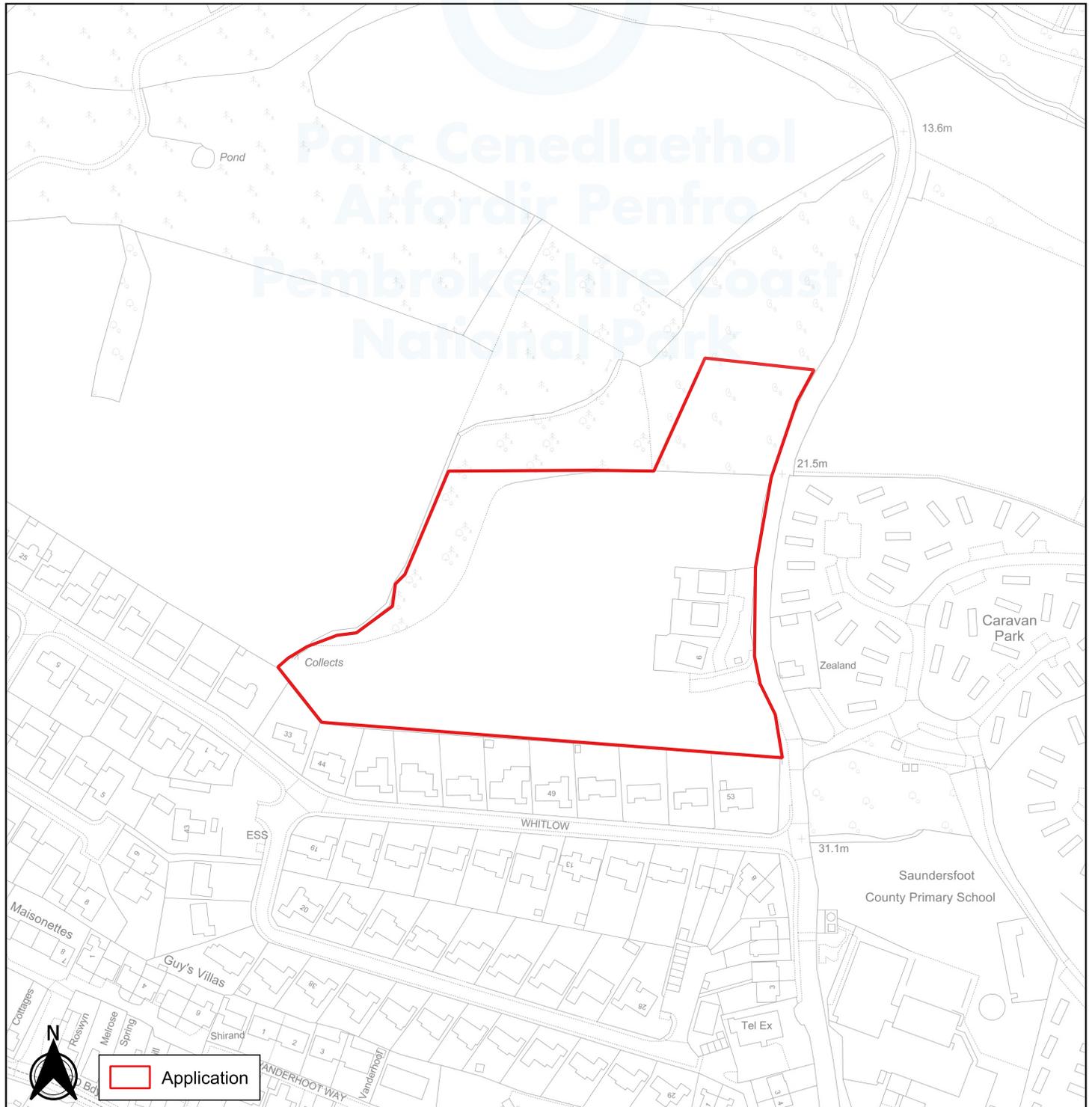
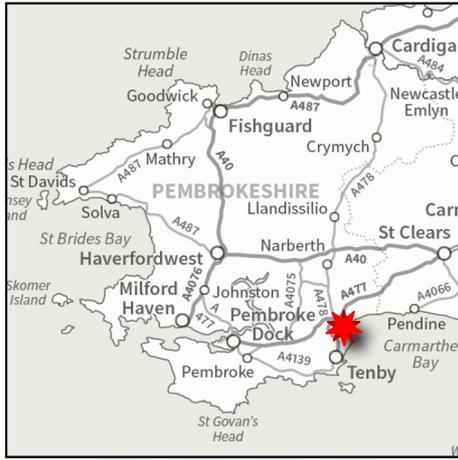




Parc Cenedlaethol
Arfordir Penfro
Pembrokeshire Coast
National Park

Graddfa/Scale: 1:2,500





PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY COMMITTEE REPORT

Ref No: NP/25/0614/FUL

Proposal: The proposed reconfiguration of part of the site layout and substitution of approved residential apartments with dwellinghouse types (known as Phase 3) upon a partly completed residential development (granted planning permission under reference NP/23/0168/FUL).

Site Location: Land north of Whitlow, Narberth Road, Saundersfoot, Pembrokeshire, SA69 9BE

Recommendation: **Approve**, subject to conditions

Summary:

The application is being brought to the Development Management Committee in accordance with the scheme of delegation as the Director with responsibility for planning considers that it generates matters of Member and/or public interest.

The application site (Phase 3) comprises part of a part-built housing development in a parcel of land immediately north of Whitlow residential estate within Saundersfoot. The overall site is irregularly shaped and has ground levels that fall away from the adjacent housing estate and the adjacent B4316 access road. An existing estate access is located within the southeast corner of the site, and a further field access into the adjoining field to the west is provided within the southwest corner of the site.

Phase 3 involves the proposed reconfiguration of part of the layout and substitution of approved residential apartments with dwellinghouse types within a partly completed residential development, resulting in a reduction in dwellings from 54 to 47 (granted planning permission under reference NP/23/0168/FUL).

Following consideration of the policies contained within the statutory Development Plan (Future Wales and Local Development Plan 2) and National Planning Policy in the form of Planning Policy Wales (Edition 12), and having regard to all material considerations, it is considered that subject to conditions and a section 106 planning obligation, the development will be in accord with the Development Plan and the development is considered to provide a development which is acceptable in principle and can be supported by officers.

In reaching a recommendation, regard has been given to the requirements of sections 3 and 5 of the *Well Being of Future Generations (Wales) Act 2015*. It is considered that this recommendation is in accordance with the Act's sustainable development principle through its contribution towards the Welsh Ministers' well-being objective of supporting safe, cohesive and resilient communities.

Consultee Response

- Saundersfoot Community Council: No response received at the time of writing this report
- Western Power Distribution: No response received at the time of writing this report
- Wales and West Utilities: No response received at the time of writing this report

- PCC Drainage Engineers: No response received at the time of writing this report
- PCC Transportation and Environment: Conditional consent
- Dwr Cymru Welsh Water: Conditional consent
- PCC Housing: No response received at the time of writing this report
- Mining Remediation Authority: No objection
- Natural Resources Wales: No objection
- Cadw: No response received at the time of writing this report
- PCNPA Ecology Team: Conditional consent

Public Response

A site notice and neighbour notification letters were posted in accordance with the requirements of the *Town and Country Planning (Development Management Procedure) (Wales) Order 2012*.

No representations have been received.

Policies considered

Development Plans

All planning applications in Wales need to be determined in accordance with the statutory Development Plan:

Future Wales: The National Plan 2040 [Future Wales: The National Plan 2040](#) (FW)

Local Development Plan 2 (Adopted September 2020)

Within the Pembrokeshire Coast National Park, the Local Development Plan 2 (LDP2) is also a relevant development plan, with the following Policies applicable to this proposal.

