3 | 3 | 100 | Continue Monitoring |  |
| 2018/19 | 14 | 14 | 100 | Continue Monitoring |  |
| 2019/20 | 25 | 25 | 100 | Continue Monitoring |  |
| 2020/21 | 39 | 39 | 100 | Continue Monitoring |  |
| 2021/22 | 38 | 38 | 100 | Continue Monitoring |  |
| 2022/23 | 17 | 17 | 100 | Continue Monitoring |  |
| 2023/24 | 27 | 23 | 85 | Continue Monitoring |  |

The 2023-24 includes four completions that were granted permission as Rural Enterprise Dwellings. In accordance with Planning Policy Wales (Edition 12, February 2024) paragraph 4.2.38, rural enterprise dwellings should also be classified as affordable housing as defined in TAN 2: Planning and Affordable Housing, to ensure that the dwelling remains available to meet local affordable housing need should the original justification cease to exist.

2F Community facilities, retailing and transport

Key outcomes

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

Context

3.41 **Retailing:** Covid-19 had a significant impact on retailing and town centres, and this is still having an impact 4 years on. To breathe new life into town centres, the Welsh Government has adopted a 'Town Centre First' approach in Future Wales 2040. In addition, the newly established Retail Forum launched a Retail Strategy in June 2022¹⁹ and 'Together for Retail': a Wales retail Forum action plan in May 2023²⁰. Welsh High Street vacancy rates were 16.6% in quarter 3 of 2023, a slight reduction from 16.7% in quarter 2. The vacancy rate in Wales is the second highest of any nation or region of Great Britain²¹ These vacancy rates are not reflected in the National Park's Retail Centres, most of which have vacancy rates well below 10%. See Indicator 34 below.

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




Policy Performance

Indicator 31

Policy 54 Community Facilities & Infrastructure Requirements

Target: Authority decisions are consistent with Policy

Trigger: Approval of 1 or more planning applications contrary to Policy 54 in any one year




| Year | Trigger | Target | Performance | Action | Analysis | Overview |
|------------|---------|--------|-------------|---------------------|--|---|
| 2021- 2022 | 1 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |
| 2022-2023 | 1 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |
| 2023-2024 | 1 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |

¹⁹ [A shared strategic vision for the retail sector | GOV.WALES](#)




²⁰ [Retail action plan | GOV.WALES](#)

²¹ Welsh Retail Consortium figures.




Indicator 32**Policy 55 Planning Obligations****Target: S106 Agreements secured in line with guidance****Trigger: Approval of 2 or more planning applications contrary to recommendation**

| Year | Trigger | Target | Performance | Action | Analysis | Overview |
|------------|---------|--------|-------------|---------------------|--|---|
| 2021- 2022 | 2 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |
| 2022-2023 | 2 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |
| 2023-2024 | 2 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |

Indicator 33**Policy 56, 57 Retail Hierarchy****Target: Authority decisions are consistent with policy****Trigger: 1 or more developments approved contrary to recommendation in any one year for either Policy 56 or Policy 57**

| Year | Trigger | Target | Performance | Action | Analysis | Overview |
|------------|---------|--------|-------------|---------------------|--|---|
| 2021- 2022 | 1 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |
| 2022-2023 | 1 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |
| 2023-2024 | 1 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |




Indicator 34**Policy 56 Vacant Retail Floor Space****Target: No greater than 10%****Trigger: Greater than 10% vacant A use class floor space within retail centres for 2 consecutive years**

| Year | Trigger | Target | Performance | Action | Analysis | Overview |
|------------------|--|---------------|----------------------------------|---------------------|--|---|
| 2021-2022 | Greater than 10% for 2 consecutive years | Less than 10% | Overall vacant floorspace = 5.7% | Continue Monitoring | Performance remains below the Trigger point. |  |
| 2022-2023 | Greater than 10% for 2 consecutive years | Less than 10% | Overall vacant floorspace = 7.8% | Continue Monitoring | Performance remains below the Trigger point. |  |
| 2023-2024 | Greater than 10% for 2 consecutive years | Less than 10% | Overall vacant floorspace = 8.2% | Continue Monitoring | Performance remains below the Trigger point. |  |

Vacant A Use Class Floor Space in National Park Retail Centres

| YEAR | OVERALL | TENBY | ST DAVIDS | NEWPORT | SAUNDERSFOOT |
|--------------------|-------------|--------------|-------------|-----------|--------------|
| 2021-2022 | 5.7% | 8.7% | 3.2% | 0% | 0.7% |
| 2022 - 2023 | 7.8% | 13% | 3.2% | 0% | 2.4% |
| 2023-2024 | 8.2% | 12.7% | 7% | 0% | 1.5% |

Indicator 35**Policy 59 Transport****Target: 0 Applications contrary to recommendation****Trigger: 1 or more applications approved contrary to recommendation**

| Year | Trigger | Target | Performance | Action | Analysis | Overview |
|-------------------|---------|--------|-------------|---------------------|--|---|
| 2021- 2022 | 1 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |
| 2022-2023 | 1 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |
| 2023-2024 | 1 | 0 | 0 | Continue Monitoring | Performance remains below the Trigger point. |  |






Supplementary Planning Guidance







Indicator 37

Key Supplementary Planning Guidance

Target: To adopt Key Supplementary Planning Guidance within 1 year of the Plan's adoption (Sept 21) = 6 Guidance documents (* in the table below).

















Trigger: 1 or more guidance documents not adopted

| Status | Count | March 2024 |
|-------------------------|------------------|--|
| Adopted | 27 ²² |  |
| Consultation | 0 |  |
| Being drafted/redrafted | 3 |  |
| Interim/rolled over | 3 |  |
| Later/Stalled | 3 |  |

| Title | Current Status – Annual Monitoring Report 2022 | Status |
|----------------------------------|---|---|
| Affordable Housing | Interim Supplementary Planning Guidance Local Development Plan 2 – September 2020 (with PCC) Preparing joint with PCC for LDP2 alongside an Affordable Housing Strategy for Pembrokeshire. |  |
| Archaeology | Adopted May 2021 (with PCC) |  |
| Biodiversity | Adopted May 2021 (with PCC) |  |
| Caravan, Camping and Chalet | Adopted May 2021 |  |
| Coal Works – Instability | Adopted Oct 2022 |  |
| Conservation Areas ²³ | Adopted October 2022 |  |

²² Includes 13 Conservation Area documents

²³ Angle, Caerfarchell, Caldey Island, Little Haven, Manorbier, Newport and Newport Parrog, Portclew, Porthgain, Saundersfoot, Solva, St David's Trefin, Tenby.

| Title | Current Status – Annual Monitoring Report 2022 | Status |
|--|--|---|
| Landscape | Adopted June 2011 Interim Supplementary Planning Guidance Local Development Plan 2 – September 2020 Implementing Interim Guidance until LANDMAP updates received. |  |
| Lighting | New - Research undertaken will inform drafting of the Guidance. |  |
| Loss of Community Facilities | New - clarification needed as to the role of the Guidance. |  |
| Loss of Hotels | Adopted September 2023 |  |
| Parking | Adopted May 2021 |  |
| Planning Obligations | Interim Supplementary Planning Guidance Local Development Plan 2 – September 2020 (with PCC) Review will be led by Pembrokeshire County Council |  |
| Recreation | Very little management of damaging activities can be achieved through land use planning. The potential role of supplementary planning guidance will continue to be explored. |  |
| Regionally Important Geodiversity Sites | Adopted October 2022 |  |
| Renewable Energy | Adopted May 2021 |  |
| Safeguarding Mineral Zones | Adopted October 2022 |  |
| Seascape Character | Adopted September 2023 |  |
| Shopfront Design | |  |
| Sustainable Design & Development²⁴ | Adopted May 2021 |  |
| The Cumulative Impact of Wind Turbines | Adopted October 2022 |  |
| Place Plans:– Community Land Trust | Adopted May 2021 |  |
| Tree and Woodland Guidance | Adopted September 2023 |  |

²⁴ Amalgamates Siting and Design of Farm Buildings and Sustainable Design

Effectiveness of policy and guidance at appeal

3.43 In the period April 2023 to March 2024 there were seven appeal decisions against refusals for planning permission. All appeals were dismissed. One appeal was decided by the Welsh Minister and was dismissed prior to this monitoring period but the Authority received the decision notice within this monitoring period and therefore is recorded here.

