

Retail Survey

Pembrokeshire County Council

September 2023 Survey

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Introduction and Summary

- 1.1 This document includes survey data and maps from a Pembrokeshire Town Centre Survey conducted in September 2023. The following Town Centres were surveyed:
 - Fishguard
 - Haverfordwest
 - Milford Haven
 - Milford Marina
 - Narberth
 - Pembroke
 - Pembroke Dock

Please note that Pembrokeshire Coast National Park Authority (PCNPA) conducted the survey for town centres in their planning jurisdiction area. These have been added to this report and highlighted in grey. The PCNPA survey was conducted in June 2023).

- 1.2 The survey focused on those properties within the identified Pembrokeshire Local Development Plan (LDP) Town Centre Boundaries which are shown on the maps in Section 3 of this report.
- 1.3 The Local Development Plan is currently being revised and a public consultation of the Deposit Plan was undertaken from January to March 2020. However, the Covid-19 pandemic and publication of new guidance by Natural Resources Wales (NRW) on phosphate levels in riverine Special Areas of Conservation in January 2021 caused a delay to the process and had implications that needed to be addressed through the Plan preparation process. A second Deposit Plan consultation is now planned for autumn 2024.

Collection of Information

- 1.4 For each commercial property the following information was collected:
 - Whether the ground floor was occupied or vacant
 - The use class of the ground floor using the Town and County Planning (Use Classes) Order 1987 (as amended).
- 1.5 Desk top analysis of maps has provided a gross floorspace for all retail units.

- 1.6 For vacant properties subsequent searches of historic planning files and previous surveys were used to help determine the last known use class, where possible.
- 1.7 The tables in the analysis section include information on:

i. A Class Use Classes:

The numbers of properties that were identified as being A1, A2 or A3 within the Use Classes Order.

- A1 uses are shops of all types including supermarkets and retail warehouses. A1 uses also include hairdressers and sandwich bars (except those selling hot food) and some show rooms.
- A2 uses are those offering financial and professional services to visiting members of the public, including banks, building societies, estate agents and betting offices. An amendment was made to the Use Classes Order in Wales¹ in October 2022 which omits betting offices from Use Class C2 and places Betting Shops in the Sui Generis category.
- A3 uses are food and drink outlets including restaurants, bars, pubs and take-aways.²

ii. Type of Class A property:

Disaggregating those units into A1, A2 and A3 use classes helps to provide a clearer picture of the type of service that a unit is providing. A1 units are generally comparison or convenience in nature, however some A1 uses offer services (such as a hairdresser or post office). A2 and A3 use classes are generally of a service nature. The types of unit are divided into the following:

- Comparison unit: Those units selling products of a durable nature to the general public. These are products such as clothing, electronics, music or books.
- Convenience unit: Those units selling products of a non-durable nature to the general public. These are products such as food or toiletries.
- Service unit: Those units offering a service to the general public.
 These are services such as hairdressers, betting shop or estate agent.

¹ The Town and Country Planning (Use Classes) (Amendment) (Wales) Order 2022 came into force on 20 October 2022 and also made changes to Use Class C3 Dwellinghouses which is defined as use as a sole or main residence. The amendment inserted Use Class C5 Dwellinghouses, used otherwise than as a sole or main residences and Use Class C6: Short-term lets.

² Please note the A3 use class has been further amended in England, however this amendment does not currently apply in Wales.

2.0 Summary of Survey Data

- 2.1 The town centres show a variety of change since the last survey in 2022. The vacancy rate for A Class units has increased in Haverfordwest (+4%) and Pembroke (+5%), but has decreased in Milford Haven (-9%) and Narberth (-2%). The vacancy rates for Fishguard, Milford Marina and Pembroke Dock remain the same as in 2022.
- 2.2 Vacancy rates for Wales were reported to have risen in the second quarter of 2023 to 17% a 0.3% increase than the same time in 2022. High Street vacancies increased were up to 16.9%. (Statistics from Wales Retail Consortium). The vacancy rates for Pembrokeshire's largest town centres remains higher than the Welsh rate with the smaller centres of Narberth and Milford Marina and the retail centres in the National Park fairing considerably better.
- 2.3 The vacancy rate of A Class premises within **Fishguard town centre** decreased from 22% in 2021 to 17% in 2022 but has stabilised with the figure remaining at 17% in 2023. During the year a small number of units have changed hands.
- 2.4 The vacancy of A class units in **Haverfordwest town centre** increased by 4 units with 25% vacancies in 2023. Haverfordwest has the highest overall number of vacant units in both the A Class units and in all use classes for all town centres in Pembrokeshire, although there has been a decrease in the number of non-A Class units from 58 in 2022 to 50 in 2023. This would suggest that the function of the town centre may be changing with non-A Class uses increasing slightly. The largest decrease in occupancy has been in the A2 Class (14 units). This includes services such as banks, solicitors and other offices and is likely to reflect the national trend towards provision of online services. The number of A3 Class units occupied has fallen on slightly (3 units).
- 2.5 The **town centre of Milford Haven** recorded 19 vacant A Class units which is a significant decrease from 2022 when there were 28 vacant units. There has been a slight decrease in the overall number of A Class units in the town centre with 91 units being recorded in 2023 and 94 units in 2022. A1 Class units have increased by 2, A3 units increased by 2, and A2 Class unit decreased by a single unit. The overall vacancies of all Classes has also decreased for Milford Haven town centre with 9 less being recorded in 2023 than in 2022.
- 2.6 **Milford Haven Marina** (Milford Waterfront) recorded 2 vacant A Class units with a slight decrease in the number of A1 Class units (from 16 to 14) and an increase in A3 Class units (from 8 to 10). There is a considerable turnover of units in this town centre, but with a low vacancy rate it remains vibrant.

