

Report of Planning Officer (Park Direction)

Subject: 2022 Annual Monitoring Report on the Pembrokeshire Coast National Park Local Development Plan 2

Purpose of Report

1. The Annual Monitoring Report is a document which is produced by the Authority each October, looking back at the previous financial year, from 1 April to the 31 March.
2. The Report should assess the extent to which Local Development Plan 2 strategy and policies are being achieved.
3. The Report measures various indicators to assess the performance of the individual planning policies set out in the adopted Local Development Plan and to provide a general portrait of the social, economic and environmental conditions in the Park.
4. 'Key Findings' can be found at the beginning of the document which sets out where issues have arisen and what further action is required.
5. This is the first Annual Monitoring Report since the adoption of Local Development Plan 2 in September 2020 covering the financial year April 2021 to end of March 2022.

Risk considerations

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

Financial considerations

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

Equality considerations

8. The Public Equality Duty requires the Authority to have due regard to the need to eliminate discrimination, promote equality of opportunity and foster good relations between different communities. This means that, in the formative stages of our policies, procedure, practice or guidelines, the Authority needs to take into account what impact its decisions will have on people who are protected under the Equality Act 2010 (people who share a protected

characteristic of age, sex, race, disability, sexual orientation, gender reassignment, pregnancy and maternity, and religion or belief). This is a monitoring report and does not contain policy, procedure, practice or guidelines.

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

Welsh Language considerations

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

Human Rights considerations

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

Recommendation

That the attached Annual Monitoring Report (and appendices) for the Pembrokeshire Coast National Park Local Development Plan 2 be approved for submission to the Welsh Government by the 31st October 2022.

Background Documents

[Pembrokeshire Coast National Park Local Development Plan 2 Development Plans Manual Edition 3 Welsh Government](#)
[Welsh Statutory Instrument 2005 No. 2839 The Town & Country Planning \(Local Development Plan\) \(Wales\) Regulations 2005](#)
[Welsh Statutory Instrument 2015 No.1598 The Town & Country Planning \(Local Development Plan\) \(Wales\) \(Amendment\) Regulations 2015](#)

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

Pembrokeshire Coast National Park

Local Development Plan 2

(end date 2031)

Annual Monitoring Report 1
October 2022

Pembrokeshire Coast National Park Authority



Parc Cenedlaethol
Arfordir Penfro
Pembrokeshire Coast
National Park

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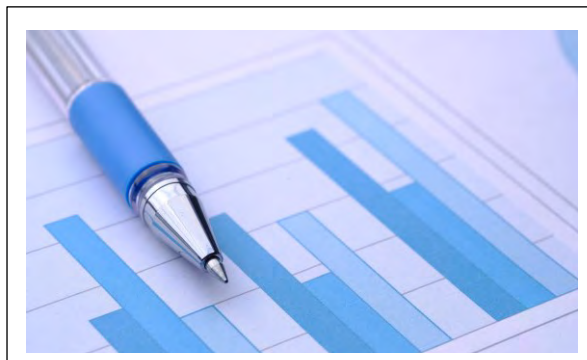
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1. INTRODUCTION

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



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



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

1.4 This first report is for the financial year April 2021 to end of March 2022.



2. KEY TRENDS AT A GLANCE




LDP Indicator No.	Topic	Performance Versus Target
1	Contrary to Recommendation	Continue Monitoring
2	National Park Purposes	Further Investigation/ Research Required A proposal approved contrary to recommendation at Development Management Committee was highlighted as the site was partially within a C2 flood zone and within a coastal risk management area defined in LDP2. It is also contrary to Policy 41 which directs new camping sites to appropriate locations. The proposal was also contrary to Policies 8 and 14 of LDP which protect the National Park and its special qualities.
3	Sustaining Communities	Continue Monitoring
4	Special Qualities	Further Investigation/Research Required – See above for Indicator 2
5	Welsh Language	Continue Monitoring
6	Landscape Seascape	Continue Monitoring
7	Greenfield	Continue Monitoring
	Open Space	Continue Monitoring
	GreenWedge	Continue Monitoring
8	Major Development	Continue Monitoring
9	Minerals Applications	Continue Monitoring
10	Waste Management	Continue Monitoring
11	Sustainable Design	Continue Monitoring
12	Renewable Energy Heat	Continue Monitoring
13	Renewable Energy Electricity	Continue Monitoring
14	Renewable Guidance	Continue Monitoring
15	Flooding	Further Investigation/Research Required – See above for Indicator 2
16	Recreation	Continue Monitoring
17	Hotels	Continue Monitoring
18	Self Catering	Continue Monitoring
19	Caravan & Camping	Further Investigation/Research Required – See above for Indicator 2
20	Employment	Continue Monitoring
21	Loss of Employment	Continue Monitoring
22	Indicator withdrawn by WG	
23	Affordable Housing	Continue Monitoring
24	All Housing	Continue Monitoring
25	Viability	Continue Monitoring
26	Gypsy Sites	Continue Monitoring
27	Density	Continue Monitoring
28	Mix of housing	Continue Monitoring

LDP Indicator No.	Topic	Performance Versus Target
29	Spatial Distribution	Continue Monitoring
30	Tenure of Housing	Continue Monitoring
31	Community Facilities	Continue Monitoring
32	Planning Obligations	Continue Monitoring
33	Retail Hierarchy	Continue Monitoring
34	Vacant Retail Space	Continue Monitoring
35	Transport	Continue Monitoring

Sustainability Appraisal Indicator No.	Topic	Analysis
1	Agriculture & Forestry	Further data is required to make conclusions – latest data included.
2	Travel	Performance remains acceptable
3	Special Qualities	Further Investigation Required: Performance here is of concern as the special qualities are core to the National Park designation. See commentary under Indicator 2 for the policies of the Annual Monitoring Report.
4	Recreation	Performance remains acceptable
5	Visitors at off peak times	Further data is required to make conclusions – latest data included.
6	Adapting to Climate Change	Further Investigation Required: Performance here is of concern as the proposal was approved in a flood zone. See commentary under Indicator 2 for the policies of the Annual Monitoring Report.
7	Factors contributing to climate change	Performance remains acceptable
8	Sustainable Communities	Performance remains acceptable
9	Access to Housing	Performance remains acceptable
10	Cultural Distinctiveness	Performance remains acceptable
11	Minerals	Performance remains acceptable
12	Waste	Performance remains acceptable
13	Community Facilities	Performance remains acceptable
14	Biodiversity enhancement	Performance remains acceptable
15	Water Quality	The strategy of the Plan is not affected by current issues with phosphorous elsewhere in Pembrokeshire.

3. MONITORING INDICATORS

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

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

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

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

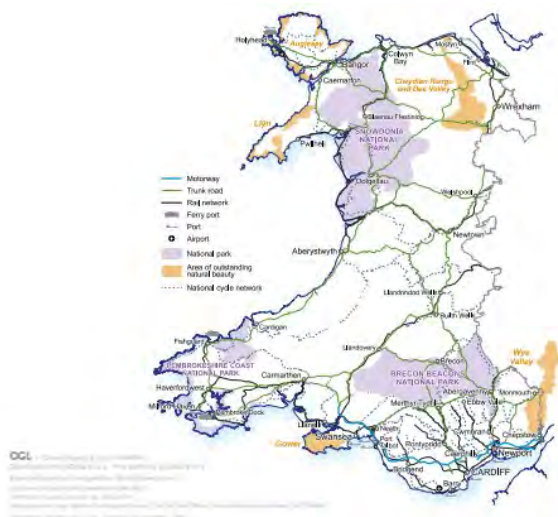
NATIONAL PARK PURPOSES AND DUTY AND THE SPATIAL STRATEGY

KEY OUTCOMES

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

CONTEXT

3.5 Future Wales: the National Plan 2040¹ The National Plan is the highest tier of development plan in Wales and is focused on land use planning issues and challenges at a national scale. The purpose of the National Plan is to set out where Welsh Government considers Wales should grow and the types of development needed over the next twenty years to help Wales be a sustainable and prosperous society. The Welsh Government published its new spatial strategy for Wales on 24 February 2021.



3.6 Future Wales: The National Plan 2040 replaces the previous Wales Spatial

Plan. Unlike the Wales Spatial Plan, the National Plan has development plan status and therefore will be of greater significance.

3.7 The National Plan is a large piece of the planning jigsaw in Wales. The hierarchy of development plans is:

- Future Wales: The National Plan 2040
- Strategic Development Plans (SDPs)
- Local Development Plans (LDPs)

3.8 SDPs and LDPs must be consistent with the National Plan. The National Plan will also be relevant to large scale infrastructure projects through the Developments of National Significance (DNS) process. So, whilst the National Plan is a Wales-wide plan, it will inform decisions on nationally significant infrastructure projects and will affect future planning policy at a local level.

3.9 A review of the contents of Future Wales has been undertaken and the implications for the Pembrokeshire Coast National Park are set out in Appendix 3.

3.10 The review concludes that this publication does not trigger a review to the Local Development 2. Appendix 3 highlights in blue those elements of the Local Development Plan which will require an update and what can be

¹ <https://planningaidwales.org.uk/future-wales-the-national-plan-2040/>

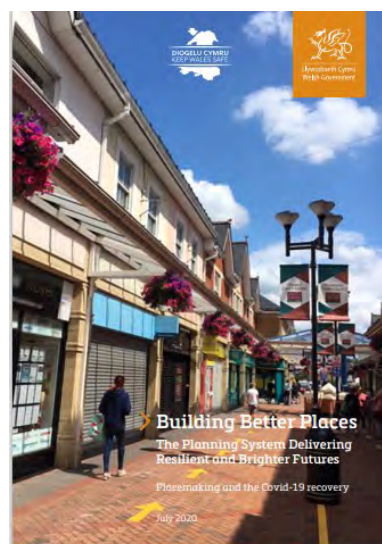
3.11 taken into account for development management purposes in the interim. Planning Policy Wales Edition 11² This edition was published in February 2021 after Local Development Plan 2 was adopted (September 2020). A review has been undertaken of the document to identify any new matters that need need to be taken into account.

3.12 Appendix 4 contains that review. This review has resulted in no issues of a substantive nature arising for Local Development Plan 2 which would trigger a review at this stage. Additional issues to take account of in the interim through development management are also highlighted in blue.



Building Better Places The Planning System Delivering Resilient and Brighter Futures (July 2020)³ sets out the Welsh Government's

planning policy priorities to assist in taking action in the recovery period after the Covid-19 pandemic crisis. The document highlights the policy priorities and actions which should be used in the environmental, social, cultural and economic recovery of Wales. The pandemic crisis has highlighted the need for good quality places for people to live, work and relax in. We have also seen the importance of local services and infrastructure with people spending more time locally. The document also highlights that whilst there is undoubtedly a need for economic recovery, which the planning system should facilitate, this should not be at the expense of quality, both in terms of health and well-being and in response to the climate and nature emergencies.



3.13 A review has been undertaken of the document to identify any new matters that need need to be taken into account.

3.14 Appendix 5 contains that review. This review has resulted in no issues of a substantive nature arising for Local Development Plan 2 which would trigger a review at this stage. Additional issues to take account of in

² [Planning Policy Wales - Edition 11 \(gov.wales\)](https://gov.wales/sites/default/files/publications/2021-02/planning-policy-wales-edition-11_0.pdf)
https://gov.wales/sites/default/files/publications/2021-02/planning-policy-wales-edition-11_0.pdf

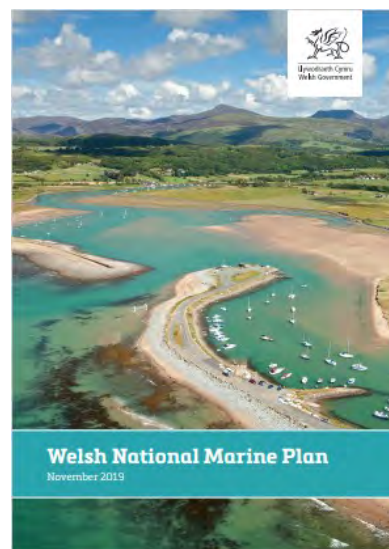
³ [Building Better Places: The Planning System delivering Resilient and Brighter Futures - placemaking and the Covid-19 recovery \(gov.wales\)](https://gov.wales/sites/default/files/publications/2020-07/building-better-places-the-planning-system-delivering-resilient-and-brighter-futures.pdf)
https://gov.wales/sites/default/files/publications/2020-07/building-better-places-the-planning-system-delivering-resilient-and-brighter-futures.pdf

the interim through development management are highlighted in blue.

Wales Marine Plan (Nov 2019) ⁴

- 3.15 The Welsh National Marine Plan was published in November 2019 and is intended to support the sustainable development of the seas around Wales, covering inshore and offshore areas for the next 20 years. It sets out the Welsh Government's ambitions for the future use of marine natural resources and how various users of the seas should interact and consider each other's activities and future plans.
- 3.16 The Marine and Coastal Access Act (2009) requires public authorities to take relevant authorisation or enforcement decisions in accordance with the Welsh National Marine Plan unless relevant considerations indicate otherwise. Public authorities are also required to have regard to the appropriate marine policy documents in making any decision which relates to the exercise of any function capable of affecting the whole or any part of the UK marine area.
- 3.17 Alongside the Plan detailed Implementation Guidance⁵ is provided as well as a 'Considering Marine Plans Terrestrial Infographic'⁶.
- 3.18 Appendix 6 contains an overview of those policies that are most likely to be relevant in the day to day decision making of the National Park Authority. This overview has resulted in no issues of a substantive nature arising for Local

Development Plan 2 which would trigger a review of the Local Development Plan at this stage. Updates the Local Development Plan at review stage are highlighted in blue.



Community Facilities Survey

- 3.19 For the review of Local Development Plan 1 a survey of community facilities in settlements was undertaken in 2017. Those with at least 3 facilities normally found in a small village were **designated as 'Rural Centres'** in LDP2. Policy 54 of the Local Development Plan also protects against unnecessary loss of community facilities, and prioritises the re-use of land for employment uses or affordable housing where a loss of the facilities is justified.
- 3.20 In terms of facilities available that qualify Centres as Rural Centres there has been a loss of qualifying facilities in two split Centres outside the Authority's planning jurisdiction. The extent of the settlements in the Authority's jurisdiction is not significant in scale. There will be a need to continue monitoring to appraise at review stage and also to consider the need to comment on the Council's Local Development Plan 2

⁴ <https://gov.wales/welsh-national-marine-plan-document>


⁵ <https://gov.wales/sites/default/files/publications/2020-06/welsh-national-marine-plan-implementation-guidance.pdf>

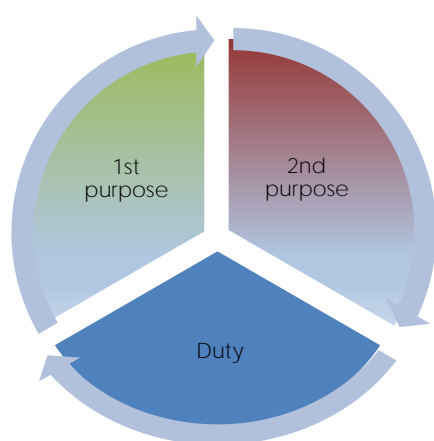
⁶ <https://gov.wales/sites/default/files/publications/2021-01/considering-marine-plans-terrestrial-planning-permission-infographic.pdf>

community facilities policy when the opportunity arises. In terms of the larger Centres the range of facilities required to qualify these Centres as Tier 1 and Tier 2 Centres remain. The main findings are:

- - an increase in the number of primary schools in Tenby
- - a small reduction in the number of pubs in Tenby and Saundersfoot.

POLICY PERFORMANCE

INDICATOR 1								
DECISIONS CONTRARY TO RECOMMENDATION								
TARGET IS 0								
TRIGGER: 3% OF PLANNING APPLICATIONS ⁷ DECIDED CONTRARY TO RECOMMENDATION IN ANY ONE YEAR.								
Year	Total Decisions	Contrary	Trigger	Target	Performance	Action	Analysis	Overview
2021 - 2022	363	1	3%	0%	0%	Continue Monitoring	Performance remains below the Trigger point.	




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


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

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

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

⁷ Full, outline or reserved matters applications.

INDICATOR 2 (OVERARCHING)						
POLICY 1 DECISIONS CONTRARY TO SANDFORD PRINCIPLE OR WHICH RESULT IN CONFLICTS BETWEEN THE DUTY AND PURPOSES.						
TARGET IS 0						
TRIGGER: 0 APPLICATIONS APPROVED CONTRARY TO THE SANDFORD PRINCIPLE IN ANY ONE YEAR.						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	1	0	1	Further Investigation/ Research Required	Extract from Officer Report: <i>There is a fundamental policy objection to development in this location which is partially within a C2 flood zone and within a coastal risk management area defined in LDP2. It is also contrary to Policy 41 which directs new camping sites to appropriate locations and to Policies 8 and 14 of LDP which protect the National Park and its special qualities.</i>	

INDICATOR 3						
DECISIONS CONTRARY TO POLICY 7, POLICY 43, POLICY 44, POLICY 48, POLICY 54 – PRIORITISE COMMUNITY USES.						
TARGET IS 0						
TRIGGER: APPROVAL OF 2 PLANNING APPLICATIONS CONTRARY TO A POLICY IN ANY ONE YEAR.						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	2	0	0	Continue Monitoring	Performance remains below the Trigger point.	



Skrinkle Community Hub
under construction
August 2022

SPECIAL QUALITIES

KEY OUTCOMES

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

CONTEXT

3.21 Future Wales: the National Plan 2040⁸ was published after Local Development Plan 2 was adopted. It advises 'National Park Authorities are unique planning entities with a specific remit to reflect the distinctive characteristics of their areas. National Parks are at the heart of resilient ecological networks and have a key role to play in Strategic Development Plans as part of the sustainable management of natural resources, protecting Wales's cultural heritage and promoting health and well-being. Future Wales policies respect the functions of National Parks in terms of their statutory purposes. At the regional scale, where National Park Authorities will be considered in the context of a wider spatial region, their statutory duty must inform Strategic Development Plans. Planning Policy Wales sets out the wider planning policy context for National Parks.

3.22 Planning Policy Wales Edition 11 February 2021 adds a paragraph regarding National Parks: 6.3.11 National Park Authorities will be involved in the preparation of Strategic Development Plans. The Strategic Development Plan areas will be the area of the Corporate Joint Committee and include all or part of any National Park Authority within the Corporate Joint Committee area. National Park Authorities are members of Corporate Joint Committees for strategic development planning purposes. Membership of a Corporate Joint Committee does not affect the statutory purposes of National Parks.



3.23 Wales Marine Plan (Nov 2019)⁹ Paragraph 127. Designated Landscapes are acknowledged at an international level by the

⁸ <https://planningaidwales.org.uk/future-wales-the-national-plan-2040/>

⁹ <https://gov.wales/welsh-national-marine-plan-document>

International Union for Conservation of Nature (IUCN) as Category V Protected Areas, valued as living landscapes for their interaction between natural and human elements. Five of the eight Welsh Designated Landscapes were designated on account of their spectacular coastal scenery and coastal character. In **Pembrokeshire, Wales has the UK's** only fully coastal National Park. Some 54% of the Welsh coast is designated as either a National Park or AONB.

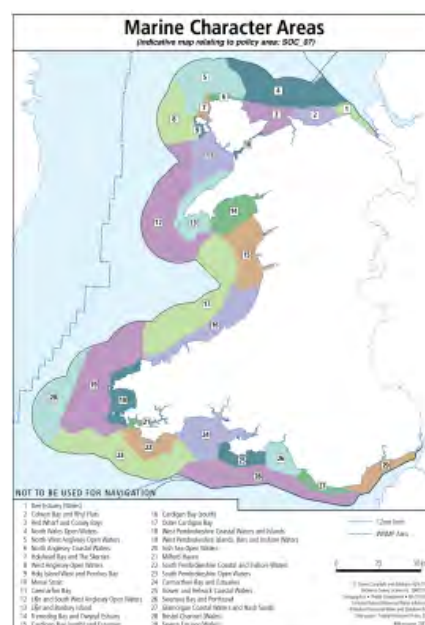
SOC_06: Designated landscapes

Proposals should demonstrate how potential impacts on the purposes and special qualities for which National Parks or Areas of Outstanding Natural Beauty have been designated have been taken into consideration and should, in order of preference:

- avoid adverse impacts on designated landscapes; and/or
- minimise impacts where they cannot be avoided; and/or
- mitigate impacts where they cannot be minimised.

If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding.

Opportunities to enhance designated landscapes are encouraged.



SOC_07: Seascapes

Proposals should demonstrate how potential impacts on seascapes have been taken into consideration and should, in order of preference:


- avoid adverse impacts on seascapes; and/or
- minimise impacts where they cannot be avoided; and/or
- mitigate impacts where they cannot be minimised.


If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding.

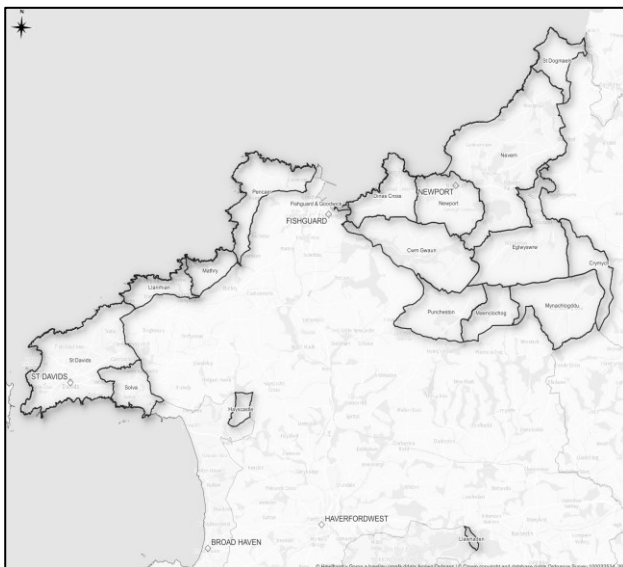
Opportunities to enhance seascapes are encouraged.

POLICY PERFORMANCE


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

INDICATOR 4						
DECISIONS CONTRARY TO POLICY 8						
TARGET IS 0						
TRIGGER: APPROVAL OF 2 PLANNING APPLICATIONS CONTRARY TO ANY CRITERION IN ANY ONE YEAR.						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	2	0	1	Further Investigation/ Research Required	The application was recommended for refusal as it was contrary to Policy 8 by causing harm to the Special Qualities of the National Park's landscape. Members approved the application contrary to recommendation having considered all relevant planning policies and other material planning considerations. The target of 0 was not achieved. The trigger of 2 approvals contrary to recommendation has not been breached.	


INDICATOR 5						
DECISIONS CONTRARY TO POLICY 13 WELSH LANGUAGE						
TARGET IS 0						
TRIGGER: APPROVAL OF 2 PLANNING APPLICATIONS CONTRARY TO THE POLICY IN ANY ONE YEAR.						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	2	0	0	Continue Monitoring	Performance remains below the Trigger point	





Welsh
Language
Sensitive Areas

INDICATOR 6						
DECISIONS CONTRARY TO POLICY 14 LANDSCAPE & SEASCAPE						
TARGET IS 0						
TRIGGER: APPROVAL OF 2 PLANNING APPLICATIONS CONTRARY TO THE POLICY WITH ITS SUPPORTING GUIDANCE IN ANY ONE YEAR.						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	2	0	1	Further Investigation/ Research Required	The application was recommended for refusal as it was contrary to Policy 14 by introducing a use incompatible with location, failing to harmonise with or enhance the landscape and result in development of the undeveloped coast. Members approved the application contrary to recommendation having considered all relevant planning policies and other material planning considerations. The target of 0 was not achieved. The trigger of 2 approvals contrary to recommendation has not been breached.	

INDICATOR 7
DECISIONS CONTRARY TO POLICY 15 OR POLICY 16
TARGET IS 0 % LOSS OF GREENFIELD ¹⁰ , OPEN SPACE ¹¹ , GREEN WEDGE
TRIGGER: APPROVAL OF 1 PLANNING APPLICATIONS CONTRARY TO RECOMMENDATION IN ANY ONE YEAR.

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

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

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

¹⁰ Except for land released in accordance with the Plan's policies.

¹¹ Except where they can be retained, enhanced or alternative provision can be made.