| Application Details | Reasons for Refusal | Appeal Decision ²⁵ |
|---|--|--|
| NP/20/0614/FUL-6 affordable houses in association with 6 woodworking workshops, a community facility and a timber processing and drying facility | <p>Committee Refusal:</p> <p>The proposal was considered to have a harmful impact on the special qualities of the National Park and contrary to national and local planning policies and the principles of PPW. Insufficient information was supplied regarding the impact of the River Cleddau SAC and the dwellings proposed with insufficient amenity space away from industrial production areas.</p> <p>Proposal considered contrary to Policies 7 (Countryside), 8 (Special Qualities), 9 (Light Pollution), 10 (Local Sites of Nature Conservation or Geological Interest) 14 (Conservation of the Pembrokeshire Coast National Park) and 30 (Amenity).</p> | <p>APP/L9503/A/21/3282653 Dismissed 14/03/2023</p> <p>Inspector concluded that the development did not comprise any of the acceptable forms of development defined in Policy 7, would have an adverse impact on the landscape character and special qualities and therefore contrary to Policies 8 and 14 and that the affordable housing element could not be secured by condition. It was also concluded that it was not possible to conclude that the development would have no adverse effect on the integrity of the SAC.</p> <p>The Welsh Minister agreed with the Inspector's reasonings and conclusions.</p> |

NP/20/0614/FUL: The dismissal of the appeal citing Policies 7,8 and 14 shows these policies are performing effectively.

²⁵ [Search for a case - Planning Casework \(gov.wales\)](https://www.gov.wales/planning/casework)

| Application Details | Reasons for Refusal | Appeal Decision |
|---|--|--|
| NP/22/0357/FUL – Retrospective summerhouse space used as part of enjoyment of house and domestic wildlife garden | <p>Committee Refusal:</p> <p>The proposal was considered to fall outside the curtilage of the dwelling and within the countryside and therefore considered contrary to Policy 7 (Countryside) by having a detrimental impact on the character and appearance of the Countryside and the visual amenity of the National Park.</p> | <p>CAS-02506-Y1Z4X2 Dismissed 12/04/2023</p> <p>Inspector concluded that the proposal failed to comply with planning policies relating to the countryside (Policy 7) by appearing obtrusive in the landscape and having a detrimental impact on the character and appearance on the special qualities of the National Park (Policy 8).</p> |

NP/22/0357/FUL: The dismissal of the appeal citing Policies 7 and 8 show these policies are performing effectively.

| Application Details | Reasons for Refusal | Appeal Decision |
|---|---|--|
| NP/22/0007/FUL: Proposed garage adjacent to driveway | <p>Delegated Refusal:</p> <p>The proposal was not considered to be well designed in terms of place, scale and design and would be insensitively and unsympathetically sited within the landscape and would cause an unacceptable adverse impact on the amenity of neighbouring properties.</p> <p>Proposal considered contrary to Policies 2 (Tenby Service and Tourism Centre), 8 (Special Qualities), 14 (Conservation of the Pembrokeshire Coast National Park), 29 (Sustainable Design) and 30 (Amenity).</p> | <p>CAS-02386-K4D6Y1 Dismissed 11/05/23</p> <p>The Inspector concluded that the proposal would not represent good design and would have a harmful effect on the character and appearance of its surroundings in conflict with Policies 8 and 14 which seek to ensure the character and identity of the landscape of the National Park is not lost through poor design, Policy 29 which requires development proposals to be well designed in terms of place and local distinctiveness and Policy 30 which states that development should not be visually intrusive on its surroundings. It would also be at odds with national planning policy in respect of these matters.</p> |

NP/22/0007/FUL: The dismissal of the appeal citing Policies 8, 14, 29 and 30 show these policies are performing effectively.

| Application Details | Reasons for Refusal | Appeal Decision |
|--|---|--|
| NP/21/0381/FUL: Proposed change of use and conversion of vacant ground floor shop to a 2 bedroom flat | <p>Delegated Refusal:</p> <p>The proposal was considered to be contrary to Policy 57 (Town and District Shopping Centres) as the change from A1 to C3 use would result in the loss of a retail unit. C3 uses are precluded from the retail centre. No evidence was submitted by the applicant to demonstrate the retail use of the ground floor was no longer viable.</p> | <p>CAS-02434-VOW5G4 Dismissed 02/08/23</p> <p>The Inspector concluded that the applicant had not demonstrated a robust or sufficiently sustained marketing of the property as a commercial premises and the loss of the retail unit would be harmful to the vitality, viability and diversity of the town centre and its retail function. It would therefore conflict with Policy 57.</p> |

NP/21/0381/FUL: The dismissal of the appeal citing Policy 57 show this policy is performing effectively.

| Application Details | Reasons for Refusal | Appeal Decision |
|---|---|--|
| NP/21/0191/FUL: Proposed replacement dwelling and associated works | <p>Delegated Refusal:</p> <p>The proposal was not considered to be of an appropriate design in terms of its design, scale and massing and would cause harm to the special qualities of the National Park.</p> <p>Proposal considered contrary to Policies, 8 (Special Qualities), 14 (Conservation of the Pembrokeshire Coast National Park), 29 (Sustainable Design) and 30 (Amenity).</p> | <p>CAS-02223-V9Q1P8 Dismissed 10/08/23</p> <p>The Inspector concluded that the proposal would be harmful to the character and appearance of the area and would harm the special qualities of the National Park. As such the proposal would conflict with Policies 8, 14 and 29. It would also conflict with Policy 30 which does not permit development if it is of a scale incompatible with its surroundings. The proposal also fails to comply with national planning policy advice in PPW and TAN 12.</p> |

NP/21/0191/FUL: The dismissal of the appeal citing Policies 8, 14, 29 and 30 show these policies are performing effectively.

| Application Details | Reasons for Refusal | Appeal Decision |
|--|---|--|
| <p>NP/22/0693/FUL: New 4-bedroom dwelling with garage and vehicle access/driveway</p> | <p>Delegated Refusal:</p> <p>The proposal was not considered to be in accordance with Policy 6 (Rural Centres) as the size of the proposed dwelling was inconsistent with the size and character of the Rural Centre and no unilateral undertaking to secure the provision of affordable housing.</p> <p>The proposal was also considered to be contrary to Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), (Light Pollution), 11 (Nationally Protected Sites and Species) 14 (Conservation and enhancement of the Pembrokeshire Coast National Park), 29 (Sustainable Design), 30 (Amenity), 32 (Surface Water Drainage), 48 (Affordable Housing), 59 (Sustainable Transport) and 60 (Impacts of Traffic)</p> | <p>CAS-02681-V8M9N2 Dismissed 14/11/23</p> <p>The Inspector concluded that the proposal would have a detrimental impact on the character and appearance of the area and on the special qualities of the National Park and would therefore conflict with Policies 1, 6, 8, 14, 29 and 30.</p> <p>The Inspector also determined that the Ecology Survey Report was out of date and therefore there was insufficient evidence available to establish the potential impact of the proposal on biodiversity and ecology.</p> |

NP/22/0693/FUL: The dismissal of the appeal citing Policies 1, 6, 8, 14, 29 and 30 show these policies are performing effectively.

| Application Details | Reasons for Refusal | Appeal Decision |
|--|--|---|
| <p>NP/22/0503/FUL: The installation of a 51 metre high telecommunications tower supporting 9 no. transmission dishes and 6 no. mobile coverage antennas, an equipment cabin and 2 no. equipment cabinets at ground level, a chainlink fence and development ancillary thereto</p> | <p>Delegated Refusal: The proposal was considered to have an unacceptably adverse impact on the visual amenities and landscape character of the National Park and would be contrary to Policies 7 (Countryside), 8 (Special Qualities), 14 (Conservation and enhancement of the Pembrokeshire Coast National Park), 29 (Sustainable Design) and 63 (Telecommunications)</p> | <p>CAS-02677-B8Z0V7 Dismissed 21/11/23</p> <p>The Inspector concluded that proposed development would cause serious harm to the landscape of the National Park and would conflict with Policies 8, 14, 29 and 63, noting that the appellant had stated that apart from being in the National Park, there are no specific designations affecting the site. The Inspector stated that National Parks enjoy the highest level of landscape protection and the area around the site needs no other designation in this regard.</p> |

NP/22/0503/FUL: The dismissal of the appeal citing Policies 8, 14, 29 and 63 show these policies are performing effectively.

