

REPORT OF THE HEAD OF PARK DIRECTION

SUBJECT: 2014 ANNUAL MONITORING REPORT ON THE PEMBROKESHIRE COAST NATIONAL PARK LOCAL DEVELOPMENT PLAN

Purpose of Report

The Annual Monitoring Report is a document which is produced by the Authority each October, looking back at the previous financial year, from 1 April to 31 March.

The Report should assess the extent to which the Local Development Plan strategy and policies are being achieved.

The Report measures various indicators to assess the performance of the individual planning policies set out in the adopted development plan but also to provide a general portrait of the social, economic and environmental conditions in the Park.

'Key Findings' can be found at the beginning of the document which sets out where issues have arisen and what further action is required. These issues will be addressed as part of the Local Development Plan Review.

The 2014 report was made available for comment. Pembrokeshire County Council responded and the comments received earlier this year are set out in Appendix A. Joint working continues with the County Council and an update will be provided this afternoon in the Local Development Plan review workshop.

The 2014 Monitoring Report can be found in Appendix B.

Recommendation

- 1. That the attached Annual Monitoring Report for the Local Development Plan be approved for submission to the Welsh Government by the 31st October 2015 – Appendix B.**

Background Documents

Pembrokeshire Coast National Park Local Development Plan Adopted September 2010

Local Development Plan Manual by Welsh Government

Local Development Plan Wales: Policy on Preparation of LDPs

Welsh Statutory Instrument 2005 No. 2839 The Town & Country Planning (Local Development Plan) (Wales) Regulations 2005

Local Development Plan Monitoring Report 2011, 2012, 2013,

(For further information, please contact Martina Dunne on ext 4820)

CMT

Report of: Director of Development

Date: 25 February 2015

**Pembrokeshire Coast National Park Authority Local Development Plan
Annual Monitoring Report 2014 and forthcoming Formal Review
Implications for Pembrokeshire County Council**

Purpose of the Report:

To update CMT on the implications for PCC arising from the Pembrokeshire Coast National Park Authority (PCNPA, the NPA) Local Development Plan (LDP) fourth Annual Monitoring Report (AMR) and forthcoming formal Plan Review and to agree proposed actions.

Background and context:

PCNPA LDP was adopted in 2010; PCNPA completed and submitted to Welsh Government (WG) its fourth Annual Monitoring Report in October 2014. Under the current legislative framework for LDP preparation, monitoring and review each LPA is required to review its Plan at no less than 4 yearly intervals, with more frequent review or partial review where considered necessary to address unacceptable policy performance or changing context. The Review needs to be informed by updated evidence and, as for LDP preparation, is subject to a formal Delivery Agreement, consultation, independent examination with a binding report and adoption of the Plan, as revised, by full Council.

PCNPA has used this, the fourth AMR to set out the context for Plan Review, identifying those policies or supporting guidance where it considers change may be necessary and setting out the reasons for this. PCNPA has invited comments on this fourth AMR and has programmed review, provisionally, for the end of the 2014 / 2015 financial year.

WG has consulted on proposed process changes to LDP preparation, monitoring and review and PCNPA Officers, informally, have advised that the Review may be affected by these changes and will be informed by draft regulations, anticipated in the near future. The timing is therefore dependent on publication of these draft regulations and the scope of the review on their content.

Detailed Consideration

PCNPA has concluded that alterations to its current LDP are required and the 2014 Annual Monitoring Report (AMR) indicates those areas where changes to the Plan are considered necessary.

PCNPA monitoring has identified two key areas of concern for delivery of strategy / policy and meeting objectives, namely housing supply and affordable housing, together with a number of less fundamental issues requiring changes to policy or guidance. Further information on these is set out at Appendix 1.

In the AMR PCNPA has identified specific issues with implications for PCC, including

- **Lack of progress with some allocated development sites, including some in the ownership of PCC,**

Where there is no indication of serious intent to bring forward as yet undeveloped allocations during the remainder of the Plan, PCNPA will need to identify alternative sites to satisfy the Inspector that the Plan is capable of delivering housing to meet identified need and, in particular to demonstrate that it has an effective 5 year housing land supply. This may result in de-allocation of existing allocations, including some in PCC ownership.

- **Economic Development input into PCNPA monitoring and review;**
- **Cross boundary collaboration (both local, as Pembrokeshire, and 'larger than local', including other local planning authorities in south west Wales) on employment land review in accordance with WG revised Policy, technical advice and emerging Guidance.**

Revised requirements will place an onus on authorities to consider cross boundary implications, of employment land needs, including PCC/ PCNPA, but including other authorities in south west Wales

PCC and PCNPA Planning Policy Officers have met to identify work streams where collaboration is either essential or will improve outcomes and / or secure efficiency savings, with the following actions identified:

- High Level meeting to be arranged regarding bringing forward Council owned sites in the National Park. [PCNPA Chief Executive / PCC Head of Paid Service and Director of Development]

Further key work:

- PCNPA Scale & Location of Growth & Housing Background Paper [Planning Policy Officers].
- Implications of Community Infrastructure Levy trigger date (April 2015) [Planning Policy Officers and Development Manager, Major Projects]
- Finalising the updated Local Housing Market Assessment – [Planning Policy Officers and PCC Housing Policy Officers]
- PCNPA's draft Plan Review Report [Planning Policy Officers]
- Potential benefit of a Statement of Common Ground to inform PCNPA Review [Planning Policy Officers]
- PCNPA Retail Background Paper [Planning Policy Officers]
- PCNPA Open Space Background Paper [Planning Policy Officers]
- Joint Retail Study (likely to be 2016) resources permitting [Planning Policy Officers]
- Gypsies and Travellers provision [Planning Policy Officers]

- 2015 Renewables Survey, updating that undertaken in 2014. [Planning Policy Officers, PCNPA turbines and PCC Solar].
- PCC Draft 2015 Employment Review Methodology. [Planning Policy Officers, with input as required from Regeneration Officers]
- Visitor economy, employment and rural diversification evidence base review [PCNPA PCC Planning Policy Officers and others, with input, as required, from Regeneration Officers, PCC and others].
- Pembrokeshire wide caravan site survey [PCNPA to update].
- Sub-regional work on Minerals [South West Wales Planning Policy Officers/ Minerals Officers]
- Subregional work on Waste Planning, reflecting new WG requirements [South West Wales Planning Policy Officers / Waste Planning Officers]
- Securing improved access to biodiversity data and condition information.

Financial Implications

Without an active role by PCC in PCNPA's Plan review, and reciprocal involvement by PCNPA in the eventual review of PCC's Plan neither Plan Review would clear independent examination.

PCC has a statutory responsibility to undertake the monitoring and analysis work outlined to prepare LDP annual Monitoring Reports.

The collaboration proposed is essential both in terms of wider delivery in Pembrokeshire and reputationally, to avoid any potential direction by Welsh Government as to preparation of a Joint LDP.

This policy work will result in significant officer time. However the collaboration proposed will not place an increased burden on the authority, but rather will make best use of reduced budgets to improve outcomes, in a climate of increasing expectations by WG.

Recommendation.

It is recommended that PCC responds to the consultation on the AMR, setting out, as above, the policy areas where PCC proposes further discussion / joint working.

To consider a report to Cabinet, dependent on the outcome of high level discussions between PCC and PCNPA on PCC owned housing allocations.

Project Manager:

Cath Ranson, Development Plans and Conservation Manager

Officers / external organisations consulted on the CMT report:

LDP Team

Mike Simmons, Development Manager – Major Projects

Heads of Regeneration / Property

PCNPA LDP Team

Appendix 1

Key issues identified in PCNPA's AMR

Housing Supply (indicator 21)

The 2013 Joint Housing Land Availability Study indicated that the National Park had a 2.96¹ year land supply (the minimum should be 5 years). This continues a trend of decline in housing land supply in the National Park. The NPA considers that housing land availability should improve, as a result of:

- New SPG on Affordable Housing; and
- Changes to housing land supply (Policy changes) at certain locations, through LDP Review. Settlements identified as requiring change in the land supply include Dale, Dinas Cross, Herbrandston, Solva, Tenby and Trefin.

The NPA is giving further consideration to releasing its own land holdings for housing.

Affordable Housing

The NPA identifies this as the other main area of concern, specifically in that delivery is below target. A new approach is to be taken forward in the LDP Review; in the meantime the NPA has carried out new housing viability appraisals in advance of formal review of the LDP, is reducing levels of on-site affordable housing expected and, where on-site provision isn't possible, levels of contributions are reducing. It has changed its approach on affordable housing through publication of SPG (which came into force on 01/07/14). There has also been consultation with landowners / agents.

Other issues raised in the AMR

Community Infrastructure Levy – the future introduction of a Community Infrastructure Levy would be dependent on PCC. The NPA identifies PCC as the primary, but not the sole, service provider.

Settlement Facilities

Settlement facilities have been monitored and re-classification of Nevern and Rosebush as 'Rural Centres' will be proposed at LDP review.

Accessibility

The Review will need to consider formal changes to accessibility testing to facilitate delivery of affordable housing to meet local needs at Dale, Marloes, Herbrandston and St. Ishmaels, given changes that have taken place, particularly in relation to public transport provision.

¹ This compares with a 2.66 years housing land supply in the 2014 JHLAS, published following preparation of the PCNPA AMR

Water supply

DCWW published a Water Resources Management Plan (WRMP) in April 2014. This indicates a possibility of water shortages in parts of Pembrokeshire after 2018. The WRMP puts forward some possible solutions.

Sustainable Design

The NPA proposes deletion of that part of policy 29 requiring energy efficiency improvements in the original building as well as in a proposed extension, now considered to be unworkable. Sustainable design indicator 10 [incorporation of renewable energy technology into development schemes] is to be proposed for deletion at LDP review, to be replaced with a more meaningful indicator.

Visitor Economy

The NPA proposes further research, to inform LDP review as a result of significant pressures for increasing the number of caravanning and chalet pitches.

Renewable Energy

Revision of the target for renewable heat (indicator 12b, Appendix 4) is proposed, recognising a smaller than anticipated contribution from schools using biomass boilers. Electricity generation within the National Park is ahead of LDP target, assuming that all permissions are implemented, however cumulative impact of wind turbines is becoming a common issue in some parts of the National Park.

Retailing – nationally, retail centres are showing signs of growth and falling vacancy rates. The NPA will consider the significance of any amendments made to Welsh permitted development rights / guidance in this policy area. However, it does not identify any major issues at the moment.

A number of necessary changes to be undertaken through LDP Review, resulting from national policy changes, are identified including:

- Affordable housing to meet local need
Policies 7a and 7d of the LDP need updating to allow local needs housing proposals in places not accessible, other than by private car. [To reflect provisions of TAN6 (July 2010)]
- Rural enterprise dwellings
Review of policy 7b is proposed. [to reflect opportunities introduced through TAN6]
- Sustainable design indicator 11
Deletion is proposed, as not relevant beyond the 2013/14 monitoring period. [as a result of changes to national planning policy].

- Minerals mapping
Revised Minerals Safeguarding Zones and SPG on Safeguarding Minerals Zones are proposed [Welsh Government's minerals safeguarding map for south-west Wales, prepared by BGS, post dates PCNPA Plan adoption].
- Waste
New policy and guidance will be needed. [following changes to PPW / TAN21]
- Employment
The NPA anticipates a need to revise policies 42 and 43 and to review the employment evidence base and to collaborate with PCC and with other Authorities in SW Wales for revisions arising from changes to PPW², the new TAN 23 and proposed WG Guidance.
- Marine planning
Any changes arising from the emerging Welsh National Marine Plan being developed, with adoption expected in 2015.

Sustainability Appraisal

The NPA has not identified any substantial issues with the Sustainability Appraisal Objectives for this AMR. A few issues the NPA considers to be of lesser significance are identified, reflecting the policy issues outlined above for affordable housing and sustainable design and the paucity of environmental data.

The AMR highlights the lack of up-to-date information on biodiversity and the consequential difficulty in assessing the environmental impact of the LDP. The NPA is seeking alternative information sources. There is also concern over lack of trend-based data for monitoring water quality.

² Including to allow employment sites to be considered in locations within or adjacent to rural settlements, rather than only within settlements

**Pembrokeshire Coast National Park
Authority**

Annual Monitoring Report

for the Local Development Plan




2015

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
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1. Key Findings

- 1.1. This Annual Monitoring Report assesses the effects of the Local Development Plan against those which were anticipated. This report is for the financial year April 2014 to end of March 2015.
- 1.2. This report also reflects on previous Annual Monitoring Reports in anticipation of a full review of the Local Development Plan (a full review of the Local Development Plan is programmed for the end of the financial year 2014-2015).
- 1.3. The findings of the Annual Monitoring Reports of 2011, 2012, 2013 and 2014 have been considered by the National Park Authority. The Reports have also considered the Plan's achievement of its sustainability objectives.
- 1.4. Annual monitoring indicates that some alterations to the Local Development Plan are needed.
- 1.5. The tables below provide a visual aid of the effectiveness of policies during this Annual Monitoring Report period 2014-2015 using the 37 indicators analysed in the Monitoring Report. Commentary and action points both in the interim and for review stage are provided for those that are underperforming.

Target	Number of Indicators	
Targets / objectives are being achieved.	31	
Targets have not been achieved or poor performance, but no concerns over implementation of policy / objectives - see below for a summary of the issues.	2	
Monitoring indicates area of concern over implementation of policy / objectives.	4	

Target for Housing Land Availability - Welsh Government Indicator (Indicator 21)

Policy Area		Indicator 21	Target	Performance
Housing	W	The housing land supply taken from the current Housing Land Availability Study (TAN1)	Minimum 5 years supply.	


- 1.6. The Authority is required to demonstrate a five year effectively available housing land supply and the 2015 Study¹ shows a 1.8 years. The 2014 study concluded that the National Park had a 2.66 year land supply. The 2013 study concluded that the National Park had a 2.96 year land supply which had dropped from 3.5 the previous year and 3.8 in 2011. The report uses the residual method to calculate the land supply.
- 1.7. The continuing drop in the calculated land supply is caused by a variety of factors, the most common being a lack of interest by landowners in wishing to develop their land in the short and medium term. Whilst interest in developing sites allocated in the Local Development Plan has increased significantly in the last year with a number of pre-application enquiries and planning applications made to the Authority, this has not been sufficient to make up for poor completion rates at the beginning of the Plan period.

