

**REPORT OF THE DIRECTOR OF PLANNING AND PARK DIRECTION**

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**SUBJECT: PCNPA PLANNING ANNUAL PERFORMANCE REPORT 2018-19**

**Purpose of Report**

1. The Planning Annual Performance Report (APR) is a document which is produced by the Authority for submission to the Welsh Government by 31<sup>st</sup> October each year. It looks back at the previous financial year, from 1 April to the 31 March.
2. APRs have been introduced as part of Welsh Government's proposals, embodied with the Planning (Wales) Act 2015, to modernise the planning system and improve local delivery of planning services.
3. Planning Authorities are required to prepare an annual report, identifying how the planning authority has performed against set indicators, noting what it has done well so that this can be shared with others, and what steps might be taken to address areas of performance in need of improvement.
4. The Planning Annual Performance Report (APR) for 2018-19 is attached.
5. The results of the survey carried out with City, Town and Community Councils are included within the report. This survey is aimed at assessing the views of the City, Town and Community Councils and how they engage with the Local Planning Authority.

**Risk considerations**

6. This is a statutory requirement. Welsh LPAs are required to publish an annual report, setting out their performance against service standards set out in the Welsh Government's Planning Performance Framework. The Welsh Government publishes annually a report summarising the findings of local planning authority Annual Performance Reports.

**Financial considerations**

7. Customer survey and benchmarking work comes as part of our subscription to Planning Officers Society Wales.

**Equality considerations**

8. The Public Equality Duty requires the Authority to have due regard to the need to eliminate discrimination, promote equality of opportunity and foster good

relations between different communities. This means that, in the formative stages of our policies, procedure, practice or guidelines, the Authority needs to take into account what impact its decisions will have on people who are protected under the Equality Act 2010 (people who share a protected characteristic of age, sex, race, disability, sexual orientation, gender reassignment, pregnancy and maternity, and religion or belief). This is a monitoring report and does not contain policy, procedure, practice or guidelines.

### **Welsh Language considerations**

9. The document will be published in Welsh and English on the Authority's website.

### **Human Rights considerations**

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

### **Recommendation**

**That the attached Pembrokeshire Coast National Park Authority Local Development Plan (APR) 2018/19 be approved for submission to the Welsh Government.**

# Pembrokeshire Coast National Park LPA

## PLANNING ANNUAL PERFORMANCE REPORT (APR) – 2018-19

### PREFACE

*I have the pleasure of introducing the fifth Planning Annual Performance Report (APR) for the Pembrokeshire Coast National Park Authority (PCNPA).*

*APRs have been introduced as part of Welsh Government's proposals, embodied with the Planning (Wales) Act 2015, to modernise the planning system and improve local delivery of planning services. I hope that this document succinctly tells the story of how we are performing our planning function. We were pleased that during 2018/19 we were able to provide the public with the facility to view planning applications online.*

*National Parks are special places and we are charged with the task of ensuring that this precious landscape is held for future generations. We are conscious that we are endeavouring through our planning function to maintain a healthy balance as required under the Wellbeing of Future Generations Act.*

Chair of Pembrokeshire Coast National Park Authority

### CONTEXT

- 1. This section sets out the planning context within which the local planning authority operates.**
- 1.1. The Pembrokeshire Coast National Park Authority is charged with delivering the planning services within the Pembrokeshire Coast National Park. The National Park runs in a ribbon around the Pembrokeshire Coast and includes the lower sections of the Cleddau rivers, it also includes the Preseli hills and Gwaun valley. It is the only UK National Park designated primarily for its coastline, and the Pembrokeshire islands are included within it.
- 1.2. The National Park covers an area of 614km<sup>2</sup> and is one of the more densely populated of the UK's National Parks, with almost 22,000 people living in 49 Community, Town and City Council areas (2010 census figures). Most of the National Park is privately owned; however about a quarter lies in the public realm or in charitable ownership.
- 1.3. The National Park itself was designated in 1952, with the following purposes:
  - to conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park; and

- to promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.

## **2. Planning background, including previous adopted or abandoned development plans.**

1.4. The Pembrokeshire Coast National Park Authority Local Development Plan (LDP) was adopted in 2010 and covers the period between 2010 and 2021. This plan replaced the Joint Unitary Development Plan for Pembrokeshire (2000-2016). The Authority has produced a range of Supplementary Planning Guidance ('SPG') which supports and provides guidance to the implementation of policies contained within the LDP. The Authority has reviewed its LDP and is currently in the examination stage, it is anticipated that LDP2 will be formally adopted during reporting year 2019/20.

## **3. Place and fit within the community strategy and/or wider strategic and operational activity of the authority.**

3.1. The Authority has a National Park Management Plan (2015-2019) which sets out a coordinated approach in managing the purposes of the National Park. The Plan gives people a clear line of sight between National Park purposes and management policies in which the NPA explains what the National Park is, how it is managed, and why it is proposed to manage it in one way rather than another. It is for partner organisations, residents, auditors and anyone with a more detailed interest in the National Park and the NPAs role in its management. The Authority is currently consulting on a draft Management Plan covering the period 2020-2024, it is anticipated that this will be formally adopted in reporting period 2019/20.

