

Report of: Principal Planning Officer – Strategic Policy

Subject: 2024-2025 Annual Monitoring Report on the Pembrokeshire Coast National Park Local Development Plan 2

Decision Required: Yes

Recommendation:

The Authority is recommended to:

- a. Approve the Annual Monitoring Report 2024-2025 (see Appendix A) for the Pembrokeshire Coast National Park Local Development Plan for submission to the Welsh Government by 31 October 2025.
- b. Approve the responses to the representations received on the 2023-2024 Annual Monitoring Report in Appendix B to this report.

1. Key Messages

This report is to seek agreement from Members to submit the Annual Monitoring Report for 2024-2025 (AMR 4) to Welsh Government by 31 October 2025 (Appendix A) and to approve the responses to the representations received on the 2023- 2024 Annual Monitoring Report (AMR 3) (Appendix B).

2. Background

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 31 March.

The Report assesses the extent to which Local Development 2 strategy and policies are being achieved by measuring various indicators to assess the performance of individual planning policies as set out in the adopted Local Development Plan. The Report provides a general portrait of the social, economic and environmental conditions in the National Park.

'Key Findings' can be found at the beginning of the document which sets out where issues have arisen and what further action is required.

This is the fourth Annual Monitoring Report since the adoption of Local Development Plan 2 in September 2020 covering the financial year April 2024 to the end of March 2025. Members are asked to agree this Annual Monitoring Report for submission to Welsh Government by the end of October 2025.

3. Consultation

The third 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.

4. Strategic Policy Context

The information and recommendation(s) contained in this report are consistent with the Authority's statutory purposes and its approved strategic policy context.

The Authority has a statutory duty to keep the development plan up to date and undertake annual monitoring of the adopted Local Development Plan. The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended in 2015), requires the local planning authority to publish its annual monitoring report on its website and submit the report to the Welsh Government before the end of October under Regulation 37. The regulations specify that the report must identify where a policy is not being implemented and include a statement of reasons why that policy is not being implemented; the steps the planning authority intend to take to secure that the policy is implemented and whether the planning authority intends to revise the LDP to replace or amend the policy. Regulation 37 also requires the AMR to specify the number of net additional affordable and general market dwellings built in the previous year and since adoption of the LDP.

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 was completed and submitted to Welsh Government in March 2025 and concluded that a full revision of the Local Development Plan was required. Work has commenced on LDP 3, and the Delivery Agreement was submitted to Welsh Government in September 2025.

5. Financial Considerations

Local Development Plan monitoring is budgeted for by the Authority.

6. Risk and Compliance Considerations

The preparation and publication of an Annual Monitoring Report is a statutory requirement and has been completed in accordance with The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended in 2015) and guidance in the Development Plans Manual.

7. Impact on our Public Sector Duties

7.1 Integrated Assessment Completed: No

7.2 Equality, Socio-Economic, Health and Human Rights Impacts

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).

The process for Local Development Plan preparation and its rigorous assessment procedures includes an Equality Impact Assessment. This, however, is a monitoring report and does not contain policy, procedure, practice or guidance.

7.3 Welsh Language Impacts

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.

Policy 13 (Development in Welsh Language-Sensitive Areas) has been monitored in this report and no issues have arisen.

No consultation responses were received in Welsh or raised any concerns regarding the Welsh Language.

7.4 Section 6 Biodiversity Duty and Carbon Emission Impacts

Policies within the Local Development Plan relate to biodiversity, sustainable design and renewable and low carbon energy. In the AMR (Appendix A), Sustainability Objective 14 is to 'Maintain and enhance biodiversity both within and outside designated sites' which is delivered through the Plan's biodiversity policies and through conditions applied to planning permissions to deliver a net benefit for biodiversity. During the monitoring period, 351 planning applications either included biodiversity enhancements or such enhancements were requested as a condition of permission. The Annual Monitoring Report has not raised any negative impacts on biodiversity or current carbon emission impacts.

7.5 Well-being Goals for Wales and 5 Ways of Working (Sustainable Development Principles) Impacts

The Local Development Plan is aligned with the Well-being Goals for Wales and the five ways of working.

8. Conclusion

Members are asked to agree the Annual Monitoring Report 2024-2025 (Appendix A) and the responses received to representations received on the Annual Monitoring Report 2023-2024 (Appendix B).

9. List Background Documentation:

- Annual Monitoring Report 2024-2025 (Appendix A)
- Responses to representations on AMR 3 (Appendix B)

(For further information please contact Gayle Lister,
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Pembrokeshire Coast National Park

Local Development Plan 2

(end date 2031)



Annual Monitoring Report 4

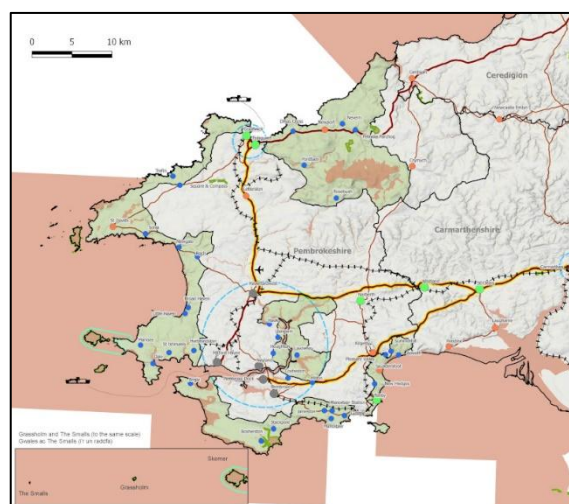
October 2025

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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 fourth report is for the financial year April 2024 to end of March 2025.

2. Key trends at a glance

- 2.1 This is the fourth Annual Monitoring Report for the Pembrokeshire Coast National Park Local Development Plan 2. It covers the fourth full financial year since Local Development Plan 2 was adopted in September 2020 and covers the financial year from April 2024 to March 2025. It is a statutory requirement for the report to be submitted to the Welsh Government by the 31 October 2025.
- 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	An alternative indicator is required for this objective.
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

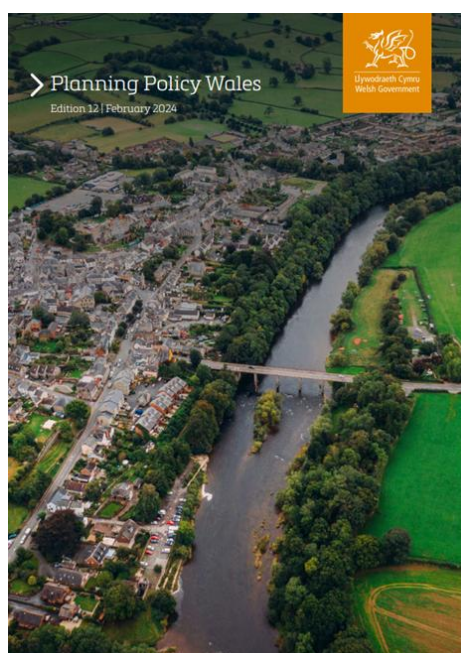
- 1) The special qualities of the National Park have been conserved and enhanced.
- 2) Development takes place in accordance with the strategy of the Local Development Plan.
- 3) Development permitted helps to sustain local communities.

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. These environmental and biodiversity measures in PPW respond to the declared nature emergency in Wales, which recognises the alarming decline in biodiversity, habitat loss and species at risk of extinction.



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

3.7 Community Facilities Survey

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

3.8 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. A review of existing community facilities will be carried out as part of the evidence base for Local Development Plan 3. Recorded losses or increases in community facilities will inform the strategy of the new plan as to whether any new Rural Centres should be added or any taken out of the revised plan.

Analysis 2024-2025:

One application was recommended for refusal as being contrary to Policies 1,7,8,14, 29 and 30 (see Indicators 2, 3, 4 and 6).





The trigger of 3% has not been breached and the Local Development Plan 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.	
2024-2025	1	0	1	Continue Monitoring	Trigger reached – see analysis below. ³	

Analysis 2024-2025:

The application was recommended for refusal by Officers as it was considered to be an over-development of the site thus causing harm to the special qualities of the National Park. Members approved the application on the basis that there was a different interpretation of policy in relation to conserving and enhancing the National Park. The Sandford Principle was not invoked.





³ For further information see Officer Report [NP_24_0596_FUL.pdf](#) and Development Management Committee minutes [DEVELOPMENT MANAGEMENT COMMITTEE](#) item 6 (c).

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.	
2024-2025	2	0	1	Continue Monitoring	Performance remains below the Trigger point.	

2A Special qualities

Key outcomes

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

Context

3.10 The National Park Partnership Plan 2025-2029 with revised special qualities was adopted on 26 March 2025. The Special Qualities as applicable to the majority of this monitoring period are listed in the table below. The revised Special Qualities are listed on page 12.

Policy Performance





Special Qualities	
Coastal splendour	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.	
2024-2025	2	0	1	Continue Monitoring	Performance remains below the Trigger Point (see analysis below)	

Analysis 2024-2025:

One application was recommended for refusal by Officers as it was considered to be an over-development of the site thus causing harm to the special qualities of the National Park. Members approved the application on the basis that there was a different interpretation of policy in relation to the development not being harmful to the special qualities (see footnote 3 for Officer Report and Committee Meeting Minutes).





Partnership Plan 2025-2029

The National Park Partnership Plan (formerly Management Plan) was adopted by the National Park Authority on 26 March 2025. In consultation with partners and members of the public, the Special Qualities of the Pembrokeshire Coast National Park have been revised and will form a material consideration when determining planning applications in addition to LDP2 Policy 8 Special Qualities.