MAJOR DEVELOPMENT, THE POTENTIAL FOR GROWTH

KEY OUTCOMES


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

CONTEXT

- 3.24 Minerals: The annual monitoring of reserves and the 2nd review of the Regional Technical Statement for the North Wales and South Wales Regional Aggregate Working Parties will continue to inform planning decisions on a regional and national basis. The 2nd review was endorsed by Welsh Government in December 2020 and noted by Pembrokeshire Coast National Park Authority Members. The purpose of the RTS is to ensure that an adequate and steady supply of aggregates can be maintained throughout Wales (and beyond, in the case of materials that are exported) taking into account the key objectives of sustainable supply of minerals set out in Minerals Technical Advice Note 1. Pembrokeshire Coast National Park Authority continues to work with neighbouring authorities on a Statement of Sub-Regional Collaboration for the West Wales sub-region for sand and gravel.
- 3.25 Waste: The first report for the new region of Mid and South West Wales Waste Planning Monitoring Report covers the period 2021-22. Information on the **region's waste management / resources recovery facilities** is required in order to monitor implementation of 'Towards Zero Waste: One Wales One Planet (TZW, 2010) – The Overarching Waste Strategy Document for Wales'. The report was submitted to Welsh Government in March 2022. It is yet to be published, but highlights the following key findings:
- Overall, the region is meeting targets in respect of reducing local authority collected waste, increasing recycling and composting and reducing landfilled biodegradable municipal waste, reusing, recovering and recycling industrial and commercial waste and construction and demolition waste and reducing the amounts of hazardous waste landfilled.


- There is insufficient capacity in 'other recovery'¹² facilities in the region. The economic case for creating further capacity within the region is weakened by existing contracts and the subsequent lack of sufficient waste available.
- There is a similar case for food waste in the region following recent developments such as Severn Trent's Stormy Down facility which takes waste from most of the authorities in the Mid and South West Wales region to some degree. However, it must be noted that with the change in regional structure, the Stormy Down facility is now located outside the Mid and South west Wales area.
- The predicted remaining landfill capacity for the region is 7.5 years, which is above the 7 year landfill void trigger set out in Technical Advice Note 21: Waste. However, this figure is dependent on several assumptions and as such continuous monitoring is required.
- Following the introduction of the new household recycling and waste collection service in November 2019, Pembrokeshire is now Wales' top recycler.


POLICY PERFORMANCE

INDICATOR 8						
APPROVAL OF MAJOR DEVELOPMENT ¹³ UNLESS EXCEPTIONAL CIRCUMSTANCES PROVEN						
TARGET IS 0						
TRIGGER: APPROVAL OF 1 PROPOSAL WHERE NO EXCEPTIONAL CIRCUMSTANCES SHOWN						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	1	0	0	Continue Monitoring	Performance remains below the Trigger point.	

¹² Other recovery can include incineration, pyrolysis, gasification, anaerobic digestion, energy from waste and landspreading of compost like output.

¹³ What constitutes 'major development' and 'exceptional circumstances' in National Parks is defined in Planning Policy Wales.

INDICATOR 9						
APPROVAL OF MINERALS DEVELOPMENT ¹⁴ UNLESS EXCEPTIONAL CIRCUMSTANCES PROVEN						
TARGET IS 0						
TRIGGER: APPROVAL OF 1 PROPOSAL WHERE NO EXCEPTIONAL CIRCUMSTANCES SHOWN						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	1	0	0	Continue Monitoring	Performance remains below the Trigger point.	

INDICATOR 10						
DECISIONS CONTRARY TO POLICY 27, 28 WASTE MANAGEMENT FACILITIES						
TARGET IS 0						
TRIGGER: APPROVAL OF 2 PLANNING APPLICATIONS CONTRARY TO THE POLICIES						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	2	0	0	Continue Monitoring	Performance remains below the Trigger point.	

¹⁴ What constitutes 'exceptional circumstances' in National Parks is defined in Planning Policy Wales.

CLIMATE CHANGE, SUSTAINABLE DESIGN, FLOODING, SUSTAINABLE ENERGY

KEY OUTCOMES

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


CONTEXT


- 3.26 Flooding: Welsh Government made available an updated Technical Advice Note 15 on flooding in September 2021 which also incorporates coastal erosion. The intention was for it to come into affect at the beginning of December 2021. The policy guidance contained in the Technical Advice Note is much stricter in terms of not permitting highly vulnerable development (houses, schools, hospitals etc) in areas of risk from flooding or erosion. The Technical Advice Note also takes into account climate change to forecast future flood risks and requires higher thresholds for flood defences. In addition the Development Advice Maps will be replaced with new Flood Maps for Planning, developed and published by Natural Resources Wales.
- 3.27 In response to concerns raised by Local Planning Authorities, Julie James, Minister for Climate Change, wrote to all local planning authorities in November 2021 announcing a postponement in the coming into force of the revised Technical Advice Note until 1st June 2023 to allow full consideration of the impact of the new guidance. In the meantime the existing Technical Advice Note and Development Advice Map remains as the framework for assessing flood risk.
- 3.28 **The Minister's letter also required every local planning authority** complete (or review) a strategic flood consequence assessment for their area, individually or on a regional basis. In response, the National Park Authority has joined with other planning authorities in south-west Wales to commission consultants to undertake a Regional Strategic Flood Consequence Assessment for the region the publication of which is due (October 2022). Separately, Carmarthenshire County Council and Pembrokeshire County Council have also commissioned consultants to carry out some more detailed

local work on the same topic in conjunction with the emerging the emerging Development Plans of each authority. This work is at an earlier stage.

- 3.29 Welsh Development Quality Requirements 2021¹⁵. 'This standard will be applied in full to all publicly-funded affordable housing schemes submitted to Welsh Government at "concept" stage for technical scrutiny from 01 October 2021. New affordable homes delivered through planning agreements (under section 106 of the Town and Country Planning Act 1990) and planning conditions will only be required to meet the Appendix A and Appendix B "space requirements" for agreements entered into after 01 October 2021. We will keep this under regular review.'

POLICY PERFORMANCE


INDICATOR 11						
DECISIONS CONTRARY TO POLICY 29 'SUSTAINABLE DESIGN' CRITERION C), E), G), H) OR I).						
TARGET IS 0						
TRIGGER: APPROVAL OF 3 PLANNING APPLICATIONS CONTRARY TO ANY ONE OF THE POLICY'S CRITERIA						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	3	0	0	Continue Monitoring	Performance remains below the Trigger point.	

INDICATOR 12					
RENEWABLE ENERGY CAPACITY OF RENEWABLE ENERGY SCHEMES PERMITTED AND COMPLETED.					
TARGET IS 9.8GWH FOR RENEWABLE HEAT ¹⁶					
Year	Target	Performance	Action	Analysis	Overview
2021-2022	Planning Permissions to contribute to an overall	0.46 GWh from 5 permissions granted since 2016 (base date of Renewable	Continue Monitoring	There has been a small increase in capacity as a result of relatively small scale, domestic installations permitted. Renewable Energy from micro household	

¹⁵ <https://gov.wales/sites/default/files/publications/2021-08/development-quality-requirements-for-housing-associations.pdf>


¹⁶ This target is aspirational, dependent upon a range of factors in the future such as government changes in policy, funding opportunities/constraints, as well as other external factors.


	renewable Heat Target for the National Park of 9.8 GWh.	Energy Assessment Update)		renewable schemes and small scale non domestic schemes generally benefit from Permitted Development Rights and therefore are not included in the overall Heat generation capacity.	
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INDICATOR 13					
RENEWABLE ENERGY CAPACITY OF RENEWABLE ENERGY SCHEMES PERMITTED AND COMPLETED.					
TARGET IS 38.9GWH FOR RENEWABLE ELECTRICITY ¹⁷					
Year	Target	Performance	Action	Analysis	Overview
2021-2022	Planning Permissions to contribute to an overall Renewable Electricity Target for the National Park of 38.9 GWh.	0.035 GWh from 9 permissions granted since 2016 (base date of the Renewable Energy Assessment Update)	Continue Monitoring	There has been a small increase in capacity as a result of relatively small scale, domestic installations permitted. Renewable Energy from micro household renewable schemes and small scale non domestic schemes generally benefit from Permitted Development Rights and therefore are not included in the overall Electricity generation capacity.	

INDICATOR 14
DECISION MAKING IS CONSISTENT WITH THE AUTHORITY'S RENEWABLE ENERGY POLICY AS SUPPORTED BY THE RENEWABLE ENERGY SUPPLEMENTARY PLANNING GUIDANCE AND CUMULATIVE IMPACT OF WIND TURBINES ON LANDSCAPE AND VISUAL AMENITY SUPPLEMENTARY PLANNING GUIDANCE
TARGET IS 0 APPROVALS CONTRARY

¹⁷ This target is aspirational, dependent upon a range of factors in the future such as government changes in policy, funding opportunities/constraints, as well as other external factors.

TRIGGER: 3 OR MORE DECISIONS CONTRARY TO POLICY 33 RENEWABLE ENERGY IN CONJUNCTION WITH ITS SUPPORTING SUPPLEMENTARY PLANNING GUIDANCE						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	3	0	0	Continue Monitoring	Performance remains below the Trigger point.	

INDICATOR 15						
FLOODING: AMOUNT OF DEVELOPMENT (BY TAN 15 PARAGRAPH 5.1 DEVELOPMENT CATEGORY) PERMITTED IN C1 AND C2 FLOODPLAIN AREAS NOT MEETING ALL TAN 15 TESTS (PARAGRAPH 6.2 I-V)						
TARGET IS DEVELOPMENT IS NOT PERMITTED WHERE THE LONG TERM SCENARIO (IN THE NEXT 100 YEARS) WOULD FAIL THE TESTS SET OUT ACROSS.						
TRIGGER: 1 DEVELOPMENT PERMITTED CONTRARY TO POLICY 34						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	1	0	1	Further Investigation / Research Required	See below for analysis	

Analysis:

The application was recommended for refusal as it was partially within a C2 flood zone and within a coastal risk management area. Members approved the application contrary to recommendation having considered all relevant planning policies and other material planning considerations. The target of 0 was not achieved. The trigger of 1 approval contrary to recommendation has been breached.

VISITOR ECONOMY, EMPLOYMENT AND RURAL DIVERSIFICATION

KEY OUTCOMES

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

CONTEXT

3.30 Welsh Government and policy for second homes and short-term holiday lets¹⁸: The National Park Authority continues to engage with Welsh Government and local stakeholders such as Pembrokeshire County Council on Welsh Government initiatives. In summary the Authority:

- a. Would support legislation to make a change to the definition of development to underpin the Use Class Order proposed changes.
- b. Would support the need for more Welsh Government research to be done to assist planning authorities in understanding the evidence thresholds required to pursue different planning policy approaches.

3.31 Welsh Government¹⁹ announced on the 4th of July 2022 a package of measures including:

- *Changes to planning regulations by the end of the summer. These will introduce three new planning use classes – a primary home, a second home and short-term holiday accommodation. Local planning authorities, where they have evidence, will be able to make amendments to the planning system to require planning permission for change of use from one class to another. We will also introduce changes to national planning policy to give local authorities the ability to control the number of second homes and holiday lets in any community.*
- *Plans to introduce a statutory licensing scheme for all visitor accommodation, including short-term holiday lets, making it a requirement to obtain a license. This will help raise standards across the tourism industry.*
- *Following a consultation about varying land transaction tax locally in areas with large numbers of second homes, work will start today (Monday 4 July) with local authorities to develop a national framework so they can request increased land transaction tax rates for second homes and holiday lets to be applied in their local area.*

3.32 The Welsh Government has also announced the potential to increase to the maximum level of council tax premiums for second homes, alongside a new local tax rules for

¹⁸ [Planning legislation and policy for second homes and short-term holiday lets | GOV.WALES](#)

¹⁹ <https://gov.wales/new-package-measures-address-high-numbers-second-homes#:~:text=The%20Welsh%20Government%20has%20already,fair%20contribution%20to%20their%20local>

holiday lets on the 1st March 2022. The maximum level at which local authorities can set council tax premiums on second homes and long-term empty properties will be increased to 300%, which will be effective from April 2023. The criteria for self-catering accommodation being liable for business rates instead of council tax will also change from April 2023. Currently, properties that are available to let for at least 140 days, and that are actually let for at least 70 days, will pay rates rather than council tax. The change will increase these thresholds to being available to let for at least 252 days and actually let for at least 182 days in any 12-month period.²⁰


- 3.33 Officers are working with colleagues in the County Council to understand and respond to the implications of these changes for Pembrokeshire.
- 3.34 Camping and Caravanning developments: Adoption of Local Development Plan 2 brought a change of policy for camping and caravanning developments. Local Development Plan 1 continued a long-standing policy of restraint for further caravan and camping sites due to the significant number already within the National Park. Whilst operating the LDP1 policy, issues emerged with Certificated camping sites and 28-day sites, both outside planning control. An increasing number of sites were appearing in the Park through these means, with Certification being a regular default for landowners refused planning permission or given pre-planning advice that a site would be contrary to policy. The prolific number of 28-day sites also overwhelmed the **Authority's ability to monitor** activity and the protracted enforcement process is not effective in dealing with those sites operating beyond the 28 days. As a result the Authority was receiving an increasing number of Certificate of Lawfulness applications for large camping and caravan sites.
- 3.35 As part of the evidence base for Local Development Plan 2, in 2015 a study was undertaken to explore the potential for the National Park landscape to safely absorb additional camping and caravan development without harming its special qualities. The study informed the changes to the policy for Local Development Plan 2 and has also been published as Supplementary Planning Guidance. The Local Development Plan 2 policy for camping and caravanning development can be summarised as allowing for limited new development in appropriate locations – generally small sites away from the coast and Preseli Hills.
- 3.36 The outcome of relaxing the policy position on new sites needs to be monitored. Adoption of LDP2 has coincided with the Covid pandemic which has resulted in significant changes to the visitor economy in Pembrokeshire and a dramatic increase in the number of visitors using camping and caravanning accommodation. This has continued the demand for additional sites – largely through the Certification process, **but also in terms of 'fly-camping'** with favoured locations being the coast, beaches, laybys, rural car parks and viewpoints.
- 3.37 During the current monitoring period one new site and one alteration to an existing site has gained planning approval.
- 3.38 The Authority will continue to work with other organisations and authorities to protect the National Park for harmful and unauthorised development and raise awareness of


²⁰ [New tax rules for second homes | GOV.WALES](#)


the need for changes to the camping and caravanning legislation that will meet present day requirements with Welsh Government.


- 3.39 Welsh Government Consultation on Permitted Development: Following the temporary changes to permitted development during the Covid Pandemic, the Welsh Government published a consultation document in November 2021 on whether any or all of the changes should be made permanent. One of the changes proposed related to extending the current 28-day permitted development for land to be used as a camping site to 56 days. The Authority responded that the change should not be applied within the National Park as they are unregulated and impact on the landscape and special qualities. In addition such sites are in competition with established businesses that also require support in recovering from the Covid crisis. The number of unregulated sites has been increasing steadily within the National Park, even prior to 2020. The increase has become greater since 2020, resulting in a multi-agency response locally to deal with the consequences of camping which are affecting local communities, ecology and the landscape. More stringent measures are currently being considered by the Authority and partners.

POLICY PERFORMANCE

INDICATOR 16						
DECISIONS RELATING TO RECREATIONAL ACTIVITIES CONTRARY TO POLICY 38						
TARGET IS 0						
TRIGGER: APPROVAL OF 2 PLANNING APPLICATIONS CONTRARY TO THE POLICY IN CONJUNCTION WITH THE RECREATIONAL ACTIVITIES SUPPLEMENTARY PLANNING GUIDANCE						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	2	0	0	Continue Monitoring	Performance remains below the Trigger point.	


INDICATOR 17						
DECISIONS ON LOSS OF HOTELS – POLICY 39						
TARGET IS 0						
TRIGGER: APPROVAL OF 1 PLANNING APPLICATION CONTRARY TO THE POLICY						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	1	0	0	Continue Monitoring	Performance remains below the Trigger point.	


INDICATOR 18						
PRIORITISING AFFORDABLE HOUSING DELIVERY OVER SELF CATERING – POLICY 40						
TARGET IS 0						
TRIGGER: APPROVAL OF 2 APPLICATIONS CONTRARY TO POLICY 40 IN ANY ONE YEAR						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	2	0	0	Continue Monitoring	Performance remains below the Trigger point.	

INDICATOR 19						
CARAVAN AND CAMPING – POLICY 41						
TARGET IS 0						
TRIGGER: APPROVAL OF 2 OR MORE DEVELOPMENTS CONTRARY TO POLICY 41 WITH ITS SUPPORTING SUPPLEMENTARY PLANNING GUIDANCE						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	2	0	1	Further Investigation / Research Required	See below for analysis.	

Analysis:

The application was recommended for refusal as it was contrary to Policy 41 which directs new camping sites to appropriate locations. Members approved the application contrary to recommendation having considered all relevant planning policies and other material planning considerations. The target of 0 was not achieved. The trigger of 2 approvals contrary to recommendation has not been breached.

INDICATOR 20						
EMPLOYMENT - POLICY 43						
TARGET IS 0						
TRIGGER: APPROVAL OF 1 OR MORE PLANNING APPLICATIONS CONTRARY TO THE POLICY						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	2	0	0	Continue Monitoring	Performance remains below the Trigger point.	

INDICATOR 21						
EMPLOYMENT - POLICY 44						
TARGET IS 0						
TRIGGER: LOSS OF TWO OR MORE EMPLOYMENT SITES OR 500 SQ. METRES CONTRARY TO RECOMMENDATION						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	2	0	0	Continue Monitoring	Performance remains below the Trigger point.	

2E AFFORDABLE HOUSING AND HOUSING GROWTH

KEY OUTCOMES

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

CONTEXT

- 3.40 Housing Market: The nature of the housing market over the lifespan of the Local Development Plan is and will be the subject of much conjecture and conflicting forecasts. The link below provides detailed commentary on housing starts and completions in Wales recently.²¹
- 3.41 Welsh Government and policy for second homes and short-term holiday lets: The National Park Authority continues to engage with Welsh Government local stakeholders such as Pembrokeshire County Council on Welsh Government initiatives. More commentary is provided under the Sustainability Objectives chapter.
- 3.42 Local Housing Market Assessment July 2021: The Authority is party to a County wide housing market assessment which was finalised in the July 21.²² The study identifies housing needs both within and outside the National Park in Pembrokeshire – Table 5.18 which sets out the need for this National Park is copied below.

²¹ <https://gov.wales/new-house-building> copy and paste into the web browser

²² Local Housing Market Assessment July 2021 <https://www.pembrokeshire.gov.uk/local-development-plan-review/ldp2-evidence-base>

Table 5.18 Profile of new accommodation required in the National Park part of Pembrokeshire

Size of home	Owner occupied	Private rented	Homebuy/HWR	Shared Ownership/HTB	Social Rented
1 bedroom	22	12	4	3	30
2 bedroom	101	22	9	14	64
3 bedroom	189	27	18	19	56
4+ bedrooms	69	3	8	8	12
Total	381	65	39	44	162
Size of home	Owner occupied	Private rented	Homebuy/HWR	Shared Ownership/HTB	Social Rented
1 bedroom	3.2%	1.8%	0.6%	0.4%	4.4%
2 bedroom	14.6%	3.2%	1.3%	2.0%	9.2%
3 bedroom	27.4%	3.9%	2.6%	2.8%	8.1%
4+ bedrooms	10.0%	0.4%	1.2%	1.1%	1.8%
Total	55.2%	9.4%	5.6%	6.4%	23.5%

3.43 The overall findings of the Local Housing Market Assessment need to be considered alongside the targets set in the Local Development Plan 2. Policy 48 Affordable Housing identifies a target of delivery 362 affordable houses over the Plan period 2015 to 2031.

3.44 The Pembrokeshire Local Housing Market Assessment July 2021 identifies an affordable housing need of 245 (39 Homebuy, 44 Shared Ownership, 162 Social Rented) over the period 2020 to 2033 (this will exclude sites that are planned for completion in the period 2020 to 2025²³). The table below provides an opportunity to compare across a common period to check consistency in requirements. The table below shows the expectations of the Authority for affordable housing provision in Local Development Plan 2 are less than the need identified in the Local Housing Market Assessment – see highlighted totals for the last two columns. This means that every opportunity to secure affordable housing provision should be sought as Local Development Plan 2 is implemented.

April	March	LHMA 2020 to 2033 per annum distribution	LHMA est of forecast completions 2020 to 2025	LHMA Total Estimated Provision 2020 to 2033	LDP 2 Target/ Forecast 2015 to 2031	LDP 2 Target 2020 to 2031	LHMA 2020 to 2031
2015	2016				23		
2016	2017				23		
2017	2018				23		
2018	2019				23		

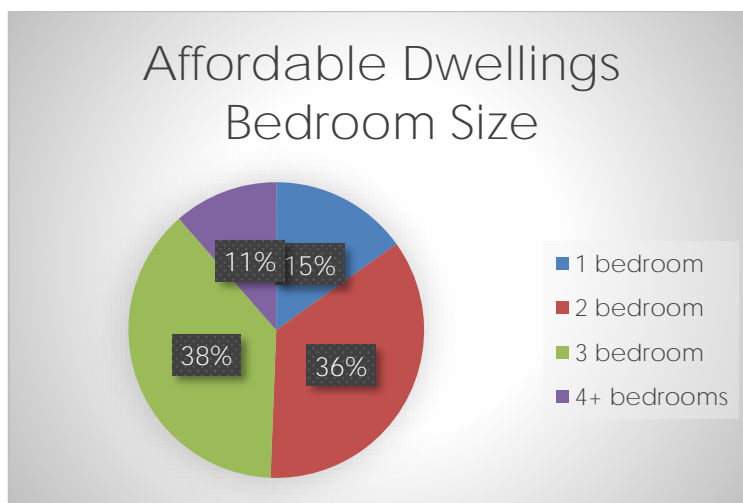
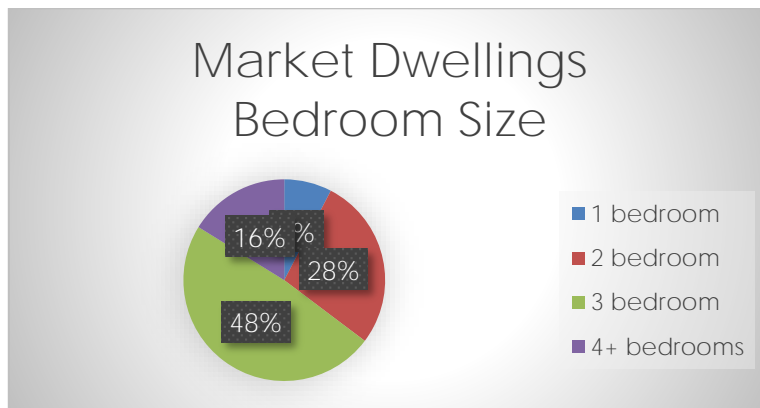
²³ Paragraph 4.26 of the Local Housing Market Assessment: The Council estimates that 500 new affordable homes are likely to be delivered in Pembrokeshire over the LHMA period (the next five years). Looking at forecasting for this planning authority an estimate of 100 affordable dwellings being completed is made for the Pembrokeshire Coast National Park.

