

Report of: Strategic Policy Manager

Subject: Local Development Plan 2 – Supplementary Planning Guidance

Decision Required: Yes

Recommendation:

The Authority is recommended to:

- a. Adopt following documents as supplementary planning guidance (SPG):
 - Conversions in the countryside SPG (Appendix A)
 - Replacement dwellings in the countryside SPG (Appendix B)
 - [Conservation and Enhancement of Dark Skies Good Practice Guidance](#) and explanation note (Appendix C)
 - Affordable Housing SPG (Appendix D)
- b. Note the Report of Consultation (Appendix E)

1. Key Messages

This report seeks approval of the four Supplementary Planning Guidance (SPG) documents (see Appendices). These will be used as a material consideration in planning decisions.

The draft SPG documents were subject to public consultation for an eight-week period from 10 October to 5 December 2025. Five responses were received via the online questionnaire and 14 responses were received by email which are summarised in the Report of Consultation (see Appendix E).

Officers have amended the SPGs to take account of the responses received. The following main changes have been made:

- The Conversion and Replacement Dwellings SPGs have been updated to adopt a more positive, design-led approach, placing greater emphasis on high-quality outcomes that respond appropriately to their context. The revised guidance strengthens expectations around lawful use, sustainability, visual impact and scale, clarifies the assessment of replacement dwellings, and confirms that proposals will be considered on their individual merits, including design quality, functional need and landscape impact.
- In relation to the Affordable Housing SPG respondents sought greater clarity, flexibility and alignment with national policy, particularly around affordable ownership and staircasing, exception sites and self-build which have been addressed through amendments to the SPG.

2. Background

Local Development Plan 2 (LDP 2) for the Pembrokeshire Coast National Park was adopted on 30 September 2020. Alongside Future Wales: The National Plan 2040, the adopted LDP 2 forms the development plan. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning decisions to be made in accordance with the development plan, unless material considerations indicate otherwise.

Supplementary Planning Guidance (SPG) can be prepared to supplement policies in the adopted LDP. SPG does not form part of the LDP, however, once adopted, SPG may form a material planning consideration in the determination of planning applications. SPG is required to be consistent with the adopted LDP and helps to provide consistency and clarity in planning decisions.

SPG has been prepared and consultation has been undertaken on the following four topics:

- **Conversions in the Countryside SPG**

The guidance supplements LDP 2, Policy 7 'Countryside' which allows for the conversion of appropriate buildings (criterion c). The SPG is structured around a series of questions and provides guidance on the suitability of buildings for conversion, appropriate uses and guidance on specific design aspects to ensure traditional character and features are retained.

- **Replacement dwellings in the countryside SPG**

LDP 2 does not contain a bespoke policy on replacement dwellings in the countryside, however, the strategic principles, particularly in Policy 29 Sustainable Design and Policy 31 Minimising Waste apply. The SPG provides criteria to assess contribution to landscape character, lawful residential use, the sustainability of demolition, and the appropriateness of any replacement dwelling in size, scale, and siting.

- **Conservation and Enhancement of Dark Skies SPG**

The Welsh Government's Good Practice Guidance on Conservation and Enhancement of Dark Skies provides practical advice on lighting design and assessments. The SPG supplements LDP2 Policies 8 Special Qualities, 9 Light Pollution, 14 Conservation and enhancement of the National Park, 29 Sustainable Design, and 30 Amenity.

- **Affordable Housing SPG**

The Authority has an adopted SPG on Affordable Housing, providing guidance on the implementation of LDP 2 Policies 47 (Housing Allocations or Land with Planning Permission), 48 (Affordable Housing – Strategy Policy), 49 (Affordable Housing Exception Sites), and 55 (Infrastructure Requirements). The SPG has been updated to provide additional clarity on Pembrokeshire’s latest Local Housing Market Assessment (2023), commuted sums, off-site affordable housing contributions, exception sites, and viability assessments.

3. Consultation

Public consultation on the draft SPG documents was conducted over an eight-week period from 10 October to 5 December 2025. An email or letter was circulated to contacts on the Local Development Plan Contact List which includes statutory consultees, targeted groups and members of the public. Members of the National Park Authority, local Councillors and Town, City and Community Councils were also notified.

Officers also raised awareness of the consultation at the Pembrokeshire Planning Agents forum held on 28 November. An online engagement session was held on Monday 10 November for any interested persons or organisations to attend. Four people attended online where officers gave presentations on the SPG documents and there was an opportunity for discussion and questions and answers. A meeting was held with officers from the Design Commission for Wales on 21 January to discuss their consultation response.

The draft SPG documents were available to download from the Authority’s website and could be viewed online at local libraries.

Five responses were received via the online questionnaire and 14 responses were received by email. A Report of Consultation (Appendix E) summarises the responses and provides an officer response. Key issues raised are summarised below:

- **Conversions in the Countryside and Replacement dwellings in the countryside SPG**
 - **Tone of guidance:** A number of respondents considered the tone of the two SPGs to be negative and overly restrictive. Both documents have been refined to adopt a more positive and proactive tone.
 - **Contemporary design –** Respondents, particularly in relation to the Replacement Dwellings SPG expressed concern that the guidance inhibited high-quality and innovative design. Amendments have been made to place greater weight on design quality, explicitly recognising that high-quality contemporary design may be acceptable where it demonstrates a clear design vision that is responsive to the landscape and the existing dwelling it replaces.
 - **Order of questions:** Respondents suggested that the questions in the Replacement Dwellings SPG should be reordered so that lawful residential use is addressed first, as this is a prerequisite for policy applicability. The questions have been reordered accordingly. In addition, the revised guidance strengthens expectations under Question 3 (“Is demolition of the existing

dwelling justified?”), requiring clearer justification for demolition over retention, including supporting evidence where necessary.

- **Visual impact:** It was suggested that the guidance should provide clearer direction on assessing visual impact, using the visual receptors identified in the National Park’s Landscape and Seascape SPG as a starting point. Relevant amendments have been made.
- **Scale of Replacement Dwellings:** A small number of respondents objected to prescriptive references to scale, including the use of terms such as “grandiose” and the 30% floorspace guideline, arguing instead for a flexible, case-by-case assessment based on proportionality, functional need and landscape impact. Additional clarification has been added, confirming that increases in floorspace are generally guided by a 30% benchmark, while emphasising that each proposal will be assessed on its individual merits including functional necessity and landscape impact.

- **Conservation and Enhancement of Dark Skies SPG**

One respondent had written to the Authority raised concern about the need for an audit of street lighting within the National Park. The comments raise issues beyond the scope of the SPG and it is considered that no amendments are necessary.

- **Affordable Housing SPG**

Overall, respondents sought greater clarity, flexibility and alignment with national policy, particularly around affordable ownership, exception sites and self-build which have been addressed through amendments to the SPG (see Appendices D and E). Some of the main issues are outlined below and a detailed summary and response is provided in Appendix E.

- **Affordable ownership and staircasing:** The most significant concern related to guidance restricting staircasing to 100% ownership, which respondents considered too restrictive and conflicts with national policy. The wording has been amended to clarify that opportunities for staircasing will be limited and will require the identification of a replacement affordable home to be provided in the same settlement. Where there is evidence of affordable housing need within the community council area or adjoining community council in the National Park this may be acceptable in some circumstances. The replacement dwelling must also be of a comparable build standard (paragraphs 2.12 and 2.13).
- **Exception sites and ownership tenures:** Respondents raised concerns regarding the treatment of mortgagee in possession clauses and whether alternative mechanisms could be used to secure affordability on exception sites. Paragraph 6.17 has been amended to clarify that ownership tenures on exception sites must ensure appropriate mechanisms are in place for the affordable housing restrictions to be retained in perpetuity.
- **Self-build:** Several respondents argued the draft SPG discouraged self-build, especially on exception sites. The wording has been amended to confirm that

self-build may be appropriate on exception sites where secure mechanisms are in place to retain the affordable housing in perpetuity (paragraph 2.14).

- **Community-led housing:** One respondent supported greater recognition for community-led housing as a mechanism for delivering affordable housing. Additional text has been included at paragraphs 2.15-2.17.
- **Local Housing Market Assessment:** Some response considered the LHMA was overly strategic and did not adequately reflect local or individual housing needs. Clarity has been added to paragraph 4.1, identifying the LHMA as the primary source of evidence of affordable housing need, while paragraph 4.6 confirms that additional evidence of local housing need may be submitted.

4. Strategic Policy Context

The information and recommendations contained in this report are consistent with the Authority's statutory purposes and its approved strategic policy context. The SPG documents will provide additional guidance on specific topics to supplement policy in the adopted LDP 2. Whilst only policies in the adopted LDP and Future Wales have special status in the determination of planning applications, (i.e. for the purpose of any determination under the Planning Acts, the determination must be made in accordance with the Plan unless material considerations indicate otherwise), SPG may be taken into account as a material planning consideration.

The National Park Partnership Plan 2025-2029 identifies a list of the National Park's special qualities. Conservation and enhancement of the special qualities of the National Park is a strategic aim of planning policy in the adopted LDP 2 (policy 8). The table below shows how the SPG topic areas align with adopted LDP 2 and Partnership Plan policies.

SPG Topic	LDP 2 relevant policies	Partnership Plan themes and relevant policies
Conversion	Policy 7 'Countryside'	Themes: Conservation – Conserving and enhancing natural beauty and wildlife; Cultural Heritage and Connection. L1: Conserve and enhance National Park landscapes and seascapes. H1: Conserve and enhance landscapes of historic interest, Conservation Areas, Historic Parks and Gardens, Scheduled Monuments, buildings of interest, non-designated heritage assets and their settings.
Replacement Dwellings	Policy 8 Special Qualities Policy 14 Conservation and Enhancement of the Pembrokeshire Coast National Park	Themes: Conservation – Conserving and enhancing natural beauty and wildlife; Cultural Heritage and Connection. L1: Conserve and enhance National Park landscapes and seascapes.

	Policy 29 Sustainable Design Policy 31 Minimising Waste	H1: Conserve and enhance landscapes of historic interest, Conservation Areas, Historic Parks and Gardens, Scheduled Monuments, buildings of interest, non-designated heritage assets and their settings.
Dark Skies	Policy 8 Special Qualities Policy 14 Conservation and enhancement of the Pembrokeshire Coast National Park Policy 9 Light Pollution Policy 10 Sites and Species of European Importance Policy 11 Nationally Protected Sites and Species Policy 29 Sustainable Design Policy 30 Amenity	Theme: Conservation – Conserving and enhancing natural beauty and wildlife; Policy L2: Protect and enhance dark night skies
Affordable Housing	Policy 47 Housing Allocations or Land with Planning Permission Policy 48 Affordable Housing (Strategy Policy) Policy 49 Affordable Housing Exception Sites Policy 55 Infrastructure Requirements	Theme: Communities – Landscapes for lives and livelihoods Policy E1: Foster socio-economic wellbeing of National Park communities (in pursuit of National Park purposes).

5. Financial Considerations

The Authority's Strategic Policy team have prepared the SPG documents. A consultant was engaged to review the drafting of the Affordable Housing SPG and provide guidance on affordable housing viability. The Welsh translation and consultation was undertaken out of the current budget.

6. Risk and Compliance Considerations

The SPG documents when adopted will provide a robust position regarding planning requirements in line with the adopted Local Development Plan 2, Future Wales and national planning policy. The proposed SPG documents provide guidance to developers on specific planning issues experienced in the National Park and will ensure the special qualities of the National Park are protected, particularly regarding the environment and landscape and support communities.

7. Impact on our Public Sector Duties

7.1 Integrated Assessment Completed: No

An Integrated Impact Assessment screening has been completed for the SPG documents and concluded an IIA is not required (see NPA Report 33/25). The SPG documents do not revise or amend any part or policies within the adopted LDP 2 but provide additional guidance to aid applicants and planning officers. A full Sustainability Appraisal incorporating Strategic Environmental Assessment was undertaken for LDP 2 to assess the environmental, social and economic effects of the plan.

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 relation between different communities. This means that, in the formative stages of our policies, procedure, practice or guidelines, the Authority needs to take into account what impact its decisions will have on people who are protected under the Equality Act 2010 (people who share a protected characteristic of age, sex, race, disability, sexual orientation, gender reassignment, pregnancy and maternity, and religion or belief). LDP2's policies have been subject to an Equalities Impact Assessment. The SPG documents support the Plan's policies.

The draft documents were available for public consultation which provided an opportunity for people from protected groups to comment on the draft guidance documents.

7.3 Welsh Language Impacts

The consultation exercise was carried out in accordance with the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards Regulations (No.1) 2015 with the draft SPGs made available bilingually. A questionnaire invited comments on the likely effects on the Welsh language and whether proposals could be formulated or changed to have positive effects on the Welsh language or mitigate negative effects.

One respondent to the Affordable Housing SPG raised concerns that restricting affordable ownership could force local people to leave rural communities, potentially harming the Welsh language. Amendments have been made to ensure that affordable housing ownership is not prevented, but the guidance seeks to ensure affordable housing is provided to meet local needs, including the needs of Welsh speakers and ensure that suitable mechanisms are in place for the retention of affordable housing or its replacement for future generations.

The SPGs supplement policies in the adopted LDP 2, which underwent a sustainability appraisal that included Welsh Language as an assessment criterion.

7.4 Section 6 Biodiversity Duty and Carbon Emission Impacts

Planning Authorities must maintain and enhance biodiversity and promote the resilience of ecosystems through the planning process as part of compliance with the Environment (Wales) Act 2016. Biodiversity enhancements which are proportionate to the scale and nature of development must be provided to ensure a net benefit for

biodiversity is delivered. Planning Policy Wales states that a Green Infrastructure Statement should be provided with all planning applications to provide an assessment of what impact a planning application will have to existing biodiversity and describe what and how green infrastructure will be incorporated into the proposal.

The SPG on Conversions in the Countryside provides a section on biodiversity and the retention of hedgerows and trees to enhance the historic character of the landscape. An ecological survey, including a protected species survey, will be required prior to the submission of an application for the conversion of a building in the countryside.

The SPG on replacement dwellings provides guidance on whether demolition of an existing dwelling is justified in sustainability terms. When a building is demolished and a new one is put in its place, the emissions locked into the original building are wasted and the new building's material manufacturing and construction processes create new emissions. The guidance encourages the retrofit and the demonstration that a dwelling is not capable of retention through renovation through the submission of a structural report.

The Conservation and Enhancement of Dark Skies guidance seeks to achieve appropriate lighting design which can result in improved outcomes for energy and carbon saving and protect biodiversity.

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

The SPG documents align with and contribute to the Well-being Goals for Wales:

- A prosperous Wales – promotes development while recognising environmental limits and encouraging efficient resource use.
- A resilient Wales – maintains and enhances biodiversity and ensures development provides a net benefit.
- A healthier Wales - supports physical and mental well-being, including through the promotion of dark skies.
- A more equal Wales – the Affordable Housing SPG seeks to ensure access to appropriate housing.
- A Wales of cohesive communities – promotes safe, viable, and well-connected communities.
- A Wales of vibrant culture and thriving Welsh language – protects culture, heritage, and the Welsh language.
- A globally responsible Wales – contributes positively to global well-being and protects finite resources.

Sustainable Development Principles (five ways of working):

- Long Term – balances short-term needs while protecting the National Park's long-term interests.
- Prevention – seeks to prevent problems or mitigate existing issues.
- Integration – aligns with LDP 2 and the Partnership Plan objectives.

- Collaboration – prepared with Development Management input, planning agents, and consultation engagement.
- Involvement – stakeholders and the public were engaged to help shape the guidance.

8. Conclusion

Members are recommended to approve the adoption the four Supplementary Planning Guidance documents (Appendices A to D).

9. List Background Documentation:

Appendix A: Conversions in the Countryside SPG

Appendix B: Replacement dwellings in the countryside SPG

Appendix C: Explanation note of Conservation and Enhancement of Dark Skies
Good Practice Guidance

Appendix D: Affordable Housing SPG

Appendix E: Report of Consultation

(For further information please contact Emma Gladstone,
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Parc Cenedlaethol Arfordir Penfro Pembrokeshire Coast National Park



Pembrokeshire Coast National Park Local Development Plan 2

Conversions in the Countryside

Supplementary Planning Guidance ~~Draft~~

Consultation 10 October to 5 December 2025~~October 2025~~
Adoption **XXX**

This item is also available in Welsh/ Mae'r eitem hon ar gael yn Gymraeg hefyd

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Introduction

1. In September 2020 the Pembrokeshire Coast National Park Local Development Plan 2 (end date 2031) was adopted by Pembrokeshire Coast National Park Authority.
2. While only the policies in the adopted development plans have special status in deciding planning applications, (i.e. for the purpose of any determination under the Planning Acts, the determination must be made in accordance with the relevant Plan unless material considerations indicate otherwise), Supplementary Planning Guidance can be taken into account as a material planning consideration provided it is derived from and is consistent with the adopted development plan and has itself been the subject of consultation, which will carry more weight.
3. This Supplementary Planning Guidance provides detailed information regarding the way in which Development Plan policies will be applied to planning applications for the conversion of buildings. The Supplementary Planning Guidance has been drafted to ensure it dovetails with the National Park Authority's Supplementary Planning Guidance documents on Sustainable Design and Development, Landscape and Seascape Character, and Affordable Housing, Biodiversity.¹

The Status of Supplementary Planning Guidance

4. Supplementary Planning Guidance (SPG) may be a material planning consideration during the process of assessing and determining planning applications. Welsh Government and the Planning and Environment Decisions Wales (PEDW) will place considerable weight on supplementary planning guidance that stem from, and are consistent with, a development plan. SPG does not introduce any new planning policies.
5. In accordance with Welsh Government advice, the SPG will be subject of a public consultation and a resolution to adopt by the National Park Authority.

¹ <https://www.pembrokeshirecoast.wales/planning/planning-policy/local-development-plan-2/supplementary-planning-guidance-ldp2/>

The Policy Context

Future Wales 2040

6. Under planning legislation, the planning policies for every area are contained within the 'development plan'. Future Wales 2040 sets out a spatial strategy *which 'by focusing large scale growth on the urban areas, development pressures can be channelled away from the countryside.'*²

Planning Policy Wales Edition 12 February 2024

7. *'3.60 Development in the countryside should be located within and adjoining those settlements where it can best be accommodated in terms of infrastructure, access, habitat and landscape conservation. ... However, new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled. All new development should be of a scale and design that respects the character of the surrounding area.'*
8. *'5.6.8 ... They (planning authorities) should also adopt a positive approach to the conversion of rural buildings for business re-use.'*

Technical Advice Note 23 Economic Development February 2014

9. *'3.2.1 The re-use and adaptation of existing rural buildings has an important role in meeting the needs of rural areas for commercial and industrial development, and tourism, sport and recreation. In recognising this, local planning authorities are expected to adopt a positive approach to the conversion of rural buildings for business re-use, especially those buildings located within or adjoining farm building complexes..'*

Pembrokeshire Coast National Park Local Development Plan 2 September 2020

10. The Pembrokeshire Coast National Park Local Development Plan 2 was adopted in September 2020. The spatial strategy of the Local Development Plan 2 channels development towards towns and villages.
11. **Policy 7 (Countryside)** of the Local Development Plan 2 strictly controls development in the countryside. Policy 7c) does however allow for the **conversion of appropriate buildings** to a range of uses with market housing

² Page 64, second paragraph. Future Wales The National Plan 2040
<https://www.gov.wales/sites/default/files/publications/2021-02/future-wales-the-national-plan-2040.pdf>

being given priority in residential conversions.

12. Paragraph 3.2.2 of Technical Advice Note 23, Economic Development February 2014 provides for the option of prioritising employment-related uses in conversions. This Authority has attempted to prioritise employment-related uses under the Joint Unitary Development Plan and found this difficult to operate. Beyond holiday letting there is little demand for employment related activities.

13. The role of this guidance is to ensure that such proposals are subject to careful consideration to ensure that they comply with the policies of the Local Development Plan 2.

~~14. The conversion of outbuildings in the countryside more recently has had particular focus in terms of applications seeking to introduce significant change to the original building undermining the character of the building, which is the reason its retention is sought in the first place. Recent proposals for the conversion of outbuildings in the countryside have often sought a greater degree of change to the original buildings form and fabric, highlighting the importance of carefully considering how such alterations may influence the character that justifies their retention.~~ Policy 7 c) (Countryside) allows for the conversion of appropriate buildings. Paragraph 4.43 to 4.47 of the Local Development Plan 2 describes in detail what the expectations are. Policy 14 (Conservation and enhancement of the Pembrokeshire Coast National Park) focuses on the protection of the National Park qualities, its special landscape character including the need to protect against losing or failing to incorporate important traditional features.

15. The conversion of rural buildings presents a unique opportunity to secure their long-term future. It's recognised that the National Park's character is not static and has been shaped by a history of functional evolution as a living, working landscape. Whilst high value is placed on the preservation of traditional features, the Park will need to remain open to high quality, contemporary design, ensuring that these structures remain functional assets within the landscape rather than falling into decay. The guidance seeks to manage this evolution, balancing positive change with the statutory duty to conserve and enhance the special qualities and locally distinctive character of the National Park.

~~13.~~16. The following guidance has been split into three sub-sections:

- **Section A: Key Questions:** Fundamental matters that need to be addressed to secure a successful planning proposal.
- **Section B: General Matters:** Proposals for the conversion of rural

buildings to alternative uses will also need to satisfy the other relevant Local Development Plan 2 policies such as those relating to access arrangements and parking provision, impacts on neighbouring amenity, effects on protected habitats or species, and so on.

- **Section C: Useful Contacts**

Section A Key Questions

- A.1 Below are key questions to consider in relation to proposals for the conversion of buildings in the countryside. Further detail guidance is then provided in relation to these key questions.
- A.2 It should be noted that actions under individual questions will have knock on implications for responding to other questions when developing proposals. A comprehensive approach to proposals is required.

Is the building an appropriate building for conversion?

Why is the planning authority asking this question?	National Policy Reference	Local Planning Policy Reference
<p><u>A key objective of National Policy is to promote the suitable re-use of buildings to minimise land take on greenfield sites.</u></p> <p>National Planning Policy requires the converted buildings to be in keeping with their surroundings. It also requires that this be done without extensive alteration or reconstruction.</p>	<p>Technical Advice Note 23 Paragraph 3.2.1 bullet 3: <i>'their form, bulk and general design are in keeping with their surroundings;</i></p>	<p>Policy 7 (Countryside) <i>'Outside the identified Centres is countryside where development must be strictly controlled.'</i></p> <p>...</p> <p>Policy '7c) <i>'it constitutes the conversion of appropriate buildings to a range of uses...'</i></p> <p>Policy 7 (Countryside) Reasoned Justification paragraph 4.45 and 4.46.</p> <p>Policy 14 (Conservation and enhancement of the Pembrokeshire Coast National Park) <i>does not permit development where this would have an unacceptable adverse effect on the qualities and special landscape and seascape character of the National Park including locally distinctive characteristics by...a) causing visual intrusion...c)failing to harmonise with, or enhance the landform, landscape and seascape character of the National Park...'</i></p>

Notes: Appropriate buildings in the countryside would include agricultural buildings, former churches and chapels, and dwellings where the residential use is now lost.

Buildings are required to make a positive contribution to the character of the area through their intrinsic architectural merit or their setting in the landscape or historical importance (see section below)

Their interest and charm stems from an appreciation of the functional requirement of the building, their layout and proportions, the type of building materials used (including those constructed of stone, clom and slate), and their display of local building methods and skills.

A building may not be appropriate for conversion to a range of uses. Some uses are more appropriate in certain types of buildings.

Building's Character

A.3 The character of many buildings across the National Park relies on simple and solid proportions, rural buildings characterised by locally available building materials. Change came in the later nineteenth century when slate from North Wales was increasingly used and during the early part of the twentieth century when corrugated steel and some brick was used. The vast majority of rural buildings are not listed and despite some loss of detail, most retain their form well. These seemingly 'ordinary' buildings give the National Park its special character in terms of built form.

A.4 The form, bulk, design and materials used in some buildings can make them visually intrusive in the landscape. However, it is possible that in exceptional circumstances a modern utilitarian building may make a positive and important contribution to rural employment opportunities without detracting from the appearance of the landscape. Residential or serviced accommodation or holiday accommodation uses would be precluded in proposals for such buildings.

~~A.5 — Generally, the conversion of buildings that are obtrusively located within the landscape or otherwise poorly related to their surroundings will be resisted, unless the building is of clear heritage or architectural significance. However, proposals that employ high-quality, innovative design solutions to adapt buildings that are less typical of the local vernacular but nevertheless have historical merit (see 'Buildings of Historic Importance' below), where this approach helps reconcile historic value with the practical requirements of modern use, will also be considered on their own merits. nerally, the conversion of building(s) that are obtrusively located in the — landscape or otherwise not in keeping with their surroundings will not be encouraged unless they are of significant heritage and architectural merit. However, exceptional consideration will be given to buildings which justify their retention for historic reasons. In these instances, the applicant will need to evidence the historical value of the building. This could be particularly relevant for buildings less typical of the area but nevertheless have historical merit — see 'Buildings of Historic Importance' below.~~

~~A.6 —~~

~~A.7~~[A.5](#)

Is the building capable of conversion?

Why is the planning authority asking this question?	National Policy Reference	Local Planning Policy Reference
<p>National Planning Policy requires this in countryside locations where development is strictly controlled.</p> <p><u>The extent of alteration required to facilitate reuse will be a key consideration in assessing the suitability of a building for conversion. Only buildings that can be reused without significant alteration should be considered for conversion.</u></p>	<p>Technical Advice Note 23 Economic Development paragraph 3.2.1: <i>...if the buildings are in the open countryside, they are capable of conversion without major or complete reconstruction;</i></p> <p>3.2.3: If the existing building is unsuitable for conversion without extensive alteration, rebuilding or extension, or if the creation of a residential curtilage would have a harmful effect on the character of the countryside, the same considerations relating to new house building in the open countryside will apply.</p>	<p>Policy 7 (Countryside) <i>'Outside the identified Centres is countryside where development must be strictly controlled.'</i></p> <p>...</p> <p>Policy 7c) <i>'it constitutes the conversion of appropriate buildings to a range of uses...'</i></p>

Notes: The level of alteration required to enable reuse will be an important factor in determining the suitability of a building for conversion, with proposals involving major alteration or complete reconstruction being contrary to national planning policy. Buildings requiring major or complete reconstruction or alteration will be refused planning permission as this would be contrary to national planning policy. *'...new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled.'* Paragraph 3.60 Planning Policy Wales Edition 12 February 2024.

See paragraph below on 'Structure.' See paragraph 'Extensions' below.

Structure - Structural Report

A.8A.6 Any building in the countryside proposed for conversion should be a permanent building of sound construction. Developments that entail significant re-building work will not be permitted as this would be tantamount to constructing a new building. Exceptions may include Listed Buildings or buildings within Conservation Areas where the **presumption** is to retain them in good repair and use. The walls should be structurally sound and should be eaves level in height. Any building in the countryside that is in such a dilapidated condition where substantial parts of it would have to be replaced, or that the building would have to be completely replaced, will not be acceptable. This will ensure that the special character and appearance of the building will not be damaged.

A.9A.7 Any application for conversion to residential should include a 'Structural Report' to prove that it is possible to convert the building without major or complete reconstruction. It will be necessary to ensure that the report is undertaken by a qualified person, such as a Structural Engineer. The information submitted should be in the form of a report. Where appropriate, the use of drawings and photographs are encouraged to show the building's condition.

A.10A.8 As the condition of buildings left unused can change significantly over time, it will be necessary to ensure that the Structural Report is undertaken within a period of 3 months of the planning application submission date.

A.11A.9 Any Structural Report should be comprehensive and thorough and include information about the condition of the building and its suitability for the proposed use. Considerations might include the overall size and layout of the building, the amount and disposition of openings, and the relationship with any adjacent buildings. A report that is only based on a visual inspection of the building will not be ~~acceptable~~sufficient.