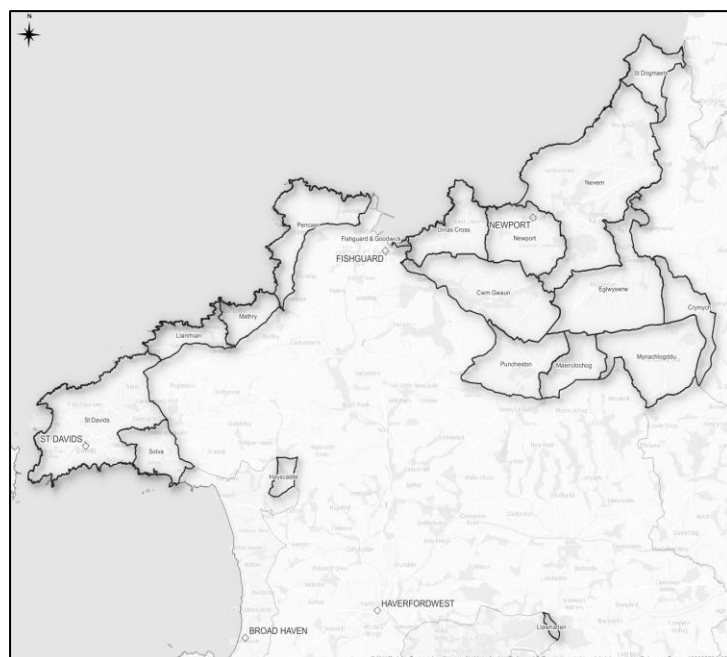
The special qualities of the Pembrokeshire Coast National Park are:

- Landscapes and seascapes of exceptional diversity and quality
- Outstanding coastal scenery
- Distant uninterrupted views and open horizons
- Beaches
- Spectacular geology and geomorphology
- Rich and varied wildlife
- Tranquillity, soundscapes and wildness
- Dark skies
- Rich heritage and culture
- Welsh language and Pembrokeshire dialects
- Historic patterns of settlement and buildings
- Historic patterns of land use and traditional boundaries
- Excellent opportunities to enjoy and experience the National Park
- A comprehensive network of Rights of Way
- The combination of special qualities
- A sense of community and stewardship

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	
2024-2025	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	See AMR 3 for analysis	
2024-2025	2	0	1	Continue Monitoring	One application was recommended for refusal by Officers as it was considered to be an over-development of the site thus causing harm to the special qualities of the National Park. Members approved the application on the basis that there was a different interpretation of policy in relation to the development not being harmful to the special qualities (see footnote 3 for Officer Report and Committee Meeting Minutes).	

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





Target is 0% loss of greenfield⁴, open space⁵, 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.	
2024-2025	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.	
2024-2025	1	0	0	Continue Monitoring	Performance remains below the Trigger point.	

⁴ Except for land released in accordance with the Plan's policies.

⁵ 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.	
2024-2025	1	0	0	Continue Monitoring	Performance remains below the Trigger point.	

2B 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 fourth report for the new region of Mid and South-West Wales Waste Planning Monitoring Report covers the period 2024-25. 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 2025. 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 2021/22 reporting period, the 2024/25 target of 70% recycling has already been achieved collectively in the region in the 2023/24 period.
- The predicted remaining landfill capacity for the region is only 2.7 years – this figure is now below the 5 year threshold set out in Technical Advice Note 21: Waste – the identified trigger 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 4 authorities in Wales meeting the 2024/25 target of 70% for recycling rates, achieving over 70% for the past 5 monitoring periods. The latest figure is 72% in 2023/24, an increase from 71.6% in 2022/23.





Policy Performance

Indicator 8

Approval of major 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.	
2023-2024	1	0	0	Continue Monitoring	Performance remains below the Trigger point.	
2024-2025	1	0	0	Continue Monitoring	Performance remains below the Trigger point.	

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





Indicator 9**Approval of minerals development⁷ 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. ⁸	
2023- 2024	1	0	0	Continue Monitoring	Performance remains below the Trigger point.	
2024-2025	1	0	0	Continue Monitoring	Performance remains below the Trigger point.	

⁷ What constitutes 'exceptional circumstances' in National Parks is defined in Planning Policy Wales.

⁸ 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.

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.	
2024-2025	2	0	0	Continue Monitoring	Performance remains below the Trigger point.	

2C 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 Climate Change:** Following the declaration of a Climate Change emergency in Wales in 2019, the Climate Change Committee published its first progress report on emission reducing targets “Reducing Carbon Emissions in Wales (2020). The report recognizes the actions taken in Wales to reduce greenhouse gas emissions, including promoting electric vehicles and public transport, enhancing energy efficiency in buildings, improving recycling rates and increasing renewable energy generation. In February 2021, the Welsh Government announced its commitment to reaching net zero emissions by 2050 through the publication of The Climate Change (Wales) Regulations 2021. The Review of Wales Energy Targets 2023 sets more ambitious targets, with a target for 100% renewable electricity by 2035. There is a need for planning to ensure there are both mitigation measures to address the causes of climate change and adaptation measures to tackle the effects of changing weather and climate to ensure infrastructure is resilient.
- 3.14 Flooding:** An updated version of TAN15: Development, flooding and coastal erosion was published on 31 March 2025 by Welsh Government. This is the first update to TAN15 since its initial release in 2004. The revised TAN15 has taken immediate effect, restructuring the existing policy framework for flood risk management. As part of this update, TAN14: Coastal Planning has been withdrawn, as its provisions on coastal erosion have now been embedded into the updated TAN15. The TAN should be read in conjunction with Planning Policy Wales and Future Wales and should be taken into account by planning authorities in the preparation of Development Plans. Importantly, the Development Advice Maps which sat alongside the superseded TAN15, have been revoked and all applications will now be assessed against the Flood Map for Planning (FMfP) which represents the best available information.
- 3.15** New changes to TAN15 namely include the differentiation between new development and redevelopment, the different approaches in respect of brownfield and greenfield sites, and the more flexible approach to facilitating regeneration, if it supports the implementation of LDP or regeneration plans. The TAN still includes vulnerability considerations for different types of development ranging from less vulnerable to highly vulnerable. These definitions remain unchanged from the previous TAN.

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.	
2024-2025	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 heat⁹**

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	As above.	0.495 GWh from 7 permissions granted since 2016.	Continue Monitoring	As above.	
2023-2024	As above.	0.506 GWh from 8 permissions granted since 2016.	Continue Monitoring	As above.	
2024-2025	As above.	0.636 GWh from 13 permissions granted since 2016	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 13**Renewable energy capacity of renewable energy schemes permitted and completed.****Target is 38.9GWh for renewable electricity¹⁰.**

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	As above	0.067 GWh from 14 permissions granted since 2016.	Continue Monitoring	As above.	
2023-2024	As above	0.269 GWh from 20 permissions granted since 2016.	Continue Monitoring	As above.	
2024-2025	As above.	0.309 GWh from 27 permissions granted since 2016.	Continue Monitoring	As above.	





¹⁰ 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.	
2024-2025	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.	
2024-2025	1	0	0	Continue Monitoring	Performance is below the Trigger point.	

2D 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

3.16 **Welsh Government and policy for second homes and short-term holiday lets** **Welsh Government**¹¹ announced on 28 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.

3.17 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.¹² 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.

3.18 **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.





¹¹ [Written Statement: Changes to planning legislation and policy for second homes and short-term lets](#)

¹² [National Park Authority Report: The implications of recent Welsh Government Legislative and Planning Policy Changes in relation to Second Homes and Short-term Lets](#)





- 3.19 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.
- 3.20 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.
- 3.21 Overall, during this monitoring period there have been 3 planning applications for camping, caravan and chalet development which were approved. One was for a Certificate of lawfulness for the use of touring caravans and tents to be used for holiday use only on a year-round basis. The description of the proposal was amended during the planning process to exclude the siting of static caravans on the site due to landscape concerns. Another application was for the use of land of up to 40 pitches for caravans, motorhomes, camper vans and tents on a site previously used as a 28-day site in 2020 and as an exempted, certificated site in 2021. The number of caravans permitted on this site at any one time has been restricted to 20. The final application was for the siting of one shepherd’s hut for holiday let uses.
- 3.22 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.
- 3.23 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(1) 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. An informal public consultation on the preferred options took place during the summer of 2024 and an Article 4(1) Direction was executed in December 2024. Notice of the Article 4(1) Direction was given with a six week period for formal representation between 10 January and 21 February 2025. The Article 4(1) Direction was confirmed by National Park Authority Members on 7 May 2025 and will take effect from 1 January 2026.

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.	
2024-2025	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.	
2024-2025	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.	
2024-2025	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.	
2024-2025	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.	
2024-2025	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.	
2024-2025	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

3.24 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.¹³

3.25 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.

3.26 Local Housing Market Assessment 2023¹⁴: The Authority is party to a County wide housing market assessment which was approved by Welsh Government in April 2025.

3.27 Gypsy and Traveller Accommodation Needs Assessment 2019¹⁵: The Authority is party to a County wide Gypsy and Traveller Accommodation Assessment which was approved by Welsh Government in May 2024.

3.28 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.