¹ 2015 Final Report:

<http://www.pembrokeshirecoast.org.uk/Files/files/Dev%20Plans/JHLAS/PCNPA%20JHLAS%202015%20Final%20Report.pdf>

1.8. **Conclusion:** The issue will now be addressed through the review of the Plan. This will include revisiting the overall housing land requirements and consequently the Plan's housing provision and acknowledging uncertainties in the housing market in setting annual targets.


Affordable Housing Provision – Welsh Government Indicator No.22

Policy Area		Indicator 22	Target	Performance
Housing	W	The number of net additional affordable and general market dwellings built. (TAN 2)	530 affordable dwellings over the plan period. 1000 general market dwellings built. In total an annual completion rate of 90 per annum.	Actions are proposed to improve delivery 

1.9. The Authority's Local Development Plan affordable housing policy, Policy 45, is not fully achieving its key outcome in terms of the number of affordable homes anticipated as being built or under construction by the end of the financial year 2014/15 targets. The evidence shows that the delivery of affordable housing is currently falling short of the authority's targets.

1.10. **Conclusion:** The Authority has taken interim steps in advance of a full review of the Local Development Plan to address the issue. These are set out in Appendix 2 to the 2014 Annual Monitoring Report. In summary there are changes to the level of affordable housing expected. The amount is reduced. The amount expected from affordable housing contributions is generally also reduced. It is anticipated that this change in approach will be taken forward into Local Development Plan review. This will result primarily in changes to the percentage requirements for affordable housing shifting downwards in Policy 45 as set out in Appendix 2 of the 2014 Annual Monitoring Report for the various submarket areas and in the allocations listed in Tables 3 and 7 of the Local Development Plan. Please also see under Indicator 21 above for additional areas for review.





Renewable Heat Target Indicator 12b

Policy Area		Indicator 12b	Target	Performance
Renewable Energy Policy 33			(Target - Planning permissions to contribute to an overall Renewable Heat Target for the National Park of 26 GWh ² .)	

1.11. Heat Generation Per Annum Gwh (estimate) equals an estimated 3.2 Gwh primarily from solar panels. Anticipated applications for example for larger biomass boilers to schools have not been forthcoming. However a positive policy framework remains in place.

² This target taken from Appendix 4 of the Local Development Plan has been amended in a previous Annual Monitoring Report from 'between 35.2 and 40.7 GWh' to 26 GWh to reflect that many types of proposals that could previously be monitored through the planning system now have permitted development rights. Annual Monitoring Report 2013 explains in further detail. The Local Development Plan Appendix 4 will require amendment to reflect this change at formal review stage.

Allocations – 100% permitted by the end of the Plan period on allocated sites. Indicator 23

Policy Area	Indicator 23	Target	Performance
W	Amount of development, including housing, permitted on allocated sites in the development plan as a % of development plan allocations and as % of total development permitted (ha and units).	Allocations – 100% permitted by the end of the Plan period on allocated sites.	Housing (23a) 
			Employment/Mixed use (23b) 
			Community Facilities (23c) 
			Road & Cycle Schemes (23d) 

- 1.12. The trigger for review is to have 33% of the land allocations with permission by the review period (end of the financial year 2014/15).
- 1.13. **Housing Allocations:** 12.5% of land allocated for housing in terms of area has been granted planning permission; 18.4% of units allocated have planning permission. The target is not being achieved. See under Indicator 21 and 22 for actions currently being taken and will be undertaken as part of the Local Development Plan review.
- 1.14. **Employment/Mixed Uses (without housing included):** The target is to have 33% of the land allocations with permission by the review period (end of the financial year 2014/15). This is not being achieved. 3 sites are allocated and they are not progressing. Reasons include lack of interest by the landowner, lack of developer interest and issues around the viability of bringing employment sites forward where there is a lack of public funding. These sites will be reconsidered as part of the Local Development Plan review.
- 1.15. **Community Facilities:** The target is to have 33% of the land allocations with permission by the review period (end of the financial year 2014/15). Two allocations were made in the Plan for community facility provision. The target of 33% has been met as one of the allocations has been implemented. The future of the second allocation will be reconsidered as part of the Local Development Plan Review. The improvements allowed through an allocation would be achievable under Policy 48 Community Facilities and Infrastructure Requirements.
- 1.16. **Road & Cycle Schemes:** 7 Schemes are allocated. 2 schemes have been completed and can be taken out of the Plan at review stage (RI2 and RI7). 3 schemes require discussion with Pembrokeshire County Council as part of the Local Development Plan review as future intentions appear to be changing RI1, RI3, and RI4. Work is being planned on the remaining 2 schemes (RI5 and RI6).
- 1.17. **Conclusion:** Please see Indicators 21 and 21 for recommendations regarding housing. A review of the employment/mixed use allocations shown in Table 1 and 2 Appendix 2 of this Monitoring Report will be undertaken as part of the Local Development Plan Review. The allocation for community facilities at Saundersfoot Railway Station will also be reviewed as part of the Local Development Plan review. The Authority will discuss any revisions or updates required to the list of schemes listed in Table 4 Road & Cycle Schemes Appendix 2 with the County Council as highway authority.
- 1.18. Below are additional issues arising from this fourth and previous monitoring reports along with a list of proposed actions and or proposals for alteration in response:
- a) **Settlement Facilities:** In anticipation of Local Development Plan review the facilities available in settlements around the National Park are being checked. The results of the survey work so far suggest that there will be a need to add Nevern and Rosebush as rural centres in the settlement

hierarchy at review stage. (Chapter 2, of the 2014 Monitoring Report refers)

- b) **Policy 7a) and Policy 7d):** Regarding the spatial strategy the Local Development Plan has largely directed new development to identified Centres where there are a range of facilities and services available. Outside the Centres development in the countryside is limited to conversion of appropriate buildings or infill and rounding off in groups of settlements. The ability of the site users to reach services and facilities by means other than private car is an important consideration in such cases and the Authority's Supplementary Planning Guidance adopted in June 2013 sets out how this is assessed. The approach to assessing accessibility on a case by case basis using the criteria contained in the guidance is proving to be challenging in an essentially rural planning authority. This issue will be considered as part of the the Local Development Plan review. (Chapter 2 of this Monitoring Report refers) ³
- c) **Policy 7b) Rural enterprise dwellings:** being permitted (previously only referred to as agricultural and forestry dwellings): Policy 7 of the Local Development Plan will require a technical update at formal review stage to take account of this widening of opportunities). Current applications are being considered under this more recent national policy and guidance. (Annual Monitoring Report 2011 refers)
- d) **Policy 29 Sustainable Design:** That element of the policy which required energy efficiency improvements being sought in the original building as well as a proposed extension has not proved workable and is no longer being implemented by the Authority. It requires deletion from the Plan at review stage. (Annual Monitoring Report 2012 refers). ³
- e) The reasoned justification to the policy will also require updating at review stage to refer to the new national planning policy context (Chapter 2C of the 2014 Monitoring Report refers)
- f) **Sustainable Design Indicator 10:** The Indicator which refers to incorporating renewable energy technology with a scheme is proposed for deletion at review stage. It is not being monitored by the Authority. (Annual Monitoring Report 2011 refers). A revised indicator for Local Development Plan Policy 29 Sustainable Design will be produced at formal review stage, to enable a meaningful monitoring of the policy in contributing towards sustainable design in all development, replacing current Indicators 10 and 11.
- g) **Sustainable Design Indicator 11:** Changes to national planning policy has resulted in this indicator no longer being relevant. This indicator will require deletion at review stage from the Plan's Appendix 4. (Chapter 2C of the 2014 Monitoring Report refers). A revised indicator for Local Development Plan Policy 29 Sustainable Design will be produced at formal review stage, to enable a meaningful monitoring of the policy in contributing towards sustainable design in all development, replacing current Indicators 10 and 11. ³
- h) **Renewable Energy Target:** The target for renewable heat under Indicator 12b has been updated to reflect the estimated target contribution from those proposals that require planning permission in the Annual Monitoring Report 2013. The Local Development Plan, Appendix 4 will require an update too. Please also see below for 'Targets for Renewable Energy'.
- i) **Targets for Renewable Energy:** The targets within Indicators 12a and 12b were derived from a study entitled 'Development of a Renewable Energy Assessment and Target Information for the Pembrokeshire Coast Local Development Plan' (2008). This study considered the potential capacity for various types of renewable electricity and heat production technologies in the context of the National Park landscape, their economic potential and likely uptake, the potential for community based schemes and the limitations and opportunities of the electricity distribution network. Based on this information the study provided contribution estimates for each technology up to 2021 (Indicators 12a and 12b represent the total estimates). To inform the Local Development Plan Review and to enable the continued monitoring of policy performance, an update to the study will be required to review the uptake of certain technologies, identify technologies where limited further capacity exists, identify new technologies and to provide a new set of predicted contributions for the reviewed plan new end date. ³ (Chapter 2 E Climate change, sustainable design, flooding, sustainable energy of this Annual Monitoring Report refers)

³ (for ³ see Sustainability Appraisal commentary below)

- j) **Minerals Mapping:** The Welsh Government has published a map for South West Wales, which details the location and extent of mineral resources for the whole region and highlights those that should be safeguarded, it includes the recommended separation distances advised within Minerals Technical Advice Note 1 Aggregates. In terms of its implications, the Authority's minerals safeguarding zones has been checked and updated accordingly in the constraints mapping for development management purposes and will be reflected in the Local Development Plan at review (Annual Monitoring Report 2013 refers). The 'Safeguarding Minerals Zones' Supplementary Planning Guidance has also been updated accordingly.
- k) **Waste:** Welsh Government has recast national planning policy. The principles and policies contained in Planning Policy Wales and Technical Advice Note 21: Waste (2001) have now been revised to set out the strategic and spatial role of land use planning in facilitating these new waste management priorities, objectives and targets. This new policy and guidance will need consideration at Plan review stage and taken account of in the interim. (Chapter 2B of the 2014 Monitoring Report refers)
- Waste cont'd:** The construction of a new Civic Amenity and Recycling Centre on land at Devonshire Drive, Saundersfoot (planning reference 13/1110/PA, approved 24th June 2014) is now complete and the site is operational. The text relating to the Salterns site in Tenby, within paragraph 4.120 of the LDP will require updating to reflect this new context. (Chapter 2B of this Monitoring Report refers)
- l) **Scrutiny Report on Economic Activity:** A report by the Joint Scrutiny Committee on the impact of the policies and work of the National Park Authorities on the economic activity (for Snowdonia & Pembrokeshire National Park Authorities) was agreed by this Authority on the 29th July 2015. The relevant recommendations will be taken into account in the Local Development Plan review. (Chapter 2D, of this Monitoring Report refers)
- m) **Employment:** Taking account of recent national planning policy changes a review of the Local Development Plan evidence base will need to be undertaken for the first Plan review. The existing evidence base was prepared in full consultation with a variety of stakeholders but in particular Pembrokeshire County Council who provide the economic development role for the whole of Pembrokeshire, including the National Park. In light of the direction for strategic collaboration between authorities this will need to be considered through discussion with other authorities in the region. (Chapter 2D of the 2014 Monitoring report refers)
- n) **Policies 42 Employment Sites & Live/Work Units** sets out criteria against which speculative proposals for employment uses are considered, acknowledging, guidance provided by national planning policy. The revised Chapter 7 of Planning Policy Wales Edition 7 allows employment sites to be considered within or adjacent to identified rural settlements and this is a matter that will require updating through the review of the Local Development Plan, which currently directs proposals to appropriate locations within Centres or through building conversion in the countryside. In the interim, the updated national planning policy approach will be a material consideration in planning applications coming forward. (Chapter 2D of the 2014 Monitoring Report refers)
- o) **Chalet, Caravan and Camping Sites:** There has been a long-held policy of restraint on new chalet, caravan and camping sites in the National Park dating from the Dyfed Structure Plan. Part of the rationale for this approach was the potential impact on the National Park landscape and also a knowledge that there were a number of sites in the National Park with some capacity for further development. The latest survey based on 2013/14 shows however, that the available capacity has reduced and this has been coupled with increasing demand for new sites, additional pitches on existing sites and change over from touring/camping pitches to static caravan pitches. The Authority is also receiving regular notifications of sites operating without planning permission. This is testing the current policy position. A consultant has been commissioned to assess the capacity of the National Park landscape to absorb additional chalet, caravan and camping sites and pitches. The outcome of the study, which is expected in autumn 2015 will be used to inform the relevant policies of the Plan and whether any changes can be made. (Chapter 2d of this Monitoring Report refers) ❏

Sustainability Appraisal

- 1.19. An analysis of how the Plan is contributing to the sustainability appraisal objectives can be found in Chapter 3.
- 1.20. An analysis of how the Local Development Plan is contributing to the Sustainability Appraisal Objectives has

identified no substantial issues for this monitoring period. Within the scope of the Local Development Plan, and its associated supplementary planning guidance documents, it is generally contributing positively to the Sustainability Appraisal Objectives. However, some issues have been identified that may become more significant in the future if they are not monitored and addressed in a sustainable manner in the near future. These issues are highlighted with a ☒ symbol above.

- 1.21. **Environmental data:** Since the last monitoring report was issued the National Park Authority has established a monitoring strategy to capture biodiversity data from planning applications where an application has included biodiversity enhancements e.g. bat boxes. In addition the National Park Authority also carries out its own conservation work programme on approximately 100 sites across the National Park and issues an annual monitoring report on this, which provides valuable context on the state of biodiversity in the National Park. However, there is still a notable gap in the availability of condition data for statutory nature designations.

Consultation and Further Information

- 1.22. The Monitoring Report is made available to relevant statutory bodies, stakeholders and individuals and is published on the Authority's web site. Comments on the 2015 document are invited and will inform the production of the next report in 2016 and the Local Development Plan review. Any comments and queries relating to this Monitoring Report should be addressed to:

Park Direction Service

Pembrokeshire Coast National Park Authority

Llanion Park

Pembroke Dock

Pembrokeshire

SA72 6DY

Tel 0845 345 7275

email devplans@pembrokeshirecoast.org.uk

Consultation on the 2014 Monitoring Report




- 1.23. The 2014 Monitoring Report was made available for comment to relevant statutory bodies, stakeholders and individuals and was published on the Authority's web site. No adverse comment was received.