April	March	LHMA 2020 to 2033 per annum distribution	LHMA est of forecast completions 2020 to 2025	LHMA Total Estimated Provision 2020 to 2033	LDP 2 Target/ Forecast 2015 to 2031	LDP 2 Target 2020 to 2031	LHMA 2020 to 2031
2019	2020				23		
2020	2021		39	39	23	23	39
2021	2022		15	15	23	23	15
2022	2023		15	15	23	23	15
2023	2024		15	15	23	23	15
2024	2025		15	15	23	23	15
2025	2026	31		31	22	22	31
2026	2027	31		31	22	22	31
2027	2028	31		31	22	22	31
2028	2029	31		31	22	22	31
2029	2030	31		31	22	22	31
2030	2031	31		31	22	22	31
2031	2032	31		31			
2032	2033	31		31			
		245	99	344	362	247	283

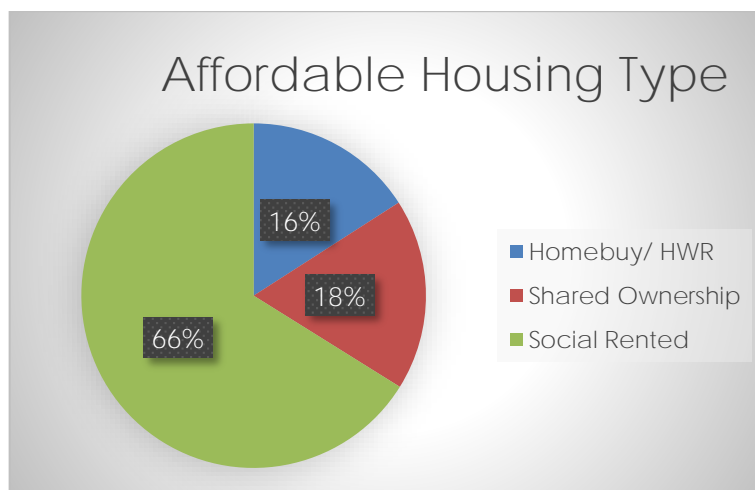
3.45 An additional policy area that the Local Housing Market Assessment can provide evidence for is Policy 52 Housing Mix. The policy seeks to ensure that all new housing development will be required to include a mix of dwelling sizes, types and tenures having regard to the current evidence of housing need in the National Park. This will mean that the Authority can expect to see a mix of housing on site (i.e not only the affordable housing element but the market housing as well) that reflects a mix of bedroom sizes as reflected in Table 5.18 above which is taken from the Local Housing Market Assessment.

3.46 When we consider bedroom size requirements for market dwellings and affordable housing overall the following requirements emerge for those elements being provided on site once overall split between market housing and affordable housing has been considered²⁴:

²⁴ Policy 47 Housing Allocations or Land with Planning Permission and Policy 48 Affordable Housing sets out the percentage requirements for affordable housing for individual sites and for windfall sites in submarket areas.



3.47 The split between the various types of affordable housing required overall is also quantified in the Housing Market Assessment:



Note: HWR means 'Homes within Reach'

- 3.48 The National Park Authority is working with Pembrokeshire County Council on the preparation of Affordable Housing Supplementary Planning Guidance using this updated evidence. Part of that work involves exploring the development of a Pembrokeshire shared ownership product.








POLICY PERFORMANCE

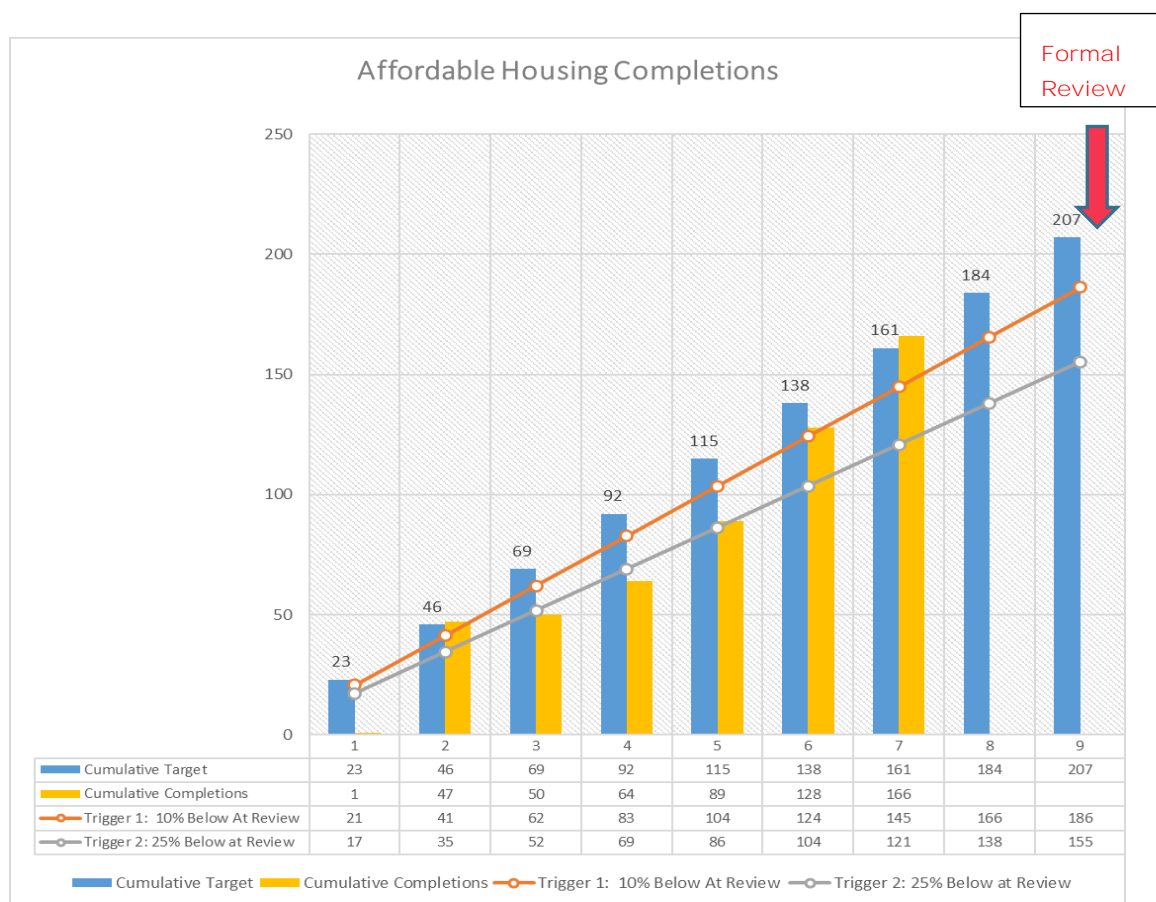
- 3.49 Indicator 22 minimum 5 years land effectively available is no longer being applied by Welsh Government.

Affordable Housing Development

INDICATOR 23
POLICY 47, POLICY 48, POLICY 49 - THE NUMBER OF NET ADDITIONAL AFFORDABLE DWELLINGS BUILT
TARGET: 362 AFFORDABLE DWELLINGS BUILT OVER THE PLAN PERIOD
TRIGGER: COMPLETIONS 10% BELOW THE TARGET EXPECTED BY THE FORMAL PLAN REVIEW PERIOD(REVIEW TRIGGER IS BEFORE SEPTEMBER 2024 YEAR 4 OF THE ADOPTED PLAN). UNDERTAKE RESEARCH TO ESTABLISH REASONS AND DEPENDENT ON FINDINGS CONSIDER WHETHER ACTIONS ARE NECESSARY TO INCREASE SUPPLY.
COMPLETIONS 25% LESS THAN TARGETS – DETERMINE ACTIONS TO INCREASE SUPPLY OF AFFORDABLE HOUSING, INCLUDING CONSIDERATION OF ADDITIONAL HOUSING ALLOCATIONS.

- 3.50 The next table and graph provides a breakdown on performance. There will be a need to consider performance at Review Stage i.e. before Sept 2024 Year 10.
- 3.51 Performance to date is from the base date of 2015 and shows the overall cumulative performance is above the target as at April 22.

	Year	Annual Target	Cumulative Target	Trigger 1: 10% Below At Review	Trigger 2: 25% Below at Review	Completed	Cumulative Completions	Cumulative Performance	Action	Overview
Year 1	2015-2016	23	23	21	17	1	1	4%	Continue Monitoring	
Year 2	2016-2017	23	46	41	35	46	47	102%	Continue Monitoring	
Year 3	2017-2018	23	69	62	52	3	50	72%	Continue Monitoring	
Year 4	2018 -2019	23	92	83	69	14	64	70%	Continue Monitoring	
Year 5	2019-2020	23	115	104	86	25	89	77%	Continue Monitoring	
Year 6	2020-2021	23	138	124	104	39	128	93%	Continue Monitoring	
Year 7	2021-2022	23	161	145	121	38	166	103%	Continue Monitoring	



3.52 Affordable housing completions will continue to be monitored to the review period 2024. Sites are also mapped on our website.²⁵

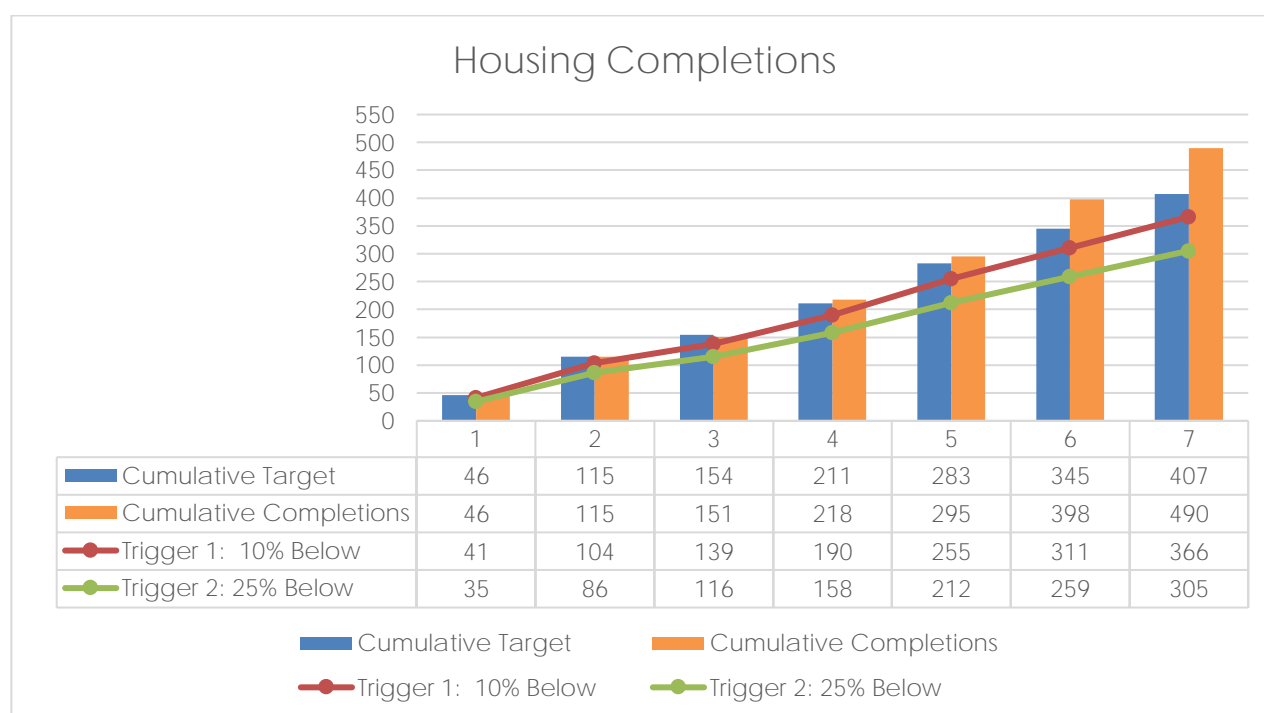
INDICATOR 24
POLICY 46, POLICY 47, POLICY 50 THE NUMBER OF NET ADDITIONAL DWELLINGS BUILT ²⁶
TARGET: 960 DWELLINGS BUILT OVER THE PLAN PERIOD AT AN AVERAGE RATE OF 62 DWELLINGS PER ANNUM (FROM APRIL 2019) OVER THE PLAN PERIOD (AS INDICATED IN THE HOUSING TRAJECTORY – SEE TABLE BELOW)
TRIGGER: COMPLETIONS 10% BELOW THE TARGET EXPECTED BY THE FORMAL PLAN REVIEW PERIOD (REVIEW TRIGGER IS BEFORE SEPTEMBER 2024 YEAR 4 OF THE ADOPTED PLAN). UNDERTAKE RESEARCH TO ESTABLISH REASONS AND DEPENDENT ON FINDINGS CONSIDER WHETHER ACTIONS ARE NECESSARY TO INCREASE SUPPLY. COMPLETIONS 25% LESS THAN TARGETS – DETERMINE ACTIONS TO INCREASE SUPPLY OF HOUSING TO DELIVER AFFORDABLE HOUSING, INCLUDING CONSIDERATION OF ADDITIONAL HOUSING ALLOCATIONS AND A REVIEW OF CENTRE BOUNDARIES.

²⁵ [Local Development Plan Annual Monitoring \(arcgis.com\)](https://arcgis.com)

²⁶ Please note that the reference to 960 dwellings completed during the Plan Period includes a target of 362 affordable units – See Policy 46 Housing (Strategy Policy).

3.53 Housing completion rates overall are above the cumulative target at this point – April 2022. Formal review stage will allow for a conclusion to be reached regarding whether either Trigger has been reached and what the next steps might be. Sites are also mapped on our website.²⁷

	Year	Annual Target	Cumulative Target	Trigger 1: 10% Below	Trigger 2: 25% Below	Annual Completions	Cumulative Completions	Annual Performance	Cumulative Performance	Action	Overview
Year 1	2015-2016	46	46	41	35	46	46	100%	100%	Continue Monitoring	●
Year 2	2016-2017	69	115	104	86	69	115	100%	100%	Continue Monitoring	●
Year 3	2017-2018	39	154	139	116	36	151	92%	98%	Continue Monitoring	●
Year 4	2018-2019	57	211	190	158	67	218	118%	103%	Continue Monitoring	●
Year 5	2019-2020	72	283	255	212	77	295	107%	104%	Continue Monitoring	●
Year 6	2020-2021	62	345	311	259	103	398	166%	115%	Continue Monitoring	●
Year 7	2021-2022	62	407	366	305	92	490	148%	120%	Continue Monitoring	●

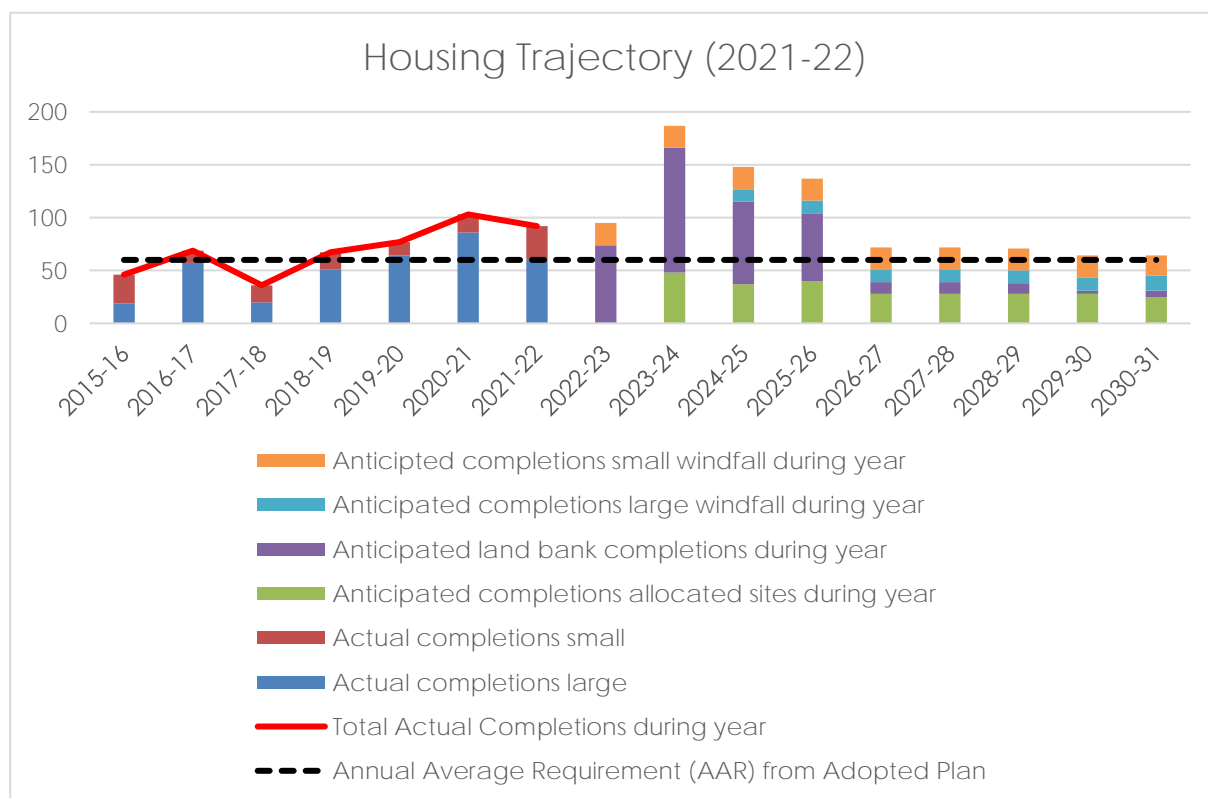


3.54 In March 2020, the Welsh Government published the Development Plans Manual (Edition 3), which introduced a requirement for this Authority's Annual Monitoring Report to include an up-to-date Housing Trajectory and to compare the actual delivery of housing against the AAR (Annual Average Requirement).

3.55 The housing requirement for the Pembrokeshire Coast National Park Local Development Plan 2 is 960 units and is illustrated on an annual basis as a black dotted








²⁷ [Local Development Plan Annual Monitoring \(arcgis.com\)](https://arcgis.com)

line in the graph below, an expectation of delivering 60 units per annum. To date the cumulative performance is better than anticipated.




Actual and Forecasted Annual Housing Completions compared against the AAR


LDP Year	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31
Actual completions large	19	57	20	51	64	86	60									
Actual completions small	27	12	16	16	13	17	32									
Anticipated completions allocated sites during year								0	48	37	40	28	28	28	28	25
Anticipated land bank completions during year								74	118	78	64	11	11	10	3	6
Anticipated completions large windfall during year								0	0	12	12	12	12	12	12	14
Anticipated completions small windfall during year								21	21	21	21	21	21	21	21	19
Total Actual Completions during year	46	69	36	67	77	103	92									
Anticipated Annual Build Rate (AABR) from Adopted Plan								95	187	148	137	72	72	71	64	64
Annual Average Requirement (AAR) from Adopted Plan	60	60	60	60	60	60	60	60	60	60	60	60	60	60	60	60


	Annual Target AAR	Actual Annual Completions	Plus/Minus Units	Plus/Minus %	Cumulative Target (AAR)	Cumulative Completions	Plus/Minus	Plus/Minus %	Action	Overview
2015-2016	60	46	-14	-23%	60	46	-14	-23%	Continue Monitoring	
2016-2017	60	69	9	15%	120	115	-5	-4%	Continue Monitoring	
2017-2018	60	36	-24	-40%	180	151	-29	-16%	Continue Monitoring	
2018 -2019	60	67	7	12%	240	218	-22	-9%	Continue Monitoring	
2019-2020	60	77	17	28%	300	295	-5	-2%	Continue Monitoring	
2020-2021	60	103	43	72%	360	398	38	11%	Continue Monitoring	
2021-2022	60	92	32	53%	420	490	70	17%	Continue Monitoring	


3.56 More information on the phasing and delivery of sites for 2022 is provided at the end of the Annual Monitoring Report.


INDICATOR 25
POLICY 47, POLICY 48 HOUSE PRICES, BUILD COSTS, AFFORDABLE RENTS
TARGET: TARGETS FOR AFFORDABLE HOUSING DELIVERY FOR EACH LOCAL MARKET HOUSING AREA ARE MAINTAINED
<p>THE FOLLOWING KEY INDICATORS WILL BE MONITORED:</p> <p>A) HOUSE PRICES – DATA WHICH INCLUDES SECOND HAND AS WELL AS NEW PROPERTIES AND PROVIDES A ROBUST INDICATOR OF PRICE TRENDS.</p> <p>B) BUILD COSTS – PEMBROKESHIRE BENCHMARK BUILD COSTS AND RELEVANT BCIS INDEX; AND,</p> <p>C) AFFORDABLE RENTS – LOCAL HOUSING ALLOWANCE DATA.</p> <p>TRIGGER: THE AUTHORITY WILL CONSIDER IF THERE IS A 10% CHANGE (PLUS OR MINUS) IN ANY ONE INDICATOR SUSTAINED OVER A 12 MONTH PERIOD OR IF</p> <p>A) THERE IS A PLUS OR MINUS CHANGE OF BETWEEN 5-9% IN ANY TWO INDICATORS SUSTAINED OVER A 12 MONTH PERIOD; OR,</p> <p>B) THERE IS LESS THAN 10% CHANGE IN INDICATOR(S) BUT CHANGE IS BEING SUSTAINED OR IF EVIDENCE INDICATES THAT SUSTAINED CHANGE HAS OCCURRED IN OTHER DEVELOPMENT COSTS E.G. FINANCE COSTS, DEVELOPER RETURN REQUIRED.</p> <p>THE AUTHORITY WILL CONSIDER IF CHANGES ARE NEEDED AND WHETHER THIS WOULD REQUIRE A SELECTIVE REVIEW IN ADVANCE OF THE 4-YEARLY FORMAL REQUIREMENT.</p>

Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	(1) 10% change plus or minus. (2) Or 5-9% change in 2 indicators (3) Or less than 10% but change is sustained.	Targets for affordable housing deliver for each local market housing area are maintained.	Build Cost Information Service shows an increase in cost of 9.4%. August 2021 to 2022 for Pembrokeshire. House prices Principality Building Society report July 2022 shows circa 9.9% increase in the year for Pembrokeshire. Nationwide and the Halifax house price change reports show higher increases (circa 13/14%).	Continue Monitoring	Performance remains below the Trigger point 1. Performance has reached Trigger point 2. The increase in build costs are less than the higher house prices achieved. This would indicate that the affordable housing requirements in each local market housing area can be maintained.	

INDICATOR 26						
POLICY 53 GYPSY AND TRAVELLER AND SHOW PEOPLE SITES						
TARGET: AUTHORITY DECISIONS ARE CONSISTENT WITH POLICY						
TRIGGER: 1 OR MORE APPLICATIONS ARE APPROVED CONTRARY TO RECOMMENDATION						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	1	0	0	Continue Monitoring	Performance remains below the Trigger point	








INDICATOR 27						
POLICY 51 HOUSING DENSITY						
TARGET: 30 PER HECTARE TARGET IN THE PLAN'S CENTRES ACHIEVED.						
TRIGGER: 2 OR MORE HOUSING DEVELOPMENTS NOT ACHIEVING 30 DWELLINGS TO THE HECTARE UNLESS AN ALTERNATIVE DENSITY IS JUSTIFIED UNDER POLICY 51						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	2	0	0	Continue Monitoring	Performance remains below the Trigger point	

INDICATOR 28						
POLICY 52 MIX OF HOUSING						
TARGET: DECISIONS CONSISTENT WITH POLICY						
TRIGGER: 2 OR MORE HOUSING DEVELOPMENTS APPROVED CONTRARY TO POLICY 52.						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	2	0	0	Continue Monitoring	Performance remains below the Trigger point	

INDICATOR 29						
POLICY 2 TO POLICY 7 PLAN'S CENTRES						
TARGET: 90% OF HOUSING COMPLETIONS ARE FOCUSED IN THE PLAN'S CENTRES.						
TRIGGER: 20 % OF COMPLETIONS ARE IN THE COUNTRYSIDE BY THE FORMAL PLAN REVIEW PERIOD. UNDERTAKE RESEARCH TO ESTABLISH REASONS AND DEPENDENT ON FINDINGS CONSIDER WHETHER ACTIONS ARE NECESSARY TO THE SPATIAL STRATEGY.						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	20% of completions in the Countryside	90% of completions are in Plan's Centres	Just under 20%	Continue Monitoring	Performance remains below the Trigger point. See commentary below.	

3.57 The figures for 2021-22 show that the number of completions in the Countryside has increased to just under 20% of overall completions (17 dwellings). The strategy to control development in the countryside has not been undermined however, as the completions constitute legacy infill and rounding off opportunities granted under Local Development Plan 1, the removal of accessibility requirements regarding the conversion of appropriate buildings in the countryside under Local Development Plan 2 which has resulted in allowing full residential in appropriate buildings and also the completion of dwellings in locations that were in Rural Centres under Local Development Plan 1 but are now regarded as countryside under Local Development Plan 2.

INDICATOR 30					
POLICY 52 TENURE OF AFFORDABLE HOUSING					
TARGET: 80% OF AFFORDABLE HOUSES PERMITTED ARE AFFORDABLE RENTED PROPERTIES					
TRIGGER: AN ANNUAL REVIEW OF ALL PLANNING PERMISSIONS GRANTED IN THAT YEAR SHOW THAT THE AFFORDABLE HOUSING ELEMENT INCLUDES LESS THAN 75% AFFORDABLE RENTED PROPERTIES. UNDERTAKE RESEARCH TO ESTABLISH REASONS AND DEPENDENT ON FINDINGS CONSIDER WHETHER ACTIONS ARE NECESSARY TO INCREASE SUPPLY.					