- Policy 01 (National Park Purposes and Duty)
- Policy 04 (Saundersfoot Local Centre)
- Policy 08 (Special Qualities)
- Policy 09 (Light Pollution)
- Policy 11 (Nationally Protected Sites and Species)
- Policy 14 (Conservation of the Pembrokeshire Coast National Park)
- Policy 29 (Sustainable Design)
- Policy 30 (Amenity)
- Policy 32 (Surface Water Drainage)
- Policy 46 (Housing)
- Policy 47 (Housing Allocations or Land with Planning Permission)
- Policy 48 (Affordable Housing)
- Policy 50 (Housing Development Proposal)
- Policy 51 (Housing Densities)
- Policy 52 (Housing Mix)
- Policy 59 (Sustainable Transport)
- Policy 60 (Impacts of traffic)

These policies can be viewed on the Policies page of the Pembrokeshire Coast National Park website: <https://www.pembrokeshirecoast.wales/wp-content/uploads/2024/01/LDP-Text-for-Adoption-Web.pdf>

Planning Policy Wales (PPW12)

PPW12 sets out the Welsh Government's land-use planning policies.

The primary objective of PPW12 is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation and resultant duties such as the Socio-economic Duty.

- [Planning Policy Wales 12](#) (PPW12).

Technical Advice Notes

The Future Wales Plan should be seen and read as a whole, and in conjunction with National planning policy in the form of Planning Policy Wales (Edition 12, February 2024) as well as considering the following Welsh Government Technical Advice Notes (TAN's)

www.gov.wales/technical-advice-notes:

- TAN 02 – Affordable Housing
- TAN 05 – Nature Conservation and Planning
- TAN 06 – Planning for Sustainable Rural Communities
- TAN 08 – Renewable Energy
- TAN 12 - Design
- TAN 15 – Development, flooding and coastal erosion (2025)
- TAN 18 – Transport
- TAN 24 – The Historic Environment

LDP2 Supplementary Planning Guidance

In addition, the Authority produces Supplementary Planning Guidance (SPG) on various topics, which may be material considerations in the determination of any future application.

In respect of the proposal, the most relevant SPGs are: [Supplementary Planning Guidance \(LDP2\) - Pembrokeshire Coast National Park](#)

- SPG - Biodiversity
- SPG – Coal Works – Instability
- SPG – Parking Standards
- SPG - Landscape
- SPG - Seascapes
- SPG - Sustainable Design and Development
- SPG – Affordable Housing
- SPG – Planning Obligations

Constraints

- Special Area of Conservation - within 500m
- LDP Allocation
- Biodiversity Issue
- Rights of Way Inland - within 50m
- Ancient Monument - within 500m
- Potential for surface water flooding
- Recreation Character Areas
- Low Coal Risk
- Surface Coal

- High Coal Risk
- Affordable Housing Submarkets
- Seascape Character Areas
- Landscape Character Area
- LDP Centre Boundary
- Tree Preservation Orders - within 10m

Officer's Appraisal

1. Site and Proposed Development

The Phase 3 site comprises part of a part-built housing development in a parcel of land immediately north of Whitlow residential estate within Saundersfoot. The overall site is irregularly shaped and has ground levels that fall away from the adjacent housing estate and the adjacent B4316 access road. An existing estate access is located within the southeast corner of the site, and a further field access into the adjoining field to the west is provided within the southwest corner of the site. Phase 3 forms part of the centre of the overall site and is stepped in levels from south down to the north.

The proposal comprises:

The proposed reconfiguration of part of the site layout (Phase 3) and substitution of approved residential apartments with dwellinghouse types (known as Phase 3) upon a partly completed residential development (granted planning permission under reference NP/23/0168/FUL).

2. Relevant Planning History

- NP/23/0168/FUL – Construction of 54 no. dwellinghouses and residential apartments, with the formation of estate roads and associated infrastructure – Approved 09/02/2024
- NP/24/0108/DOC – Discharge of condition No. 20 of NP/23/0168/FUL - External Lighting Scheme – Discharged 15/04/2024
- NP/24/0109/DOC – Discharge condition No's 5, 14 & 22 of NP/23/0168/FUL - Scheme of Intrusive Site Investigations Report, Surface Water Disposal Scheme & C3 Use Apartments Plan - Discharged 15/04/2024
- NP/24/0450/TPO – T45 - Oak - Remove major dead wood (action exempt from order); T48 - Oak - 4-5m reduction of laterals growing over caravans; T50 - Oak - Reduce crown by 30% to alleviate stress on stem; A70 - Ash - Remove Faulted Upper Limb; A71- Ash - Fell - 11 Ash stems; A76 - Ash - Fell 2 Ash stems; G6 - Ash - Fell 16 Ash stems – Approved 08/10/2024
- NP/24/0534/DOC – Discharge conditions 7 (construct new access arrangement, footways & internal estate road), 11 (internal estate road & footways complete to base course level) & 23 (Broadband) of NP/23/0168/FUL – Discharged 08/12/2024
- NP/24/0635/DOC – Discharge of condition No. 9 of NP/23/0168/FUL - Extension of the 30 mph speed limit northwards upon the B4316 Narberth Road – Discharged 20/01/2025
- NP/24/0657/S73 - To effectively remove Condition 13 relating to a provision for ULEV charging points, and vary the requirements of Condition 12 to only provide

for secure cycle storage at Affordable Units at Plots 14-32 only – Currently being considered by officers

- NP/25/0010/S73 – Construction of 54 no dwellinghouses & residential apartments, estate road & associated Infrastructure - Variation of condition No's 8 & 17 of NP/23/0168/FUL – Approved 02/03/2025
- NP/25/0157/DOC – Discharge of condition No. 6 of NP/23/0168/FUL - Coal Mining Risk Validation Report – Discharged 06/05/2025
- NP/25/0471/NMA – Non-material amendment to Construction of 54 dwellinghouses & residential apartments with formation of estate roads and associated infrastructure - proposed detached single garage & extended patio area within curtilage of Plot 13 (partly retrospective) – Withdrawn 06/10/2025
- NP/25/0476/DOC – Discharge of condition No. 18 of NP/23/0168/FUL – Arboricultural Supervision Schedule – Partial discharge 09/10/2025
- NP/25/0585/S73 – Variation of Condition No. 2 of NP/23/0168 to revise plots 33 to 44 with a reconfigured Site layout & substitution of approved residential apartments with dwellinghouse types (known as Phase 3) – Cancelled
- NP/26/0066/S73 - Variation of condition No. 2 of NP/23/0168/FUL to include a proposed detached garage within the curtilage of plot 13 (partly in retrospect) - Currently being considered by officers

3. **Key Issues**

The application raises the following planning matters:

- 3.1 Policy and Principle of Development
- 3.2 Siting, Design, and Impact upon the Special Qualities of the National Park
- 3.3 Amenity and Privacy
- 3.4 Biodiversity, Protected Sites, Green Infrastructure & Landscaping
- 3.5 Access and Parking
- 3.6 Surface Water Drainage
- 3.7 Other Matters

3.1 **Policy and Principle of Development**

1. Section 38 of *The Planning and Compulsory Purchase Act 2004* requires that, in determining a planning application, the determination must be in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the National Park comprises Future Wales - The National Plan 2040 (FW) and the Local Development Plan 2 (LDP2).
2. Future Wales – The National Plan 2040 (FW) was adopted on 24th February 2021 and is the National Development Framework for Wales, and the national tier of the Development Plan. Policy 4 (Supporting Rural Communities) states that Strategic and Local Development Plans must identify their rural communities, assess their needs, and set out policies to support them. On page 104, Future Wales states that: '*National Park Authorities are unique planning entities with a specific remit to reflect the distinctive characteristics of their areas...and that Future Wales policies respect the functions of National Parks in terms of their statutory purposes...'*
3. The primary objective of PPW12 is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic,

environmental, and cultural well-being of Wales, as required by the *Planning (Wales) Act 2015*, the *Well-being of Future Generations (Wales) Act 2015* and other key legislation and resultant duties such as the Socio-economic Duty.