4. Sustainability Appraisal Monitoring

Sustainability Objective Progress

Sustainability Objective 1

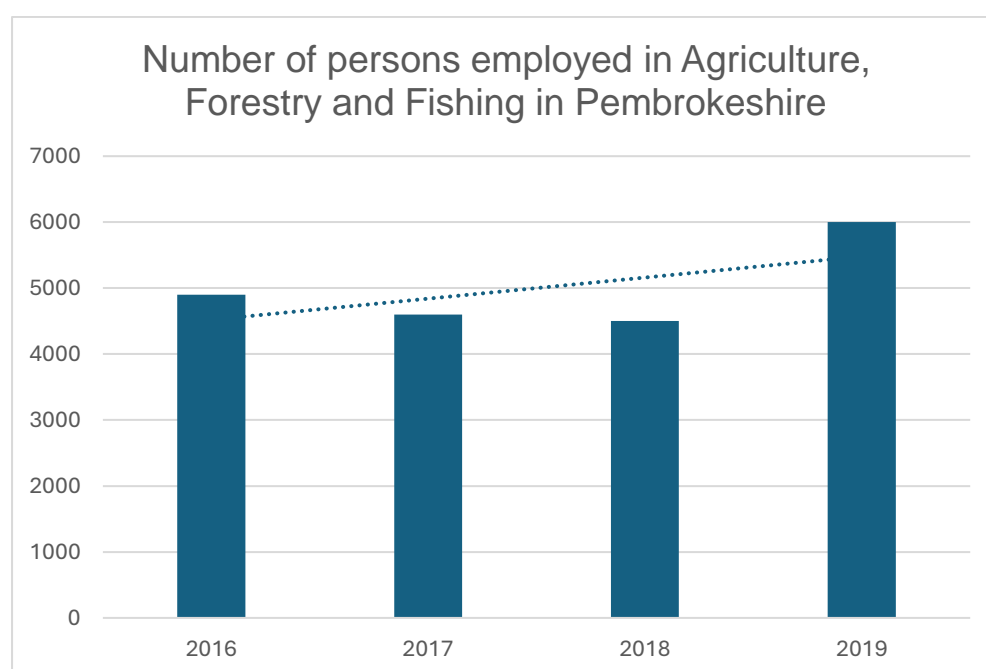
Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well-being.

Commentary:

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

The dataset used here has now been discontinued, an alternative data source and/or alterations to this SA Objective will be investigated for LDP Review from September 2024.

| Year | Action | Analysis | Overview |
|-------------|---------------------|--|----------|
| 2021 – 2022 | Continue Monitoring | Further data is required to make conclusions – latest data included. | - |
| 2022 – 2023 | Continue Monitoring | Further data is required to make conclusions – latest data included. | - |
| 2023 – 2024 | Continue Monitoring | An alternative indicator is required for this objective. | - |



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

Sustainability Objective 2

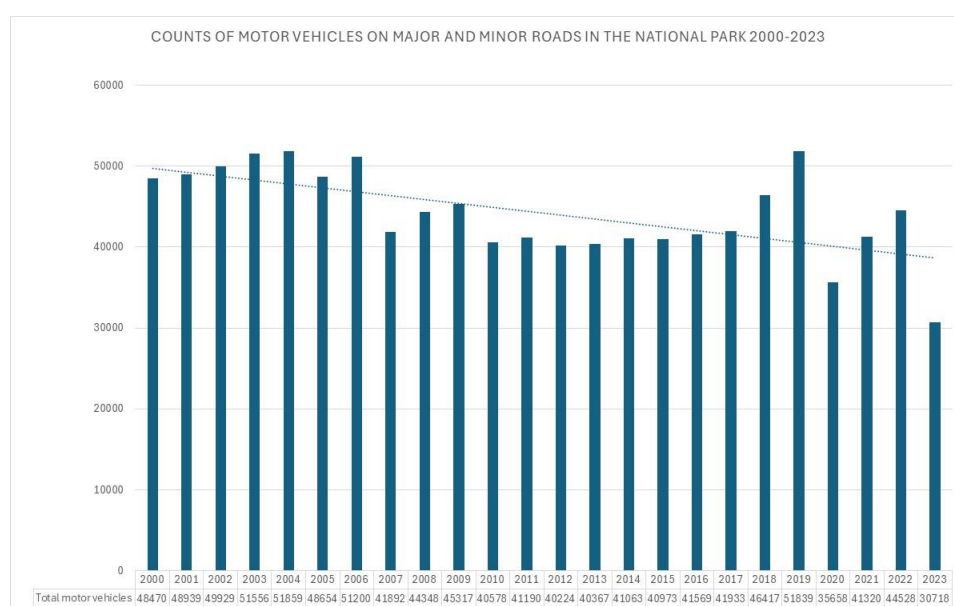
Locate developments so as to minimise the demand for travel, especially by private car

Commentary:

Traffic counts from the Department for Transport (2000 – 2023) for survey locations within the National Park show that between 2010 and 2017, traffic levels remained much the same. 2018 – 2019 figures were the highest on record, with a dramatic drop in the traffic count in 2020, likely due to the COVID 19 pandemic. In 2021 and 2022 traffic counts increased again, then the 2023 counts show the lowest on record. The reason for this is unknown but it may indicate lower levels of visitors. Contributions to this objective by the Local Development Plan arise, largely, through the maintenance or improvement of community facilities, and by restricting development in areas where there are low levels of community infrastructure.

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

| Year | Action | Analysis | Overview |
|-------------|---------------------|---------------------------------|----------|
| 2021- 2022 | Continue Monitoring | Performance remains acceptable. | ● |
| 2022-2023 | Continue Monitoring | Performance remains acceptable. | ● |
| 2023 – 2024 | Continue Monitoring | Performance remains acceptable | ● |



Department for Transport Traffic Counts – Data accessed 01/07/2024

Sustainability Objective 3

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

Commentary:




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

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

Performance against Indicator 4 shows that no applications have been approved contrary to officer recommendation during this monitoring period.

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

Conclusion: Past performance against this SA Objective has been of concern, the 2022 – 2023 monitoring period in particular, where three applications were approved that were considered by officers to be contrary to Policy 8 (Special Qualities), breaching the trigger point for Indicator 4. Action was taken in the form of Member training, and during this monitoring period no contrary approvals have been made.

| Year | Action | Analysis | Overview |
|-------------|--|--|---|
| 2021- 2022 | Further investigation/Research required. | Performance here is of concern as the special qualities are core to the National Park designation. |  |
| 2022-2023 | Training Required | Performance here is of concern as the special qualities are core to the National Park designation. |  |
| 2023 – 2024 | Continue monitoring | Performance in this monitoring period is acceptable |  |




Sustainability Objective 4

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

Commentary:

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

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

| Year | Action | Analysis | Overview |
|-------------|---------------------|---------------------------------|---|
| 2021- 2022 | Continue Monitoring | Performance remains acceptable. |  |
| 2022-2023 | Continue Monitoring | Performance remains acceptable. |  |
| 2023 – 2024 | Continue Monitoring | Performance remains acceptable. |  |

Sustainability Objective 5

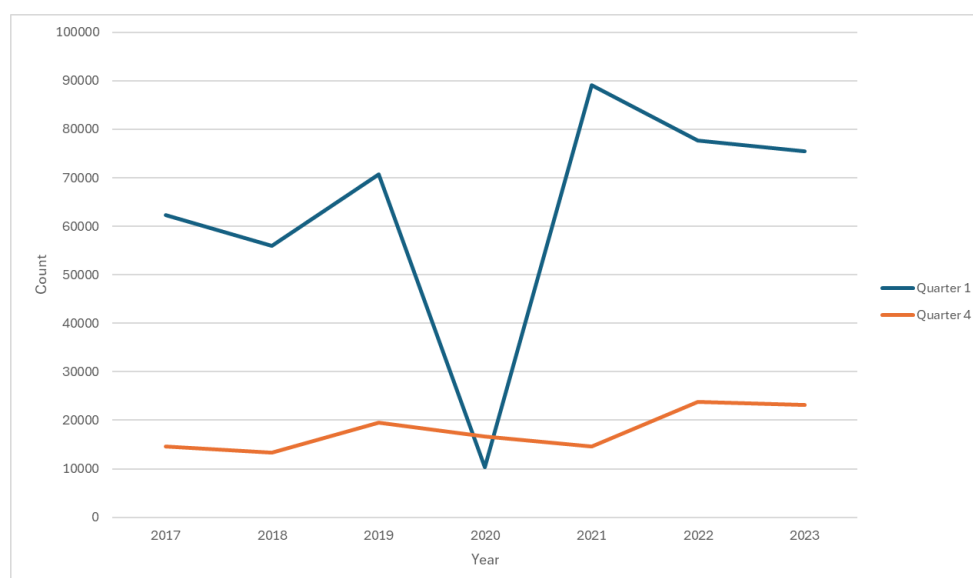
Increase the number of visitors using the National Park outside the peak visitor season.