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

2F COMMUNITY FACILITIES, RETAILING AND TRANSPORT


KEY OUTCOMES

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


CONTEXT


- 3.58 Retailing: Covid-19 had a significant impact on retailing and town centres. To breathe new life into town centres, the Welsh Government has adopted a **'Town Centre First' approach in Future Wales 2040**. In addition, the newly established Retail Forum launched a Retail Strategy in June 2022²⁸ to develop a shared vision for a successful, sustainable and resilient retail sector that offers fair, secure and rewarding work. Welsh High Street vacancy rates were 16.9% in the first quarter of 2022, a reduction from 17.4% in the last quarter of 2021. **These vacancy rates are not reflected in the National Park's Retail Centres**, all of which have vacancy rates well below 10%. See Indicator 34 below.
- 3.59 Community Infrastructure Levy: There are no plans at present to pursue a Community Infrastructure Levy in Pembrokeshire.


POLICY PERFORMANCE

INDICATOR 31						
POLICY 54 COMMUNITY FACILITIES & INFRASTRUCTURE REQUIREMENTS						
TARGET: AUTHORITY DECISIONS ARE CONSISTENT WITH POLICY						
TRIGGER: APPROVAL OF 1 OR MORE PLANNING APPLICATIONS CONTRARY TO POLICY 54 IN ANY ONE YEAR						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	1	0	0	Continue Monitoring	Performance remains below the Trigger point	

²⁸ [A shared strategic vision for the retail sector | GOV.WALES](#)


INDICATOR 32						
POLICY 55 PLANNING OBLIGATIONS						
TARGET: S106 AGREEMENTS SECURED IN LINE WITH GUIDANCE						
TRIGGER: APPROVAL OF 2 OR MORE PLANNING APPLICATIONS CONTRARY TO RECOMMENDATION						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	1	0	0	Continue Monitoring	Performance remains below the Trigger point	

INDICATOR 33						
POLICY 56, 57 RETAIL HIERARCHY						
TARGET: AUTHORITY DECISIONS ARE CONSISTENT WITH POLICY						
TRIGGER: 1 OR MORE DEVELOPMENTS APPROVED CONTRARY TO RECOMMENDATION IN ANY ONE YEAR FOR EITHER POLICY 56 OR POLICY 57						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	1	0	0	Continue Monitoring	Performance remains below the Trigger point	

INDICATOR 34						
POLICY 56 VACANT RETAIL FLOOR SPACE						
TARGET: NO GREATER THAN 10%						
TRIGGER: GREATER THAN 10% VACANT A USE CLASS FLOOR SPACE WITHIN RETAIL CENTRES FOR 2 CONSECUTIVE YEARS						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	Greater than 10% for 2 consecutive years	Less than 10%	Overall vacant floorspace = 5.7%	Continue Monitoring	Performance remains below the Trigger point	

Vacant A Use Class Floor Space in National Park Retail Centres

YEAR	OVERALL	TENBY	ST DAVIDS	NEWPORT	SAUNDERSFOOT
2021-22	5.7%	8.7%	3.2%	0%	0.7%

INDICATOR 35						
POLICY 59 TRANSPORT						
TARGET: 0 APPLICATIONS CONTRARY TO RECOMMENDATION						
TRIGGER: 1 OR MORE APPLICATIONS APPROVED CONTRARY TO RECOMMENDATION						
Year	Trigger	Target	Performance	Action	Analysis	Overview
2021-2022	1	0	0	Continue Monitoring	Performance remains below the Trigger point	






SUPPLEMENTARY PLANNING GUIDANCE

INDICATOR 37









KEY SUPPLEMENTARY PLANNING GUIDANCE

TARGET: TO ADOPT KEY SUPPLEMENTARY PLANNING GUIDANCE WITHIN 1 YEAR OF THE **PLAN'S ADOPTION** (SEPT 21) = 6 GUIDANCE DOCUMENTS.


TRIGGER: 1 OR MORE GUIDANCE DOCUMENTS NOT ADOPTED

Status	SEPT 21	Count ²⁹
Adopted		2
Consultation Underway		0
Being drafted/redrafted/		2
Interim/rolled over		4
Later/Stalled		1

All key guidance was in operation as at October 22 either as a rolled over guidance or as adopted following public consultation. The table below explains the timetable going forward. A commentary on the full suite of Guidance can be found in Appendix 7

Title	Position as at September 2021	Status
Affordable Housing	Interim Supplementary Planning Guidance Local Development Plan 2 – September 2020 (with PCC) Preparing joint with PCC for LDP2 alongside an Affordable Housing Strategy for Pembrokeshire.	 
Caravan, Camping and Chalet	Adopted May 2021	
Landscape	Interim Supplementary Planning Guidance Local Development Plan 2 – September 2020 Implementing Interim Guidance until LANDMAP updates received.	 
Planning Obligations	Interim Supplementary Planning Guidance Local Development Plan 2 – September 2020 (with PCC) Review will be led by Pembrokeshire County Council	
Renewable Energy	Adopted May 2021	
Seascape Character	Interim Supplementary Planning Guidance Local Development Plan 2 – September 2020	

²⁹ Guidance may be counted under more than one category

Title	Position as at September 2021	Status
	Preparing an update with PCC. Reporting draft for consultation NPA October 22.	

EFFECTIVENESS OF POLICY AND GUIDANCE AT APPEAL

3.60 In the period April 2021 to March 2022 there were seven appeal decisions against refusals for planning permission. Four of these were allowed, two were dismissed and one was partially allowed / partially dismissed.

Application Details	Reasons for Refusal	Appeal Decision ³⁰
NP/19/0522/FUL – Hybrid application: Outline for 14 Affordable Houses and full change of use of land from 85 tents to 85 static caravans with associated landscaping, distributor roads and new sewage pumping station	Refused by Development Management Committee: Policy 60 Impacts of Traffic Adverse impact on immediate and wider landscape and therefore contrary to Policies 8 (Special Qualities, 14 (Conservation of the National Park), 38 (Visitor Economy), 40 (Self-Catering Development) and 41 (Caravan, Camping and Chalet Development) and an impact on privacy and amenity therefore contrary to Policies 14 and 30 (Amenity)	APP/L9503/A/21/3267928 Allowed (Costs also awarded) 28/06/2021 Inspector considered there would be no adverse effect on highway safety and therefore complied with Policy 60. No increase in pitch numbers and subject to appropriate conditions would result in no conflict with Policies 8 or 14 and would comply with Policies 38 and 41. Policy 40 was considered irrelevant as self-catering development does not include caravans. Inspector also concluded there was no conflict with Policy 30.
NP/19/0522/FUL: The Inspector's decision did not raise any issues with any of the Local Development Plan Policies that would require a review.		
NP/20/0279/FUL – Parking bay, new doorway, additional windows and rooflights and partial change of use to residential	Refused by Development Management Committee: Rooflights would result in overlooking contrary to Policy 30 (Amenity). (Doorway granted retrospective permission NP/20/0437/FUL on 05/02/2021)	APP/L9503/A/21/3269848 Allowed (Costs also awarded) 23/07/2021 Rooflights would be elevated well above floor level and therefore no practical opportunity for building occupiers to look down to private amenity space of neighbouring properties therefore no

³⁰ [Search for a case - Planning Casework \(gov.wales\)](https://www.gov.uk/search-for-a-case-planning-casework)

Application Details	Reasons for Refusal	Appeal Decision ³⁰
conflict with Policy 30.		
NP/20/0279/FUL: The appeal decision does not dispute the appropriateness or the effectiveness of Policy 30. There is no evidence to suggest the Policy would require a review.		
NP/20/0435/FUL – Proposed rear and side extension along with remodelling of interior. Demolition of existing garage and redevelopment as two double garages with a one bedroom apartment over.	Proposal was considered to adversely affect the special qualities of the National Park and to be unsuitable development within the context of the setting, the centre, the Conservation Area, the surrounding properties of historic character and the wider landscape. Contrary to Policies 1 (National Park Purposes and Duty), 6(Rural centres), 8(Special Qualities), 11(Nationally Protected Sites and Species), 14(Conservation of the Pembrokeshire Coast National Park), 29(Sustainable Design) and 30(Amenity).	APP/L9503/A/21/3275403 Dismissed 06/08/2021 Inspector concluded that there was no conflict with Policy 11, but agreed that the proposal would not preserve or enhance the character or appearance of the Conservation Area and contrary to Policies 1,6,8,14 and 29.
NP/20/0279/FUL: The dismissal of the appeal citing these policies shows that they are performing effectively.		
NP/20/0230/FUL – a One Planet Development consisting of Cabin, Greenhouse, Compost Toilet, Barn with Lean to Goose House and PV array.	Proposal was considered to cause harm to the special qualities of the National Park and in particular degrade the visual amenity and experience currently enjoyed by users of the public footpath which runs through the site and is contrary to Policies 1 (National Park Purposes and Duty), 7 (Countryside), 8 (Special Qualities), 14 (Conservation of the Pembrokeshire Coast National Park) and 29 (Sustainable Design).	APP/L9503/A/21/3271493 Allowed 09/12/2021 The Inspector considered that the site cannot be viewed by walkers on the footpath approaching from the southeast until they actually enter the site and that users would not be significantly harmed in their quality of experience and enjoyment of the special qualities of the National Park. There is therefore no conflict with Policies 1, 8 or 14. Proposed buildings would comply with Policy 29.

Application Details	Reasons for Refusal	Appeal Decision ³⁰
NP/20/0230/FUL: The Inspector considered that there would be no significant harm to the special qualities of the National Park. The appeal decision does not dispute the appropriateness or the effectiveness of the policies. There is no evidence to suggest the policies would require a review.		
NP/20/0421/OUT – Demolition of existing industrial buildings and erection of two dwellings.	The proposed density of the development on a rare brownfield site does not accord with the requirements of Policy 51 (Housing Densities)	APP/L9503/A/21/3280831 Dismissed 23/12/2021 The Inspector considered that it has not been sufficiently demonstrated that the proposed development would make optimal use of a brownfield site within a settlement, thereby conflicting with Policy 51.
NP/20/0421/OUT: The dismissal of the appeal citing Policy 51 shows that the policy is performing effectively.		
NP/18/0666/FUL – Subdivision of host dwelling to include linked holiday let unit without complying with condition 6 – removal of static caravan from the site.	Condition 6 of the planning permission required the removal of the existing caravan within 6 months of the grant of planning permission.	APP/L9503/A/21/3281670 Allowed 07/01/2022 Condition is not reasonable or necessary and its removal would be consistent with Policies 1, 8, 14 and 30.
NP/18/0666/FUL: The appeal decision does not dispute the appropriateness or the effectiveness of the policies. There is no evidence to suggest the policies would require a review.		
NP/21/0404/ADV - Erection of 3 no. high level building mounted halo illuminated individual letter and roundel signs, 1 no. halo illuminated fascia sign and 1 no. non-illuminated directional sign.	Planning permission granted for the display of the advertisements. Condition 3 stated that the permitted signs shall be non-illuminated in perpetuity in order to protect the visual amenity and the special qualities of the National Park and therefore compliance with Policies 1 (National Park Purposes and Duty, 8 (Special Qualities), 9 (Light Pollution), 14 (Conservation of the Pembrokeshire Coast National Park), 29 (Sustainable Design and 30 (Amenity)	CAS-01587-R4N0P1 Dismissed 22/03/2022 (relating to east- and west-facing signs). The Inspector considered that the night-time illuminated east and west facing signs would blight and materially encroach on the remote and tranquil night time character and cause material harm to the National Park's natural beauty and therefore conflict with Policies 1, 8,

Application Details	Reasons for Refusal	Appeal Decision ³⁰
		<p>9, 14, 29 and 30.</p> <p>Allowed (relating to south-facing signs)</p> <p>South-facing signs are not prominent from the surrounding countryside and illumination would not cause visual harm.</p>
NP/21/0404/ADV: The dismissal of the appeal citing the above policies shows that they are performing effectively.		

4. SUSTAINABILITY APPRAISAL MONITORING

SUSTAINABILITY OBJECTIVE PROGRESS

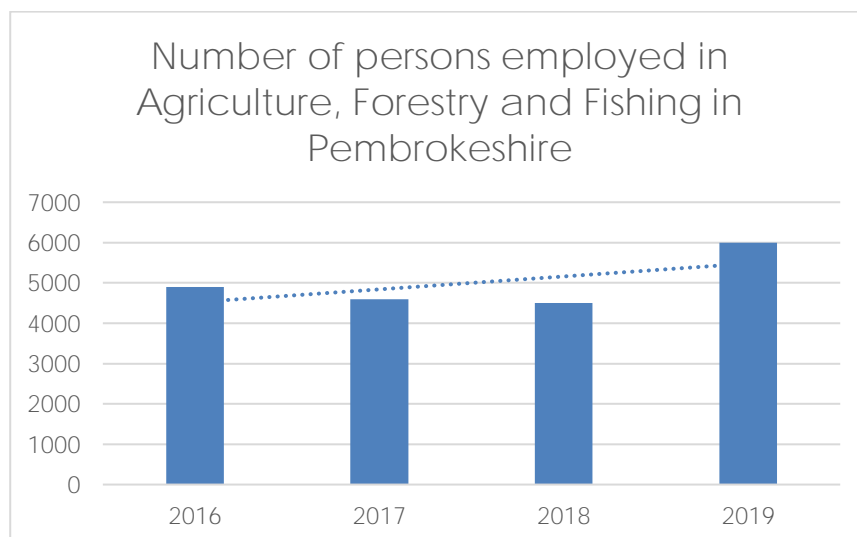
SUSTAINABILITY OBJECTIVE 1

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

COMMENTARY:

Figures for work place employment by industry and areas from Stats Wales provide a reasonable indicator as to the health of the agriculture and forestry sectors in the County. Current data indicates a decline in employment in the agriculture, forestry and fishing between 2016 and 2018, followed by a sharp rise in employment in these sectors in 2019. Policy on agricultural diversification within the Local Development Plan and national planning policy on enterprise dwellings may help to maintain these figures.

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



SUSTAINABILITY OBJECTIVE 2

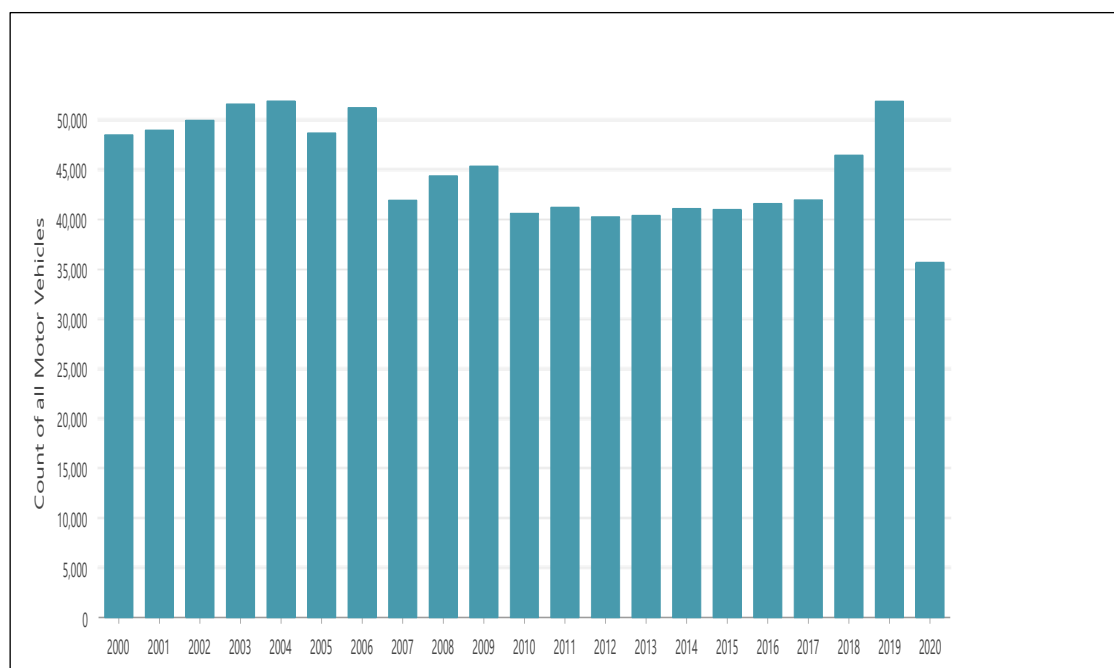
Locate developments so as to minimise the demand for travel, especially by private car

COMMENTARY:

Traffic counts from the Department for Transport for survey locations within the National Park show that between 2010 and 2017, traffic levels remained much the same. However, beyond 2017 (excluding 2020, which is the lowest value in the range due to the COVID-19 pandemic) indications are that traffic levels may have been returning to the levels similar to those experienced between 2000 and 2006. To conclude, at present, outliers within the data make it difficult to forecast a trend, future releases will be used to monitor the situation. Contributions to this objective by the Local Development Plan arise, largely, through the maintenance or improvement of community facilities, and by restricting development in areas where there are low levels of community infrastructure.

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

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



SUSTAINABILITY OBJECTIVE 3

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

COMMENTARY:

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

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

Performance against Indicator 4 shows that one application has been approved contrary to officer recommendation during this monitoring period. The nature of the contrary approval concerns camping and caravanning development in an inappropriate location.

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

CONCLUSION: Given that this is the first year of monitoring it is too early to draw conclusions. However, the approval of a planning application contrary to policy 8 is cause for concern.

Year	Action	Analysis	Overview
2021- 2022	Further investigation/Research required	Performance here is of concern as the special qualities are core to the National Park designation.	


SUSTAINABILITY OBJECTIVE 4

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

COMMENTARY:

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

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

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

SUSTAINABILITY OBJECTIVE 5

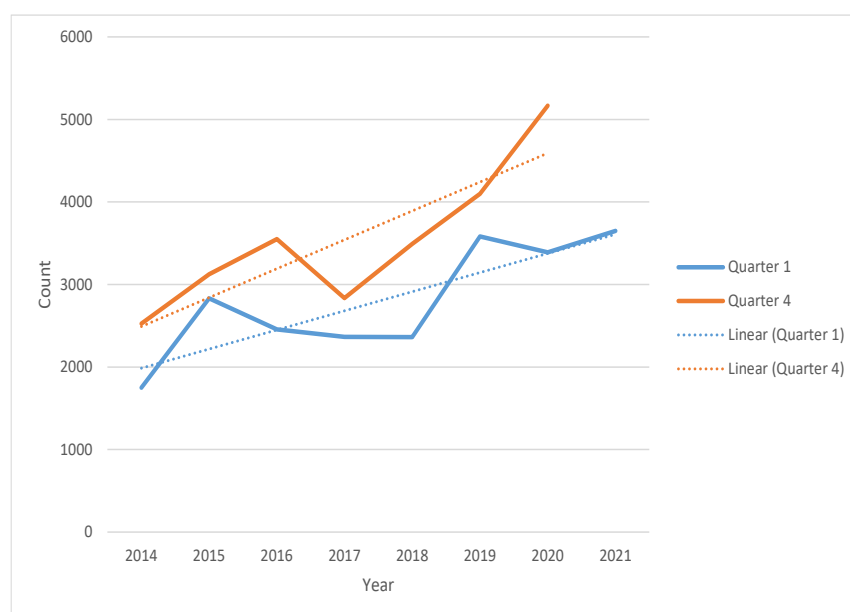
Increase the number of visitors using the National Park outside the peak visitor season.

COMMENTARY:


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


Approvals for self-catering accommodation since adoption of the Plan may help meet the aim to improve the suitability of accommodation for year round use. During this monitoring period four applications for the construction or conversion of properties to holiday lets have been approved.

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

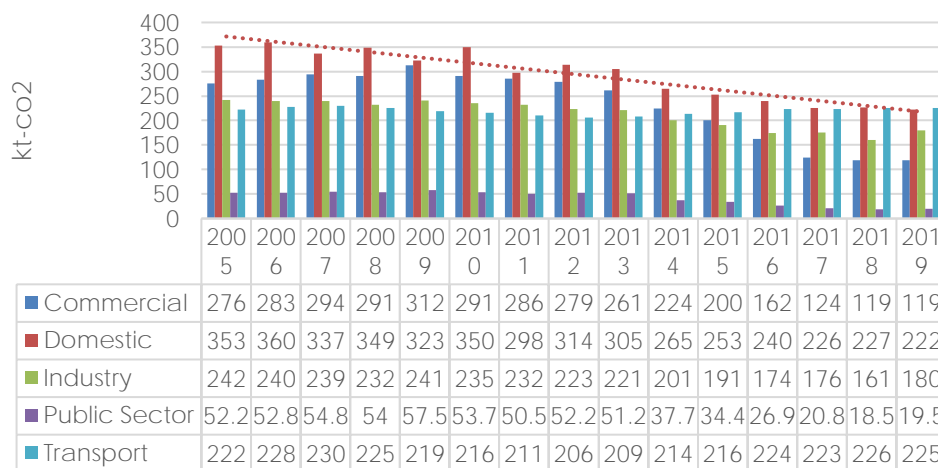


Footpath counters for the inland network in the National Park indicate a trend of increase in use outside of peak season (Q1&Q2) over the last seven years. The jump in Q4 use in 2020 is likely to be due to the COVID-19 Pandemic.

SUSTAINABILITY OBJECTIVE 6			
Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.			
<p>COMMENTARY:</p> <p>The Local Development Plan will contribute towards this objective primarily by not adding to the amount of infrastructure at risk from fluvial/coastal flooding. Performance against indicator 15 (Policy 34) shows that one application was permitted in a C2 flood zone during this monitoring period (see page 20 for details).</p> <p>LDP policies 35-37 designate "Coastal Risk Management Areas" and make allowances for the relocation and replacement of homes and community facilities, helping to enable the coastal communities in the National Park adapt to the effects of climate change.</p>			
Year	Action	Analysis	Overview
2021- 2022	Further investigation/Research required	Performance here is of concern as the special qualities are core to the National Park designation.	

SUSTAINABILITY OBJECTIVE 7			
Reduce factors contributing to climate change.			
<p>COMMENTARY:</p> <p>The most recent Local Authority estimates by the Department for Energy and Climate (2005-2019) show that the largest sources of carbon, within the scope of influence for Local Authorities, for Pembrokeshire have historically been domestic, commercial, industry and transport. Since 2016 the composition has shifted with domestic and transport being the primary sources in the County at roughly equal outputs. Also from 2016 emissions have plateaued showing no further significant increases or decreases.</p> <p>The Local Development Plan contributes to this SA Objective by ensuring that new developments are efficient in their use of energy and materials; by approving appropriate renewable energy schemes, and by promoting the retention or expansion of community facilities.</p> <p>Indicators 11 (Policy 29 Sustainable Design), 12 (Renewable Energy schemes permitted), 13 (Renewable Energy Capacity) and 31 (Policy 54 Community Facilities and Infrastructure Requirements) all show good performance and no decisions contrary to their related policies for this monitoring period.</p>			
Year	Action	Analysis	Overview
2021- 2022	Continue Monitoring	Performance remains acceptable.	