A.12A.10 During the construction work it will be necessary to ensure that appropriate measures are taken to safeguard/support the building's structure. A condition will be attached to the permission stating the need for the work necessary to support the structure of the building to be undertaken prior to undertaking any structural work.

A.13A.11 In instances where the building that is the subject of conversion falls down during the process of restoration, the work of converting the building should end until discussions take place with the National Park Authority. ~~—~~The fact that sections of the building have fallen may mean that the original planning permission given is no longer valid. In such circumstances, a new planning application will need to be submitted, and it may be that the proposal does not comply with the principle of the relevant policies within Local Development Plan 2. When undertaking restoration work, if sections of the original building are found to be structurally unsound and will therefore prevent the restoration work, then it should be ensured that a discussion takes place with the National Park Authority. Sections should not intentionally be demolished and then rebuilt without firstly receiving the permission to undertake the work. If sections were to be demolished without permission this would invalidate any prior consent.

What use is the building going to be converted to?

Why is the planning authority asking this question?	National Policy Reference	Local Planning Policy Reference
<p>Local Development Plan policy prescribes the types of uses that buildings can be converted to. It also has a specific objective regarding prioritising the re-use of buildings for uses which contribute most to sustaining local communities.</p> <p>Adapting a building for a specific use for which it is not suitable can have a detrimental impact on the character of the building, and its contribution to the character of the local area.</p>	<p>Technical Advice Note 23: 3.2.1 Bullet 6: <i>conversion does not result in unacceptable impacts upon the structure, form, character or setting where the building is of historic and / or architectural interest.</i></p> <p>3.2.3: <i>If the existing building is unsuitable for conversion without extensive alteration, rebuilding or extension, or if the creation of a residential curtilage would have a harmful effect on the character of the countryside, the same considerations relating to new house building in the open countryside will apply.</i></p>	<p>Policy 7 (Countryside) c) requires it constitutes the conversion of appropriate buildings to a range of uses with market housing being given priority in residential conversions.</p> <p>Policy 14 (Conservation and enhancement of the Pembrokeshire Coast National Park) focuses on the protection of the National Park qualities, its special landscape character including the need to protect against losing or failing to incorporate important traditional features.</p>

Notes: The policy aims to encourage reuse of buildings for employment and employment related activities (such as farm shops, tourism attractions, serviced accommodation and recreational activities).

While traditional buildings are prioritised in employment conversions, LDP 2 paragraph 4.46 notes that it is possible in exceptional circumstances that a modern utilitarian building may make a positive and important contribution to rural employment opportunities without detracting from the appearance of the landscape.

Employment-related uses could include residential conversion as a subordinate part of a scheme). Residential use would include market housing (full-time residential with no occupancy controls) and self-catering. In residential proposals market housing will be given priority over self-catering to assist with the delivery of housing to meet local needs as per Policy 40 (Affordable Housing).

The strategy of Local Development Plan 2 is to prioritise the delivery of affordable housing in residential proposals. Policy 40 (Self-Catering Development), paragraph 4.20 also advises that given the large number of holiday properties currently in the National Park the Authority will seek to prioritise the provision of affordable housing over self-catering. Off-site affordable housing contributions will be sought on market dwellings. Please also see Section B: General Matters Use Classes Order Amendment 2022.

See also Question: *Is the building suitable for the specific use?* For example, while residential conversions are a means of sustaining the Park's living landscape, such proposals often require a particularly thoughtful approach to design. As some traditional buildings were not originally designed for domestic use, the challenge is to integrate modern living requirements without losing the building's unique character. Therefore, creative, high-quality solutions that work *with* the building's existing structure are often a more suitable alternative over extensive alteration and re-building residential conversions can often have detrimental effects on the fabric and character of traditional historic buildings because such buildings are often unsuitable for conversion to residential use without extensive alteration, re-building and/or extension.

~~A.14A.12~~ ~~_____ If the building is only Where planning permission for holiday accommodation is granted then appropriate planning controls need to be put in place to ensure it is occupied in accordance with the condition. Where planning permission for holiday accommodation is granted this will be subject to conditions and/or a legal agreement to restrict the occupation of the building to holiday use preventing all year round occupancy by the same occupant.~~

A.15A.13 _____ Where planning permission for holiday accommodation is granted then appropriate planning controls need to be put in place to ensure it is occupied in accordance with the condition. Where planning permission for holiday accommodation is granted this will be subject to conditions and/or a legal agreement to restrict the occupation of the building to holiday use preventing all year round occupancy by the same occupant.

Is the building suitable for the specific use?

Why is the planning authority asking this question?	National Policy Reference	Local Planning Policy Reference
<p>One of the benefits of allowing the conversion of rural buildings to alternative uses is to ensure the survival of traditional rural buildings which add to the character and charm of the rural landscape. Therefore, in such cases, it is necessary to ensure that alternative uses require a minimum of changes to the fabric of the building and its setting in order to retain its character and visual amenity in the rural landscape.</p> <p>National Policy requires that buildings are capable of conversion without significant reconstruction.</p> <p>National Policy also requires conversion to not result in unacceptable impacts upon the structure, form, character or setting where the building is of historic and / or architectural interest.</p>	<p>Technical Advice Note 23 Economic Development paragraph 3.2.1: <i>'... if the buildings are in the open countryside, they are capable of conversion without major or complete reconstruction; conversion does not result in unacceptable impacts upon the structure, form, character or setting where the building is of historic and / or architectural interest.'</i></p> <p>Technical Advice Note (TAN) 12 Design (2016) emphasises the value of good design in all developments, and provides advice and information on the design process.</p> <p>In respect of the conversion of rural buildings, TAN 12 5.8.4 highlights the importance of their sensitive treatment so to ensure that the character of such buildings and surroundings is maintained: <i>"Character retention will often involve the least amount of change possible to external appearance. Solidity and simplicity in design and relationship of built form with landscape provide the distinctive character of many Welsh rural areas."</i></p>	<p>4.45 Conversion must not result in an unacceptable adverse effect upon the structure, form, character or setting of the building.</p>

Notes: Buildings of insufficient size to accommodate an acceptable alternative use without significant extension alteration or extension would not be suitable for the specific use.

A.16A.14 Activities relating to low-key uses such as offices, studios, light industrial workshops or similar are likely to be most suitable if they can operate without creating high levels of noise, pollution or vehicle movements.

A.15 Residential conversions remain a popular and effective way to secure the future of traditional rural buildings, ensuring they remain a functional part of the living landscape. Adapting these structures for modern living, incorporating natural light, internal partitions, and essential services, presents a unique architectural challenge. The Authority will support design solutions that work harmoniously with the building's original fabric. However, the success of a conversion will depend on the original building's form being preserved as the core of the development. Loss of this original identity will be resisted. ~~There is little doubt that conversion for residential purposes remains the most popular option for the re-use of traditional rural buildings. However, it is also the most difficult and challenging – as well as potentially the most harmful. This is due to the inherent need to adapt the physical fabric of the building to provide habitable accommodation through internal subdivisions, the creation of upper floors, attendant openings in walls for windows and doors and the need for domestic flues and other pipe work.~~

A.17A.16 Externally, the setting of the building can also be compromised by the addition of domestic/urban paraphernalia. Domestic landscaping, garden sheds, greenhouses, patios and boundary treatments can all jeopardise the character of a building and undermine its rural setting.

A.17 The conversion of traditional rural buildings is guided on the one hand by the original structure and materials of the building and on the other the requirements and adaptation needs for an altered use. There is a balance to be struck between facilitating the practical requirements of a new use and maintaining the special character of the building. Reconciling the two in a mutually acceptable way can be a difficult challenge and require a combination of thoughtful design and in some cases innovative solutions.

A.18 Simplicity in approach should be combined with quality design in order to ensure that the key and defining characteristics of the building are retained. Rural farm buildings are generally characterised by key features such as:

- uncluttered exteriors with blank walls;
- roofs with unbroken lines and few (if any) openings;
- a robust build with simple joinery;
- the original fabric of the walls, floors and roof structure;
- original window frames, doors and shutters (although there may be other fittings of interest too - both inside and out);

- un-partitioned interiors and exposed structural elements; and
- hard-surfaced open yards and open-field surroundings

A.19 A sensitive scheme of conversion is more likely to be achieved if the following general principles are considered as part of the design process:

- Respecting the basic shape and design of the original building.
- Making as few alterations as possible to external walls.
- Maintaining the character of the roof by limiting the number of alterations and projections
- Incorporating purpose made timber joinery into openings.
- Retaining farmyard areas as single open spaces.
- Integrating boundary treatments, car parking, access and services into the proposal as a whole.
- Using adjacent outbuildings for uses associated with the conversion for example storage, garaging etc.
- Minimising the amount of clutter within garden areas.
- Retaining existing mature trees and vegetation where possible.
- Letting the existing building dictate the nature of the conversion.
- Designing simple internal layouts around existing features.

A.20 Conversely, insensitive and inappropriate conversions are often characterised by the following:

- Poor quality or overly large extensions to the existing building.
- Inserting too many new window/door openings into elevations.
- Changing the shape of original openings and regularising the window pattern.
- Inappropriate alterations to the roof.
- Introducing porches, conservatories and other alien features.
- Removing mature vegetation.
- Increasing and domesticating the curtilage area of the building.
- Incorporating visually prominent parking layouts with extensive areas of tarmac or paving.
- Over-intensifying the use of the available interior space.
- Poorly positioned utility installations.
- Light ~~spill-emitted at angles above-greater than 70°-to-the-horizontal-~~ causing harm to the natural environment.

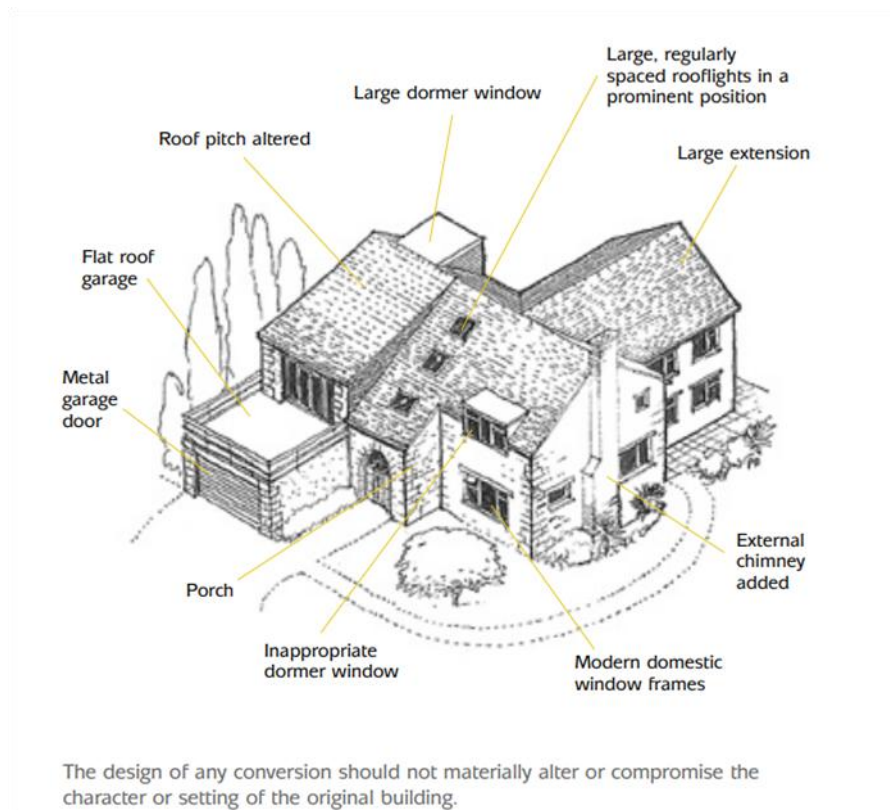


Diagram showing inappropriate features listed above

Openings

- A.21 Rural buildings are often characterised with windows which are often small, often shattered or louvred rather than clean glazed. Doors are typically boarded, split for stables. Sometimes loft or upper loading doors are found.
- A.22 The pattern of openings is a direct product of the historic function of the building over time, its size and character. Rural buildings were essentially cheap and functional with openings and other features provided only where they were essential. Given that many buildings were used as a means of shelter or for storage, openings were generally kept to a minimum with more exposed elevations having fewer openings than those which provided light, ventilation or access. Exceptions include 'model' farm buildings where landlords sought to adopt the latest agricultural improvements. Such buildings are often a little more 'architectural.'

Design Guidelines:

- While the solid-to-void ratio of traditional buildings is a key characteristic, the need for increased levels of natural light is recognised. Glazing solutions should seek to follow the existing structural logic of the building being sensitively located so that the primary form of the building remains intact.
- ~~The insertion of new openings in otherwise blank elevations or where there is no physical evidence of previous openings should, where possible, be avoided – particularly where they are visible from public vantage points such as footpaths and roads.~~
- Original openings that have been blocked up in the past should be re-used in preference to the creation of completely new openings, especially where they have been blocked up in an unsympathetic manner or using an inappropriate material.
- Where new openings are unavoidable, they should be kept to a minimum and great care taken in their positioning, scale and proportions.
- Where it is unavoidable to block up an existing opening, material that is sympathetic to the existing building should be used and recessed to emphasise and evidence the position of the original opening.
- New openings should not interrupt or impact on existing architectural features.
- The utilisation of openings in elevations which would compromise the privacy of adjacent (residential) development should be avoided.



Photograph showing timber casement windows painted “farm red”.

Roof

A.23 The roof is one of the main features of any building as it can be a prominent dominant/visible structure in the skyline. The roof structure is often one of the main features that can suffer structurally when a building is left vacant for a period of time. In cases where work needs to be undertaken on the roof or to re-build it completely, all efforts should be made to restore the original materials and to re-use them. Where this is not possible any new material used should be similar to the original. Local or North Wales Slate or corrugated steel is the most common covering on old rural buildings in the area and therefore it is likely that it should be the roof cover of choice. There may be some instances when another roof covering is suitable, e.g. if the material is characteristic of the area's character. It should be ensured that any roof covering and the design of the roof complies with the guidance set out in Policy 29 (Sustainable Design). It should be sought to ensure that the height, pitch and eaves of the roof are not modified/changed from the original levels. Soffits and bargeboards are usually only found on later revival

buildings: earlier buildings has no soffits the gables were often detailed with slated edges.

- A.24 Consideration should be given to details such as the roof edge and eaves together with the rainwater /associated guttering to ensure they are in keeping with the original building in terms of the type and materials used. It should be ensured that only a limited/essential amount of guttering is installed.
- A.25 Any proposal to convert a rural building should respect the nature and features that contribute towards its architectural value. Contemporary interventions may be appropriate where they are carefully designed, clearly justified, and enhance the character of the building~~Where possible it should be ensured that any modern/alien features are limited.~~ In terms of materials, these should also ~~be traditional and~~ respect what already exists.
- A.26 ~~To ensure that the building's character is respected, roof features should be carefully considered. As a rule, dormer windows will not be permitted except where reinstating pitching and doorways. Where additional daylight is required, rooflights may be an appropriate solution provided they are discreetly designed to minimise visual impact e.g. by installing a roof light that is flush with the roof.~~ To ensure that the building's character is respected, roof features should be carefully considered. As a rule, dormer windows will not be permitted except where reinstating pitching and doorways. Where additional daylight is required, rooflights may be an appropriate solution provided they are discreetly designed to minimise visual impact e.g. by installing a roof light that is flush with the roof.

Walls

- A.27 Most rural buildings are built of local rubble laid in lime mortar. As a rule, earlier buildings were limewashed and later ones of pointed stone. Earlier buildings had timber or stone lintels/arches. By the mid-19th century brick was often used over doors and windows and later for quoining. With local stone no longer being quarried it is important to salvage stone and reuse it for facing work. Old slurry renders and limewashes should be reinstated.
- A.28 For the later 19th Century, corrugated iron was a cheap and quick method of constructing buildings typically rural bungalows, mission churches and church and chapel halls. These are fast disappearing type and any conversion should replicate this traditional form of cladding.
- A.29 The walls must be able to support the load of the conversion proposed. It is on the onus of the applicant to ensure that the integrity of the existing structure is not

compromised during the development. The original walls of the structure must be protected and cannot be dismantled during the conversion construction process.

Flues

- A.30 Adapting an agricultural building for domestic or commercial use will invariably involve the need to provide some form of heating for its occupants and a requirement for a means of ventilation. Whilst boilers with balanced flues can negate the need for a projection through the roof slope, careful consideration should still be given to its position on the external elevation from which it protrudes.
- A.31 The proposed internal arrangement of the building will dictate the likely external position of a flue and this should be carefully considered in the design process to ensure that it is located in the least prominent position possible.
- A.32 Where a projecting flue is required to facilitate an open fire or a solid fuel stove etc, its position should be such that its visual impacts are minimised. Coating a stainless-steel flue in a dark colour can reduce the likelihood of sunlight reflecting from its shiny surface whilst minimising its impact.

Design Guidelines:

- Where no evidence of a chimney exists, introducing a new masonry chimney will not be ~~acceptable~~promoted.
- Where possible, existing chimneys should be used to house heating flues.
- Flues should be discreetly located to avoid visual harm.
- Flues should be painted or powder coated in a dark unobtrusive colour such as matt black/grey.

Rainwater Goods

- A.33 The simple form and character of rural buildings is maintained in the detailing of rainwater goods. Whilst buildings of a higher quality would have incorporated half-round cast iron gutters fixed directly to the wall (no fascia board) by means of rise and fall brackets at the eaves level, the roof of most buildings would have simply extended slightly beyond the eaves leaving water to drain away from the base of the wall.

Design Guidelines:

- If the original building previously had no rainwater goods, the application of new gutters and downpipes should be kept to the minimum necessary avoiding fascia

boards;

- Robust high quality fittings (such as cast iron) are preferable to plastic.
- Rainwater goods should be discreet and where possible located away from main elevations.
- New guttering should be painted to match the doors and windows and hung on rise and fall support brackets.

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Photograph showing cast iron-effect plastic coated aluminium guttering painted black, or could be painted to match the windows. The guttering is attached with rise and fall brackets spiked directly to the wall.

Essential Services

A.34 In many rural buildings it is unlikely that mains water, gas, electricity or drainage will be available and as such new uses, whether commercial or domestic will normally require the careful planning of new services.

- A.35 Where external services are provided they tend to be fairly rudimentary. Drainage, where it exists, is often defective. In some cases, there is no provision at all for rainwater disposal from buildings; the run-off from the roofs is simply allowed to saturate the ground. Where surface water drains are provided they often run to a nearby watercourse or soakaway whilst foul and waste drainage sometimes take the same route. Where connections exist, electricity and telephone lines are invariably brought in on overhead lines strung from posts.
- A.36 Utility cables, foul/sewage drainage pipe work, meter boxes and telephone wires can all be visually intrusive and undermine the character of a building if not considered at an early stage in the design process.
- A.37 Similarly, the last twenty-five years have seen a huge range of technological advances. The introduction of these technologies has subsequently led to the need for the installation of a range of 'equipment' that can be at odds with the traditional character of many rural buildings. Large aerials, satellite dishes and external cabling can easily undermine the rural character of not only the host building, but of the wider setting.
- A.38 The siting and design of installations required to facilitate access to new technology, including television antennas and satellite dishes, should be carefully considered at an early stage so that they can be positioned in discreet locations that minimise their visual impact.

Extensions

- A.39 In the context of Policy 7c) (Countryside) and Technical Advice Note 23 Economic Development paragraph 3.2.1 the building intended for conversion for alternative use should be suitable for the proposed use. The building in its current form (in terms of size) should be suitable, any required extensions should be subservient in scale and form.
- A.40 Where strong justification is submitted, it may be possible to justify small additions to the original building as long as these additions have been designed in a way that is sensitive, subservient and in keeping with the original building but not necessarily pastiche. Any extensions should add value to the building in terms of architectural legibility as well as a wider contribution to the local environment.

Will the conversion result in unacceptable impacts upon the structure, form, character or setting where the building is of historic and / or architectural interest?

Why is the planning authority asking this question?	National Policy Reference	Local Planning Policy Reference
<p>National Planning Policy and the Local Development Plan requires this.</p> <p>Adapting a building for a specific use for which it is not suitable can have a detrimental impact on the character of the building, its contribution to the character of the local area.</p>	<p>Technical Advice Note 23 3.2.1 Bullet 6: <i>conversion does not result in unacceptable impacts upon the structure, form, character or setting where the building is of historic and / or architectural interest.</i></p> <p>3.2.3: <i>If the existing building is unsuitable for conversion without extensive alteration, rebuilding or extension, or if the creation of a residential curtilage would have a harmful effect on the character of the countryside, the same considerations relating to new house building in the open countryside will apply.</i></p>	<p>Policy 14 (Conservation and Enhancement of the Pembrokeshire Coast National Park) focuses on the protection of the National Park qualities, its special landscape character including the need to protect against losing or failing to incorporate important traditional features.</p> <p>Policy 14 (Conservation and enhancement of the Pembrokeshire Coast National Park) does not permit development where this would have an unacceptable adverse effect on the qualities and special landscape and seascape character of the National Park including locally distinctive characteristics by...a) causing visual intrusion...c)failing to harmonise with, or enhance the landform, landscape and seascape character of the National Park...' d)losing or failing to incorporate important traditional features.</p>

Notes: See also Question: Is the building suitable for the specific use? For example, while residential conversions are a means of sustaining the Park's living landscape, such proposals often require a particularly thoughtful approach to design. As some traditional buildings were not originally designed for domestic use, the challenge is to integrate modern living requirements without losing the building's unique character. Therefore, creative, high-quality solutions that work *with* the building's existing structure are often a more suitable alternative over extensive alteration and re-building ~~Is the building suitable for the use? For example, residential conversions can often have detrimental effects on the fabric and character of rural buildings because such buildings are often unsuitable for conversion to residential use~~

Buildings of Historic Importance

- A.41 Any external features of architectural or historic interest should be retained, particularly those that signal the building's former use. The character of a rural building is derived from its original function and every effort should be made to retain the original simplicity of scale and form, and to alter as little as possible both internally and externally.
- A.42 Several buildings survive from the 1939-1945 War, some in groups, others scattered. Whilst their historical importance is acknowledged, most are only suitable for low-key use such as storage due to their construction (often single-brick or prefabricated).
- A.43 Many later rural buildings are built of concrete block and are of plain utilitarian design and form. Such buildings are rarely worthy of conversion. Of this period are many Dutch barns with their characteristic curved roofs. These buildings are a typical feature of the landscape and may sometimes be suitable for an imaginative conversion.
- A.44 A short heritage impact assessment will need to accompany any conversion application for buildings of historic importance.

Listed Buildings

- A.45 There should be a general presumption in favour of the preservation or enhancement of a listed building and its setting, which might extend beyond its curtilage. For any development proposal affecting a listed building or its setting, the primary material consideration is the statutory requirement to have special regard to the desirability of preserving the building, its setting or any features of special architectural or historic interest which it possesses.³ Listed status covers the entire building, internal and external, as well as the historic curtilage, and so works which require consent might include the replacement of windows and internal alterations, for example. Applications for listed building consent for part or the whole of the same works as those covered by a planning application should be applied for and considered together.
- A.46 Whilst the thrust of the guidance is directed at buildings that are unlisted it should be acknowledged that a number of the National Park's traditional rural buildings are afforded additional protection as a result of their listed status. Listing confers legal protection to buildings of special architectural and historic interest which requires local planning authorities to ensure that any alterations are made in a manner that safeguards the building's special interest.
- A.47 Listed Buildings are a valuable and irreplaceable part of the National Park's heritage

³ Paragraph 6.1.10 Planning Policy Wales Edition 12 | February 2024

and their preservation is of paramount importance. To this extent the Authority will encourage suitable and sensitive re-uses to ensure their long-term survival.

- A.48 Listing does not mean that no further changes will be allowed. It is the local planning authority's duty to control changes to Listed Buildings by ensuring that its architectural and historic interest is carefully considered before any alterations are approved. Change can often be accommodated if the special character of the building, which makes it worthy of listing, is understood and respected.
- A.49 However, there are restrictions on what you can do and any alterations which would affect its special character as a Listed Building either internally or externally will require Listed Building Consent.
- A.50 In considering whether to grant consent for development which affects a Listed Building or its setting, the Authority will have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- A.51 Listed Building Consent and Planning Permission are different types of approval although you may sometimes need both for the same work. It is strongly recommended that you contact the Authority's Building Conservation Officer (see Appendix C) if you have any queries or require advice about proposed repairs, maintenance or alterations to a Listed Building.

Chapels & Churches

- A.52 Rural chapels usually have a graveyard associated with them and this can be particularly sensitive in terms of family interments/unmarked graves. The same applies to rural churches, which often occupy ancient sites of high archaeological value. You are always advised to consult with an archaeologist in relation to development of rural churches.

Section B General Considerations

B.1 This section considers additional linked matters which have implications for the conversion of buildings and require particular attention:

- Converting a complex of buildings
- Archaeology
- Biodiversity
- Vehicular access and parking
- Rights of Way
- Lighting
- Energy Efficiency
- Curtilage
- Permitted Development Rights
- Use Classes Order 2022 Wales

Complex of outbuildings

B.2 Where the reuse of a complex of buildings is proposed the National Park Authority will expect an overall scheme for the site to be submitted and agreed by the National Park Authority in advance of applications for individual buildings being considered. Policy 7 (Countryside) Reasoned Justification paragraph 4.49 This is to ensure that a comprehensive approach to the site's development is undertaken.

B.3 In any conversion, the way a range of buildings is subdivided is of paramount importance. This is most obvious in residential conversions, particularly where multiple dwellings are created. Generally speaking, the division of buildings into readily identifiable 'components' such as barn, cart shed or stable and allocating a house to each, is generally the most appropriate approach to take, although this might not satisfy the needs or wants of the developer.

B.4 Where the conversion of a complex of buildings is proposed, the applicant will need to consider if the conversion will lead to the dispersal of activity on such scale as to prejudice town and village vitality. National Planning Policy requires that conversions do not undermine the vitality and viability of towns and villages. Technical Advice Note 23: Economic Development 2014, paragraph 3.2.1. Policy 56 (Retail) in the National Park ...Proposals that would undermine the retail hierarchy...will not be permitted.

Archaeology

- B.5 The Pembrokeshire Coast National Park has a rich archaeological and historical landscape. These represent a finite and non-renewable resource that can be easily damaged or destroyed by development. Once lost, they cannot be replaced.
- B.6 Older buildings can quite often be of archaeological interest. In some cases, buildings will have been erected over or incorporated into earlier buildings so evidence of these sites is crucial to our understanding of the origins and development of rural settlement across the National Park.
- B.7 With this in mind it is desirable that disturbance to archaeological features through activity such as underpinning, provision of oil tanks, new floors and landscaping is avoided or minimised. The extent of the likely archaeological significance of a site can be assessed through the commissioning of a simple evaluation to determine the extent and depth of modern made ground, undisturbed archaeological levels and the depth of natural subsoil. On the basis of such results, design, layout and construction work can be planned to minimise disturbance. Where an important archaeological site is identified and disturbance is unavoidable there will be a need for archaeological recording to form a part of the scheme.⁴

Biodiversity

- B.8 It will be necessary to ensure that any proposal conforms to national policy and guidance as included in Planning Policy Wales, Technical Advice Note 5: Planning and Nature Conservation, together with the relevant biodiversity policies in the Special Qualities Chapter of Local Development Plan 2 (Policy 10 to 12) as supported by the adopted Supplementary Planning Guidance on Biodiversity.⁵ Many buildings in the countryside provide a suitable habitat for a number of protected species including bats, barn owls and nesting birds.
- B.9 The landscape setting for the conversions within the countryside is more important than in other contexts within settlement boundaries. The retention of existing and historic hedgerows and trees should be prioritised to enhance the historic character of the landscape.
- B.10 It will therefore be expected that an ecological survey, including a protected

⁴ <https://www.pembrokeshirecoast.wales/planning/planning-policy/local-development-plan-2/supplementary-planning-guidance-ldp2/archaeology-supplementary-planning-guidance/>

⁵ <https://www.pembrokeshirecoast.wales/planning/planning-policy/local-development-plan-2/supplementary-planning-guidance-ldp2/biodiversity-supplementary-planning-guidance/>

species survey, will be undertaken prior to the submission of an application for the conversion of a building in the countryside. The submission of bat and/or barn owl surveys is required prior to determination of a planning application. If these surveys are required by the local planning authority and are not submitted, the application may be refused on the grounds of insufficient information being provided to demonstrate protected species are not adversely affected. An ecological survey conducted early in the project's development will enable design work to take full account of constraints and opportunities on site. Welsh Government has advised planning authorities (23rd October 2019) ‘..where biodiversity enhancement is not proposed as part of an application, significant weight will be given to its absence, and unless other significant material considerations indicate otherwise it will be necessary to refuse planning permission.’