Commentary:

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

Latest footpath counter figures for the combined footpath network out of peak season still remain higher than historic figures but have declined somewhat. Peak use (Q1) shows pronounced increases and decreases between 2019 and 2020 going into 2021, which are likely due to the COVID19 pandemic.

| Year | Action | Analysis | Overview |
|-------------|---------------------|--|----------|
| 2021 – 2022 | Continue Monitoring | Further data is required to make conclusions – latest data included. | - |
| 2022 – 2023 | Continue Monitoring | Further data is required to make conclusions – latest data included. | - |
| 2023 – 2024 | Continue Monitoring | Further data is required to make conclusions – latest data included. | - |



Footpath Counter Data




Sustainability Objective 6

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

Commentary:

The Local Development Plan will contribute towards this objective primarily by not adding to the amount of infrastructure at risk from fluvial/coastal flooding. Performance against indicator 15 (Policy 34) shows that no applications were permitted in a C2 flood zone or within zone 3 of the Flood Map for Planning during this monitoring period. In the previous two monitoring periods applications had been approved in C2 flood zones, with the trigger point of two being met in the 2022 – 2023 monitoring period. Action was taken in the form of Member training in this area. The LDP, with regard to this SA Objective, looks to be back on track for 2023 – 2024.

LDP policies 35-37 designate “Coastal Risk Management Areas” and make allowances for the relocation and replacement of homes and community facilities, helping to enable the coastal communities in the National Park adapt to the effects of climate change.

| Year | Action | Analysis | Overview |
|-------------|--|---------------------------------|---|
| 2021- 2022 | Further investigation/Research required. | Performance here is of concern. |  |
| 2022-2023 | Training Required. | Performance here is of concern. |  |
| 2023 – 2024 | Continue Monitoring | Performance here is acceptable. |  |

Sustainability Objective 7

Reduce factors contributing to climate change

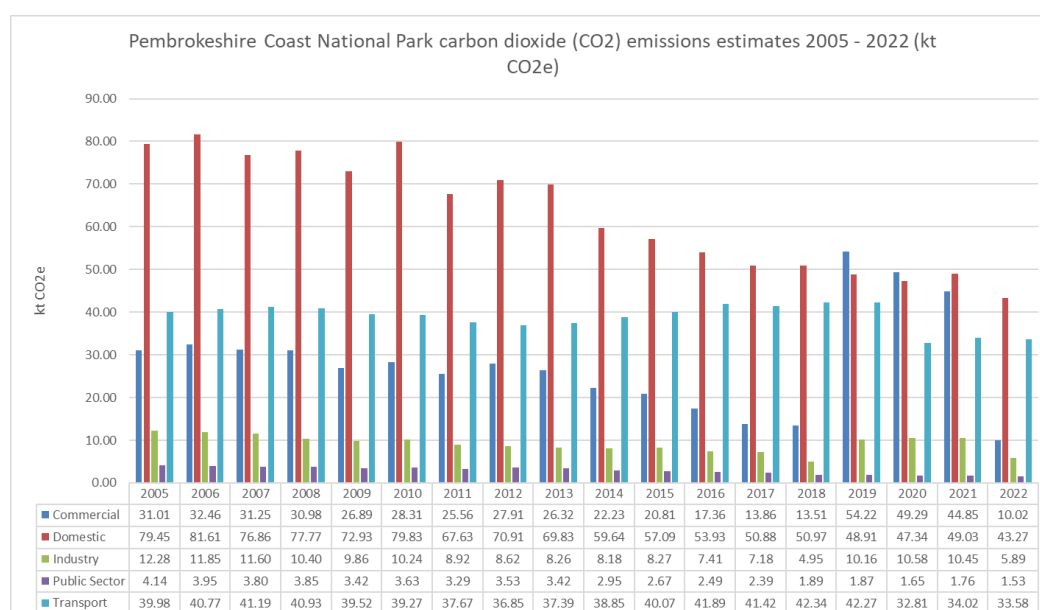
Commentary:

The most recent estimates of Carbon Dioxide emissions for National Parks by the Department for Energy Security and Net Zero show that the largest sources within the scope of influence of the Local Development Plan in the Pembrokeshire Coast National Park are, and have historically been, commercial, domestic, industry, public sector, and transport. The levels emissions across these sectors have shown a gradual decline since 2016 with the exception of transport, which has remained largely the same. Between 2019 and 2020, however, industry and commercial increased but show decline in 2022.

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

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

| Year | Action | Analysis | Overview |
|-------------|---------------------|---------------------------------|----------|
| 2021- 2022 | Continue Monitoring | Performance remains acceptable. | ● |
| 2022-2023 | Continue Monitoring | Performance remains acceptable. | ● |
| 2023 – 2024 | Continue Monitoring | Performance remains acceptable. | ● |



Emissions source: [UK local authority and regional greenhouse gas emissions statistics, 2005 to 2022 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/uk-local-authority-and-regional-greenhouse-gas-emissions-statistics-2005-to-2022)- Data accessed 03/07/2024




Sustainability Objective 8

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

Commentary:

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

Indicator 23 (Affordable Housing, Policy 52) shows good cumulative progress towards the Local Development Plan targets for affordable housing.

| Year | Action | Analysis | Overview |
|-------------|---------------------|---------------------------------|---|
| 2021- 2022 | Continue Monitoring | Performance remains acceptable. |  |
| 2022-2023 | Continue Monitoring | Performance remains acceptable. |  |
| 2023 – 2024 | Continue Monitoring | Performance remains acceptable. |  |




Sustainability Objective 9

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

Commentary:

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

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

| Year | Action | Analysis | Overview |
|-------------|---------------------|---------------------------------|---|
| 2021- 2022 | Continue Monitoring | Performance remains acceptable. |  |
| 2022-2023 | Continue Monitoring | Performance remains acceptable. |  |
| 2023 – 2024 | Continue Monitoring | Performance remains acceptable. |  |

Sustainability Objective 10

Maintain the cultural distinctiveness of communities.

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

Commentary:

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




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

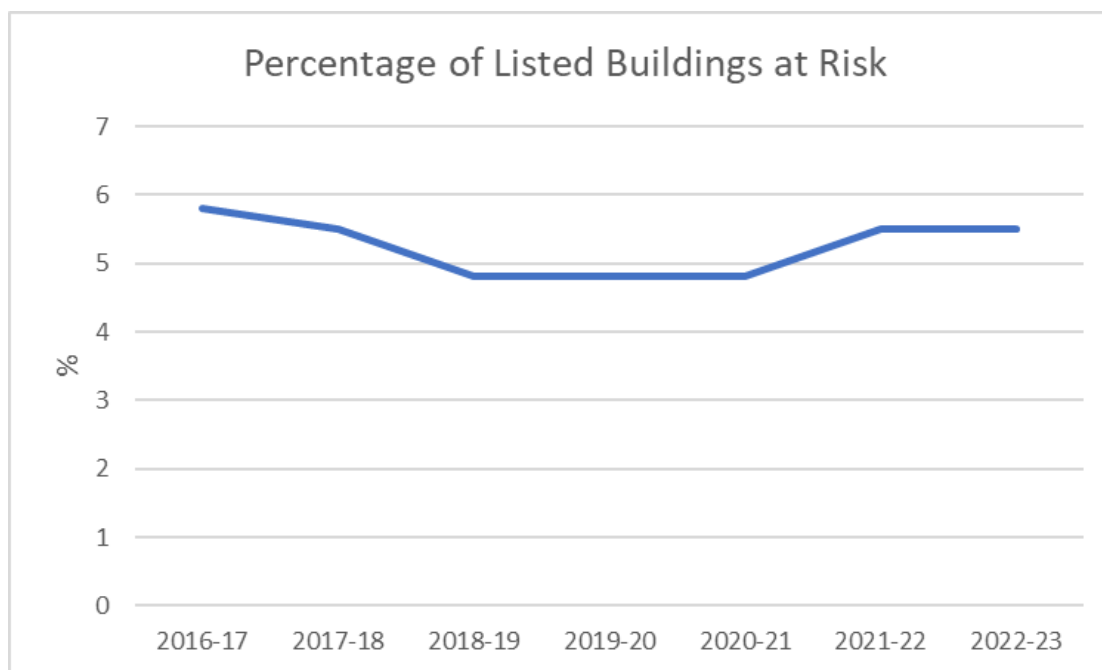
Secondly, the Local Development Plan will be able to contribute to the objective by helping to maintain and enhance culturally significant built environment and natural environment features.

Thirdly, by helping to protect the Welsh language.

In the 2022-2023 monitoring period, listed buildings less than 10% (5.5%) are identified as being at any degree of risk. Due to resourcing, the number of listed buildings at risk has not been surveyed for the 2023-2024 monitoring period. There is also potential for Listed Buildings to have a change of use/conversion. Between the 1st April 2023 and 31st March 2024 two applications for the change of use or conversion were approved.

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

| Year | Action | Analysis | Overview |
|-------------|---------------------|---------------------------------|---|
| 2021- 2022 | Continue Monitoring | Performance remains acceptable. |  |
| 2022-2023 | Continue Monitoring | Performance remains acceptable. |  |
| 2023 – 2024 | Continue Monitoring | Performance remains acceptable. |  |



Sustainability Objective 11

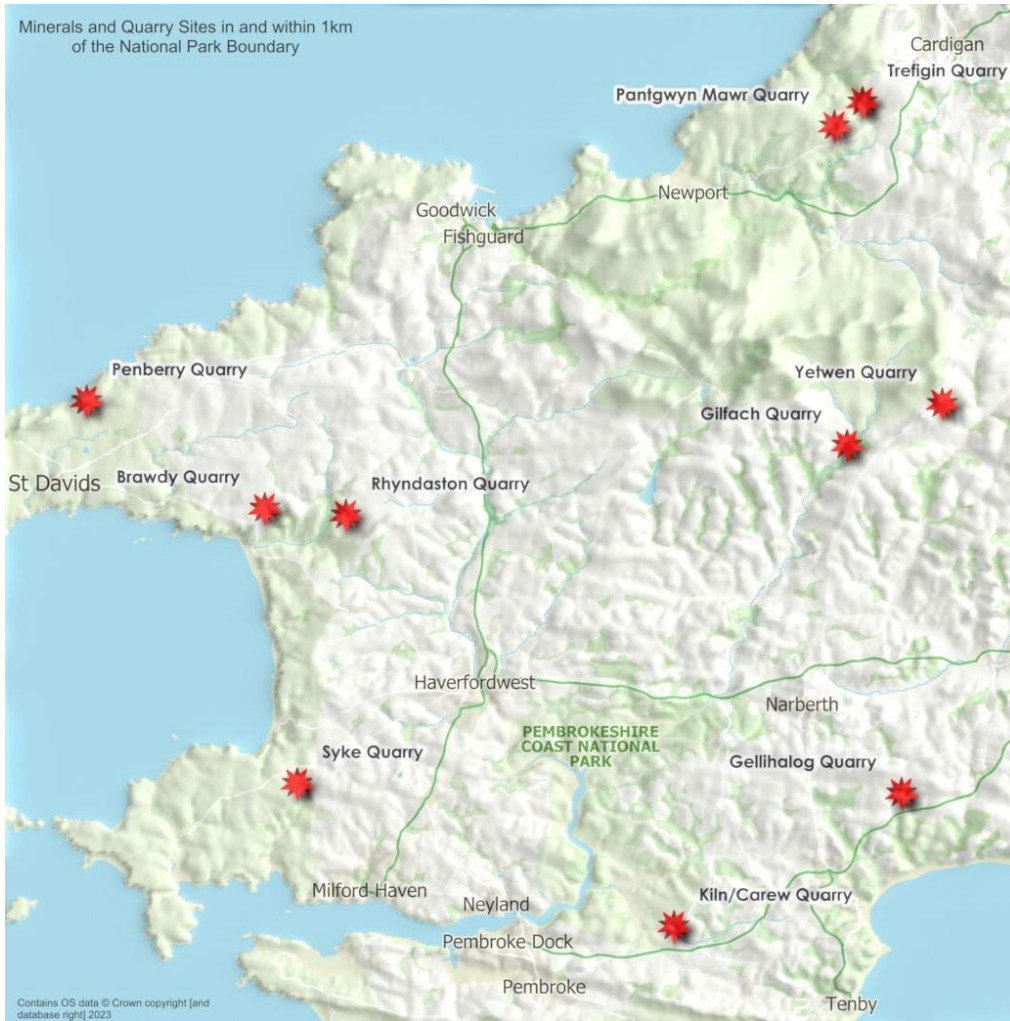
The adverse effects of minerals exploitation in the National Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.

Commentary:

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

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

| Year | Action | Analysis | Overview |
|-------------|---------------------|---------------------------------|----------|
| 2021- 2022 | Continue Monitoring | Performance remains acceptable. | ● |
| 2022-2023 | Continue Monitoring | Performance remains acceptable. | ● |
| 2023 – 2024 | Continue Monitoring | Performance remains acceptable. | ● |



Sustainability Objective 12

Reduce the negative impacts of waste.




Commentary

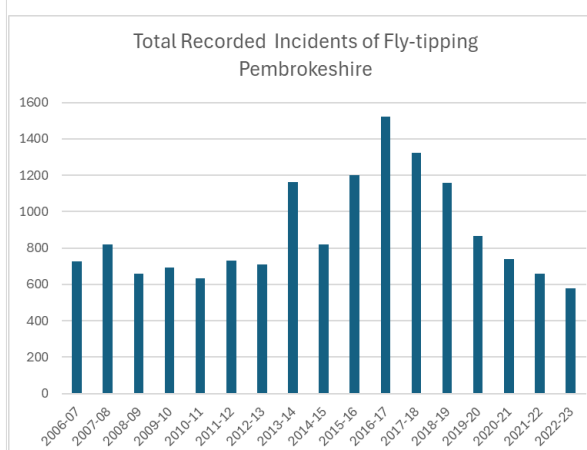
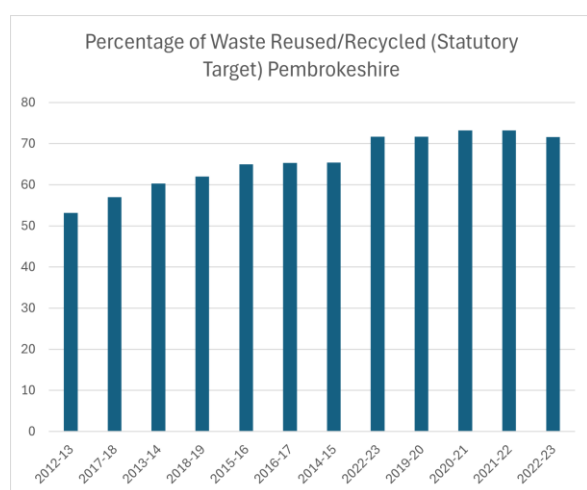
Policies 27 and 28 make allowances for waste management and composting facilities to be created that benefit communities in the national park subject to the location being appropriate. No applications contrary to these policies (see indicator 10) have been approved during this monitoring period.

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

Following the introduction of the new household recycling and waste collection service in November 2019, Pembrokeshire is now one of Wales' top recyclers, along with Swansea.