2005 to 2019 local authority carbon dioxide (CO2) emissions: Pembrokeshire



Emissions source: [2005 to 2019 local authority carbon dioxide \(CO2\) emissions dataset \(revised\) - Datasets - Integrated Data Service \(gss-data.org.uk\)](#)

SUSTAINABILITY OBJECTIVE 8


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

COMMENTARY:

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

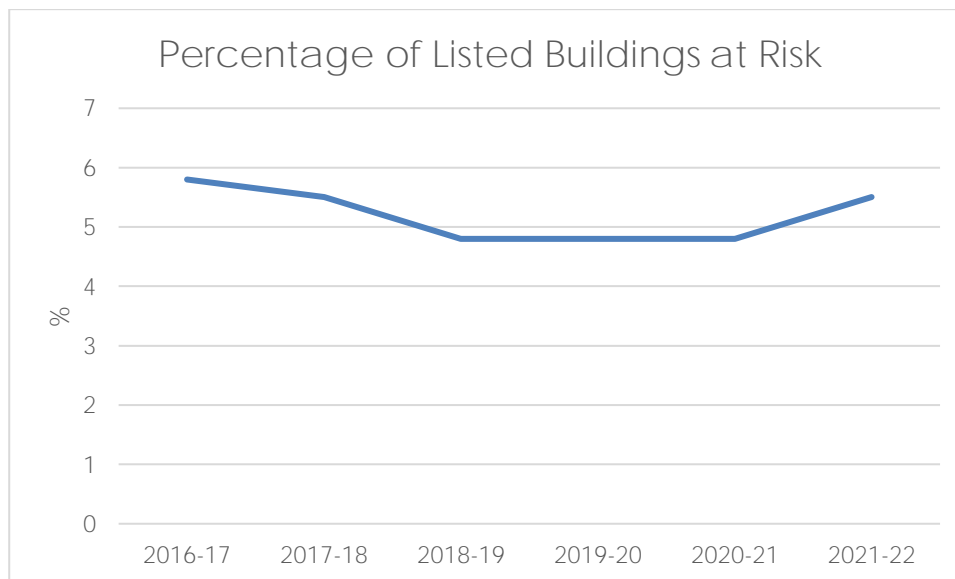
Indicator 23 (Affordable Housing, Policy 52) shows good progress towards the LDP targets for affordable housing.

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

SUSTAINABILITY OBJECTIVE 9			
Encourage access for all to the National Park, reflecting the social mix of society.			
COMMENTARY:			
Contributions to this SA Objective from the Local Development Plan arise mostly through the provision of affordable housing, and through the the provision of range of holiday accomodation types that suit all budgets.			
Indicators 23 and 30 indicate reasonable progress towards towards the LDP targets for housing.			
Year	Action	Analysis	Overview
2021- 2022	Continue Monitoring	Performance remains acceptable.	

SUSTAINABILITY OBJECTIVE 10
<p>Maintain the cultural distinctiveness of communities.</p> <p>This sustainability objective covers the breadth of aspects that contribute to the unique character and cultural distinctiveness of the National Park.</p>
<p>COMMENTARY:</p> <p>This sustainability objective covers the breadth of aspects that contribute to the unique character and cultural distinctiveness of the national park.</p> <p>Within the context of the Local Development Plan, achievements towards this objective will be threefold. Firstly the Local Development Plan will be able to contribute towards the objective by helping to ensure that people who grew up in the National Park are able to have the opportunity to continue living here once they are adults by sustaining local communities and enabling access to employment (see SA Objective 8).</p> <p>Secondly, the Local Development Plan will be able to contribute to the objective by helping to maintain and enhance culturally significant built environment and natural environment features.</p> <p>Thirdly, by helping to protect the Welsh language.</p> <p>In terms of maintaining listed buildings less than 10% (5.5%) are identified as being at any degree of risk. There is also potential for Listed Buildings to have a change of use/conversion. Between the 1st April 2021 and 31st March 2022 six applications for the change of use or conversion were approved.</p> <p>Indicator 5 (Policy 13 Welsh Language) indicates that there have been no decisions made contrary to Welsh Language policy in this monitoring period. Indicator 23 (Policies 47-49) shows that completions of affordable housing units in this monitoring period have exceeded the target. The provision of affordable housing contributes to this SA Objective by helping people to remain in their communities.</p>

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




SUSTAINABILITY OBJECTIVE 11

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

COMMENTARY:

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

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

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



SUSTAINABILITY OBJECTIVE 12

Reduce the negative impacts of waste.

COMMENTARY

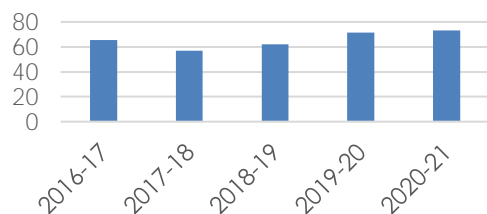
Policies 27 and 28 make allowances for waste management and composting facilities to be created that benefit communities in the national park subject to the location being appropriate. No applications contrary to these policies (see indicator 10) have been approved during this monitoring period.

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

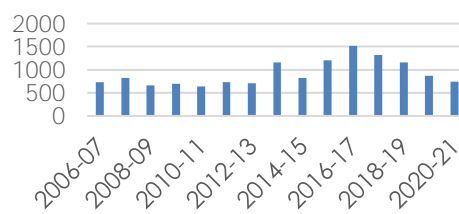
Following the introduction of the new household recycling and waste collection service in November 2019, Pembrokeshire is now Wales' top recycler.

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

Percentage of Waste Reused/Recycled (Statutory Target) Pembrokeshire by...



Total Recorded Incidents of Fly-tipping Pembrokeshire



SUSTAINABILITY OBJECTIVE 13


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

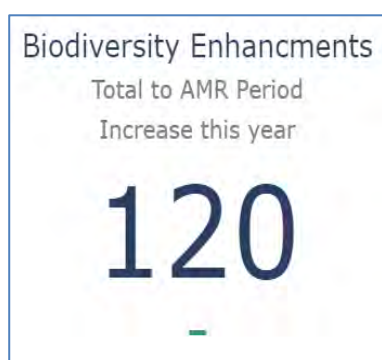
COMMENTARY:

In terms of facilities available that qualify Centres as Rural Centres there has been a loss of qualifying facilities in two split Centres outside the Authority's planning jurisdiction. The extent of the settlements in the Authority's jurisdiction is not significant in scale. Continue monitoring to appraise at review stage. In terms of the larger Centres the range of facilities required to qualify these Centres as Tier 1 and Tier 2 Centres remain. Changes in the main findings are:

- an increase in the number of primary schools in Tenby
- a small reduction in the number of pubs in Tenby and Saundersfoot.

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

SUSTAINABILITY OBJECTIVE 14			
Maintain and enhance biodiversity both within and outside designated sites			
<p>COMMENTARY:</p> <p>Contributions to this SA objective from the Local Development Plan come through the Plan's Biodiversity policies, and through biodiversity enhancements to developments included as conditions of planning permission.</p> <p>120 planning applications either included biodiversity enhancements or biodiversity enhancements were requested as a condition of permission.</p>			
Year	Action	Analysis	Overview
2021- 2022	Continue Monitoring	Performance remains acceptable.	



SUSTAINABILITY OBJECTIVE 15

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


COMMENTARY:

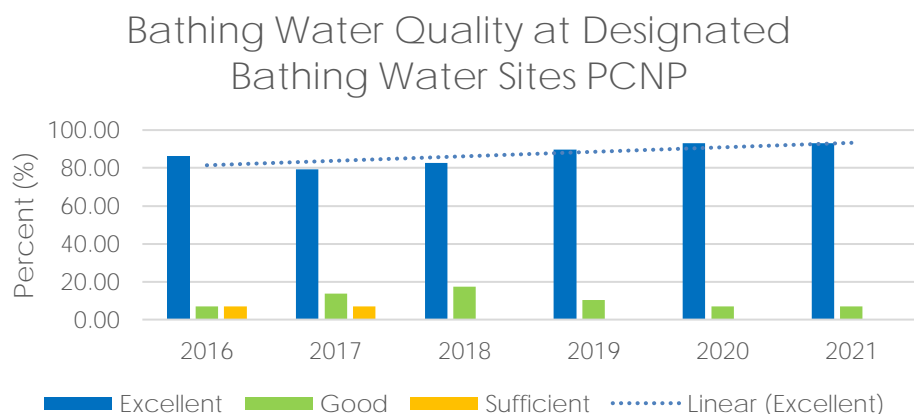
Phosphorous in Rivers: Planning applications affecting phosphorus sensitive river Special Areas of Conservation³¹

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

Information on Marine SACs is also awaited.

Bathing water quality continues to improve.

Year	Action	Analysis	Overview
2021- 2022	Continue Monitoring	The strategy of the Plan is not affected by current issues with phosphorous elsewhere in Pembrokeshire.	



³¹ [Natural Resources Wales / Advice to planning authorities for planning applications affecting phosphorus sensitive river Special Areas of Conservation](#)

ADDITIONAL CONTEXTUAL INDICATOR

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

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

Dealing with each in turn

The number of households with no usual resident 2011:

A breakdown is provided in the Authority's Background Paper for the Local Development Plan Examination on 'Principal Residence and/or local Connections'³² Policy using Census 2011 figures. The relevant extract is copied below for ease of reference. The first opportunity to have comparator information will be when the 2021 Census data is published.

HOUSEHOLDS WITH 'NO USUAL RESIDENT'³³:

DEFINITIONS:

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

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

(Ranked by percentage)

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

Table 10 No Usual Resident

Community	Percent no usual resident	Within the National Park?
Lamphey	48.2	Partly
Newport	37.3	In

³² <https://www.pembrokeshirecoast.wales/wp-content/uploads/2019/12/Exam111-HS1-AP10.pdf>

³³ A household space with no usual residents may still be used by short-term residents, visitors who were present on census night, or a combination of short-term residents and visitors. Vacant household spaces, and household spaces that are used as second addresses, are also classified in census results as 'household spaces with no usual residents'.

Community	Percent no usual resident	Within the National Park?
The Havens	35.5	Partly
Dale	33.3	In
Marloes & St Brides	31.9	In
Dinas Cross	29.5	In
Saundersfoot	28.6	In
Pencaer	28.4	Partly
St Mary Out Liberty	28.1	Partly
St Davids	26.9	In
Llanrhian	26.5	Partly
Nolton & Roch	26	Partly
Amroth	25.3	Partly
Solva	25.2	Partly

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

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

Community	Percentage of homes subject to the second homes council tax premium 2019 (25% or more highlighted)	Percentage of homes subject to the second homes council tax premium 2021(25% or more highlighted)	Percentage of homes subject to the second homes council tax premium 2022 (25% or more highlighted)
Caldey	26%	35%	30%
Dale	34%	32%	36%
Newport	26%	25%	25%
The Havens	29%	30%	31%

Caldey: There have been no housing completions in Caldey during this period. That can only mean that properties already built on the island have been re-categorised as second homes for the purposes of Council Tax and then re-categorised for 2022.

Dale shows a small percentage increase overall. No completions have been recorded for the Community Council area for the period 2019 to 2022.

There has been a small decline in the percentage shown as Second Homes in Newport between 2019 and 2022.

In the The Havens, where there has been an increase from 29% to 31% there have been completions of both market dwellings and affordable housing. Council Tax records relate to all the housing stock in the Community rather than just newly

completed dwellings so it is difficult to comment further. The increase in those properties paying the second home premium could possibly be as a result of the development of market dwellings but a direct link cannot be proven.

The provision of community facilities

In terms of facilities available that qualify Centres as Rural Centres there has been a loss of qualifying facilities in two split Centres outside the Authority's planning jurisdiction. The extent of the settlements in the Authority's jurisdiction is not significant in scale. There is a need to continue monitoring in order to appraise the situation at review stage. In terms of the larger Centres the range of facilities required to qualify these Centres as Tier 1 and Tier 2 Centres remain. The main findings are:

- an increase in the number of primary schools in Tenby
- a small reduction in the number of pubs in Tenby and Saundersfoot.

Schools and School Occupancy Levels

An update was provided by Pembrokeshire County Council in July 2022. In summary the Authority was advised that the commentary provided for the Local Development Plan Examination³⁴ (copied below for ease of reference) *'remains a true reflection of the current situation. Needless to say Covid may well change the situation, due to families choosing to move to Pembrokeshire from larger towns and cities, and thereby putting more pressure on school places in certain areas. In the case of St Dogmaels, however, we have anecdotal evidence to suggest that properties are being bought by older people, not necessarily second homes, thereby denying younger families and therefore reducing the local pupil population.'*

Additionally;

"We (Pembrokeshire County Council) will be undertaking a significant piece of work during the coming months with a view to producing a School Organisation Plan which will set out the broad aims and objectives in terms of school organisation for the coming 5 years. This will need to consider a number of issues including area population trends, forecast pupil numbers, surplus places and occupancy data..."

EXTRACT FROM THE LOCAL DEVELOPMENT PLAN 2 BACKGROUND PAPER ON 'PRINCIPAL RESIDENCE AND/OR LOCAL CONNECTIONS POLICY'

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

- The Authority contacted the Children and Schools Directorate at Pembrokeshire County Council and asked if there were any existing issues in the

³⁴ See page 62 (page 123 of the PDF) of Appendix 2 in the Authority's Background Paper on 'Principal Residence and/or local Connections Policy' <https://www.pembrokeshirecoast.wales/wp-content/uploads/2019/12/Exam111-HS1-AP10.pdf>

county, particularly those schools that have catchments within or partly within the National Park.

- The Authority has been advised that there are a number of schools which have catchments within the National Park area. A number of these have, and are likely to continue to have, sufficient spare places to be able to accommodate additional pupil yield from new housing, e.g. St Dogmael's CP, Ysgol Eglwysrw and Ysgol Llanychllwydog. However, there are other schools that have limited spare capacity and are likely to come under increased pressure from additional housing yield; such schools are Ysgol Penrhyn Dewi VA, Coastlands CP and Lamphey CP. It should be noted that in the case of schools such as Stepside CP, there is likely to be pressure arising from housing developments arising from both the National Park and County Council planning areas.

- In short it is not the case that all communities in the National Park are suffering from high numbers of empty school places, indeed some schools may come under pressure from new development within the Park during the plan period.
- Table 13 below, describes the relationship between the catchments of the primary school mentioned above and the communities in the National Park.

<i>School</i>	<i>National Park Communities (within or partly within catchment)</i>
Coastlands CP	Dale, Herbrandston, Marloes and St Brides, Milford Haven, St Ishmaels, The Havens, Walwyns Castle
Lamphey CP	Carew, Lamphey, Manorbier, Stackpole & Castlemartin
Saundersfoot CP	Amroth, Saundersfoot, St Mary Out Liberty
St Dogmael's CP	Nevern, St Dogmaels
Stepside CP	Amroth, Carew, St Mary Out Liberty
Ysgol Bro Ingli	Cwm Gwaun, Dinas Cross, Newport, Nevern
Ysgol Eglwysrw	Eglwysrw, Nevern
Ysgol Llanychllwydog	Cwm Gwaun, Eglwysrw, Nevern, Newport, Nevern, Puncheston
Ysgol Penrhyn Dewi	Brawdy, Haycastle, Llanrhian, Mathry, Nolton & Roch, Solva, St David's, The Havens

Conclusion: A review of the data overall shows that:

- The Census 2021 figure on dwellings with no usual resident is awaited so that a comparison can be drawn with the 2011 figures.
- With regard to properties paying Council Tax premium there has been a small decline in some communities. There has also been a small increase in some communities. The increase in those properties paying the second home premium could possibly be as a result of the development of market dwellings where such completions took place.
- With regard to community facilities there is no clear indication that there has been a deterioration in the range of facilities available in Centres.
- No change in the situation regarding schools and schools occupancy.

Since the receipt of the Inspector's Report for Local Development Plan 2 (2020) there has been significant debate and proposed changes in relation to second homes and holiday lets by the Welsh Government. The implications of the outcome of this work will need to be considered by the Authority in due course.

APPENDIX 1 THE TIMING AND PHASING OF NEW ALLOCATIONS

Allocated Site Name	Total Site Capacity	Time lag to construction start in months			Phasing of Development (2015 - 2031)											
		Time period for pre-application discussions / PAC consultation	Time between submission of planning application and determination	Time taken from planning consent to the discharge of relevant conditions to enable site construction	Completions	U/c	2022 - 23	2023 -24	2024 -25	2025 - 26	2026 -27	2027 -28	2028 - 29	2029 - 30	2030 -31	Units beyond the plan period
Land North of the Business Park (HA1)	15										2	2	2	2	2	5
Land at Sandy Hill (HA2)	68							11	11	12	7	7	7	7	6	
North of Whitlow (HA3)	54							9	9	9	5	5	5	6	6	
Penny Farm (HA4)	36							6	6	6	4	4	4	3	3	
North, east and south of Marine Road (HA5)	87							11	11	13	6	6	6	6	6	22
West of the Green (HA7)	10										2	2	2	2	2	
Glasfryn Field (HA8)	7										1	1	1	1		3
Land adjacent to Bryngolau (HA9)	10										1	1	1	1		6
Land off Cefn Gallod (HA10) NP/21/0577/FUL	11	28 days						11								
	298						0	48	37	40	28	28	28	28	25	36

APPENDIX 2 THE TIMING AND PHASING OF SITES WITH PLANNING PERMISSION

Settlement Tier	Site Name	Total Site Capacity	Completions	U/c	2022 - 23	2023 -24	2024 -25	2025 - 26	2026 -27	2027 -28	2028 - 29	2029 - 30	2030 -31	Units beyond the plan period
Tenby (Tier 1)	White Lion Street / Deep Park / Upper Park Road (Delphi) (NP/11/064)	62	51											11
Tenby (Tier 1)	Brynhir (NP/19/0361/OUT)	144				42	51	51						-
Newport (Tier 2)	Feidr Eglwys (NP/15/0194/FUL)	35	35											
Saundersfoot (Tier 2)	Cambrian Hotel (NP/12/0054)	29	13											16
Saundersfoot (Tier 2)	The Incline (Ocean Point) (99/254, 06/611 and NP/14/0439)	20	16											4
St. Davids (Tier 2)	North of Twr y Felin (99/254 and 06/611)	9	8											1
St. Davids (Tier 2)	Land at Glasfryn Road (NP/18/0051/OUT)	70	70											
St. Davids (Tier 2)	West and East of Glasfryn Road (NP/18/0575/OUT and NP/19/0648/RES)	58	14		23	21								
St. Davids (Tier 2)	Adjacent Ysgol Bro Dewi (NP/18/0488/OUT)	11				5	6							
Dinas Cross (Tier 3)	North of Bay View Terrace (NP/19/0548/FUL)	17		17	17									
Jameston (Tier 3)	Green Grove (NP/15/0287/OUT)	9	8		1									
Jameston (Tier 3)	Opposite Bush Terrace (NP/18/0610/FUL)	38	-			21			4	4	3	3	3	


Settlement Tier	Site Name	Total Site Capacity	Completions	U/c	2022 - 23	2023 -24	2024 -25	2025 - 26	2026 -27	2027 -28	2028 - 29	2029 - 30	2030 -31	Units beyond the plan period
Lawrenny (Tier 3)	Adjacent Home Farm (NP/18/0622/FUL)	39			13	13	13							
Manorbier Station (Tier 3)	Buttyland (NP/19/0522/FUL) Outline for housing	14						7	7					
Manorbier Station (Tier 3)	Land at Station Road (NP/17/0283/FUL)	23			11	12								
Rosebush (Tier 3)	Near Belle Vue (NP/13/0086)	5			5									
Solva (Tier 3)	Ynys Dawel (HR/6124)	6						3					3	
St. Ishmaels (Tier 3)	Adj Primary School, Trewarren Road (NP/16/0219/OUT)	13			4	4	5							
St. Ishmaels (Tier 3)	Land off Trewarren Road (NP/18/0396/OUT)	14								7	7			
Countryside (Tier 4)	Blockett Lane, Little Haven (10/511)	6					3	3						
Countryside (Tier 4)	Boulston Manor, Uzmaston (04/400)	5												5
Countryside (Tier 4)	Rear of Caeglas, Whitchurch (05/509)	5	5											
Totals		632	220	17	74	118	78	64	11	11	10	3	6	37



Appendix 3 Future Wales 2040¹ – Parts relevant to the Pembrokeshire Coast National Park

Future Wales Reference	Relevance for Pembrokeshire Coast National Park	Compatibility with /consider alongside LDP 2 Relevant Policies include... Issues for Plan Review highlighted in blue.
What is this document?	Future Wales replaces the Wales Spatial Plan. Future Wales is the highest tier of development plan. Planning decisions at every level of the planning system in Wales must be taken in accordance with the development plan as a whole.	Local Development Plan 2 makes reference to the Wales Spatial Plan. These references primarily in the Introduction, Strategy, Spatial Strategy and Scale of Growth Sections will require updating at Review stage.
Policy 1 – Where Wales will grow	...Development and growth in towns and villages in rural areas should be of appropriate scale and support local aspirations and need.	<input checked="" type="checkbox"/> Plan's Spatial strategy is based on this approach
Supporting Text	<p>.....Beyond the National and Regional Growth Areas are a mix of smaller towns and villages and large areas of countryside. Many towns are traditionally market towns and have retained the function of being gathering places for people living and working in rural places. Along the coast our maritime and resort towns remain popular places in which to live and visit, though there is a need for regeneration in some places. Development in towns and villages in rural areas will support local aspirations and need, complementing rather than competing with efforts to grow our cities and towns. Policies 4 and 5 are particularly relevant in these places.</p> <p>By focusing large scale growth on the urban areas, development pressures can be channeled away from the countryside and productive agricultural land can be protected. Rural areas have an important function as providers of food, energy and mineral resources. Communities in rural areas are strongly supported; the aim is to secure sustainable economic and housing growth which is focused on retaining and attracting working age population and maintaining and improving access to services. In areas designated for their landscape or ecological importance, protection against inappropriate development remains in place.</p> <p>The spatial strategy empowers local policy and decision-makers to develop the national priorities through Strategic and Local Development Plans and identify areas and issues of significance to their particular areas.</p>	<input checked="" type="checkbox"/> Spatial Strategy is set out in Policy 2 to 7.
Policy 2 – Shaping Urban building sustainable places •mix of uses; • providing a variety of housing types and tenures; • building places at a walkable	<input checked="" type="checkbox"/> Policy 8 Special Qualities

¹ <https://gov.wales/sites/default/files/publications/2021-02/future-wales-the-national-plan-2040.pdf>

Growth and Regeneration – Strategic Placemaking	scale, with homes, local facilities and public transport within walking distance of each other ; ...• with development built at urban densities that can support public transport and local facilities ; • ... provides opportunities for the development of small plots, including for custom and self-builders; and • integrating green infrastructure , .. Planning authorities should use development plans to establish a vision for each town and city	Policy 29 Sustainable Design Policy 30 Amenity Policy 47 Housing Allocations Policy 48 Affordable Housing Policy 51 Housing Densities Policy 52 Housing Mix Policy 54 Community Facilities Policy 55 Infrastructure Requirements Policy 57 Town and District Shopping Centres Policy 59 Sustainable Transport
Supporting TextThis policy is primarily focused on shaping growth and regeneration within the National and Regional Growth Areas. The approach and the principles are also applicable to smaller towns and should be applied to reflect the local context. The principles above set out in Policy 2 are expanded on.	<input checked="" type="checkbox"/>
Policy 3 – Supporting Urban Growth and Regeneration – Public Sector Leadership	The Welsh Government will play an active, enabling role to support the delivery of urban growth and regeneration....	No obvious link.
Policy 4 – Supporting Rural Communities	Strategic and Local Development Plans must identify their rural communities, assess their needs and set out policies that support them. Policies should consider how age balanced communities can be achieved, where depopulation should be reversed and consider the role of new affordable and market housing, employment opportunities, local services and greater mobility in tackling these challenges.	<input checked="" type="checkbox"/> See references above. Population and Housing Projection work for the Local Development Plan identifies projected changes in the age profile of the National Park.
Policy 5 – Supporting the rural economy	...Strategic and Local Development Plans must plan positively to meet the employment needs of rural areas	<input checked="" type="checkbox"/> Policy 38 Visitor Economy Policy 43 Employment sites and live/work units Policy 45 Farm Diversification
Policy 6 – Town Centre First	Significant new commercial, retail, education, health, leisure and public service facilities must be located within town centres. They should have good access by public transport	<input checked="" type="checkbox"/> Policy 57 Town and District Shopping

	A sequential approach must be used to inform the identification of the best location for these developments ...	Centres Policy 59 Sustainable Transport
Policy 7 – Delivering Affordable Homes Local Development Plans planning authorities should develop strong evidence based policy frameworks to deliver affordable housing....	<input checked="" type="checkbox"/> Policy 46 Housing Policy 47 Housing Allocations Policy 48 Affordable Housing Policy 51 Housing Densities Policy 52 Housing Mix
Policy 8 – Flooding	The Welsh Government will work with Flood Risk Management Authorities and developers to plan and invest in new and improved infrastructure, promoting nature-based solutions as a priority.	No obvious link. Policy focusses on National and Regional Growth Areas which lie outside the National Park.
Planning authorities should include these areas (Resilient Ecological Networks and Green Infrastructure) and/or opportunities in their development plan strategies and policies in order to promote and safeguard the functions and opportunities they provide.	<input checked="" type="checkbox"/> Policy 8 Special Qualities Policy 10 Sites and Species of European Importance Policy 11 Nationally Protected Sites and Species Policy 12 Local Areas of Nature Conservation or Sites of Geological Interest Policy 15 Open Space Policy 16 Green Wedges.
National Natural Resources Map		<input checked="" type="checkbox"/> Policy 8 Special Qualities Consider mapping of 'Biodiversity hotspots' at next Development Plan review and/or Green Infrastructure Assessment. Consider referencing within development plan policy text.