4. A well-functioning planning system is fundamental for sustainable development and achieving sustainable places. PPW12 promotes action at all levels of the planning process, which is conducive to maximising its contribution to the well-being of Wales and its communities.
5. The Phase 3 site lies within the Centre boundary of Saundersfoot Local Centre as defined by Local Development Plan 2. Policy 4 of the Plan sets out the land use priorities for Saundersfoot and includes providing for and permitting housing to facilitate the delivery of the affordable housing needs of the local area and to ensure that developments permitted contribute to the protection and enhancement of the village's special qualities.
6. The overall site is allocated for residential development under Policy 47 of the Plan and is identified as HA3 on the Proposals Map. As such, the principle of residential development on this site is established. Policy 47 identifies the site as having an estimated 54 dwellings in total, with 19 of those being affordable units (35%).
7. Planning permission was granted under NP/23/0168/FUL for 54 dwellings. The overall site is partially completed with Phase 1 of the development comprising the 16 market dwellings and Phase 2, 19 affordable dwellings and Phase 3 for a further 19 market dwellings.
8. This application seeks to change the site layout and dwellinghouse types for the remainder of the development, referred to as Phase 3. Permission is for 19 no. 1 and 2-bed apartments, located in the middle of the development site. The proposal is to change the housing types to 2 3-bed detached houses, 3 no. 2-bed detached bungalows, 4 no. 2-bed terraced townhouses and 3 no. 3-bed terraced townhouses. The proposed housing mix would reduce the housing numbers of Phase 3 from 19 apartments to 12 houses and the overall housing numbers of the site from 54 to 47. The number of affordable dwellings is not proposed to change; therefore, the reduction in the number of market housing units would result in a higher percentage of affordable dwellings on site (35.1% increasing to 40.4%).
9. Policy 51 (Housing Densities) states that residential development proposals will be permitted where the residential density is at least 30 dwellings per hectare. Lower density levels will only be permitted where it can be demonstrated that a) development at the prescribed densities would have an unacceptable adverse effect on the character of the surrounding area; or b) reduced densities are required as a result of significant site constraints or to preserve a feature that would contribute to existing or future local amenity.
10. The applicants have submitted evidence to demonstrate that there has been very limited demand for the consented 19 no. apartments, due in part to the considerable supply of such properties already available in the lower area, and the demand for homes suitable for young families or for the older population to

downsize into smaller, low-maintenance bungalows. In addition, the applicants have indicated that the lack of demand for the proposed apartments may result in Phase 3 being held in abeyance, leaving future residents inhabiting a partially completed site. It is therefore considered that the proposal would comply with criterion b) of Policy 51, and the reduced density can be supported in this instance.

11. Policy 52 (Housing Mix) states that in order to ensure the creation of balanced communities, all new housing development will be required to include a mix of dwellings sizes, types and tenures having regard to the current evidence of housing need in the National Park. It is considered that the proposed change of dwelling types would result in a development that offers a range of dwelling sizes, types and tenures suitable for both young families and the older population seeking to downsize, and therefore the proposal satisfies the requirements of Policy 52.
12. The consent granted under NP/23/0168/FUL placed a requirement for 71% of the open market apartments (13 no. apartments) to have a C3 occupancy restriction condition applied to ensure that these could only be occupied as sole or main residences only and could not be occupied as second homes (C5) or short-term holiday lets (C6). This was due to the prevalence of such properties in Saundersfoot, which were occupied for C5 or C6 use. An updated assessment has been carried out of the proposed revised dwelling types: detached houses, bungalows, and terraced townhouses. The analysis has shown a lower prevalence of detached, semi-detached and terraced houses being occupied as second homes and holiday lets, and therefore it is considered that there is limited justification for imposing a C3 occupancy restriction on the proposed dwellings. A full C3 assessment is appended to this report.
13. Officers consider that the proposal to substitute the consented 19 no. apartments with 12 no. detached and semi-detached houses, bungalows, and terraced townhouses are acceptable, in principle, and accords with the relevant policies of LDP2.

3.2 Siting, Design, and Impact upon the Special Qualities of the National Park

14. Policy 08 (Special Qualities) of LDP2, is a strategy policy which refers to the special qualities of the National Park and lists priorities to ensure that these qualities will be protected and enhanced. These qualities are characteristics and features which individually or in combination contribute to making the National Park unique.
15. Policy 14 (Conservation of the Pembrokeshire Coast National Park) of LDP2 seeks the conservation of the Pembrokeshire Coast National Park, resisting development that would cause significant visual intrusion, be insensitively or unsympathetically sited within the landscape, and/or fail to harmonise with, or enhance the landform and landscape character of the National Park.
16. Policy 29 (Sustainable Design) of LDP2 requires all development proposals to be well designed in terms of place and local distinctiveness.
17. The proposal was subject to pre-application advice, and officers have worked with the agent and applicant to undertake several design and layout changes to make the

proposal more acceptable in planning terms within the overall site. The current application proposes a redesign of the development previously approved as phase 3, including a change from apartments to a mix of houses and bungalows, whilst reducing overall numbers on the site. The proposed siting of the works within Phase 3 is considered acceptable, as the proposal has a scale, form, mass, and design that are in keeping with the development already built out in phases 1 & 2 of the residential site and with other adjacent development in this area of Saundersfoot.

18. The proposal will provide new residential accommodation which incorporates sustainable design principles within Phase 3 and is therefore considered to be in accordance with policies 8, 14 and 29 of LDP2.

3.3 Amenity and Privacy

19. Policy 30 (Amenity) of LDP2 seeks to protect the amenity of people living in the National Park and states that development will not be permitted where it has an unacceptable adverse effect on amenity, particularly where:
 - a) the development would have a detrimental impact on the quality of the environment currently enjoyed by people living, working or visiting the Park; and/or
 - b) the development is of a scale incompatible with its surroundings; and/or
 - c) the development leads to an increase in traffic or noise or odour or light which has a significant adverse effect; and/or
 - d) the development is visually intrusive.

Policy 30 (Amenity) supports Policy 14 (Conservation of the Pembrokeshire Coast National Park) in not allowing development that creates a visual intrusion.

20. The overall site is surrounded by residential properties to the south and a caravan site to the east, with woodland and agricultural fields remaining to the north and west.
21. A condition relating to the operation times and deliveries for the development has been applied previously to other applications within this overall site, and officers consider it is necessary to ensure an appropriate level of amenity is maintained during the construction phases. As such, a condition will be imposed to ensure all works are carried out on site within the hours of 0730 to 1800 hours Monday to Saturday and no deliveries before 0800 hours Monday to Saturday, and no work to be carried out on Sundays or Bank Holidays.
22. Given the nature of the current proposal, its location within the centre of an existing residential estate currently in the process of being built out, it is considered that the privacy and amenity of any nearby neighbours will not be adversely affected in this instance, and the application will accord with Policy 30 of LDP2.

3.4 Biodiversity, Green Infrastructure & Landscaping and Protected Sites

Biodiversity Impacts

23. PW12, TAN5 and Policy 11 (Nationally Protected Sites and Species) of LDP2 require biodiversity considerations to be taken into account in determining individual applications.
24. Natural Resources Wales (NRW) has indicated that they have no objection to the current proposal based on the amended phase 3 scheme. They also advise the

applicant in their duty to secure all other permits/consent/licences, and an informative note will be added to any consent to cover this aspect.