- 2.7 **Narberth** continues to be a thriving town centre with the number of A Class vacancies having decreased from 4 units to 3 units. Whilst it is a smaller town centre compare with the larger towns in Pembrokeshire, it has greater proportion of occupied A1 units (57%) than most.
- 2.8 Following a improving picture in terms of less vacancies for 2022, the town centre of **Pembroke** has experienced a an increase in the A Class vacancy rate of 5% taking it to a slightly higher vacancy rate than in 2021. The increased vacancies are in each of the A Use Classes, with the majority in A1 uses (4 units). In terms of actual units the increase is small, although overall one fifth of the A Class units were recorded as being vacant.
- 2.9 The vacancy rate in **Pembroke Dock** has remained at 19% in 2022. There has been a small increase in the number of A1 units occupied, with a single unit decrease in occupancy for both A2 and A3 Use Classes. Overall there is very little change since the 2022 survey.
- 2.10 Milford Haven and Narberth town centres show a small increase in the number of units occupied by comparison (A1) shops. Milford Marina remains the same as in 2022, whilst Fishguard, Haverfordwest, Pembroke and Pembroke Dock centres have lost comparison good units. The greatest loss has been in Haverfordwest. The number of convenience shops (groceries) in all of the towns remains constant, with just one loss in Fishguard. For service uses, the majority of towns record a decrease in the number of occupied units with Haverfordwest once again bearing the greatest loss, followed by Pembroke. Service units in Milford Marina and Pembroke Dock have remained stable, with small losses in Fishguard, Milford Haven and Narberth.
- 2.11 There has been no change in the high street presence of betting shops (see Table 2.8) and just a reduction of 2 charity shops overall one in Haverfordwest and one in Pembroke Dock. There has been an increase in the number of hairdressers, barbers and beauty salons (see Table 2.10) in Milford Marina and Pembroke but a slight decrease in all other centres, other than Narberth where the number has remained the same.
- 2.12 The South West Wales Regional Retail Study (2017) provided analysis of the relative strengths and weaknesses of Pembrokeshire's town centres, based on the 2016 retail survey, consultant's visits to the centres and a household telephone survey. The survey suggests that this analysis of the relative strengths and weaknesses of Pembrokeshire's Town Centres continues to be relevant.
- 2.13 Additional influences on the occupation of units within town centres other than Covid-19 is the impact of Brexit, the reduction in the presence of banks and building societies on the high street, and the national strategy of some large scale retailers including discounters and fashion retailers. National chain clothes shops have continued to close in Haverfordwest

- which is thought to be as a result of the ongoing decline of the high street and growth of online shopping.
- 2.14 LDP Policy GN.12 'Town Centre Development' requires proposed developments to not create a concentration of more than a third non A1 (retail) uses within a primary frontage. The retail survey shows that the following retail centres have less than two thirds A1 uses in the primary frontage: Fishguard; Narberth and Pembroke. When vacant A1 uses are also deducted, the following town centres have less than two thirds occupied A1 uses in the primary frontage: Fishguard; Haverfordwest; Narberth; Pembroke and Pembroke Dock.

3.0 Retail Planning Policy

- 3.1 Since Pembrokeshire's Local Development Plan was adopted in February 2013 there has been a significant change to the national policy position with the publication of Future Wales The National Plan 2040 (February 2021). National planning policy has also been updated in Planning Policy Wales (Edition 11, 2021 and again in February 2024) and Technical Advice Note 4: Retailing and Commercial Development (November 2016). Future Wales and national planning policy takes a more permissive approach to support multi-functional and vibrant town centres. In September 2022 the Authority published an Interim Advisory Note on Development in Town Centres which provides guidance on the application of planning policy and material considerations when determining planning applications in town centres. The Interim Advisory Note communicates areas where LDP policy is not in conformity with Future Wales and national planning policy. The two main areas of policy are;
 - LDP Policy GN.12 Town Centre Development (criterion 2) seeks to restrict identified primary frontage areas to retail A1 uses, with no more than a third of non-A1 uses permitted. Future Wales Policy 6 adopts a 'Town Centre First' approach to support new commercial, retail, education, health, leisure and public service facilities within town centres. Planning Policy Wales (Edition 12, February 2024) recognises that A1 uses underpin defined retail and commercial centres, but only as one of a diversity of uses that should be encouraged to contribute towards a centre's well-being and success. It identifies the need for regular monitoring of the health of retail centres to identify where vacancy rates are threatening to undermine viability and vitality. In such circumstances the national policy requires planning authorities to consider how non-A1 uses may play a greater role in increasing diversity and reducing vacancy levels.
 - LDP Policy GN.12 Town Centre Development (criterion 4) does not permit a change of use to a residential use (Use Class C3) on a ground floor in a primary or secondary retail frontage. Future Wales states that "As well as non-residential development, town centres are

an appropriate location for new homes" (reasoned justification to policy 6, page 71). Planning Policy Wales (Edition 12, February 2024) accepts that residential uses may be acceptable within retail centre boundaries but that the mix of uses can lead to disturbance through late-night noise. In addition, residential use on the ground floor in primary areas is unlikely to be suitable as it may fragment the shopping frontage and increase the decline of the vibrancy and vitality of the centre. The interim guidance note states that residential uses will continue to be restricted on the ground floor in primary retail areas, and residential uses may be considered appropriate on a ground floor within secondary retail frontage areas.