Policy 10 – International Connectivity	Ports and Airports	No obvious link.
Policy 11 – National Connectivity	Rail Bus Strategic Road National Cycle Connectivity	<input checked="" type="checkbox"/> Policy 59 Sustainable Transport
Metro /Mainline Improvements mapped Policy 31 – South West Metro	 <p>South West Wales Metro</p> <ul style="list-style-type: none"> The South West Wales Metro including rail, bus, and active travel is currently being developed by the region's local authorities Increased South Wales Mainline services (to Carmarthen and Pembroke Dock/ Milford Haven) and a potential strategic West Wales Parkway  <p>South Wales Mainline</p> <ul style="list-style-type: none"> More services to enable mix of express and stopping services from London and Bristol Temple Meads across South Wales to Pembrokeshire Improved journey times: Cardiff-London 85 minutes, Cardiff-Swansea 30 mins, Cardiff-Bristol Temple Meads 35 mins, Carmarthen-Cardiff 25mins TEN-T standards, including electrification, gauging and line speed improvements 	<input checked="" type="checkbox"/> Policy 59 Sustainable Transport
Policy 13 – Supporting Digital Communications	Planning authorities must engage with digital infrastructure providers to identify the future needs of their area... New developments should include the provision of Gigabit capable broadband infrastructure from the outset.	<input checked="" type="checkbox"/> Policy 63 Telecommunications Refer to in pre application advice – see email extract from WG – copied below
Policy 14 – Planning in Mobile Action Zones	The Welsh Government, planning authorities and mobile telecommunications operators must work together to achieve increases in mobile coverage within Mobile Action Zones.	<input checked="" type="checkbox"/> Policy 63 Telecommunications
Policy 15 – National Forest	The Welsh Government is committed to developing a national forest through the identification of appropriate sites and mechanisms. Action to safeguard proposed locations for the national forest will be supported.	<input checked="" type="checkbox"/> Policy 8 Special Qualities Policy 55 Infrastructure Requirements
Policy 16 – Heat Networks		No locations identified.
Policy 17 – Renewable and Low Carbon Energy and Associated Infrastructure	The Welsh Government strongly supports the principle of developing renewable and low carbon energy from all technologies and at all scales to meet our future energy needs There is a presumption in favour of large-scale wind energy development (including repowering) in these areas (Pre-assessed), subject to the criteria in policy 18. Applications for large-scale wind and solar will not be permitted in National Parks and Areas of Outstanding Natural Beauty...	See below for advice.

Wind Energy and Heat Networks Mapped



Policy 18 – Renewable and Low Carbon Energy Developments of National Significance

Proposals for renewable and low carbon energy projects (including repowering) qualifying as Developments of National Significance will be permitted subject to policy 17 and the following criteria:
1. outside of the Pre-Assessed Areas for wind developments and everywhere for all other technologies, the proposal does not have an unacceptable adverse impact on the surrounding landscape **(particularly on the setting of National Parks and Areas of Outstanding Natural Beauty)**



Policy 14 Conservation and enhancement of the Pembrokeshire Coast National Park and supporting text paragraph 4.88

Cumulative Impact of Wind Turbines Supplementary Planning Guidance is also relevant.

Policy 19 – Strategic Policies for Regional Planning

Sets out the requirements for strategic development plan preparation

Strategic Development Plan to be prepared.

National Parks

National Park Authorities are unique planning entities with a specific remit to reflect the distinctive characteristics of their areas. National Parks are at the heart of resilient ecological networks and have a key role to play in Strategic Development Plans as part of the sustainable management of natural resources, protecting Wales's cultural heritage and promoting health and well-being. **Future Wales policies respect the functions of National Parks in terms of their statutory purposes. At the regional scale, where National Park Authorities will be considered in the context of a wider spatial region, their statutory duty must inform Strategic Development Plans.** Planning Policy Wales sets out the wider planning policy context for National Parks.



Policy 1 National Park Purposes and Duty Strategic Development Plan to be prepared.

Email extract 01 July 2021

My colleague Richard Spear (copied in) has provided the following regarding your second query: PPW para 5.2.17 (and Future Wales Policy 13 Supporting Digital Communications) – “new development should include the provision of ‘gigabit capable’ broadband infrastructure from the outset”. At the present time building regulations, set out in [Approved Document R - Physical infrastructure for high-speed electronic communications networks](#), only covers the installation of infrastructure within a building from the service provider’s access point (usually on the external wall of a building) to the occupier’s network termination point (usually a point within the building). It is not a requirement to provide any network cabling or equipment, or any in-building infrastructure that extends internally beyond the network termination point. Similarly Part R does not cover the provision of any external or site-wide infrastructure beyond the access point. Part R also doesn’t specifically refer to ‘gigabit capable’ but instead refers to a requirement (R1) to provide the in-building physical infrastructure to facilitate the future installation of copper or fibre-optic cables or wireless devices capable of delivering broadband speeds greater than 30 Mbps.

PPW and Future Wales refer to the provision of ‘gigabit capable infrastructure from the outset. ‘Gigabit capable’ is a term used to refer to fast broadband connectivity typically delivered by fibre to the premises (FTTP) technology. FTTP is capable of delivering 1000 Mbps (or 1 gigabit) and beyond, although actual speeds depend on the internet service provided. As a minimum this should include onsite ducting to enable the delivery of fibre to the property.

In practice it is usually the communications provider or a combination of the communications provider and developer that install the digital infrastructure for a development. Developers should contact communications providers (such as Openreach and Virgin Media) as early as possible in the development process so that where fibre is or will be available a plan for its installation can be agreed.

For developments over a certain threshold (30 premises) Openreach will provide gigabit capable connections free of charge, there is then a sliding scale of costs as the number of premises reduce.

In terms of your development management process, our general advice would be that:-

- Your pre-application information advises developers of the requirement in Future Wales;
- That submissions explain/show how this issue will be addressed (e.g. ducting, mast, other) so it can be considered at determination stage; and
- If it isn’t clearly addressed in the submission, it may be appropriate to condition the requirement.

Planning Policy Wales Edition 11 published February 2021

Pembrokeshire Coast National Park Local Development Plan 2 policies

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SUMMARY

1. The purpose of this paper is to consider the implications of Planning Policy Wales 11 published February 2021 for the Pembrokeshire Coast National Park Local Development Plan 2. Local Development Plan 2 was adopted alongside Planning Policy Wales 10 which has now been superseded.
2. In summary the overall approach has been to consider if the text of the Local Development Plan 2 is fit for purpose when considered against Planning Policy Wales 11.
3. This review has resulted in no issues of a substantive nature arising for the Local Development Plan (2).

4. Paragraph 1.9 - PPW should be read as a whole, as aspects of policy and their application to a particular development proposal could occur in several parts of the document. Where **'must'** is used in the document it reflects a legislative requirement or indicates where action is needed now to make changes in practice over the long term to achieve strategic outcomes. Where **'should'** is used it reflects Welsh Government expectations of an efficient and effective planning system.
5. Figure 7: Figure 7 asks that development plans and proposals be assessed against the national sustainable placemaking outcomes (in Figure 5) and the strategic and spatial choices (Figure 5) and then the placemaking themes (Figure 6) and the detailed chapters of Planning Policy Wales Edition 11.

PLACEMAKING OUTCOMES AND THE OBJECTIVES OF LOCAL DEVELOPMENT PLAN 2

6. Table1 below picks up on the relationship between the outcomes in Planning Policy Wales 11 and the objectives of the Plan shown in brackets. The objectives themselves as set out in the Plan include specific Local Development Plan policy references. Focus is on where immediate positive relationships can be identified. No obvious areas of conflict were identified. All denote a direction of travel which is consistent in approach.
7. The Authority also attempted a comparison of the Placemaking outcomes with the Vision of the Plan but the analysis was too ephemeral to be meaningful.

TABLE 1 PLACEMAKING OUTCOMES AND THE OBJECTIVES OF THE LOCAL DEVELOPMENT PLAN

<p>1. Creating and Sustaining Communities</p> <ul style="list-style-type: none"> • Enables the Welsh language to thrive (Welsh Language & Culture) • Appropriate development densities (Landscape & Seascape) (Sustainable Design) (Affordable Housing and Housing) • Homes and jobs to meet society's needs (Scale and Location of Growth) (Employment) (Affordable Housing and Housing) (Retail) • A mix of uses (Scale and Location of Growth) (Employment), (Enjoyment), (Affordable Housing and Housing) (Community Facilities) (Retail) • Offers cultural experiences (Historic Environment) (Landscape and Seascape) (Enjoyment) (Community Facilities) (Welsh Language & Culture) • Community based facilities and services (Community Facilities)(Retail)(Transport) (Utilities)
<p>2. Growing Our Economy in a Sustainable Manner</p> <ul style="list-style-type: none"> • Fosters economic activity (Historic Environment) (Scale and Location of Growth) (Employment, Enjoyment) (Affordable Housing & Housing), (Retail), (Transport), (Utilities) • Enables easy communication (Utilities) • Generates its own renewable energy (Sustainable Design) (Renewable Energy) • Vibrant and dynamic (Community Facilities, Retail) (Scale & Location of Growth) (Employment), (Enjoyment), (Affordable Housing & Housing), (Transport) • Adaptive to change (Scale and Location of Growth) (Biodiversity & Geodiversity), (Landscape & Seascape), (Sustainable Design), (Coastal Management) (Flooding) (Employment) • Embraces smart and innovative technology (Renewable Energy) (Sustainable Design) (Employment) (Utilities)
<p>3. Making Best Use of Resources</p> <ul style="list-style-type: none"> • Makes best use of natural resources (Biodiversity & Geodiversity), (Landscape & Seascape), (Minerals), (Pollution), (Unstable land and contamination), (Renewable Energy), (Soil Air and Water Quality), (Sustainable Design) • Prevents waste (Waste), (Pollution Unstable Land & Contamination), (Renewable Energy), (Sustainable Design),

<ul style="list-style-type: none"> • Prioritises the use of previously developed land and existing buildings (Historic Environment), (Scale & Location of Growth) • Unlocks potential and regenerates (Historic Environment) (Pollution, Unstable Land and Contamination) (Renewable Energy) (Employment) (Enjoyment) (Affordable Housing & Housing) (Community Facilities) (Retail) (Scale & Location of Growth) • High quality and built to last (Sustainable Design), (Coastal Management), (Flooding) (Affordable Housing & Housing) 	<p>4. Maximising Environmental Protection and Limiting Environmental Impact</p> <ul style="list-style-type: none"> • Resilient biodiversity and ecosystems (Biodiversity and Geodiversity), (Landscape & Seascape) (Renewable Energy), (Soil, Air & Water Quality), (Sustainable Design), (Enjoyment) • Distinctive and special landscapes (Historic Environment), (Biodiversity & Geodiversity), (Scale & Location of Growth), (Landscape and Seascape) (Minerals) (Waste), (Ministry of Defence), (Renewable Energy), (Soil Air and water Quality), (Sustainable Design), (coastal management), (flooding), (employment), (enjoyment), (utilities). • Integrated green infrastructure (Biodiversity and Geodiversity), (Landscape & Seascape), (Scale & Location of Growth), (Sustainable Design), (Community Facilities) • Appropriate soundscapes (Historic Environment), (Landscape and Seascape), (Scale & Location of Growth), (Minerals), (Ministry of Defence). (Sustainable Design) • Reduces environmental risks (Biodiversity & Geodiversity) (Landscape & Seascape) (Minerals), (Waste) (Pollution & Unstable Land and Contamination), (Sustainable Design) (Soil, Air, Water Quality) (Coastal Management) (Flooding), • Manages water resources naturally (Biodiversity & Geodiversity), (Sustainable Design) (Soil, Air, Water Quality) (Landscape & Seascape), (Pollution, Unstable Land, Contamination) (Flooding) (Utilities) • Clean air (Biodiversity & Geodiversity), Landscape & Seascape) (Renewable Energy) (Soil, Air & Water Quality), (Sustainable Design), • Reduces overall pollution (Biodiversity & Geodiversity) (Sustainable Design)(Soil, Air, Water Quality) (Pollution, Unstable Land Contamination) (Renewable Energy), (Transport) • Resilient to climate change (Biodiversity & Geodiversity), (Renewable Energy), (Soil air and Water Quality) (Sustainable Design),(Coastal Management) (Flooding) • Distinctive and special historic environments (Historic Environment), (Minerals), (Sustainable Design), (Retail), (Landscape & Seascape).
<p>5. Facilitating Accessible and Healthy Environments</p> <ul style="list-style-type: none"> • Accessible and high quality green space (Historic Environment), (Biodiversity and Geodiversity) (Landscape and Seascape) (Community Facilities) • Accessible by means of active travel and public transport (Scale and Location of Growth) (Sustainable Design) (Community Facilities) (Retail), (Transport) • Not car dependent (Scale and Location of Growth), (Sustainable Design), (Employment), (Housing), (Community Facilities), (Retail), • Minimises the need to travel (Scale and Location of Growth), (Waste), (Sustainable Design), (Employment), (Housing), (Community Facilities), (Retail) • Provides equality of access (Landscape & Seascape), (Scale & Location of Growth), (Sustainable Design) (Employment, Enjoyment) (Affordable Housing and Housing) (Utilities)(Transport)(Community Facilities) (Retail) • Feels safe and inclusive (Landscape & Seascape), (Scale & Location of Growth), (Sustainable Design) (Coastal Management), (Flooding), (Employment), (Enjoyment) (Affordable Housing and Housing) (Utilities)(Transport)(Community Facilities) (Retail) • Supports a diverse population (Scale & Location of Growth), (Sustainable Design), (Employment), (Enjoyment), (Affordable Housing & Housing), (Community Facilities), (Retail), (Transport). • Good connections (Scale and Location of Growth) (Sustainable Design), (Employment), (Affordable Housing &Housing) (Utilities)(Transport)(Community Facilities) 	

- Convenient access to goods and services (Scale and Location of Growth) (Waste), (Employment), (Affordable Housing & Housing), (Retail) (Utilities)(Transport)(Community Facilities)
- Promotes physical and mental health and well-being (Historic Environment), (Biodiversity & Geodiversity), (Landscape & Seascape), (Pollution, Unstable land, Contamination) (Sustainable Design), (coastal management), (flooding), (enjoyment), (employment), (Scale and Location of Growth) (Utilities)(Transport)(Community Facilities)

8. The degree to which the detail of Planning Policy Wales 11 under the Strategic and Spatial Choices and placemaking chapters are reflected in the various policies of the Local Development Plan are analysed in Table 2 overleaf.
9. The table below identifies each policy reference in Local Development Plan 2, the equivalent Planning Policy Wales reference along with any additional considerations that are required (beyond application of the Plan) as a result of the publication of Planning Policy Wales 11. Topic areas under the various strategic choices and placemaking themes are highlighted in pink in column 3.

TABLE 2 LOCAL DEVELOPMENT PLAN 2 AND PLANNING POLICY WALES 11

LDP Topic/ Policy Area	ADOPTED LDP2 Ref	Planning Policy Wales Edition 11	Verdict (edits needed for Review in blue)
Introduction	1.6 refers to PPW10	No change in PPW11	No change in policy approach from LDP2 to flag up here– At Review Stage update to PPW reference only 'Planning Policy Wales Edition 10, December 2018' Replace with: 'Planning Policy Edition 11, February 2021'
Objectives Minerals	Footnote 22 paragraph 5.14.35	No change in PPW 11	No change in policy approach from LDP2 to flag up here – At Review Stage update to PPW reference only 'Planning Policy Wales, Edition 10, December 2018, paragraph 5.14.35' Replace with: 'Planning Policy Wales Edition 11, February 2021, paragraph 5.14.35'
Objectives: Major Development	Footnote 23 refers to PPW 10	No change in PPW 11 – Major Development test	No change in policy approach from LDP2 – At Review Stage update to PPW reference only Planning Policy Wales, Edition 10, December 2018, paragraph 6.3.10' Replace with: 'Planning Policy Wales, Edition 11, February 2021, paragraph 6.3.10'
Key Outcomes	Footnote 24 paragraph 6.3.10 and 5.14.35	No change in PPW 11 – Major Development test and Minerals	No change in policy approach from LDP2 – At Review Stage update to PPW reference only 'Planning Policy Wales, Edition 10 December 2018, paragraph 6.3.10 and 5.14.35' Replace with: 'Planning Policy Wales. Edition 11 February 2021, paragraph 6.3.10 and 5.14.35'
Objectives Pollution etc.	Footnote 26 Chapter 6	See Chapter 6	No change in policy approach from LDP2 – At Review Stage update to PPW reference only 'Planning Policy Wales, Edition 10 December 2018, Chapter 6' Replace with 'Planning Policy Wales, Edition 11 February 2021, Chapter 6'
Objectives Soil etc.	Footnote 27 Chapter 6	See Chapter 6	No change in policy approach from LDP2 – At Review Stage update to PPW reference only 'Planning Policy Wales, Edition 10 December 2018, Chapter 6' Replace with 'Planning Policy Wales, Edition 11 February 2021, Chapter 6'
Policy 1		Spatial Strategy and Site Search Sequence para 3.41, page 33, Accessibility 3.49, page 35, Previously developed land para 3.55, page 35	No change in policy approach from LDP 2
Policy 2		Spatial Strategy and Site Search Sequence para 3.41, page 33, Accessibility 3.49, page 35,	No change in policy approach from LDP2

LDP Topic/ Policy Area	ADOPTED LDP2 Ref	Planning Policy Wales Edition 11	Verdict (edits needed for Review in blue)
		Previously developed land para 3.55, page 35	
Policy 3		Spatial Strategy and Site Search Sequence para 3.41, page 33, Accessibility 3.49, page 35, Previously developed land para 3.55, page 35	No change in policy approach from LDP2
Policy 4		Spatial Strategy and Site Search Sequence para 3.41, page 33, Accessibility 3.49, page 35, Previously developed land para 3.55, page 35	No change in policy approach from LDP2
Policy 5		Spatial Strategy and Site Search Sequence para 3.41, page 33, Accessibility 3.49, page 35, Previously developed land para 3.55, page 35	No change in policy approach from LDP2
Policy 6		Spatial Strategy and Site Search Sequence para 3.41, page 33, Accessibility 3.49, page 35, Previously developed land para 3.55, page 35	No change in policy approach from LDP2
Policy 7		Placemaking in Rural Areas para 3.38, page 32 Development in the Countryside para 3.60 page 38 Sustainable Transport para 4.1.9, page 47 Accessibility 3.49, page 35	No change in policy approach from LDP2
Countryside: Para 4.41 Reasoned Justification to Policy 7	Footnote 46: Refers to paragraph 3.56 of PPW10 – strictly controlling development in the countryside.	Development in the Countryside See Paragraph 3.60, page 38	No change in policy approach from LDP2 – At Review Stage update to PPW reference only 'Planning Policy Wales, Edition 10 December 2018, paragraph 3.56' Replace with: 'Planning Policy Wales, Edition 11 February 2021, paragraph 3.60'
Countryside Policy 7 Criterion a) rural enterprise dwelling	Footnote 48 refers to paragraphs 4.2.36 to 4.2.37 of PPW 10 which refers to policy for rural enterprise dwellings and TAN6 and rural	Rural Enterprise Dwellings 4.2.36 to 4.2.37 – No change.	LDP 2 is wholly reliant on PPW for policy advice. The text of PPW11 still refers to the need to follow the Guidance in: Technical Advice Note 6, Planning for Sustainable Rural Communities (2010) https://gov.wales/topics/planning/policy/tans/tan6/?lang=en No change in policy approach from LDP2 – At Review Stage update to PPW reference only 'Planning Policy Wales, Edition 10, December 2018, paragraphs 4.2.36 to 4.2.37' Replace with:

LDP Topic/ Policy Area	ADOPTED LDP2 Ref	Planning Policy Wales Edition 11	Verdict (edits needed for Review in blue)
	enterprise dwellings.		'Planning Policy Wales, Edition 11, February 2021, paragraphs 4.2.36 to 4.2.37'
Countryside Policy 7 Criterion b) farm diversification including farm shops		4.3.42 – sets out criteria for farm shops. Rural Business Diversification – see paragraphs 5.6.10 to 5.6.13.	No change in policy approach from LDP2. TAN 6 paragraph 3.8 still applies for farm shops and 3.7 for farm diversification.
Countryside Policy 7 Criterion c) conversion		5.6.10 Planning authorities should also adopt a positive approach to the conversion of rural buildings for business re-use.	No change In policy approach from LDP2
Policy 7 Criterion g) new farm buildings	Footnote 49 refers to PPW 10 para 5.6.7	5.6.9 - intensive livestock developments	No change in policy approach from LDP2 – At Review Stage update to PPW reference only 'Planning Policy Wales, Edition 10, December 2018, paragraph 5.6.7' Replace with 'Planning Policy Wales, Edition 11, February 2021, paragraph 5.6.9'
Policy 7) Criterion h)	Footnote 50 refers to PPW 10 Para 5.6.4	Para 5.6.6 – employment locations	No change in policy approach from LDP2 –At Review Stage update to PPW reference only 'Planning Policy Wales, Edition 10, December 2018, paragraph 5.6.4' Replace with 'Planning Policy Wales, Edition 11, February 2021, paragraph 5.6.6'
Para 4.50 farm buildings	Refers to PPW 10 para 5.6.6	Para 5.6.8	No change in policy approach from LDP2 –At Review Stage update to PPW reference only 'Planning Policy Wales, Edition 10, December 2018, paragraph 5.6.6' Replace with 'Planning Policy Wales, Edition 11, February 2021, paragraph 5.6.8'
Para 4.51 Agricultural land	Refers to PPW 10 para 3.54	Para 3.58	No change in policy approach from LDP2 –At Review Stage update to PPW reference only 'Planning Policy Wales, Edition 10, December 2018, paragraph 3.54' Replace with 'Planning Policy Wales, Edition 11, February 2021, paragraph 3.58'
Policy 8 Special Qualities	Footnote 58 refers sections 6.6-6.9 of PPW 10 re pollution issues	Climate Change, Decarbonisation and Sustainable Management of Natural Resources (3.30) pg. 30 Green Infrastructure (6.2) pg. 131 Landscape (6.3) pg. 133 Biodiversity and Ecological Networks (6.4) pg. 136 Air Quality and Soundscape (6.7) pg. 154	Paras 3.30-3.33 in the Sustainable Management of Natural Resources has been updated to refer to the declaration of a climate emergency in 2019, the decarbonisation of the energy system as well as the sustainable management of natural resources. Targets for the reduction of greenhouse gases to net zero by 2050 are also included. Para 3.22 of Promoting Healthier Places refers to the incorporation of drinking water fountains or refill stations in public places. At Review Stage update to PPW reference only

LDP Topic/ Policy Area	ADOPTED LDP2 Ref	Planning Policy Wales Edition 11	Verdict (edits needed for Review in blue)
		Promoting Healthier Places (3.19) See above for references to pollution with water air and soil, waste water management. Noise pollution in Soundscape section 6.7 Also air borne pollution with transport 4.1.15, noise pollution with transport assessment 4.1.55.	'Chapter 6 Planning Policy Wales Edition 10, December 2018 sections 6.6 to 6.9... Replace with 'Chapter 6 Planning Policy Wales, Edition 11, February 2021 sections 6.6 to 6.9...
Policy 8d)	Footnote 59 refers to Chapter 6 of PPW 10 and TAN 24	See - Recognising the Special Characteristics of Places 6.1 The Historic Environment Para 6.1.24 – additional text to clarify historic environment best practice guidance on giving consideration to the settings of archaeological remains as part of development proposals.	<u>Policy 8 criterion d) relies on Planning Policy Wales Edition 11 Chapter 10. Please note that additional text has been added to Planning Policy Wales Edition 11 regarding the historic environment which advises that it will only be in exceptional circumstances that planning permission will be granted if development would result in an adverse impact on a scheduled monument (or an archaeological site shown to be of national importance) or has a demonstrably and unacceptably damaging effect upon its setting.</u> At Review Stage update to PPW reference only 'Chapter 6 Planning Policy Wales. Edition 10, December 2018' Replace with 'Chapter 6 Planning Policy Wales, Edition 11, February 2021'
Policy 8e)	Footnote 60 refers to Chapter 6 PPW 10	Chapter 6	At Review Stage update to PPW reference only 'Planning Policy Wales, Edition 10, December 2018, Chapter 6' Replace with 'Planning Policy Wales, Edition 11, February 2021, Chapter 6'
	Footnote 66 refers to PPW 10 section 6.5	6.5 Coastal Areas Development on the Coast 6.5.9 – relies on TAN Technical Advice Note (Wales) 14, Coastal Planning, Welsh Office, 1998. Development should not normally be proposed in coastal locations unless it needs to be on the coast. Directing to the developed areas but avoiding areas likely to subject to coastal change	At Review Stage update to PPW reference only 'Planning Policy Wales, Edition 10, December 2018, section 6.5' Replace with 'Planning Policy Wales, Edition 11, February 2021, section 6.5'
Biodiversity	Para 4.63 refers to PPW 10 – Chapter 6	Biodiversity (6.4) pg. 136 No change in PPW 11	No change – At Review Stage update to PPW references only 'Planning Policy Wales, Edition 10, December 2018' Replace with 'Planning Policy Wales, Edition 11, February 2021'
Policy 9		Lighting (6.8) pg. 159	No change.