- B.11 Surveyors should use nationally recognised survey guidelines/methods where available. A suitably qualified ecological consultant will need to be employed to carry out any necessary survey(s). There are seasonal and time constraints to ecological surveying, which should be carefully planned into the development process. Appendix 3 of the Biodiversity Supplementary Planning Guidance sets out Ecological Survey Seasons. If you are unsure about survey requirements, pre-application advice should be sought.
- B.12 The species most likely to be present in these types of buildings are bats, barn owls and swallows. Bats, barn owls and swallows (nesting birds) are protected under the Wildlife and Countryside Act 1981; bats and owls also receive additional protection under the Habitats Regulations 1994.
- B.13 Further advice on the considerations associated with wildlife can be obtained by contacting the Authority's Ecology adviser (Please see Appendix 2 of the Biodiversity Supplementary Planning Guidance for contact details).

Vehicular Access and Parking

- B.14 With careful consideration, access and parking provision for conversion schemes can have a minimal impact on the landscape. Retaining existing farm tracks, concealing vehicles in existing outbuildings or using existing landscape features such as walls and hedges to screen parking areas are just some of the ways in which visual impacts can be minimised.
- B.15 Where new vehicle access and hard standings are required they should be sensitively designed to be discreet in terms of the route and have a minimal visual impact in terms of the surface treatment. The wholesale use of tarmac, the widening of tracks and access ways and kerbing will generally not be appropriate.

- B.16 Commercial uses can often have a greater impact on landscape setting by virtue of the increased number of vehicles potentially using a site and the requisite access and parking requirements need to facilitate them. Concealing vehicles within existing buildings will be less of an option than arrangements which screen parking from view.
- B.17 The proposal must respect the character of the area including the site's setting. In more remote locations the upgrading or creation of access roads, providing electricity etc. can result in adverse impacts on the character of the area.
- B.18 Proposed development should seek to link to the existing transport network without extensive works. This includes connecting with existing sustainable transportation infrastructure.

Public Rights of Way

- B.19 In the countryside it is common for Public Rights of Way to pass close to rural buildings. The view and appearance of a development from a Public Right of Way has the potential to be an imposition on the special visual qualities of the National Park.
- B.20 Where a Public Right of Way crosses a site, the likely impacts of a proposed scheme should be carefully considered and designed so as not to impinge on people's ability to enjoy the open countryside.
- B.21 In these situations, the ability to link the site to the surrounding countryside and nearby settlements should be regarded as an opportunity and potential benefit to the proposal. Where possible, Public Rights of Way should retain their route alignment and in a design context, be treated to suit the character of the site so as to provide an attractive, accessible and secure route for all users.

Energy Efficiency

- B.22 Energy efficient conversions are encouraged; installation of renewable energy generating technologies must be undertaken in a sympathetic manner with an aim to mitigate any impact on the character of the building.
- B.23 The guidance from Cadw in the link in the footnote provides useful advice on how to install generating technologies without impacting detrimentally on the character of a building.⁶

⁶ https://cadw.gov.wales/sites/default/files/2019-05/Micro_gen_booklet_EN.pdf

Design Guidelines:

- Principal elevations or dominant roof slopes should be avoided.
- Consider cumulative visual impact of more than one installation.
- Consider impact of colour, texture and finish of equipment against the fabric of a building.

B.24 'How to Improve Energy Efficiency in Historic Buildings in Wales' also provides detailed guidance on ways to reduce energy use in historic buildings and buildings of traditional construction.⁷

Lighting

B.25 With regard to the design of lighting, a considered and sympathetic approach should be taken to preserve the character and aesthetic appeal of the property. Proposals should adhere to the *Planning for the Conservation and Enhancement of Dark Skies in Wales* Good Practice Guidance. Care must be taken to prevent energy being wasted and limit any negative environmental impacts arising as a result of a property's contribution to light pollution.

B.26 The use of external lighting should be avoided in all areas other than where it is necessary for safety or security reasons. Lighting should be suitably controlled so that lights are only switched on when they are needed, for example through the use of motion sensors and automatic timers.

B.27 To limit a lighting system's contribution to light pollution, lighting should always be orientated in a downwards direction and be suitably shielded such that no light is emitted above the horizontal. External lighting should use switch-off, dimming or PIR sensors. Lighting should be of an appropriate luminosity, only powerful enough to light the desired area without spilling light into the surrounding environment. Light should be of a 'Warm White' in colour with a light temperature not exceeding 2700 Kelvin.

B.28 To limit internal lighting lightspill extensive glazing should be avoided. Blinds, curtains, external shutters and/or the use of tinted or electrochromic glass will be encouraged.

⁷ <https://cadw.gov.wales/sites/default/files/2022-04/How%20to%20improve%20energy%20efficiency%20in%20historic%20buildings%20in%20Wales%20-%20English.pdf>

Curtilage & Outbuildings

B.28B.29 The aim should be to avoid urbanisation of the property curtilage by having a low proportion of building area in relation to land area (i.e. the residential curtilage).

B.29B.30 A key characteristic of older development in the countryside is the way the landscape around it often flows up to the immediate edge of the buildings without any form of curtilage definition. This characteristic needs to be respected whilst meeting the needs of any new use.

B.30B.31 Ideally the curtilage needs to be kept as minimal as possible. Any enclosed private areas need to be carefully sited and contained, particularly in relation to public views and the surrounding landscape.

B.31B.32 Extending gardens into what has been farming land requires planning permission and should be avoided if possible unless there is historical evidence to prove otherwise. Consideration will be given to recreating historic curtilages. Historically, curtilages such as yards and gardens were often removed and annexed to adjacent fields/farmyard improvements, often removing their context.

B.32B.33 New walls or planting, which can be used to screen parking and garden areas, must follow the local vocabulary. Boundary treatments should be appropriate for the context of the area and should ensure that the area remains open in character where this was traditionally the case.

B.33B.34 Where boundary treatments such as gates, walls or native hedges already form part of the traditional character of the countryside location, these should be incorporated into the scheme. Opportunities for the repair of boundary structures where necessary will be favoured over their replacement.

B.34B.35 Where a number of dwellings are arranged around a single courtyard, delineating adequate individual amenity space can be more difficult to achieve. Generally speaking, courtyards should not be divided up but left as a common area leading to the 'front doors' of individual dwellings and where appropriate, used to provide vehicular access and parking for the development.

B.35B.36 The introduction of domestic paraphernalia such as sheds, greenhouses and manicured gardens/landscaping can undermine the rural character and setting of buildings within the countryside. Curtilage areas should therefore remain uncluttered and to achieve this it is standard practice for the Authority to remove permitted development rights or use legal agreements.

B.36B.37 Areas for the storage of gardening equipment etc. should be incorporated into existing buildings at the design stage to negate the need for new (stand-

alone) garages, sheds and general storage buildings within curtilage areas.

Design Guidelines:

- Traditional outbuildings should be retained, repaired and re-used wherever possible and their demolition resisted.
- Existing boundaries (walls and hedges) should be retained, repaired or re-planted to delineate curtilage areas.
- Where new boundaries need to be created they should, where possible, follow existing boundary lines and incorporate existing natural features such as hedgerows, stone walls or footpaths. Their form, type, height and material should reflect those of the associated buildings.
- Proposals for the provision of amenity space are likely to be resisted where they would adversely affect the appearance or character of the countryside and/or the setting of associated buildings.
- The use of tarmac, concrete block paving and pavers in areas of hard standing are alien in colour and character and should be avoided in preference to gravel.

Removal of permitted development rights

B.37B.38 Permitted development rights are provided by the Town and Country Planning (General Permitted Development) Order 1995 (the GPDO) to allow certain types of development to proceed without the need for a planning application since planning permission for them is deemed to be granted. The kinds of work permitted include most householder development e.g. extensions to dwellings (including conservatories), the replacement of windows and doors, erection of boundary walls and fences, the construction of garages and sheds, the siting of oil tanks and provision of hard standings.

B.38B.39 Where a planning application for conversion to a residential use is approved it is highly likely that the permission will be subject to the removal of 'permitted development rights'. This is to protect the rural and agricultural character of the farm buildings once conversion has been undertaken and will require that any future proposals for alterations or extensions to be submitted to the Authority for approval.

Use Classes Order 2022 Wales

B.39B.40 The Amendment to the Town and Country (Use Classes) (Amendment) (Wales) Order 2022 has resulted in three uses now being included are:

- Use Class C3 (dwelling houses; used as sole or main residences occupied for

more than 183 days in a calendar year).

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

~~B.40~~B.41 The amendments to the Use Classes Order may also be applied by the Local Planning Authorities by way of planning conditions to restrict the use of a development to one particular use class within the order, removing permitted development rights to move between uses.

~~B.41~~B.42 Officers will consider the appropriateness of applying conditions to control occupancy given the amendments to the Use Classes Order 1987 which provides for the three use classes alongside implementation of Local Development Plan 2's policies on fulfilling the housing requirement and ensuring that new residential development is prioritized for uses that help sustain communities.⁸

⁸ https://www.pembrokeshirecoast.wales/wp-content/uploads/2023/03/08_23-Planning-Policy-Changes-re-Second-Homes-abd-Short-term-lets.pdf

Section C Further information and contacts

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The Design Commission for Wales offers independent design advice and a national Design Review service to support high-quality, context-responsive development. Early engagement is encouraged, particularly for complex or sensitive conversion proposals.

Further guidance is available through their Site and Context Analysis Guide and Design and Access Statement Guidance.

Parc Cenedlaethol Arfordir Penfro Pembrokeshire Coast National Park



Pembrokeshire Coast National Park Local Development Plan 2

Replacement Dwellings in the Countryside

Supplementary Planning Guidance ~~3rd Draft~~

Consultation: 10 October to 5 December 2025
Adoption **XXX**

This item is also available in Welsh/ Mae'r eitem hon ar gael yn Gymraeg hefyd

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Introduction

1. In September 2020 the Pembrokeshire Coast National Park Local Development Plan 2 (end date 2031) was adopted by Pembrokeshire Coast National Park Authority. As established in planning law, all decisions must be made in accordance with the development plan, unless material considerations indicate otherwise.
2. Supplementary Planning Guidance is taken into account as a material planning consideration provided it is derived from and is consistent with the adopted Local Development Plan. ~~While only the policies in the adopted development plans have special status in deciding planning applications, (i.e. for the purpose of any determination under the Planning Acts, the determination must be made in accordance with the relevant Plan unless material considerations indicate otherwise), Supplementary Planning Guidance can be taken into account as a material planning consideration provided it is derived from and is consistent with the adopted development plan and has itself been the subject of consultation, which will carry more weight.~~
3. This Replacement Dwellings in the Countryside Supplementary Planning Guidance is primarily laid out as a series of hierarchical questions and describes how the relevant Development Plan policies are applied to proposals for replacement dwellings. By highlighting potential areas of conflict with policy and all adopted guidance, this guidance will enable applicants to prepare a replacement dwelling scheme that is more likely to be supported. This Replacement Dwellings Supplementary Planning Guidance dovetails with the National Park Authority's Supplementary Planning Guidance on Sustainable Design and Development, Landscape and Seascape Character, and Biodiversity.¹ ~~This Supplementary Planning Guidance provides detailed information regarding the way in which Development Plan policies will be applied to planning applications for replacement dwellings. The Supplementary Planning Guidance has been drafted to ensure it dovetails with the National Park Authority's Supplementary Planning Guidance documents on Sustainable Design and Development, Landscape and Seascape Character, and Biodiversity~~
4. Like for like replacement dwellings in the countryside have long been accepted in principle as an exception to general policies that strictly control new residential development in the countryside provided that key policy tests are satisfied. This means that a context-led scheme for a replacement dwelling which enhances the landscape character can enable the renewal of existing housing stock without increasing the overall number of dwellings in the countryside.
5. Applicants are strongly encouraged to engage in pre-application discussions

¹ <https://www.pembrokeshirecoast.wales/planning/planning-policy/local-development-plan-2/supplementary-planning-guidance-ldp2/>

with the National Park Authority from an early stage. This provides an opportunity to identify opportunities, address potential constraints early and explore design-led solutions in a collaborative way. Early engagement through pre-application advice can help streamline the application process, reduce uncertainty and improve the prospects of a successful outcome. In addition to the Authority's standard pre-application service, a non-statutory service is also available, offering a tailored charging structure. This service is designed to provide more bespoke and comprehensive advice, helping to add value to development proposals.

6. The Authority receives a number of applications for replacement dwellings in the countryside. Where proposals focus solely on maximizing building footprints, it remains a core principle that development that has an adverse landscape impact is strictly controlled. Applicants are encouraged to pursue high-quality, proportionate designs that respect building and landscape character, ensuring that new developments are both viable in the current market and sympathetic to their environment.

3.—

The Policy Context

Future Wales 2040 & Local Development Plan 2

7. Under planning legislation, the planning policies for every area are contained within the 'development plan'. Future Wales 2040 sets out a spatial strategy *which 'by focusing large scale growth on the urban areas, development pressures can be channelled away from the countryside.'*² The Pembrokeshire Coast National Park Local Development Plan 2 was adopted in September 2020. The spatial strategy of the Local Development Plan 2 similarly channels development towards towns and villages.

8. **Policy 1 (National Park Purposes and Duty)** of the Local Development Plan is the overarching policy of the Plan which embodies these purposes and duty in the context of the National Park's communities. It outlines that development within the National Park must be compatible with

- a) the conservation and enhancement of the natural beauty, wildlife and cultural heritage of the Park, and
- b) the public understanding and enjoyment of the special qualities

If there is a conflict between the purposes that cannot be resolved, the first

² Page 64, second paragraph. Future Wales The National Plan 2040
<https://www.gov.wales/sites/default/files/publications/2021-02/future-wales-the-national-plan-2040.pdf>

purpose relating to conservation and enhancement has greater weight. This is known as the 'Sandford principle'.

4.—

9. Policy 7 (Countryside) of the Local Development Plan 2 strictly controls development in the countryside.—.

10. The Local Development Plan 2 does not include a bespoke policy for replacement dwelling proposals. It does however set out strategic principles that form considerations in all development management decisions. This includes Policy 8 (Special Qualities), Policy 14 (Conservation and Enhancement of the Pembrokeshire Coast National Park), Policy 29 (Sustainable Design) and Policy 31 (Minimising Waste).

11. The Authority has published the following Supplementary Planning Guidance which may assist applicants in understanding best practice for achieving high-quality design that positively responds to, and enhances, the landscape character and cultural heritage of the Pembrokeshire Coast National Park.

- Sustainable Design and Development
- Landscape Character
- Seascape Character
- Good Practice Guidance: Planning for the conservation and enhancement of dark skies in Wales

E

By incorporating policies and guidance into a high-quality design, a replacement dwelling can:

- Re-use existing and local building materials to satisfy Policy 29 (Sustainable Design) and Policy 31 (Minimising Waste) which requires development to be well designed in terms of the use of materials and resources.
- the use of more building materials and further depletion of the earth's resources — Policy 29 (Sustainable Design) and Policy 31 (Minimising Waste) requires development to be well designed in terms of the use of materials and resources.
- Make a positive contribution and enhance the landscape character to satisfy Policy 29 (Sustainable Design) which requires the development to be well designed well in terms of place and local distinctiveness and Policy 14 (Conservation and enhancement of the Pembrokeshire Coast National Park) which requires that development does not have an unacceptable adverse effect on locally distinctive characteristics by losing or failing to incorporate important traditional features.
- the potential loss of a building that contributes positively to the character of the local area. Policy 29 (Sustainable Design) requires the development to

~~be designed well in terms of place and local distinctiveness and Policy 14 (Conservation and enhancement of the Pembrokeshire Coast National Park) requires that development does not have an unacceptable adverse effect on locally distinctive characteristics by losing or failing to incorporate important traditional features.~~

- ~~• Help to maintain an appropriate mix and the affordability of housing in an area by encouraging replacement dwellings to take into account the scale of the existing dwelling and its context (Policy 52 Housing Mix) seeking the introduction in the countryside of larger more expensive properties that are less affordable in a location that struggles with affordability issues in the first instance.~~
- ~~• seeking the introduction in the countryside of larger more expensive properties that are less affordable in a location that struggles with affordability issues in the first instance.~~

~~Given the resurgence of the housing market in recent years the Authority has received a number of applications for replacement dwellings in the countryside many of which fail to consider that in principle, development in the countryside must be strictly controlled and instead focus on maximising the development footprint within the confines of the whole site.~~

The role of this guidance is to ensure that such proposals are subject to careful consideration to ensure that they comply with the policies of the Local Development Plan 2.

12.

- ~~5. It is encouraged that this guidance be used alongside the submission of a pre-application due to the nature of the development.~~

The Status of Supplementary Planning Guidance

~~6-13.~~ Supplementary Planning Guidance (SPG) ~~may be forms~~ a material planning consideration during the process of assessing and determining planning applications. Welsh Government and the Planning and Environment Decisions Wales (PEDW) will place ~~considerable~~ weight on supplementary planning guidance that stems from, and is consistent with, a development plan. This means that Supplementary Planning Guidance does not introduce any new planning policies. ~~SPG does not introduce any new planning policies.~~

~~7-14.~~ In accordance with Welsh Government advice, this draft SPG will be

subject to public consultation and adoption by the National Park Authority.

~~8.15.~~ The following guidance has been split into three sub-sections. The sub-sections relate to the following topics:-

Section A: Key Questions

Section B: General Matters

Section C: Further information and contacts

~~9.16.~~ This Supplementary Planning Guidance will provide further guidance in relation to the planning considerations in relation to applications for replacement dwellings in the countryside. The 'countryside' in this context is defined as being sites located outside the Centres, as defined within Local Development Plan 2.

Section A: Key Questions

- A.1 This section lists five key questions which should be taken into consideration at the ~~ouset~~~~outset~~ of any replacement dwelling proposal. The basis of each question is linked to national and local policy which provide reference for further information and guidance. Below are key questions to consider in relation to proposals for the replacement of dwellings in the countryside. Further detailed guidance is then provided in relation to these key questions.
- A.2 The questions form a hierarchical series and should be considered in order. This will highlight how a replacement dwelling proposal may or may not accord with policy and how this could be addressed. It should be noted that actions under individual questions will have consequential implications for responding to other questions when developing proposals. A comprehensive approach to proposals is therefore required.

Q1. Does the present dwelling have a lawful residential use?

Why is the planning authority asking this question?	National Policy Reference	Local Planning Policy Reference
<p>In countryside locations, the existing dwelling must have an established use as a residential unit otherwise it would be considered to create a new dwelling which is contrary to National planning policy.</p> <p>The original dwelling must have a lawful permanent residential use and be capable of residential occupation in its current condition and form before any acceptable approved alteration.</p> <p>See paragraph 'Error! Reference source not found.' below for further detail.</p>	<p>Planning Policy Wales (Edition 12 February 2024)</p> <p>Development in the Countryside 3.60</p> <p><i>'Development in the countryside should be located within and adjoining those settlements where it can best be accommodated in terms of infrastructure, access, habitat and landscape conservation. However, new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled.'</i>³</p>	<p>Policy 7 (Countryside)</p> <p><i>Outside the identified Centres is countryside where development must be strictly controlled ...</i></p>

Practical Guidance: Notes: Lawful Use

In considering residential units that are subject to an application for demolition and replacement the Authority will have to, in the first instance, ensure that the proposed unit for demolition has a legal use as a residential unit, i.e. it will be necessary to ensure that no abandonment of the unit has taken place. 'Abandonment' is when the original permitted use has been lost. In order to determine if an abandonment of use has taken place then the proposal will have to be considered against the following criteria⁴:-

- a) The physical condition of the property;
- b) The period that has elapsed since the building was last used;
- c) If the building has been used for alternative uses;
- d) The owner's intention;

Buildings without a lawful residential use may be suitable for conversion – see Policy 7c)

³ Future Wales 2040 sets out a spatial strategy which 'by focusing large scale growth on the urban areas, development pressures can be channelled away from the countryside.'

⁴ Trustees of Castell-y-Mynach Estate v Taff-Ely BC [1985] JPL 40

-(Countryside) which deals with the conversion of buildings in the countryside and its supporting supplementary planning guidance.

In cases where the possibility of abandonment is unclear, the planning authority suggest submitting a ~~Certificate~~Certificate of Lawfulness application to assess whether the residential use has been retained. This will require comprehensive supporting information and evidence which will be measured against the criteria above. The outcome of a certificate of lawfulness application will determine whether a replacement dwelling in the countryside can be justified in planning terms.

**Answer to Q1 is yes
– go to next question**

**Answer to Q1 is no -
planning permission unlikely to
be granted**

Q2. Is the existing building considered to be making a positive contribution to the character of the area through its intrinsic architectural merit or its setting in the landscape?

Why is the planning authority asking this question?	National Policy Reference	Local Planning Policy Reference
<p>The proposal should not result in the loss of a building which contributes positively to the character of the local area.</p> <p>If an application seeks to demolish and replace a building <u>that is of such architectural, historic or landscape importance and/or that its loss would result in harm to the character of the area that the Authority considers to be worthy of retention because of its contribution to the visual and intrinsic character of the National Park's rural landscape, the then</u> planning permission is unlikely to be granted in accordance with Policy 14.</p>	<p>Planning Policy Wales (Edition 12 February 2024) Paragraph 6.0.2 <i>"The special and unique characteristics and intrinsic qualities of the natural and built environment must be protected in their own right, for historic, scenic, aesthetic and nature conservation reasons. These give places their unique identity and distinctiveness and provide for cultural experiences and healthy lifestyles."</i></p> <p>TAN 12 Design 5.8.1 <i>"The special qualities of the rural landscape and coastline of Wales should be recognized. The qualities should be enhanced through conservation of the character of the countryside and by achieving quality in new development."</i></p>	<p><u>Policy 1 (National Park Purposes and Duty) sets out the National Park's purposes and duty, ensuring that development conserves and enhances the natural beauty, wildlife and cultural heritage of the Park.</u></p> <p><u>Policy 8 (Special Qualities) lists the priorities to ensure theat Park's qualities will be protected and enhanced. These qualities are characteristics and features which individually or in combination contribute to making the National Park unique.</u></p> <p>Policy 14 (Conservation and enhancement of the Pembrokeshire Coast National Park) does not permit development where this would have an unacceptable adverse effect on the qualities and special landscape and seascape character of the National Park including locally distinctive characteristics by... d) losing or failing to incorporate important traditional features.</p>

Practical GuidanceNotes: Character

The historic and/or aesthetic character of many buildings across the National Park relies on simple and solid proportions, rural buildings characterized by locally available building

materials. Change came in the later nineteenth century when slate from North Wales was increasingly used and during the early part of the twentieth century when corrugated steel and some brick was used.

For Listed Buildings, there should be a general presumption in favour of their preservation or enhancement, and its setting, which might extend beyond its curtilage.⁵

The vast majority of rural buildings are not listed and despite some loss of detail, most retain their form well. These seemingly 'ordinary' buildings give the National Park its special character in terms of built form.

Where the dwelling is making a positive contribution to the local character of the area and the owner wishes to improve or increase the available residential accommodation then an extension may be the most appropriate means of improving accommodation, although each case will be assessed on its individual merits. ~~the only option will be an extension to the dwelling~~

The Authority has published the following Supplementary Planning Guidance, which may further assist applicants in understanding best practice for achieving high-quality design that positively responds to, and enhances, the landscape character and cultural heritage of the Pembrokeshire Coast National Park. In particular, the Landscape and Seascape Character Guidance provides useful information on landscape receptors, which can help inform the siting and design of replacement dwellings.

~~documents~~ The Landscape Character Supplementary Planning Guidance documents 28 unique landscape areas in the National Park each with its own set of special qualities. Early reference to the relevant Landscape Character Assessment is recommended so that applicants can consider the specific qualities of the subject site. The assessment will highlight landscape receptors and the applicant can consider whether the existing dwelling makes a positive contribution to and enhances the landscape. Generally, the varying sensitivity of the National Park landscape areas hinges on the range or strength of the special qualities which are found or experienced in each place.

- Sustainable Design and Development
- Landscape Character
- Seascape Character

~~Listed Buildings: There should be a general presumption in favour of the preservation or enhancement of a listed building and its setting, which might extend beyond its curtilage. For any development proposal affecting a listed building or its setting, the primary material consideration is the statutory requirement to have special regard to the desirability of preserving the building, its setting or any features of special architectural or local historic interest which it possesses.~~⁶

**Answer to Q2 is no
– go to next question**

**Answer to Q2 is yes
– planning permission unlikely
to be granted**

⁵ Paragraph 6.1.10 Planning Policy Wales Edition 12 | February 2024

⁶ Paragraph 6.1.10 Planning Policy Wales Edition 12 | February 2024

Q3. Is demolition of the existing dwelling justified?

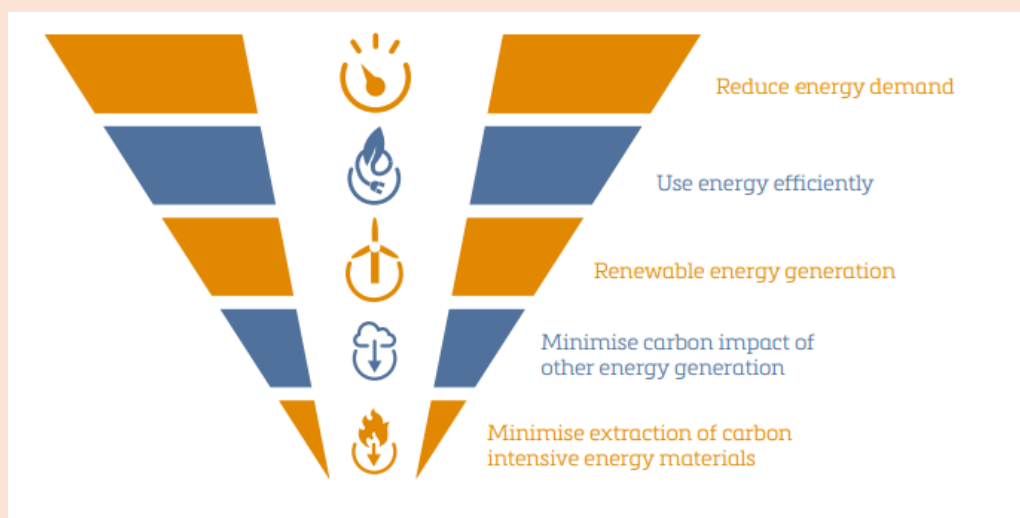
Why is the planning authority asking this question?	National Policy Reference	Local Planning Policy Reference
<p><u>The demolition and replacement of buildings has implications for resource use and embodied carbon, as materials and energy invested in existing structures are lost and new emissions arise from the construction processes. National policy encourages careful consideration of whether reuse or refurbishment represents a viable and appropriate alternative. While replacement dwellings may achieve improved operational energy performance, a net benefit may not be realised for a substantial period of time as result of the emissions associated with demolition and construction. When a building is demolished and a new one is put in its place, the emissions locked into the original building are wasted and the new building's material manufacturing and construction processes create new emissions. Even energy efficient buildings can take decades to save more operational energy emissions than were created in the construction process.</u></p>	<p>Planning Policy Wales (Edition 12 February 2024) 5.13.5 <i>'Waste prevention and approaches towards encouraging reuse and recycling should be considered at an early stage as part of materials choices and design.'</i></p> <p>TAN 12 Design Page 22 Response <i>'should incorporate adaptable and flexible development that can respond.....to minimise the need to demolish and rebuild.'</i></p>	<p><u>Policy 29 (Sustainable Design) All Proposals for development will be expected to demonstrate an integrated approach to design and construction, and ...to be well designed in terms of: e) efficient use of energy; f) energy generation; g) materials and resources: and i) waste</u></p> <p>Policy 29 (Sustainable Design) All Proposals for development will be expected to demonstrate...to be well designed in terms of: g) materials and resources</p> <p>Policy 31 (Minimising Waste) <i>Development must minimise, re-use and recycle waste generated during demolition and construction ...'</i></p>

Practical GuidanceNotes: Reuse or Demolish

From a sustainability perspective, reusing, refurbishing, or adapting an existing dwelling will usually be the most carbon-efficient option. TAN 12 (Design) recognises that environmental sustainability requires a design solution which integrates carbon reduction

by minimising the carbon emissions associated with development through implementation of the energy hierarchy, or deliver zero carbon standards. In the past there was debate about whether it was better for the climate to demolish an old energy-hungry building and build a well-insulated replacement. However, it is now recognised that in most cases it may be possible and appropriate to retrofit older properties instead of completely demolishing them.