3.2 The Revised Local Development Plan will use the data from the retail surveys to determine if any changes are required to the extent of the town centres and the retail frontage to ensure that they remain relevant and supported by up-to-date planning policies.

4.0 Data for Town Centres 2023

4.1 Number of Class A units

A1: Uses are shops of all types including supermarkets and retail warehouses. A1 uses also include hairdressers and sandwich bars (except those selling hot food) and some showrooms.

A2: Uses are those offering financial and professional services to visiting members of the public, including banks, building societies and estate agents.

A3: Uses are food and drink outlets including restaurants, bars, pubs and take-aways.

Town	Occupied A1	Occupied A2	Occupied A3	Occupied Mixed A class	Vacant A class	Total A class	% vacant A class	Total number of units vacant (all use classes excluding residential)
Fishguard	46	7	21	2	16	92	17%	20
Haverfordwest	96	23	28	1	49	196	25%	50
Milford Haven	43	8	16	2	19	91	21%	24
Milford Marina	14	0	10	0	2	27	4%	1
Narberth	49	9	23	2	3	86	3%	4
Pembroke	49	14	21	2	22	108	20%	30
Pembroke Dock	59	14	11	0	20	104	19%	23
Tenby					19	187	10%	
Saundersfoot	Natio	nal Park surve	y dated June	2023	2	66	3%	No
St Davids					3	60	5%	No breakdown
Solva		No breakdov	vn available		0	14	0%	available
Newport					0	29	0%	

Note:

- Data is for ground floor units and first floor non-residential units.
- Wales' vacancy rate for High Streets was 16.9 per cent in Quarter 2 2023 (Welsh Retail Consortium).

4.2 Class A units Ground Floor floorspace (gross m sq) 2023

Desk top analysis of maps has provided a gross floorspace for all retail units.

Floorspace	A1 (occupied) floorspace (Sqm)	A2 (occupied) floorspace (Sqm)	A3 (occupied) floorspace (Sqm)	Mixed A class (occupied) (Sqm)	Vacant A class (Sqm)	Grand Total (Sqm)
Fishguard	7606	2764	3187	404	2237	16198
Haverfordwest	15270	5239	4109	141	6980	31739
Milford Haven	5225	1152	1803	603	2800	11583
Milford Marina	1029	0	905	0	120	2054
Narberth	4506	538	4302	1035	183	10609
Pembroke	6696	1881	3288	359	4891	17115
Pembroke Dock	8802	2129	1334	0	2017	14282

4.3 2014 - 2023 Type of Class A Units

Comparison (occupied)

Comparison unit: Those units selling products of a durable nature to the general public. These are products such as clothing, electronics, music or books.

	Fishguard	Haverfordwest	Milford Haven	Milford Marina	Narberth	Pembroke	Pembroke Dock
2014 Comparison (occupied)	39	94	30	8	42	34	48
2016 Comparison (occupied)	35	103	30	9	40	35	45
2018 Comparison (occupied)	32	90	34	9	40	33	38
2019 Comparison (occupied)	32	91	31	9	39	33	37
2020 Comparison (occupied)	29	80	29	8	35	33	36
2021 Comparison (occupied)	30	74	26	7	36	30	36
2022 Comparison (occupied)	30	70	29	12	35	34	37
2023 Comparison (occupied)	28	63	30	12	36	31	35

Convenience (Occupied)

Convenience unit: Those units selling products of a non-durable nature to the general public. These are products such as food or toiletries.

	Fishguard	Haverfordwest	Milford Haven	Milford Marina	Narberth	Pembroke	Pembroke Dock
2014 Convenience (occupied)	4	2	3	0	4	4	1

	Fishguard	Haverfordwest	Milford Haven	Milford Marina	Narberth	Pembroke	Pembroke Dock
2016 Convenience (occupied)	4	2	3	0	4	3	1
2018 Convenience (occupied)	4	3	3	0	4	6	5
2019 Convenience (occupied)	4	3	2	0	4	6	5
2020 Convenience (occupied)	4	3	2	0	4	6	5
2021 Convenience (occupied)	4	3	2	0	4	6	5
2022 Convenience (occupied)	5	3	2	0	5	6	5
2023 Convenience (occupied)	4	3	2	0	5	6	5

Service (occupied)

Service unit: Those units offering a service to the general public. These are services such as hairdressers, betting shop or estate agent.

	Fishguard	Haverfordwest	Milford Haven	Milford Marina	Narberth	Pembroke	Pembroke Dock
2014 Service (occupied)	43	106	47	11	42	63	45
2016 Service (occupied)	45	100	49	9	43	65	44
2018 Service (occupied)	43	94	45	11	41	60	40
2019 Service (occupied)	43	91	46	11	40	59	41
2020 Service (occupied)	42	95	42	8	37	54	39
2021 Service (occupied)	37	88	38	14	36	51	40
2022 Service (occupied)	43	93	35	12	40	52	42
2023 Service (occupied)	41	81	34	12	42	47	42

Vacant

For vacant properties subsequent searches of historic planning files and previous surveys were used to help determine the last known use class, where possible.

	Fishguard	Haverfordwest	Milford Haven	Milford Marina	Narberth	Pembroke	Pembroke Dock
2014 Vacant	9	42	21	0	2	7	17
2016 Vacant	16	45	18	1	2	8	21
2018 Vacant	19	38 ³	23	2	5	9	28
2019 Vacant	16	38	18	3	8	9	28
2020 Vacant	17	44	17	8	10	15	26
2021 Vacant	21	54	28	1	8	21	26
2022 Vacant	16	45	28	0	4	16	20
2023 Vacant	16	49	19	1	3	22	20

Total A Class

The numbers of properties that were identified as being A1, A2 or A3 within the Use Classes Order.