## **4. Existing and previous major influences on land use (e.g. heavy industrial, agricultural, energy, transport).**

4.1. Pembrokeshire Coast National Park is known for its outstanding landscapes, the influences on these, currently and in the future will be the agricultural practices which have shaped and will heavily influence the quality of the landscape. The refining industries around the Haven will also impact on this. The major other land users are defence ranges and tourism.

## **5. Historic/landscape setting of the area, including AONBs, conservation areas etc.**

5.1. The Pembrokeshire Coast National Park has 285 Scheduled Ancient Monuments, and over 7,500 sites in the Historic Environment Record. There are over 1200 listed buildings and 13 designated Conservation Areas. Nine Historic Landscape areas are wholly or partly within the National Park, and there are 15 Historic Parks & Gardens in the National Park. Tenby Conservation area is proposed to be significantly extended and the Authority is preparing a new Supplementary Planning Guidance to reflect this.

## **6. Urban/Rural Mix and Major Settlements**

6.1. The National Park is predominantly rural with four larger Centres, Tenby, St Davids, Saundersfoot and Newport. An estimated third of all households in the National Park are living in the countryside which are scattered through smaller villages, hamlets, sporadic

dwellings and farms.

6.2. .

6.3. The key urban areas within the National Park include Tenby (Tier 2 Centre) and Newport, Saundersfoot and St Davids (Tier 3 Centres). There are 19 Rural Centres (Tier 4) throughout the National Park including Amroth, Angle, Boshaston, Broad Haven, Dale, Dinas Cross, Felindre Farchog, Herbrandston, Jameston, Lawrenny, Little Haven, Manorbier, Manorbier Station, Marloes, Newgale, Pontfaen, Solva, St Ishmaels and Trefin. There are an additional 10 Rural Centres which are positioned partly within the National Park.

6.4. The total number of households identified in the 2011 Census in the National Park is 13,700.

## **7. Population change and influence on LDP/forthcoming revisions.**

7.1. Recently published Welsh Government population figures show a decline in population for this National Park.

7.2. For Local Development Plan, population projection figures have been taken account of in considering the housing provision needed for the life of the replacement Plan (2031). The focus of the Plan is on the delivering affordable housing through cross subsidy from market housing development. .

## PLANNING SERVICE

- 8.1. The Authority is organised into two key service areas one of which include Park Direction/Planning, which comes within the remit of the Director of Planning and Park Direction.
- 8.2. The Planning Policy function of the National Park is under the direction of the Head of Park Direction. The post holder is also responsible for the National Park Management Plan, Biodiversity, Archaeology, Coast path and footpaths, health and wellbeing, environmental matters and statistical and data information.  
The Development Management (DM) and Enforcement functions are under the direction of the Team Leader: Development Management, the post holder is also responsible for the conservation of historic buildings, planning ecology, trees and landscape matters.
- 8.3. The out turn for development management in 2018/19 was £455,846 with the budget for 2019/20 set at £465,899 a reduction of 30% over 6 years with a reduction in staffing levels of 2 fte in that period.. The 30% reduction relates to the budget figure of £687,000 in 2013/14 and £in 2019/20. Planning policy and other Direction functions is at about £190,000 each year.
- 8.4 The Planning function has had a year with some vacancies which have had a knock on effect. Working collaborately with other Local Planning Authorities one DM officer was seconded to Carmarthenshire County Council for a period of 5 months, which assisted Carmarthen with their workload and more importantly provided the officer with valuable experience. The PCNPA continues to use the very flexible arrangement of using consultants to reduce pressure points. There are service level agreements to cover minerals planning with Carmarthenshire County Council (CCC), and one which covers planning ecology work with Pembrokeshire County Council (PCC).
- 8.4. Looking to the future the PCNPA is keen to plan for planning expertise and capacity to continue to deliver a good planning service. To this end it continues to put a high priority on training of staff at all levels in the planning department. With limited take up of vacant positions, PCNPA is seeking to grow its own planners and enforcement officers offering on the job training to candidates from other disciplines who have been able to demonstrate life skills and attitudes which we would seek to find in the planning professions.
- 8.5. PCNPA has a commitment to ensure staff are trained for their roles and therefore all planning officers are Royal Town Planning Institute (RTPI) members and subscriptions to this professional body are paid for by the Authority. Enforcement in the Authority is given a high profile and therefore all enforcement officers are members of National Association of Planning Enforcement (NAPE) and subscriptions to this professional body are paid for by the Authority. Planning staff play an active role in sharing good practise with other organisations and they are actively put forward to attend meetings and seminars to widen their own experiences too.