In accordance with Policy 31 (Minimising Waste) if a replacement dwelling is proposed it must also be demonstrated that the existing dwelling is not capable of retention through renovation. Both Planning Policy Wales and TAN 12 outline the energy hierarchy and the primary goal to reduce energy demand (see figure below): ⁷



To demonstrate that renovation is not a viable proposition a Structural Report, prepared by an appropriately qualified person, such as a Structural Engineer should be submitted with the application that sets out the evidence demonstrating how demolition and re-building outweighs the benefits of reuse through refurbishment.

Any replacement dwelling application should demonstrate how the hierarchical approach has been satisfied through carbon reduction design solutions.

Particularly in instances where the existing dwelling is not considered to be near the end of its lifespan, replacement of the dwelling as opposed to renovation and refurbishment should be justified. In these circumstances applicants may be asked to submit additional supporting information, including which may include: a carbon assessment that quantifies the embodied energy of the existing building, carbon calculations demonstrating how emissions arising from demolition are mitigated or offset, or a detailed schedule of materials outlining how construction will adopt circular economy principles. In these cases, the involvement of a suitably qualified professional, such as a BREEAM Assessor, can provide technical expert advice on how to achieving carbon efficiency for an existing building or replacement dwelling proposal. higher sustainability performance.

⁷ Planning Policy Wales Edition 125.8.1 The planning system should support new development that has very high energy performance, supports decarbonisation, tackles the causes of the climate emergency, and adapts to the current and future effects of climate change through the incorporation of effective mitigation and adaptation measures.

Applicant should Note that the financial costs attached to any type of development do not form a material planning consideration.

Answer to Q3 is yes – go to next question.

Answer to Q3 is no – planning permission unlikely to be granted unless evidence substantiates the benefits of demolition.

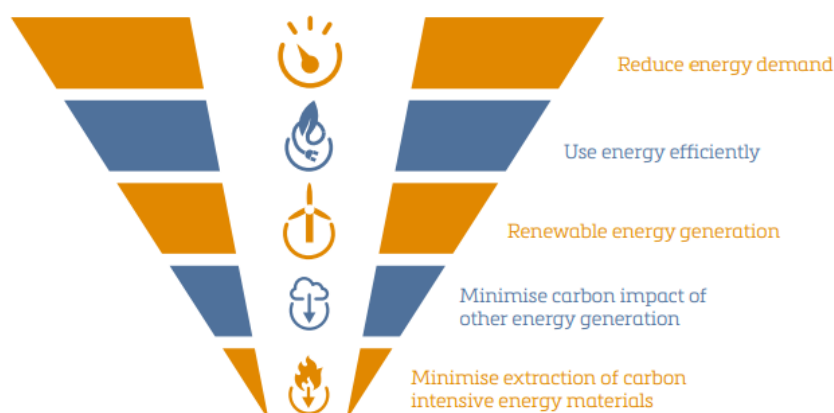
~~185. The construction, demolition and excavation sector is responsible for 62 per cent of the total waste generated in the UK. It is estimated that 80 per cent of buildings currently standing will still be in use in 2050: if the UK is to meet its net zero goals, the majority of these will require retrofitting to become energy efficient.~~

~~186. There is a clear policy imperative to reduce the consumption of resources in the building and construction sector, to reduce waste material arising from demolition and replacement of existing properties, and to prioritise work to reduce emissions attributable to the built environment.~~

~~187. The evidence we received⁸ consistently recommended that retrofit and reuse be prioritised over new building order to conserve resources, reduce waste, minimise embodied carbon emissions, and provide a cost-effective solution to delivering on housing demands.'~~

~~'213. Retrofit and reuse of existing buildings, where practicable, should be prioritised over new build to conserve resources, minimise embodied carbon emissions, reduce demolition waste and deliver cost-effective solutions to delivering on housing demand.'~~⁹

In accordance with Policy 31 (Minimising Waste) if a replacement dwelling is proposed it must be demonstrated that the existing dwelling is not capable of retention through renovation. Figure 1.0 below from Planning Policy Wales 12 outlines the energy hierarchy where the principal aim is to reduce energy demand:



⁸ Chartered Institute of Building; Green Alliance; Dr Niamh Murtagh et al; Royal Institute of British Architects; Royal Institution of Chartered Surveyors; The Institution of Structural Engineers

⁹ House of Commons Environmental Audit Committee Building to net zero: costing carbon in construction First Report of Session 2022–23 Report, together with formal minutes relating to the report Ordered by the House of Commons to be printed 11 May 2022 <https://committees.parliament.uk/publications/22427/documents/165446/default/>

~~To demonstrate that renovation is not a viable proposition a Structural Report, prepared by an appropriately qualified person, should be submitted with the application that sets out the evidence demonstrating how demolition and re-building outweighs the benefits of reuse through refurbishment.~~

~~Where an approval for a replacement dwelling is granted, the LPA will usually require a Construction Method Statement (CMS) to be submitted prior to commencement. The CMS will be expected to include details of a scheme for recycling/disposing of waste resulting from demolition. Applicants will be expected to demonstrate that they are recycling and reusing as much waste on site as possible.~~

Q4. Is the replacement dwelling within the same footprint as the existing dwelling?

Why is the planning authority asking this question?	National Policy Reference	Local Planning Policy Reference
<p>The aim is to ensure that the proposal respects national policy to strictly control development in the countryside and also that it should not create unacceptable visual intrusion.</p> <p>To this end the Authority would expect that the resulting development should reflect the same amount of development that it is replacing.</p> <p>As a very-minimum, the proposals should not cause a greater adverse visual impact than the existing dwelling. A dwelling sited on the same footprint as the original dwelling would in the main be most likely to achieve that objective.</p> <p>Relocation within the curtilage of the existing dwelling would need to demonstrate clear benefits to be supported. This does not mean, however, that the whole curtilage can be developed.</p>	<p>Planning Policy Wales (Edition 12 February 2024) Development in the Countryside 3.60 <i>'...new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled.'</i>¹⁰</p> <p>TAN 12 Design Page 19 notes that a Design response following appraisal of context should respond to:</p> <ul style="list-style-type: none"> • <i>Landscapes and townscapes, culture and biodiversity</i> • <i>Locally distinctive patterns and forms of development</i> • <i>Existing buildings, infrastructure, urban/rural landscapes and public art</i> • <i>Clear boundaries and established building lines</i> • <i>Appropriateness of uses and the mix of uses and densities</i> • <i>Easily recognizable and understood features and landmarks</i> 	<p>Policy 7 (Countryside) <i>Outside the identified Centres is countryside where development must be strictly controlled ...</i></p> <p>Policy 14 (Conservation and enhancement of the Pembrokeshire Coast National Park) <i>does not permit development where this would have an unacceptable adverse effect on the qualities and special landscape and seascape character of the National Park including locally distinctive characteristics by...a)causing visual intrusion...c)failing to harmonise with, or enhance the landform, landscape and seascape character of the National Park...'</i></p> <p><u>The Authority's Sustainable Design and Development Supplementary Planning Guidance advises that development should respond to the physical characteristics of a site, respecting the height, sight lines, building lines, historic development patterns and orientation of development within the locality.</u></p>

[Practical GuidanceNotes: Siting :- Siting](#)

[The siting of a replacement dwelling should seek to establish a positive relationship with](#)

¹⁰ Future Wales 2040 sets out a spatial strategy which 'by focusing large scale growth on the urban areas, development pressures can be channelled away from the countryside.'

surrounding development and the wider landscape, and to contribute to local character and sense of place, while avoiding unacceptable harm. The siting of a replacement dwelling should be informed by an understanding of the site and its landscape context, seeking to establish a positive relationship with surrounding development and the wider landscape, and to contribute to local character and sense of place, while avoiding unacceptable harm. The aim should generally be to locate the replacement dwelling in the least conspicuous position within the curtilage subject to the new dwelling having a satisfactory relationship with any surrounding development. The best way to achieve this is normally for the dwelling to be sited on the same footprint as the original dwelling.

The new unit should ideally be sited on the footprint of the existing building. However, alternative locations within the curtilage may be considered where they offer clear benefits. The new unit should be located on the footprint of the existing building unless there are advantages, such as enhancing the visual relationship with the surrounding landscape, improving amenity for local residents, or reducing flood risk.¹¹ for example, in terms of visual impact and/or impact on the amenities of local residents or moving from an area susceptible to flooding.

If it is possible to prove that there are benefits to be had by locating the dwelling on an alternative location within the curtilage of the site then this would be acceptable where there is no increase in the visual impact of the dwelling within the landscape. The assessment of impact should include views from a distance as well as from the immediate neighbourhood.

Answer to Q4 is yes – go to next question.

Answer to Q4 is no – planning permission unlikely to be granted unless robust evidence suggests positive gains to re-

¹¹ Policy 36 Relocation of existing permanent dwellings affected by coastal change

Q5. Is the dwelling proposed of a similar scale and size to the original dwelling?

Why is the planning authority asking this question?	National Policy Reference	Local Planning Policy Reference
<p>The proposal should not create unacceptable visual intrusion which, as a very minimum, should be no greater in scale and size than the existing dwelling being replaced.</p> <p>A dwelling which is of similar scale and size as the original dwelling would in main most likely achieve that objective.</p>	<p>TAN 12 Design 5.8.3 <i>“Many buildings in rural Wales occupy visibly prominent locations and the scope for damaging local distinctiveness through inappropriate development may be even greater than in densely developed areas.”</i></p> <p>Planning Policy Wales (Edition 12 February 2024) Housing Delivery 4.2.25 <i>In the open countryside, away from established settlements recognised in development plans or away from other areas allocated for development, the fact that a single house on a particular site would be unobtrusive is not, by itself, a good argument in favour of permission; such permissions could be granted too often, to the overall detriment of the character of an area.</i></p>	<p>Policy 14 (Conservation and enhancement of the Pembrokeshire Coast National Park) does not permit development where this would have an unacceptable adverse effect on the qualities and special landscape and seascape character of the National Park including locally distinctive characteristics by...a)causing visual intrusion b) intensifying a use which is incompatible with its location...c)failing to harmonise with, or enhance the landform, landscape and seascape character of the National Park...’</p> <p><u>Policy 29 (Sustainable Design) All Proposals for development will be expected to demonstrate an integrated approach to design and construction, and ...to be well designed in terms of: a) Place and local distinctiveness</u></p> <p><u>Policy 30 (Amenity) does not permit development where it has an unacceptable effect on amenity, particularly where: b) the development is of a scale incompatible with its surroundings; and/or d) the development is visually intrusive.</u></p>

Notes: Practical Guidance: Size and Scale

The design solution for a replacement dwelling should be informed by the scale and size of the existing dwelling. Policy 14 (Conservation and enhancement of the Pembrokeshire Coast National Park) of the Local Development Plan encourages development to be compatible with the character of the landscape.

The replacement of small rural dwellings with significantly larger buildings can, in some circumstances, alter the character of a site itself or its surroundings. The replacement of

~~small country dwellings with more grandiose houses can radically change the character of the site to one of a more suburban nature and also reduce the supply of smaller rural dwellings. The development should be of a similar scale and size as the original building to be in accordance with criterion b) of Policy 14 of Local Development Plan 2. The replacement of small rural dwellings with significantly larger buildings can, in some circumstances, alter the character of a site itself or its surroundings and also reduce the supply of smaller rural dwellings.~~

Appropriate consideration will need to be given to the mass, design, height and openings of the proposed development to ensure that the proposal is not obtrusive in the landscape~~blends in naturally into the landscape~~. The development must preserve the identity, character and local distinctiveness of the landscape and safeguard the Special Qualities of the National Park. The unit's original floor area should be considered when considering if the development's scale is of a similar footprint to the original.

Where justification has been provided, demonstrating that a floor area greater than that of the original building is necessary, any increase should generally be limited to approximately 30% of the floor area of the original unit. This figure is intended as a guide rather than a fixed limit and each proposal will be assessed on its individual merits. It should be demonstrated that any increase in floor area is essential for functional and practical reasons, and not sought primarily to increase the overall size of the dwelling beyond what is reasonably required~~Where justification has been received that would mean that the floor area would need to be larger than the original building, it is considered that this addition should be no larger than 30% of the floor area of the original unit. It is noted that this figure is a guide and not a target and every application will be assessed individually on its merit. It should be ensured that the addition in the floor area is essential in terms of practicality and should not be part of an aspiration for a larger house.~~ No outbuilding should be considered when calculating the floor area of the residential unit.

A well-designed replacement dwelling which is of a different scale and size would need to demonstrate clear benefits in reducing the impact on the surrounding landscape to be supported.

Answer to Q5 is yes – proceed to Section B.

Answer to Q5 is no – planning permission unlikely to be granted unless there are clear benefits in reducing impact on the surrounding landscape.

Section B: General considerations

Design

B.1 Within the broad principles relating to scale and size set out above, proposals for replacement dwellings will be expected to demonstrate a high standard of design. Proposals should be informed by the surrounding landscape and built environment, and, where relevant, by traditional forms and materials, while responding appropriately to their landscape setting. This does not preclude a modern design approach, provided that the proposal respects its surroundings and does not result in a discordant or intrusive feature within the landscape.

B.2 It is expected that residential replacement will include the principles of good quality design – Policy 29 (Sustainable Design) supported by the Authority’s Sustainable Design Guidance. ~~Proposals should give consideration to the traditional features of the design and materials and where appropriate should accord with the nearby built environment. Any design should respect the character of the landscape and should not introduce a development that is incongruous or intrusive within the landscape.~~

B.3 Planning Policy Wales also emphasises that design should be context-led but not stylistically prescriptive. Paragraph 3.16 balances the need for high-quality design requiring that planning authorities remain open to innovation, ensuring that creative architectural responses are not unnecessarily restricted.

B.1

Curtilage

B.4 The space around and between buildings is essential to the character of the setting and broader landscape. Boundary treatments play an important role in preserving traditional features and the characteristic pattern of land and building layout in a locality.

~~B.2 The space around and between buildings is essential to the character of the setting and broader landscape. The proposal must respect the character of the area including the site’s setting in accordance with Policy 14 (Conservation and enhancement of the Pembrokeshire Coast National Park) and seek to harmonise and enhance the landform and landscape character (criterion c). Surrounding open areas and boundary treatments play an important role in preserving traditional features and the characteristic pattern of land and building layout in a locality.~~

B.3B.5 The aim will be to avoid urbanisation of the property curtilage by having an acceptable proportion of building area in relation to land area (i.e. the residential

curtilage¹²) rather than walls and fences to enhance the green rural context.

B.4 Extending gardens into what has been farming land requires planning permission and should be avoided, especially when natural landscape features such as native hedges, bushes and trees, form the boundary of the property. ~~The quality of agricultural land is a material planning consideration and land of the highest quality grades is conserved as a finite resource.~~¹³ ~~Historical evidence can suggest a different curtilage layout to existing and in these cases restoration of the original curtilage may be appropriate, if possible unless there is historical evidence to prove otherwise. Exceptionally, consideration will be given to recreating historic curtilages.~~ Historic curtilages such as yards and gardens were often removed and annexed to adjacent fields/farmyard improvements. A proposal which restores an historic curtilage should demonstrate its historical use or appearance and restoration of any historical features. Where there is a need to create a new or additional curtilage for a replacement dwelling, this needs to be as minimal area as possible.

B.6

B.7 Boundary treatments play an important role in preserving traditional features and the characteristic pattern of land and building layout in a locality. An applicant should consider how the boundary treatments contribute to the character of the site and wider landscape with existing boundary treatments that add to the character of the building and setting retained and incorporated into the design, in accordance with Policy 14, criterion d. Where boundary treatments such as gates, stone walls built in local materials, split timber fencing and gates, or native hedgerows or Pembrokeshire hedgebanks which already form part of the traditional character of the countryside location, ~~these~~ should be incorporated into any scheme. Opportunities for the repair of boundary structures where necessary will be favoured over their replacement.

B.5B.8

Access and parking areas will already be present on the site and should require minimal adjustment. They are nevertheless integral to landscape design and a replacement dwelling can present the opportunity to improve surface water

¹² Planning Policy Wales Edition 12: 1. The curtilage is defined as the area of land attached to a building. All of the land within the curtilage of the site will also be defined as previously-developed. However, this does not mean that the whole area of the curtilage should therefore be redeveloped. For example, where the footprint of a building only occupies a proportion of a site of which the remainder is open land (such as a hospital) the whole site should not normally be developed to the boundary of the curtilage. The planning authority should make a judgement about site layout in this context, bearing in mind other planning considerations such as policies for the protection of open space, playing fields or development in the countryside. They should consider such factors as how the site relates to the surrounding area and requirements for on-site open space, buffer strips and landscaped areas.

¹³ Agricultural Land Classification Frequently Asked Questions: <https://www.gov.wales/agricultural-land-classification-frequently-asked-questions>

drainage, the character of the setting and improve biodiversity. Areas should be surfaced in permeable materials that are appropriate in appearance for the rural location. Introducing new edge planting can soften the visual contrast of hard standing areas within the landscape. The location and size of access and parking areas should avoid incursion into existing features to minimize any loss of biodiversity or character. The visual impact of an access and parking area should be considered holistically with the anticipated presence of vehicles also a design consideration.

Lighting

B.6B.9 The 'Dark skies' and 'tranquility' are identified as updated special qualities in the National Park's Partnership Plan 2025-2029 of the National Park in LDP 2¹⁴; Policy 8, with the special qualities updated in the National Park's Partnership Plan 2025-2029. Policy 8 requires these special qualities to be conserved and enhanced. With regard to the design of lighting, a considered and sympathetic approach should be taken to preserve the character and aesthetic appeal of the property. Proposals should adhere have regard to the Planning for the Conservation and Enhancement of Dark Skies in Wales Good Practice Guidance (PCNPA SPG). Care must be taken to prevent energy being wasted and limit any negative environmental impacts arising as a result of a property's contribution to light pollution.

B.7B.10 The use of external lighting should be avoided in all areas other than where it is necessary for safety or security reasons. Lighting should be suitably controlled so that lights are only switched on when they are needed, for example through the use of motion sensors and automatic timers.

B.8B.11 To limit a lighting system's contribution to light pollution, lighting should always be orientated in a downwards direction and be suitably shielded such that no light is emitted above the horizontal. External lighting should use switch-off, dimming or PIR sensors. Lighting should be of an appropriate luminosity, only powerful enough to light the desired area without spilling light into the surrounding environment. Light should be of a 'Warm White' in colour with a light temperature not exceeding 2700 Kelvin.

B.9B.12 To limit internal lighting light spill extensive glazing should be avoided. Blinds, curtains, external shutters and/or the use of tinted or electrochromic glass will be encouraged.

Removal of permitted development rights

B.10B.13 'Permitted Development Rights' allow specific types of development to

¹⁴ Pembrokeshire Coast National Park, A Partnership Plan for the National Park 2025-2029: <https://www.pembrokeshirecoast.wales/wp-content/uploads/2025/12/01-A-Partnership-Plan-for-the-National-Park.pdf>

take place without the need to receive planning permission for that work. Given that these proposals lie within the countryside when planning permission is granted to replace a dwelling, a planning condition ~~will~~may be appropriate be used to remove the permitted development right associated with adaptations, extensions and other relevant associated development to enable the National Park Authority to have control over any future developments that take place on the site. This means that any proposed development on the site for extensions and adaptations will be subject to a planning application.

Extensions

- ~~Where strong justification is submitted, it may be possible to support small additions to the original building as long as these additions have been designed in a way that is sensitive, subservient and in keeping with the original building.~~ Any extensions should add value to the building in terms of architectural design as well as a wider contribution to the local environment and should not result in unnecessary or excessive accommodation.
- B.1 ~~Extensions that may be considered suitable include modest additions, such as a small foyer or limited extensions to existing walls, where these would enhance the usability of key living spaces, including kitchens and bathrooms.~~

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[The Design Commission for Wales offers independent design advice and a national Design Review service to support high-quality, context-responsive development. Early engagement is encouraged, particularly for complex or sensitive conversion proposals.](#)

[Further guidance is available through their *Site and Context Analysis Guide* and *Design and Access Statement Guidance*.](#)

Parc Cenedlaethol Arfordir Penfro

Pembrokeshire Coast National Park



Pembrokeshire Coast National Park Local Development Plan 2

Planning for the Conservation and Enhancement of Dark Skies in Wales: Good Practice Guidance

**Supplementary Planning Guidance for lighting in the
Pembrokeshire Coast National Park**

Consultation 10 October to 5 December 2025

Adoption **XXX**

This item is also available in Welsh/ Mae'r eitem hon ar gael yn Gymraeg hefyd

Purpose and scope of this document

1. Access to dark night skies and reducing light pollution has many benefits. Humans rely on the natural cycle of day and night to determine our sleep patterns and waking behaviour, whilst many species of wildlife need dark skies to enable efficient feeding and breeding. Light pollution caused by Artificial Light at Night (ALAN) can cause a change in behaviour in both humans and wildlife, as well as wasting money and carbon.
2. Lighting associated with development can have significant negative impacts on biodiversity and landscape. However, reducing light pollution is often very simple and cost effective and delivers many benefits for both humans and wildlife. Access to dark night skies can also benefit physical and mental health as well as making spaces safer and providing opportunities for people to see the stars unimpeded by light pollution.
3. The purpose of this Supplementary Planning Guidance is not to eliminate lighting in the Pembrokeshire Coast National Park. It is recognised that lighting is required to meet health and safety requirements and to provide a level of lighting to enable people to live, work and visit the National Park. However, inappropriate or poor lighting design has a detrimental impact on the night sky and damages the special qualities of the National Park. The SPG provides guidance to everyone involved with development proposals on legal responsibilities, obligations and the conservation and enhancement of dark skies during the development process. The document provides guidance to developers on designing and submitting lighting assessments and plans that are appropriate in the National Park landscape, and to planners on assessing lighting schemes. Planning conditions and obligations may be used to regulate light in planning permissions.

National Planning Policy

4. The Environment (Wales) Act 2016 introduced a framework for decision-making to achieve the Sustainable Management of Natural Resources, ensuring the resilience of ecosystems and their benefits. The Act also sets a legal target of at least an 80% reduction in greenhouse gas emissions by 2050.¹

¹ [Environment \(Wales\) Act 2016](#)

5. Future Wales – The National Plan 2040: Policy 9- Resilient Ecological Networks and Green Infrastructure states that planning authorities should identify areas which should be safeguarded and created as ecological networks for their importance for adaptation to climate change, for habitat protection, restoration or creation, to protect species or which provide ecosystems services, to ensure they are not unduly compromised by future development; and identify opportunities where existing and potential green infrastructure could be maximised as part of placemaking, requiring the use of nature-based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and well-being. ²
6. Planning Policy Wales (Edition 12, February 2024) Section 6.8 recognises that there is a need to balance the provision of lighting to enhance safety and security to help in the prevention of crime and to allow activities like sport and recreation to take place with the need to:
- Protect the natural and historic environment including wildlife and features of the natural environment such as tranquillity;
 - Retain dark skies where appropriate;
 - Prevent glare and respect the amenity of neighbouring land uses; and
 - Reduce the carbon emissions associated with lighting.

Dark skies should be taken into account when preparing development plan strategies and policies and when considering individual development plan proposals.³

Local Development Plan Context

7. The Good Practice Guidance is adopted as Supplementary Planning Guidance for the Pembrokeshire Coast National Park and provides more detailed guidance on the way in which the Local Development Plan policies can be applied (in particular, Policy 8 Special Qualities, Policy 14 Conservation and enhancement of the Pembrokeshire Coast National Park, Policy 9 Light Pollution, Policy 10 Sites and Species of European Importance, Policy 11 Nationally Protected Sites and Species, Policy 29 Sustainable Design and Policy 30 Amenity).
8. Whilst only policies in the Development Plan have special status in deciding planning applications, (i.e. for the purpose of any determination under the Planning Acts, the determination must be made in accordance with the Plan

² [Update to Future Wales - The National Plan 2040](#)

³ [Planning Policy Wales - Edition 12](#)

unless material considerations indicate otherwise), Supplementary Planning Guidance may be taken into account as a material planning consideration.

9. National Park Partnership Plan 2025-2029: The National Park Authority maintains a list of special qualities, based on people's views and on formal landscape assessments. Conservation and enhancement of the special qualities of the National Park is a strategic aim of planning policy in the National Park. The list of special qualities is periodically reviewed and in 2024 people were asked what they consider the special qualities to be. Dark Skies were identified with a recognition that large area of the National Park are relatively free of light pollution. The National Park has eight Dark Sky Discovery Sites which are accessible and afford good views of the night sky on cloudless, moonless nights. Policy L2 of the National Park Partnership Plan 2025-2029 seeks to protect and enhance dark night skies.

Parc Cenedlaethol Arfordir Penfro

Pembrokeshire Coast National Park



Pembrokeshire Coast National Park Local Development Plan 2

Affordable Housing

Supplementary Planning Guidance

Consultation: 10 October to 5 December 2025

Adoption

This item is also available in Welsh/ Mae'r eitem hon ar gael yn Gymraeg hefyd

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1.0 Introduction

What is this Document?

- 1.1 This Supplementary Planning Guidance (SPG) is one of a series of SPG documents which provide detailed information on how policies contained in the Pembrokeshire Coast National Park's adopted Local Development Plan 2 (LDP 2) will be applied in practice by the National Park Authority.
- 1.2 Throughout this document, Pembrokeshire Coast National Park Authority will be referred to as the 'National Park Authority' and Pembrokeshire County Council will be referred to as the 'County Council'.
- 1.3 In accordance with Technical Advice Note 2 (Planning and Affordable Housing) (TAN 2), this Supplementary Planning Guidance provides detailed guidance on the issue of affordable housing. This is one of a range of community benefits that may be sought by the National Park Authority. Others might relate to open space, transport and education and are considered by a Planning Obligations Supplementary Planning Guidance.
- 1.4 The purpose of Supplementary Planning Guidance is to support and provide further detail on the implementation of the affordable housing policies in the adopted Local Development Plan 2. Technical Advice Note 2 (Planning and Affordable Housing) states that Supplementary Planning Guidance has an important role in providing policy guidance in conjunction with Planning Policy Wales (PPW) and the relevant Local Development Plan. paragraph 6.2 states:
"SPG can provide detailed information for developers, landowners, RSLs [Registered Social Landlords] and the public on how the Local Authority's planning policy on affordable housing will be delivered in practice."
- 1.5 With regard to securing affordable housing, paragraph 12.2 of Technical Advice Note 2 states:
"Development plans and/or Supplementary Planning Guidance (SPG) should set out the circumstances where local planning authorities will use planning conditions or planning obligations to ensure that the affordable housing provided is occupied in perpetuity by people falling within particular categories of need"

What are its Objectives?