3.29 The next table and graph provides a breakdown on performance.

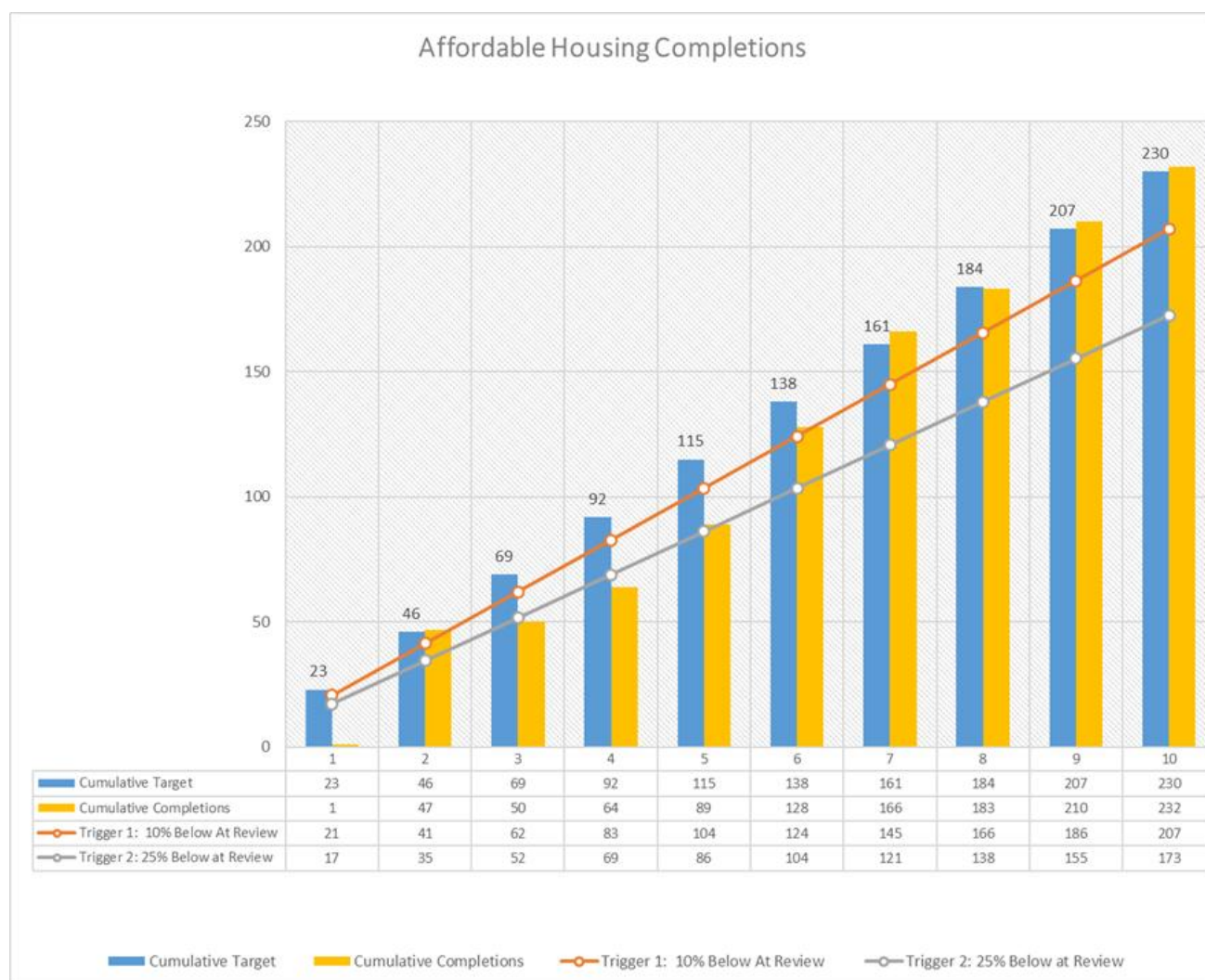
¹³ [Welsh Government: New house building](#)

¹⁴ Local Housing Market Assessment 2023 [Pembrokeshire Local Housing Market Assessment 2023 \(2\).pdf](#)

¹⁵ [GTAA Approved Eng \(9\).pdf](#)

3.30 Performance to date is from the base date of 2015 and shows the overall cumulative performance is on target as of end of March 2025.

	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	●
Year 10	2024-2025	23	230	207	173	22	232	101%	Continue Monitoring	●













Indicator 24**Policy 46, Policy 47, Policy 50 The number of net additional dwellings built¹⁶**

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.

3.31 Housing completion rates overall are above the cumulative target at this point – March 2024. Formal review in September 2024 showed that neither trigger had been reached and cumulative completions are above target. Sites are also mapped on our website.¹⁷

	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	
Year 10	2024-2025	62	593	534	445	55	633	89%	107%	Continue Monitoring	

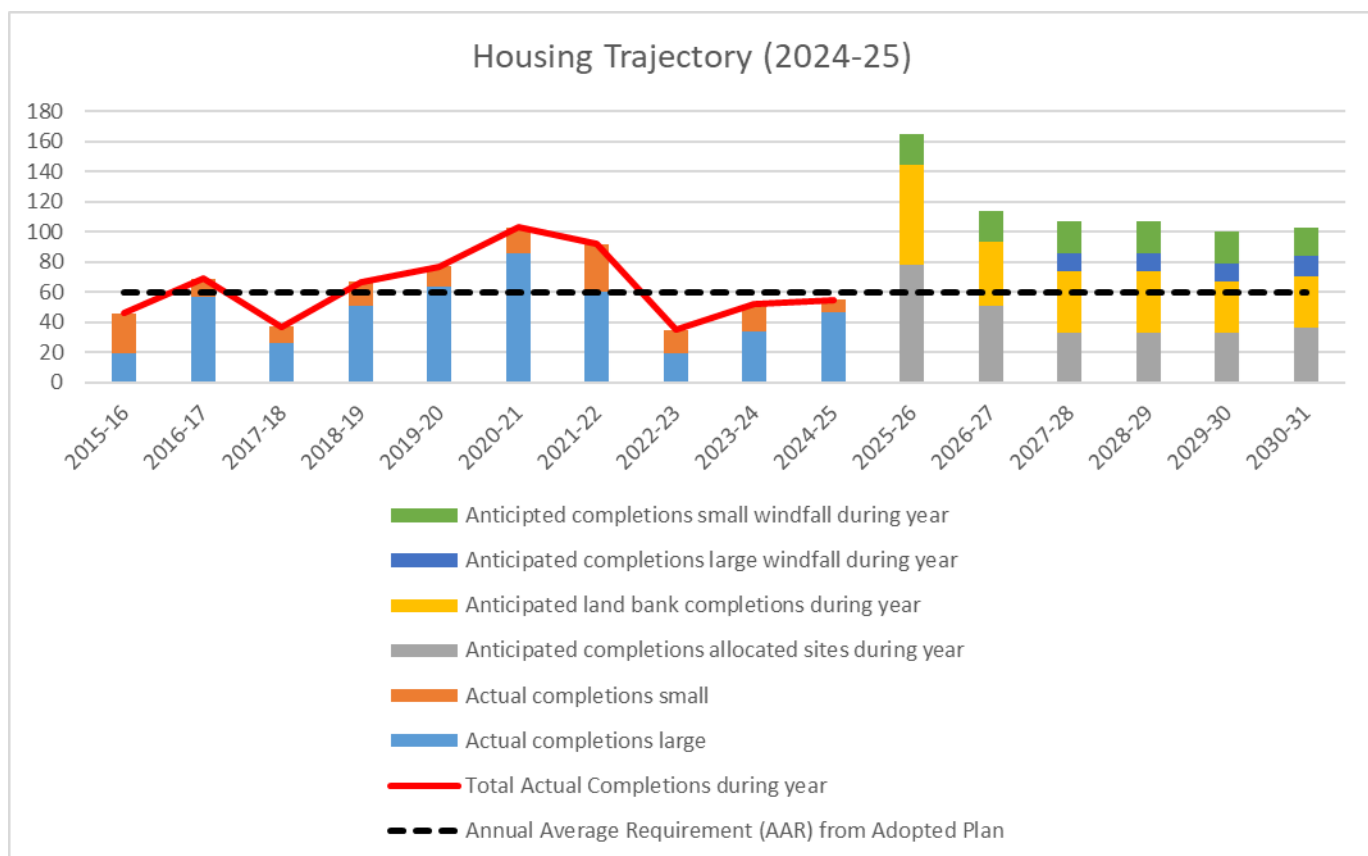
¹⁶ Please note that the reference to 960 dwellings completed during the Plan Period includes a target of 362 affordable units – See Policy 46 Housing (Strategy Policy).

¹⁷ [Local Development Plan Annual Monitoring \(arcgis.com\)](https://arcgis.com)













3.32 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).