2. Strategy – Where we want to be – Are we getting there?

2.1 This chapter identifies any key contextual issues arising and how the Plan's policies are performing against the key outcomes anticipated. The analysis is grouped under the overarching National Park Purposes and Duty (and spatial strategy) and then the six key priority areas:

- a. Special qualities
- b. Major development, the potential for growth
- c. Climate change, sustainable design, flooding, sustainable energy
- d. Visitor economy, employment, and rural diversification
- e. Affordable housing and housing growth
- f. Community facilities, retailing, transport

2.2 First the key outcomes anticipated are listed, followed by an analysis of any contextual issues of significance. Finally the policies of the Plan are assessed to the extent to which they are being implemented as intended, and whether objectives are being achieved. As a visual aid in monitoring the effectiveness of policies and to provide an overview of performance, key indicators and outcomes are highlighted as follows:

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

2.3 Triggers are also included within the policy analysis to ensure that a detailed review is undertaken of the effectiveness of the policy and any external influences when the trigger is met. Any recommendations for a review of the policies or plan as a result of the detailed assessment will be set out in the Annual Monitoring Report.

Source of Indicator	
Local Development Plan	
Local Development Plan Manual	
Welsh Government Core Indicator	W

National Park Purposes and Duty and the Spatial Strategy


Key Outcomes


- (1) Development takes place in accord with the strategy of the Local Development Plan.
- (2) Development permitted helps to sustain local communities - for example by ensuring a significant element contributes to affordable housing provision or provides employment opportunities.

Context

2.4 Policy 7a) and 7d) Countryside: Regarding the spatial strategy the Local Development Plan has largely directed new development to identified Centres where there are a range of facilities and services available. Outside the Centres development in the countryside is limited to conversion of appropriate buildings or infill and rounding off in groups of settlements. The ability of the site users to reach services and facilities by means other than private car is an important consideration in such cases and the Authority's Supplementary Planning Guidance adopted in June 2013⁴ sets out how this is assessed. The approach to assessing accessibility on a case by case basis using the criteria contained in the guidance is proving to be challenging in an essentially rural planning authority. This issue will be considered as part of the the Local Development Plan review.

Policy Performance


Policy Area	Indicator 1	Target	Performance
All	Approvals contrary to recommendation.	0 approvals contrary to recommendation	
<p>Trigger: 3% of planning applications⁵ decided contrary to recommendation in any one year.</p> <p>Reason: To identify patterns over the Annual Monitoring Report period.</p> <p>Analysis: During the period April 2014 to March 2015 630 planning applications were determined by the National Park Authority. 0.6% of applications (4) were approved contrary to recommendation.</p> <p>Conclusion: The National Park Authority's application of policy positively supports the strategy of the Plan and achieving its key outcomes.</p>			


Policy Area	Indicator 2	Target	Performance
National Park Purpose s & Duty	Developments which engage the Sandford Principle – where conflict between the two national park purposes becomes acute, the first one must prevail. Carrying out the socio-economic duty in National Parks must be in pursuance of the purposes to Policy 1 (overarching indicator).	Target - 0 approvals within or impacting on the National Park which breach the Sandford principle or which result in conflicts between the duty and purposes. (overarching target)	

⁴ Progress on Supplementary Planning Guidance is listed in Appendix 1.

⁵ Full, outline or reserved matters applications.


<p>Trigger: 0 application approved contrary to the Sandford Principle in any one year.</p> <p>Reason: The Sandford Principle is a central component of the National Park purposes and 1995 Environment Act.</p> <p>Analysis: No planning applications with a decision date between 1 April 2014 and 31 March 2015 have engaged or breached the Sandford principle.</p> <p>Conclusion: The National Park Authority's application of policy positively supports the strategy of the Plan and achieving its key outcomes.</p>
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Policy Area	Indicator 3a	Target	Performance
Policy 35c) (Strategy Policy)	Policy 35c) Prioritising affordable housing over self catering	Target - 0 approvals contrary to policies that prioritise certain uses seen to sustain communities in the plan.	
<p>Trigger: Approval of 2 applications contrary to policy 35 c) in any one year.</p> <p>Reason: This policy provides a windfall opportunity for affordable housing, and with limited land available for development early scrutiny of the policy is appropriate.</p> <p>Analysis: There were no applications approved contrary to policy 35c during this monitoring period.</p> <p>Conclusion: The National Park Authority's application of policy positively supports the strategy of the Plan and achieving its key outcomes.</p>			

Policy Area	Indicator 3b	Target	Performance
Policy 42d) & Policy 44 third last paragraph	Policy 42d) & Policy 44 third last paragraph - Prioritise community uses or affordable housing when re-using employment sites.	0 approvals contrary to policies seen to protect and provide for community facilities and infrastructure	
<p>Trigger: Approval of 2 planning applications contrary to the policy 42d) or Policy 44 third last paragraph in any one year.</p> <p>Reason: The National Park does not contain many large scale employment uses and their loss to other uses must continue to support the local community. They are valuable to individual communities and a stringent threshold is appropriate.</p> <p>Analysis: No approvals contrary to this policy were recorded during 2014 to 2015 monitoring period.</p> <p>Conclusion: The National Park Authority's application of policy positively supports the strategy of the Plan and achieving its key outcomes.</p>			

Policy Area	Indicator 3c	Target	Performance
Policy 45 & Policy 42	Housing & Employment	Use targets for the delivery of affordable housing and employment.	
Please see analysis under Indicators 16 and 22.			

Policy Area	Indicator 3d	Target	Performance
Policy 48	Community Facilities & Infrastructure Requirements.	0 approvals contrary to policies seen to protect and provide for community facilities and infrastructure	
Please see analysis under Indicator 26.			

Policy Area	Indicator 4	Target	Performance
	Effectiveness of Policies (Policy 2 to 7) & Supplementary Planning Guidance (Accessibility Assessment) when dealing with Applications at Appeals.	Inspector does not raise issues regarding the effectiveness of the policies or supporting supplementary planning guidance.	
<p>Analysis: In the period April 2014 to March 2015 a total of seven appeal decisions cited Local Development Plan policies and Supplementary Planning Guidance within this group, although four of these were on the same site for four separate dwellings, all four appeals were dealt with under a single hearing session and decision. Two cited Policy 2 'Tenby Local Service and Tourism Centre' and five cited Policy 7 'Countryside'. Of the seven, one appeal was allowed. This was based on the Inspector having a different judgement over the impact of a housing development in Tenby for two houses and two flats on the character of the surrounding area and highway safety. Whilst this also occurred in other appeal decisions, these were dismissed as they were found to conflict with Local Development Plan policies outside of this Indicator's group.</p> <p>Conclusion: No appeal decisions dispute the appropriateness of the policies for consideration in these decisions. There does not seem to be a pattern emerging in which these policies are contested by Inspectors.</p>			

2A Special Qualities


Key outcome


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

Context

2.5 Sky Quality Survey: In order to raise the profile of the National Park's night skies, the National Park Authority commissioned a Sky Quality Survey (2015) with the aim of identifying potential Dark Sky Discovery sites. Dark Sky Discovery Sites are places that are away from the worst of any local light pollution, provide good sightlines of the sky, and have good public access, including firm ground for wheelchairs. 17 potential sites were identified in the Survey, and 9 of these have initially been put forward for nomination. The Survey provides a number of general recommendations, including a commentary on potential supplementary planning guidance on lighting, drawing attention to the Brecon Beacons National Park Authority's Supplementary Planning Guidance on Obtrusive Lighting. This requires programming when resources permit.

Policy Performance

Policy Area	Indicator 5	Target	Information source
Policy 8 (Strategy Policy)	Approvals contrary to Strategy Policy 8 Special Qualities. Approvals contrary to Recommendation.	0 approvals	
<p>Trigger: 2 developments permitted contrary to any criterion in any one year.</p> <p>Reason: The Special Qualities are central to National Park Purposes set out in the Environment Act 1995.</p> <p>Analysis: In the period 1st April 2014 to 31st March 2015, there were no approvals contrary to recommendation which referred to Policy 8. This has decreased from two in the previous annual monitoring report period.</p> <p>Conclusion: Decisions made have been consistent with Policy.</p>			

Policy Area	Indicator 6	Target	Performance
	Effectiveness of Policies (Policy 1 and Policies 8 to 18) & Supplementary Planning Guidance (Landscape Character, Conservation Area Proposals, Regionally Important Geodiversity Sites and Historic Environment) when dealing with Applications at Appeals.	Inspector does not raise issues regarding the effectiveness of the policies or supporting supplementary planning guidance.	
<p>Analysis: In the period April 2014 to March 2015, ten appeal decisions cited Local Development Plan policies and Supplementary Planning Guidance within this group. Three cited Policy 1 'National Park Purposes and Duty', five cited Policy 8 'Special Qualities', two cited Policy 9 'Light Pollution', three cited Policy 11 'Protection of Biodiversity', one cited Policy 13 'Historic Landscapes, Parks and</p>			

Gardens' and four cited Policy 15 'Conservation of the Pembrokeshire Coast National Park'. Five cited the 'Landscape Character Assessment' Supplementary Planning Guidance (four of these related to the same site, see Indicator 4 Analysis). Of the six decisions, two were allowed.

Both of these allowed appeals resulted from a difference in Inspector judgement on the impact of the schemes on the character of their surrounding areas and special qualities of the National Park landscape. One was in relation to a housing development in Tenby for two houses and two flats (referred to in Indicator 4 analysis). The other proposal was for a replacement dwelling in Porthgain. The Inspectors considered both proposals to be in accordance with the Local Development Plan policies in this regard.

Whilst this difference in judgement also occurred in other appeal decisions, these were dismissed as they were found to conflict with Local Development Plan policies outside of this Indicator's group.

Conclusion: No appeal decisions dispute the appropriateness of the policies for consideration in these decisions. There does not seem to be a pattern emerging in which these policies are contested by Inspectors. The allowed appeals were as result of differing judgements by the Inspectors on design and landscape character impact considerations, rather than disagreeing with the Local Development Plan policies.

2B Major development, the potential for growth

Key outcomes

- (1) No new major development in the National Park unless there are exceptional circumstances.⁶
- (2) The provision of waste facilities to cater for National Park generated needs or to work with the County Council to provide waste facilities serving both areas outside the National Park.


Context


- 2.6 **Minerals:** Major infrastructure projects that may put additional pressure on existing reserves include the Swansea Tidal Lagoon (granted a Development Consent Order in July 2015). There are other tidal lagoon proposals in the Bristol Channel. The 'Circuit of Wales' proposal and the M4 Newport relief road, if developed will also create major demand for minerals.
- 2.7 A new Direction has been issued by Welsh Government to require that any planning application for onshore gas or oil development which proposes to use unconventional methods (including hydraulic fracturing) to stimulate extraction for any stage of development (exploration, appraisal, or commercial extraction) be referred where local planning authorities are minded to approve them. This new direction will apply to any application for planning permission registered as valid on or after 16th February 2015. A letter dated 14th August from the Minister re-affirms a precautionary policy approach to hydraulic fracturing and that the Welsh Government's vision for energy in Wales is based on renewable energy. This followed from recent UK Government announcements on changes in the planning system to expedite shale gas exploration, which apply to England only.⁷
- 2.8 **Waste:** The construction of a new Civic Amenity and Recycling Centre on land at Devonshire Drive, Saundersfoot (planning reference 13/1110/PA, approved 24th June 2014) is now complete and the site is operational. This site lies within Pembrokeshire County Council jurisdiction. It has replaced the former Salterns Civic Amenity site within Tenby. It serves communities both in the and outside the National Park. The new facility will provide greater capacity for the collection and segregation of municipal waste and will contribute towards the Council (as the waste collection authority) achieving European and national waste treatment targets. The text relating to the Salterns site in Tenby, within paragraph 4.120 of the Local Development Plan will require updating to reflect this new context. Recent meetings with Pembrokeshire County Council Waste Management Officers has identified no need in the foreseeable future for additional waste management facilities within the National Park.
- 2.9 **Marine planning:** Welsh Government is developing a Welsh National Marine Plan (WNMP), a single plan for inshore and offshore Welsh waters. The UK's Marine Policy Statement (March 2011) provides the high level context for the Welsh National Marine Plan. The Marine Policy Statement states that marine planning systems will sit alongside and interact with existing planning regimes – including local development plans - across the UK. A Strategic Scoping Exercise has been undertaken to review and interpret available and relevant evidence for Welsh seas. The programmed adoption date for the Welsh National Marine Plan is in 2015.


⁶ See [Planning Policy Wales, Edition 7, July 2014](#), paragraph 5.5.6; [Minerals Planning Policy Wales, December 2000](#), paragraph 21, page 11; [Minerals Technical Advice Note 1: Aggregates 2004](#), paragraph 52; [Mineral Technical Advice Note \(MTAN\) Wales 2: Coal](#), paragraphs 74 to 79, page 159, [South West Wales, Regional Waste Plan 1st Review \(August 2008\)](#); [Circular 125/77 Roads and Traffic – National Parks](#).

⁷ <http://gov.wales/topics/planning/policy/dear-cpo-letters/unconventional-oil-and-gas/?lang=en>

Policy Performance

Policy Area	Indicator 7	Target	Performance
Major development	Approvals of proposals that engage Major Development Test	0 approval of major development unless exceptional circumstances are proven.	
<p>Trigger: Approval of 1 major development where no exceptional circumstances are shown in any one year.</p> <p>Reason: To ensure a consistent approach with first purpose and Planning Policy Wales Major development test.</p> <p>Analysis: Between April 1st 2014 and March 31st 2015 no application for a major development was approved.</p> <p>Conclusion: There are no issues arising regarding the policy framework of the Plan.</p>			

Policy Area	Indicator 8	Target	Performance
Minerals	Applications for minerals development	0 approval for new minerals development unless exceptional circumstances are proven.	
<p>Trigger: 1 new or extended mineral site permitted when exceptional circumstances are not shown in any one year.</p> <p>Reason: This would have a major impact on the minerals strategy. The trigger would not include borrow pits.</p> <p>Analysis: There has been no approvals between April 2014 to March 2015 for a new or extended mineral site.</p> <p>Conclusion: There are no issues arising.</p>			

Policy Area	Indicator 9	Target	Performance
	Effectiveness of Policies (Policies 19 to 28) & Supplementary Planning Guidance (Land Instability from coal workings Safeguarding Minerals,) when dealing with Applications at Appeals	Inspector does not raise issues regarding the effectiveness of the policies or supporting supplementary planning guidance.	
<p>Analysis: In the period April 2014 to March 2015 no Inspectorate appeal decisions refer to these policies or relevant supplementary planning guidance in their decision making.</p> <p>Conclusion: No conclusion about effectiveness can be made.</p>			

2C Climate change, sustainable design, flooding, sustainable energy

Key outcomes

1. Development achieving high standards in terms of sustainable design. with all new dwellings meeting the standards set out in national planning policy.⁸
2. The National Park contributing to renewable energy generation.⁹
3. No vulnerable development¹⁰ in areas which would be at risk of flooding both now and in the long term and with no negative impacts elsewhere.