- 1.6 The objectives of this Supplementary Planning Guidance are to:
 - 1) Enable developers and landowners to understand the National Park Authority's requirements in relation to affordable housing;
 - 2) Provide clear guidance on how the policies contained within the Pembrokeshire Coast National Park Authority's adopted Local Development Plan 2 will be implemented by the National Park Authority; and

- 3) Ensure a consistent approach to the interpretation of Local Development Plan 2 by the National Park Authority.

What is its Status?

- 1.7 The policies in Future Wales and the adopted Local Development Plan 2 have special status in deciding planning applications, (i.e. for the purpose of any determination under the Planning Acts, the determination must be made in accordance with the development plan unless material considerations indicate otherwise). Supplementary Planning Guidance forms a material planning consideration in the determination of planning applications. Put simply, the requirements of the legislation mean that the following need to be taken into account when considering a proposal:
 - Whether the proposal meets the requirements of policies within the development plan (both Future Wales and the adopted Local Development Plan 2); and
 - Weigh up all the other planning considerations to see whether they outweigh the conclusion of the Development Plan
- 1.8 This SPG will form a material consideration in the determination of all planning applications for new residential development, including applications for a proposed change of use to residential development and the conversion of appropriate buildings to a new residential use.

2.0 Context

Housing Need

- 2.1 The National Park Authority is not a housing enabler in its own right. This role is fulfilled by Pembrokeshire County Council, which holds the statutory housing functions for the National Park Authority area. Whilst this SPG deals specifically with the National Park, housing need is assessed by the County Council in its Local Housing Market Assessment¹.

Types of Affordable Housing

- 2.2 For the purposes of the land use planning system, affordable housing is defined as housing that is available exclusively to people in housing need that cannot afford to access the open market. Affordable housing is housing available for sale or rent at below market values and is required to remain as affordable for the initial and future occupiers [\(see Planning Policy Wales, paragraph 4.2.26\)](#). This is controlled by a Section 106 agreement² between the developer and the National Park Authority.
- 2.3 A broad definition of housing need exists, including households on means tested benefits and very low incomes for whom rented accommodation might be most appropriate, and those that are unable to access open market housing because of the gap between their incomes and house prices in the local area.
- 2.4 According to Technical Advice Note 2 there are two different types of affordable housing that are available to meet the spectrum of needs that exist:

Social Rented Housing

- 2.5 This comprises affordable homes that are available for rent below the market price. The housing is managed by a Registered Social Landlord, Pembrokeshire County Council or sometimes by private management companies or Community Land Trusts. Technical Advice Note 2 refers to these properties being rented at social rent levels.
- 2.6 The price at which affordable houses for rent are sold to operators is based on the Welsh Government's Acceptable Cost Guidelines (ACG), upon which a discount is applied. The developers will normally receive 42% of the Acceptable Cost Guidelines value for affordable housing for rent.³

¹ Local Housing Market Assessment, Pembrokeshire County Council 2023

² S106 of the Town and Country Planning Act 1990 (as amended)

³ Affordable Housing Study 2017, Pembrokeshire Coast National Park Authority: see paragraph 3.15

Intermediate Housing

- 2.7 Intermediate Housing can perform an important function as house prices or rents are between social rented homes and those on the open market. A number of different types of intermediate housing are available and demand for them can fluctuate, depending upon market area and economic conditions.

Intermediate Housing for Rent

- 2.8 Intermediate rents are higher than benchmark rents but below the value of Local Housing Allowance.
- 2.9 Whilst actual figures vary, rent charged is often 20-30% lower than would be demanded for a home in a similar area if renting from a private landlord.

Low Cost Home Ownership (LCHO)

- 2.10 This comprises affordable homes that are available for sale below the market price. This represents an affordable option for households that would like to own their property but are unable to purchase on the open market.
- 2.11 The price of low cost home ownership (LCHO) properties will most commonly be set by way of a defined percentage discount from open market values. The cost will typically be capped at a maximum of 70% of their open market value, as determined by an independent General Practice Chartered Surveyor who is active and experienced in the local residential sales market. The remaining cost of the property would be subsidised by the developer as their affordable housing contribution. In the event of any disagreement between the applicant and the National Park Authority arising from this valuation, either party may, at their own cost, seek an appointment by the President of the Royal Institute of Chartered Surveyors of an Independent General Practice Surveyor active and experienced in the local residential sales market whose opinion of value will be final and binding.
- 2.12 National policy in Planning Policy Wales (PPW) supports staircasing of shared ownership and LCHO to 100% ownership where there are secure arrangements in place to ensure the recycling of capital receipts to provide replacement affordable housing (PPW, edition 12, paragraph 4.2.27). ~~However, there would be limited opportunities where an RSL could demonstrate that capital receipts could be recycled to provide affordable housing~~The Authority will require evidence that the capital receipts could be recycled- within the same settlement. Where there is evidence of affordable housing need within the wider community council area or an adjoining community council within the National Park this may be acceptable in some circumstances. ~~In T~~he National Park there arehas limited opportunities for future development as the primary statutory purpose of the National Park is to “conserve and enhance wildlife, cultural heritage and natural beauty.” The National Park has limited landscape capacity to accommodate new development, coupled with a high level of affordable housing need. Proposals to staircase and recycle capital funding would require the identification of a replacement affordable

home which should be of a comparable build standard, preferably, to Welsh Development Quality Requirements (WDQR). Each case will be determined on its individual merits. ~~which forms the basis for requiring LCHO properties to remain affordable in perpetuity. LCHO proposals on affordable housing exception sites may be supported where appropriate mechanisms are in place to ensure that affordable housing restrictions are retained in perpetuity. LCHO properties on affordable housing exception sites are unlikely to be supported~~ (see paragraph 6.17).

Shared Ownership

- 2.13 This enables the occupier to purchase an equity share in their home, usually through a mortgage with rent being charged on the remaining share that they do not own. Over time, occupiers may be able to acquire additional shares up to a maximum that would be defined in the Section 106 agreement. The occupier pays rent to the RSL or Council on the remainder of the property value which is not within their ownership. Within the National Park, it is considered that there would be limited opportunities for sStaircasing to 100% ownership of shared ownership and LCHO. The Authority will require evidence that the capital receipts could be recycled within the same settlement, or where there is evidence of affordable housing need within the wider community council area or an adjoining community council within the National Park this may be acceptable in some circumstances. is unlikely to be practical given the limited opportunities to provide a replacement affordable property within the same settlement (see paragraph 2.12). Shared ownership proposals on affordable housing exception sites may be supported where appropriate mechanisms are in place to ensure that affordable housing restrictions are retained in perpetuity. Shared ownership on affordable housing exception sites are unlikely to be supported (see paragraph 6.17).

Self-Build

- 2.14 Self-build housing by individuals or by Community Land Trusts can make a positive contribution to meeting local housing need. Affordable self-build housing can contribute towards affordable housing requirements where the landowner/developer of a site provides a specified number of fully serviced plots. Delivery of self-build affordable units can be more difficult, particularly if plots are only made available to households on the affordable housing register, as some will lack the skills or financial resources, to undertake self-build. Therefore, the County Council has also taken the position that provided that an interested party can demonstrate clearly that they are in housing need, they do not actually need to be on the Common Housing Register to acquire self-build plots. A self-build affordable property will be required to be affordable in perpetuity and will be required to be sold to subsequent purchasers at a defined percentage discount from open market values, typically at a rate of 70% of Open Market Value, as determined by an independent General Practice Chartered Surveyor who is active and experienced in the local residential sales market. Other options may be considered if supported by evidence that the approach ensures that the property

will remain affordable in perpetuity. Self-build properties on affordable housing exception sites will require appropriate mechanisms to ensure that affordable housing restrictions are retained in perpetuity. ~~are unlikely to be supported~~ (see paragraph 6.17).

Community Led Schemes

- 2.15 Planning Policy Wales (PPW) identifies that affordable housing may also include community-led affordable housing, where it meets the definition of affordable housing (PPW, paragraph 4.2.26). All community schemes must provide housing that is affordable in perpetuity.
- 2.16 Community-led affordable housing can play an important role in affordable housing delivery where the community plays an integral role in identifying local community housing needs. They may also develop proposals or work with Pembrokeshire County Council, Registered Social Landlords (RSLs), landowners or small builders who may manage the development process. Community groups are encouraged to contact the Authority for further advice on suitable sites within their area.
- 2.17 There are different models of community-led housing, including Co-Housing which is a design-led approach that creates shared and private spaces to promote connectivity, inclusivity and mutual support; Housing Co-operatives where the organisation is owned, managed and controlled by its members; and Community Land Trusts, which are community-based legal entities established to provide and protect assets of community value, such as affordable housing. While the different models can differ in form and structure, all community-led housing should be characterised by community involvement, long-term ownership, management or stewardship of the homes and mechanisms to ensure that affordability is protected in perpetuity.

3.0 Policy Background

3.1 In Wales, there is a hierarchy of development plans:

- Future Wales, The National Plan 2040 (published by Welsh Government in 2021)
- Strategic Development Plans, to be prepared for the south west Wales region by the South West Wales Corporate Joint Committee
- Local Development Plans, prepared by local planning authorities

Future Wales

3.2 Future Wales: The National Plan 2040 is the national development plan for Wales and sets out the strategic direction for development in Wales up to 2040. Policy 7 'Delivering Affordable Homes' sets out the Welsh Government's policy to increase delivery of affordable homes. Local planning authorities are required to develop strong evidence-based policy frameworks to deliver affordable housing, including setting development plan targets based on estimates of housing need and local assessments. Local planning authorities should also "explore all opportunities to increase the supply of affordable housing".

Planning Policy Wales (PPW)

- 3.3 Planning policy on affordable housing is contained in PPW, Edition 12 (February 2024), Technical Advice Note 2: Planning and Affordable Housing (2006) and Technical Advice Note 6: Planning for Sustainable Rural Communities.
- 3.4 PPW states that a community's need for affordable housing is a material planning consideration that must be taken into account in formulating development plan policies. Paragraph 4.2.26 of PPW states:
- "Affordable housing for the purposes of the land use planning system is housing where there are secure mechanisms in place to ensure that it is accessible to those who cannot afford market housing, both on first occupation and for subsequent occupiers."*
- 3.5 PPW clarifies that affordable housing includes social rented housing owned by local authorities and registered social landlords; and intermediate housing where prices or rents are above those of social rent but below market housing prices or rent. All other types of housing are referred to as 'market housing'.

Technical Advice Note 2 (Planning and Affordable Housing)

3.6 TAN 2 provides technical guidance on the role of the planning system in delivering affordable housing. As well as defining affordable housing and

providing advice to local planning authorities on how to determine affordability (Para 3.1), TAN 2 also requires local authorities to:

- *Include an affordable housing target in the development plan which is based on the housing need identified in the local housing market assessment.*
- *Indicate how the target will be achieved using identified policy approaches.*
- *Monitor the provision of affordable housing against the target (via the Local Development Plan Annual Monitoring Report) and where necessary take action to ensure that the target is met (paragraph 3.2).*

- 3.7 In terms of affordable housing targets, TAN 2 explains that the affordable housing target should take account of the anticipated levels of finance available for affordable housing, including public subsidy, and the level of developer contribution that can realistically be sought (Section 9.0).

Technical Advice Note 6 – Planning for Sustainable Rural Communities

- 3.8 TAN 6 emphasises the need for planning authorities to employ all available policy approaches, in an innovative way, to maximise the supply of affordable housing. Additionally, a proactive and flexible approach should be applied by Local Planning Authorities including efficient working with local delivery partners, particularly registered social landlords. Investigating a broader range of delivery options is also of key importance.
- 3.9 Such methods could include community land trusts, private landlords and unsubsidised affordable housing where the affordable housing is provided by a developer, or directly by the intended occupier. (paragraphs 4.2.1 to 4.2.4).

Pembrokeshire Coast National Park Local Development Plan 2

- 3.10 The National Park Local Development Plan contains policies to seek and facilitate the sustainable delivery of affordable housing to meet local needs.
- 3.11 Policy 48 'Affordable Housing (Strategy Policy)' sets out the affordable housing requirement of 362 affordable homes within the Plan period as well as the policy approach to dealing with financial contributions. Policy 47 'Housing Allocations or Land with Planning Permission' sets out the affordable housing requirements for specific sites.
- 3.12 Policy 49 'Affordable Housing Exception Sites' also sets out the National Park Authority's approach to the release of land for affordable housing in exceptional circumstances
- 3.13 Policy 55 'Infrastructure Requirements' clarifies that where it can be proven that a proposal is unable to viably deliver the total amount of planning contributions,

priority will be given to the delivery of affordable housing in any further negotiation provided that it can be demonstrated that the proposal would not unduly overburden existing community infrastructure provision.

4.0 Affordable Housing Need in the Pembrokeshire Coast National Park

Local Housing Market Assessment

- 4.1 The latest Local Housing Market Assessment (LHMA) for Pembrokeshire provides evidence of need for affordable housing, the spatial need, numbers of bedrooms and affordable tenure required. This evidence must inform future development; is the primary source of evidence for identifying affordable housing need in Pembrokeshire.
- 4.2 The 2023 Local Housing Market Assessment has been prepared in accordance with the Welsh Government's prescribed methodology and template for calculating local housing need. The 2023 LHMA considered six housing delivery scenarios, comprising three demographic scenarios based on the Welsh Government's household projections and three local growth scenarios for Pembrokeshire (covering the local planning authority areas of the Pembrokeshire Coast National Park and Pembrokeshire County Council). Pembrokeshire has a high level of existing need for affordable housing, with over 5,000 households on the housing register.
- 4.3 The need for affordable social rented units accounts for approximately 70% of affordable housing need in the National Park, with approximately 30% need for intermediate rented properties. In the National Park, there was a minimal identified need for Low Cost Home Ownership (less than 1%) under the Pembrokeshire Growth Scenario of 435 homes per year (see LHMA, page 88 and 89).
- 4.4 The LHMA provides a breakdown of the requirement for social rented properties. Table 1 (page 88) shows a substantial need for one bedroomed properties in the National Park (75%), followed by two bedroomed units (13%), three bedroomed properties (7%) and the remainder of the need for four bedroomed dwellings.
- 4.5 The LHMA considered specific accommodation needs. In Pembrokeshire (including the area outside the National Park), there is a need for 11,158 adaptable homes built to Lifetime Homes Standard by 2036, which equates to approximately 18.3% of the total housing stock. By 2036, the net requirement for wheelchair accessible homes in Pembrokeshire is for 190 new wheelchair homes in the market sector and 221 in affordable accommodation.
- 4.54.6 Evidence of local housing need may be submitted by local communities or site promoters. Such evidence will be given weight in decision making where it has been prepared using a robust and transparent methodology and has been subject to appropriate scrutiny. The weight to be afforded to this evidence will be determined on a case by case basis.

5.0 Affordable Housing Requirements

Requirements for Affordable Housing in the National Park

- 5.1 This section sets out how the National Park Authority will approach the negotiation of affordable housing. Its starting point to negotiations is set out below:
1. The National Park Authority will seek to negotiate an affordable housing contribution on all residential development sites. This includes proposals for single new dwellings, the conversion of appropriate buildings to a residential use and applications for a change of use which creates a new residential unit/s. It will also include residential properties which are occupied as a sole or main residence (use class C3), a dwelling which is a second home and is occupied for 183 days or fewer (use class C5) or a short term let (use class C6). In circumstances where a proposed holiday let would be unsuitable for permanent habitation as a main residence (use class C3) and a planning condition has been considered necessary to limit to a C6 use only a contribution to affordable housing would not be required (see point 6 iv below).
 2. The affordable housing requirements on certain specified sites for residential development are provided on a site-by-site basis in LDP 2, Policy 47.
 3. The National Park Authority will use evidence on local housing need from the latest Local Housing Market Assessment (LHMA) for Pembrokeshire, the County Council's register of people that have expressed an interest in and are eligible for Low Cost Home Ownership, together with the ChoiceHomes@Pembrokeshire list, to seek an appropriate mix of affordable housing tenures on development sites. However, its starting point would be to seek a mix comprising predominately social rented properties in line with the need identified in the latest LHMA. Intermediate rented, shared ownership and LCHO may also be acceptable, in line with evidence of need in the latest LHMA.
 4. Policy 48 sets out the affordable housing requirements for windfall sites (i.e. sites other than those listed in Policy 47) for the eight housing market areas in the Plan area. It sets out the threshold for when affordable housing contributions will normally be expected on site rather than providing an affordable housing financial contribution.
 5. Policy 48 states that "when it can be demonstrated that on-site provision is not appropriate or where the proposal relates to the conversion of a building in the countryside, alternative forms of contribution, including off-site provision and commuted sums, will be sought." Sites for new residential development below the threshold for on-site provision, including single dwellings, the conversion of appropriate buildings in the countryside or the change of use of buildings to a residential use will be required to make a commuted sum contribution.

6. The commuted sum contribution sought will depend on the proposed floor area and location of the proposal (see Appendix 2). The Authority's Proposals Map identifies these areas. The calculation of the affordable housing contribution would take account of the internal area (all floors) of individual dwellings and garages. Areas used as balconies and car ports and other external spaces would not contribute towards the affordable housing contribution. There are certain developments that are exempt from this financial contribution. These comprise:

- Affordable housing for local people as defined in the Supplementary Planning Guidance;
- Replacement dwellings;
- Accommodation limited in its occupation by condition or legal agreement as an agricultural worker or manager's dwelling. In the event that appropriate rural enterprise workers cannot be found to occupy such a dwelling in the future, eligibility would then be extended to persons who would be eligible for affordable housing.
- Proposals for Use Class C6 (short term lets) and are not considered suitable for full time residential use or use as a main residence (use class C3), for example, where the size of the unit, or lack of outdoor amenity space would make it not appropriate for full time residential use and a planning condition limits the use to class C6 only.

7. Where the percentage of affordable housing required results in a number of units and a fraction of a unit the requirement will be rounded down e.g. 25% of 25 units = 6.25, therefore 6 affordable homes will be expected. Where the percentage of affordable housing required on sites is below the threshold as set out in policy 48 and would not result in a whole unit being delivered on site then a commuted sum affordable housing contribution will be expected, with the affordable housing contribution rate for the submarket area applied to each house. For example, St Brides Bay submarket area has a 20% affordable housing requirement so 1 dwelling in 5 dwelling development would need to be affordable and provided on site. A development of 4 dwellings or fewer would require a charge of £100 per square metre of each dwelling (see Appendix 2).

6.0 Delivery of Affordable Housing

Mix of affordable housing units

- 6.1 LDP 2 Policy 48 sets thresholds for the delivery of affordable housing units on site. The mix of affordable dwellings in terms of tenure, size and type is required to be delivered in line with the need identified in the latest local housing market assessment (LHMA).
- 6.2 It is recognised that the LHMA shows a high need for one-bedroom properties which is on average approximately 75% of the need, however, this varies by housing market area. It is acknowledged that this high level of need for one bedroom properties may not always be possible to deliver in accordance with LDP 2 Policy 52 Housing Mix which requires proposals to create balanced communities with a mix of dwelling sizes, types and tenures having regard to the current evidence of housing need in the National Park. The National Park Authority encourages pre-application discussions to ensure new residential developments provide an appropriate mix of housing.
- 6.3 The predominant need is for social rented housing (approximately 70%) of the total need for affordable housing. The precise nature of any intermediate tenure affordable housing should be supported by evidence of the local need from the LHMA. The LHMA shows a need for intermediate rented properties, but a very low level of need for Low Cost Home Ownership (less than 1%). Where shared ownership and Low Cost Home Ownership is proposed there should be consideration of local house prices and rents to ensure they will be providing an affordable product in the housing market area. Within the National Park, it is considered that there would be limited opportunities for staircasing to 100% ownership. Staircasing to 100% ownership of shared ownership and LCHO is unlikely to be practical given the limited opportunities to provide a replacement affordable property within the same settlement (see paragraph 2.12).

Design and space standards

- 6.4 Design considerations must be taken into account (see Technical Advice Note 12: Design and the relevant policies and supplementary planning guidance of the Local Development Plan), and factored into viability considerations. The National Park Authority is the planning authority for the National Park and development will naturally require a high standard of design due to the high landscape quality of the area. However, it is important to note that good design does not necessarily have to be expensive design. The Design Commission for Wales offers independent design support, including a Design Review service, which can offer constructive feedback on emerging affordable housing schemes. Early engagement with this service may assist prospective applicants in achieving a high standard of design.
- 6.5 It is a requirement for “all affordable housing, including that provided through planning obligations and planning conditions, must meet the Welsh Government’s

development quality standards” (PPW, paragraph 4.2.30). The Welsh Government Development Quality Requirements (WDQR 2021) ‘Creating Beautiful Homes and Places’ set out minimum space standards and technical specifications. New build affordable homes delivered through planning agreements (under Section 106) and planning conditions will only be required to meet the space requirements as set out in Appendix A and Appendix B of the WDQR. The Welsh Government will keep the standards under review and housing provision will be expected to meet the latest Welsh Government requirements and standards.

On-site affordable housing delivery

- 6.6 Welsh Government’s Technical Advice Note 2 (TAN 2): ‘Planning and Affordable Housing’ advises that affordable housing should normally be provided on site. This is acknowledgment that off-site provision may be acceptable in exceptional circumstances and where there is a clear advantage to the arrangement. TAN 2 states “The strong presumption is that affordable housing secured through planning obligations will be provided on the application site so that it contributes to the development of socially mixed communities. Development plans (or SPG) should set out the exceptional circumstances where provision may not need to be on an application site (for example where the management of the affordable housing cannot be effectively secured).” (paragraph 12.5).
- 6.7 The Authority will expect developments to deliver affordable housing on site, usually in the form of units built for and transferred to Pembrokeshire County Council, a Registered Social Landlord, or a Community Land Trust.

Off-site affordable housing delivery

- 6.8 LDP 2, Policy 48 ‘Affordable Housing (Strategy Policy)’ specifies that “where it can be demonstrated that on-site provision is not appropriate or where the proposal relates to the conversion of a building in the countryside, alternative forms of contribution, including off-site provision and commuted sums, will be sought”. The National Park Authority will require a developer or applicant to demonstrate why off-site provision would be more beneficial in terms of the viability and deliverability of development. Information should be provided to demonstrate the number of affordable homes that could be provided and the sustainability of development. Off-site contributions may be acceptable where:
- There are site specific circumstances which would make the affordable housing delivery and / or management extremely difficult. Evidence will be required to show that RSLs and Pembrokeshire County Council are unwilling to take on the affordable housing; or
 - Other exceptional circumstances as considered appropriate by the National Park Authority.

- 6.9 Where it is agreed by the National Park Authority that affordable housing provision cannot be secured on site, it is the Authority's preference for affordable units to be delivered on another site in the same settlement. If there are no suitable alternative sites within the same settlement, then a sequential approach should be undertaken to look for suitable sites within the town or community council area, or any adjoining town or community council area. There must also be evidence of need for affordable housing within the alternative settlement.
- 6.10 Where a suitable alternative site cannot be identified, a financial contribution made in lieu of on-site provision will be required. The National Park Authority will work with Pembrokeshire County Council as the Housing Authority which administers all affordable housing contributions, to ensure that the financial sum can be spent, where possible in the same settlement as the application site and using the agreed cascade mechanism. The financial contribution must be broadly the equivalent value to the provision of affordable unit(s) on site and will be secured via a Section 106 agreement attached to the planning permission.
- 6.11 The Authority will use the Welsh Government's latest 'Acceptable Cost Guidance (ACG) for the Social Housing Grant' as a way of calculating the offsite financial contribution.⁴ The ACG is based on the cost of developing a 'reasonable site' with no major abnormal costs and reflects the cost of building to the appropriate Welsh Government Development Quality Standards (WDQR) and Welsh building regulations.
- 6.12 As a transfer value, the developer would receive 42% of the ACG for affordable housing for rent from an RSL and the developer would be required to fund the remaining 58% of ACG.
- 6.13 ACG values ceased to include land costs from 2021 and the developer would also be required to contribute a financial sum towards land costs.
- 6.14 An example of calculating an off-site commuted sum requirement in lieu of on-site delivery is provided in Appendix 3. This commuted sum method will apply to new residential development. Where an off-site contribution is required in lieu of on-site provision for change of use schemes, the financial commuted sum would be calculated based on the floor area (see appendix 2, Table 12).

Mechanisms to Increase the Delivery of Affordable Housing

- 6.15 The National Park Authority is committed to ensuring the delivery of affordable housing to meet identified local needs and will give due consideration to the following mechanisms.

⁴ [Acceptable Cost Guidance for the Social Housing Grant | GOV.WALES](#)

Affordable Housing Exception Sites

- 6.16 The National Park Authority will support the principle of affordable housing on exception sites (see LDP 2, Policy 49, Affordable Housing Exception Sites). This constitutes development of affordable housing sites adjoining the Plan's Centres, which would not otherwise be allocated in the Local Development Plan, for 100% social rented or intermediate rented affordable housing. Open market housing will not be acceptable on such sites⁵ which would therefore not attract a residential land value. For this reason, the provision of 100% affordable housing schemes could be viable.
- 6.17 Technical Advice Note 2 'Planning and Affordable Housing' requires all affordable housing to be held in perpetuity and that there is no potential for an affordable home to become a market property on a rural exception site. TAN 2 states that "Rural exception sites are not appropriate for market housing. It is unacceptable to include clauses in planning obligations which would enable lenders of private finance to dispose of property on the open market as a last resort if a borrower were to get into financial difficulties.....Planning obligations should be used to set out a 'cascade' mechanism that will ensure that occupants are always found for affordable housing provided on rural exception sites." (paragraph 10.14). Mortgage companies typically require a Mortgagee in Possession clause, under which the mortgage lender would acquire the property if the owner were to default on their loan repayments. It has been the experience of the Authority that mortgage companies require a Mortgagee in Possession clause in which the mortgage company would acquire the property if the owner were to default on their loan payments. On affordable housing exception sites, Low Cost Home Ownership (LCHO) and Shared Ownership tenures may be supported where appropriate measures are in place to ensure restrictions are retained in perpetuity. This approach reflects national policy, including PPW (paragraph 4.2.35) and TAN 2 (paragraph 10.14), and avoids the use of Mortgagee in Possession clauses that could allow affordable housing to be lost from the local stock. A cascade mechanism in planning obligations must ensure occupancy by eligible households is maintained and not released as market housing. This clause has the potential to undermine the requirement for affordable housing to be held in perpetuity and could result in the release of market housing in the countryside, which would otherwise not have been suitable for market housing. Therefore, proposals for shared ownership or Low Cost Home Ownership, or any other intermediate products which require occupants to acquire a mortgage, would be unlikely to be supported on exception sites. Shared ownership or LCHO proposals on affordable housing exception sites will be required to ensure appropriate mechanisms are in place for affordable housing restrictions to be retained in perpetuity. Proposals that include a Mortgagee in Possession clause which could enable the loss of these restrictions are therefore unlikely to be supported.
- 6.18 In rural areas, the Rural Communities letting policy would be applicable which will give priority to those in housing need with a local connection to the area. See paragraph 9.16.

⁵ See Planning Policy Wales Edition 12, Paragraph 4.2.35

- 6.19 Proposals for affordable housing schemes on exception sites would be subject to all other development management criteria to ensure that they do not have an unacceptable impact upon the surrounding area. Typically, Registered Social Landlords have been unable to consider developing exception sites where land costs are more than £5,000 a plot.