	Fishguard	Haverfordwest	Milford Haven	Milford Marina	Narberth	Pembroke	Pembroke Dock
2014 Total A class	95	244	101	19	91	109	111
2016 Total A class	100	250	101	19	90	113	111
2018 Total A class	98	225	106	22	90	108	111
2019 Total A class	93	223	98	23	90	107	112
2020 Total A class	92	222	90	24	86	108	106
2021 Total A class	94	220	95	22	86	108	107

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	Fishguard	Haverfordwest	Milford Haven	Milford Marina	Narberth	Pembroke	Pembroke Dock
2022 Total A Class	94	211	94	24	84	108	104
2023 Total A Class	92	196	91	27	86	108	104

4.4 Floorspace (sq m gross) A Class 2023

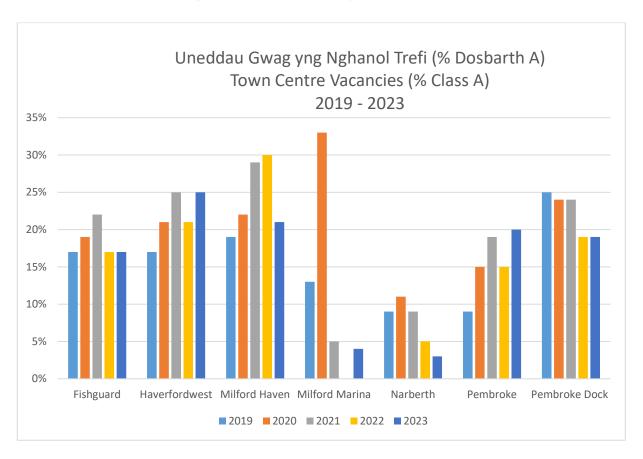
Desk top analysis of maps has provided a gross floorspace for all retail units

Town	Comparison Floorspace (occupied)	Convenience Floorspace (occupied)	Service Floorspace (occupied)	Mixed (A Class) (occupied)	Vacant	Total
Fishguard	4976	1510	5066	205	2077	13834
Haverfordwest	11473	947	12197	141	10234	34992
Milford Haven	3929	697	3662	603	2665	11556
Milford Marina	786	0	1028	0	120	1934
Narberth	3399	775	5330	1035	316	10855
Pembroke	4620	1001	6244	359	4693	16917
Pembroke Dock	5182	3860	5116	0	2057	16215

4.5 Table showing changes in Class A Vacancy Rates from 2014 to 2022.

Town	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
Fishguard	10%	9%	16%	15%	20%	17%	19%	22%	17%	17%
Haverfordwest	9%	17%	18%	25% /	17%	17%	21%	25%	21%	25%
				16%						
Milford Haven	14%	21%	18%	20%	23%	19%	22%	29%	30%	21%
Milford Marina	N/A	0%	5%	19%	9%	13%	33%	5%	0%	4%
Narberth	4%	2%	2%	6%	6%	9%	11%	9%	5%	3%
Pembroke	9%	6%	7%	12%	10%	9%	15%	19%	15%	20%
Pembroke Dock	10%	15%	19%	22%	26%	25%	24%	24%	19%	19%
Tenby	7%	3%	4%	5%	7%	4%	4%	8%	6%	10%
Saundersfoot	3%	8%	6%	5%	2%	0%	3%	5%	1%	3%
St Davids	3%	3%	3%	3%	5%	8%	7%	8%	5%	5%
Solva	8%	0%	0%	8%	0%	7%	7%	7%	7%	0%
Newport	8%	0%	0%	8%	0%	7%	7%	7%	0%	0%
National UK	13.9%	13.2%	12.5%	12.7%	12.2%	12.4%	12.4%	15.8%	13.9%	
Average										

4.6 Graph illustrating A Class Vacancy Rates 2019 to 2023.



4.7 Table showing percentage of occupied A1 uses in the primary retail frontage.

Town Centre	Total primary retail frontage in metres	Total primary retail frontage in metres with an A1 use (occupied and vacant)	Percentage of primary retail frontage with an A1 use (occupied and vacant)	Total primary retail frontage in metres with an occupied A1 use	Percentage of primary retail frontage with an occupied A1 use
Fishguard	414	200	48%	167	40%
Haverfordwest	1127	758	67%	497	44%
Milford Haven	200	167	84%	140	70%
Milford Marina	39	39	100%	39	100%
Narberth	468	272	58%	259	55%
Pembroke	484	256	53%	196	41%
Pembroke Dock	1043	745	71%	662	64%

4.8 Changes in betting shops between 2009 and 2023 (only occupied units shown)

Betting shops Total Numbers

Town	2009	2012	2014	2016	2018 ⁴	2019	2020	2021	2022	2023
Fishguard	1	1	1	1	1	1	0	0	0	0
Haverfordwest	2	2	2	3	3	3	3	2	2	2
Milford Haven	2	3	3	3	3	3	2	2	2	2
Narberth	0	1	1	1	1	1	1	0	0	0
Pembroke	1	1	2	2	1	2	1	1	1	1
Pembroke Dock	0	1	2	3	2	2	2	1	1	1
Total	6	9	11	13	11	11	9	6	6	6
Newport	0	0	0	0	0	N/A	N/A	N/A	N/A	N/A
Saundersfoot	0	0	0	0	0	N/A	N/A	N/A	N/A	N/A
Solva	0	-	0	0	0	N/A	N/A	N/A	N/A	N/A
St Davids	0	0	0	0	0	N/A	N/A	N/A	N/A	N/A
Tenby	2	2	3	2	2	N/A	N/A	N/A	N/A	N/A
Total	2	2	3	2	2	N/A	N/A	N/A	N/A	N/A
Grand Total	8	11	14	15	13	N/A	N/A	N/A	N/A	N/A