3.33 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 2024-2025, 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	47						
Actual completions small	27	12	11	16	13	17	32	16	18	8						
Anticipated completions allocated sites during year											78	51	33	33	33	36
Anticipated land bank completions during year											66	42	41	41	34	34
Anticipated completions large windfall during year											0	0	12	12	12	14
Anticipated completions small windfall during year											21	21	21	21	21	19
Total Actual Completions during year	46	69	37	67	77	103	92	35	52	55						
Anticipated Annual Build Rate (AABR) from Adopted Plan											165	114	107	107	100	103
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	
2024-2025	60	55	-5	-8%	600	633	33	6%	Continue Monitoring	

3.34 More information on the phasing and delivery of sites 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.	See AMR 1 for detail	Continue Monitoring	See AMR 1 for analysis	
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.	See AMR 2 for detail	Continue Monitoring	See AMR for analysis	
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.	See AMR 3 for detail	Continue monitoring	See AMR 3 for analysis	

Year	Trigger	Target	Performance	Action	Analysis	Overview
2024-2025	(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 increased by 0.5% in 1Q 2025 resulting in annual growth of 2.3%. During the 12 month period April 2024 to March 2025, house prices at a National Level (Wales) increased by 3.8% while growth in Pembrokeshire rose by 2.6%. Principality Building Society, however, reported a 4.8% decrease in house prices in Pembrokeshire, with prices growing at 4% for Wales as a whole. Principality data is relatively small and only reports changes within its own mortgage portfolio in Wales and it is considered the UK Land Registry data is the more robust sample size.	Continue monitoring	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.	
2024-2025	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.	
2024-2025	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.	
2024-2025	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.	
2024-2025	20% of completions in the Countryside	90% of completions are in Plan's Centres	5.5% of completions were 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	
2024/25	22	21	95	Continue Monitoring	

The 2024-25 monitoring period includes one completion that was granted permission as a Rural Enterprise Dwelling. 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

3.35 **Retailing:** Covid-19 had a significant impact on retailing and town centres, and this is still having an impact 5 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 17.4% in Q4 of 2023 and Wales continues to have one of the highest high street vacancy rates in the UK.²¹ 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.

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





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

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





²¹ [Local Data Company](#)

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.	
2024-2025	1	0	0	Continue Monitoring	Performance remains below the Trigger point.	





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

Year	Trigger	Target	Performance	Action	Analysis	Overview
2021- 2022	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.	
2024-2025	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.	
2024-2025	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.	
2024-2025	Greater than 10% for 2 consecutive years	Less than 10%	Overall vacant floorspace = 6.9%	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%
2024-2025	6.9%	9.6%	8.5%	0%	1.1%

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.	
2024-2025	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 2025
Adopted	27 ²²	
Consultation	1	
Being drafted/redrafted	4	
Interim/rolled over	3	
Later/Stalled	4	

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. Cresswell Quay consultation period began 31/03/25.	

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
Conversions in the Countryside	New – to be consulted on and adopted in 2025.	
Landscape	Adopted June 2011 Interim Supplementary Planning Guidance Local Development Plan 2 – September 2020 Implementing Interim Guidance until LANDMAP updates received.	
Lighting / Dark Skies	Welsh Government Good Practice Guidance – Planning for the Conservation and Enhancement of Dark Skies to be adopted following consultation in 2025.	
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.	
Replacement Dwellings	New – to be consulted on and adopted in 2025	
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		

Title	Current Status – Annual Monitoring Report 2022	Status
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

3.37 In the period April 2024 to March 2025 there were 12 appeal decisions against refusals for planning permission. Three appeals were allowed and nine were dismissed. Two applications for costs were also dismissed along with the dismissal of the relevant appeal. Two appeals were against enforcement actions. One was allowed and the other was dismissed and the notice upheld.

Application Details	Reasons for Refusal	Appeal Decision ²⁵
NP/22/0600/FUL: New small static campsite and seasonal pitches on existing arable farmland	<p>Delegated Refusal:</p> <p>The proposal was not considered to constitute farm diversification and did not comprise any of the acceptable forms of development defined in Policy 7 (Countryside) and therefore a countryside location was not considered to be justified. The application site was also considered to be contrary to the principles of sustainable placemaking and contrary to the purposes of the National Park.</p> <p>Proposal considered contrary to Policies 1 (National Park Purposes and Duty), 7 (Countryside), 14 (Conservation of the Pembrokeshire Coast National Park), 29 (Sustainable Design), 38 (Visitor Economy), 41 (Caravan, Camping and Chalet Development), 45 (Farm Diversification) and 59 (Sustainable Transport).</p>	<p>CAS-02981-B6Y8Y6 Dismissed 03/05/2024</p> <p>Inspector concluded that the development did not comprise any of the acceptable forms of development defined in Policy 7 and would result in unacceptable development in the countryside which would have a harmful effect on the National Park, fail to conserve and enhance the natural beauty and have a harmful effect on the special qualities.</p> <p>The Inspector also stated that the proposal could not be considered as farm diversification and that the proposal would result in unsustainable development contrary to Policies 29 and 59 of the LDP and Planning Policy Wales.</p>

NP/22/0600/FUL: The dismissal of the appeal citing Policies 1,7,14, 29, 38, 41, 45 and 59 shows these policies are performing effectively.

²⁵ [Search for a case - Planning Casework \(gov.wales\)](#)

Application Details	Reasons for Refusal	Appeal Decision
NP/24/0005/FUL: Proposed first floor roof extension, new entrance porch, side extension and solar panels	<p>Delegated Refusal:</p> <p>The proposal was considered to have an unacceptably negative impact on the National Parks special qualities and the consequent enjoyment of those qualities.</p> <p>Proposal considered contrary to Policies 1 (National Park Purposes and Duty), 7 (Countryside), 8 (Special Qualities), 9 (Light Pollution), 11 (Nationally Protected Sites and Species), 14 (Conservation and enhancement of the Pembrokeshire Coast National Park), 29 (Sustainable Design) and 30 (Amenity).</p>	<p>CAS-03405-N7W7L9 Dismissed 12/04/2023</p> <p>Inspector concluded that the proposal would cause material harm to the character and appearance of the surrounding area and would fail to conserve and enhance the special qualities of the PCNP. The proposal would therefore be contrary to Policies 8, 14, 29 and 30 and also to the objectives of PPW 12.</p> <p>The Inspector also concluded that the proposal would secure biodiversity enhancements to provide a net benefit in compliance with Policy 11 and PPW.</p>

NP/22/0357/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/23/0356/DPO: Discharge of Section 106 to remove the agricultural occupancy restriction in legal agreement	<p>Delegated Refusal:</p> <p>The S106 legal agreement was considered necessary and reasonable in order to control a property permitted as an exception within a countryside location.</p>	<p>CAS-03299-J9V5M3 Allowed 09/09/2024</p> <p>The Inspector concluded that the planning obligation does not serve a useful purpose as it repeats the planning condition applied to the permission which details the permitted occupation of the property. The Inspector allowed the discharge of the condition.</p>

NP/23/0356/DPO: The appeal relates to the discharge of a planning obligation which repeats a condition attached to a planning permission. There are no policy conflicts with this appeal.

Application Details	Reasons for Refusal	Appeal Decision
NP/23/0124/FUL: Change of use of surplus public toilets to takeaway ice cream parlour/coffee bar and beach themed retail. Small rear extension to create kitchen together with new public disabled toilet	<p>Committee Refusal:</p> <p>The proposal to extend the property which lies wholly within the C2 flood zone would intensify the use of an existing building which is considered contrary to Policy 34 (Flooding and Coastal Inundation) and Policy 35 (Development in the Coastal Change Management Area). The proposed retail element was considered contrary to Policy 57 (Town and District Shopping Centres) and Policy 54 (Community Facilities).</p>	<p>CAS-03308-M9M1L2 Dismissed 27/09/2024</p> <p>The Inspector concluded that the property is situated in an area of significant flood risk and that the proposal failed to meet the justification tests as set out in TAN15. As such the proposal conflicts with Policies 34 and 35. The Inspector did not consider that the proposal would be contrary to Policy 57.</p>

NP/21/0381/FUL: The dismissal of the appeal citing Policies 34 and 35 show these policies are performing effectively.

Application Details	Reasons for Refusal	Appeal Decision
NP/23/0333/PNA: Proposed welfare shed / dry room building	<p>Delegated Refusal:</p> <p>The proposal was considered to require prior approval. It was considered that the proposed development, by virtue of creating a separate complex within an agricultural unit and not comprising any of the acceptable forms of development in the countryside, it would be contrary to Policy 7 (Countryside).</p> <p>Proposal considered to be contrary to Policies 1 (National Park Purposes and Duty), 7 (Countryside), 8 (Special Qualities), 14 (Conservation and enhancement of the Pembrokeshire Coast</p>	<p>CAS-03286-L3K6H0 Dismissed 09/10/2024</p> <p>The Inspector concluded that the applicant had not demonstrated that the building was not reasonably necessary and was also not a building designed for agricultural purposes and therefore not permitted by Part 6 of the GPDO. The Inspector therefore did not consider matters of the siting, design and external appearance of the building and no policies were considered.</p>

Application Details	Reasons for Refusal	Appeal Decision
	National Park), 30 (Amenity) and 43 (Employment Sites).	

NP/23/0333/PNA: The appeal relates to the GPDO . There are no policy conflicts with this appeal.

Application Details	Reasons for Refusal	Appeal Decision
NP/23/0556/FUL: Retention of residential annexe and residential curtilage extension	<p>Delegated Refusal:</p> <p>The proposal was considered to have created a separate dwelling house in a countryside location, contrary to Policy 7 (Countryside). It was also considered to have created a self-catering unit contrary to Policy 40 (Self-Catering Development). No financial contribution towards off-site affordable housing had been secured by legal agreement and the proposal was therefore considered to be contrary to Policy 48 (Affordable Housing).</p> <p>The extension of the curtilage would result in the loss of Grade 2 Agricultural Land (Best and Most Versatile) and therefore considered to be contrary to PPW.</p>	<p>CAS-03363-Z0R5T5 Allowed 08/10/2024</p> <p>The Inspector concluded that the main dwelling house was occupied under C3 use (a person's sole or main residence) and therefore the annexe was occupied for uses ancillary to the main dwelling house and not as a separate unit of accommodation. As such there was no conflict with Policy 7. As the conclusion deemed that the annexe is ancillary, Policy 40 was not relevant in this instance and as the development does not comprise new private market housing, Policy 48 was also not relevant.</p> <p>The Inspector also concluded that the extension of curtilage would not have a significant impact on the provision of best and most versatile agricultural land.</p>

NP/23/0556/FUL: The Inspector considered that the annexe was ancillary to the main dwelling. The appeal decision does not dispute the appropriateness or effectiveness of the policies and there is no evidence to suggest that the policies require immediate review.