Context

2.10 Targets for Renewable Energy: The targets within Indicators 12a and 12b were derived from a study entitled 'Development of a Renewable Energy Assessment and Target Information for the Pembrokeshire Coast Local Development Plan' (2008). This study considered the potential capacity for various types of renewable electricity and heat production technologies in the context of the National Park landscape, their economic potential and likely uptake, the potential for community based schemes and the limitations and opportunities of the electricity distribution network. Based on this information the study provided contribution estimates for each technology up to 2021 (Indicators 12a and 12b represent the total estimates). To inform the Local Development Plan Review and to enable the continued monitoring of policy performance, an update to the study will be required to review the uptake of certain technologies, identify technologies where limited further capacity exists, identify new technologies and to provide a new set of predicted contributions for the reviewed plan new end date.

Policy Performance

Policy Area	Indicator 10	Target	Performance
Sustainable Design Policy 29	Incorporation of renewable energy technology within scheme	Relevant schemes incorporating renewable energy technologies.	N/A
<p>Given the emphasis in Technical Advice Note 12, July 2014 on developers needing to look to achieve the minimum carbon standard through passive design and energy efficiency first, before considering how further emission savings can be achieved through the use of low and zero carbon energy technologies this indicator is no longer considered appropriate. (paragraph 5.4.4 of Technical Advice Note). A revised indicator for Local Development Plan. Policy 29 Sustainable Design will be produced at formal review stage, to enable a meaningful monitoring of the policy in contributing towards sustainable design in all development.</p>			

Policy Area	Indicator 11	Target	Performance
Sustainable Design Policy 29	Compliance with code for sustainable homes ¹¹	Target - 100% meeting national policy requirements	N/A



⁸ The Welsh Government expects the required standards to be made progressively higher over time, in pursuit of its aspiration for all new buildings to be "carbon neutral" by 2011.

⁹ Please see the Monitoring Section of the Plan. Likely contributions are taken from the Renewable Energy Assessment weblink: <http://www.pcnpa.org.uk/website/default.asp?SID=1317&SkinID=5>

¹⁰ 'Vulnerable developments' are defined in the Technical Advice Note 15: Development and Flood Risk on flooding, please see Figure 2 page 7: weblink [http://new.wales.gov.uk/docrepos/40382/epc/planning/403821/40382/403821/\(560\)_july04-tan15-e.pdf?lang=en](http://new.wales.gov.uk/docrepos/40382/epc/planning/403821/40382/403821/(560)_july04-tan15-e.pdf?lang=en)

¹¹ This includes better management of surface water run-off to cope with the impacts of climate change.
Pembrokeshire Coast National Park Local Development Plan

Policy Area	Indicator 11	Target	Performance
Trigger: failure to achieve across 100% of residential developments			
Reason: Requirement of Planning Policy Wales Technical Advice Note 22: Planning for Sustainable Buildings.			
Analysis/Conclusion: This indicator is no longer relevant for this monitoring period, due to the changes to national planning policy described above in paragraph 2.17. A revised indicator for Local Development Plan Policy 29 Sustainable Design will be produced at formal review stage, to enable a meaningful monitoring of the policy in contributing towards sustainable design in all development.			

Policy Area	Indicator 12a	Target	Performance
Renewable Energy Policy 33	Capacity of renewable energy schemes permitted and completed.	Planning permissions to contribute to an overall Renewable Electricity Target for the National Park of 4.91GWh.	
Policy Area	Indicator 12b	Target	Performance
Renewable Energy Policy 33		(Target - Planning permissions to contribute to an overall Renewable Heat Target for the National Park of 26 GWh ¹² .)	

No triggers have been identified for the above. There are two main difficulties with monitoring renewable energy provision. Firstly renewable energy generated from micro household renewable schemes and small scale non domestic schemes are allowed as permitted development and secondly applicants do not currently need to provide information in respect of the renewable energy capacity associated with their planning application. There is also difficulty in distinguishing whether the panels are for electricity generation or heating water. Biomass in particular is seen as a potentially significant contributor to the renewable heat targets in the Plan and generally enjoys permitted development rights.

Nevertheless the Authority will continue to monitor the provision of renewable energy schemes where permission is required. Some estimates are necessary where information is lacking.


Analysis: Electricity Generation Gwh (estimate) equals an estimated 3.58 Gwh if all the permissions granted since 2006 are implemented. The proposals are primarily for wind turbines and photovoltaics.

Heat Generation Per Annum Gwh (estimate) equals an estimated 3.7 Gwh primarily from solar panels. Anticipated applications for example for larger biomass boilers to schools have not been forthcoming. However a positive policy framework remains in place.

The approach to Plan policy preparation was to ensure that the Authority was encouraging and supportive of renewables unless there are overriding environmental or amenity issues. An analysis of approvals versus refusals shows that since 2006 there have been an estimated 31 refusals of permission and 148 approvals for various types of renewable energy. Local Development Plan Policy 33 was quoted in a total of twenty five decisions in this monitoring period, mainly on schemes which incorporated renewable energy technology as part

¹² This target taken from Appendix 4 of the Local Development Plan has been amended in this Annual Monitoring Report from 'between 35.2 and 40.7 GWh' to 26 GWh to reflect that many types of proposals that could previously be monitored through the planning system now have permitted development rights. Annual Monitoring Report 2013 explains in further detail. The Local Development Plan Appendix 4 will require amendment to reflect this change at formal review stage. Please also see commentary in the context section above.

Policy Area	Indicator 12a	Target	Performance
of a wider proposal.			
<p>Conclusion: Even though permitted development rights mean that all proposals cannot be counted the Plan is ahead of potential target on electricity generation (if all those with permission are assumed to have been constructed) but significantly behind on heat generation. The sum of estimated contributions from solar thermal, biomass and heat pumps have formulated the above heat generation target. See also commentary on revising targets at the beginning of this chapter.</p>			

Policy Area	Indicator 12c	Target	Performance
Renewable Energy Policy 33	Renewable Energy Supplementary Planning Guidance and Cumulative Impact of Wind Turbines on Landscape and Visual Amenity Supplementary Planning Guidance	All decision making is consistent with the Authority's Renewable Energy Supplementary Planning Guidance and Cumulative Impact of Wind Turbines on Landscape and Visual Amenity Supplementary Planning Guidance	


Trigger: 3 or more decisions contrary to the principles set out within the Renewable Energy supplementary planning guidance.

Reason: Although the contribution provided by renewables is important it is difficult to monitor (see above). A more meaningful measure is how effective the Renewable Energy Supplementary Planning Guidance will be (adopted October 2011,) in providing a supportive context for renewables provision while protecting the special qualities of the National Park. Deciding applications contrary to this Supplementary Planning Guidance should trigger a review.



Analysis: A review of permissions granted and refused for renewable energy schemes during the monitoring period (April 2014 to March 2015) shows that there has been one refusal of permission and one approval. Both applications related to ground mounted solar arrays. The refusal related to a domestic array, sited within non residential land and as such was refused on principle by creating an undesirable extension of curtilage into the countryside, rather than the visual impact of the panels themselves. Neither decision conflicts with the Supplementary Planning Guidance.


There were no applications for wind turbines received within this period and as such, the 'Cumulative Impact of Wind Turbines on Landscape and Visual Amenity' Supplementary Planning Guidance has not been cited. There was a significantly lower number of applications for renewable energy developments within this monitoring period in comparison with the previous year, a reduction from fourteen to two respectively. The previous Annual Monitoring Report also reported a significant reduction from twenty nine applications in the previous period. This decrease in the number of proposals over recent years may in part be attributed to the increase in micro and commercial schemes comprising permitted development, reductions in revenue from Feed in Tarrifs have also been experienced during this period, which the Authority has no control over. The Renewable Energy Supplementary Guidance was quoted in a total of eight decisions.

Conclusion: The policy context and supplementary planning guidance continues to provide a positive framework for renewable energy generation. The cumulative impact of wind turbines in certain areas of the National Park is becoming more of a common issue to address, although this has not been exacerbated during this last monitoring period as no wind turbine applications have been received.

Policy Area	Indicator 13	Target	Performance
Flooding	W Amount of development (by TAN 15 paragraph 5.1 development	Development is not permitted where the long term scenario	

Policy Area		Indicator 13	Target	Performance
Policy 34		category) permitted in C1 and C2 floodplain areas not meeting all TAN 15 tests (paragraph 6.2 i-v)	(in the next 60 years) would fail the tests set out above.	
<p>Trigger: 1 development permitted contrary to Policy 34.</p> <p>Reason: Can be severe consequences of inappropriate development. This is a Welsh Government indicator.</p> <p>Analysis: All applications within areas identified by Technical Advice Note 15 or Shoreline Management Plan as having potential for flooding have been screened by Natural Resources Wales (formerly the Environment Agency). No proposals have been permitted contrary to Policy 34 of the Plan.</p> <p>Conclusion: The policy context set out in Technical Advice Note 15 and the Local Development Plan is providing an appropriate framework to minimise the future risk of flooding.</p>				

Policy Area		Indicator 14	Target	Performance
Location of Growth	W	Percent of new development permitted on previously developed land.	33% of the housing land supply on previously developed land. 45% of the employment land on previously developed land.	Housing  Employment 
<p>Trigger: Failure to achieve the targets of 33% and 45% by the formal plan review period.</p> <p>Reason: Limited supply of development land, means an assessment would be appropriate.</p> <p>Analysis:</p> <p>Housing: 17.2% of residential units completed are on greenfield sites and 82.8% on brownfield sites. The Plan well ahead of the target for residential permitted.</p> <p>Employment related uses: The proportion of applications approved on greenfield sites was 38% and 62% on brown field. The target has been met. In terms of land area the percentages are 36% and 64% respectively. The target has been achieved here also.</p> <p>Conclusion: No change is required in approach to achieve brownfield targets for housing or for employment related uses.</p>				

Policy Area		Indicator 15	Target	Performance
		Effectiveness of Policies (Policy 29 to 34) & Supplementary Planning Guidance (Sustainable Design Guidance, Renewable Energy) at Appeals and when dealing with Applications	Inspector does not raise issues regarding the effectiveness of the policies or supporting supplementary planning guidance.	

Policy Area	Indicator 15	Target	Performance
<p>Analysis: In the period April 2014 to March 2015, six appeal decisions cited Local Development Plan policies and Supplementary Planning Guidance within this group. Two decisions cited Policy 29 'Sustainable Design', four decisions cited Policy 30 'Amenity' and four cited Policy 33 'Renewable Energy'. One decision cited the 'Sustainable Design' Supplementary Planning Guidance, two cited the 'Renewable Energy' Supplementary Planning Guidance and one cited the 'Cumulative Impact of Wind Turbines on Landscape and Visual Amenity' Supplementary Planning Guidance. Of the six appeals, two were allowed.</p> <p>Of the two allowed appeals, one was for 16 ground mounted solar panels in an agricultural field for residential use. The Inspector did not consider the panels to cause an unacceptable impact upon the surrounding landscape. The second appeal has been previously noted under Indicator 6 of this Report, where the Inspector allowed a replacement dwelling in Porthgain after considering it to cause no unacceptable impact upon the surrounding landscape character or visual amenity of the area.</p> <p>Conclusion: No appeal decisions dispute the appropriateness of the policies for consideration in these decisions. There does not seem to be a pattern emerging in which these policies are contested by Inspectors. The allowed appeals were as result of differing judgements by the Inspectors on design and landscape impact considerations, rather than disagreeing with the Local Development Plan policies.</p>			

2D Visitor economy, employment and rural diversification

Key outcomes

- a) New employment, live/work and mixed use sites provided (estimated 5.6 hectares) and existing sites safeguarded.
- b) A range of holiday accommodation is available to meet the varying needs of visitors
- c) Recreational and visitor activities do not damage the special qualities of the National Park

Context

2.11 **Scrutiny Report on Economic Activity:** A report by the Joint Scrutiny Committee on the impact of the policies and work of the National Park Authorities on the economic activity (for Snowdonia & Pembrokeshire National Park Authorities) was agreed by this Authority on the 29th July 2015. The relevant recommendations will be taken into account in the Local Development Plan review. The recommendations which refer directly to Local Development Plan policies are:

a) National Park Authority policies need to be drawn up with a degree of tolerance and sufficient flexibility so as to be able to take into account changing economic and market circumstances and the differing needs of business, or to be in place for a shorter time period which would allow more regular refreshment and updating.

b) National Park Authorities should seek to develop closer working relationships with Local Authority economic development teams. There should be an agreed focus and action plan to jointly address the identified needs. Likewise Local Authority economic development departments should fully embrace the potential of protected areas in driving economic benefits. This would provide a focus to assess the impact of future policies and actions with particular reference to the imminent review of Local Development Plans.

c) The contribution and impact of the wider work of National Park Authorities on the business community should be recognised. Policies such as those to provide affordable housing and accessibility should be monitored, reviewed and amended, where necessary, to take account of the reality of living in rural Wales, with limited public transport availability.



2.12 Regarding recommendation 'a' the Local Development Plan is required to meet the tests of soundness. Test CE4 advises that the Plan needs to be reasonably flexible to enable it to deal with changing circumstances. The guidance also advises that the Plan also needs to have policies written that enable them to provide a robust and consistent framework for considering planning applications. These matters will be addressed again through review and will be tested again through Examination. The review process is dictated by Welsh Government policy and guidance. Regarding 'b' Officers of the Authority continue to liaise with Pembrokeshire County Council's economic development officers and planning officers as part of the review. Recommendations given will be addressed through the review process. Regarding 'c' the review of affordable housing policy is considered in Chapter 2E of this Annual Monitoring Report and accessibility issues are acknowledged in Chapter 2. See commentary on Policy 7a) and 7d) Countryside.


2.13 **Chalet, Caravan and Camping Sites:** There has been a long-held policy of restraint on new chalet, caravan and camping sites in the National Park dating from the Dyfed Structure Plan. Part of the rationale for this approach was the potential impact on the National Park landscape and also a knowledge that there were a number of sites in the National Park with some capacity for further development. The latest survey based on 2013/14 shows however, that the available capacity has reduced and this has been coupled with increasing demand for new sites, additional pitches on existing sites and change over from touring/camping pitches to static caravan pitches. The Authority is also receiving regular notifications of sites operating without planning permission. This is testing the current policy position. A consultant has been commissioned to assess the capacity of the National Park landscape to absorb additional chalet, caravan and camping sites and pitches. The outcome of the study, which is expected in Autumn 2015 will be used to inform the relevant policies of the Plan and whether any changes can be made.