Social Housing Grant

- 6.20 There has been a significant increase in the Social Housing Grant commitment from Welsh Government over the past few years, however, there are a high number of schemes requesting Social Housing Grant. The amount of affordable housing required in the National Park is greater than can be provided by public subsidy through Social Housing Grant and affordable housing delivery will also be reliant upon contributions made as part of open market residential development secured through a Section 106 agreement. Social Housing Grant will be used to develop additional affordable housing units in the National Park, including on appropriate exception sites. Social Housing Grant should not be used to provide affordable housing on a site where it is financially viable to deliver the affordable housing by a Section 106 agreement.

Tenure split

- 6.21 The National Park Authority recognises that the viability of affordable housing can depend upon the proposed tenure split. The LDP seeks a mix comprising 83% Social Rented properties with the remainder showing a need for LCHO (or similar scheme) (LDP 2, paragraph 4.281). Evidence from the 2023 LHMA shows a need for approximately 70% socially rented properties and approximately 30% intermediate rented properties, with a minimal identified need for Low Cost Home Ownership (less than 1%). Whilst recognising the importance of seeking to meet the need for different types of affordable housing, the National Park Authority will seek to apply an element of flexibility where possible, in respect of the split between different affordable housing sectors. However, proposals for a tenure mix which are contrary to the evidence would not be supported.

Self-build plots

- 6.22 In cases where it is proven that the development of affordable housing is not viable, the National Park Authority will discuss the potential opportunity for a developer to contribute to fully serviced building plots which might subsequently be developed by Registered Social Landlords or by persons on the affordable housing waiting list as self-build projects. Depending upon the value of the plots and the scale of any identified viability challenge, an affordable housing contribution might be sought alongside any serviced plots.

7.0 Economic Viability

Policy Requirements

- 7.1 Economic viability is of utmost importance in the delivery of housing and affordable housing in the National Park. The thresholds and percentages of affordable housing set out in LDP 2 Policy 48 'Affordable Housing' have been set in accordance with evidence from the Viability Assessment undertaken for LDP 2 by Dr. Andrew Golland and used the 'Wales Development Appraisal Toolkit' (formerly known as the Three Dragons Toolkit) (DAT). The policy requirements have been subject to independent examination.
- 7.2 Policy requirements for planning obligations and affordable housing will have an impact on land values and landowner expectations. Applicants are expected to have considered in full the overall cost of development, including the required policy-based planning obligations set out in LDP 2 and any reasonably known abnormal costs, when negotiating the purchase of land.
- 7.3 Where a site is still under option by a developer, it will always be expected that the policy requirements can be met, provided that the scheme is not abnormally costly or abnormally under value for the area. These costs must be reflected in the price that the developer purchases the site for, so ensuring that the proposed development site is economically viable to meet the policy requirements for affordable housing. If there is any doubt about viability on a particular site, it will be the responsibility of the developer to offer the landowner a lesser price for the site, or to maximise the mix of market units on site to achieve the affordable housing policy requirements.
- 7.4 The Authority's policy requirements (set out in policy 48, or policy 47 if the site is a housing allocation) should be the starting point for applicants and viability appraisals should subsequently work backwards from this. The Authority will expect land transactions to reflect policy, rather than the other way round.

Economic Viability Assessment (EVA)

- 7.5 In line with national planning policy, it should not be necessary for viability issues to be considered further. The applicant must demonstrate particular exceptional circumstances to justify the need for a viability assessment at the planning application stage (PPW, paragraph 4.2.22). Viability assessments will be limited to sites where there is a policy challenge, or where there are exceptional, unforeseen circumstances outside the scope of normal market risk, or where a recession or similar significant economic changes have occurred since the plan was adopted. Any deviation from the policy requirements will be required to be supported by a viability assessment which will be subject to an independent assessment.
- 7.6 Judgements about viability can only be made by the National Park Authority on the basis of full and robust development appraisals. Therefore, it is important that

these are provided where the up-to-date policies of the Local Development Plan are challenged.

- 7.7 Assessments which provide robust and detailed information will be dealt with positively and efficiently by the National Park Authority. This process will include a thorough appraisal of the scheme economics and will require co-operation and an open book approach between the applicant, developer or landowner and the National Park Authority. The level of detail required in the EVA is provided in Appendix 1.
- 7.8 Failure to provide adequate detail can result in the National Park Authority asking for further information which can lead to delay, or ultimately, the refusal of planning permission.
- 7.9 The National Park Authority uses an independent viability assessor. With the permission of the proposer, the work will be carried out at a cost to the proposer. The process is as follows for the Pembrokeshire Coast National Park Authority:
- Application received, possibly with an economic viability assessment.
 - The National Park Authority will advise the applicant if they wish to have viability assessed they will have to pay a fee to the independent assessor or advise them of the contribution required in line with Supplementary Planning Guidance.
 - Information is sent to the independent assessor asking for a quote for an Economic Viability Assessment and the Authority will advise the independent assessor of the LDP policy requirements for affordable housing and any other Section 106 contributions.
 - Once a quote has been received this is sent to pre-applicant/applicant for payment.
 - Once payment is received the Authority will advise the independent assessor to progress the assessment, which generally takes a minimum of 4 weeks.

Positive approach to viability negotiation

- 7.10 The National Park Authority recognises that economic viability is a key factor in delivering affordable housing. The National Park Authority will adopt a positive approach to negotiation to consider viability issues but will expect a robust and comprehensive viability submission to accompany pre-application submissions seeking to challenge up-to date development plan policies.

Considering Alternatives

- 7.11 The National Park Authority welcomes the opportunity for pre-application discussion to agree design principles for a site's development. Within this framework the National Park Authority will adopt a positive approach towards the consideration of alternative methods and will expect applicants to have demonstrated how they have improved the viability of schemes by considering alternative design. The applicant should consider the following factors to improve a scheme's viability.

- Amount (different densities and number of units);
- Type (different type of dwellings);
- Size (different dwelling sizes);
- Tenure (type and tenure mix);
- Layout and density (careful consideration of layout can improve value);
- Design and specification (challenge expensive aspects of the scheme's build costs and test costs associated with design aspects which are not essential); and,
- Phasing (careful phasing can help improve cashflow).

Alternative options to deliver affordable housing

7.12 Where a scheme is demonstrated to be unviable with the policy level of affordable housing, the National Park Authority will sequentially consider a range of alternative options to secure the maximum level of affordable housing. These will vary depending on site specific circumstances and constraints but will include:

- Consideration of alternatives;
- The use of public subsidy, if available;
- Revised tenure mixes;
- Consideration of alternative provision, for example off-site provision or financial contributions or serviced plots;
- Reduction of other planning obligation contributions (provided that it can be demonstrated that the proposal would not unduly overburden existing community infrastructure provision); and,
- Mechanisms to reappraise schemes at specific development milestones or time-periods.

Failure to deliver affordable housing

7.13 If a scheme is not financially viable, development will not be realised, and therefore, there will be no planning gain, either in the form of affordable housing or other Section 106 contributions. The absence of affordable housing provision or commuted sum contribution would be considered a significant policy departure from the requirements of LDP 2. A strategic objective of LDP 2 is to deliver market housing in order to facilitate the provision of affordable housing to meet the needs of local communities. LDP 2, Policy 52 (Housing Mix) states that "in order to ensure the creation of balanced communities all new housing development will be required to include a mix of dwelling sizes, types and tenures having regard to the current evidence of housing need in the National Park." The reasoned justification to the policy in paragraph 4.298 states "The Plan's strategic objective for housing is to facilitate the delivery of affordable housing needs. Proposals that are unable to contribute to the delivery of sustainable well-

balanced communities by including on site provision of affordable housing or contributing financially to the delivery of affordable housing by way of a financial contribution will not be permitted unless exceptional circumstances are demonstrated.”

8.0 Legal and Section 106 Agreements

- 8.1 Prior to obtaining planning permission, an applicant will be required to enter into a legal agreement to ensure the delivery of the affordable housing, either through a unilateral undertaking or under Section 106 of the Town and Country Planning Act 1990 (as amended).
- 8.2 All schemes, including affordable housing led schemes which may be 100% affordable housing development will be required to contribute to planning obligations, which may include, but is not limited to, highway improvements, open space and education provision.
- 8.3 A unilateral undertaking is an option if only a monetary contribution is required and is relatively straightforward to complete. This agreement is entered into by the landowner and any other party with a legal interest in the site. The unilateral agreement will require that the development permitted shall not be occupied until the affordable housing contribution has been paid.
- 8.4 A Section 106 agreement is required between the National Park Authority and developer when there is a transfer of affordable units, or agreement to pay a financial contribution towards affordable housing and other planning obligations.
- 8.5 The precise wording of the Section 106 agreement will depend on the individual application. However, Section 106 legal agreements will normally include clauses setting out requirements with regard to the following:
 - The number and percentage of affordable housing units, tenure, type, size and location within the development site;
 - The timing or phasing of the construction and occupation of affordable homes. Trigger points will be identified when affordable housing must be provided in relation to development of the whole site. There may also be appropriate restrictions on the occupation of market housing;
 - The transfer arrangements for the land or affordable housing to an RSL or Pembrokeshire County Council, including transfer price and timing;
 - The arrangements for the affordable housing to be retained in perpetuity for the lifetime of the development regarding the future affordability, control and management and ownership of the affordable housing;
 - The minimum design and build standards required for the affordable housing units;
 - Occupancy conditions or local connection criteria;
 - Arrangements for the provision of financial contributions in lieu of on-site provision in exceptional circumstances and arrangement for unusual circumstances such as mortgage default;
 - Arrangements for repayment of affordable housing contributions if the contribution is not utilised within a set time period;

- With outline applications, where the proposed number of dwellings is not known, but where there is a likelihood that the site threshold will be exceeded, the agreement will ensure that the appropriate proportion of new housing will be affordable. Details of the unit types, sizes, tenure and siting would be provided on a subsequent reserved matters application.

8.6 When a commuted sum payment towards affordable housing is required, in the first instance, spend will be restricted to the local Community Council area and land within adjacent Community Councils which lies within the National Park. Any land in these Community Councils which lies outside the National Park would be excluded. *If, following 3 years, no suitable scheme has been commenced and the sum has not been spent, the contribution may be spent on any Affordable Housing scheme across the whole of Pembrokeshire (including the area outside of the National Park) for a further 2 years. If following a total of 5 years from receipt of the original sum the contribution has not been spent, it will be returned to the developer at a rate adjusted to reflect inflation over 5 years.*~~If the money is not spent within three years in the local area (as defined above) the money should be made available to spend on the delivery of affordable housing in the remainder of the Community Council area and adjacent Community Council area if outside the National Park⁶. This would acknowledge the fact that there are some split settlements where it would be reasonable to allow spend in the same locality to meet the need. If not spent within 5 years then it should be returned to the applicant.~~

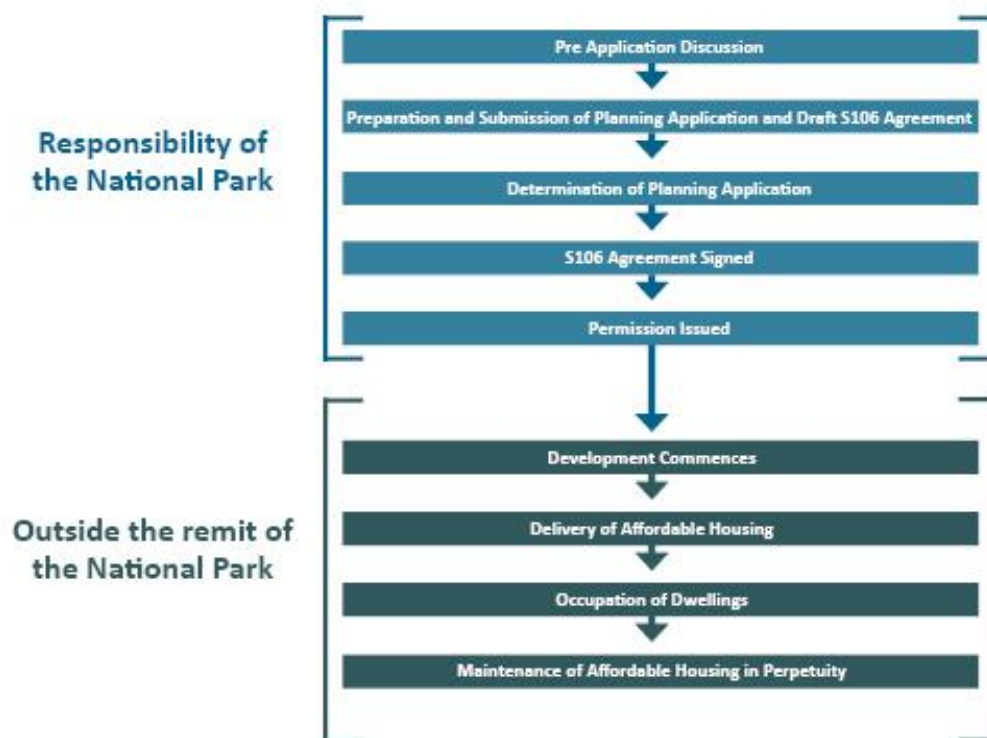
⁶ ~~Excluding the main towns of the County, Haverfordwest, Milford Haven, Pembroke / Pembroke Dock, Neyland, Fishguard & Goodwick.~~

9.0 Affordable Housing Planning Process

Process for preparing and submitting a planning application

- 9.1 This section outlines the process of preparing and submitting a planning application for residential development that includes an element of affordable housing. It also explains the technical process in a simple manner and provides useful tips on how to negotiate the process smoothly without potential delay. The diagram below shows what stages of the planning process are the responsibility of the National Park Authority and what lies beyond the National Park Authority's remit.

Table 9.1 Planning Process



Pre-Application Discussion

- 9.2 This stage will provide useful information for the applicant regarding what is required in terms of affordable housing. The pre-application discussion will provide an opportunity for the amount and type of affordable housing to be explained and agreed from the outset. This is to help provide a better understanding of the housing requirements and the overall layout and viability of the proposal.
- 9.3 Engagement at this stage is encouraged as it can help to avoid delays in the formal determination process as issues relating to affordable housing and other Section 106 requirements and development viability can be discussed prior to the

development scheme being fixed. The National Park Authority can also explain to the applicant how to complete a draft Section 106 Agreement prior to submission of an application. The National Park Authority offers a statutory pre-application service for a fee or a more comprehensive pre-application advice service which incurs a higher fee. Details can be found on the National Park Authority's website.

Preparation and Submission of Planning Application

- 9.4 The preparation and submission of the planning application is an important stage.
- 9.5 This stage provides an opportunity for a Unilateral Undertaking or draft Section 106 Agreement to be submitted alongside the planning application. The early submission of a draft Agreement will enable negotiations on its contents to take place during the determination stage and thereby ensure that planning permission can be granted more quickly.
- 9.6 To help ensure a smooth determination, the National Park Authority advises applicants to use the standard Section 106 template. The County Council will prepare legal agreements on behalf of applicants. The County Council's legal costs are a standard £500 charge. The County Council does, however, reserve the right to increase the costs in the event of complicated agreements or protracted correspondence.

Determination of Planning Application

- 9.7 Planning permission will be granted when the Section 106 agreement is signed.
- 9.8 If the Section 106 agreement is not signed within the 8 week determination period for the application (or in exceptional circumstances within a longer period where agreed in writing with the National Park Authority) the National Park Authority will refuse the planning application.

Delivery of Affordable Housing

- 9.9 The delivery of affordable housing should keep pace with that of market housing. On larger schemes, the National Park Authority may wish to ensure that affordable housing is delivered in phases in parallel with the development of market housing, and will look to see this reflected in Section 106 planning agreements. The standard approach is for Section 106 agreements to include a clause requiring a reasonable amount of affordable units to be occupied before market housing can be occupied.

Maintenance of Affordable Housing

- 9.10 The future affordability, management and ownership of any affordable dwellings will be ensured in perpetuity through the imposition of planning Section 106

agreements which shall be applied to planning permissions. Section 106 agreements will apply to successive owners.

- 9.11 The National Park Authority has a standard Section 106 template in place and the content will be agreed by the landowner and/or prospective developer in advance of planning consent being granted. However, the National Park Authority recognises that the Section 106 agreement needs to be flexible to respond to changing circumstances and will discuss proposals for amendments to the Section 106 agreement with applicants. Evidence to justify any revisions to a Section 106 agreement will be sought by the National Park Authority.

Who can occupy affordable housing?

Social Housing

- 9.12 The criteria for assessing housing needs are set out in the ChoiceHomes@Pembrokeshire Allocation Policy. The criteria is based on points such as:
- Customers who are currently unintentionally homeless;
 - Customers sharing accommodation with family and / or friends and / or others who will not be rehoused with the customer; and,
 - Customers that need to move because they cannot afford to live at their current accommodation.
- 9.13 A full list of the criteria can be found at the Choice Homes Pembrokeshire website.
- 9.14 Pembrokeshire County Council agreed in 2024 to introduce tighter eligibility criteria to join the housing register to ensure that social housing is going to those in the county with the most housing need. The criteria is narrowed to residents from Pembrokeshire or who have a connection to the county with an identified need for social housing. When a customer is accepted onto the Register they will be placed in one of three 'bands'. Which band will depend on the customer and their households housing need, based on the information provided on the application form. Customers in Gold and Silver bands are classed as being in housing need and those in Bronze as low priority need.
- 9.15 When a property is advertised, customers on the Register who would like to live there can apply for the property. The customer with the highest need and the earliest date of application will then be offered a tenancy.
- 9.16 The ChoiceHomes@Pembrokeshire has a Rural Communities Policy applicable to certain areas in Pembrokeshire which requires customers to demonstrate they meet certain criteria. Households who demonstrate these criteria are given additional preference in respect of properties advertised for letting to those with a local connection to that area – see paragraph 13.5 of The ChoiceHomes@Pembrokeshire Allocation Policy.

Affordable Rental and Low Cost Home Ownership

- 9.17 Where a Trust or private management company manages affordable rented homes, or the properties are for sale, they will be made available to local people in housing need, using a time-restricted cascade approach which gives the first opportunity to acquire the property, to those most local. The National Park Authority's definition of local, for affordable housing purposes is as follows:
- In the first instance, the applicant will have a connection (See paragraph 9.16 above) to the town or community council area⁷ in which the property is located or any adjoining town or community council area to that in which the property is located, including those in neighbouring local planning authority areas;
 - After a defined period of time, the search for an occupant will be extended to the rest of Pembrokeshire.
- 9.18 The length of time that a property must be advertised and available for is set out below:

Table 9.2 Affordable Rental and Low Cost Home Ownership Advertisement Requirements

Cascade Level	Affordable Rent	Low Cost Home Ownership
Local/neighbouring Town or Community Council area ⁸	6 weeks	6 weeks
Remainder of Pembrokeshire and simultaneously offered to the Authority and RSL to purchase at 42% of ACG for rental properties and 70% of market value for LCHO	6 weeks	6 weeks
Total marketing time ⁹ before seller may offer the property on the open market	12 weeks	12 weeks

- 9.19 If a qualifying occupier for an affordable property has not been found within the first stage of the occupancy cascade, the County Council and RSLs will be given an opportunity to purchase the property at the same time as the qualifying area is extended county wide, as a means of giving every opportunity to keeping the dwelling affordable. Should the second stage be unsuccessful the property may be offered for sale on the open market, on the basis that the definition of qualifying occupier shall be extended for the proposed sale to mean "any willing

⁷ Excluding the main towns of the County, Haverfordwest, Milford Haven, Pembroke / Pembroke Dock, Neyland, Fishguard and Goodwick.

⁸ Excluding the main towns of the County, Haverfordwest, Milford Haven, Pembroke / Pembroke Dock, Neyland, Fishguard and Goodwick.

⁹ Marketing time is the time during which the property is advertised prior to the receipt of an offer. If a sale or rental agreement collapses, the cascade approach and time available for marketing begins again.

purchaser". Any such sale shall be subject to provisions required by the National Park Authority to protect its future affordability (such as including limiting any resale price).

- 9.20 The National Park Authority will monitor and review the operation of the criteria used and the results of the cascade approach and may alter these to meet the general aim of ensuring that affordable housing is efficiently allocated and fully utilised.
- 9.21 A person in financial need is an applicant who after financial assessments cannot afford to resolve their situation without subsidy or assistance or that the applicant does not have sufficient money to pay for the option chosen.
- 9.22 The ability to resolve affordability issues on the open market will depend on the relationship between the amount that the household is able to afford and the cost of appropriate local housing.
- 9.23 For someone on a single income if the price of suitable housing is equal to or less than three times their gross salary then it is affordable.
- 9.24 For someone looking for housing with a partner, relative or friend if the price of suitable housing is equal to or less than 2.5 times the joint gross salaries or 3 times the higher salary plus 1 times the lower salary, whichever is the higher, it is affordable.

Appendix 1 Development Viability Appraisal Guidance and Checklists

1. When an applicant wishes to challenge the affordable housing policy requirements they will be required to submit an economic viability assessment. This process will include a thorough appraisal of the scheme economics and will require co-operation and an open book approach between the applicant, developer or landowner, the planning authority and an independent viability assessor appointed by the Authority.
2. Challenges on viability grounds can significantly prolong the determination process. Failure to provide adequate detail can result in the authority asking for further information which can lead to delay, or ultimately, the refusal of planning permission.
3. The National Park Authority recognises that on occasions there will be disagreement with the applicant.
4. The viability of a development should be assessed using the residual valuation approach, which is based on the amount remaining after the Gross Development Costs (GDC) of a development is deducted from the Gross Development Value (GDV) taking into account an appropriate level of developer's profit/return.
5. Some of the key aspects and principles involved in a viability assessment are summarised below.

Land value negotiations in purchasing land should take into account full planning policy requirements (such as affordable housing contributions and other Section 106 contributions) any other known cost requirements and any known abnormal site conditions or constraints into account, and should be based on the existing land value, along with a reasonable level of uplift to incentivise the landowner to sell.

House values should be based on prices paid on comparable development schemes taking into account the type and locations of properties involved and should reflect an appropriate mix of housing types and tenure. Projected values of affordable housing units to be transferred to an RSL or Pembrokeshire County Council should take into account transfer values that the developer would receive. Social rented properties would be transferred at 42% ACG and 70% open market value for intermediate properties, including LCHO. Where applicable, any other revenues, such as social housing grant or ground rents should also be included.

Build costs should normally be based on site specific evidence, including reported cost estimates or invoices, and they should not normally exceed the published Build Cost Information Service (BCIS) median data reflecting the type of housing proposed and size of development site. Sprinkler costs are included in BCIS cost data for Wales.

Other normal costs associated with development include roads, parking, footpaths, drainage, services, landscaping, drainage, flood prevention, archaeological investigation, ecological mitigation, and associated surveys, and should be based on detailed site-specific requirements.

Abnormal site costs associated with the development are usually seen as costs which could not have been reasonably anticipated in advance or are of a highly exceptional nature (and which would not be included within the BCIS rate). Typically, abnormal costs may constitute items such as unusual site levelling, demolitions, additional foundation costs where ground conditions are poor, provision of roundabouts/traffic lights for site access, cost of remediation for contaminated sites etc.

Other section 106 contributions should be accounted for as an anticipated cost and should be based on the requirements set out as part of a proposed planning obligation and by reference to the relevant obligations set out in the Planning Obligations SPG.

Developer profit should reflect the size, characteristics and risk associated with the development/developer involved. RICS guidance indicates an assumption of 15-20% of gross development value (GDV) may be considered a suitable return to developers, but developers may choose to apply alternative figures where there is evidence to support this according to the type, scale and risk profile of the planned development. For example, a lower figure may be more appropriate for delivery of affordable housing, or for single housing units in circumstances where this guarantees an end sale at a known value and reduces risk.

6. The Viability Assessment that was undertaken for LDP 2 should be referred to for further detail as to the values and costs accounted for within the LDP's evidence base¹⁰. Where figures accounted for within a site-specific financial viability appraisal differ significantly from those included within the LDP's viability evidence, this should be fully explained and evidenced on a site-specific basis.
7. The following information will enable an Independent Financial Viability Assessor to carry out an assessment of the development viability of a particular scheme in order to assess the viability of providing contributions required towards affordable housing and other contributions (as set out in the Planning Obligations SPG). This information should be submitted by the applicant/developer in the form of a Financial Viability Appraisal.

¹⁰ [Background papers - Pembrokeshire Coast National Park](#)

Financial Viability Appraisal Checklist

- ✓ Postal address and proposed plans of the scheme, inc. planning application reference.
- ✓ The size (gross and net) and characteristics of the site.
- ✓ Description of the proposal e.g. redevelopment, conversion, proposed uses, number of units.
- ✓ Gross internal floor space area of the proposed housing.
- ✓ Affordable housing policy requirements.
- ✓ Any planning obligations required e.g. infrastructure, open space, education, etc.
- ✓ Overview of the factors restricting full delivery of planning policy requirements.
- ✓ Site acquisition cost, stamp duty, and VAT paid.
- ✓ Opinion of the site's Benchmark Land Value along with the reasoning for this.
- ✓ Full details of costs and values associated with the development (see template below).
- ✓ Total development period, build period, phasing, sales period and start/finish dates
- ✓ Any other relevant supporting evidence.

Viability Appraisal Checklist template

1. Overview of Development Proposal		
Brief description of the proposed development or redevelopment	Including site area (hectares), development details and reasons why the applicant considers there is an economic case for lower levels of contributions or Affordable Housing than those sought.	
Address and Site Location Plan	With a site boundary plan including the GROSS site area (GA) in hectares/acres and NET development area (NDA) in hectares/acres.	
Total Number of Dwellings	Type, square metre size, number of beds and mix, including proposed number, type, size and mix of Affordable Housing.	
Total Gross Internal Area (GIA)	Calculated in accordance with the RICS code of measuring practice to the new buildings to be built/converted/refurbished (in square meters/square ft).	

2. Details of Current Use of the Site and Planning Uses		
Current Use Planning Approval (number if relevant)		
Current Planning Use Type		
Site Acquisition Cost:	Include details on stamp duty, VAT etc.	
Current Value of Site for Existing Planning use/Benchmark Land Value (BLV)	Supported by professional evidence and assessment at the date of the appraisal with comparables.	

3. Development Revenues		
Market Values	Market values of sale units (per unit or by size of unit per sqm basis) with total revenue for the whole site together with a summary sales specification indicating the car parking (number and type) to be provided per unit; also include details of ground rents, service charges etc.	
Sales Revenues	For other mixed-use elements with calculation to give capital values including rental stream and yields used.	
Sale of Affordable Housing units	The affordable housing payments to be made.	
Value of Ground Rents / Leases		
Service Charge Information		
NB. All sales information should be supported by professional evidence of values for comparable units in the area of the development, for independent verification on a unit-by-unit basis (e.g. 2 person 1 bedroom flat with balcony, view, car space etc.).		

4. Development Costs		✓
Build Costs	Building Cost of units, with detailed cost plan to support the headline costs being used.	
Site Infrastructure Costs / External Works	I.e. roads, sewers, services, highways/access, landscaping, connections etc.	
Abnormal Costs (if applicable)	With supporting professional evidence.	
Contingency Sum or		
Development Costs	Professional fees identified by specialism together with supporting information of appointment.	
This should include:	% of:	
Professional Fees	Base build cost	
Agency & Marketing (Open Market housing)	GDV	
Agency & Marketing (Affordable housing)	GDV	
Agency & Marketing (Commercial development)	GDV	
Legal Costs Associated with Disposals	% GDV or £'s per unit	
Finance – Debit interest	Borrowing	
Finance - Credit interest	Any development surplus	
Developer's Return (profit) for Open Market Housing	GDV or cost	
Developer's Return (profit) for Commercial Development	GDV or cost	
Other (please specify)		

Other Costs	Planning fees, site investigations, building regulation fees, NHBC	
Off Site Works	If relevant.	
S106 Allowances	Commuted sum contributions for all Planning Obligations, other than Affordable Housing, with brief summary of items.	
Finance Costs	Cost of financing scheme over development period including funding fees giving interest rate assumptions based on monthly costs; include details of total development period, construction period for the development and sales period for the development.	
Profit	Anticipated profit margin/return(s) i.e. Profit on cost/ revenue.	
Residual Land Valuation	Anticipated land value based on a residual valuation approach.	
Provide evidence to support costing. This should include a detailed breakdown of costs from appropriate professionals, and a method statement of how costs have been calculated. Any provisional sums should be clearly shown. Figures for comparable schemes should also be supplied.		