Application Details	Reasons for Refusal	Appeal Decision
NP/24/0175/FUL: Rear first floor extension. Extended garage and reconfigured driveway / parking	<p>Delegated Refusal:</p> <p>The proposal was considered to be intrusive and result in a significant harmful visual impact especially on the special qualities.</p> <p>Proposal considered to be contrary to Policies 1 (National Park Purposes and Duty), 6 (Rural Centres), 8 (special Qualities), 14 (Conservation and enhancement of the Pembrokeshire coast National Park), 29 (Sustainable Design) and 30 (Amenity).</p>	<p>CAS-03692-Q1R7J0 Dismissed 15/11/2024</p> <p>The Inspector concluded that the proposed development would not conflict with Policies 1, 6, 8 or 14, but would be contrary to Policies 29 and 30 by virtue of not being well designed in terms of place and local distinctiveness and being of a scale incompatible with its surroundings.</p>

NP/24/0175/FUL: The dismissal of the appeal citing Policies 29 and 30 show these policies are performing effectively.

Application Details	Reasons for Refusal	Appeal Decision
NP/23/0555/S73: Variation of condition to extend permission for a further 5 years from original expiry date.	<p>Delegated Refusal:</p> <p>There has been a significant material change since the permission was granted and the application site now lies outside any Centre boundary and is located in the countryside. As such the proposal would now be contrary to Policy 7 (Countryside) which does not permit new build market housing in the countryside.</p> <p>Proposal considered to be contrary to Policies 7 (Countryside) and 50 (Housing Development Proposals).</p>	<p>CAS-03508-D8N9V2 Dismissed 18/11/2024</p> <p>The Inspector concluded that the proposed development would conflict with Policies 7 and 50. It was also concluded that varying Condition 1 to extend the time limit for implementing the planning permission would conflict with the extant development plan.</p> <p>An application for costs was refused as the Inspector concluded that unreasonable behaviour resulting in unnecessary or wasted expense by the Authority had not been demonstrated.</p>

NP/23/0555/S73: The dismissal of the appeal citing Policies 7 and 50 show these policies are performing effectively

Application Details	Reasons for Refusal	Appeal Decision
NP/23/0246/FUL: Change of use of pitch and putt are and expansion with 10 self contained bespoke mobile lodges /caravans and car parking together with ecological enhancements	<p>Committee Refusal:</p> <p>The proposed extension to the site was not considered to be well screened and would result in a visual intrusion into the landscape of the National Park, and fail to protect the sense of remoteness and tranquillity. It was also considered that the proposal was in an unsustainable location and would result in an increase in car usage and the loss of BMV Agricultural Land.</p> <p>Proposal considered to be contrary to Policies 8 (Special Qualities), 14 (Protection and enhancement of the Pembrokeshire Coast National Park), 29 (Sustainable Design) and 41 (Caravan, Camping and Chalet Development).</p>	<p>CAS-03561-G3F9L4 Dismissed 29/01/2025</p> <p>The Inspector concluded that the proposed development would be harmful to the rural character and appearance of the surrounding area and the Landscape Character Area and would fail to conserve and enhance the special qualities of the National Park.</p> <p>The Inspector concluded that the proposal failed to comply with Policies 8, 14 and 41 on landscape grounds, and Policies 29 and 59 with regard to an unsustainable location and reliance on the private car. It was also concluded that the proposal would result in the loss of BMV land and therefore contrary to PPW.</p>

NP/23/0246/FUL: The dismissal of the appeal citing Policies 8, 14, 29, 41 and 59 show these policies are performing effectively

Application Details	Reasons for Refusal	Appeal Decision
NP/22/0675/MOD: Proposed discharge of Section 106 agreement	<p>Delegated Refusal:</p> <p>The S106 legal agreement was considered necessary and reasonable in order to control a property permitted as an exception within a countryside location.</p>	<p>CAS-03493-R0N0B5 Allowed 04/02/2025</p> <p>The Inspector concluded that the planning obligation does not serve a useful purpose as it repeats the planning condition applied to the permission which details the permitted occupation of the property. The Inspector allowed the discharge of the condition.</p>

NP/22/0675/MOD: The appeal relates to the discharge of a condition which repeats a condition attached to a planning permission. There are no policy conflicts with this appeal.

Application Details	Reasons for Refusal	Appeal Decision
NP/24/0126/FUL: Demolition of existing kitchen. Alterations to existing fenestration and extension.	<p>Delegated Refusal:</p> <p>The proposal was not considered to accord well with the design, form or character of the host dwelling and would detract from the special qualities of the National Park and result in harm to visual amenity.</p> <p>Proposal considered contrary to Policies 1 (National Park Purposes and Duty), 7 (Countryside), 8 (Special Qualities), 14 (Conservation and enhancement of the Pembrokeshire Coast National Park), 29 (Sustainable Design) and 30 (Amenity).</p>	<p>CAS-03912-Z4V6P9 Dismissed 10/03/2025</p> <p>The Inspector concluded that whilst there was no conflict with Policies 8 and 14, the proposal would have a harmful impact on the character and appearance of the immediate area, contrary to the objectives of Policies 29 and 30 for development to be well designed in terms of place and distinctiveness and to be of a scale compatible with its surroundings.</p>

NP/24/0204/FUL: The dismissal of the appeal citing Policies 29 and 30 show these policies are performing effectively

Application Details	Reasons for Refusal	Appeal Decision
NP/24/0204/FUL: Erection of a Community Cash Pod	<p>Delegated Refusal:</p> <p>The proposal was considered to have an unacceptable impact on the special and historic qualities of the National Park at this location. It was also considered that the proposal would be visually intrusive, not provide a net benefit for biodiversity and was of a scale, siting and design that was contrary to the retail policy.</p> <p>Proposal considered contrary to Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 14 (Conservation and enhancement of the Pembrokeshire Coast</p>	<p>CAS-03782-L1M6C7 Dismissed 26/03/2025</p> <p>The Inspector concluded that the proposed cash pod would cause harm to the significance of a scheduled monument and fail to preserve the character and appearance of the Conservation Area, as well as the special qualities of the National Park.</p> <p>The Inspector concluded that the proposal was contrary to Policies 1, 8, 14, 29, 30, 56 and 57.</p> <p>An application for costs was refused as the Inspector concluded that unreasonable behaviour resulting in unnecessary or wasted expense by the Authority had not been demonstrated.</p>

Application Details	Reasons for Refusal	Appeal Decision
	National Park), 29 (Sustainable Design), 30 (Amenity), 56 (Retail in the National Park) and 57 (Town and District Shopping Centres).	

NP/24/0204/FUL: The dismissal of the appeal citing Policies 1,8, 14, 29, 30, 56 and 57 show these policies are performing effectively.

Enforcement Appeals

Application Details	Reasons for Enforcement	Appeal Decision
Enforcement Notice EC21/0041 – breach of planning control: installation of four roof lights and erection of glass balustrade along front boundary forecourt wall.	<p>The planning breach was considered to cause harm to the amenity of the National Park.</p> <p>The development is considered to be contrary to Policies 1, (National Park Purposes and Duty), 8 (Special Qualities), 14 (Conservation and enhancement of the Pembrokeshire Coast National Park) and 29 (Sustainable Design).</p>	<p>CAS-02702-F3N3G4 Allowed 03/02/2025</p> <p>The Inspector concluded that the development has little impact within the wider Conservation Area and does not alter the prevailing character of the village. The Inspector concluded that the development did not conflict with Policies 1, 8 or 14.</p> <p>The enforcement notice was quashed and planning permission granted.</p>

EC21/0041: The Inspector considered that the development has little harm on the Conservation Area. The appeal decision does not dispute the appropriateness or effectiveness of the policies and there is no evidence to suggest that the policies require immediate review.

Application Details	Reasons for Enforcement	Appeal Decision
Enforcement Notice EC24/0029 – breach of planning control: without planning permission making a material change of use of the land from woodland to a mixed use woodland and for residential	Requirement to permanently cease use of land for siting of a mobile home and caravan, permanently remove mobile home and caravan and restore land to former condition within 6 weeks of notice	CAS-03684-C2Y0L6 Dismissed and Notice Upheld 20/03/2025 Inspector concluded the 6 week period to comply with the enforcement notice was necessary to avoid prolonged public harm.

EC24/0029: The appeal relates to a period of time for compliance with the requirements of the Enforcement Notice and no consideration of Policy is required.