2.14 **Employment Sites Review:** As a planning authority the National Park Authority can allocate or protect land and buildings for employment use but is unable to provide new industrial units. Land identified for employment use will require significant investment in infrastructure and services. There is a concern that reduced public

sector funding will discourage private sector investment and limit the amount of land that is readily available for development. Indicator 23 in the next chapter (Chapter 2E) provides a commentary on progress with site allocations for employment uses and mixed use allocations including a need to review the appropriateness of their inclusion in some instances. Greater focus on criteria based planning policy should ensure flexibility to address employers/developers needs with due regard to environmental and other constraints. Deleting employment allocations will not preclude the consideration of sites within or adjacent to the identified Centres of the National Park up to 2 hectares in size.

Policy Performance

Policy Area	Indicator 17	Target	Performance
Policy 43	Loss of employment sites	0 approvals of loss of employment sites except where justified within the terms of the policy.	
<p>Trigger: Loss of two or more employment sites or 500 sq metres contrary to recommendation</p> <p>Reason: Small employment sites can make an important contribution to sustainable communities.</p> <p>Analysis: One application which resulted in the temporary loss of an employment site was approved contrary to officer recommendation during this monitoring period. Permission was granted on a former garage site in Tenby for its use as a temporary car park. This was the second temporary permission for this use at this site.</p> <p>Conclusion: Whilst the permission was contrary to the Local Development Plan, permission granted was temporary which will allow the long-term use of the site to be reconsidered in due course.</p>			
Policy Area	Indicator 18	Target	Performance
Visitor Accommodation Policy 35	Counts of hotel spaces, self catering, caravan and camping spaces (Hotels, self catering, caravan databases etc).	Maintain current levels of provision except where loss of hotel proven.	
<p>Trigger: 1 or more developments contrary to recommendation in any one year.</p> <p>Reason: The impact of such development changes on National Park purposes. There is a need to maintain current provision.</p> <p>Analysis: There have been no planning application approved contrary to policy in respect of camping sites during the monitoring period. There have been 4 Certificates of Lawfulness issued for caravan and camping sites which amount to a total of 230 tent pitches; 20 touring caravan pitches; 15 unit (touring caravan or tent) pitches; and 3 camping pods. There have been no applications approved contrary to policy in respect of hotels and self-catering provision during the monitoring period.</p> <p>Conclusion: A high number of enquiries and applications to the Authority to increase the number of caravanning and chalet pitches, through the change of existing touring/camping pitches and new sites has continued during this monitoring period. The above commentary also highlights a trend towards unauthorised camping and caravanning developments which are achieving certificates of lawfulness and the overall result has significant potential to jeopardise the policy position. The policy approach to camping and caravanning will be considered through Local Development Plan review.</p> <p>Conclusion: No appeal decisions dispute the appropriateness of the policies under Indicator 20 for consideration. There does not seem to be a pattern emerging in which these policies are contested by Inspectors.</p>			

Policy Area		Indicator 19	Target	Performance
Special Qualities		Proposals for recreational activity contrary to Policy 8.	Target 0 approvals	
Policy 8				
<p>Trigger: 2 or more recreational activity developments contrary to the Recreational Activities Supplementary Planning Guidance</p> <p>Reason: The special qualities (Environment Act 1995) could be significantly affected by such development.</p> <p>Analysis: The target has been met during the monitoring period with 0 approvals contrary to Policy 8 and the Recreation and Leisure Activities Supplementary Planning Guidance (2013-2014).</p> <p>Conclusion: Decisions made have consistent with policy.</p>				

Policy Area		Indicator 20	Target	Performance
		Effectiveness of Policies (Policy 35 to 43) & Supplementary Planning Guidance (Recreational Activities, Loss of Hotels) when dealing with Applications and at Appeals	Inspector does not raise issues regarding the effectiveness of the policies or supporting supplementary planning guidance.	
<p>Analysis:</p> <p>In the period April 2014 to March 2015, one appeal decision cited Local Development Plan policies and Supplementary Planning Guidance within this group. The appeal decision cited Local Development Plan Policy 35 'Visitor Economy' (amongst others) in respect of a new tourism and recreational facility in Tenby. The appeal was dismissed on biodiversity grounds. The Inspector found no reason to dispute the Local Development Plan policy in making the decision, although did differ in judgement over the design, amenity and quality of the submitted appeal, finding many elements of the proposal to be acceptable in this regard.</p> <p>Conclusion: No appeal decisions dispute the appropriateness of the policies under Indicator 20 for consideration. There does not seem to be a pattern emerging in which these policies are contested by Inspectors.</p>				

2E Affordable housing and housing growth

Key outcomes

- (1) An estimated 1,600 new dwellings are provided of which a minimum of 530 new affordable homes are provided.
- (2) If by the end of the financial year 2014/15 the number of affordable homes built or under construction is below 80% of the proportion of the overall target for the Plan period which should be available by that date, the Authority will immediately commence a review of the Affordable Housing Strategy Policy.
- (3) A higher density of development is achieved – a minimum of 30 dwellings to the hectare in the Local Development Plan's Centres¹³.


Context

2.15 Housing Market: The nature of the housing market over the lifespan of the Local Development Plan is and will be the subject of much conjecture and conflicting forecasts. The link below provides detailed commentary on housing starts and completions in Wales recently.¹⁴

2.16 Supplementary Planning Guidance Affordable Housing: The guidance sets out the circumstances where it will be necessary to review the guidance through monitoring of key indicators (see section 6). This exercise was carried out in January 2015. Considering the current evidence and trends a full review of the guidance is not be required at this time. There has been no single change in any one indicator meeting the threshold of 10% and no two indicators have changed by 5-9%. The Authority's 2014 Annual Monitoring Report sets out the areas for review required to the Authority's Local Development Plan affordable housing policy, Policy 45 under the forthcoming Local Development Plan Review.

2.17 Water Supply: Dwr Cymru published its final Water Resources Management Plan in April 2014. The Water Resources Management Plan highlights a possibility of water shortages for parts of the County after 2018. Solutions to this emerging problem are suggested within the Plan and are further referenced in the draft AMP6 Plan. Dwr Cymru has not advised of any water shortage issues during the Local Development Plan period and this is not listed as a constraint to any of the sites allocated in the Plan. It will, however require continual liaison, particularly as we move towards the later years of the Plan period.

Policy Performance

Policy Area		Indicator 21	Target	Performance
Housing	W	The housing land supply taken from the current Housing Land Availability Study (TAN1)	Minimum 5 years supply.	
Trigger: Less than a 5 year supply in any one year.				
Reason: It is important to deliver the affordable housing strategy.				
Analysis: The Authority is required to demonstrate a five year effectively available housing land supply. The 2015 Study shows a 1.8 years. The 2014 study concluded that the National Park had a 2.66 year land supply. The report uses the residual method to calculate the land supply. The 2013 study concluded that the National Park had a 2.96 year land supply which had dropped from 3.5 the previous year and 3.8 in 2011. The continuing fall in the calculated land supply is caused by a variety of factors, the most common being a lack of interest by landowners in wishing to develop their land in the short and medium term. Interest in developing				

¹³ See Local Development Plan.Glossary of Terms

¹⁴ <http://gov.wales/statistics-and-research/new-house-building/?lang=en>

sites allocated in the Local Development Plan has shown a marked increase in the last year with a number of pre-application enquiries and planning applications made to the Authority. This has not been sufficient, however, to meet the cumulative shortfall of sites coming forward in the first few years of the Plan adoption and is now a matter for the Local Development Plan review.

Appendix 2 advises on the current position regarding allocated sites, i.e, whether they have permission or are completed; whether they are being actively promoted by landowners or whether there appears to be significant issues with bringing the sites forward.


For Local Development Plan review this will also include revisiting the overall housing land requirements and consequently the Plan's housing provision and acknowledging uncertainties in the housing market in setting annual targets.

To help bring sites forward the National Park Authority is continuing with the following actions:

- a) Approving planning applications for housing developments provided all relevant policy considerations are met. The majority of applications submitted to the Authority in the past few years have been on small sites which are not listed in the land supply. Site visits undertaken in 2014 and beginning of April 2015 continue to show an increase in the level of activity on small sites and on some of the larger sites which will be recorded in the 2016 Land Availability study.
- b) The updated Supplementary Planning Guidance on Affordable Housing adopted by the Authority in November 2014 has re-examined viability assessments for allocated sites. It has also streamlined the process for applicants and emphasised that the requirements are a basis for negotiation. There has been an increase in the number of landowners of allocated sites making contact with the Authority with a view to bringing sites forward for development since the adoption of the guidance.
- c) The Authority has a continuing dialogue with owners of many of the land allocations in the Park. Several of the landowners are undertaking preparatory work to start bringing sites forward for development and will be reflected in the 2015 Land Availability Study.
- d) The Authority will be reviewing site allocations through the Local Development Plan review to address the shortfall in effectively available land.

More commentary on completion rates is detailed below under the analysis of Indicator 22.

Conclusion: For Local Development Plan review this will mean revisiting the overall housing land requirements and consequently the Plan's housing provision and acknowledging uncertainties in the housing market in setting annual targets.

Policy Area		Indicator 22	Target	Performance
Housing	W	The number of net additional affordable and general market dwellings built. (TAN 2)	530 affordable dwellings over the plan period. 1000 general market dwellings built. In total an annual completion rate of 90 per annum.	Actions are proposed to improve delivery 





Trigger: If by the end of the financial year 2014/15 the number of affordable homes built or under construction is below 80% of the proportion of the overall target for the Plan period which should be available by that date, the Authority will immediately commence a review of the Affordable Housing Strategy Policy.

Reason: Milestone contained in the Inspector's report on the Local Development Plan.

Analysis: As this element of the Plan is a key component of the Plan a commentary is provided here on progress to date.

Policy Area	Indicator 22	Target	Performance	
<p>The target for affordable housing delivery in the Local Development Plan is 530 affordable houses over the Plan period with 80% of the provision planned for delivery by the end of the financial year 2014/2015 to be either built or under construction. This would mean that an estimated 228 affordable dwellings would need to have been built between 2007 and 2015 or be under construction. This would be an estimated 28 affordable dwellings to be completed annually to achieve the Plan's target provision.</p>				
<p>The publication of the Authority's new Supplementary Planning Guidance on Affordable Housing effective from mid 2014 means that the affordable housing contributions anticipated in the adopted Plan as set out in the Local Development Plan will not be realised. This will require review as part of the Local Development Plan review.</p>				
<p>Between 2007 and 2015 a total of 81 affordable dwellings have either been completed or are under construction 36% of the target.</p>				
<p>Overall completions totalled 463, 64% of the overall target. The issue of overprovision will need to be addressed in the Local Development Plan review.</p>				
<p>The table below provides a breakdown. For Local Development Plan review this will include revisiting the overall housing land requirements and consequently the Plan's housing provision and acknowledging uncertainties in the housing market in setting annual targets.</p>				
	Target Annual Completions	Completions Recorded	Target Annual Affordable Completions or u/c	Affordable Completions or u/c recorded
2007-2008	90	105	28	7
2008-2009	90	86	28	15
2009-2010	90	37	28	12
2010-2011	90	27	28	3
2011-2012	90	36	28	0
2012-2013	90	38	28	0
2013-2014	90	44	28	3
2014-2015	90	90	28	41
Total	720	463	224	81
<p>On affordable housing contributions as at July 2015 £287,069 is due for payment and £74,536 has been collected. On some permissions the detail of payments has not been agreed. This is the case for 8 permissions. The contributions due for these permissions will be calculated at reserve matters stage and are not included in the figures above.</p>				
<p>This element of affordable housing provision is intended as a minor part of the affordable housing provision for the Plan period.</p>				
<p>Conclusion: The Authority's Local Development Plan affordable housing policy, Policy 45, is not fully achieving its key outcome in terms of the number of affordable homes anticipated as being built or under construction by the end of the financial year 2014/15 targets. The evidence shows that the delivery of affordable housing is currently falling short of the authority's targets.</p>				
<p>The Authority has taken interim steps in advance of a full review of the Local Development Plan to address the issue. These are set out in the Authority's supplementary planning guidance on affordable housing adopted in November 2014. In summary there are changes to the level of affordable housing expected. The amount is reduced. The amount expected from affordable housing contributions is generally also reduced. It is anticipated that this change in approach will be taken forward into Local Development Plan review.</p>				
<p>This will result primarily in changes to the percentage requirements for affordable housing shifting downwards in Policy 45 as set out in Appendix 2 (of the 2014 Monitoring Report) for the various submarket areas and in the allocations listed in Tables 3 and 7 of the Local Development Plan.</p>				

Policy Area	Indicator 22	Target	Performance
Please also see under Indicator 21 above for additional areas for review.			

Policy Area	Indicator 23	Target	Performance
	W Amount of development, including housing, permitted on allocated sites in the development plan as a % of development plan allocations and as % of total development permitted (ha and units).	Allocations – 100% permitted by the end of the Plan period on allocated sites.	Housing (23a) 
			Employment/Mixed use (23b) 
			Community Facilities (23c) 
			Road & Cycle Schemes (23d) 
	W And as a percentage of total development permitted.	No target specified in the Plan.	See commentary below.

Trigger: Failure to achieve 33% of the first target by the formal plan review period.

Reason: To allow land an opportunity to come forward means an assessment at this stage would be in appropriate.

Analysis: Allocations in the Plan are for:


- Allocations with Housing (Table 1 Appendix 2 to this report)
- Employment/Mixed Uses (includes live/work) (Table 2)
- Community Facilities (Table 3)
- Road & Cycle Schemes (Table 4)

Allocations with Housing (Table 1): The target is to have 33% of the land allocations with permission by the review period (end of the financial year 2014/15). 12.5% of land allocated in terms of area has been granted planning permission; 18.4% of units allocated have planning permission. The target is not being achieved. See under Indicator 21 and 22 for actions currently being taken and will be undertaken as part of the Local Development Plan review.

There is no target specified for the amount of residential units permitted on allocated sites as a percentage of all residential permitted since Plan adoption. The number permitted on non allocated sites shows that in line with actions identified under Indicator 21 to improve land availability allocated sites provide for 57% of the units permitted and non allocated sites for 43%.