Net Benefit for Biodiversity and Green Infrastructure

25. To comply with Planning Policy Wales 12 (2024) and the *Environment (Wales) Act 2016*, planning authorities are expected to ensure every development positively contributes to biodiversity and that overall there is a net benefit for biodiversity and ecosystem resilience, resulting in enhanced well-being.
26. Chapter 6 of Planning Policy Wales 12 states that green infrastructure plays a fundamental role in shaping places and our sense of well-being, and is intrinsic to the quality of the spaces we live, work and play in.
27. It also states that a green infrastructure statement should be submitted with all planning applications and that the Green Infrastructure Statement (GIS) will be an effective way of demonstrating positive multi-functional outcomes, which are appropriate to the site in question, and must be used for demonstrating how the stepwise approach has been applied.
28. A GIS hasn't been submitted in support of the application at the time of writing this report, but has been requested. A further verbal report on this aspect will be given to members at the meeting.
29. Notwithstanding the current lack of a GIS being submitted, the ecologist indicates that units 38-41 within the development only contain 1 biodiversity enhancement between them in the form of an insect hotel. The Authority would expect at least one biodiversity enhancement per unit on this site. The Ecologist recommends that in-built bird bricks be added to the northern elevations of these units using either in-built swift bricks or sparrow terraces, as multiple units can be installed in close proximity to one another. A planning condition is imposed to secure these requirements.

Protected Sites

30. The application site is within 500m of the Carmarthen Bay and Estuaries Special Area of Conservation (SAC) and is adjacent to a watercourse. As a competent authority under Regulation 63 of the Conservation of Habitats and Species Regulations 2017, the authority has to consider the impact of development on the features for which the aforementioned sites are designated. There is no likely significant effect on the nearby SAC and an Appropriate Assessment is not required.
31. A Construction Environment Management Plan will be requested, but this is a standard condition of consent for works adjacent to a waterway, regardless of designation and not considered a specific measure to protect any features of the SAC. Due to the site's proximity to a sensitive ecological feature, a Construction Environment Management Plan (CEMP) will be required.
32. Based on the above considerations and subject to the submission of an appropriate GIS, the proposal would accord with Policies 10 and 11 of LDP2 and compliance with

the requirements of the Environment Act (Wales) 2016, the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017.

3.5 Access and Parking

33. Policy 59 (Sustainable Transport) of LDP2 is a strategic policy that ensures opportunities are taken to improve and promote sustainable travel choices and reduce the need to travel by car by permitting proposals that assist in delivering improved traffic and parking management.
34. Additionally, Policy 60 (Impacts of traffic) of LDP2 permits development where appropriate access can be achieved.
35. The County Highway Authority (CHA) has been consulted on the reconfiguration of Phase 3 of a residential development that previously received planning permission under reference NP/23/0168/FUL. Phase 3 was originally approved for 19 apartments accessed from an estate road and a cul-de-sac–style shared driveway. The revised proposal omits the approved apartments and instead proposes a mix of 12 two- and three-bedroom dwelling houses, including bungalows.
36. The proposed General Arrangement Plan (DWG No. 23190-HYD-EX-XX-DR-C-2110-P06) indicates that the internal road will be constructed to adoptable standards, comprising a 5.5m-wide carriageway with a minimum 1.0m service verge.
37. The proposed Block Plan (DWG No. R548-P-02L) demonstrates that each dwelling will be provided with two dedicated parking spaces, which accords with the PCNPA Supplementary Planning Guidance: Parking Standards (May 2021). In addition, the provision of two visitor parking spaces is shown; this is welcomed and will help prevent injudicious parking within the cul-de-sac.
38. The CHA notes that the submitted plans do not include provision for secure and safe cycle storage (with the exception of the single dwelling benefiting from a garage), nor do they show the provision of ultra-low emission vehicle (ULEV) charging points, both of which were requested as part of the original planning permission. These measures will again be required, and suitable conditions will be imposed to ensure these features are secured.
39. The CHA confirm that the proposed amendments will not have a detrimental impact on the existing access arrangements or the local highway network. However, for clarity and continuity, the relevant recommended highway conditions from the original consent should be reapplied to any subsequent approval.
40. Officers consider the estate roads and accesses within Phase 3 have been logically and coherently designed so as to interrelate well with the remainder of the development, so both can co-exist. As such, the proposal accords with Policies 59 and 60 of LDP2.

3.6 Surface Water Drainage

41. Policy 32 (Surface Water Drainage) of LDP2 requires that development will be required to incorporate sustainable drainage systems for the disposal of surface water on site. This is to minimise adverse environmental impacts during construction and upon completion.
42. Dwr Cymru Welsh Water (DCWW) have no objection to the reconfiguration of part of the site layout and substitution of approved residential apartments with dwellinghouse types. DCWW respectfully request that any drainage-related conditions be maintained on any new consent granted for the development. As such, the previous drainage conditions imposed on NP/23/0168/FUL will be reimposed on any consent granted.
43. In respect of a suitable water supply to the proposed development, DCWW has requested that the developers contact them directly to discuss the specific requirements on this aspect, and an informative note will be added to any consent granted.
44. No response from PCC Drainage Engineers has been received at the time of writing this report. However, the overall site was previously subject to a SAB consent. As such, a further verbal report will be given to Members at the committee meeting to consider the scheme and its appropriateness in terms of Policy 32 of LDP2 and TAN 15.

3.7 Other Matters

45. A Coal Mining Risk Assessment does not accompany this planning application. However, under the previous application, reference NP/23/0168/FUL, methods to control the risks associated with past coal mining activities were approved and implemented on site under Conditions 5 and 6. The information supporting the discharge of condition applications confirmed that the site was safe and stable with regard to the coal mining legacy. Consequently, the Coal Authority has no objections to this planning application.
46. *Impact on Scheduled Monuments:*
The overall site lies some 430 metres to the north east of the Tramroad Incline at Saundersfoot (PE479), which is a Scheduled Ancient Monument. Cadw has been consulted as part of the application process and has not responded to date. Officers consider that, given the intervening level of landscaping and built form between the Phase 3 site and the site of the monument, there will be no intervisibility and therefore no adverse impact from the proposed development on the existing monument's setting.
47. *Affordable Housing and Planning Obligations*
The planning application NP/23/0168/FUL was subject to a Section 106 Legal Agreement that sought to secure 19 affordable housing units on the site and several planning contributions.

The triggers imposed on the existing legal agreement are set out below:

- 1.1 Prior to the commencement of the Open Market Unit to transfer the Affordable Housing Land to the PCNPA (or any Registered Social Landlord nominated by the PCNPA)
- 1.2 There shall be no Commencement of the Open Market Housing Unit until the Owners or the Developer, as appropriate, has transferred the Affordable Housing Land to the PCNPA (or any Registered Social Landlord nominated by the PCNPA)
- 1.3 Construction cannot commence on the 18th Open Market Dwelling (equivalent of 50% of the Open Market Dwellinghouses) until the Affordable Units constructed on the Affordable Housing Land have been fully completed in accordance with the Planning Permission and transferred to the RSL
- 1.4 Not to Occupy or allow Occupation of more than 18 of the Open Market Housing Units (equivalent of 50% of the Open Market Units) until such time as the Developer has paid the following financial contributions to the Council
 - Library Services - £2,407.32p
 - Recreational Open Space - £25,000.00p
 - Sustainable Transport Facilities in the form of:
 - Bus Stop and Bus Infrastructure - £5,000.00p
 - Active Travel - £70,175.00p

At the time of writing this report, no triggers were met in relation to the affordable housing or financial contributions on the previous planning consent NP/23/0168/FUL; therefore, officers consider that a new S106 Legal Agreement is required to ensure that any dwellings built pursuant to this permission trigger the above obligations. Any new legal agreement will need to replicate the controls imposed on the previous legal agreement and this can be done by ensuring that triggers are enforceable on the basis of cumulative development of the site through both this application and NP/23/0168/FUL.

4. Conclusion

48. Following consideration of the policies contained within the statutory Development Plan (Future Wales and Local Development Plan 2) and National Planning Policy in the form of Planning Policy Wales (Edition 12), and having regard to all material considerations, it is considered that subject to appropriate planning conditions and the provision of a section 106 legal agreement to deliver planning obligations, the Phase 3 development will accord with LDP2, and the development is considered to provide a development which is acceptable in principle and can be supported by officers.
49. In reaching a recommendation, regard has been given to the requirements of sections 3 and 5 of the *Well Being of Future Generations (Wales) Act 2015*. It is considered that this recommendation is in accordance with the Act's sustainable development principle

through its contribution towards the Welsh Ministers' well-being objective of supporting safe, cohesive and resilient communities.