5. Other Information Required	
Most Recent Scheme Plans.	Relating to planning application and updates.
Cash Flow Data	Provide the full cash flow for the scheme.
Programme Timescales	Land acquisition date Total development period Construction start and finish dates Sales start and finish dates

Appendix 2 Provision of affordable housing and affordable housing contributions

This appendix sets out the requirements for new housing sites not allocated in Local Development Plan 2.

Housing sub-market areas

- For windfall housing sites (those not already allocated in the Local Development Plan), the percentage of financial affordable housing contributions for on-site provision is set out in Table 12. For sites, below the threshold where on-site provision is not possible, a commuted sum financial contribution is required, based on a calculation of the area of the dwelling. The financial contribution varies depending on the location of the proposal.
- This is done by dividing the National Park area into housing sub market areas, which group areas with similar housing market conditions together to take into account the market values achievable in those areas and the effect that has on development viability.
- The following table is taken from Local Development Plan 2 Table 12 and sets out the percentage provision and rate of affordable housing contribution the Authority considers reasonable for each of the housing sub-market areas. The final column sets the level of financial contribution considered appropriate for that area.

Table 12 Percentage of Affordable Housing for Housing Submarket Areas from Local Development Plan 2

(Last column – financial contribution added for this Guidance)

Housing Submarket Area	Post Code Area	Local Centre	Rural Centre	% of affordable dwellings (threshold for delivery on site)	Financial Contribution Rate m²
Newport	SA42 0	Newport	Dinas Cross Nevern	50% (2)	£250
Tenby	SA70 7	Tenby	Jameston Lydstep Milton Manorbier Manorbier Station	50%(2)	£250
South East Coast	SA69 9 SA70 8 SA67 8 SA34 0	Saundersfoot, Tenby	Amroth Carew Jameston Milton New Hedges Pleasant Valley Wiseman's Bridge	50%(2)	£250
St Davids and North Coast	SA62 6 SA64 0 SA62 5	St Davids	Roch, Newgale, Porthgain Solva, Trefin, Square and Compass	35%(3)	£175
South West Coast	SA71 5	N/A	Angle Bosherston Castlemartin Lamphey	25%(4)	£125
St Brides Bay	SA62 3 SA73 3	N/A	Little Haven Broad Haven Dale Marloes Nolton Haven	20%(5)	£100

Housing Submarket Area	Post Code Area	Local Centre	Rural Centre	% of affordable dwellings (threshold for delivery on site)	Financial Contribution Rate m²
			St Ishmaels Herbrandston		
Estuary Hinterland	SA68 0 SA62 4 SA73 1 SA72 4	N/A	Cosheston Cresswell Quay Hook Lawrenny Llangwm Houghton	15%(7)	£75
North East NP	SA65 9 SA43 3 SA41 3 SA63 4 SA66 7	Crymych	Felindre Farchog Moylegrove Mynachlogddu Pontfaen Rosebush	15%(7)	£75

Local Development Plan 2 Policy 47 Housing Allocations or Land with Planning Permission for 5 or more dwellings

Policy 47	Housing Allocations or Land with Planning Permission The following sites are allocated for housing or have planning permission for housing for 5 or more dwellings:					
Location Proposals Map ID	Site Name	Hectares	Indicative Affordable Housing Requirement	Estimate Market & Affordable (Allocation) or Permission	Estimate Affordable Housing Figure (Allocation) or Permission	Anticipated Delivery by 2031 ¹¹ (Affordable element in brackets)
Newport						
HC1 ¹²	North of Feidr Eglwys	1.5	40%	35	14	35(14)
HC2 ¹³	Parrog Yard & Pottery Site	0.24	66%	12	8	12(8)
HA1	Land North of the Business Park	0.5	50%	15	8	10(5)
Saundersfoot						
HA2	Land at Sandy Hill	2.26	35%	68	24	68(24)
HA3	North of Whitlow	1.8	35%	54	19	54(19)

¹¹ Taken from Appendix 2 of the Housing Background Paper

¹² Figures reflect planning permission NP/15/0194

¹³ Figures reflect planning permission NP/17/0301

Policy 47	Housing Allocations or Land with Planning Permission The following sites are allocated for housing or have planning permission for housing for 5 or more dwellings:					
Location Proposals Map ID	Site Name	Hectares	Indicative Affordable Housing Requireme nt	Estimate Market & Affordable (Allocatio n) or Permissio n)	Estimate Affordabl e Housing Figure (Allocatio n) or Permissi on)	Anticipat ed Delivery by 2031 ¹¹ (Affordab le element in brackets)
HA4	Penny Farm	1.13	40%	36	14	36(14)
St Davids						
HC3 ¹⁴	West of Glasfryn Rd	3.34	54%	90	49	70(38)
Broad Haven						
HC4 ¹⁵	South of Driftwood Close	0.66	35%	18	6	18(6)
HA5 ¹⁶	North East & South East of Marine Rd	3.14	34%	87	30	65(22)
Herbrandston						
HC5			0%	3	0	

¹⁴ NP/18/51 Resolution to grant planning permission subject to a S106 agreement includes 70 residential units in total which includes 38 affordable housing units.

¹⁵ Figures reflect planning permission NP/17/315

¹⁶ Pre-application discussions/Local Development Plan viability information.

Policy 47	Housing Allocations or Land with Planning Permission The following sites are allocated for housing or have planning permission for housing for 5 or more dwellings:					
Location Proposals Map ID	Site Name	Hectares	Indicative Affordable Housing Requirement	Estimate Market & Affordable (Allocation) or Permission	Estimate Affordable Housing Figure (Allocation) or Permission	Anticipated Delivery by 2031 ¹¹ (Affordable element in brackets)
	Former Sir Benfro Inn	0.08				3(0)
Jameston						
HA6	Opposite Bush Terrace	1.69	29%	38	11	38(11)
HC6	Green Grove	0.56	33%	9	3	9(3)
Lydstep						
HA7	West of the Green	0.4	50%	10	5	10(5)
Manorbier Station						
HC7 ¹⁷	Field Opposite Manorbier VC School	0.63	91%	23	21	23(21)
New Hedges						

¹⁷ NP/17/283 Reflects resolution to grant planning permission subject to a S106 agreement.

Policy 47	Housing Allocations or Land with Planning Permission The following sites are allocated for housing or have planning permission for housing for 5 or more dwellings:					
Location Proposals Map ID	Site Name	Hectares	Indicative Affordable Housing Requirement	Estimate Market & Affordable (Allocation) or Permission	Estimate Affordable Housing Figure (Allocation) or Permission	Anticipated Delivery by 2031 ¹¹ (Affordable element in brackets)
HC8	Rear of Cross Park (partly completed April 2019)	1.03	0%	24	0	24
Square & Compass						
HA8	Glasfryn Field	0.26	30%	7	2	4(1)
HA9	Land adj to Bryngolau	0.33	30%	10	3	4(1)
St Ishmaels						
HC9 ¹⁸	Adj to the School	0.74	25%	13	3	13(3)
Trefin						
HA10	Land off Cefn	0.35	25%	10	3	7(2)

¹⁸ Figures reflect planning permission NP/16/0219

Policy 47	Housing Allocations or Land with Planning Permission The following sites are allocated for housing or have planning permission for housing for 5 or more dwellings:					
Location Proposals Map ID	Site Name	Hectares	Indicative Affordable Housing Requirement	Estimate Market & Affordable (Allocation) or Permission	Estimate Affordable Housing Figure (Allocation) or Permission	Anticipated Delivery by 2031 ¹¹ (Affordable element in brackets)
	Gallod Trefin					
Countryside						
HC10	Land at Whitchurch (almost complete April 2019)	0.06	0%	1	0	1(0)

Appendix 3 Calculating an off-site commuted sum requirement in lieu of on-site delivery

Example:

Calculating an off-site commuted sum payment, for an affordable, two person, one bedroom flat.

The off-site affordable housing commuted sum payment, in lieu of units being provided on site will be calculated as follows:

58% ACG + benchmark land value per plot = off site payment

ACG Values

The latest ACG values should be used. For this example, the latest ACGs are from 2023. The ACG value (2023) for a 2 person, 1 bedroom flat (for schemes 20 homes and under) is £173,420.00. The developer would receive 42% of ACG from an RSL or Pembrokeshire County Council (£72,836.40) and the developer would fund 58% of ACG at a cost of £100,583.60.

Benchmark Land Values

Since 2021, ACG values no longer include land costs. A contribution towards the land cost will also be required. Benchmark land values were contained in The Pembrokeshire Coast National Park Authority's Affordable Housing Study (May 2017)¹⁹ undertaken by Dr Andrew Golland to inform LDP 2 policy. At the LDP 2 examination, the results of the Affordable Housing Viability Study were adjusted by the Housing Background Paper (Table 8)²⁰ as the viability information was required to take account of the cost of sprinklers. The benchmark land values are shown in the table below. Column 2 shows the benchmark land value per hectare and column 3 shows the benchmark land value per plot, based on a density of 30 dwellings per hectare.

¹⁹ [PCNPA AHVS Updated Report June 2019 \(pembrokeshirecoast.wales\)](#)

²⁰ [Housing-Backgroud-Paper-Appendix-4-New-November-2018.pdf \(pembrokeshirecoast.wales\)](#)

Table 3.1 showing benchmark land values per housing market area

Sub Market Area	Benchmark Land Value per Hectare	Benchmark Land Value per plot (based on a density of 30dph)
Newport	£552,273.00	£18,409.10
Tenby	£533,523.00	£17,784.10
South East Coast	£378,409.00	£12,613.63
St Davids and North Coast	£323,864.00	£10,796.47
South West Coast	£300,000.00	£10,000.00
St Bride's Bay	£291,477.00	£9,715.90
Estuary Hinterland	£286,364.00	£9,545.47
North East	£323,864.00	£10,795.47

For this example, providing an off-site contribution in lieu of an affordable, two person, one bedroom flat being provided in St Davids would be calculated as follows:

Example: Calculation of off site commuted sum payment required in lieu of a two person one bedroom flat in St Davids.

£100,583.60 (58% 2023 ACG for a two person one bedroom flat)

+ £10,796.47 (benchmark land value per plot in St Davids and North Coast sub market area)

= £111,380.07 (commuted sum payment required)

Appendix 4 Contacts

For Pre Application Advice on development proposals and obligations required

Pembrokeshire Coast National Park Authority
Development Management
Llanion Park
Pembroke Dock
Pembrokeshire
SA72 6DY
Telephone: 01646 624800
Email: DC@pembrokeshirecoast.org.uk

For S106 monitoring information

Planning Obligations Monitoring Officer
Pembrokeshire County Council
Planning
1A County Hall
Haverfordwest
Pembrokeshire
SA61 1TP
Telephone: 01437 764551
Email: planningobligationsmonitoring@pembrokeshire.gov.uk

For legal advice on S.106 Agreements

Legal Executive
Pembrokeshire County Council
County Hall
Haverfordwest
Pembrokeshire
SA61 1TP
Telephone: 01437 764551

Registered Social Landlords operating in Pembrokeshire

To discuss selling affordable housing units or land on to the RSL and for information of Design Quality Requirements, Rental Levels and Acceptable Cost Guidance.

Ateb Group

Barcud

Bro Myrddin Housing Association

Pobl

Pembrokeshire County Council

Wales & West Housing

Planed can provide information and advice on working with Community Land Trusts

Parc Cenedlaethol Arfordir Penfro

Pembrokeshire Coast National Park



Report of Consultation – January 2026

Local Development Plan 2 Supplementary Planning Guidance:

- Conversions in the Countryside
- Replacement Dwellings in the Countryside
- Conservation and Enhancement of Dark Skies Good Practice Guidance
- Affordable Housing

(Consultation period 10 October to 5 December 2025)

Report of Consultation: Local Development Plan 2, Draft Supplementary Planning Guidance documents

Background

The Local Development Plan 2 (LDP 2) for the Pembrokeshire Coast National Park was adopted on 30 September 2020. Alongside Future Wales: The National Plan 2040, the adopted LDP 2 forms the development plan. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning decisions to be made in accordance with the development plan, unless material considerations indicate otherwise.

Supplementary Planning Guidance (SPG) can be prepared to supplement policies in the adopted LDP. SPG does not form part of the LDP, however, once adopted, SPG may form a material planning consideration in the determination of planning applications. SPG is required to be consistent with the adopted LDP and helps to provide consistency and clarity in planning decisions.

SPG has been prepared on the following four topics:

Conversions in the Countryside

The guidance supplements LDP 2, Policy 7 'Countryside' which allows for the conversion of appropriate buildings (criterion c). The SPG is structured around a series of questions and provides guidance on the suitability of buildings for conversion, appropriate uses and guidance on specific design aspects to ensure traditional character and features are retained.

Replacement dwellings in the countryside

LDP 2 does not contain a bespoke policy on replacement dwellings in the countryside, however, the strategic principles, particularly in Policy 29 Sustainable Design and Policy 31 Minimising Waste apply. The SPG provides criteria to assess contribution to landscape character, lawful residential use, the sustainability of demolition, and the appropriateness of any replacement dwelling in size, scale, and siting.

Conservation and Enhancement of Dark Skies

The Welsh Government's Good Practice Guidance on Conservation and Enhancement of Dark Skies provides practical advice on lighting design and assessments. The SPG supplements LDP2 Policies 8 Special Qualities, 9 Light Pollution, 14 Conservation and enhancement of the National Park, 29 Sustainable Design, and 30 Amenity.

Affordable Housing

The Authority has an adopted SPG on Affordable Housing, providing guidance on the implementation of LDP 2 Policies 47 (Housing Allocations or Land with Planning

Permission), 48 (Affordable Housing – Strategy Policy), 49 (Affordable Housing Exception Sites), and 55 (Infrastructure Requirements). The SPG has been updated to provide additional clarity on Pembrokeshire's latest Local Housing Market Assessment (2023), commuted sums, off-site affordable housing contributions, exception sites, and viability assessments.

Consultation Process

Public consultation on the draft Supplementary Planning Guidance documents was conducted over an eight-week period from 10 October to 5 December 2025. An email or letter was circulated to contacts on the Local Development Plan Contact List which includes statutory consultees, targeted groups and members of the public. Members of the National Park Authority, local Councillors and Town, City and Community Councils were also notified.

Officers also raised awareness of the consultation at the Pembrokeshire Planning Agents forum held on 28 November. An online engagement session was held on Monday 10 November for any interested persons or organisations to attend. Four people attended online where officers gave presentations on the SPG documents and there was an opportunity for discussion and question and answers. A meeting was held with officers from the Design Commission for Wales on 21 January to discuss their consultation response.

The draft SPG documents were available to download from the Authority's website and could be viewed online at local libraries.

Questionnaire

To support the consultation process, a structured questionnaire was developed to gather feedback from stakeholders and the public. The questions included were as follows:

Do you wish to comment on the Conversions in the Countryside SPG?

Question 1: Is the question and answer format used in the SPG helpful and easy to understand? Yes / No / Not sure

If you have any additional comments please add below:

Question 2: Is the guidance clear and sufficiently detailed that the building must be capable of conversion without significant rebuilding or alteration and will require a structural report? Yes / No / Not sure

If you have any additional comments please add below:

Question 3: Are the design guidelines (i.e. on openings, roofs, walls etc) appropriate and sufficiently detailed? Yes / No / Not sure

If you have any additional comments please add below:

Question 4: Does the guidance adequately address general considerations in Section B for converted buildings? Yes / No / Not sure

If you have any additional comments please add below:

Question 5: Are there any other comments you would like to make in relation to this draft document?

Question 6: What, in your opinion, would be the likely effects (whether positive or adverse) of the document on the Welsh language? We are particularly interested in whether there are any effects on opportunities to use the Welsh language and on treating the Welsh language less favourably than English.

Question 7: In your opinion, could the document be changed so as to:

- have positive effects, or more positive effects on using the Welsh language and not treating the Welsh language less favourably than the English, or
- mitigate any negative effects on using the Welsh language and on treating the Welsh language less favourably than English? Yes / No / Not sure

Replacement Dwellings in the Countryside

Question 10: Is the question and answer format used in the SPG helpful and easy to understand? Yes / No / Not sure

If you have any additional comments please add below:

Question 11: Does question 1 clearly articulate when a building is likely to be worthy of retention? Yes / No / Not sure

If you have any additional comments please add below:

Question 12: Does question 2 clearly articulate how an existing dwelling is assessed as having a lawful residential use? Yes / No / Not sure

If you have any additional comments please add below:

Question 13: Do you agree that the environmental impacts of the demolition should be considered (question 3)? Yes / No / Not sure

If you have any additional comments please add below:

Question 14: Is the guidance clear that a Structural Report will be required to demonstrate that demolition and re-building outweighs the benefits of reuse through refurbishment? Yes / No / Not sure

If you have any additional comments please add below:

Question 15: Is the guidance on footprint, scale and massing of replacement dwellings clear and appropriate (questions 4 and 5)? Yes / No / Not sure

If you have any additional comments please add below:

Question 16: Are there any other comments you would like to make in relation to this draft document?

Question 17: What, in your opinion, would be the likely effects (whether positive or adverse) of the document on the Welsh language? We are particularly interested in whether there are any effects on opportunities to use the Welsh language and on treating the Welsh language less favourably than English.

Question 18: In your opinion, could the document be changed so as to:

- have positive effects, or more positive effects on using the Welsh language and not treating the Welsh language less favourably than the English, or
- mitigate any negative effects on using the Welsh language and on treating the Welsh language less favourably than English? Yes / No / Not sure

Conservation and Enhancement of Dark Skies

Question 19: Is the guidance clear and easy to understand? Yes / No / Not sure

If you have any additional comments please add below:

Question 20: Does the guidance sufficiently balance the needs for lighting (safety, security, amenity) with the need to conserve dark skies? Yes / No / Not sure

If you have any additional comments please add below:

Question 21: Are there any other comments you would like to make in relation to this draft document?

Question 22: What, in your opinion, would be the likely effects (whether positive or adverse) of the document on the Welsh language? We are particularly interested in whether there are any effects on opportunities to use the Welsh language and on treating the Welsh language less favourably than English.

Question 23: In your opinion, could the document be changed so as to:

- have positive effects, or more positive effects on using the Welsh language and not treating the Welsh language less favourably than the English, or
- mitigate any negative effects on using the Welsh language and on treating the Welsh language less favourably than English? Yes / No / Not sure

Affordable housing

Question 24: Do you agree with the Authority's position that affordable housing in the National Park should not be allowed to be staircase to 100% ownership, so that it remains as affordable housing? This approach is considered necessary due to the

high demand for affordable housing and the limited opportunities for development with the sensitive National Park landscape (see paragraph 2.12). Yes / No / Not sure

If you have any additional comments please add below:

Question 25: Does the guidance clearly communicate that the requirement for affordable housing applies to all residential applications, with a commuted sum payment required below thresholds for onsite delivery of affordable housing? (paragraph 5.1) Yes / No / Not sure

If you have any additional comments please add below:

Question 26: Should proposals for short term holiday lets which are not considered appropriate for full time residential use be excluded from making a commuted sum payment? Yes / No / Not sure

If you have any additional comments please add below:

Question 27: The mix of affordable housing units to be provided, in terms of tenure, size and type must be delivered in line with the need identified in the latest Local Housing Market Assessment for Pembrokeshire. Does this present any challenges for developers? (paragraph 6.1 to 6.3, 6.21 and section 4) Yes / No / Not sure

If you have any additional comments please add below:

Question 28: Is it clear what evidence will be required from an applicant to support the delivery of affordable housing offsite? (paragraphs 6.8 to 6.14). Yes / No / Not sure

If you have any additional comments please add below:

Question 29: Do you agree with the proposed approach to calculating a financial contribution when a development cannot provide a required on-site provision? (paragraphs 6.8 to 6.14 and Appendix 2). Yes / No / Not sure

If you have any additional comments please add below:

Question 30: Is the guidance clear that social rented tenure and intermediate rented tenures will be the only acceptable forms of affordable housing on exception sites and the Authority will not support any form of ownership? (paragraphs 6.16 – 6.19)

Yes / No / Not sure

If you have any additional comments please add below:

Question 31: Are the requirements for challenging economic viability clear? (Section 7 and Appendix 1) Yes / No / Not sure

If you have any additional comments please add below:

Question 32: Are there any other comments you would like to make in relation to this draft document?

Question 33: What, in your opinion, would be the likely effects (whether positive or adverse) of the document on the Welsh language? We are particularly interested in

whether there are any effects on opportunities to use the Welsh language and on treating the Welsh language less favourably than English.

Question 34: In your opinion, could the document be changed so as to:

- have positive effects, or more positive effects on using the Welsh language and not treating the Welsh language less favourably than the English, or
- mitigate any negative effects on using the Welsh language and on treating the Welsh language less favourably than English? Yes / No / Not sure

Consultation Responses

Five responses were received via the online questionnaire and 14 responses were received by email, of which 3 responded with no specific comments. The responses are summarised below with an officer response.

Conversions in the Countryside SPG

Out of the five questionnaire responses received, two included comments relating to the Conversions in the Countryside SPG. In addition, six out of the 14 emails received raised comments on the Conversions SPG. Many of the comments were overlapping for the conversion and replacement dwellings SPGs, so the emails for both are summarised together below.

Questionnaire responses

In relation to questions 1 to 4 the two respondents answered 'yes' which was supportive of the SPG and provided no further comments or suggested changes.

Question 5: *Are there any other comments you would like to make in relation to this draft document?*

A response was received which highlighted the need for more supported living provision for elderly and retiring farmers.

Officer response:

The Authority acknowledges this point, and it is noted that under the first key question of the Conversions in the Countryside SPG, a primary objective of the guidance is to prioritize the reuse of buildings for purposes that contribute to sustaining local communities. This includes supporting the housing needs of retiring farmers. However, it is important to clarify that these SPGs are primarily technical design and use guides and not policy documents.

The specific needs of the farming community are addressed via national policy. Section 4.5 of Technical Advice Note (TAN) 6 'Planning for Sustainable Rural Communities' provides a policy exception that specifically supports the transition of farm management, and the housing needs of retiring farmers. As this mechanism is already utilized by the Authority in planning decisions, no further amendments to these SPGs are required.

Question 5: *Are there any other comments you would like to make in relation to this draft document?*

One respondent commented that the draft guidance focuses disproportionately on traditional stone and slate structures, overlooking the economic potential of modern rural buildings. They contend that these structures are established features of the landscape and represent a vital resource for local employment and economic diversification. In addition, the SPG should adopt a more inclusive approach that recognizes the value of the actual available built stock in sustaining the National Park's economy and community.

Officer response:

Traditional buildings are prioritized because their survival ensures the retention of the character and special qualities that defines the Park's rural landscape whereas the Authority maintains that many modern buildings such as those constructed of

concrete blocks, asbestos sheeting, or clear-span designs are often visually intrusive. LDP paragraph 4.46 states that “it is possible in exceptional circumstances that a modern utilitarian building may make a positive and important contribution to rural employment opportunities without detracting from the appearance of the landscape. Residential or serviced accommodation or holiday accommodation uses would be precluded in proposals for such buildings”. Paragraph 2 of the Notes section under the question “*What use is the building going to be converted to?*” on page 11 has been amended to provide this further clarification.

Replacement Dwellings in the Countryside SPG

One questionnaire response was received relating to the Replacement Dwellings SPG. In addition, six emails made comments on the Replacement Dwellings SPG. Many of the comments were overlapping for the replacement dwellings and conversion SPGs, so the emails for both are summarised together below.

Questionnaire responses

In relation to questions 10 to 15 the respondent answered ‘yes’, which was supportive of the SPG and provided no further comments or suggested changes.

Question 16: *Are there any other comments you would like to make in relation to this draft document?*

A response was received which highlighted the need for more supported living provision for elderly and retiring farmers.

Officer response:

This question has been addressed under the response to question 5 above.

Emails received relating to Conversion and Replacement Dwellings SPGs

Six of the 14 emails received included comments related to the Conversion and Replacement Dwellings SPGs. Many of the comments were overlapping for the two SPGs, so the emails for both are summarised together below.

Design Commission for Wales (DCFW)

The Design Commission for Wales primarily raised suggestions in relation to both the Conversions and Replacement Dwellings in the countryside SPGs. Their main points are summarised below:

- The DCFW noted in their response that the National Park must remain a living place and cautions that controls should not be so strict that they prevent evolution of design in the Park.

- While the draft SPG for Replacement Dwellings focuses on maintaining the same footprint, scale, and size (Questions 4 and 5), the DCFW suggests that high-quality design may mean a replacement dwelling does not necessarily need to be limited to these existing parameters.
- The DCFW encourage the SPGs to support innovative and contemporary design and the use of materials that address climate and nature emergencies, rather than focusing solely on traditional design.
- They suggest that instead of just hiding or mitigating development, the guidance should recognize that high-quality interventions can positively contribute to the landscape and experience of a place.
- It was noted that greater detail could be given to the functional requirements of contemporary design, enabling replacement dwellings to respond effectively to current building regulations and modern living standards.
- They also note that the guidance should promote a robust design process, explained through a Design and Access Statement, that explores how a dwelling can best be integrated into its specific site and context.

Officer response:

The Authority acknowledges that the National Park's character is the result of years of evolution. However, this evolution must be balanced against the statutory requirement to protect special and unique characteristics and locally distinctive characteristics. Therefore, both documents have been reviewed to ensure they not inadvertently freeze design growth and explicitly state that contemporary design is welcome, provided they are context-sensitive. Similarly, the language in both documents has been reframed in part from a defensive tone, such as avoiding harm, to a proactive one, where we will seek enhancement where possible. Q2 now makes reference to the functional contribution modest extensions and alterations to existing buildings can make, where in some instances they can enhance the usability and quality of key living spaces.

In respect of the points raised on scale and size (Questions 4 & 5 – Replacement Dwellings SPG) the Authority has amended the wording in the “Practical Guidance” sections below each question to provide further clarity on where flexibility will be acceptable. It is stipulated however that such flexibility will only be granted where an applicant can prove, through a robust design process, that the alternative proposal offers a superior landscape outcome compared to a like-for-like replacement.

Reference in Q2 has also been made to the Authority's relevant Supplementary Planning Guidance on Seascape and Landscape Character Areas and Sustainable Design, which sets out best practice for achieving high-quality design that responds positively to, and enhances, the landscape character and cultural heritage of the National Park.

Section C “*Further information and contacts*” has also been updated to emphasize the importance of the design process, with reference to the DCFW Design Review service while also linking their Site and Context Analysis Guide and Design and Access Statement Guidance.

GJP Planning & Development consultancy

GJP Planning & Development consultancy has raised concerns in relation to both the Conversions and Replacement Dwellings in the countryside SPGs. Their main points are summarised below:

- The SPG fails to explicitly state that one-for-one replacements are an established, acceptable exception to countryside development restrictions.
- The draft SPG contradicts Planning Policy Wales (PPW 3.15-3.16) by being too prescriptive. It risks forcing "pastiche" designs rather than allowing for modern, innovative, or award-winning architecture.
- The tone is viewed as "inhibiting" rather than "facilitating," ignoring the sustainability benefits of renewing old housing stock.
- The planning agency disputes the claim of a "housing resurgence," citing post-pandemic retraction and the suppressive impact of high council tax multipliers on property values.
- For Replacement Dwellings in the Countryside, Question 2 (Lawful Use) should be the primary test. Question 1 (Character) should be secondary.
- The phrase "worthy of retention" is too subjective. It is recommended objective thresholds like "contributes significantly" or "of importance to the character of the area."
- Question 3 (Justification) is worded with a "case against" demolition rather than remaining neutral on carbon and energy performance.
- The 30% floor area cap is too restrictive and should be removed. It prevents small dwellings from being upgraded to modern living standards.
- The term "grandiose" is criticized as unprofessional and biased.
- Use flexible terms like "not materially larger" or "proportionate increase" to allow for case-by-case assessment.