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4.9 Changes in charity shops between 2009 and 2022 (occupied units only)

Town	2009	2012	2014	2016	2018	2019	2020	2021	2022	2023
Fishguard	1	3	3	2	4	4	4	4	3	3
Haverfordwest	8	9	12	11	11	11	9	9	12	11
Milford Haven	3	3	4	3	4	7	4	3	3	3
Narberth	0	3	3	3	3	3	3	3	3	3
Pembroke	4	4	4	4	4	4	3	3	3	3
Pembroke Dock	1	1	7	5	4	6	5	4	6	5
Total	17	23	33	28	30	35	28	26	30	27
Newport	-	0	0	0	0	N/A	N/A	N/A	N/A	N/A
Saundersfoot	0	0	0	0	0	N/A	N/A	N/A	N/A	N/A
Solva	-	-	0	0	0	N/A	N/A	N/A	N/A	N/A
St Davids	1	1	1	1	1	N/A	N/A	N/A	N/A	N/A
Tenby	5	6	4	4	4	N/A	N/A	N/A	N/A	N/A
Total	6	7	5	5	5	N/A	N/A	N/A	N/A	N/A
Grand Total	23	30	38	33	35	N/A	N/A	N/A	N/A	N/A

4.10 Changes in the of premises occupied as barbers/hairdessers and beauty salons between 2020 and 2022 (occupied units only)

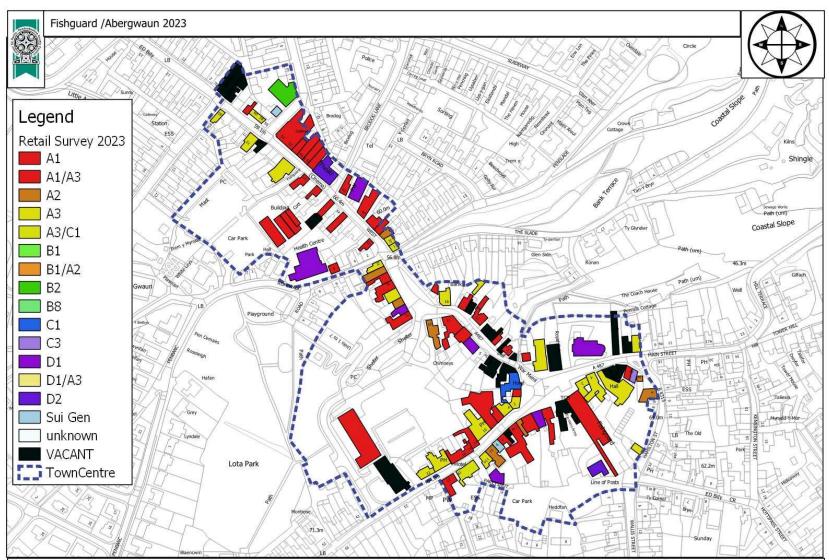
Town	2020	2021	2022	2023
Fishguard	7	6	8	6
Haverfordwest	10	14	15	14
Milford Haven	7	8	8	6
Milford Marina	2	1	0	3
Narberth	4	5	6	6
Pembroke	8	10	11	13
Pembroke Dock	9	11	14	13
Total	47	55	62	52

5.0 Town Centre Maps (see Appendices)

The maps show the use class of properties within the town centre at the time of the retail survey.

The following list gives an indication of the types of use which may fall within each use class.

- **A1 Shops** Shops, retail warehouses, hairdressers, undertakers, travel and ticket agencies, post offices (but not sorting offices), pet shops, sandwich bars, showrooms, domestic hire shops, dry cleaners and funeral directors.
- **A2 Financial and professional services** Financial services such as banks and building societies, professional services (other than health and medical services) including estate and employment agencies.
- **A3 Food and drink -** For the sale of food and drink for consumption on the premises restaurants, snack bars and cafes, drinking establishments and take-aways.
- **B1 Business -** Offices (other than those that fall within A2), research and development of products and processes, light industry appropriate in a residential area.
- **B2 General industrial -** Use for industrial process other than one falling within class B1 (excluding incineration purposes, chemical treatment or landfill or hazardous waste).
- **B8 Storage or distribution -** Use for storage or as a distribution centre. This class includes open air storage.
- **C1 Hotels** Hotels, boarding and guest houses where no significant element of care is provided (excludes hostels).
- C3 Dwellinghouses, used as sole or main residences
- C5 Dwellinghouses, used otherwise than as sole or main residences
- **C6 Short-term Lets**
- **D1 Non-residential institutions -** Clinics, health centres, crèches, day nurseries, day centres, schools, art galleries (other than for sale or hire), museums, libraries, halls, places of worship, church halls, law court, non residential education and training centres.
- **D2 Assembly and leisure -** Cinemas, music and concert halls, casinos, bingo and dance halls, swimming baths, skating rinks, gymnasiums or area for indoor or outdoor sports and recreation (except for motor sports, or where firearms are used).
- **Sui Generis** Certain uses do not fall within any use class and are considered a 'unique use'. Such uses include: betting shops, theatres, hostels, scrap yards, petrol filling stations and shops selling and/or displaying motor vehicles, launderettes, taxi businesses and amusement centres.