5. **Recommendation**

For the application to be delegated to the Chief Executive, Director of Planning or to the Team Leader to issue permission upon receipt of a completed legal agreement to cover the planning obligations, including affordable housing delivery, its retention in perpetuity and the financial contributions towards Library Services, Recreational Open Space and Sustainable Transport and subject to the conditions set out below. If no completed legal agreement is received within 3 months, officers would request that a delegation be granted to refuse the application due to a lack of a mechanism for securing planning obligations and affordable housing in accordance with Policies 48 and 55 of LDP2.

Suggested conditions

1. The development shall begin no later than five years from the date of this decision.
Reason: Required to be imposed pursuant to Section 91 (1) of the *Town and Country Planning Act 1990* (as amended).
2. The development shall be carried out in accordance with the following approved plans and documents:
 - RS230324-02-001 Landscape + Ecological Enhancement Plan (Received 30/10/2025)
 - RS230206-01-001 Landscape Scheme Design (Received 30/10/2025)
 - 23190-HYD-EX-XX-DR-C-2110 Rev P06 S38-S278 General Arrangement (Received 30/10/2025)
 - 23190-HYD-EX-XX-DR-C-2117 Rev P06 S38-S278 Surfacing + Kerbing Plan (Received 30/10/2025)
 - 23190-HYD-EX-XX-DR-C-3101 Rev P07 S104 Drainage Layout (Received 30/10/2025)
 - 23190-HYD-XX-XX-DR-C-3000 Rev P11 Drainage Layout (Received 30/10/2025)
 - 23190-HYD-XX-XX-DR-C-4100 Rev P04 Interception Plan (Received 30/10/2025)
 - 23190-HYD-XX-XX-DR-C-4500 Rev P03 Water Quality Plan (Received 30/10/2025)
 - 23190-HYD-XX-XX-DR-C-4600 Rev P03 Maintenance Plan (Received 30/10/2025)
 - 23190-HYD-XX-XX-DR-C-5100 Rev P02 Site Sections Sheet 1 (Received 30/10/2025)
 - 23190-HYD-XX-XX-DR-C-5002 Rev P01 Site Sections Sheet 2 (Received 30/10/2025)
 - 23190-HYD-XX-XX-DR-C-5003 Rev P02 Site Sections Sheet 3 (Received 30/10/2025)
 - R548-P03F Proposed Block Plan (Received 30/10/2025)
 - R548 P-04D Proposed Site Sections (Received 30/10/2025)
 - R548-P06C Domestic Lighting Plan (Received 30/10/2025)
 - R548-P07C Proposed External House Type Finishes Site Plan (Received 30/10/2025)
 - R548 -P31 Floor plans/elevations and section - House type D (V1) 3 Bedroom Detached House (Received 30/10/2025)

- R548- P32 Floor Plans/elevation and section - House type C(V5) 2 Bed Detached Bungalow (Received 30/10/2025)
- R548-P33 Floor Plans/elevation and section - House type F (V2) 2 Bed Townhouse + Garage (Received 30/10/2025)
- R548-P34 Floor plans/elevation and section - House type F (V1) 2 Bedroom Townhouse + Garage (Received 30/10/2025)
- R548-P35 Floor plans/elevation and section - House type F (V2) 3 Bedroom Townhouse (Received 30/10/2025)
- R548-P36 Floor plans/elevation and section - House type F (V2) 3 Bedroom Townhouse (Received 30/10/2025)
- R548 P-02 Rev L - Proposed Site Plan (Received 18/11/2025)
- R548 P-43 - Phase 3 Site Plan (Received 18/11/2025)
- R548 S-01B Topographic Site Plan + OS Map Location Plan (Received 30/10/2025)
- Landscape Ecology Management Plan (Received 30/10/2025)
- Design Access Statement (Received 30/10/2025)
- 23190-HYD-XX-XX-SH-C-0003 Permeable Paving Schedule (Received 30/10/2025)

Reason: In order to be clear on the approved scheme of development in the interests of protecting visual amenity and the special qualities of the National Park. Policy: Local Development Plan 2 – Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 14 (Conservation of the Pembrokeshire Coast National Park) and 29 (Sustainable Design).

3. In the first available planting season following approval, planting must be implemented in accordance with the revised Landscape and Ecological Enhancement Plan. Any existing plants retained; or new plants planted in accordance with the approved scheme which, within a period of 5 years after implementation of the approved development are removed, die, become diseased or damaged to such extent that, in the opinion of the Local Planning Authority, the function in relation to this planning approval is no longer delivered, shall be replaced with plants of similar size and specification. Any variations to the details of the documents and plans must only be undertaken after the proposed variations have been agreed in writing by the LPA.
Reason: To prevent detrimental impact to trees, hedges and other landscape features which contribute to the amenity, landscape & biodiversity of the site and surrounding area. Local Development Plan 2 – Policies: 1 (National Park Purposes and Duty), 8 (Special Qualities), 14 (Conservation and enhancement of the Pembrokeshire Coast National Park), 30 (Amenity), SPG 12 – Biodiversity, Technical Advice Note (TAN) 5: Nature Conservation and Planning (2009) and Technical Advice Note (TAN) 10: Tree Preservation Orders (1997).
4. Prior to the occupation of Phase 3, the off-street parking facilities for residents and visitors for all vehicles, including cycles shown on the plan R548-P-02L hereby approved, shall be provided, and thereafter retained for that purpose.
Reason: In the interests of road safety and to protect the amenity of local residents from excessive noise, vibration, smoke, odour, and dust. Policy: Local Development Plan 2 – 60 (Impacts of Traffic) and Planning Policy Wales (Edition 12, February 2024).
5. Prior to the occupation of Phase 3, facilities for the safe and secure storage of bicycles for each residential unit shall be indicated on amended plans, and shall be submitted

to, and agreed in writing, by the Local Planning Authority. Thereafter, cycle storage facilities as agreed are to remain on site in perpetuity.

Reason: In the interests of public amenity and convenience. Policy: Local Development Plan 2 – 60 (Impacts of Traffic) and Planning Policy Wales (Edition 12, February 2024).

6. Prior to the occupation of Phase 3 facilities to provide ULEV charge points shall be installed according to a scheme to be submitted to, and approved in writing, by the Local Planning Authority.

Reason: In the interests of public amenity and convenience. Policy: Local Development Plan 2 – 60 (Impacts of Traffic) and Planning Policy Wales (Edition 12, February 2024).

7. All surface water shall be trapped and disposed of so as not to flow onto any part of the public highway.

Reason: In the interests of road safety. Policy: Local Development Plan 2 – 60 (Impacts of Traffic) and Planning Policy Wales (Edition 12, February 2024).

8. Prior to the occupation of the 36th residential unit within the overall development, the existing access to the north of the site shall be stopped up in accordance with the approved plans. All hard-core is to be removed, and the hedgerow is to be reinstated.

Reason: In the interests of public amenity and convenience. Policy: Local Development Plan 2 – 60 (Impacts of Traffic) and Planning Policy Wales (Edition 12, February 2024).

9. No building shall be occupied until the drainage system for the site has been completed in accordance with the approved details. Thereafter, no further surface water and/or land drainage shall be allowed to connect directly or indirectly with the public sewerage system.

Reason: To prevent hydraulic overloading of the public sewerage system, to protect the health and safety of existing residents and ensure no pollution of or detriment to the environment. Policy: Local Development Plan 2 – Policy 29 (Sustainable Design).

10. The construction phase operation times for the development shall only be carried out on site within the hours of 0730 to 1800 hours Monday to Saturday, and deliveries within 0800 to 1800 hours Monday to Saturday, and no work shall be carried out on Sundays or Bank Holidays.