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

| Year | Action | Analysis | Overview |
|-------------|---------------------|---------------------------------|---|
| 2021 - 2022 | Continue Monitoring | Performance remains acceptable. |  |
| 2022- 2023 | Continue Monitoring | Performance remains acceptable. |  |
| 2023-2024 | Continue Monitoring | Performance remains acceptable. |  |






Annual reuse/recycling/composting rates by local authority ([Stats Wales](#)) – Data Accessed 03/07/24
Recorded fly-tipping Incidents ([Stats Wales](#)) – Data accessed 03/07/24

Sustainability Objective 13

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

Commentary:

Monitoring for Indicator 31, indicates that no planning decisions have been made contrary to Policy 54 (Community Facilities) which protects against the loss of community facilities.

| Year | Action | Analysis | Overview |
|-------------|---------------------|---------------------------------|---|
| 2021- 2022 | Continue Monitoring | Performance remains acceptable. |  |
| 2022- 2023 | Continue Monitoring | Performance remains acceptable. |  |
| 2023 – 2024 | Continue Monitoring | Performance remains acceptable. |  |

Sustainability Objective 14




Maintain and enhance biodiversity both within and outside designated sites

Commentary:

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

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

As of October 2023, a statement is now required with all new applications to describe how Green Infrastructure has been incorporated. This measure ensures that all applications include net benefit for biodiversity.

| Year | Action | Analysis | Overview |
|-------------|---------------------|---------------------------------|---|
| 2021- 2022 | Continue Monitoring | Performance remains acceptable. |  |
| 2022- 2023 | Continue Monitoring | Performance remains acceptable. |  |
| 2023 – 2024 | Continue Monitoring | Performance remains acceptable. |  |

Biodiversity Enhancements

Total to AMR Period

Increase this year

336
▲42

Sustainability Objective 15

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

Commentary:




Phosphorous in Rivers: Planning applications affecting phosphorus sensitive river Special Areas of Conservation²⁶

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

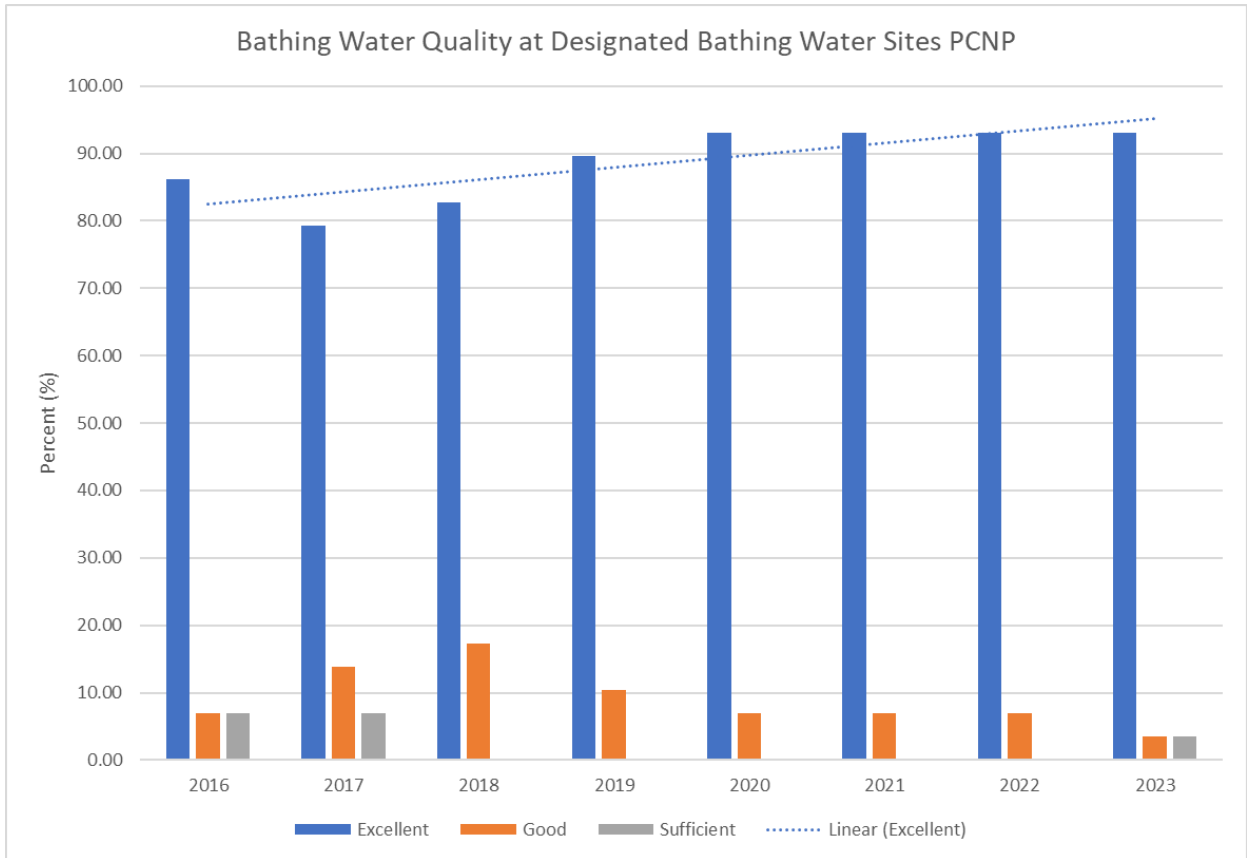
Information on Marine SACs is also awaited.

No change in bathing water quality between 2022 and 2023, remains predominantly excellent for designated beaches throughout the National Park.

In January 2024, NRW published an assessment of the compliance of Welsh River SACs against a number of other water quality targets including Dissolved Oxygen and total and unionised ammonia. Afonydd Cleddau and Teifi were amongst those with most target failures. Bathing water quality in the National Park is generally classed as good or excellent, however, there can be issues with storm overflows having an impact on bathing water quality.

| Year | Action | Analysis | Overview |
|-------------|---------------------|---|---|
| 2021- 2022 | Continue Monitoring | The strategy of the Plan is not affected by current issues with phosphorous elsewhere in Pembrokeshire. |  |
| 2022- 2023 | Continue Monitoring | Situation remains the same as previous years monitoring. |  |
| 2023 – 2024 | Continue Monitoring | Situation remains the same as previous years monitoring. |  |

²⁶ [Natural Resources Wales / Advice to planning authorities for planning applications affecting phosphorus sensitive river Special Areas of Conservation](#)



Bathing Water Quality at Designated Beaches ([DataMapWales](#)) – Accessed 19/07/24

Additional Contextual Indicator

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

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

Dealing with each in turn

The number of households with no usual resident 2011:

A breakdown is provided in the Authority's Background Paper for the Local Development Plan Examination on 'Principal Residence and/or local Connections²⁷ Policy using Census 2011 figures (Census data from 2021 has not yet been released). The relevant extract is copied below for ease of reference. **The first opportunity to have comparator information will be when the 2021 Census data is published.** As at mid- August 2024 data at a Community level is not available to compare.

Households with no usual resident

Definitions:

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

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

(Ranked by percentage)

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

Table 10 No Usual Resident

| Community | Percent no usual resident | Within the National Park? | In Welsh Language Sensitive Area?* |
|------------------|----------------------------------|----------------------------------|---|
| Lamphey | 48.2 | Partly | No |
| Newport | 37.3 | In | Yes |
| The Havens | 35.5 | Partly | No |
| Dale | 33.3 | In | No |

²⁷ [Background Paper Principal Residence and/or Local Connections Policy](#)

| Community | Percent no usual resident | Within the National Park? | In Welsh Language Sensitive Area?* |
|---------------------|----------------------------------|----------------------------------|---|
| Marloes & St Brides | 31.9 | In | No |
| Dinas Cross | 29.5 | In | Yes |
| Saundersfoot | 28.6 | In | No |
| Pencaer | 28.4 | Partly | Yes |
| St Mary Out Liberty | 28.1 | Partly | No |
| St Davids | 26.9 | In | Yes |
| Llanrhian | 26.5 | Partly | Yes |
| Nolton & Roch | 26 | Partly | No |
| Amroth | 25.3 | Partly | No |
| Solva | 25.2 | Partly | Yes |