4. Sustainability Appraisal Monitoring

Sustainability Objective Progress

Sustainability Objective 1

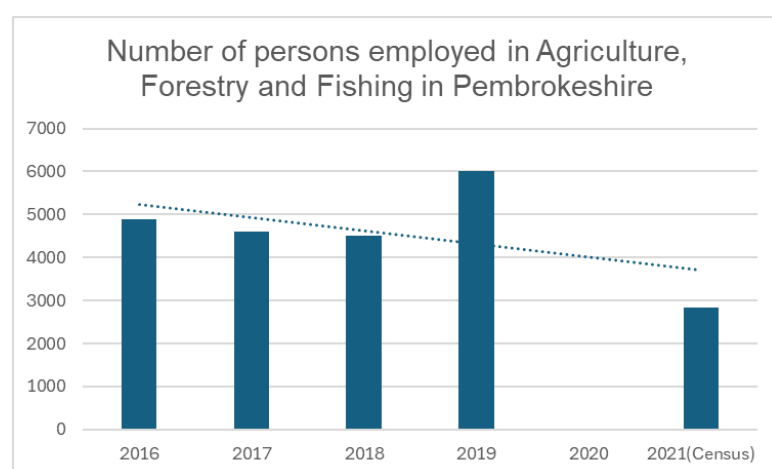
Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well-being.

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.

No updates to this dataset, provided on StatsWales, have been issued since the 2019 data was published. Data from the 2021 Census indicates that there has been a significant decline in the number of workers in agriculture, forestry and fishing.

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 maybe required for this objective.	-
2024 – 2025	Alternative indicator is required	An alternative indicator is required for this objective.	-



Workplace employment by industry and area ([Stats Wales](#)) – Data accessed 02/08/2023. TS060A – Industry, Census 2021 ([NOMIS](#))

Sustainability Objective 2





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

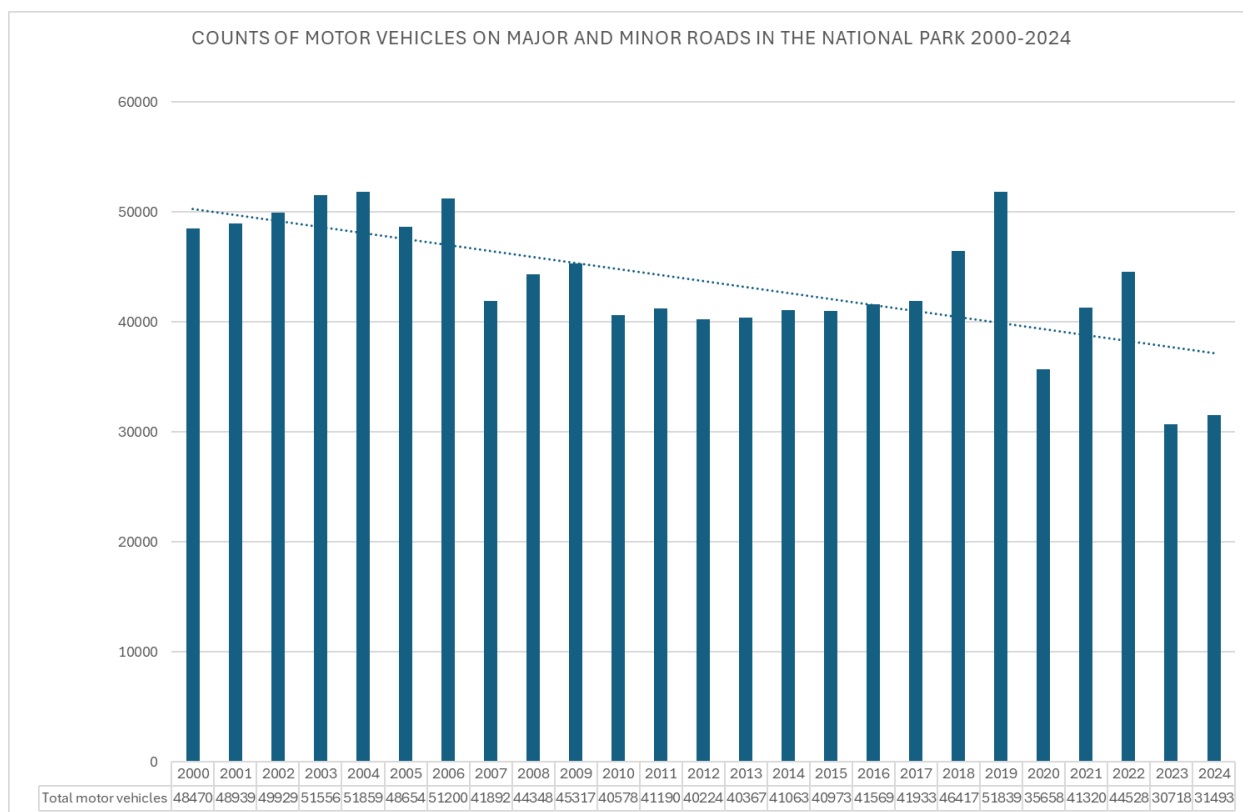
Commentary:

Traffic data from the Department for Transport (2000–2024) for locations within the National Park show that traffic levels were steady from 2010 to 2017, then peaked in 2018 and 2019. A sharp drop followed in 2020, likely due to the Covid-19 pandemic. Counts rose again in 2021 and 2022, but 2023 saw the lowest levels on record, with 13,810 fewer vehicles than the previous year. In 2024, traffic increased slightly by 775 vehicles. While the reasons for these recent fluctuations in traffic levels are not fully clear, they may reflect a decline in visitor numbers.

The Local Development Plan supports this objective by maintaining or improving community facilities and limiting development in areas with poor 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	
2023-2025	Continue Monitoring	Performance remains acceptable	



[Department for Transport Traffic Counts](#) – Data accessed 17/06/2025

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	
2024 – 2025	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.	
2024 - 2025	Continue Monitoring	Performance remains acceptable.	

Sustainability Objective 5

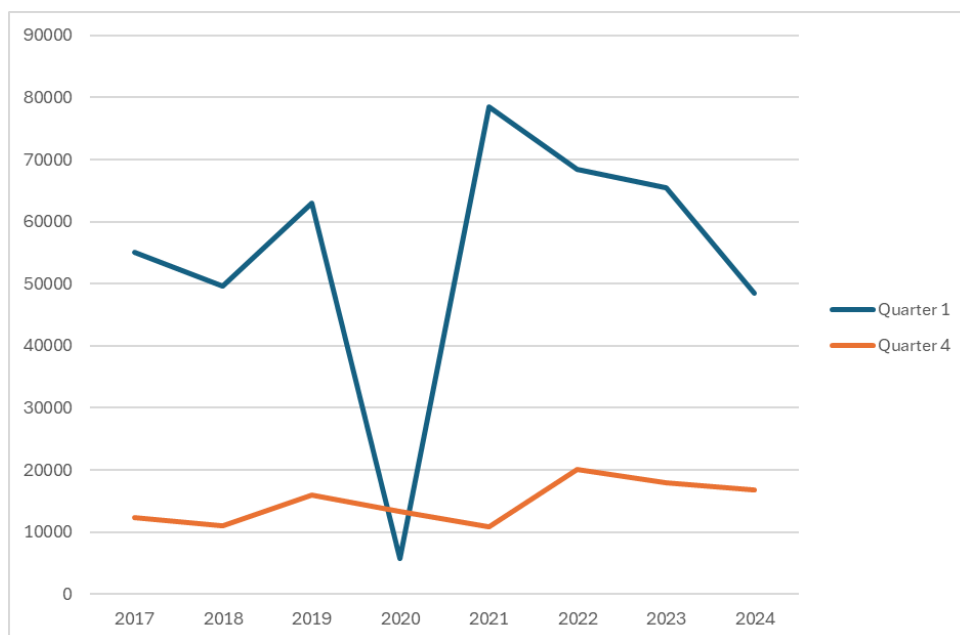
Increase the number of visitors using the National Park outside the peak visitor season.

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 inland 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. Between 2022 and 2024 a sharp decline in Q1 counts can be observed, indicating that peak season footpath use is declining. A decline in Q4 counts can also be observed but it is much more gradual.

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.	-
2024 - 2025	Continue Monitoring	The data indicates that the use of footpaths has continued to decline post Covid-19 pandemic, which may indicate a more general decline. More data is required.	-



Footpath Counter Data, Inland footpath network 2017 - 2024

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.

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.	
2024 – 2025	Continue Monitoring	Performance here is acceptable.	

Sustainability Objective 7





Reduce factors contributing to climate change

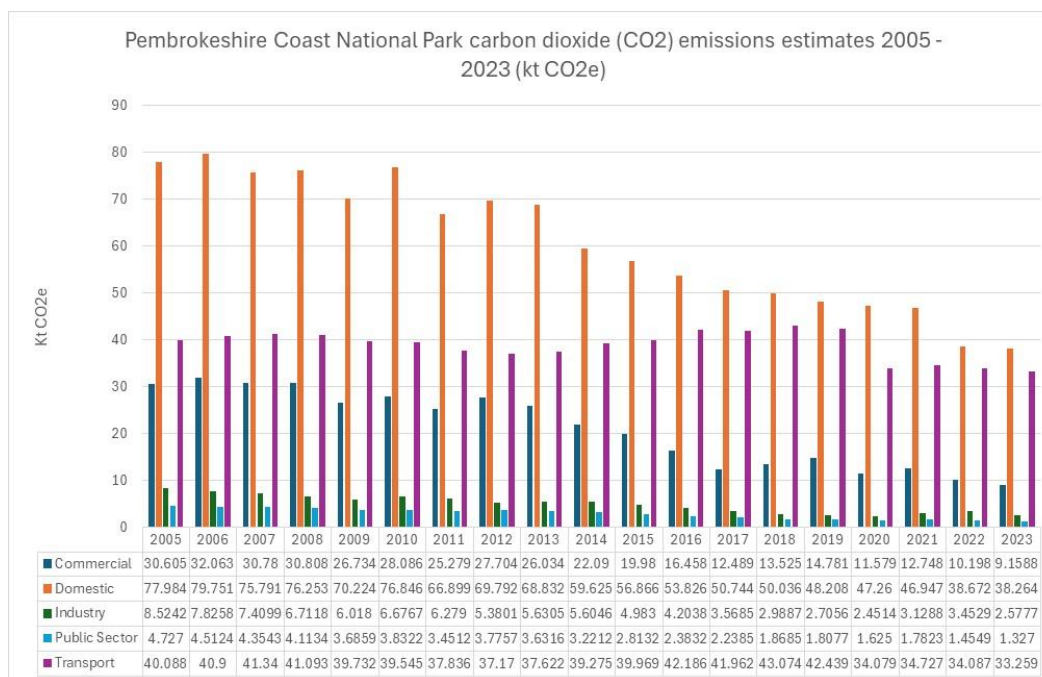
Commentary:

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 a decline since 2020.