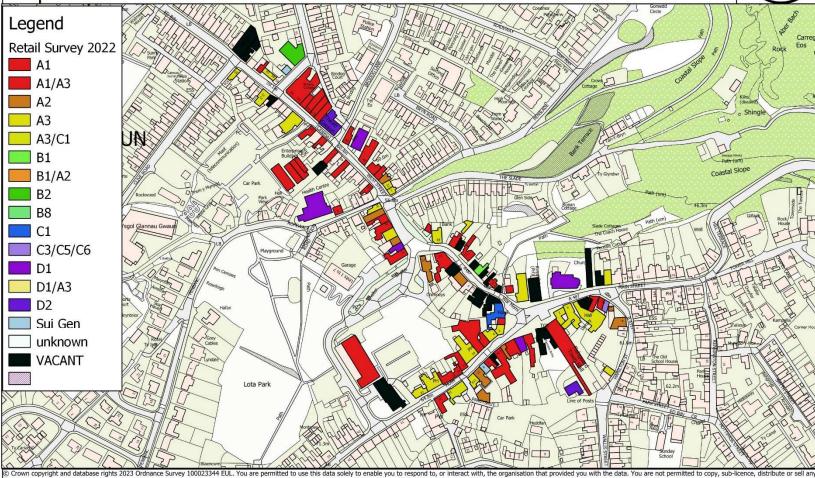


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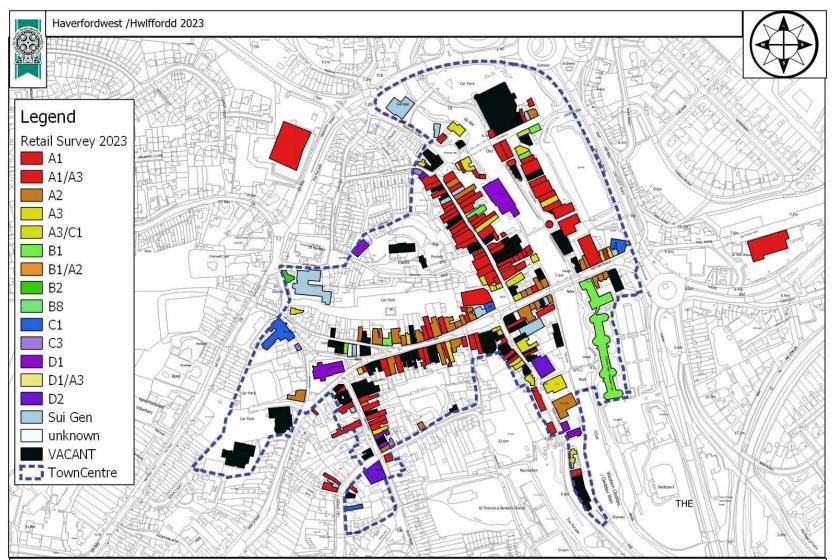