*Please see Policy 13 Development in Welsh Language Sensitive Areas

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

Second homes – number of second homes in the area (threshold – more than 25% used by Gwynedd and Anglesey). A breakdown is provided in the above Background Paper - see also the Table below for ease of reference highlighting those specific communities where the threshold is reached. An update is provided for 2021 and 2022 and 2023.

| Community | Percentage of homes subject to the second homes council tax premium 2019 (25% or more highlighted) | Percentage of homes subject to the second homes council tax premium 2021(25% or more highlighted) | Percentage of homes subject to the second homes council tax premium 2022 (25% or more highlighted) | Percentage of homes subject to the second homes council tax premium 2023 (25% or more highlighted) | Percentage of homes subject to the second homes council tax premium 2024 (25% or more highlighted) | Reduction in percentage of Properties 2023 to 2024 |
|-------------------|---|--|---|---|---|---|
| Caldey | 26% | 35% | 30% | Below 25% (17%) | Below 25% (11%) | ↓ 6% |
| Dale | 34% | 32% | 36% | 35% | 31% | ↓ 4% |
| Newport | 26% | 25% | 25% | Below 25% (24%) | Below 25% (20%) | ↓ 5% |
| The Havens | 29% | 30% | 31% | 26% | Below 25% (21%) | ↓ 4% |

Caldey: There have been no housing completions in Caldey during this period. That can only mean that properties already built on the island have been re-categorised under the Council Tax system.

Dale shows a small percentage decrease overall, but remains above 25%. There was one completion recorded for the Community Council area for the period 2019 to 2024.

There has been a further decline in the percentage shown as Second Homes in **Newport** between 2019 and 2024, and is now 20%.

In **The Havens** there was an increase from 29% to 31% between 2019 and 2022 but then a decline to 26% overall in 2023 and a further decline to 21% in 2024.

The provision of community facilities

In terms of facilities available that qualify Centres as Rural Centres, there has been a loss of qualifying facilities outside the Authority's planning jurisdiction in two split Centres. The extent of the settlements in the Authority's jurisdiction is not significant in scale. There is a need to continue monitoring in order to appraise the situation at review stage. In terms of the larger Centres, the range of facilities required to qualify these Centres as Tier 1 and Tier 2 Centres remain. The main findings for 2024 are that overall counts of community facilities are stable. However, there were five local shops identified as closed. Online research identified one owner as advising that it was down to cost-of-living issues along with a combination of factors. The Authority does not have any information regarding the other closures. The Association of Convenience Shops for Wales more generally refers to issues such as energy, employment and supply chain costs and are finding it difficult to hold back further price increases for consumers.²⁸

Schools and School Occupancy Levels

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

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

'A number of schools have significant surplus places and are well placed to be able to accommodate any additional pupil yield from new housing; these include, St Dogmael's CP, Ysgol Eglwysrwr,, Stepside CP and Saundersfoot CP. In the case of the latter two schools, their position is replicated in a number of other schools in the wider Tenby area; however, Ysgol Hafan y Mor in Tenby is at capacity. In the St David's area, Ysgol Penrhyn Dewi VA school in St Davids continues to be at capacity.'

Extract from the Local Development Plan 2 Background Paper on '*Principal Residence and/or Local Connections Policy*'

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

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

²⁸ [Association of Convenience Stores report: How local shops are navigating the cost of trading crisis](#)

and are likely to come under increased pressure from additional housing yield; such schools are Ysgol Penrhyn Dewi VA, Coastlands CP and Lamphey CP. It should be noted that in the case of schools such as Stepside CP, there is likely to be pressure arising from housing developments arising from both the National Park and County Council planning areas.

- *In short it is not the case that all communities in the National Park are suffering from high numbers of empty school places, indeed some schools may come under pressure from new development within the Park during the plan period.*

Conclusion: A review of the data overall shows that:

The Census 2021 figure on dwellings with no usual resident is awaited so that a comparison can be drawn with the 2011 figures.

- With regard to properties paying Council Tax premium there has been a small decline in some communities. This is because of significant changes in the Council Tax system over recent years. The availability of records for individual properties at the end of the calendar year 2022 has provided more information to assist in the role land use planning can play in addressing any issues arising regarding second and holiday homes.²⁹
- With regard to community facilities there is no clear indication that there has been a deterioration in general in the range of facilities in Centres. A decline in the number of local shops is identified with the possibility that the reasons behind it are associated with the cost-of-living crisis more generally.
- The situation regarding schools and schools occupancy doesn't identify issues related to second and holiday homes. With the availability of Council Tax data the Authority has also the ability to consider the likelihood of new development being occupied as second and holiday homes. This is now generally part of the appraisal of planning applications coming forward in Centres.³⁰

Since the receipt of the Inspector's Report for Local Development Plan 2 (2020) there has been significant debate and proposed changes in relation to second homes and holiday lets by the Welsh Government. See context section at the beginning of the Visitor Economy, Employment and Rural Diversification Chapter for information on how the Authority is considering this issue (paragraph 3.22)

²⁹ [National Park Authority Report: The implications of recent Welsh Government Legislative and Planning Policy Changes in relation to Second Homes and Short-term Lets](#)

³⁰ [National Park Authority Report: The implications of recent Welsh Government Legislative and Planning Policy Changes in relation to Second Homes and Short-term Lets](#)

APPENDIX 1 THE TIMING AND PHASING OF NEW ALLOCATIONS

| Settlement Tier | Allocated Site Name | Total Site Capacity | Time lag to construction start in months | | | Phasing of Development (2015 - 2031) | | | | | | | | | | |
|-----------------------------|--|---------------------|--|---|--|--------------------------------------|-----|-----------|-----------|-----------|-----------|-----------|-----------|-----------|------------------------------|---|
| | | | Time period for pre-application discussions / PAC consultation | Time between submission of planning application and determination | Time taken from planning consent to the discharge of relevant conditions to enable site construction | Completions | U/C | 2024 -25 | 2025 - 26 | 2026 -27 | 2027 -28 | 2028 - 29 | 2029 - 30 | 2030 -31 | Units beyond the plan period | |
| Newport (Tier 2) | Land North of the Business Park (HA1) | 15 | | | | | | | | 2 | 2 | 2 | 2 | 2 | 2 | 5 |
| Saundersfoot (Tier 2) | Land at Sandy Hill (HA2) | 68 | 28 days | | | | | | 34 | 7 | 7 | 7 | 7 | 6 | | |
| Saundersfoot (Tier 2) | North of Whitlow (HA3) | 54 | 28 days | 11 months | | | | 13 | 14 | 5 | 5 | 5 | 6 | 6 | | |
| Saundersfoot (Tier 2) | Penny Farm (HA4) | 36 | | | | | | | | 7 | 7 | 7 | 7 | 8 | | |
| Broad Haven (Tier 3) | North, east and south of Marine Road (HA5) | 87 | | | | | | | | 13 | 13 | 13 | 13 | 13 | 22 | |
| Lydstep (Tier 3) | West of the Green (HA7) | 10 | | | | | | | | 2 | 2 | 2 | 2 | 2 | | |
| Square and Compass (Tier 3) | Glasfryn Field (HA8) | 7 | | | | | | | | 1 | 1 | 1 | 1 | | 3 | |
| Square and Compass (Tier 3) | Land adjacent to Bryngolau (HA9) | 10 | | | | | | | | 1 | 1 | 1 | 1 | | 6 | |
| Trefin (Tier 3) | Land off Cefn Gallod (HA10) NP/21/0577/FUL | 11 | 28 days | 12 months | | | | 11 | | | | | | | | |
| Totals | | 298 | | | | | | 24 | 48 | 38 | 38 | 38 | 39 | 37 | 36 | |