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.	
2024 – 2025	Continue Monitoring	Performance remains acceptable.	



Emissions source: [UK local authority and regional greenhouse gas emissions statistics, 2005 to 2023 - GOV.UK](#) Data accessed 14/07/2025

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.	
2024 - 2025	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.	
2024 – 2025	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).

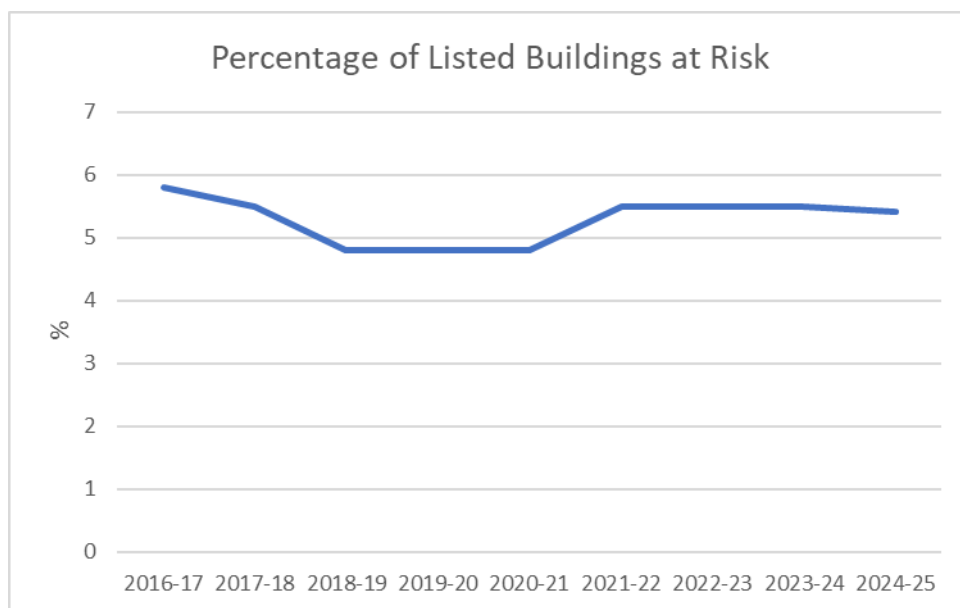
Secondly, the Local Development Plan will be able to contribute to the objective by helping to maintain and enhance culturally significant built environment and natural environment features.

Thirdly, by helping to protect the Welsh language.

In the 2022-2023 monitoring period, less than 10% of listed buildings (5.5%) are identified as being at any degree of risk. Due to resourcing, the number of listed buildings at risk was not surveyed for the 2023-2024 monitoring period. For the 2024-25 monitoring period 5.4% of listed buildings were found to be at risk, a small decrease on 2022-2023. There is also potential for Listed Buildings to have a change of use/conversion. Between the 1st April 2024 and 31st March 2025 one application for the change of use or conversion was 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.	
2024 – 2025	Continue Monitoring	Performance remains acceptable.	



Sustainability Objective 11

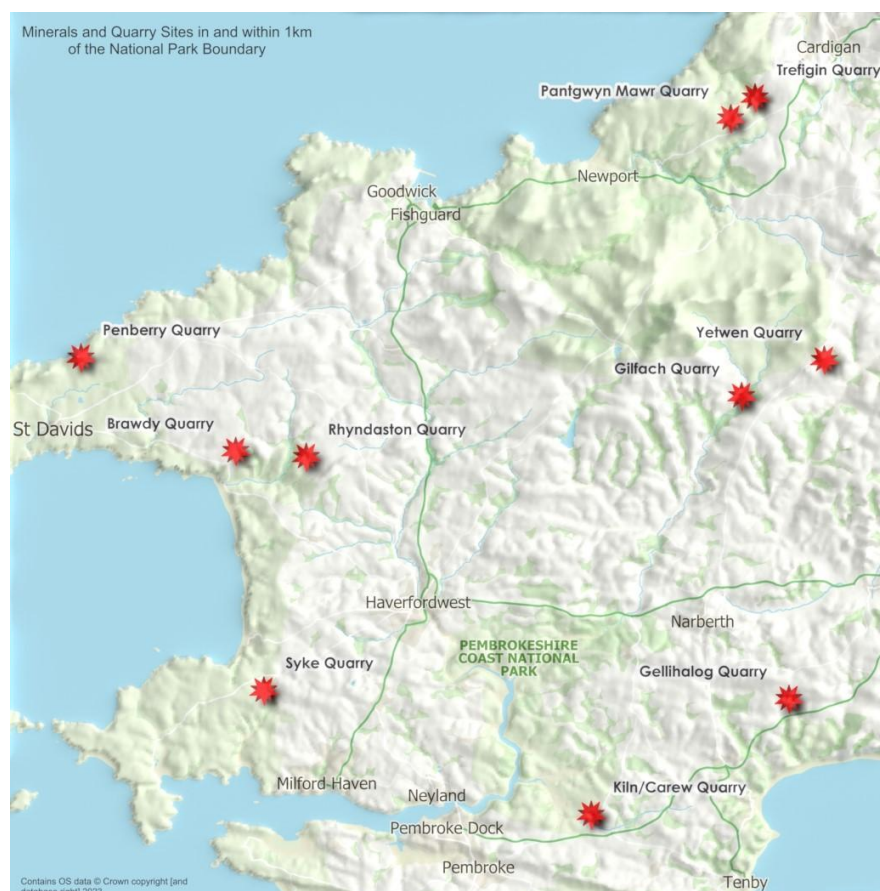
The adverse effects of minerals exploitation in the National Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.

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.	●
2024 - 2025	Continue Monitoring	Performance remains acceptable.	●



Sustainability Objective 12

Reduce the negative impacts of waste.





Commentary

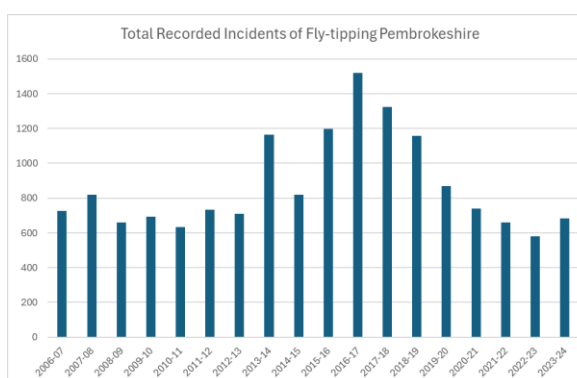
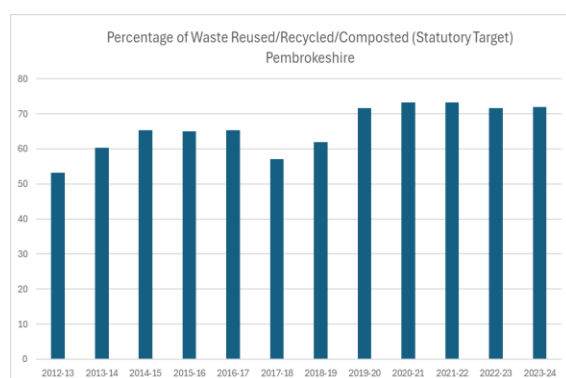
Policies 27 and 28 make allowances for waste management and composting facilities to be created that benefit communities in the national park subject to the location being appropriate. No applications contrary to these policies (see indicator 10) have been approved during this monitoring period.

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. However, a small increase in incidents between 2023 and 2024 can be seen in the latest data.

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.	
2024-2025	Continue Monitoring	Performance remains acceptable.	



Annual reuse/recycling/composting rates by local authority ([Stats Wales](#)) – Data Accessed 15/07/25





Recorded fly-tipping Incidents ([Stats Wales](#)) – Data accessed 15/07/25

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.	
2024 – 2025	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.

During the monitoring period 2024-25, 351 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.	
2024 - 2025	Continue Monitoring	Performance remains acceptable.	