Reason: To protect the amenities of the occupiers of nearby dwelling houses. Policy: Local Development Plan 2 – Policy 30 (Amenity).

11. No construction, including site clearance, shall commence until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The CEMP shall be implemented as approved during the site preparation and construction phases of the development. It would be expected that the CEMP required of the above condition shall include the following:
- Construction methods: details of materials used in construction; details of how any waste generated will be managed.
 - General Site Management: details of the construction programme, including timetable, details of site clearance; details of site construction drainage site set-up plan detailing how sensitive receptors will be protected from harm e.g. fencing, containments areas, appropriately sized buffer zones between storage areas (of

spoil, oils, fuels, concrete mixing and washing areas) and any watercourse or surface drain.

- Biodiversity Management during construction: details of habitat retention and protection; invasive species management; species and habitat protection, avoidance, mitigation and enhancement measures (as detailed with the Extended Phase 1 Survey).
- Soil Management: details of topsoil strip, storage and amelioration for re-use.
- CEMP Masterplan: details of the extent and phasing of development; location of landscape and environmental resources; design proposals and objectives for integration and mitigation measures.
- Control of Nuisances: details of restrictions to be applied during construction, including timing, duration and frequency of work.
- Resource Management: details of fuel and chemical site storage and containment; details of waste generation and its management; details of the consumption of water and wastewater.
- Pollution Prevention
- Protection of nearby watercourses.
- Details of the persons and bodies responsible for activities set out in the CEMP and emergency contact details. For example, contract manager, site manager, contractors, visitors, site environmental advisor, landscape clerk and ecological clerk of works to ensure construction compliance with approved plans and environmental regulations.
- Construction phase lighting.

Reason: To ensure that animal and plant species and habitats listed under the Conservation of Habitats and Species Regulations 2017 (as amended) are adequately protected, and to protect and enhance the character and appearance of the site and its setting within the Pembrokeshire Coast National Park. Policy: Local Development Plan 2 – Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 10 (sites and species of European importance), 11 (Nationally protected sites and species), 14 (Conservation of the Pembrokeshire Coast National Park) and Section 6 of PPW Edition 12.

12. Notwithstanding the development hereby approved, no development shall commence until an Ecological Enhancement Plan (EEP) for the provision of biodiversity improvement features at the site has been submitted to and approved by the Local Planning Authority. The EEP shall be carried out in accordance with the approved details.

Reason: To ensure that animal and plant species and habitats are adequately protected, and to protect and enhance the character and appearance of the site and its setting within the Pembrokeshire Coast National Park. Policy: Local Development Plan 2 – Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 10 (sites and species of European importance), 11 (Nationally protected sites and species), 14 (Conservation of the Pembrokeshire Coast National Park) and Section 6 of PPW Edition 12.

13. Prior to the first occupation of the proposed development, the off-street parking facilities for residents and visitors for all vehicles, including cycles, shown on the plan

R548-P-02L hereby approved shall be provided, and thereafter retained for that purpose.

Reason: In the interests of public amenity and convenience. Policy: Local Development Plan 2 – 60 (Impacts of Traffic) and Planning Policy Wales (Edition 12, February 2024).

14. Prior to occupation, facilities for the safe and secure storage of bicycles for each residential unit shall be indicated on plans to be submitted to and agreed by the Local Planning Authority. Thereafter, cycle storage facilities are to remain on site in perpetuity.

Reason: In the interests of public amenity and convenience. Policy: Local Development Plan 2 – 60 (Impacts of Traffic) and Planning Policy Wales (Edition 12, February 2024).

15. Prior to occupation, facilities to provide ULEV charge points shall be installed according to a scheme to be submitted to, and approved in writing, by the Local Planning Authority.

Reason: In the interests of public amenity and convenience. Policy: Local Development Plan 2 – 60 (Impacts of Traffic) and Planning Policy Wales (Edition 12, February 2024).

16. All surface water shall be trapped and disposed of so as not to flow onto any part of the public highway.

Reason: In the interests of public amenity and convenience. Policy: Local Development Plan 2 – 60 (Impacts of Traffic) and Planning Policy Wales (Edition 12, February 2024).

6. **Informatives**

The applicant's attention is drawn to the consultation response from Natural Resources Wales.

Highways

The permission hereby granted shall not be construed as authority to carry out works on the highway or any works that may affect a drainage channel/culvert or water course. The applicant is advised that a permit and, potentially, a Section 278 agreement must be obtained from the Highway Authority before any works are carried out on any footway, footpath, carriageway, verge, or other land forming part of the highway. All works on the highway will require a permit, and an application must be submitted to the County Council's Street Care Team up to 3 months in advance of the intended start date, depending on the scale of the works and the road's classification. The applicant is also advised that Consent may be required under Section 23 of the Land Drainage Act 1991. The Street Care team can be contacted via streetcare@pembrokeshire.gov.uk or 01437 7764551 for an updated list.

The developer is advised that, as part of the detailed design of the highway works required by the above conditions, the County Highway Authority may require necessary accommodation works to street lights, road signs, road markings, highway drainage, surface covers, street trees, highway verges, highway surfaces, surface edge restraints and other street furniture/equipment.

The developer is reminded that it is an offence to allow materials to be carried from the site and deposited on, or to damage, the highway from uncleaned wheels or badly loaded vehicles. The Highway Authority will seek, wherever possible, to recover any expenses incurred in clearing, cleaning, or repairing highway surfaces, and to prosecute persistent offenders. (Highways Act 1980, Sections 131, 148 and 149).

It is the responsibility of the Authority to provide the naming and numbering of all roads and new developments, and to facilitate the provision of service connections. To ensure suitable and accurate addressing is provided, contact the Street Naming & Numbering Officer on 01437 775224 at the earliest opportunity should this application be approved.

Section 59 of the Highways Act permits the Highway Authority to charge developers for damage caused by excessive weight and movements of vehicles to and from a site. The Highway Authority will pass on the cost of any excess repairs over normal maintenance costs to the applicant/organisation responsible for the damage.

7. **Appendices**

C3 assessment

APPENDIX – C3 ASSESSMENT

NP/25/0614/FUL: Reconfiguration of part of site layout and substitution of approved residential apartments with dwellinghouse types (known as Phase 3) upon a partly completed residential development (granted planning permission under reference NP/23/0168/FUL) – Land north of Whitlow, Narberth Road, Saundersfoot, Pembrokeshire, SA69 9BE.

The Town and Country Planning (General Permitted Development etc.) (Amendment) (Wales) Order 2022) No.994 (W.211) and No.997 (W.213) Changes to Planning Policy Wales (PPW) section 4.2 Housing regarding: affordability and the impact of second homes and short term lets.

Two new Statutory Instruments were introduced in October 2022 which create new use classes C5 and C6.

The three uses now included are:

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

Simultaneously Welsh Government amended the Town and Country Planning (General Permitted Development) Order 1995 to allow permitted changes between the new use classes – C3, C5 and C6 or a mixture of those uses. These permitted changes can be withdrawn by way of a direction made under article 4 of the 1995 Order.

The Welsh Government also amended Planning Policy Wales to reflect the legislative changes. These policy changes make it explicit that, where relevant, the prevalence of second homes and short-term lets in a local area must be taken into account when considering housing requirements and policy approaches in Local Development Plans.

The permitted changes between the C3, C5 and C6 use classes, or a mix thereof, in the 1995 Order may also be removed by the Authority by way of planning conditions to restrict the use of a development to one particular use class within the Order, effectively preventing the ability to move between uses without planning permission.

Planning conditions are subject to a number of tests established in the Welsh Government circular WGC016/2014 'The Use of Planning Conditions for Development Management'¹ so any condition imposed would need to meet the tests, that conditions must be: (i) necessary; (ii) relevant to planning; (iii) relevant to the development to be permitted; (iv) enforceable; (v) precise; and (vi) reasonable in all other respects.