Employment/Mixed Uses – excludes mixed use listed in Table 1 Appendix 2 (Table 2): The target is to have 33% of the land allocations with permission by the review period (end of the financial year 2014/15). This is not being achieved here. 3 sites are allocated and they are not progressing.

Policy Area	Indicator 23	Target	Performance
			<p>Reasons include lack of interest by the landowner, lack of developer interest and issues around the viability of bringing employment sites forward where there is a lack of public funding. These sites will be reconsidered as part of the Local Development Plan review.</p> <p>693 applications were approved for employment related uses in the Plan period so far and these were not on allocated sites.</p> <p>Community Facilities (Table 3): The target is to have 33% of the land allocations with permission by the review period (end of the financial year 2014/15). Two allocations were made in the Plan for community facility provision. The target of 33% has been met as one of the allocations has been implemented. The future of the second allocation will be reconsidered as part of the Local Development Plan Review. The improvements allowed through an allocation would be achievable under Policy 48 Community Facilities and Infrastructure Requirements.</p> <p>In terms of permissions granted for new or improved community facilities there have been 28 planning permissions granted since the Plan was adopted which shows a supportive policy context for such uses.</p> <p>Road & Cycle Schemes (Table 4): 7 Schemes are allocated. 2 schemes have been completed and can be taken out of the Plan at review stage (RI2 and RI7). 3 schemes require discussion with Pembrokeshire County Council as part of the Local Development Plan review as future intentions appear to be changing RI1, RI3, and RI4. Work is being planned on the remaining 2 schemes (RI5 and RI6).</p> <p>Much of the work done for such schemes does not require planning permission and therefore there is no record of permissions granted for such schemes since adoption of the Local Development Plan.</p> <p>Conclusion: Please see Indicators 21 and 21 for recommendations regarding housing. A review of the employment/mixed use allocations shown in Table 1 and 2 Appendix 2 will be undertaken as part of the Local Development Plan Review. The allocation for community facilities CP829 at Saundersfoot Railway Station will also be reviewed as part of the Local Development Plan review. The Authority will discuss any revisions required to the list of schemes listed in Table 4 Road & Cycle Schemes Appendix 2 with the County Council as highway authority.</p>


Policy Area	Indicator 24	Target	Performance
Policy 44	W Average density of housing development permitted on allocated development plan sites. ¹⁵	30 per hectare target in the Plan Centres achieved.	
<p>Trigger: 2 or more housing developments not achieving 30 dwellings to the hectare.</p> <p>Reason: To make the best use of available land.</p> <p>Analysis: During this monitoring period planning permission was granted for 3 residential site allocations. In each case the number of dwellings permitted exceeded the number allocated in the Plan:</p> <ul style="list-style-type: none"> Former Depot Site, Crymych – allocated for 15 dwellings; 18 granted permission; South of Driftwood Close, Broad Haven – allocated for 8 dwellings; 10 granted permission; 			

¹⁵ Policy 44 second last paragraph requires a density of 30 dwellings per hectare on housing developments in Centres not just on housing allocations.

- Rear of Cross Park, New Hedges – allocated for 30 dwellings; 31 granted permission.

This has provided a total of 59 dwellings (including 24 affordable dwellings) on sites allocated for 53 dwellings.

Conclusion: No pattern is emerging to cause concern.

Policy Area	Indicator 25	Target	Performance
	Effectiveness of Policies (Policy 44 to 47) & Supplementary Planning Guidance (Affordable Housing, Low Impact Development making a Positive Contribution) when dealing with Applications and at Appeals	Inspector does not raise issues regarding the effectiveness of the policies or supporting supplementary planning guidance.	

Analysis: In the period April 2014 to March 2015 six decisions cited Local Development Plan policies or Supplementary Planning Guidance in this group. All decisions cited both Policy 45 ‘Affordable Housing’ and the ‘Affordable Housing’ Supplementary Planning Guidance. All six appeals were dismissed, however four of these decisions relate to the same site (see Indicator 4 analysis).

Five of the appeals were dismissed on affordable housing grounds as they were found to conflict with Policy 45 ‘Affordable Housing’ and the ‘Affordable Housing’ Supplementary Planning Guidance, due to either a lack of contribution or evidence to prove financial unviability if subjected to the policy requirements.

The other appeal was dismissed on grounds outside of this Indicator’s group. There was no contention between the Authority and applicant on affordable housing grounds at the time of the appeal.

Conclusion: No appeal decisions dispute the appropriateness of the policies for consideration in these decisions. There does not seem to be a pattern emerging in which these policies are contested by Inspectors.

2F Community Facilities, Retailing and Transport

Key outcomes

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

Context

- 2.18 **Retailing:** The recent National Retail Barometer study indicates that retail centres are showing signs of growth, with growing consumer confidence and falling vacancy rates since 2012/2013 data. The current UK average vacant floorspace in town and city centres is 9.5%, the vacant units are at 13%.¹⁶ The Department for Local Government and Communities released a consultation document, which sought to change the permitted development rights for the change of use of properties outside of prime retail locations. The proposals reflected the advice of the [Portas Review](#), which recommended more flexibility for change of use, and would help the high street, rural communities and local retailers by increasing footfall and spending.¹⁷ New permitted development rights for shops in England have subsequently been published in April 2014 under The Town and Country Planning (General Permitted Development) (Amendment and Consequential Provisions) (England) Order 2014. These rights provide a prior approval process for the conversion of retail units to residential use in town centres¹⁸. In Wales The Town and Country Planning (General Permitted Development) (Amendment) (Wales) Order 2014 introduced new rights for shops, although these did not include a change of use to residential¹⁹.
- 2.19 Welsh Government have published a study entitled 'Town Centres and Retail Dynamics: Towards a Revised Retail Planning Policy for Wales' (April 2014)²⁰. This study provides a quantitative and qualitative analysis of retail in Wales, using a number of case study centres. It makes a number of policy recommendations for the update of national retail planning policy and guidance. These focus on providing consistent application of key policy tests and controls for non-centric retail development (for example on the sequential test), providing a more flexible approach to supporting the vitality and viability of town centres (extending 'town centre first' approach to other forms of development, introducing new A4 and A5 use classes, providing greater clarity on primary and secondary town centre areas) and providing a more locally driven approach to centre definitions and hierarchies (deletion of the centre types identified in TAN 4, more precise terminology). The implications of any updates to national policy resulting from this and other studies will need to be considered as part of the formal Local Development Plan Review.
- 2.20 Welsh Government have also consulted on a proposal to introduce subordinate legislation to bring mezzanine extensions greater than 200m² into planning control, as is the case with England²¹.
- 2.21 **Community Infrastructure Levy:** Community Infrastructure Regulations provide a transitional period after which planning obligations designed to collect pooled contributions from 5 or more developments may not be used to provide infrastructure which could be funded from Community Infrastructure Levy, or on the local adoption of the levy if this is before the end of the transitional period. Analysis shows that this threshold has not been reached to date.
- 2.22 In the longer term the preparation of a Community Infrastructure Levy will be heavily dependent on the County Council as the primary service provider. Raising awareness and liaising with the Council will be essential. The latest amendments to the Community Infrastructure Levy regulations came into force on the 24th February 2014. These include limiting the pooling of S106 until April 2015. Pembrokeshire County Council's Cabinet of the 20th

¹⁶ <http://www.colliers.com/sitecore/shell/-/media/files/emea/uk/research/retail/20140924-national-retail-%20barometer-web-3.pdf>

¹⁷ <https://www.gov.uk/government/consultations/greater-flexibilities-for-change-of-use>

¹⁸ <http://www.planningresource.co.uk/article/1285256/shop-conversion-regulations-published>

¹⁹ <http://www.planningresource.co.uk/article/1287641/town-country-planning-general-permitted-development-amendment-wales-order-2014>


²⁰ <http://gov.wales/topics/planning/planningresearch/publishedresearch/town-centres-and-retail-dynamics/?lang=en>


²¹ <http://gov.wales/consultations/planning/planning-and-compulsory-purchase-act-2004/?lang=en>


of April 2015 note the changes to Section 106 Agreements with effect from 5 April 2015 and the proposal to undertake a detailed assessment of the merits or otherwise of adopting a Community Infrastructure Levy Charging Schedule. Pembrokeshire Coast National Park Authority will contribute to that commission.

- 2.23 Community Infrastructure Levy is not intended to replace S106 Agreements (S106s). It subsumes many of the matters that are currently addressed through S106s. S106s, however, will remain in force and will deliver provision that cannot otherwise be realised through Community Infrastructure Levy. The principle uses for S106s would be the delivery of affordable housing and the mitigation of the direct effects of development.
- 2.24 Supplementary Planning Guidance has been prepared by the Authority on Planning Obligations. To ensure the Authority is not unlawfully securing obligations from March 2015 Officers of the Authority have requested that Pembrokeshire County Council when seeking planning obligations under the above guidance ensures the planning obligations requested relates directly to the development.

Policy Performance


Policy Area	Indicator 26	Target	Performance
Community Facilities Policy 48	Number of approvals for loss of community facilities	0 unless justified by policy framework	
Trigger: 1 or more community facilities lost contrary to recommendation.			
Reason: Communities facilities are important to community sustainability.			
Analysis: No applications determined between 1 st April 2014 and 31 th March 2015 linked to Policy 48 resulted in a community facility being lost contrary to recommendation.			
Commentary is provided on sites allocated for community facilities in Appendix 2.			
Conclusion: No need to review.			


Policy Area	Indicator 27	Target	Performance
Community Facilities Policy 48	Number of Planning Obligations for community facilities secured from development. (or financial contributions)	S106 agreements secured in line with Supplementary Planning Guidance	
Trigger: More than 2 applications decided contrary to the recommendation.			
Reason: To secure improvement in community facility provision.			
Analysis: There has been no applications decided contrary to recommendation during the monitoring period. (2014 to 2015)			
Conclusion: There are no issues arising as the trigger has not been met.			


Policy Area	Indicator 28	Target	Performance
	W Amount of greenfield and open space lost to development (ha) which	Greenfield - 0 % except for exceptional land released for affordable housing or community facility provision.	

		is not allocated in the plan.	Open Space lost - 0 % except where, with playing fields, facilities can be best retained and enhanced through the redevelopment of a small part of the site or alternative provision can be made of equivalent benefit or there is excess provision in the area.)	
Trigger: 1 or more inappropriate developments granted permission contrary to recommendation in any one year.				
Reason: The cumulative loss of green field land should be assessed to ensure that opportunities for brownfield development are not being overlooked. This is also a Welsh Government indicator.				
Analysis: Twenty-three applications were approved which included the development of greenfield land during the monitoring period This amounted to the development of 8.4ha of greenfield land.				
Of the 23 applications:				
<ul style="list-style-type: none"> • 8 were for agricultural buildings including stores and livestock sheds; • 3 were for campsites, all of which were granted a Certificate of Lawfulness; • 3 were for dwellings on infill sites amounting to 3 market dwellings and 1 affordable dwelling. One of these was approved contrary to officer recommendation; • 1 was for allotment sheds; • 2 were for stables; • 2 were for rural enterprise dwellings; • 1 was the exceptional release of land for the provision of 8 affordable dwellings; • 1 was for a polytunnel; • 1 was for a replacement school; • 1 for for a toilet and washroom. 				
Conclusion: Of these applications, 5 were granted a Certificate of Lawfulness, 3 of which were for camping/caravanning sites which would have been contrary to policy if planning permission were sought through the normal route. (Please see commentary under Context for Chapter 2d regarding the need to review policy on this topic). One of the dwellings granted permission was a Committee decision following an Officer recommendation that it should be refused as it was not in an accessible location. (Please see under Context for Chapter 2 regarding the need to review policy on this topic).				
The remainder of the applications were approved in accordance with the Local Development Plan. The school in Tenby was approved on one of the existing school playing fields. The loss of the open space will be compensated in part once the former school is demolished and the land restored as a playing field. The loss of playing field space in this instance will be 4,215sqm. There is sufficient remaining playing field space in Tenby.				

Policy Area		Indicator 29	Target	Performance
	W	Amount of greenfield and open space lost to development (ha) which is not allocated in the plan.	Open Space lost - 0 % except where, with playing fields, facilities can be best retained and enhanced through the redevelopment of a small part of the site or alternative provision can be made of equivalent benefit or there is excess provision in the area.	N/A
Trigger: 1 or more inappropriate developments granted permission contrary to recommendation in any one year.				
Reason: The loss of open space unless justified leads to the undermining of the sustainability of local communities. This is also a Welsh Government indicator.				
Analysis: This is a duplicate of Indicator 28. No analysis is done.				
Conclusion: See Indicator 28.				

Policy Area		Indicator 30	Target	Performance
Retail Policy 48		Percentage of vacant retail floor space.	No greater than 10%.	
<p>Trigger: Greater than 10% vacant A use class floorspace within retail centres for 2 consecutive years.</p> <p>Reason: Vacancy in centres naturally fluctuates and allows for new ventures to come forward. Sustained relatively high vacancy for National Park centres should be assessed further.</p> <p>Analysis: Across the centres of Tenby, Saundersfoot, St Davids, Solva and Newport, and for all A use class units, the average vacant floorspace is 3.5% at 2015. This is below the UK average of 9.5%²². A break down of vacant floorspace percentage by centre is as follows, Newport 0%, Saundersfoot 6.2%, St Davids 3.1%, Solva 0% and Tenby 3.5%.</p> <p>Conclusion: No issues arise regarding vacancy rates in the National Park's retail centres. Tenby, Solva and Newport have less vacant floorspace than the previous year. St Davids is unchanged. Saundersfoot has shown a slight increase in vacancy rates, although still less than the above trigger.</p>				


Policy Area		Indicator 31	Target	Performance
Transport Policy 52		Approvals for development without providing appropriate access for vehicles, cyclists and pedestrians.	0	
<p>Trigger: 1 or more developments approved contrary to Policy 52 recommendation in any one year.</p> <p>Reason: These are essential for developments to go ahead.</p> <p>Analysis: There have been no developments given planning permission without providing appropriate access for vehicles, cyclists and pedestrians (2014-2015).</p> <p>Conclusion: There are no issues arising.</p>				


Policy Area		Indicator 32	Target	Performance
Policy 52		Approvals for development causing significant concerns regarding potential transport impacts.	0	
<p>Trigger: 1 or more applications approved causing significant traffic impact concerns</p> <p>Reason: Significant concerns will impact on communities and will require assessment.</p> <p>Analysis: One application within this monitoring period was approved contrary to Officer recommendation. The application was for a second temporary permission of 3 years to use a former garage site in the centre of Tenby</p>				

²² <http://www.colliers.com/sitecore/shell/-/media/files/emea/uk/research/retail/20140924-national-retail-%20barometer-web-3.pdf>

as a car park. The Highway Authority had objected to the application on the basis that there was a lack of evidence to support the need for further car parking spaces in Tenby and that additional traffic would be encouraged into the town centre. This would be contrary to the traffic and parking management strategy to remove inappropriate parking and trips to and from Tenby, where traffic congestion is already an issue. Members considered issues of the permission being for an extension to the temporary period whilst the long term future of the site was considered by the landowner. Members also noted that the site offered easy access for people with disabilities (4 blue badge spaces were provided in the car park) and that this outweighed the Highway Authority and other policy objections and the car park was approved for 3 years.