LDP Topic/ Policy Area	ADOPTED LDP2 Ref	Planning Policy Wales Edition 11	Verdict (edits needed for Review in blue)
Policy 10		European (paras 6.4.18, 6.4.22 and 6.4.23)	No change.
Policy 11		National (para 6.4.5)	No change.
Policy 12		Biodiversity and Ecological Networks (6.4) pg. 136	No change
Policy 13		Welsh Language and Placemaking (3.25) pg.30	No change.
Historic Environment	Para 4.79 refers to PPW 10 Chapter 6	The Historic Environment (6.1) pg. 125	Please note that Planning Policy Wales Edition 11 Para 6.1.24 - <u>includes additional text to PP10 - that it will only be in exceptional circumstances that planning permission will be granted if development would result in an adverse impact on a scheduled monument (or an archaeological site shown to be of national importance) or has a demonstrably and unacceptably damaging effect upon its setting.</u> At Review Stage update PPW reference 'Planning Policy Wales, Edition 10, December 2018' Replace with 'Planning Policy Wales, Edition 11, February 2021'
Policy 14	Para 4.82 refers to PPW 10 para 6.3.5	Landscape Refer to PPW 11 Additional paragraph included in PPW11 to emphasise the importance of National Parks in light of the involvement of NPAs in the preparation of SDPs, reflecting the relevant policy in Future Wales.	No change to policy – At Review Stage update PPW reference only 'Planning Policy Wales, Edition 10, December 2018 paragraph 6.3.5 onwards' Replace with 'Planning Policy Wales, Edition 11, February 2021 paragraph 6.3.5 onwards' <u>Additional para 6.3.11 in Planning Policy Wales 11 – additional text highlights involvement of NPAs in SDP preparation. SDP areas will be the area of the CJC and include all or any part of any NPA within the CJC area. Membership of a CJC does not affect the statutory purposes of National Parks. This is of relevance to us when we are participating in Strategic Development Plan preparation.</u>
Policy 15 Open Space	Para 4.90 refers to PPW 10 section 4.5 and paragraphs 4.1.18 to 4.1.24 and 3.60 – 3.73	Recreational Spaces (4.5) pg. 70 Managing Settlement Form (3.64) pg. 38 Active and Social Streets (4.1.19) pg. 49	At review Stage update PPW reference only 'Planning Policy Wales, Edition 10, December 2018. Please refer to section 4.5 and paragraphs 4.1.18 to 4.1.24 and 3.60 to 3.73' Replace with 'Planning Policy Wales, Edition 11, February 2021. Please refer to section 4.5 and paragraphs 4.1.19 to 4.1.25 and 3.64 to 3.78'
Policy 16 Green Wedges	Para 4.94 refers to PPW 10 para 3.69 re planning applications in green wedges	Promoting Healthier Places (3.19 – 3.24) Managing Settlement Form (3.64) pg. 38 Para 3.73 (pg. 40) – planning applications in green wedges	No change – At Review Stage update PPW reference only 'Planning Policy Wales, Edition 10, December 2018 paragraph 3.69' Replace with: 'Planning Policy Wales, Edition 11, February 2021 paragraph 3.69'

LDP Topic/ Policy Area	ADOPTED LDP2 Ref	Planning Policy Wales Edition 11	Verdict (edits needed for Review in blue)
Policy 17 Shore based facilities	Para 4.95 refers to PPW 10 Chapter 6, section 6.5	Coastal Areas (6.5) pg. 145 6.5.2 Reference to the Marine Plan followed by references to interactions between land and sea. 6.5.9 Directing development to developed parts of the coast.	No change – At Review Stage update PPW reference only 'Planning Policy Wales, Edition 10, December 2018' Replace with: 'Planning Policy Wales, Edition 11, February 2021'
Policy 18 Harbours	Para 4.102 refers to PPW 10 paras 5.3.14- 5.3.16	Ports, Harbours, Marinas and Inland Waterways (5.3.14) pg. 82 No change in PPW 11	No change – At Review Stage update PPW reference only 'Planning Policy Wales, Edition 10, December 2018' Replace with: 'Planning Policy Wales, Edition 11, February 2021'
Major Development	Paragraph 4.107 refers to para 6.3.10 and 5.14.35	No change in PPW 11	No change – At Review Stage update PPW reference only 'Planning Policy Wales Edition 10, December 2018' Replace with: 'Planning Policy Wales, Edition 11, February 2021'
Policy 19 Hazardous Installations		Hazardous Installations 5.4.13 – last bullet page 84 – no change in PPW 11	No change.
Para 4.121 e)	Paragraph 14.3.2	5.14.35 – no change in PPW 11	No change.
Policy 20 Scale of Growth	Footnote 76 refers to PPW 10 para 6.3.10 and footnote 77 refers to PPW 10 para 5.14.35	No change to references in PPW 11.	No change to policy approach. At Review Stage update PPW reference only 'Planning Policy Wales, Edition 10, December 2018, paragraph 6.3.10 / 5.14.35 Replace with: 'Planning Policy Wales, Edition 11, February 2021, paragraph 6.3.10/5.14.35'
Minerals 4.122 and footnote 78	Refers to PPW 10 para 5.14.35	Minerals (5.14) pg. 106 No change to reference in PPW 11.	No change. At Review Stage update PPW reference only 'Planning Policy Wales, Edition 10, December 2018, paragraph 5.14.35 Replace with: 'Planning Policy Wales, Edition 11, February 2021, paragraph 5.14.35'
Minerals	Para 4.126 and footnote 82 refers to PPW 10 section 5.14	No change to reference in PPW 11.	No change. At Review Stage update PPW reference only 'Planning Policy Wales, Edition 10, December 2018, Section 5.14 Replace with: 'Planning Policy Wales, Edition 11, February 2021, paragraph 5.14'
Policy 21 Safeguarding		5.14.7 Safeguarding of minerals – no change	No change.
Policy 22 Buffer Zones		Buffer Zones 5.14.44, page 116	No change.
Para 4.128	Refers to 5.14.44	No change to reference in PPW 11.	No change. At Review Stage update to PPW reference only

LDP Topic/ Policy Area	ADOPTED LDP2 Ref	Planning Policy Wales Edition 11	Verdict (edits needed for Review in blue)
			'Planning Policy Wales, Edition 10. December 2018 (paragraph 5.14.44 onwards' Replace with: 'Planning Policy Wales, Edition 11, February 2021 (paragraph 5.14.44 onwards'
Policy 23 Borrow Pits criterion f)	Footnote 87 refers to PPW 10 para 5.14.34	Borrow Pits (5.14.33) pg. 114 No change to reference in PPW 11.	No change. At Review Stage update to PPW reference only 'Planning Policy Wales, Edition 10. December 2018 paragraph 5.14.34' Replace with: 'Planning Policy Wales, Edition 11, February 2021 paragraph 5.14.34'
Policy 25 Local Building Stone	Para 4.132 refers to PPW 10 para 5.14.35	No change to reference in PPW 11	No change. At Review Stage update PPW reference only 'Planning Policy Wales Edition 10, December 2018' Replace with: 'Planning Policy Wales, Edition 11, February 2021' Footnote updated as above and with paragraph 5.14.35
Para 4.139	Para 4.139 refers to PPW 10 Chapter 6 re unstable land	No change to reference in PPW 11	No change. At Review Stage update PPW reference only 'Planning Policy Wales Edition 10, December 2018' Replace with: 'Planning Policy Wales, Edition 11, February 2021'
Waste	Paragraph 4.140 refers to PPW 10	Climate Change, Decarbonisation and the Sustainable Management of Natural Resources (3.30) pg. 30 Waste (Making Best Use of Material Resources and Promoting the Circular Economy) (5.11) pg.100 5.11.2 Places emphasis on the Circular Economy principles that should underpin all developments. 5.11.3 emphasises the role that the planning system has to play in facilitating sustainable waste management and a clear waste hierarchy. 5.13.7 Refers to the Collections, Infrastructure and Markets (CIM) Sector Plan 2012 indicating a move towards the reduction of disposal and recovery options in favour of high volume source segregated collection followed by reprocessing as well as preparation for re-use and prevention.	No change. At Review Stage update PPW reference only 'Planning Policy Wales Edition 10, December 2018' Replace with: 'Planning Policy Wales, Edition 11, February 2021'
Policy 27 Local Waste		No change.	No change.

LDP Topic/ Policy Area	ADOPTED LDP2 Ref	Planning Policy Wales Edition 11	Verdict (edits needed for Review in blue)
Policy 28 Composting		No change.	No change.
Para 4.145	Refers to PPW10 – sustainable waste management facilities	PPW 11 – Para 5.13.1	No change. At Review Stage update PPW reference only 'Planning Policy Wales Edition 10, December 2018' Replace with: 'Planning Policy Wales, Edition 11, February 2021'
Policy 29 Sustainable Design		<p>Good Design (3.3) pg. 24 Promoting Healthier Places (3.20 & 3.22) Sustainable Transport – additional text in para 4.1.11 Active and Social Streets (4.1.19) page 49 Active Travel (4.1.34) Public Transport (4.1.36 and 4.1.39) which has additional text in response to feedback on the Active Travel (Wales) Act 2013 Ultra Low Emission Vehicles (4.1.40 and 4.1.41) – now only 2 paragraphs – the deleted paragraphs relate to non-residential development and have been transferred to Future Wales. Traffic Management (4.1.42) page 53 Car Parking (4.1.49) page 53 Reduce Energy Demand and Use of Energy Efficiency (5.8) page 90 Water and Flood Risk (6.6) page 148</p>	<p>Para 4.1.11 – additional text relating to infrastructure – <u>Importantly, sustainable transport infrastructure and services should be prioritised and put in place from the outset, before people have moved in and travel patterns have been established.</u> Commentary: This requirement is likely to affect only the largest developments – which will be captured with the Planning Obligations. We should continue to direct development to locations which are accessible by means other than cars. Our Parking standards SPG also uses an accessibility hierarchy to determine private parking provision. In other words – we already do all this. No need to change approach.</p> <p>Para 4.1.39 – additional text – <u>As outlined in paragraph 4.1.11, new public transport infrastructure and services should be put in place early on in a development, and before the people living there move in, to support sustainable travel patterns from the outset.</u></p> <p>Para 4.1.40 relating to Ultra Low Emission Vehicles has been amended as elements of it have been transferred to Future Wales – additional text – <u>Future Wales sets out the Welsh Government's requirements for the provision of electric vehicle charging points for non-residential development.</u></p> <p>Design Guidance: Active Travel (Wales) Act 2013 https://beta.gov.wales/active-travel-design-guidance Listed alongside the Manual for Streets 2 , Design Bulletin 32</p>
Policy 30 Amenity		<p>Promoting Healthier Places (3.19) Air Quality and Soundscape (6.7)</p>	No change.
Policy 31 Minimising Waste		5.12.9, page 103 – no change to reference in PPW 11	No change.
Policy 32 Surface Water Drainage		<p>Active and Social Streets (4.1.19) page 49 Sustainable Drainage Systems (6.6.17) page 150- no change to references in PPW 11</p>	No change.

LDP Topic/ Policy Area	ADOPTED LDP2 Ref	Planning Policy Wales Edition 11	Verdict (edits needed for Review in blue)
Policy 33 Renewable Energy	Footnote 106 refers to PPW 10 para 5.17.19 (this is a typo and should refer to 5.7.19)	Para 5.9.6 – updated reference.	No change in PPW policy. Update PPW to reference only. At Review Stage update to PPW reference only 'Planning Policy Wales, Edition 10, December 2018 paragraph 5.17.19' Replace with: 'Planning Policy Wales, Edition 11, February 2021 paragraph 5.9.6
Policy 33 Renewable Energy	Plan relies on a tailored approach that has been progressed through LDP Examination.	Energy (5.7) pg. 88 Renewable and Low Carbon Energy 5.9 page 91 5.9.14 – Planning authorities should support and guide renewable energy development to ensure their area's potential is maximised. Planning authorities should assess opportunities for renewable energy in their areas and use this evidence to establish spatial policies in their development plan which identify the most appropriate locations for development of energy developments below 10MW. There should be a presumption in favour of development in identified areas, including an acceptance of landscape change, with clear criteria-based policies setting out detailed location issues to be considered at the planning application stage. Outside these areas, policies should be developed with criteria against which planning applications will be determined. Future Wales sets out the Welsh Government's policies for the determination of renewable energy schemes of 10MW and more under the Developments of National Significance procedure, with a presumption in favour of large scale development within pre- assessed areas (5.9.17). Local planning authorities should not seek to amend the pre- assessed areas as they form part of the development plan (5.9.18)	National Park purposes are set out in primary legislation. No change to policy.

LDP Topic/ Policy Area	ADOPTED LDP2 Ref	Planning Policy Wales Edition 11	Verdict (edits needed for Review in blue)
		<p>In terms of development management, planning authorities should identify suitable ways to avoid, mitigate or compensate adverse impacts of renewable energy development (5.9.20). These should take into account cumulative impact amongst other factors.</p> <p>Planning authorities have a statutory duty to have regard to National Parks' and AONBs' purposes (6.3.5) and these areas must be afforded the highest status of protection from inappropriate developments (6.3.8). This duty applies in relation to all activities affecting the designated areas whether those activities lie within each area or in their setting. Planning authorities should give great weight to the statutory purposes which are to conserve and enhance natural beauty, wildlife and cultural heritage and to promote opportunities for public understanding and enjoyment of their special qualities (6.3.6). The special qualities should be given weight in the development planning and development management processes and proposals must be carefully assessed to ensure that their effects on features which the designation is intended to protect are acceptable (6.3.9) As a coastal planning authority both landward and seaward pressures and the impacts of these pressures need to be considered (6.5.4). The impacts associated with such activities can be widespread and overlap between sea and coastline. They may relate to inappropriate land use, pressure for services and facilities, and impacts on existing businesses and</p>	

LDP Topic/ Policy Area	ADOPTED LDP2 Ref	Planning Policy Wales Edition 11	Verdict (edits needed for Review in blue)
		employment as well as the natural and historic character of the coastline and seascape where there is extensive inter-visibility between land and sea along the coastline.	
Para 4.175	Refers to TAN 8	<p>TAN 8 has now been revoked. Large-scale wind energy is now dealt with in Future Wales – The National Plan 2040. It sets out two policies relating to wind energy and identifies ‘pre-assessed areas’.</p> <p>FUTURE WALES Policy 17 – Renewable and Low Carbon Energy and Associated Infrastructure states that the Welsh Government strongly supports the principle of developing renewable energy at all scales. Decision-makers must give significant weight to the need to meet the target to generate 70% of consumer electricity by renewable means by 2030. In pre-assessed areas for wind energy policy states that the Welsh Government has modelled the likely impact on the landscape and have found them capable of accommodating development in an acceptable way. There is a presumption in favour of large-scale wind energy development including repowering in these areas subject to the criteria in Policy 18. Applications for large scale wind energy development will not be permitted in National Parks and AONBs and all proposal should demonstrate that they will not have an unacceptable adverse impact on the environment.</p> <p>FUTURE WALES Policy 18 – Renewable and Low Carbon Energy Developments of National Significance states that renewable energy projects qualifying as Developments of National Significance (DNS)</p>	<p>No change – no pre-assessed areas are within the National Park.</p> <p>At Review Stage, an update to paragraph 4.175 will be required due to revocation of TAN 8. Local Involvement and Community Benefit is dealt with in Planning Policy Wales, Edition 11, February 2021 paragraphs 5.9.24 to 5.9.28.</p> <p>The Welsh Government Policy Statement on Local ownership of energy generation in Wales – benefitting Wales today and for future generations now states that energy projects can provide financial and non-financial benefits in the following ways:</p> <ul style="list-style-type: none"> • Ownership • Payments to landowners • Supply chain jobs / profit during construction and Operation and Maintenance • Non-domestic rates payments • Legacy infrastructure such as roads, grid and broadband • Investor profit • Community Benefit Funds • Non-financial benefits <p>Paragraph 4.175 to be updated with the Policy Statement as above.</p>

LDP Topic/ Policy Area	ADOPTED LDP2 Ref	Planning Policy Wales Edition 11	Verdict (edits needed for Review in blue)
		<p>will be permitted subject to policy 17 and criteria including:</p> <ol style="list-style-type: none"> 1) Outside of the pre-assessed areas for wind developments the proposal does not have an unacceptable adverse impact on the surrounding landscape (particularly on the setting of National Parks and Areas of Outstanding Natural Beauty). 2) There are no unacceptable adverse visual impacts on nearby communities and individual dwellings. <p>Cumulative impacts of existing and consented renewable energy schemes should also be considered.</p> <p>The background text recognises landscapes across Wales whose intrinsic value should be protected from inappropriate development and cites National Parks and AONBs/ However, outside these areas a positive policy framework exists. The pre-assessed areas are intended to provide certainty where, in principle, developments would be acceptable. In these areas there is a presumption in favour of large-scale onshore wind energy development and the associated landscape change subject to criteria in Policy 18. Outside these areas a positive policy framework still exists.</p> <p>Irrespective of location or scale the design and micro-siting of proposals must seek to minimise the landscape and visual impact, particularly those in close proximity to homes and tourism receptors. Both within and outside the</p>	

LDP Topic/ Policy Area	ADOPTED LDP2 Ref	Planning Policy Wales Edition 11	Verdict (edits needed for Review in blue)
		pre-assessed areas, communities should be protected from significant cumulative impacts to avoid unacceptable situations such as where smaller settlements could be potentially surrounded by large wind schemes.	
Para 4.176	Footnote 111 refers to development on the undeveloped coast – para 6.5.9	No change to reference in PPW 11	No change. At Review Stage update PPW reference only. 'Planning Policy Wales, Edition 10, December 2018, paragraph 6.5.9' Replace with: 'Planning Policy Wales, Edition 11, February 2021, paragraph 6.5.9'
Policy 34 Flooding & Coastal Inundation	Footnote refers to national policy prescriptions in relation to dealing with flooding and coastal inundation PPW 10	Footnote 114 – refer to PPW 11 Climate Change, Decarbonisation and the Sustainable Management of Natural Resources (3.30) pg. 30 Water and Flood Risk (6.6) pg. 148 Water Quality and Surface Water Flooding 6.6.14 Development and Flood Risk – 6.6.22 onwards – slight amendment to text to refer to the climate emergency rather than climate change. Technical Advice Note 15, Development and Flood Risk, Welsh Assembly Government 2004 www.wales.gov.uk/topics/planning/policy/tans/tan15%3Flang%3Den	No change – At review Stage update PPW reference only 'Planning Policy Wales, Edition 10, December 2018' Replace with: 'Planning Policy Wales, Edition 11, February 2021'
Policy 35 Dev. in Coastal Change Management Area		No change.	No change.
Policy 36 Relocation (Residential)		No change.	No change.
Policy 37 Relocation (non-residential)		No change.	No change.
Policy 38 Visitor Economy		Tourism (5.5) pg.85 - additional text to para 5.5.3 to	Para 5.5.3 — In rural areas, tourism-related development is an essential element in providing for a healthy and diverse economy. <u>In addition to more</u>

LDP Topic/ Policy Area	ADOPTED LDP2 Ref	Planning Policy Wales Edition 11	Verdict (edits needed for Review in blue)
		include active/green/cultural tourism in rural areas. The Rural Economy (5.6) pg. 86	<u>traditional forms of rural tourism, planning authorities should plan positively for active, green and cultural tourism where they are appropriate.</u> Development should be sympathetic in nature and scale to the local environment. Policy 38 Visitor Economy provides a context for considering proposals. There is reference to taking account of the Special Qualities within the policy wording.
Policy 39 Loss of Hotels		No change.	No change.
Policy 40 Self Catering		No change.	No change.
Para 4.205	Footnote 119 refers to PPW 10 paras 4.2.26 and 4.2.30	No change.	No change to policy approach. At Review Stage update PPW reference only 'Paragraph 4.2.26 and 4.2.30 Planning Policy Wales, Edition 10, December 2018' Replace with: 'Paragraph 4.2.26 and 4.2.30 Planning Policy Wales, Edition 11, February 2021'
Policy 41 Camping		No change.	No change.
Policy 42		No change.	No change.
Employment developments in rural areas	4.232 relies on Planning Policy Wales	Economic Development (5.4) pg. 83 The Rural Economy (5.6) pg. 86 The Rural Economy provides advice about the principal of allowing within <u>and adjacent to settlements, allowing the expansion of business in the countryside.</u> Section 5.6 has additional text to reflect economic uncertainty as a result of the climate emergency, coronavirus and Brexit and the need to plan positively to meet rural employment needs. Additional paragraphs are 5.6.1, 5.6.2 and 5.6.4	Additional paragraphs relating to rural economy: 5.6.1 relates to the need to respond flexibly to uncertainty to ensure success in rural areas. 5.6.2 relates to the need for planning authorities to support the development of a broad range of employment opportunities in rural areas to support the future well-being and sustainability of rural communities. 5.6.4 relates to the unlocking the potential of rural areas by adopting a positive approach to employment arising from foundation, innovative and technology based sectors including R&D in addition to those arising from traditional agriculture, forestry and leisure sectors. Proposals for diversification, new start-ups and microbusinesses should also be encouraged, where appropriate. Commentary: We just need to bear this in mind when considering proposals. I think we already do support a broad range of employment opportunities. Para 4.232: At Review Stage update PPW reference 'Planning Policy Wales, Edition 10, December 2018' Replace with: 'Planning Policy Wales, Edition 11, February 2021'
Policy 44 Protection of Employment		No change	No change.

LDP Topic/ Policy Area	ADOPTED LDP2 Ref	Planning Policy Wales Edition 11	Verdict (edits needed for Review in blue)
Policy 45 Farm Diversification		Rural Business Diversification Para 5.6.10 - 5.6.13 Farm diversification	No change.
Housing		Housing (4.2) pg. 54	
Policy 46 Housing		Para 4.2.3 Housing Requirement Para 4.3.10 Housing Delivery – updated section to reflect the policy changes regarding housing land supply. Paragraph 4.2.15 in PPW 10 relating to JHLAS has been deleted.	Para 4.2.10 states the preparation of the housing trajectory as part of the development plan. Specific requirements are set out in the Local Development Plan Manual 3. The adopted Local Development Plan includes a trajectory and the Manual provides advice on preparing the Annual Monitoring Report. No change to the Plan required. 4.2.11 states planning authorities must use their housing trajectory as the basis for monitoring the delivery of their housing requirement through the AMR process. See comment above. No change to policy.
Policy 47 Housing Requirements		Para 4.2.3 Housing Requirement Para 4.3.10 Housing Delivery	No change.
Para 4.278	Refers to PPW 10 para 4.2.31	No change to reference in PPW 11	No change. At Review Stage update PPW reference only 'Planning Policy Wales, Edition 10, December 2018 (paragraph 4.2.31)' Replace with: 'Planning Policy Wales, Edition 11, February 2021 (paragraph 4.2.31)'
Policy 48 Affordable Housing	Para 4.282 criterion d)	Affordable Housing 4.2.25, page 59 Section has been updated regarding the need for LPAs to make provision for affordable housing led sites in LDPs and Welsh Government's development quality standards. ¹ Para 4.232 in PPW 10 relating to 100% affordable housing sites has been replaced by text relating to affordable housing led sites.	Para 4.232 – Planning authorities must make provision for affordable housing led housing sites in their development plans. Such sites will include 50% affordable housing based on criteria reflecting local circumstances which are set out in the development plan and relate to the creation of sustainable communities. This issue was addressed through the Examination on the back of a letter from the WG Minister to all planning authorities. No further change to the LDP is needed. No change – criterion d) relating to delivery of affordable led housing added at examination.