¹ [Microsoft Word - Planning Conditions Circular - The Use of Planning Conditions for Development Management - Publication version without front cover 20141006.docx \(gov.wales\)](#)

Officers have considered the appropriateness of applying conditions to control occupancy given the amendments to the Use Classes Order 1987 which provides for the three use classes.

The relevant policies from the Local Development Plan that apply are:

Policy 46 Housing (Strategy Policy): When the Pembrokeshire Coast National Park Local Development Plan 2 was prepared it included a housing requirement figure which incorporated an allowance for second homes and holiday homes known as a 'vacancy rate'. Dwelling growth associated with the projected household growth is calculated using a dwelling 'vacancy rate' which takes account of the number of vacant or second properties in the National Park. Pembrokeshire Coast National Park has a high vacancy rate due to the number of second/holiday homes in the area. The total housing requirement figure for the whole of the National Park area assumed that of those properties built during the LDP 2 period (until 2031) 26.7% of these would be used as either second homes or holiday homes. This figure was derived from census information on percentages in different communities at the base date of the evidence base for the Local Development Plan, so it was not a uniform figure for the whole area of the National Park. 26.7% is an average across the whole of the National Park.

A greater prevalence for second homes and short-term lets than anticipated in a specific location would be an issue for implementing the Local Development Plan's housing requirement under Policy 46 Housing (Strategy Policy) of the Local Development Plan as it could undermine anticipated delivery of (in particular) primary residences. Conversely, a lesser prevalence for second homes and holiday homes than anticipated would mean that the Local Development Plan's housing requirements under Policy 46 Housing (Strategy Policy) of the Local Development Plan were capable of being delivered and that holiday homes and second homes were less of an issue. This analysis, it is considered, could provide a rationale for justifying a need to impose a planning condition to restrict permitted changes between the new use classes on a case-by-case basis where a greater prevalence of second homes and holiday let than anticipated in the Local Development Plan's strategy is considered likely.

Policy 40 Self-catering Development: Local Development Plan 2 also includes Policy 40 Self-catering Development which only permits self-catering development in specific locations (in a brownfield location in a Centre or in a conversion in a countryside location) but only in those instances where the site or building is inappropriate for market or affordable housing provision. Policy 40 is considered to provide strong justification for the imposition of a condition limiting use to C3 (Dwellinghouses) and restricting permitted development rights to move to C5 (Second Homes) or C6 (Short-term lets) uses.

However, given that a vacancy rate allowance, as set out above under the Policy 46 Housing commentary, is already factored into the housing provision figures of the Local Development Plan 2 the Authority will be required to consider the prevalence of second homes and holiday lets in a locality in coming to such a decision as to the necessity of imposing a condition.

Policy 47 Housing Allocations or Land with Permission & Policy 48 Affordable Housing:

Both these policies are supported by assumptions made to determine the viability of housing development to deliver the Authority’s affordable housing targets. The viability was based on open market housing prices. If occupancy controls were imposed on housing then this can impact on viability. Although there is not yet specific evidence on the impact of restrictions in use in the National Park, evidence regarding the specific viability impact of the imposition of a primary residence control is emerging in locations such as Cornwall, Dorset², the Scilly Isles³ and Exmoor National Park^{4 5}.

The documents referred to above advise that placing additional restrictions on new homes to exclude use for holiday letting and second homes may affect the market value of properties built as it limits the number of buyers by excluding all prospective second home and short-term letting owners.

The rule of thumb used is that 95% of open market value would be appropriate when a condition restricting second home or holiday letting is used.

Any reduction in a development’s viability would be likely to have negative implications for the Authority’s affordable housing numbers which is a key strategic objective of Local Development Plan 2.

Taking each Policy listed above in turn, in light of the new Statutory Instruments and changes to Planning Policy Wales, the planning application’s compliance is considered:

The following matters are material:

- The revised proposal is for :

Number		Type	Tenure	Plots
2 no.	1 bed	Semi-Detached Bungalow	Affordable	14 & 15
2 no.	1 bed	Detached Flat	Affordable	31 & 32
1 no.	2 bed	Detached Bungalow	Affordable	16
6 no.	2 bed	Semi-Detached House	Affordable	19, 20, 21, 22, 23 & 24
2 no.	3 bed	Semi-Detached House	Affordable	17 & 18
6 no.	1 bed	Flats	Affordable	25, 26, 27, 28, 29 & 30
8 no.	3 bed	Semi-Detached House		3, 4, 5, 6, 7, 8, 9 & 10
5 no	3 bed	Detached Bungalow		12, 13, 34, 35 & 37
2 no.	3 bed	Detached House		33 & 36
3 no.	4 bed	Detached House		1, 2 & 11
4 no	2 bed	Terraced Townhouse		38, 39, 40 & 41

² [9e6c81c7-b186-cad3-b5c9-99dab34d40f7 \(dorsetcouncil.gov.uk\)](https://www.dorsetcouncil.gov.uk/9e6c81c7-b186-cad3-b5c9-99dab34d40f7) – Para 4.3 deals with viability issues.

³ <https://www.scilly.gov.uk/sites/default/files/planning-apps/Housing%20Viability%20Assessment%20Council%20of%20Isles%20of%20Scilly%20-%20Final%20Report%20March%202018.pdf> paragraph 2.12

⁴ https://www.exmoor-nationalpark.gov.uk/_data/assets/pdf_file/0027/239715/Inspectors-Report-full.pdf paragraph 79.

⁵ https://www.exmoor-nationalpark.gov.uk/_data/assets/pdf_file/0025/222694/CE12-Three-Dragons-and-Rural-Housing-Solutions-2016-ENPA-Whole-Plan-Viability-Studya.pdf Paragraph 4.5

3 no.	3 bed	Detached Bungalow		45, 46 & 47
3 no.	3 bed	Terraced Townhouse		42, 43 & 44

- 47 residential units are proposed. 19 affordable units (the affordable housing requirement set out in Policy 47 Housing Allocations or Land with Permission for allocation HA3). The offer of 19 affordable dwellings has been agreed with the applicant (19 social rented properties with the agent advising that internal space standards will meet Welsh Government Development Quality Requirements being met).

Policy 46 Housing (Strategy Policy): The table below shows vacancy rate attributable to Saundersfoot Council area from the 2011 Census.

Community/City/Town Council Areas:	All household spaces	Household Spaces with no usual resident:	Household Spaces with No usual resident (%)
Saundersfoot	1680	480	28.57%

For Saundersfoot Community Council area the apportioned second and holiday home allowance ('vacancy rate') made is an estimated 28.57% of the provision could be used as second homes or holiday let.

However, analysis of Saundersfoot records for properties within the Saundersfoot Centre Boundary (development boundary delineated in the Pembrokeshire Coast National Park Local Development Plan 2) show that there is a slightly lower prevalence rate of 27.58% of all residential properties in the Saundersfoot Centre Boundary registered as holiday lets and second homes on the Council Tax register. The information is taken from the Local Land and Property Gazetteer (LLPG).⁶

Saundersfoot
Total Residential Properties: 1751
Total Second Homes and Holiday Lets: 483 (27.58%)
Total Second Homes: 302 (17.25%)
Total Holiday Lets: 181 (10.34%)

When considering applying a condition it is important to note that the Local Development Plan Housing Requirement specifically included an allowance which assumed that a proportion of properties across the National Park would be occupied as second homes or short-term holiday lets/homes and there is a risk that applying a condition to 100% of the properties would cause displacement to other locations. Therefore, if a condition is imposed the Local Planning Authority may wish to apply the condition in line with the assumed percentage for that settlement. In the case of Saundersfoot as there was an assumption that 28.57% (29% if rounded) of properties would be second homes or holiday homes, this would mean applying a condition to 71% of open market properties. Applying a condition to 71% of properties, rather than 100% of properties also assists with viability and affordable housing provision.

⁶ A Local Land and Property Gazetteer (LLPG) is the central corporate database for all addressing used in an authority.