Conclusion: The decision was made on the basis of short-term gain judged by Members to be more pragmatic solution, than the wider strategy and long-term planning of the area as set out in the Local Development Plan and the County Council's transport strategy within Tenby. It is difficult to see how the Local Development Plan can be changed to protect against further such decisions. In this instance the permission is for a 3-year period, although a previous, similar permission provided to give the landowner time to prepare a proposal for the site within the policy framework did not come to fruition. Background information to support the Plan strategy, including an up-to-date picture of parking and traffic issues in Tenby will be updated through the Plan Review.

Policy Area	Indicator 33	Target	Performance
Waste	Amount of waste management capacity permitted expressed as a percentage of total capacity required, as identified in the Regional Waste Plan.	1.5 hectares or 100% (if not provided for outside the National Park in conjunction with Pembrokeshire County Council's provision.	
Trigger: Application/s approved for 50% provision (0.75 hectare) by first formal review – 2014.			
Reason: Significant concerns will impact on communities and will require assessment.			
Analysis: A two hectare Civic Amenity Site has been developed and is now operational outside of the National Park on Devonshire Drive, Crane Cross. This site has replaced the former Salterns Civic Amenity Site in Tenby (see Chapter 2B of this report).			
Conclusion: Due to the changes in national policy, there is no longer a need to monitor the provision of waste management capacity based on land take (see paragraphs 2.13 – 2.19 of the 2014 Annual Monitoring Report). Updates are required to Local Development Plan Policies 27 'Local Waste Management Facilities' and 28 'Composting' to reflect the new national policy context. A new indicator to monitor the performance of these updated policies will be included as part of the formal Local Development Plan review.			

Policy Area	Indicator 34	Target	Performance
	Effectiveness of Policies (Policy 48 to 56) & Supplementary Planning Guidance (Planning Obligations) when dealing with Appeals	No issues arise from any appeal decisions regarding the effectiveness of the Plan's policies.	
Analysis: In the period April 2014 to March 2015, two appeal decisions cited Local Development Plan policies and associated Supplementary Planning Guidance within this group. One appeal decision cited Policy 49 'Retail in the National Park', one cited Policy 50 'Town and District Shopping Centres', two cited Policy 52 'Sustainable Transport' and one cited Policy 53 'Impacts of Traffic'. One decision also cited the 'Parking Standards' Supplementary Planning Guidance.			
One of the appeal decisions related to a new tourism and recreational facility on St Catherines Island in Tenby			

(also referred to in the analysis of Indicator 20 of this report). In this decision the Inspector differed in judgement over a number of planning considerations from the Authority, including whether the level of detail submitted with the proposal was sufficient to assess design and amenity considerations. The Inspector, whilst not contesting Local Development Plan Policies 49 and 50, did not consider the proposed retail element of the scheme to cause a detrimental impact upon Tenby town centre. He also considered that the proposal complied with Local Development Plan Policy 52 as accessibility was inherently limited by the physical constraints of the island. This appeal was subsequently dismissed however on biodiversity grounds.

The other appeal decision was for a residential development of four dwellings within Tenby town centre (also referred to in the analysis of Indicators 4 and 6 of this report). The Inspector did not agree that the proposal for ground floor parking conflicted with Local Development Plan Policies 52 and 53, concluding that vehicles could enter and leave the site safely. The fall back position of the buildings being used for commercial deliveries in association with the retail units was afforded significant weight. The Inspector also considered that, as the parking would be hidden from view, the proposal did not conflict with the 'Parking Standards' Supplementary Planning Guidance, which allocated the area in question as a 'Zone 1' area, which allows no additional parking in the interests of conserving the street scene character of areas.

Conclusion: No appeal decisions dispute the appropriateness of the policies for consideration in these decisions. There does not seem to be a pattern emerging in which these policies are contested by Inspectors. The allowed appeals were as result of differing judgements by the Inspectors, rather than disagreeing with the Local Development Plan policies.

3. Sustainability Appraisal Monitoring

3.1 Below is an analysis of whether the plan is contributing to the sustainability appraisal objectives.

Objective Number	Sustainability Objective
1	<p>Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well-being.</p> <p>Figures from Stats Wales for “Work place employment by Welsh Local Authority areas and broad industry” indicate that the medium trend since (2001-2013) for employment rates in agriculture, forestry and fishing in Pembrokeshire is increasing.</p> <p>In 2011 Pembrokeshire County Council released “The State of Wildlife in Pembrokeshire” (on behalf of the Pembrokeshire Biodiversity Partnership); The report suggested that biodiversity associated with agriculture is generally in decline (though there are some improvements in arable habitats). More recent publications seem to support the conclusions of this 2011 report.</p> <p>The State of Nature reports (2013) report that, across the UK, farmland birds and butterflies have declined substantially since the 1970s and 1990s respectively. 14% of all farmland flowering species and 11% of woodland flowering species are on the UK Red List of threatened species.</p> <p>In Wales, 57% of flowering plants, and half the species of butterflies assessed, are declining. Breeding birds in farmed habitats in Wales have been lost at an alarming rate, although woodland bird numbers appear to have stabilised.</p> <p>The Pembrokeshire Biodiversity Partnership are intending to do an updated “The State of Wildlife in Pembrokeshire” Report and it is hoped that this report will be prepared in time for the next Annual Monitoring Report.</p> <p>Overall the information available suggests that the trend for growth in the agricultural sector that has been experienced in the past may have been to the detriment of biodiversity. However, there is evidence²³ to suggest that within the National Park the condition of biodiversity features on agricultural land may be more favourable due to many long term management agreements with farmers/ landowners as well as the significant land holdings of the National Trust and Ministry of Defence.</p>
2	<p>Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.</p> <p>Progress towards this objective within the context of the Local Development Plan will be the result of maintaining or improving community facilities (Indicator 23 shows positive results here over the Plan period), and refusing planning applications for residential development in remote areas or areas with poor community infrastructure. Two proposals for residential development in a remote location were approved during this monitoring period contrary to Policy 7 of the Local Development Plan. As a result of this the issue of accessibility will be reviewed during the Local Development Plan review process, the Local Development Plan review will be subject to sustainability appraisal.</p> <p>An application for a second temporary permission of 3 years to use a former garage site in the centre of Tenby as a car park was also granted during this period. The Highway Authority had objected to the application on the basis that there was a lack of evidence to support the need for further car parking spaces in Tenby and that additional traffic would be encouraged into the town centre. This would be contrary to the traffic and parking management strategy to remove inappropriate parking and trips to and from Tenby, where traffic congestion is already an issue. Members considered issues of the permission being for an extension to the temporary period whilst the long term future of the site was considered by the landowner. Members also noted that the site offered easy access for people with disabilities (4 blue badge spaces were provided in the car park) and that this outweighed the Highway Authority and other policy objections and the car park was approved for 3 years.</p> <p>Achievement of this Sustainability Objective will depend largely on activity outside the Local Development Plan. Commentary for Sustainability Appraisal Objective 13 also indicates that generally, within the scope of the Local Development Plan, community facilities are being retained and enhanced.</p>

²³ [PCNPA Conservation Land Management Annual Monitoring Report 2014/15](#)

Objective Number	Sustainability Objective
3	<p>Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology) with reference to the special qualities of the National Park.</p> <p>Tranquillity mapping carried out by the Countryside Council for Wales in 1997 and 2009 suggests that the National Park is becoming a more disturbed place, largely due to increased impact of road traffic. There have been no updates to this data during this monitoring period for comparison.</p> <p>The adoption of the Landscape Character Assessment Study (July 2011) and Conservation Areas (October 2011) Supplementary Planning Guidance has helped to identify suitable enhancements as well as developments that would be out of character with the landscape or townscape of the National Park.</p> <p>In 2013 the Authority adopted new Supplementary Planning Guidance on Seascapes, which provides more detailed guidance on how Policies 8 (Special Qualities) and 15 (Conservation of Pembrokeshire Coast National Park) are applied. This new guidance helps to address seaward development impacts by dividing the National Park into 12 character areas and identifying their sensitivities.</p> <p>As part of the background work to the first review of the Local Development Plan a caravan capacity study has been commissioned that draws on the Landscape and Seascape Character assessments.</p> <p>In December 2013 Supplementary Planning Guidance on the Cumulative Impact of Wind Turbines was adopted, which aims to address the issue of multiple wind turbine proposals and associated landscape impacts. This should help to reduce the landscape impacts of wind turbine developments. However, no applications for wind turbines were received during this monitoring period.</p> <p>Partnership work with Pembrokeshire County Council and Carmarthenshire County Council has continued during this monitoring period to record renewable energy developments. This work has now resulted in comprehensive GIS data sets detailing the scale and location of wind turbine and large scale ground mounted photovoltaic developments. These datasets are available to the public for review and to officers and applicants to assist in assessing the cumulative landscape impacts.</p> <p>The Authority has put forward 10 sites throughout the National Park as candidates for “Dark Skies Discovery Sites”; these are small areas with good night sky quality and unobstructed views of the stars. The designation of these areas gives testament to the quality of the landscape in the National Park and should serve to further protect the landscape from unacceptable development in their designation. Appendix 1 also advises on the preparation of supplementary planning guidance on lighting (resources permitting).</p> <p>Long term concerns about changes in landscape quality are part of the rationale of this objective, application of the Local Development Plan and projects outside the planning process suggest positive progress towards this objective. Natural Resources Wales is currently updating the LANDMAP GIS resource. Updates to the Visual and Sensory Layer were finalised in March 2015. Whilst boundary changes have been proposed, with two new aspect areas identified in the Preseli range to improve accuracy and description of its outstanding landscape value, there were no recommended changes to downgrade classifications or evaluations for aspect areas within the National Park. This would indicate that in the long term (LANDMAP layers were first drafted before the Plan period) that the special qualities are being conserved.</p>
4	<p>Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.</p> <p>The role of the Local Development Plan in meeting this objective is likely to be restricted to its role in determining applications proposing development to support such activity, and securing planning obligations to develop cycle ways or footpaths. Policy 52 requires new development to include appropriate access for walkers and cyclists.</p> <p>No developments have received planning approval without providing appropriate access for cyclists and pedestrians during this monitoring period indicating that the Local Development Plan is contributing positively to this sustainability appraisal objective.</p>
5	<p>Increase the number of visitors using the National Park outside the peak visitor season.</p> <p>Progress in this Sustainability Appraisal Objective is largely dependent on activities beyond the</p>

Objective Number	Sustainability Objective
	<p>influence of the Local Development Plan i.e. an increase in visitor numbers out of season is more likely to come about as a result of the marketing strategies employed by the tourism sector or changes to the school holidays. However, the Local Development Plan may assist in increasing and improving visitor accommodation through planning approvals. The goals of the visitor economy policies (creating accommodation suited to year round use, whilst not adding substantively the overall provision) will help to do this.</p> <p>Approvals for self-catering accommodation since adoption of the plan help meet the aim to improve the suitability of accommodation for year round use, though they also increase the overall provision. Therefore the planning contribution to this Sustainability Objective can be seen as mixed. During this monitoring period 6 applications for the construction of or conversion of existing builds to self-catering units were approved. This is consistent with the objective of not adding substantively to overall provision.</p> <p>A review of the Authority's approach to camping, caravanning and chalet policies referred to in Chapter 2D will form part of the Local Development Plan review.</p>
6	<p>Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.</p> <p>The Local Development Plan will contribute towards this objective primarily by not adding to the amount of infrastructure at risk from fluvial/ coastal flooding. No planning permission to create new infrastructure in areas predicted to be effected by sea level rise of up to two metres were approved during this monitoring period (1st April 2014 – 31st March 2015).</p>
7	<p>Reduce factors contributing to climate change.</p> <p>Emissions of greenhouse gases resulting from activities within the National Park that could be influenced by the Local Development Plan are centred on domestic, commercial and road transport.</p> <p>Local authority estimates by the Department for Energy and Climate Change (DECC) for Pembrokeshire (2005 – 2012) (released 26/06/2014) indicate that the per capita rates of CO² for Domestic have remained consistent between 2005 and 2012.</p> <p>CO² from industrial and commercial sources were largely unchanged until 2011 with the 2012 estimate showing a significant reduction compared to any previous years (~170 tonne reduction).</p> <p>The CO² emissions per capita for transport have been gradually reducing year on year since 2007, this may be due to improvements in technology and fuel efficiency.</p> <p>Revised national planning policy, together with the new Building Regulations (Part L) should lead to energy efficiency improvements in all builds within the National Park. Local Development Plan Policy 29 will continue to provide a local policy on promoting sustainable design in all development (see Chapter 2 C). Local Development Plan.</p> <p>During this monitoring period two applications for a renewable energy schemes was submitted, a further reduction in the number of applications received during the previous monitoring period. One application was refused as it was found unacceptable in regard to Policy 7 of the Local Development Plan, which concerns development in areas outside of identified Local Development Plan centres.</p> <p>The target in the Local Development Plan for renewable energy generation is 4.91GWh. The current estimate is 3.58GWh (73% of target), if all permissions granted to date are implemented. Previously progress towards the Local Development Plan target was made more rapidly but this was facilitated by generous feed in tariffs from the government, these have now been reduced so a reduction in applications is to be expected. In addition the capacity of the landscape of the National Park to accommodate large renewable energy developments is limited.</p> <p>At present the Local Development Plan is falling short of its target for renewable heat generation (see commentary under indicator 12b) at only 3.2GWh of the 26GWh hoped to be achieved in the lifetime of the plan. This is due to a lack of planning applications for e.g. biomass boilers the popularity of which is influenced by grants, schemes and initiatives external to the planning process over which the Local Development Plan has limited influence.</p> <p>Please also see the commentary in Chapter 2C as the overall targets will require review to take account of an extended Local Development Plan period.</p>