Fishguard / Abergwaun 2022

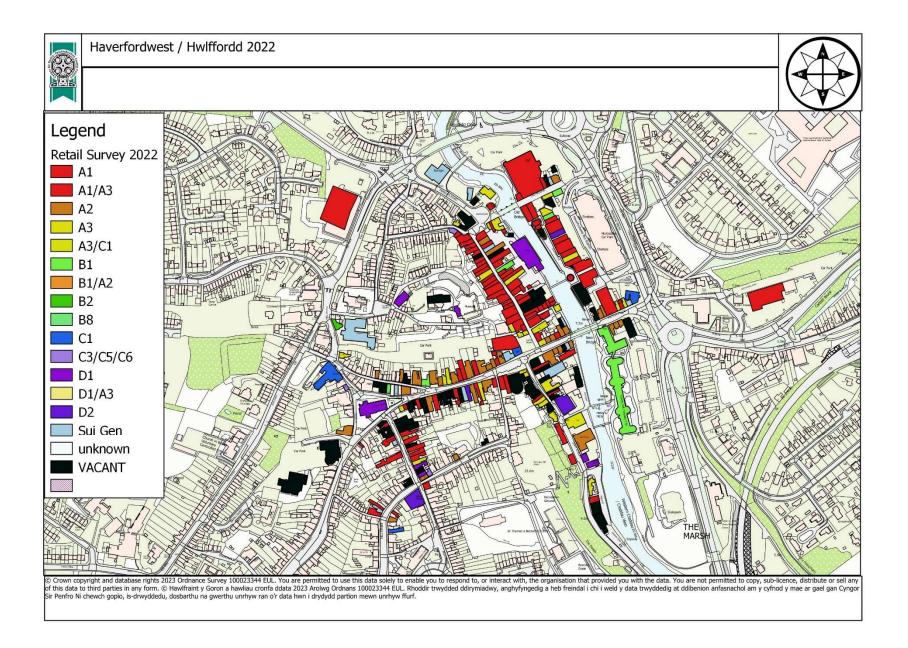


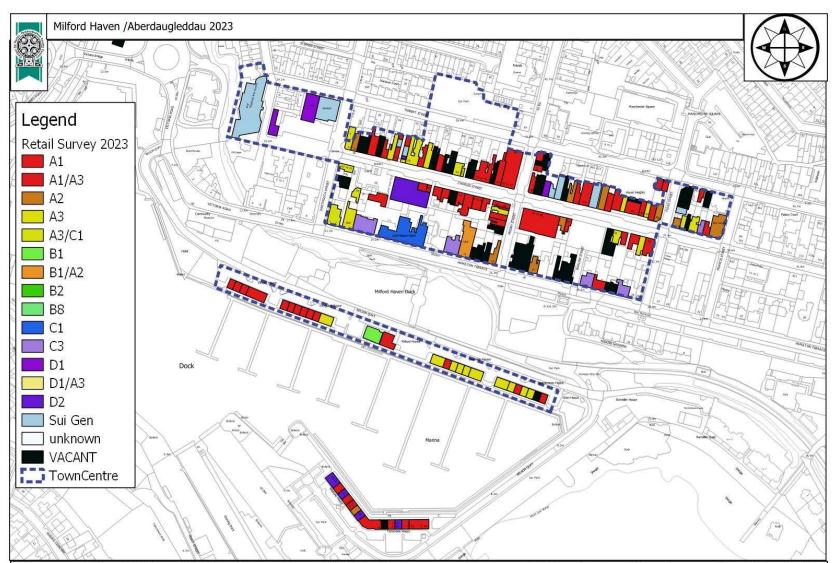


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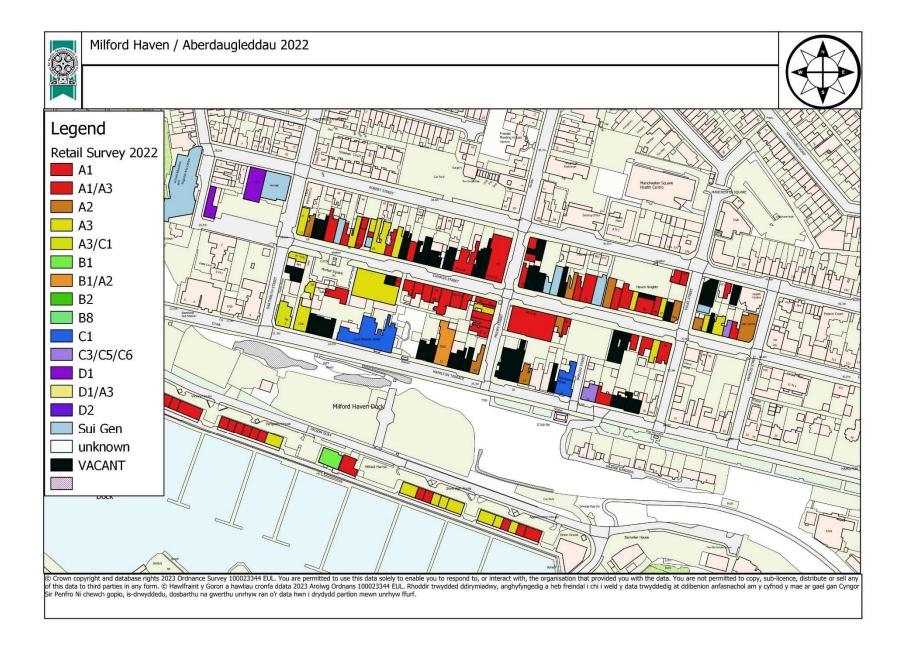


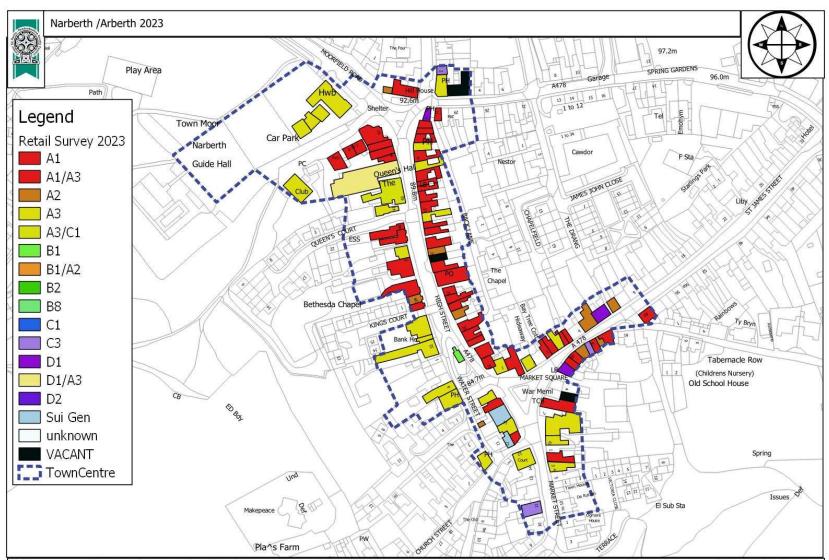
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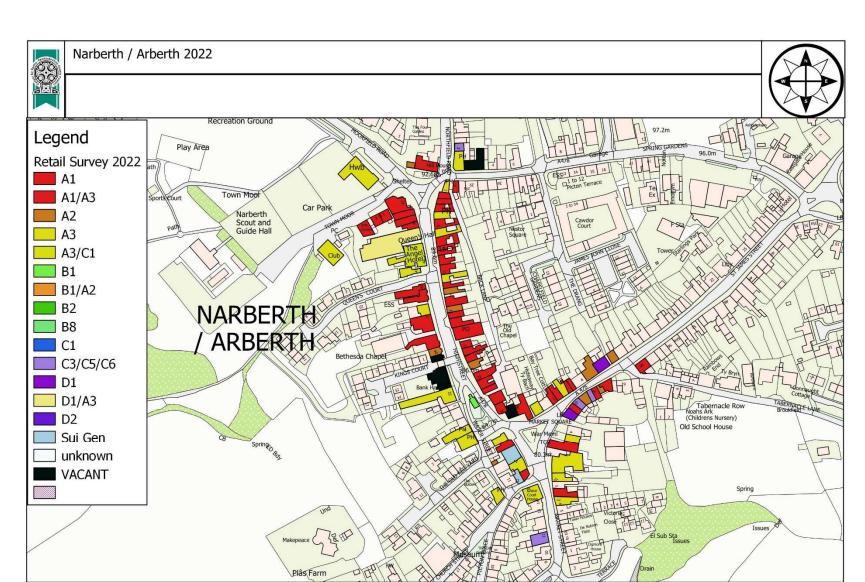