¹ <https://gov.wales/sites/default/files/publications/2021-08/development-quality-requirements-for-housing-associations.pdf> Welsh Development Quality Requirements 2021. *'The standard will be applied in full to all publicly-funded affordable housing schemes submitted to Welsh Government at "concept" stage for technical scrutiny from 01 October 2021. New affordable homes delivered through planning agreements (under section 106 of the Town and Country Planning Act 1990) and planning conditions will only be required to meet the Appendix A and Appendix B "space requirements" for agreements entered into after 01 October 2021. We will keep this under regular review.'*

LDP Topic/ Policy Area	ADOPTED LDP2 Ref	Planning Policy Wales Edition 11	Verdict (edits needed for Review in blue)
Policy 49 Affordable Housing Exception Sites	Para 4.289 refers to national planning policy	Para 4.2.34	No change.
Policy 50 Housing Developments		No change	No change
Policy 51 Housing Densities		<p>Appropriate development densities, pg.19, 72 and 169.</p> <p>Para 4.2.11 – full range of housing types. Older people/people with disabilities. Lifetime homes standards.</p> <p>4.2.13 A range of site types</p> <p>Para 4.2.14 Prepare a site register</p>	<p>The policy provides a framework for evidence to support the mix and design of housing required. Working with Pembrokeshire County Council on a new Local Housing Market Assessment. See also Equalities Impact Assessment commentary on this issue.</p> <p>Sites of different sizes are included.</p> <p>This would be done outside the Plan. Discuss with Pembrokeshire County Council regarding this.</p> <p>The Authority is willing to work with a developer/owner with an interest in self build.</p> <p>No change to policy</p>
Policy 52 Housing Mix	Paragraph 4.297	<p>4.2.1 & 4.2.29 mix of housing</p> <p>4.2.15 Self build</p> <p>Para 4.2.29 – all affordable housing, including that provided through planning obligations and planning conditions, must meet the Welsh Government's development quality standards.²</p>	<p>No change.</p> <p>No change.</p> <p>This is an additional requirement that will need to apply in development control decision making. Paragraph 4.297 of the Local Development Plan will need updating at review stage.</p>
Policy 53 Gypsy and		Gypsy and Travellers (4.2.35)	No change.

² WG Email: 07 July 2021 Planning Policy Wales (PPW) Edition 11 includes a clarification that the Welsh Government's development quality standards (currently DQR 2005) apply to all affordable housing (as defined in TAN 2), including that delivered through planning obligations and planning conditions. This will continue to be the case when the new standards are introduced.

To be clear, the standards are applicable to all housing provided as "affordable housing" within the TAN 2 definitions delivered by RSL's, LA's or "others".

The latest DQR: [Welsh Development Quality Requirements 2021 \(gov.wales\)](https://gov.wales/welsh-development-quality-requirements-2021) Extract :The standard will be applied in full to all publicly-funded affordable housing schemes submitted to Welsh Government at "concept" stage for technical scrutiny from 01 October 2021. New affordable homes delivered through planning agreements (under section 106 of the Town and Country Planning Act 1990) and planning conditions will only be required to meet the Appendix A and Appendix B "space requirements" for agreements entered into after 01 October 2021. We will keep this under regular review.

LDP Topic/ Policy Area	ADOPTED LDP2 Ref	Planning Policy Wales Edition 11	Verdict (edits needed for Review in blue)
Traveller Sites			
Policy 54 Community Facilities		Community Facilities (4.4) pg. 70 Local and Village Shops (4.3.40) page 68	No change.
Policy 55 Infrastructure		Supporting Infrastructure (3.61) pg.38	No change.
Retail	Footnote 152 relates to PPW 10 Section 4.3 and edge of centre or out of centre retail at PPW 10 para 4.3.18	Retail and Commercial (4.3) pg. 62 No change to references in PPW 11.	No change. At Review stage update PPW reference only 'Planning Policy Wales, Edition 10, December 2018 section 4.3 / Planning Policy Wales, Edition 10, December 2018 starting at paragraph 4.3.18' Replace with: 'Planning Policy Wales, Edition 11, February 2021 section 4.3 / Planning Policy Wales, Edition 11, February 2021 starting at paragraph 4.3.18'
Policy 56 Retail	Footnote 154 refers to PPW 10 para 4.3.10 re retail hierarchy	No change to reference in PPW 11.	No change. At Review Stage update PPW reference only 'Planning Policy Wales, Edition 10, December 2018, section 4.3.10' Replace with: 'Planning Policy Wales, Edition 11, February 2021, section 4.3.10'
Para 4.310	Refers to PPW 10 Chapter 4 'Active and Social Places'	No change to Chapter 4 in PPW 11.	No change. At Review Stage update PPW reference only 'Planning Policy Wales, Edition 10, December 2018' Replace with: 'Planning Policy Wales, Edition 11, February 2021'
Policy 57 Town and District Shopping Centres		Mixed Uses and Primary and Secondary Shopping Areas 4.3.30. Town Centres first policy (para 4.3.18) Edge-of-centre or out-of centre sites (para 4.3.19-4.3.20) Paragraph 4.3.40 refers to Local and Village Shops, including shops ancillary to other uses, such as farm shops. The Importance of Evening and Night Time Economies (Para 4.3.43) page 69 No change to references in PPW 11.	No change.

LDP Topic/ Policy Area	ADOPTED LDP2 Ref	Planning Policy Wales Edition 11	Verdict (edits needed for Review in blue)
Policy 58 Garden Centres		No change.	No change.
Traffic	Para 4.323 refers advises PPW 10 sets out clear statements of national development control policy on traffic management , transport consideration s in development control, transport assessments and travel plans and access to development.	<p>Transport (4.1) pg. 46 Active Travel (4.1.26) pg. 50 Public Transport (4.1.36) pg 51 Ultra Low Emission Vehicles (4.1.40) pg 52 Traffic Management (4.1.42) pg 53</p> <p>Update to reference numbers only.</p>	<p>Para 4.1.11 – additional text relating to infrastructure – <u>Importantly, sustainable transport infrastructure and services should be prioritised and put in place from the outset, before people have moved in and travel patterns have been established.</u></p> <p>Para 4.1.39 – additional text – <u>As outline in paragraph 4.1.11, new public transport infrastructure and services should be put in place early on in a development, and before the people living there move in, to support sustainable travel patterns from the outset.</u></p> <p>Para 4.1.40 relating to Ultra Low Emission Vehicles has been amended as elements of it have been transferred to Future Wales – additional text – <u>Future Wales sets out the Welsh Government's requirements for the provision of electric vehicle charging points for non-residential development.</u></p> <p>At review Stage <u>update</u> PPW reference 'Planning Policy Wales, Edition 10, December 2018' <u>Replace with:</u> 'Planning Policy Wales, Edition 11, February 2021'</p>
Policy 59		<p>Transportation Infrastructure (5.3) pg. 79 Active Travel (4.1.26) Public Transport (4.1.36) Car Parking (4.1.49) Traffic Management (4.1.42)</p> <p>Update to reference numbers only.</p>	As above
Policy 60 Impacts of traffic		<p>Promoting Healthier Places (3.21 & 3.22) Transport Assessments (4.1.55 & 4.1.56)</p> <p>Update to reference numbers only.</p>	No change
Policy 61 Cycleways		<p>Active Travel 4.1.25, pg 50 – section expanded to make it a requirement to put active travel infrastructure in place early in the development process.</p> <p>4.1.33 cycle ways/Active Travel</p>	<p>Para 4.1.11 – additional text relating to infrastructure – <u>Importantly, sustainable transport infrastructure and services should be prioritised and put in place from the outset, before people have moved in and travel patterns have been established.</u></p> <p>Para 4.1.39 – additional text – <u>As outline in paragraph 4.1.11, new public transport infrastructure and services should be put in place early on in a development, and before the people living there move in, to support sustainable travel patterns from the outset.</u></p>

LDP Topic/ Policy Area	ADOPTED LDP2 Ref	Planning Policy Wales Edition 11	Verdict (edits needed for Review in blue)
Utility Services	4.330 PPW 10 sets out clear statements of national development control policy on water supply and quality and waste water management . Chapter 6	No change to references in PPW 11	No change. At Review Stage update PPW reference only 'Planning Policy Wales, Edition 10, December 2018' Replace with: 'Planning Policy Wales, Edition 11, February 2021'
Policy 62 Powerlines and Pipelines		Supporting Infrastructure (3.61) pg 38 5.7.8 Electricity Grid Network and Energy Storage (5.7.8) pg 89 5.9.20 Update to references only.	No change.
Policy 63 Tele- communications		Telecommunications (under Electronic Communications) (5.2) pg. 77 Section has been updated to reflect Future Wales. Additional text in para 5.2.1 relates to the need for fast reliable connections to reflect greater numbers of people working from home. 5.2.7 refers to Welsh Government collaboration with planning authorities for improving digital communications. 5.2.17 states that new development proposals should include the provision of 'gigabit capable' broadband infrastructure from the outset rather than just broadband services.	Para 5.2.1 additional text – <u>Fast reliable connections are essential to meet the needs of businesses and other organisations, and to those at home whether accessing new digital services or working. Greater numbers of individuals working from home are a growing trend and planning authorities should take this into account when preparing their development plans.</u> Para 5.2.7 – additional text – <u>The Welsh Government will work closely with planning authorities when, for example, it is pursuing initiatives or programmes aimed at improving digital telecommunications services and coverage across Wales.</u> Para 5.2.17 – additional text – <u>New development should include the provision of 'gigabit capable' broadband infrastructure from the outset, typically in the form of underground ducting on site, to enable broadband operators to connect easily to residents or businesses. 'Gigabit capable' would normally mean infrastructure suitable for fibre connectivity, but could also include fixed wireless infrastructure.</u> Commentary: On para 5.2.17 – this is a new requirement and something that DM need to be aware of.

Reference	Relevance for Pembrokeshire Coast National Park	Compatibility with / consider alongside LDP 2 Relevant Policies include... Issues for Plan Review
Sustainable Development	We need an environmental, social, cultural and economic recovery which is sustainable .	✓ LDP appraised. Most sustainable solution feasible taking account of deliverability chosen.
Design and Layout	<p>That a poor environment, with no or limited access to local goods, services and green spaces can have a severely detrimental impact on our mental and physical health and well-being, as well as our ability to protect our livelihoods.</p> <p>Could I live my whole life here? ..we cannot fall back on quick-build, poor quality development on sites which are not sustainable.</p>	<p>✓ See policies on open space, green infrastructure, national park designation, coastal protection. Also general strategy of directing development to locations where local facilities and services are available.</p> <p>This depends on what the standard of layout that is expected. There are different standards that impact on viability. Needs further explanation. See WG update on the standard of design required for affordable housing under Planning Policy Wales 11.²</p> <p>✓ See Sustainable Design policy.</p>
Decarbonisation, environmental protection, accessibility	<p>We need to rebuild a greener, cleaner society with decarbonisation and social justice at its heart which respects our environment, whilst giving people good places to live in, which are accessible on foot, bike and public transport.</p> <p>to direct growth to sustainable locations and prevent the creation of car-dependent developments.</p>	<p>✓ Renewable Energy policy 33. Spatial Strategy. Access policy 59.</p> <p>Spatial Strategy</p>

¹ [Building Better Places: The Planning System delivering Resilient and Brighter Futures - placemaking and the Covid-19 recovery \(gov.wales\)](#)

² Welsh Development Quality Requirements 2021. 'The standard will be applied in full to all publicly-funded affordable housing schemes submitted to Welsh Government at "concept" stage for technical scrutiny from 01 October 2021. New affordable homes delivered through planning agreements (under section 106 of the Town and Country Planning Act 1990) and planning conditions will only be required to meet the Appendix A and Appendix B "space requirements" for agreements entered into after 01 October 2021. We will keep this under regular review.'

<https://gov.wales/sites/default/files/publications/2021-08/development-quality-requirements-for-housing-associations.pdf>

Reference	Relevance for Pembrokeshire Coast National Park	Compatibility with / consider alongside LDP 2 Relevant Policies include... Issues for Plan Review
	directing development away from areas at risk of flooding.	Suite of Policies included in the Plan related to flooding – Policies 34 to 37.
Housing	we must increase housing output by refocussing on building new social housing	✓The LDP has a focus on affordable housing delivery and a strong emphasis on social housing. Increased social housing output would not be an issue. Figures for delivery to date can be found in this AMR.
Community Growing Spaces	by identifying community growing spaces	✓allotments would be supported in principle through our community facilities policies – Policy 54. We wouldn't specifically need to allocate. No specific allotment requests were made through the LDP process.
Town Centres	This means that the role and function of established shopping areas must be reassessed and sometimes difficult decisions about the future of some of these centres will need to be made.	<p>✓This National Park's centres are quite healthy. The 2021 retail survey showed all retail centres looking healthy with Newport having no vacant units and St. Davids showing a decrease in the number of vacant units since 2020. Saundersfoot showed a slight increase in vacant units but the figures did not include the large number of new retail units created on Ocean Square. Tenby also showed an increase in the number of vacant units but many retail units were undergoing redevelopment and some construction work. All centres were busy with shoppers at the time of the survey as lockdown restrictions had eased and both locals and visitors looked to spend money. Vacancy rates in the National Park retail centres all remain well below 10% with all centres showing a decrease in vacancy rates between 2021 and 2022. The financial impacts of the end of furlough and redundancies do not appear to have had an impact in the National Park retail centres.</p> <p>We will monitor the situation to understand where change or flexibility might be needed. There is also a likelihood that whilst some retail</p>

Reference	Relevance for Pembrokeshire Coast National Park	Compatibility with / consider alongside LDP 2 Relevant Policies include... Issues for Plan Review
		elements will shift online, there may be greater local demand for food stores and independent retail shops with a unique retail offer.
Telecommunications:	Planning applications for new digital infrastructure should be recognised as essential to the Covid-19 recovery period and should be given priority for determination by planning authorities.	✓The Local Development Plan an enabling policy for telecommunications balanced against protection of the National Park landscape – Policy 63.
Employment	Economic forecasts will need to be re-examined to ensure that the supply of land for employment uses is adequate and fit for the future, taking into account the need for a choice of sites.	✓A review of the 2019 Two County Economic Study covering Pembrokeshire and Carmarthenshire has been undertaken by ARUP in 2021 to 'test' the relevance and scale of change for each of interventions and strategic site recommendations presented in the 2019 Study. The conclusion is that the overarching themes of the 2019 study remain relevant, although the Covid 19 pandemic and Brexit has brought some challenges and uncertainties that may only be seen in the medium to long term. The main strategic sites requirement will be located across the two counties, outside of the National Park. The updated study will provide part of the evidence base for both Pembrokeshire and Carmarthenshire County Councils as they are currently preparing replacement Local Development Plans. This will have limited effect on this National Park as our employment policies are criteria based rather than through identifying specific sites. The consequences of the Covid pandemic and the resulting 'staycationing' effect has increased demand for tourism accommodation and activities. There has been some evidence of people moving to the area, now able to take advantage of improved working from home capabilities.

Appendix 6 Marine Plan¹ – Parts relevant to the Pembrokeshire Coast National Park

Marine Plan Reference	Relevance for Pembrokeshire Coast National Park	Compatibility with /consider alongside LDP 2 Relevant Policies include... Issues for Plan Review highlighted in blue.
What is this document?	<p>The WNMP Plan, and its policies, apply to all decisions with the potential to affect the marine plan area.</p> <p>The boundary of the marine plan area is at the mean highwater spring tide mark which can extend far upriver from the coast.</p> <p>Activities and developments on land, both near and far from the coast, can affect and be affected by the marine environment.</p> <p>The Wales National Marine Plan could, therefore, be a consideration for land-based planning applications and, when relevant, Local Planning Authorities will apply marine planning policy in their decision making.</p> <p>The Welsh Government website provides a guide as to those policies that are most likely to be of relevance.²</p> <p>The level of consideration given to marine planning policy will depend on the likely significance of the development to the marine area.</p> <p>For smaller projects and/or those further away from the coast, it is likely that marine planning policy will be less relevant or can take a 'lighter touch' approach.</p>	<p>Local Development Plan 2 was considered through Examination prior to the Marine Plan being finalised (12 November 2019.)</p> <p>Reference will need to be made in the Introduction to the Local Development Plan, when updating at Review stage.</p>
SOC_01: Access to the marine environment.	<p>SOC_01: Access to the marine environment³</p> <p>Proposals that maintain or enhance access to the marine environment are encouraged.</p>	<p><input checked="" type="checkbox"/></p> <p>Policy 8 Special Qualities requires protection of the undeveloped coast.</p> <p>Policy 17 Shore based Facilities allows for shore based facilities including those linked to proposals below the mean low water in appropriate locations and where compatible with neighbouring land uses. Policy 18 is specific to Porthgain, Saundersfoot, Solva and Tenby</p>

¹ https://gov.wales/sites/default/files/publications/2019-11/welsh-national-marine-plan-document_0.pdf

² <https://gov.wales/sites/default/files/publications/2021-01/considering-marine-plans-terrestrial-planning-permission-infographic.pdf>

³ Starts page 28 of the Marine Plan

		Harbours in helping to sustain and enhance harbour activities.
Supporting TextSpecifically, where possible and appropriate, developments should be designed and managed in a way that facilitates inclusive access, or does not constrain current access, to the marine environment. Equally, public authorities should support access to the marine environment where possible and appropriate, while also considering the risks and potential adverse impacts of enhanced access in some cases.	<input checked="" type="checkbox"/> See commentary directly above.
SOC_03: Marine pollution incidents.	SOC_03: Marine pollution incidents ⁴ Proposals should demonstrate how they minimise their risk of causing or contributing to marine pollution incidents.	<input checked="" type="checkbox"/> Policy 29 Sustainable Design will be the key strategic policy here.
Supporting Text	Under this policy, proposals should consider their inherent risks of causing or contributing to a major incident and act to address these risks where possible, therefore reducing the overall risk of marine pollution incidents in the marine plan area.	<input checked="" type="checkbox"/> See commentary directly above.
SOC_08: Resilience to coastal change and flooding.	SOC_08: Resilience to coastal change and flooding. ⁵ Proposals should demonstrate how they are resilient to coastal change and flooding over their lifetime.	<input checked="" type="checkbox"/> Policy 34 Flooding and Coastal Inundation and supporting policies on Coastal Change Management (Policy 35,36, 37) are compatible.
Supporting Text	Due to the risks of coastal change and flooding, coastal development should preferably be sited in areas less vulnerable to flooding and erosion, although there may be exceptions if a specific location is essential for operational reasons or infrastructure cannot be located elsewhere. In line with SMP policy, proposals to develop areas at risk of flooding/erosion and with a 'no active intervention' or 'managed alignment' policy in the SMP for any epoch relevant to the lifetime of the development should not be permitted. Equally, areas at high risk from flooding should not be developed (Technical Advice Note (TAN) 15).	<input checked="" type="checkbox"/> See commentary directly above.
ENV_04: Marine litter	ENV_04: Marine litter ⁶ Proposals should demonstrate how they: <ul style="list-style-type: none"> • avoid the deliberate introduction of litter into the marine plan area; and • minimise the risk of accidental release of litter. 	<input checked="" type="checkbox"/> Policy 31 Minimising Waste Environmental Impact Assessment: Environmental impact assessments (EIA) to be undertaken for






⁴ Starts page 32 of the Marine Plan

















⁵ Starts page 38 of the Marine Plan

⁶ Starts page 54 of the Marine Plan

		“proposed activities that are likely to have a significant adverse impact on the environment.’
ENV_06: Air and water quality	<p>ENV_06: Air and water quality⁷</p> <p>Proposals should demonstrate that they have considered their potential air and water quality impacts and should, in order of preference:</p> <ul style="list-style-type: none"> a. avoid adverse impacts; and/or b. minimise adverse impacts where they cannot be avoided; and/or c. mitigate adverse impacts where they cannot be minimised. <p>If significant adverse impacts cannot be avoided, minimised or mitigated, proposals must present a clear and convincing case for proceeding.</p>	<p>☑</p> <p>Policy 29 Sustainable Design</p> <p>32 Surface Water Drainage</p>

⁷ Starts page 56 of the Marine Plan















Status	Count	October 2022	Appendix 7 Annual Monitoring Report Supplementary Planning Guidance ¹
Adopted	7		
Consultation	6 ²		
Being drafted/redrafted	5		
Interim/rolled over	9		
Later/Stalled	3		

Title	Current Status – Annual Monitoring Report 2022	Status
Affordable Housing	Interim Supplementary Planning Guidance Local Development Plan 2 – September 2020 (with PCC) Preparing joint with PCC for LDP2 alongside an Affordable Housing Strategy for Pembrokeshire.	 
Archaeology	Adopted May 2021 (with PCC)	
Biodiversity	Adopted May 2021 (with PCC)	
Caravan, Camping and Chalet	Adopted May 2021	
Coal Works – Instability	Interim Supplementary Planning Guidance Local Development Plan 2 – September 2020 Consultation Draft Sept 2021 Closing date mid-April 2022. Reporting to NPA October 2022.	 
Conservation Areas ³	Consultation Draft Sept 2021 Closing date mid-April 2022 Reporting to NPA October 2022.	
Landscape	Adopted June 2011 Interim Supplementary Planning Guidance Local Development Plan 2 – September 2020 Implementing Interim Guidance until LANDMAP updates received.	 
Lighting	New - Lighting commission underway July 2022. To be completed by April 2022 Research undertaken will inform drafting of the Guidance.	
Loss of Community Facilities	New - clarification needed as to the role of the Guidance.	
Loss of Hotels	Interim Supplementary Planning Guidance Local Development Plan 2 – September 2020 Closing date mid-April 2022	 
Parking	Adopted May 2021	
Planning Obligations	Interim Supplementary Planning Guidance Local Development Plan 2 –September 2020 (with PCC) Review will be led by Pembrokeshire County Council	

¹ Local Development Plan 2 was adopted after its target date (Spring 2021) due primarily to Covid restrictions. The indicative timetable for Supplementary Planning Guidance preparation was consequently delayed.

² Includes 13 Conservation Area documents

³ Angle, Caerfarchell, Caldey Island, Little Haven, Manorbier, Newport and Newport Parrog, Portclew, Porthgain, Saundersfoot, Solva, St David's Trefin, Tenby.

Title	Current Status – Annual Monitoring Report 2022	Status
Recreation	Very little management of damaging activities can be achieved through land use planning. The potential role of supplementary planning guidance will continue to be explored.	
Regionally Important Geodiversity Sites	Interim Supplementary Planning Guidance Local Development Plan 2 – September 2020 Consultation Draft Sept 2021 Consultation Draft Sept 2021 - Closing date mid-April 2022. Reporting to NPA October 2022.	 
Renewable Energy	Adopted May 2021	
Safeguarding Mineral Zones	Interim Supplementary Planning Guidance Local Development Plan 2 – September 2020 Consultation Draft Sept 2021 - Closing date mid-April 2022. Reporting to NPA October 2022.	 
Seascape Character	Interim Supplementary Planning Guidance Local Development Plan 2 – September 2020 with PCC). Reporting draft to NPA October 22	 
Shopfront Design		
Sustainable Design & Development⁴	Adopted May 2021	
The Cumulative Impact of Wind Turbines	Interim Supplementary Planning Guidance Local Development Plan 2 – September 2020 Consultation Draft Sept 2021 (with PCC) -Closing date mid-April 2022. Reporting to NPA October 2022.	 
Place Plans: – Community Land Trust	Adopted May 2021	
Tree and Woodland Guidance	Reporting draft to NPA October 22	

⁴ Amalgamates Siting and Design of Farm Buildings and Sustainable Design