Biodiversity Enhancements

Total to AMR Period

Increase this year

351
▲ 15

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

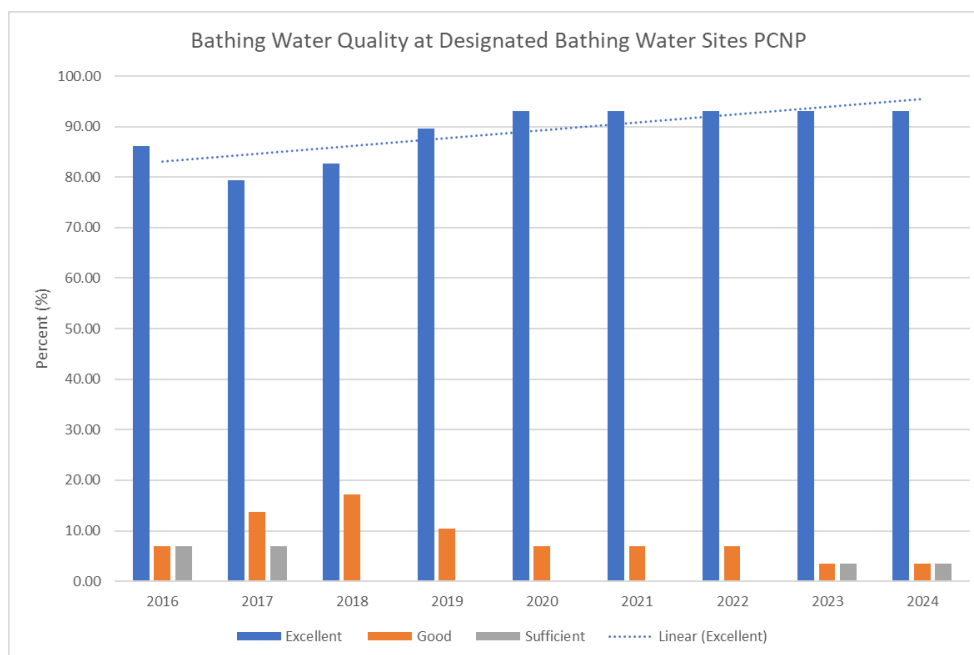
In January 2021 NRW published a report in which it presented its assessment of how much phosphorus there is in SAC rivers measured against revised water quality targets. The evidence review showed that over 60% of the water bodies assessed in SAC river catchments were failing to meet the revised water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

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.

No change in bathing water quality between 2024 and 2025, it remains predominantly excellent for designated beaches throughout the National Park.

Year	Action	Analysis	Overview
2021- 2022	Continue Monitoring	The strategy of the Plan is not affected by current issues with phosphorous elsewhere in Pembrokeshire.	
2022- 2023	Continue Monitoring	Situation remains the same as previous years monitoring.	
2023 – 2024	Continue Monitoring	Situation remains the same as previous years monitoring.	
2024 - 2025	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 25/06/25

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 2025 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 28% 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?*
<i>Marloes & St Brides</i>	31.9	<i>In</i>	<i>No</i>
<i>Dinas Cross</i>	29.5	<i>In</i>	<i>Yes</i>
<i>Saundersfoot</i>	28.6	<i>In</i>	<i>No</i>
<i>Pencaer</i>	28.4	<i>Partly</i>	<i>Yes</i>
<i>St Mary Out Liberty</i>	28.1	<i>Partly</i>	<i>No</i>

*Please see Policy 13 Development in Welsh Language Sensitive Areas

Second Homes on the Council Tax Database:

The table below lists the community council areas that are within or partly within the National Park where the proportion of homes that are paying the second homes premium, or are currently second homes under an exemption from the second home premium, exceeds 28%.

Community	Percent second homes	Within the National Park?	In Welsh Language Sensitive Area?*
<i>Dale</i>	30.30	<i>In</i>	<i>No</i>

*Please see Policy 13 Development in Welsh Language Sensitive Areas

The provision of community facilities

In terms of facilities available that qualify Centres as Rural Centres, there has been minimal change, with no significant loss or gain of qualifying facilities. While a full review was not carried out for the smaller settlements, it is noted that their facilities will be reviewed as part of the forthcoming evidence gathering process for the revised LDP3 settlement hierarchy. For the larger Centres, the range of facilities required to qualify these Centres as Tier 1 and Tier 2 Centres remain and the main findings for 2025 are that overall counts of community facilities for the main Centres are stable.

Schools and School Occupancy Levels

An update was provided by Pembrokeshire County Council in July 2025:

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

“Due to falling rolls over many years, several Pembrokeshire schools have significant surplus places and are well placed to be able to accommodate any additional pupil yield from new housing. The evidence for this was considered by Cabinet and Council in July 2024 and has since resulted in the formation of a cross party members’ School Modernisation Working Group to review individual schools and areas in greater detail. As a consequence of this, the Council has approved a period of statutory consultation on the closure of certain schools. Broadly speaking, the majority of schools, or where a significant part of schools’ catchment areas are located in the PCNPA area, fall far short of being at capacity. For example, with the exception of Ysgol Hafan y Mor, nearly all other schools in the Tenby area have sufficient capacity to accommodate pupil yield from housing and this is

the case both currently and looking ahead to the next 5-6 years. In the north east of the county, there are significant surplus places at St Dogmael's and Eglwysrwrw, but schools in the north west, notably those in the Fishguard and St David's areas are showing signs of population growth; for example, both Ysgol Bro Gwaun in Fishguard and Ysgol Penrhyn Dewi in St David's are currently oversubscribed, and in both of these cases, it is likely that the council would be requesting contributions arising from development. In the west and south west of the county, again there are sufficient school places to accommodate yield from new housing".

'Extract from the local development plan 2 background paper on 'principal residence and/or local connections policy'

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

- *The Authority contacted the Children and Schools Directorate at Pembrokeshire County Council and asked if there were any existing issues in the county, particularly those schools that have catchments within or partly within the National Park.*
- *The Authority has been advised that there are a number of schools which have catchments within the National Park area. A number of these have, and are likely to continue to have, sufficient spare places to be able to accommodate additional pupil yield from new housing, e.g. St Dogmael's CP, Ysgol Eglwysrwrw and Ysgol Llanychllwydog. However, there are other schools that have limited spare capacity and are likely to come under increased pressure from additional housing yield; such schools are Ysgol Penrhyn Dewi VA, Coastlands 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.²⁸
- 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.

²⁸ [National Park Authority Report: The implications of recent Welsh Government Legislative and Planning Policy Changes in relation to Second Homes and Short-term Lets](#)

- 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.²⁹

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](#)

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	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	5
Saundersfoot (Tier 2)	Land at Sandy Hill (HA2)	72	28 days	21 months	4 months			36	7	7	7	7	8	
Saundersfoot (Tier 2)	North of Whitlow (HA3)	54	28 days	11 months	7 months	5	22	31	18					
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	2 months			11						
Totals		302						78	51	33	33	33	33	36

APPENDIX 2 THE TIMING AND PHASING OF SITES WITH PLANNING PERMISSION

Settlement Tier	Site Name	Total Site Capacity	Completions	U/C	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	42	16	16						
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	11		28						
Lawrenny (Tier 3)	Adjacent Home Farm (NP/18/0622/FUL)	39				8	8	8	8	7	
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					7	7			
Totals		452	152	16	66	42	41	41	34	34	43

Report of Consultations

APPENDIX B

LDP 2 Annual Monitoring Report 3 (2023-2024)

Rep No.	Reference	Representation	Officer Response and Recommendation
1.	Newport Town Council	<p>We have found the analysis of AMR findings, the contextual changes since PCNPA LDP2 was adopted, and the review of LDP vision, objectives, strategy and policy of great interest.</p> <p>Newport Town Council will fully engage with the Review process if formally agreed by NPA and WG.</p>	Support from Newport Town Council is noted.
2.	The Mineral Products Association (MPA) Wales	<p>Sustainability Objective 11:</p> <p>We are extremely disappointed in the negative wording used by the NPA in this section of the AMR. This reflects the minerals industry in a wholly unnecessary and unjustified manner. Whilst we recognise the importance of National Parks in terms of landscape character, this wholly unjustified wording fails to properly reflect PPW. For example, Page 20 of PPW “Themes Collectively Contribute to Placemaking” identifies Minerals under “Productive & Enterprising Places”. The AMR should reflect the proximity principle and also the economic contribution of minerals. Society creates the need for minerals, not the industry itself and the minerals industry is a significant contributor to sustainable development. We suggest rewording Objective 11 to read:</p> <p><i>“The adverse effects of minerals exploitation development in the National Park decline from the present level are sustainably managed and the potential biodiversity and landscape gains of existing and former minerals sites are realised and delivered progressively.”</i></p>	<p>The Sustainability Objectives have been examined by an Independent Inspector during the LDP2 Examination process before the adoption of the Plan in 2020.</p> <p>It is considered that Sustainability Objective 11 reflects PPW paragraph 5.14.35 regarding minerals development in National Parks.</p> <p>The AMR provides a report on the performance of existing indicators and objectives, and it is not possible to change the wording of policies and/or indicators through the AMR process.</p> <p>Consideration and review of the sustainability objectives will be undertaken as part of the Local Development Plan revision commencing in 2025.</p>
3.	The Mineral Products Association (MPA) Wales	<p>We would also question how the impacts and effectiveness of Policies 21-26 are monitored and managed in the AMR, particularly development on Mineral Safeguarding Areas.</p>	<p>The Local Development Plan’s objectives and policies are monitored through the AMRs and monitor progress through key indicators and targets. The analysis is grouped under the overarching National Park Purposes and Duty and the six key priority areas.</p> <p>As stated in the Development Plans Manual, not all policies require monitoring, only those key to delivering the plan strategy and objectives. Policies 21 to 26 are considered where required on applications.</p>