APPENDIX 2 THE TIMING AND PHASING OF SITES WITH PLANNING PERMISSION

| Settlement Tier | Site Name | Total Site Capacity | Completions | U/C | 2024 -25 | 2025 - 26 | 2026 -27 | 2027 -28 | 2028 - 29 | 2029 - 30 | 2030 - 31 | Units beyond the plan period |
|-----------------------|--|---------------------|-------------|----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|------------------------------|
| Tenby (Tier 1) | White Lion Street / Deep Park / Upper Park Road (Delphi) (NP/11/064) | 62 | 51 | | | | | | | | | 11 |
| Saundersfoot (Tier 2) | Cambrian Hotel (NP/12/0054) | 29 | 13 | | | | | | | | | 16 |
| Saundersfoot (Tier 2) | The Incline (Ocean Point) (99/254, 06/611 and NP/14/0439) | 20 | 16 | | | | | | | | | 4 |
| St. Davids (Tier 2) | North of Twr y Felin (99/254 and 06/611) | 9 | 8 | | | | | | | | | 1 |
| St. Davids (Tier 2) | West and East of Glasfryn Road (NP/18/0575/OUT and NP/19/0648/RES) | 58 | 22 | | 25 | 11 | | | | | | |
| St. Davids (Tier 2) | Adjacent Ysgol Bro Dewi (NP/18/0488/OUT) | 11 | | | 11 | | | | | | | |
| Jameston (Tier 3) | Opposite Bush Terrace (NP/18/0610/FUL) | 38 | | | 21 | 17 | | | | | | |
| Lawrenny (Tier 3) | Adjacent Home Farm (NP/18/0622/FUL) | 39 | | | | 19 | 4 | 4 | 4 | 4 | 4 | |
| Solva (Tier 3) | Ynys Dawel (HR/6124) | 6 | | | | | | | | | | 6 |
| St. Ishmaels (Tier 3) | Adj Primary School, Trewarren Road (NP/21/0743/FUL) | 15 | | | 7 | 8 | | | | | | |
| Countryside (Tier 4) | Blockett Lane, Little Haven (10/511) | 6 | | | | | 1 | 1 | 1 | 1 | 2 | |
| Countryside (Tier 4) | Boulston Manor, Uzmaston (04/400) | 5 | | | | | | | | | | 5 |
| Countryside (Tier 4) | Brynhir, Tenby (NP/19/0361/OUT) | 125 | | | | | 25 | 25 | 25 | 25 | 25 | |
| Countryside (Tier 4) | North of Bay View Terrace, Dinas Cross Phase II *NP/23/0076/FUL) | 15 | | | | 15 | | | | | | |
| Countryside (Tier 4) | Buttyland (NP/19/0522/FUL) Outline for housing | 14 | | | 3 | 4 | 2 | 2 | 2 | 1 | | |
| Totals | | 452 | 110 | 0 | 67 | 74 | 32 | 32 | 32 | 31 | 31 | 43 |

Report of Consultations

APPENDIX B LDP 2 Annual Monitoring Report 2

| Rep No. | Reference | Representation | Officer Response and Recommendation |
|---------|--|---|--|
| 1. | 3511 / H Gardiner, Tenby Civic Council | <p>Thank you for the information in your email of 25 March. I set out Tenby Civic Society executive committee responses to the monitoring documents concerning second homes and holiday lets ('C5' and 'C6')</p> <p>The Executive Committee discussed this thoroughly - their formal comments are underlined - the other points briefly state their context.</p> <p>The Park's valuable and timely analysis of rating data show what we can call the <u>Old Town of Tenby has a C5 and C6 combined percentage at 40 - well above the Monitoring trigger level of 27% - so the situation is of serious concern.</u></p> | <p>Comments are noted from the Tenby Civic Society regarding the concern at the level of second homes and short term holiday lets in the Old Town of Tenby.</p> <p>The National Park Authority is receiving data from Pembrokeshire County Council's Council Tax department to monitor the situation and what impact recent changes to legislation and Council Tax charges may be having.</p> |
| 2. | 3511 / H Gardiner, Tenby Civic Council | <ol style="list-style-type: none"> <u>A continuing increase will damage Tenby and its social character - action is needed.</u> <u>There was discussion to lower the 40% maximum, but it was felt that holiday lets played a part in visitor capacity, so reduction could affect the value of the important holiday trade in the town.</u> It was also noted that a number of second homes were heritage Georgian and Victorian buildings whose owners contributed value to their buildings character, condition and preservation and thereby to the heritage character of the town - which is a treasured part of the special character of the Town and the National Park, recognised by Park Conservation policies. The physical character of the Old Town was felt to good, the social character is the issue. <u>The committee concluded that steps are needed currently to prevent the percentage from increasing above 40% as a balanced approach for now. There could also be a need to prevent transfers out reducing the residential (C3) share in Tenby's suburbs.</u> | <p>For new residential developments, the National Park Authority has been considering whether to restrict the use of development for primary residence only (Use Class C3) and to remove permitted development rights to prevent second homes and short term lets (Use Class C5 and C6).</p> <p>The total housing requirement for LDP 2 assumed that 26.7% of properties would be used as either second homes or holiday homes. This figure was derived from the Census 2011 as the average across the whole of the National Park. The NPA has taken the view that where analysis shows the proposed development may attract a higher level of second and holiday homes above 26.7%, a planning condition to restrict permitted changes may be imposed.</p> <p>The link to the report below details the approach taken by the NPA for a proposed development in Tenby. It outlines the considerations regarding prevalence of second homes and holiday lets in Tenby compared with the prevalence in the NP as a whole, areas within Tenby where there are clusters of second homes, information from recent completions on large sites and for similar types of</p> |

| Rep No. | Reference | Representation | Officer Response and Recommendation |
|---------|--|--|--|
| | | | <p>flatted development and the impact on the financial viability of the site.</p> <p>NP 21 0593 FUL.pdf (pembrokeshirecoast.wales)</p> |
| 3. | 3511 / H Gardiner, Tenby Civic Council | <p>The committee were disappointed that LDP2 policies seem to gear action to whether the limited Plan affordable housing targets have not been met. These are low so would obviously allow the 40% to be exceeded. The fact that all Tenby's affordable housing is socially rented is warmly welcomed but only marginally material to the risk of 40% being exceeded.</p> | <p>The AMR monitors delivery of affordable housing in relation to LDP 2 policies and targets. LDP 2 Policy 48 Affordable Housing (Strategy Policy) sets a requirement for private market housing to deliver 50% affordable housing on sites of 2 or more dwellings in Tenby.</p> |
| 4. | 3511 / H Gardiner, Tenby Civic Council | <ol style="list-style-type: none"> 1. <u>The committee felt the new structure of residential rating categories could allow the Planning Authority to require each newly bought property registered by the owner as C5 and C6 to submit a planning application to control changes with more precision than currently.</u> A case by case approach could prevent increases or losses, depending on the balance of trends to which the different interests will be sensitive. 2. The annual LDP monitoring process must use the new powers as well as assess housing trends; the authority's current position is disappointing. The LDP Inquiry decisions appeared to down play trends. If the 2021 Census disaggregated social data is not forthcoming very soon a research project could needed in target Park areas to check age and household types by tenure 2011 to 2024. 3. Monitoring rating changes year by year is clearly a valuable tool the Authority has found and should use. | <p>Comments are noted. Local Planning Authorities can introduce an Article 4 Direction to remove permitted development rights to move between Use Class C3, C5 and C6, where there is robust evidence for doing so.</p> <ol style="list-style-type: none"> 2. Figures from the Census 2021 have not yet been released. The Authority does receive data from Pembrokeshire County Council. 3. The Authority is monitoring the number and percentage of second homes and holiday lets. |

| Rep No. | Reference | Representation | Officer Response and Recommendation |
|---------|--|---|---|
| 5. | 1670 / Louise Edwards, Natural Resources Wales | <p>INDICATOR 15 and SUSTAINABILITY OBJECTIVE 6 Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health. You refer to the C2 Flood Zone, we also refer to the Flood Map for Planning (FMfP) (NRW letter sent to all LPA's dated 14/01/2022). The letter was to inform LPA's that our advice is now based on the best available flood risk information we hold, so we consider both the DAM and the FMfP as part of the consultation process and providing comments accordingly.</p> | <p>Noted. Colleagues in Development Management consider both Development Advice Maps and Flood Map for Planning when determining planning applications. Reference has been made to the Flood Map for Planning in the relevant section of the AMR.</p> |
| 6. | 1670 / Louise Edwards, Natural Resources Wales | <p>SUSTAINABILITY OBJECTIVE 15: Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters. There is a statement which reads: "Currently there are two affected areas in the National Park where limited development takes place (Rosebush and Bosherton)." Please note Bosherton falls outside of the Phosphorus SAC catchment.</p> | <p>Noted. Reference to Bosherton as being affected by the phosphorus SAC catchment has been deleted in the AMR.</p> |