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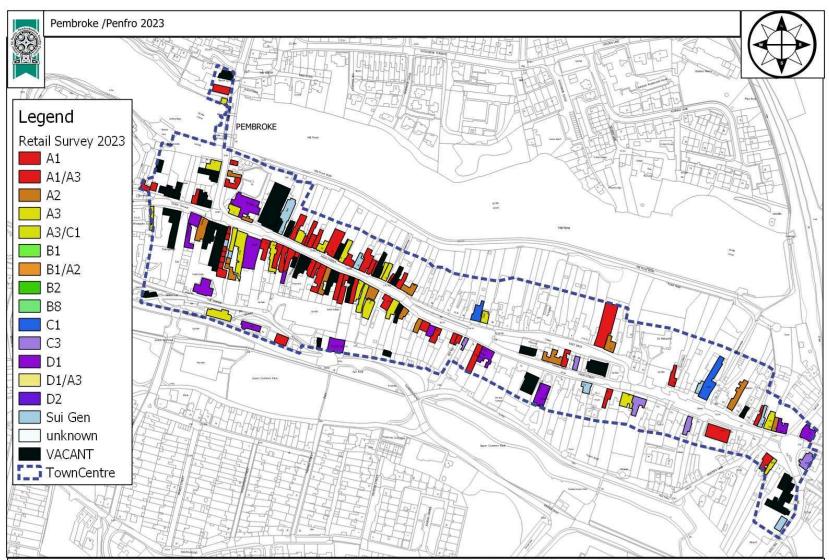




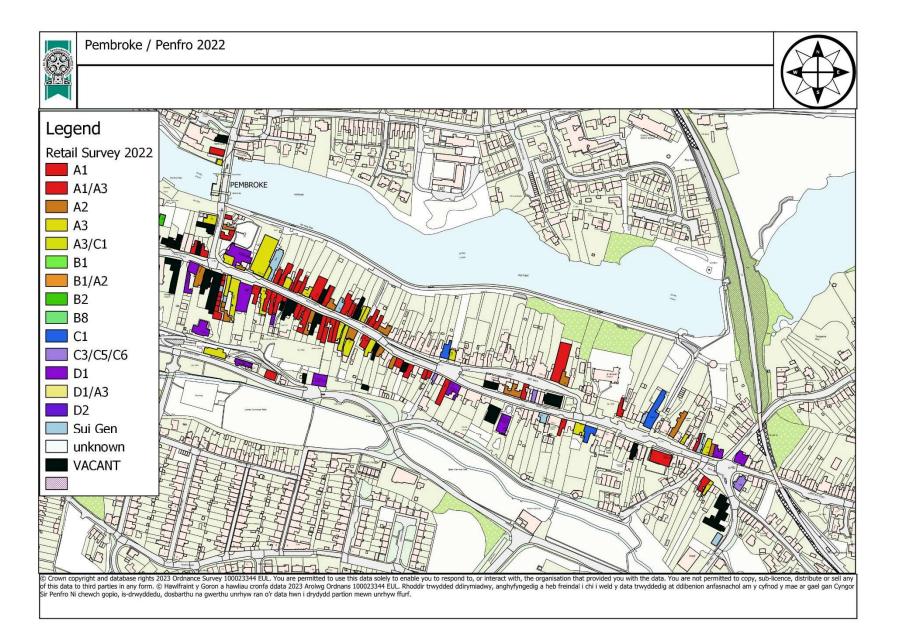
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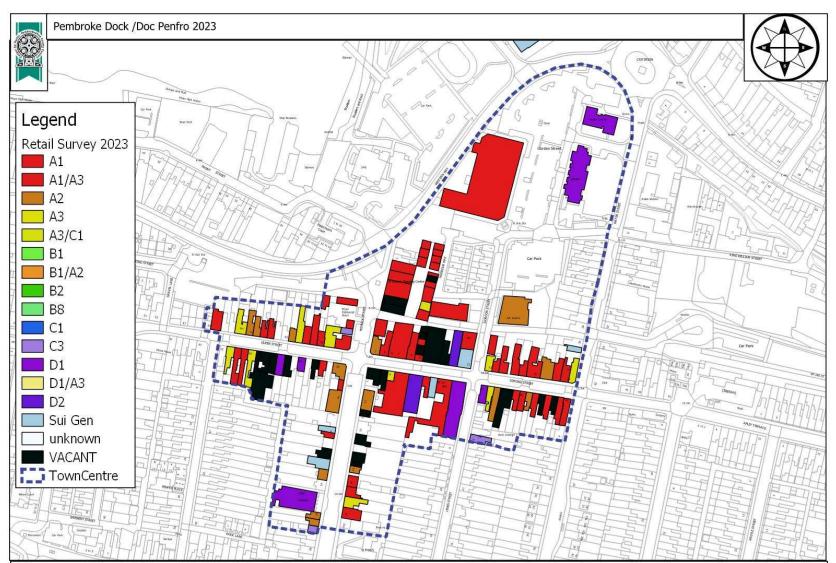


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