Officer response:

The Authority maintains that replacement dwellings are an established form of development that may be acceptable in countryside locations. However, it is reiterated that PPW12 requires development in the open countryside to be strictly controlled, and replacement dwellings do not benefit from an automatic presumption of approval and the onus remains on the applicant to justify the loss of an existing structure. The introductory sections of the SPG have been amended to clearly acknowledge this "in principle" acceptability, subject to appropriate justification.

The Authority agrees that reference to PPW12 Paragraphs 3.15–3.16 would be helpful to clarify that innovative and contemporary solutions are supported where they are demonstrably responsive to site context. Reference to these sub paragraphs in PPW12 have been included in Section B under the 'Design' heading.

Regarding the order of Questions 1 & 2, this was also picked up by Officers after the SPGs went out for consultation and has been amended as suggested.

References to the “resurgence” of the housing market has been reviewed and updated to ensure the document reflects the current economic context. Additionally, the wording regarding a building’s “worthiness for retention” has been refined to be more objective.

On the point raised on demolition, the emphasis on retention reflects national policy regarding embodied carbon and construction waste. While the requirement to justify demolition remains, the Authority accepts the tone should remain evidential. Adjustments have been made to ensure the text does not appear to predetermine outcomes.

Finally, the 30% increase in floor area is intended as guidance to assist applicants, not a fixed cap. The Authority will provide further clarification to reinforce that proposals are assessed on a case-by-case basis, with primary emphasis placed on landscape impact and proportionality rather than numerical increase alone.

Public Respondent

One respondent had written to the Authority raising concerns in relation to both the Conversions and Replacement Dwellings in the countryside SPGs. Their main points are summarised below:

- It is noted that there is a discrepancy between paragraph A.16 (which mentions “above horizontal”) and B.25, pointing out that standard harmful light spill is typically defined as above 70 degrees per Welsh Government guidance.
- Paragraph B.25 is flagged as confusingly written and requires a redrafting.
- Regarding light spill from windows (B.28), it is suggested moving from “encouraging” mitigation measures (like blinds) to “requiring” them.
- The respondent identifies that the photograph used to illustrate “coated aluminium” actually shows “cast iron-effect plastic”.
- They recommend replacing the current phrasing with a direct instruction to avoid timber fascias and to use drive-in brackets for gutters.
- At section B.30 They propose amendments to wording surrounding landform and its relation to buildings.

Officer response:

The Authority has amended A.16 to align with the 70-degree light spill threshold cited in Dark Skies SPG guidance. However, the Authority maintains that section B.25 is sufficiently clear and requires no further redrafting.

While the Authority supports minimizing light spill from windows, an SPG cannot introduce new mandatory requirements beyond the Local Development Plan. The wording will remain as encouragement rather than a requirement.

At page 18, the caption will be updated to: *“Photograph showing black cast iron-effect plastic to match the windows, attached with rise-and-fall brackets spiked directly to the wall.”*

The Authority considers the existing wording of B.30 appropriate, as it balances respecting the landform with other essential site requirements.

Babb Architects

Babb Architects had raised concerns in relation to both the Conversions and Replacement Dwellings in the countryside SPGs. Their main points are summarised below:

- The planning agent suggests that owls should be referenced alongside other protected species, noting their protection under the Conservation of Habitats and Species Regulations 2017 (formerly 1994).
- The Authority is advised to cross-reference the SPG with recent Welsh Government consultations on energy efficiency to ensure the document aligns with upcoming statutory changes to Building Regulations.
- It is suggested that while keeping panels off "principal elevations" is a design goal, technical factors like overshadowing, tree cover, and orientation (aspect) often make specific locations non-viable. It was also highlighted a potential conflict with proposed building regulations requiring PVs on new extensions over 30m², noting that these regulations currently do not exclude installations that may be functionally ineffective due to site constraints.

Officer response:

Paragraph B.12 has been amended to explicitly include owls.

The advice on the ongoing Building Regulations consultation is appreciated. The SPG has been reviewed to ensure terminology and requirements remain consistent with the latest updates.

The Authority acknowledges that technical constraints like orientation and overshadowing affect PV viability. However, Part L of the Building Regulations provides exemptions for significant extensions within Conservation Areas or for Listed Buildings where compliance would unacceptably alter character. In such cases, the Authority will work with applicants to find a balance between energy performance and landscape protection.

Hayston Developments & Planning Ltd

Hayston Developments & Planning Ltd planning consultancy has not formally commented on the draft supplementary planning guidance documents but has directed the Authority to recently submitted case with attached precedents and appeal caselaw

Officer response:

The Authority thanks Hayston Developments for drawing attention to a recently submitted planning case and associated appeal decisions. We have considered the

material referenced and note that they reinforce the established national and local planning policy approach to development in the countryside. The Authority considers that no major amendments to the draft Supplementary Planning Guidance are required.

Community Campaigner

One respondent had written to the Authority providing a universal representation intended for use in UK-wide planning consultations. Their response primarily focuses on the promotion and preservation of traditional vernacular architecture as the solution for economic, environmental, and social issues in UK planning.

Officer response:

As the response received from this respondent is an umbrella response to a wide variety of ongoing consultations throughout the UK and makes no direct comment on the specifics of the supplementary guidance, it is considered no amendments are required. However, the Authority does acknowledge points raised in the response relating to the significance of identifying and protecting both designated and non-designated heritage assets and the role of traditional building materials in ensuring long-term building longevity.

Other changes made:

Strategic Policy Officers have worked with Development Management Officers to ensure the SPG documents provide sufficient clarity. Minor changes have been made to the notes sections under the questions and in section general B considerations. The changes made will be useful to both applicants and DM officers.

Conservation and Enhancement of Dark Skies Good Practice Guidance

Questionnaire responses

No responses were received to the online questionnaire.

Emails received

Public Respondent

One respondent had written to the Authority providing comments in relation to the Planning for the Conservation and Enhancement of Dark Skies in Wales SPG. The main points are summarised below:

- The Authority has very limited, if any, control over County Council street lighting provision.
- The County Council changes from sodium vapour lighting to LED lighting (generally assessed to have twice the environmental impact of the original sodium vapour provision) implemented without consultation with the Authority.
- The Council only required to audit their street lighting in limited circumstances.
- The Authority and the County Council might undertake an audit of all Council street lighting within the Protected Landscape (sic) to assess if a particular provision had any real public utility, If not, it could be turned off or removed. Where it is retained, it should be screened.
- Strong evidence of a significant decline in the insect population and street lighting may be a significant contributor. If in due course, this proves to be the case, this form of street lighting will need to be completely discontinued.
- The Council has started turning off single lamps in open landscapes, maybe for cost savings and no public benefit.

Officer response:

The Authority acknowledges and welcomes the points raised about the need for an audit of street lighting within the National Park. The comments raise issues beyond the scope of the SPG and it is considered that no amendments are necessary.

Affordable Housing Draft SPG

Out of the five questionnaire responses received, three included comments relating to the Affordable Housing SPG. In addition, six out of the 14 emails received raised comments on the Affordable Housing SPG.

Questionnaire responses

Question 24: *Do you agree with the Authority's position that affordable housing in the National Park should not be allowed to staircase to 100% ownership, so that it remains as affordable housing?*

One respondent agreed that affordable housing should be retained and not permitted to staircase to 100% ownership. Two respondents disagreed, commenting that rental only tenures is too restrictive. Respondents highlighted that Section 106 agreements can support a range of ownership tenures and that greater flexibility is needed to deliver mixed, sustainable communities. It was also raised that opportunities for self-build units should be available and actively promoted.

Officer response:

There appears to be a misunderstanding from respondents that the Authority does not support any form of affordable ownership tenures. The SPG supports a range of affordable housing tenures, including social rented housing and intermediate tenures such as intermediate rent, low cost home ownership (LCHO), and shared ownership on sites within settlement boundaries, in line with evidence of need from the latest Local Housing Market Assessment (LHMA).

Guidance on staircasing to 100% ownership on sites within settlement boundaries has been provided to highlight the practical challenges and to ensure the long-term retention of affordable housing. To address respondents' comments, the SPG has been revised to clarify that each proposal will be considered on its individual merits, and proposals to staircase and recycle capital funding may be acceptable. The Authority would require the identification of the recycling of capital receipts within the same settlement, or where there is evidence of affordable housing need within the wider community council area or an adjoining community council within the National Park this may be acceptable in some circumstances. The replacement dwelling should be of a comparable build standard, preferably to Welsh Development Quality Requirements (WDQR) (see paragraph 2.12 and 2.13).

The SPG also supports self-build affordable units. While delivery can be more challenging due to skills and resources, self-build plots are available to those demonstrably in housing need, without requiring registration on the Common Housing Register. Self-build properties must remain affordable in perpetuity, typically at 70% of open market value. Opportunities exist for self-build on infill plots and through community-led schemes, including involvement by Community Land Trusts. The SPG has been amended to state that self-build properties on exception sites will require appropriate mechanisms to ensure that affordable housing restrictions are retained in perpetuity.

Question 25: *Does the guidance clearly communicate that the requirement for affordable housing applies to all residential applications, with a commuted sum payment required below thresholds for onsite delivery of affordable housing? (paragraph 5.1)*

All three respondents agreed that the guidance clearly communicated the requirement for affordable housing and commuted sum payments. One respondent would welcome confirmation that 100% of the commuted sum contributions is for the provision of affordable housing within the immediate local community from which the development originates to ensure the principle of local need is fully met.

Officer response: This information is provided in paragraph 8.6 which has been amended for further clarity but communicates that the money is spent on affordable housing and outlines the cascade approach that is applied.

Question 26: *Should proposals for short term holiday lets which are not considered appropriate for full time residential use be excluded from making a commuted sum payment?*

All three respondents agreed that proposals for short term holiday lets which are not considered appropriate for full time residential use be excluded from making a commuted sum payment. It was argued by one respondent this exemption is justified because such conversions often fail to create new housing pressure and could potentially make the development unviable.

Officer response: It is recognised that planning obligations must meet the statutory tests of being necessary, directly related to the development and fairly and reasonably related in scale and kind. Where a proposed holiday let would be unsuitable for permanent habitation and has a limitation via planning condition, it would not generate a requirement for an affordable housing contribution. If the use class is not specified with an application, it will be assumed it could be occupied within Use Class C3 main or sole residence and will require a commuted sum contribution, subject to viability.

Question 27: *The mix of affordable housing units to be provided, in terms of tenure, size and type must be delivered in line with the need identified in the latest Local Housing Market Assessment for Pembrokeshire. Does this present any challenges for developers? (paragraph 6.1 to 6.3, 6.21 and section 4)*

Two respondents answered, 'not sure' and one respondent replied yes. Respondents commented that the LHMA identifies strategic trends, and does not adequately reflect affordable housing need, and cannot capture individual needs and preferences at a household level. The respondents argue that Technical Advice Note 6: Planning for Sustainable Rural Communities requires LPAs to take account of these (para 4.2.4). It was argued that the SPG's exclusion of all ownership tenures would prevent meeting locally identified needs for intermediate or affordable

ownership, especially in small rural communities. There should be opportunities for self-build options on exception sites.

Officer response: There appears to be a misunderstanding that intermediate or affordable ownership is excluded from the National Park which is not the case. The SPG supports the development of different types of affordable housing tenure. As stated in the Officer's response to question 24, there are some issues regarding staircasing to 100% ownership of affordable housing or delivering ownership tenures on exception sites.

The Local Housing Market Assessment is the primary source of evidence for identifying affordable housing need, including tenure and property size requirements. The Pembrokeshire LHMA 2023 has been prepared in accordance with the prescribed methodology set out by the Welsh Government which uses the evidence from the Pembrokeshire Housing Register to inform the calculations of housing need. Pembrokeshire's LHMA 2023 was agreed by the Welsh Government.

An amendment has been made to the SPG with the inclusion of paragraph 4.6 which states that evidence of local housing need may also be submitted by local communities or site promoters. Such evidence may be given weight in decision making where it has been prepared using a robust and transparent methodology and has been subject to appropriate scrutiny. The weight to be afforded to this evidence will be determined on a case by case basis.

With regard to self-build units, see the officer's response under question 24.

Question 28: *Is it clear what evidence will be required from an applicant to support the delivery of affordable housing offsite? (paragraphs 6.8 to 6.14).*

Two respondents answered 'yes', the information is clear and one respondent answered 'not sure'. No additional information was provided from respondents.

Officer response: No amendments necessary.

Question 29: *Do you agree with the proposed approach to calculating a financial contribution when a development cannot provide a required on-site provision? (paragraphs 6.8 to 6.14 and Appendix 2).*

Two respondents answered 'not sure' and one respondent answered 'yes'. One respondent commented that the calculation methodology must be subject to robust scrutiny and it must be realistic and not unintentionally render development unviable. The methodology should account for high build costs and low achievable sales values common in affordable housing development within the National Park.

Officer response: The methodology for calculating an off-site commuted sum requirement in lieu of on-site delivery is provided in the SPG, Appendix 3. This consultation has invited scrutiny on the methodology. The methodology aligns with the established transfer value where developers receive 42% of the Welsh Government's latest Acceptable Cost Guidance (ACG) value for affordable housing

for rent from a Registered Social Landlord, with the developer required to fund the remaining 58% of ACG costs. These percentages were established in the adopted Affordable Housing: Interim Supplementary Planning Guidance (September 2020, paragraph 2.6).

ACG values do not include land costs and the cost of acquiring the land should also be provided. The benchmark land values are taken from the Affordable Housing Study that was undertaken by Dr Golland to inform LDP 2 policy which has been subject to examination. This methodology has been used for a recent application to modify the section 106 agreement, (schedule 2 on affordable housing), reference NP/24/0119/MOD.

As stated in the SPG at paragraph 7.6, an applicant can demonstrate particular exceptional circumstances to justify the need for a viability assessment at the planning application stage and guidance is provided on this process.

Question 30: Is the guidance clear that social rented tenure and intermediate rented tenures will be the only acceptable forms of affordable housing on exception sites and the Authority will not support any form of ownership? (paragraphs 6.16 – 6.19)

Two respondents indicated that the SPG was not clear, while one respondent indicated that the information was clear.

It was commented that the SPG is unclear and inconsistent. Paragraph 6.16 states that ownership models are “unlikely to be supported”, yet the consultation question presents this as a total prohibition. Concern was raised that this was a significant policy shift and overreach. It was argued that the blanket exclusion of ownership-based affordable housing is inconsistent with national policy in TAN 2 and TAN 6 (paragraph 4.2.2) and recent Ministerial clarification to maximise affordable housing supply. The respondent commented that the SPG exceeds the intended remit of supplementary guidance, and risks constraining affordable housing delivery and innovation. It is requested that the SPG be amended to allow case-by-case discretion in line with national policy.

Officer response:

The wording of Question 17 in the questionnaire was more strongly phrased than the SPG to encourage views and opinions on the draft document, and respondents were invited to comment on appropriate wording for the SPG.

With regard to forms of affordable ownership on exception sites, the wording has been amended to ensure it does not prevent forms of ownership on exception sites. National policy does not prevent affordable ownership on exception sites but requires mechanisms to ensure they are retained in perpetuity. Respondents have referenced Technical Advice Note 6: Planning for Sustainable Rural Communities which reads: “planning authorities must ensure that properties constructed are affordable to the local community as a whole, not only the initial occupier, and requests to allow disposal on the open market (except where the mortgagee is in possession) resisted.” (paragraph 4.2.4). The reference in TAN 6 is in relation to

affordable housing and not specifically on exception sites where development must be more strictly controlled, as exception sites are unsuitable for market housing. The SPG has been amended to state that on affordable housing exception sites, Low Cost Home Ownership (LCHO) and shared ownership may be supported where appropriate measures are in place to ensure restrictions are retained in perpetuity. This approach reflects national policy, including PPW (paragraph 4.2.35) and TAN 2 (paragraph 10.14), and avoids the use of Mortgagee in Possession clauses that could allow affordable housing to be lost from the local stock. A cascade mechanism in planning obligations must ensure occupancy by eligible households is maintained and not released as market housing. Proposals that include a Mortgagee in Possession clause which could enable the loss of these restrictions are therefore unlikely to be supported.

Question 31: Are the requirements for challenging economic viability clear? (Section 7 and Appendix 1)

Two respondents answered “yes,” while one was unsure. One respondent requested clarity on the independence of the viability assessment process and suggested confirmation that assessments would be carried out by an independent assessor, with flexibility applied where genuine viability challenges arise, particularly for smaller, infill, or exception sites.

Officer response: Paragraphs 7.5 and 7.9 refer to the use of an independent viability assessor. The Authority may adopt a flexible approach where robust and detailed information is submitted using an open book methodology, clearly demonstrating the scheme’s economics, as set out in paragraphs 7.7 and 7.10.

Question 32: Are there any other comments you would like to make in relation to this draft document?

One respondent provided additional comments that the draft SPG appears inconsistent with the national mandate to “maximise the supply of affordable housing” (TAN 6, para 4.2.2). It reduces the available delivery methods, discourages innovation, and does not comply with Ministerial guidance regarding TAN 2 paragraph 10.14, which requires a case-by-case assessment. If adopted, this SPG risks inhibiting the delivery of affordable homes by eliminating viable, self-funded ownership models.

Concern was raised that there was a presumption against self-build on exception sites is considered to be unfair and impedes requirements (TAN6 para 4.2.4) to ensure a flexible approach to delivery. It was noted that exception sites are already assessed against development management criteria and considered acceptable in terms of character and sustainability, and that the risks associated with mortgagee-in-possession clauses were considered minimal. Comparisons were drawn with the approach taken by other planning authorities, where self-build exception sites are permitted, and with Rural Enterprise Dwellings approved under TAN 6, where similar mortgage concerns do not arise. The respondent also questioned the assumption in the draft SPG that mortgage arrangements cannot accommodate alternative

mechanisms to secure long-term affordability, noting that lenders may be willing to adopt more flexible approaches and a common approach is for an open resale to take place in the event of a default but for any subsequent sales to revert to the original occupation clause thereby ensuring that the dwelling is secured as affordable in the long-term.

Officer response: As stated in response to earlier questions all affordable housing tenures are acceptable in the National Park.

The planning system in Wales is plan-led and planning law requires that applications be determined in accordance with the development plan, unless material considerations indicate otherwise. This establishes a fundamentally different approach to development proposals within settlement boundaries compared to proposals outside settlement boundaries, where land is classed as countryside. Exception sites not acceptable for market housing and the Authority seeks to retain affordable housing in perpetuity.

With regard to neighbouring authorities, Pembrokeshire County Council is the Housing Authority and their Affordable Housing SPG specifies that social or intermediate rented properties will only be permitted on exception sites due to the mortgagee in possession clause enabling the re-sale of the property without any affordable restriction (see PCC's Affordable Housing SPG, paragraph 2.17). As stated in the officer's response under question 24 and 30, the wording of the SPG has been amended.

With regard to mortgagee-in-possession clauses, it is general practice that, when mortgage payments default, a mortgagee may take possession of a property, however, planning conditions and Section 106 obligations continue to apply. In the case of affordable housing, mortgage lenders may require an additional clause allowing the affordable housing restrictions to be lifted, typically after a specified period set out in the legal agreement. This is fundamentally different to Rural Enterprise Dwellings which are secured via planning condition, as opposed to a legal obligation.

Question 33: *What, in your opinion, would be the likely effects (whether positive or adverse) of the document on the Welsh language? We are particularly interested in whether there are any effects on opportunities to use the Welsh language and on treating the Welsh language less favourably than English.*

One respondent answered this question and commented that in small rural communities in the national park, market housing and open market building plots can be extremely unaffordable. By introducing a blanket prohibition on all forms of affordable ownership tenures, many local people will need to leave the community to own their home and this will inevitably have a negative effect on the Welsh language in rural communities.

Officer response: As set out in responses to Questions 24, 27 and 30, the SPG supports a range of affordable housing tenures, including LCHO and shared

ownership, particularly within settlement limits where a mix of tenures may be appropriate. The SPG provides guidance on the practical limitations of staircasing to full ownership.

In relation to exception sites, the SPG has been revised to state that robust mechanisms must in place to ensure affordable housing can be retained in perpetuity.

The SPG is consistent with national policy and seeks to ensure affordable housing is provided to meet local needs, including the needs of Welsh speakers and ensure that suitable mechanisms are in place for the retention of affordable housing or its replacement for future generations.

Question 34: *In your opinion, could the document be changed so as to:*

- *have positive effects, or more positive effects on using the Welsh language and not treating the Welsh language less favourably than the English, or*
- *mitigate any negative effects on using the Welsh language and on treating the Welsh language less favourably than English?*

No responses were received in relation to this question.

Emails received

14 emails were received in response to the consultation, of which six raised comments on the Affordable Housing SPG as outlined below.

Jane Dodds MS

Jane Dodds MS had written on behalf of a constituent who raised the following concerns:

1. Consideration of national policy and ministerial guidance and potential differences between the draft SPG with Planning Policy Wales and Technical Advice Notes 2 and 6.
2. Clarity on approach to ownership based affordable housing on rural exception sites
3. Clarity on alignment with Local Housing Market Assessment tenure mix
4. Proportionality of viability assessment requirements
5. Relationship between the SPG and consistency with LDP policy

Officer response: Points 1 and 2 are addressed in the officer's response to Question 24 and 30 above. Clarity regarding the Local Housing Market Assessment tenure mix is provided in the response to Question 27. Proportionality of viability assessment requirements is addressed in the response to Question 31.

With regard to the relationship between the SPG and LDP, planning law requires planning decisions to be made in accordance with the development plan, unless material considerations indicate otherwise. Alongside Future Wales: The National Plan 2040, the adopted LDP 2 forms the development plan. Supplementary

Planning Guidance (SPG) can be prepared to supplement policies in the adopted LDP. SPG does not form part of the LDP, however, once adopted, SPG may form a material consideration in the determination of planning applications. SPG is required to be consistent with the adopted LDP and helps to provide consistency and clarity in planning decisions. The SPG does not amend any of the LDP 2 policies regarding affordable housing and provides additional guidance regarding:

- The delivery requirements of different tenures of affordable housing on exception sites (supplementary to LDP 2 policy 49, criterion b and paragraph 4.291 and policy 52)
- Details on the latest requirements for affordable housing tenure and size from the latest Local Housing Market Assessment to ensure affordable housing is appropriate to address local needs (supplementary to paragraph 4.279 and 4.281)
- Viability challenges and the information required to assess the viability of a scheme to ensure that applications can be determined in a timely manner (supplementary to policy 48).

Ben Lake MP

Ben Lake MP had written on behalf of a constituent raising the following concerns:

- The draft SPG appears to introduce a blanket ban on all forms of affordable home ownership on rural exception sites — allowing only rental tenures. This position has no clear basis in national planning policy (Planning Policy Wales, TAN 2 or TAN 6) and conflicts with approaches taken by neighbouring authorities such as Ceredigion, Carmarthenshire and Powys.
- It was argued that there was limited land within settlement boundaries and is unaffordable for local needs which will push younger residents and key workers out of their home areas.

Officer response: The officer's response to Question 30 responds to the position regarding rural exception sites. Other authorities in Wales, including Pembrokeshire County Council include such information within their Supplementary Planning Guidance (see Officer's response to Question 32). It is important to ensure robust mechanisms are in place to ensure affordable housing can be retained in perpetuity.

The National Park has as statutory purpose to conserve and enhance the natural beauty, wildlife and cultural heritage of the Park which places a limitation on the landscape capacity to accommodate new development. There are limited land opportunities within settlement boundaries, however, LDP Policy 48 Affordable Housing (Strategy Policy) identifies a target and requirements for developers to deliver affordable housing or provide commuted sum payments towards the delivery of affordable housing. It is therefore of upmost importance that affordable housing that is delivered is retained in perpetuity for future generations. The SPG draws on the most recent evidence in the Local Housing Market Assessment (2023), which identifies a predominant need for social rented tenures.

Cwmpas Group

Cwmpas identifies strong alignment between the SPG's objectives and community-led housing and would welcome a separate section in the SPG on community led housing. Their response highlights recent changes to Planning Policy Wales (Edition 12), which supports community-led housing as a form of affordable housing, and stresses that this policy context should be reflected in the SPG.

Cwmpas defines community-led housing as locally driven development that meet long-term housing needs, delivers affordable homes in perpetuity, and generates wider social, economic, and environmental benefits. Such schemes can take many forms, including co-housing, housing co-operatives, or Community Land Trusts. These forms of community-led housing share core principles of meaningful community engagement, long-term ownership, management or stewardship of properties and retain housing in perpetuity. Cwmpas argues that community-led housing directly addresses key challenges such as demographic imbalance, inequality, climate and nature emergencies, and community wellbeing, while strongly aligning with placemaking principles and the Well-being of Future Generations Act.

Cwmpas would welcome a section on community-led housing within the SPG, to identify it as a central part of affordable housing delivery.

Officer response:

New paragraphs 2.15, 2.16 and 2.17 have been added to the SPG to identify community-led housing as a mechanism for delivering affordable housing. The guidance outlines the important role community-led affordable housing can play in meeting local housing needs and how community groups can work in partnership with other providers and developers to bring schemes forward. It also sets out the different models of community-led housing and the key principles that underpin them, including meaningful community involvement, long term ownership or management and mechanisms to ensure that affordable housing is retained in perpetuity.

Pembrokeshire County Council

PCC commented that they understand the Authority's concerns regarding the loss of affordable units given the limited development opportunities and no guarantee that funding will remain in the Nation Park area. They highlight that where Shared or LCHO properties staircase to full ownership and the RSL or LA received an element of grant funding from Welsh Government, this money will stay in Pembrokeshire and will become Recycled Capital Grant (RCG) towards a new scheme.

Questions were raised regarding the operation of CLTs including:

- mechanisms that will be in place for transfer of units if the CLT ceases to exist
- letting arrangements through the Choice Homes Register

- compliance with Welsh Housing Quality Standard and maintenance of properties

Officer response: It has been the Authority's experience to date that management of affordable properties has been undertaken by an RSL or PCC and not a CLT. The S106 agreement would detail a cascade mechanism where properties would be transferred from a CLT if they ceased to exist to an RSL and PCC in the first instance. The Section 106 agreement would also outline the allocation requirement through the Choice Homes register which would likely be undertaken by PCC or an RSL on behalf of the CLT, as the CLT would not have access to this data. The Section 106 legal agreement will ensure all Social Rented properties meet the Welsh Housing Quality Standard (WHQS) prior to occupation. PCNPA will not be responsible for the ongoing maintenance of the affordable housing, however, before the CLT takes on the properties, the Authority will require appropriate assurances through the planning and legal framework.

Heneb

Heneb would welcome a steer toward the existing Historic Environment SPG which includes consideration of Archaeology within the general planning process and to reference archaeology as a potential major consideration when assessing affordable housing developments. Each site is specific, and therefore developers are encouraged to seek archaeological pre-application advice.

Officer response: The SPG is specifically on the topic of affordable housing and it is not considered appropriate to reference archaeology within this SPG.

Design Commission for Wales

The Design Commission for Wales (DCfW) welcome the draft SPG and would welcome a reference to how the DCfW can support the high quality design of affordable housing and promote the use of their Design Review service.

Officer response: Reference to the DCfW service has been added to paragraph 6.4.