Clustering of Second and Holiday Homes: However, it should also be considered whether higher prevalence can be also found in the area where the application site is located within the Centre Boundary?

To assess this Officers have undertaken further analysis of the Local Land and Property Gazetteer (LLPG) to highlight to highlight where clusters of second homes and holiday lets can be found within the Centre Boundary of Saundersfoot.

Method used⁷: Using a computer algorithm similar data points are grouped together in a dataset. The assumptions inputted by Officers are to have a minimum of 5 such data points (in this case either second home or holiday let) within 100m of each other. DBSCAN finds the groups of points that are close together. It starts by choosing a point at random and then looks at all the other points within a certain distance of that point. If there are enough points within that distance, DBSCAN will consider those points part of a cluster. Then, it repeats the process for each of the points within the cluster until all the points in the cluster have been identified. DBSCAN also identifies points that are too far away from any cluster to be considered part of a group. These points are called "noise" points, and they're usually not useful for making predictions or analysing the data. Overall, DBSCAN is a useful algorithm for finding patterns in data when you don't know how many clusters there are or how big they are.

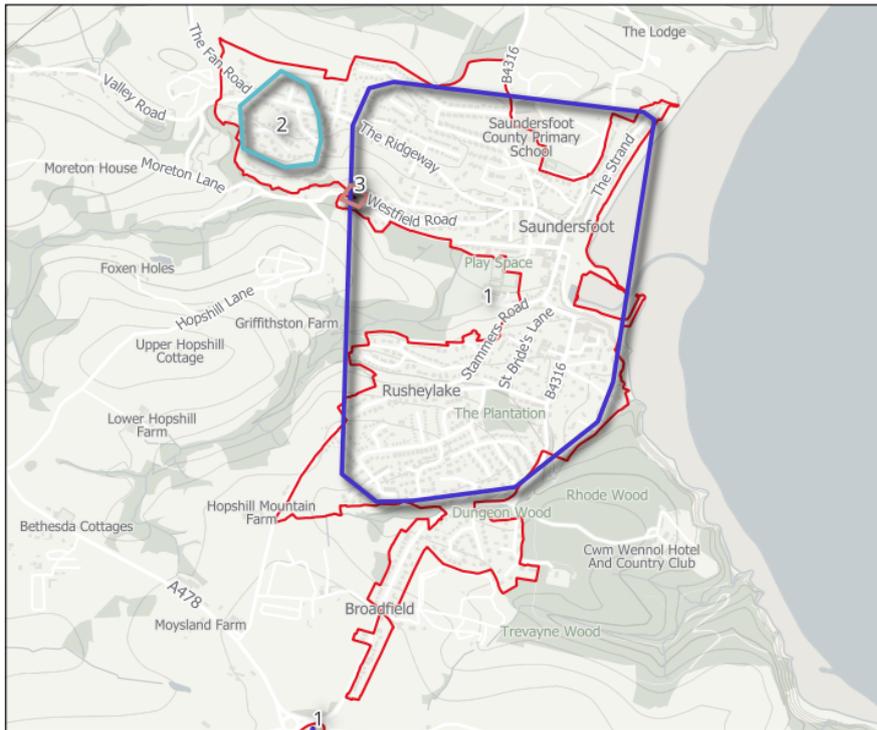
As a result of this analysis it can be shown that holiday lets and second homes are more prevalent in Cluster 1 and Cluster 3, and slightly lower in Cluster 2 identified for Saundersfoot than the vacancy rate assumption for the Community Council area as a whole.

The application site lies on the edge of cluster 1 which has a higher prevalence rate of 34%

The map below identifies the location of the clusters. Detail has been removed from the mapping to ensure individual properties cannot be identified.

This mapping does not mean that there are no second homes or holiday let properties outside these clusters, it simply means that these clusters could be identified because there was a minimum of 5 second homes and/or holiday let located within 100m of another such property in the group.

⁷ DBSCAN stands for Density-Based Spatial Clustering of Applications with Noise



Centre Statistics: Saundersfoot

Second Homes (%)	Holiday Lets (%)	Total (%)
18	10	28

Cluster Statistics: Saundersfoot

Cluster ID	Second Homes (%)	Holiday Lets (%)	Total (%)
1	21	13	34
2	16	11	27
3	20	13	33

Saundersfoot

Second Homes & Holiday Lets Statistics

Creuwyd gan / Created by: Philip Barlow (22/7/2025)

Graddfa / Scale: 1:14,083

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The application site lies adjacent to Cluster 1 where 34% of residential properties are in use as either a second or holiday home. This shows that when considered at a more local level the prevalence of holiday and second homes is slightly greater than anticipated by Policy 46 Housing (Strategy Policy) for this location.

This means that the Local Planning Authority has evidence that both the Centre and the specific location considered have a slightly greater prevalence of second homes and holiday homes than the allowance made for Saundersfoot. The levels shown are greater than the 2011 Census figure for the Community Council area and therefore there is some justification in considering the application of a C3 occupancy condition to the market properties within the proposal.

Next the report considers whether the patterns of development of large-scale sites (5 or more residential units) more recently or the type of the development proposed show a higher prevalence.

Recent Housing Completions on large sites: This section considers how recent housing developments of five or more dwellings that have been developed in Saundersfoot have been occupied. The base date of Local Development Plan 2 (2015) is used as a reference point.

Since the base date of Local Development Plan 2 there is only one large site (5 or more dwellings granted permission) that has had completions recorded. The site shows an estimated 17% of housing completions are in use as either holiday let or second homes. It should be noted that this is a single site and the figures are calculated from a low number of completions. This can be compared with the Community Council figure of 28.57% from the 2011 Census figures.

The evidence for the Centre and the cluster mapping and the evidence from this one large site (an estate) where completions have taken place recently are insufficient to justify consideration of imposing a C3 occupancy condition on the proposal.

Similar Types of Proposals: The type of proposal in question, involves new build development of bungalows, detached and semi-detached houses and terraced town houses. These have also been considered in terms of prevalence of holiday let and second homes in similar developments in Saundersfoot. 748 detached houses, 150 semi-detached houses and 128 terraced houses were identified and the Local Land and Property Gazetteer was again checked for prevalence levels. Analysis shows that 13% of detached houses, 15% of semi-detached houses and 23% of terraced houses are occupied as second homes or holiday lets. Each of these is lower than the anticipated 28.57% and despite the proximity to Cluster 1 which has a higher prevalence of 34%, it is considered that there is limited justification for imposing a C3 occupancy restriction on any of the proposed market dwellings.

The second type of development considered is estate type developments.

	Second and Holiday Home (%)		Near Whitlow	
1	7.14	Near Whitlow	4.93	Average
2	0	Near Whitlow	3.57	Median
3	0	Near Whitlow	12.5	High
4	7.69	Near Whitlow	0	Low
5	12.5	Near Whitlow		
6	0	Near Whitlow		
7	0	Near Whitlow		
8	12.07	Near Whitlow		
9	18.75			
10	1.85			
11	20.69			
12	11.48			
13	32.73			
14	11.76			
15	28.95			
16	0			
All Sites	average		10.35	
	median		9.6	
	Low		0	
	High		32.73	

The analysis of similar types of developments, (in this case estate type developments), with an average of 10.35 % of residential dwellings being occupied as

second homes or short-term letting does not demonstrate that there is justification in principle for applying a C3 occupancy condition to the residential units on the application site.

Policy 47 Housing Allocations or Land with Permission & Policy 48 Affordable Housing

The revised proposal does not change the affordable housing numbers. Reduced numbers of open market housing proposed would result in an increase of affordable housing on site from 35.1% to 40.4%.

Conclusion on Occupancy Controls:

Taking account of the allowance that has been made for 28.57% of housing development in Saundersfoot Community Council area to be taken up by holiday and second homes and the various measures against which the prevalence of holiday/second homes has been considered it is not considered that there is sufficient justification to impose a condition to restrict occupancy to C3 use only for this proposal.