Objective Number	Sustainability Objective
8	<p>Maximise the contribution of the limited opportunities for development to sustaining local communities.</p> <p>Provision of affordable housing within the National Park has fallen short of the target set out in the Local Development Plan (See the analysis and conclusions under indicator 22 for details). As an interim measure the National Park Authority has commissioned and completed updated affordable housing supplementary planning guidance that aims to streamline the planning process for affordable housing, the guidance has also re-examined the expectation of provision geographically and reduced it accordingly to better take into account recent economic conditions. These measures should help to improve affordable housing provision until the policy can be examined in detail at Local Development Plan Review stage.</p> <p>Indicators 21, 22 and 23 provides a detailed commentary on progress with the various allocations in the Local Development Plan and where areas require review. Permissions granted that are not on allocated sites can in general be regarded as positively contributing to sustaining local communities.</p> <p>In conclusion the Local Development Plan is contributing positively to the local economy throughout the Park by providing a positive policy framework for the approval of schemes.</p>
9	<p>Encourage access for all to the National Park, reflecting the social mix of society.</p> <p>Meeting this objective is likely to be the result of efforts outside the application of the Local Development Plan. Policy 39 may lead to the conversion of cheaper forms of accommodation to more expensive forms, which would not help in meeting this objective. During the monitoring period (April 1st 2014 and March 31st 2015) no application linked to this policy was approved or refused.</p> <p>Policy 45 encourages the delivery of affordable housing. Indicators 21 to 23 provides a commentary on progress made and actions being taken to improve performance.</p>
10	<p>Maintain the cultural distinctiveness of communities.</p> <p>This Sustainability Objective covers the breadth of aspects that contribute to the unique character and cultural distinctiveness of the National Park.</p> <p>Within the context of the Local Development Plan, achievements towards this objective will be twofold. Firstly the Local Development Plan will be able to contribute towards the objective by helping to ensure that people who grew up in the National Park are able to have the opportunity to continue living here once they are adults by sustaining local communities and enabling access to employment (see comments under SA Objective 8).</p> <p>Secondly, the Local Development Plan will be able to contribute to the objective by helping to maintain and enhance culturally significant built environment and natural environment features.</p> <p>In terms of maintaining listed buildings less than 10% (6.1%) are identified as being at any degree of risk. There seems to be significant potential for the uses of listed buildings to change – 5 listed building consents for change of use were granted between April 1st 2014 and March 31st 2015.</p>
11	<p>The adverse effects of minerals exploitation in the National Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.</p> <p>No new quarries or extensions to existing quarries have been approved during the monitoring period (April 1st 2014 and March 31st 2015).</p> <p>A Periodic Review application to review planning conditions for Carew Quarry was made to the Authority in December 2012 and is still on-going.</p> <p>The making of a Prohibition Order to prevent the resumption of mineral working at Penberry Quarry, with restoration conditions requiring demolition of the existing buildings on site, was approved by the Development Management Committee in January 2014. The Order has been publicised and submitted to the Welsh Government for confirmation.</p> <p>The Authority has recently received an application for the Review of Mineral Planning Conditions (ROMP) under the Environment Act 1995 at Syke Quarry and it is currently being determined.</p>
12	<p>Reduce the negative impacts of waste.</p> <p>The percentage of municipal waste collected for reuse, recycling or composting across</p>

Objective Number	Sustainability Objective
	<p>Pembrokeshire was 60.3% in 2013/14 (an increase of 7.4% on 2012/13), this figure is part of a consistent pattern of increasing levels of reuse, recycling and composting since 2008/09</p> <p>Incidents of recorded fly-tipping in Pembrokeshire decreased between 13% between 2006/7 and 2010/11. However, the period of 2011/12 has seen an increase in the incidence of fly tipping of 13.4% (a return to 2006/7 levels). Between 2012-13 and 2013-14 there has been a dramatic increase in the incidence of fly tipping from 710 in 2012-14 incidences to 1,163 in 2013-14.</p>
13	<p>Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population.</p> <p>The provision and retention of community facilities is affected, largely, by factors beyond the scope of the Local Development Plan. However the Local Development Plan can help to retain community facilities through the application of Policy 48. It can also contribute through granting planning applications for the construction of new facilities or the improvement of existing facilities.</p> <p>During the 2014 – 2015 monitoring period no applications were approved that would result in the loss of a community facility (contrary to Policy 48), and two applications were approved for the improvement of existing community facilities. Looking back since the date of the adoption of the Local Development Plan there have been various permissions for new or improved facilities – See Indicator 23 which demonstrates a positive policy framework.</p>
14	<p>Maintain and enhance biodiversity both within and outside designated sites</p> <p>The “State of Wildlife in Pembrokeshire” (2011) suggested that biodiversity associated with agriculture is in decline. More recent National studies support these suggestions (see comments under Objective 1), however, recent evidence at a local level suggests that work being carried out is helping to reverse this trend.</p> <p>During the 2014-15 monitoring period Pembrokeshire Coast National Park’s Direction and Delivery teams carried out conservation land management activities on 92 sites across the National Park, with one or two sites outside of the National Park where opportunities to improve connectivity arise. Results from this conservation monitoring period indicate that all of the sites under active conservation management are improving or are in excellent condition. Many of these sites help to maintain and enhance the biodiversity of designated sites by providing buffering and improving connectivity. This strategic approach has wide spread benefits for biodiversity both within and outside of the National Park.</p> <p>In addition there are specific projects carried out by the Conservation Team such as the Stitch in Time project, which is a strategic approach to the control of invasive non-native species in the Gwaun Valley.</p> <p>See the Conservation Land Management Report 2014-2015²² for more information.</p> <p>Within the scope of the Local Development Plan effects to biodiversity occur as the result of the loss of connectivity between habitats e.g. loss of hedgerows, or through the outright loss of habitats due to development pressure. All planning applications are tested for accordance with Local Development Plan Policy 11 ‘Protection of Biodiversity’. Between April 1st 2014 and March 31st 2015. No developments have received planning approval that were not compatible with this policy. Additionally, during the monitoring period, 50²⁴ planning applications have been approved that included measures to promote biodiversity gain</p> <p>It is considered that the Local Development Plan is making positive contributions to this Sustainability Objective.</p> <p>The adoption of the new British Standard for biodiversity should help to further future proof the Local Development Plan in the minimisation of the impacts of development to biodiversity.</p> <p>Appendix 1 also advises on the preparation of supplementary planning guidance on b (resources permitting).</p>
15	<p>Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.</p>

²⁴ This is due to improvements in the way that this is monitored and is not comparable with the previous monitoring figure but will be comparable with future figures.

Objective Number	Sustainability Objective
	<p>Dwr Cymru/Welsh Water (May 2014) has indicated that neither the provision of water resources or of sewerage should be considered to be a constraint to development, no specific concerns have been raised for existing development or new development within the Local Development Plan.</p> <p>During this monitoring period 11 beaches in the National Park were awarded blue flags, with a further 12 being awarded green coast awards (covering more remote, rural beaches).</p> <p>A Water Framework Directive Local Evidence package for Pembrokeshire Coast National Park prepared by Natural Resources Wales (April 2014) identified that 100% of the surface water bodies in the National Park were achieving 'Good' chemical status in 2013, whilst only 19% of surface water bodies were achieving 'Good' ecological status. The vast majority (78%) of surface water bodies achieved 'Moderate' ecological status and a further 3% were found to be in 'Poor' ecological status. These results represent a new method of assessing water bodies which supersedes the old General Water Quality Assessments, further data collated under this new methodology will be required to establish any new trends in water quality in the National Park.</p>

Appendix 1 Supplementary Planning Guidance

	Title	Current Status
1.	Accessibility	Adopted June 2013
2.	Affordable Housing (Replacement Guidance)	Adopted November 2014.
3.	Archaeology	Adopted June 2011
4.	Coal Works – Instability	Adopted June 2011- Technical update May 2014
5.	Conservation Area Proposals ²⁵	October 2011
6.	Landscape	Adopted June 2011
7.	Loss of Hotels	Adopted June 2011
8.	Low Impact Development	Adopted June 2013
9.	Parking	Adopted June 2011
10.	Planning Obligations	Adopted June 2011
11.	Recreation	Adopted December 2012
12.	Regionally Important Geodiversity Sites	Adopted October 2011
13.	Renewable Energy Addendum to the Renewable Energy on Field Arrays ²⁶	Adopted October 2011 Adopted June 2012 Technical update April 2014
14.	Safeguarding Mineral Zones	Adopted June 2011 Technical update June 2014
15.	Seascape Character	Adopted December 2013
16.	Shopfront Design	Adopted October 2011
17.	Siting and Design of Farm Buildings	Adopted June 2012
18.	Sustainable Design	Adopted June 2011 (updated December 2013)
19.	The Cumulative Impact of Wind Turbines	Adopted December 2013

²⁵ Angle, Caerfarchell, Caldey Island, Little Haven, Manorbier, Newport and Newport Parrog, Portclew, Porthgain, Saundersfoot, Solva, St David's Trefin, Tenby.

²⁶ Now incorporated in the Renewable Energy Supplementary Planning Guidance
Pembrokeshire Coast National Park Local Development Plan

	Title	Current Status
20.	Enabling Sustainable Development in Welsh National Parks	Adopted March 2015
21.	WITHDRAWN - Building Extensions	Adopted June 2011
22.	WITHDRAWN - Validation + Interim Statement (October 2011)	October 2009
23.	To do - Biodiversity Supplementary Planning Guidance	To do – dependant on resources.
24.	To do – Lighting Supplementary Planning Guidance	To do – dependant on resources.

Website link: [Pembrokeshire Coast National Park - SPG](#)

Appendix 2 Site Specific Monitoring

Key to Table 1

Planning permission granted/site completed	
Landowner or developer actively investigating bringing the site forward for development	
Allocation not progressing, e.g.: <ul style="list-style-type: none"> - Lack of interest by the land owner - Awaiting improvements to the housing market - Significant infrastructure constraint 	

Table 1 Allocations that include housing

	Location Proposals Map ID	Site Name and Location	Total number of Units ²⁷
1.	Broad Haven HA734	South of Driftwood Close	10
2.	Broad Haven MA776	Land north east of Marine Road	35
3.	Crymych HA750	Depot Site	18
4.	Dale HA382	Castle Way	12
5.	Dinas Cross HA387	Opposite Bay View Terrace	12
6.	Herbrandston HA732	East of Herbrandston Hall	12
7.	Jameston HA436	North of Landway Farm	6
8.	Jameston HA730	Opposite Bush Terrace	35
9.	Jameston HA821	Green Grove	5
10.	Lawrenny HA559	Adj Home Farm	30
11.	Manorbier Station HA848	Field opp Manorbier VC School	19
12.	Manorbier Station MA895	Land part of Buttylands	15
13.	New Hedges HA813	Rear of Cross Park	31
14.	Newport HA825	North of Feidr Eglwys	20
15.	Saundersfoot MA777	Rear of Cambrian Hotel, Saundersfoot	28
16.	Solva HA384	Adj Bro Dawel	18
17.	Solva HA792	Bank House, Whitchurch Lane	12
18.	St David's HA385	North of Twr-y-Felin	13
19.	St Davids HA737	West of Glasfryn Rd	90
20.	St David's HA789	Adj Ysgol Bro Dewi, Nun Street	10
21.	St Ishmaels MA733	Adj School	40
22.	Tenby HA377	Brynhir	168
23.	Tenby HA723	former cottage Hospital Site	10
24.	Tenby HA724	Rectory Car Park	50
25.	Tenby HA727	West of Narberth Road	25
26.	Tenby HA752	Butts Field Car park, Tenby	80

²⁷Reflects number of units granted planning permission as at April 2015
Pembrokeshire Coast National Park Local Development Plan

	Location Proposals Map ID	Site Name and Location	Total number of Units ²⁷
27.	Tenby HA760	Reservoir Site, Tenby	12
28.	Tenby MA706	Upper Park Road, Tenby	14
29.	Tenby MA707	White Lion St/Deer Park, Tenby	48
30.	Tenby MA710	Sergeants Lane, Tenby	5
31.	Trefin HA738	North of Heol Crwys	15
	Total		898

Key to Tables 2,3 and 4

Planning permission granted/site completed	
Landowner or developer actively investigating bringing the site forward for development	
Allocation not progressing	

Table 2 Allocations of Employment/Mixed Use Sites (not included in Table 1)

Location/ Proposals Map ID	Site Name	Proposed Use	Monitoring
Newport MA232	Land adjacent to the Business Park, Feidr Pen y Bont	Mixed (Live/Work Units)	Not implemented. Planning permission granted in May 2009 for a new factory unit on proportion of this land has now lapsed. Landowner has no short-term proposals for the site.
St David's EA748	South of St Davids Assemblies	Employment B1, B8, Local Waste Management Facility	Not implemented. Landowner has advised that this site will not be developed. This will be addressed the through Local Development Plan Review.
St David's MA746	Between Glasfryn Road and Millard Park, St Davids	Mixed (Live/Work Units)	Not implemented.

Table 3 Community Facilities

Site Ref	Site Name & Location	Use	Monitoring
CP829	Land at Saundersfoot Railway Station, Pentlepoir	Car park	Some pre application discussions have taken place. No further update for the 2015 Annual Monitoring Report.
CP828	Manorbier Station	Car park	Application NP/13/82 granted for 5 parking spaces; 1 disabled space, cycle parking and directional signs. This

			has been implemented.
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Table 4 Road & Cycle Schemes

Scheme Number	Road/Cycle Schemes	Monitoring
RI1	New House Bridge Improvement A4075	A major realignment is now unlikely. Work will be focussed on the provision of a shared use path from Bluestone Roundabout the Eagle Lodge and some localised visibility improvements. Could be developed in phases with S106 funding from Bluestone.
RI2	Shared Use Path south of Carew Castle	Work is completed.
RI3	St Petrox Bends Improvement	A scaled back and localised version of the original aspiration is now being considered by Pembrokeshire County Council.
RI4	Fan Road/B4316 Junction Improvement, Saundersfoot	Not implemented. No progress to date.
RI5	Gumfreston to Tenby Phase 3	Automatic flood warning signs being designed. Work should be complete in 2015/16.
RI6	Glasfryn Lane, St Davids	Local Transport Funding from the Welsh Government was secured in 2015 to complete land acquisition, accommodation works and prepare tender documentation. The main works are to be undertaken in 2016/17 (subject to the successful outcome of future LTF bid submission).
RI7	A40 Canaston Bridge	Scheme completed and road opened on 16 th March 2011.