- 8.6. The Authority expects its planners and enforcement officers to complete and comply with the RTPI's/NAPE's continuing professional development (CPD) requirements and these are assessed through its own staff annual performance appraisals.
- 8.7. A local and relevant planning training programme is delivered in house and planners (and others including members) are invited to attend these sessions. The training offered to staff and Members covers a huge diversity of topics which are considered appropriate for planners to be involved in, especially given the National Park status.
- 8.9 PCNPA together with Pembrokeshire County Council has continued to deliver an Agents' Forum. The forum meets quarterly and is intended not only to inform agents of planning related information which is relevant to their work in Pembrokeshire, but also offers the opportunity for agents to put forward their views on how both local planning authorities are working to take their needs into account. These events are well attended by local planning agents
- 8.10 Collaboration is an important part of PCNPA's culture – and this is probably largely due to the small size of the organisation. Joint working allows us to share good practice, and also makes the Authority more resilient.
- 8.11 We have a good working relationship with our neighbouring authorities, Ceredigion, Carmarthenshire and particularly Pembrokeshire. We use the resources of PCC for monitoring of section 106 arrangements and also use its legal team with regard to the drafting and use of templates for planning legal agreements. We also buy in to its planning ecology service – ensuring a consistency of approach throughout the whole of Pembrokeshire with regard to biodiversity which takes no notice of administrative boundaries. Both Authorities – Pembrokeshire CC and PCNPA have a delegation from Cadw to deal with most listed building applications – the agreement allows for the professional officers to work across the boundaries – again to assist with consistency and resilience.
- 8.12 We have implemented an effective document management system, allowing access to planning applications on our Website and promote a customer friendly approach to our planning surgery and pre-application service. We will continue to collaborate with the Planning Departments at Brecon Beacons National Park Authority and Snowdonia National Park Authority and make contributions to POSW (Planning Officers Society Wales) sharing best practice work.

## THE AUTHORITY'S STORY

- 9.1. The Authority has reviewed its LDP and is currently in the examination stage, it is anticipated that LDP2 will be formally adopted during reporting year 2019/20.
- 9.2. The 2017-18 Local Development Plan Annual Monitoring Report is available and a copy of the report is published on the Authority's website. The 2018-19 Monitoring Report will be available by the 31<sup>st</sup> October 2018.
- 9.3. The Local Development Plan identifies 17 key outcomes by the end of the Plan period (i.e. 2021) and 36 indicators in the Monitoring Report are grouped beneath these outcomes to test the performance of the Plan (2018 report).
- 9.4. In summary the majority of the Plan's targets and objectives are being met. There are issues with 7. The key issues relate to effectively available housing land supply; employment land being brought forward and affordable housing delivery.
- 9.5. The planning application process is becoming increasingly complex and the duty officer approach whereby potential applicants can book a half hour slot with a planner to go through the planning process and what information is required to be submitted with their application is again popular this year. There is currently no charge for this service.
- 9.6. Current projects
- Examination of the Deposit Local Development Plan
  - Embedding of Document Management System
  - Digitising historic files
- 9.7. Local pressures
- Major agricultural applications and unauthorised agricultural buildings
  - Monitoring caravan and campsites and '28' day rule sites
  - Increase in unauthorised holiday accommodation through Airbnb
- 9.8. Service improvement

Working towards the corporate well-being objectives of:

PCNPA Well-being Objectives	Contribution to Well-being Goals
1. To encourage and support the development of sustainable employment and businesses, particularly in tourism & recreation.	Contributes to a 'Prosperous Wales' and a 'Resilient Wales' by encouraging the development of new and existing businesses and increasing the number of jobs while discouraging unsustainable use of the natural resources. Increased employment should support 'More Equal Wales' and also to a 'Healthier Wales'



2. To improve the health of the National Park's ecosystems,	Using ecosystems management is a key technique in preparing the Well-being Assessment for the PSB in ensuring a 'Resilient Wales' and in preparing any future National Park Management Plan and Local Development Plan.
3. To enable and encourage more people to improve their well-being by making a greater use of the National Park regardless of their circumstances	Activity in the outdoors, such as walking, can improve the feeling of well-being, reduce stress and be inspirational By promoting more regular use of the outdoors whether it is on people's doorstep or within the National Park, encouraging volunteers and removing barriers to access this objective contributes to both a 'Healthier Wales' and a 'More Equal Wales'
4. To continue to ensure equality is embedded within the work and culture of the NPA	The Authority encourages the less able to become engaged and involved and promotes equality and diversity in both its staff and Members and through training opportunities.
5. To Work alongside communities to help them make the most of the NPA	Already many communities and local groups are engaged with and contribute to the work of the National Park Authority from consultation responses to local environmental improvement projects. By increasing the scale and scope of this, taking a co-production approach and developing our work to engage new audiences that are representative of society will add to a 'Wales of cohesive communities'
6. To protect and promote the local culture of language, arts and heritage of the area	Pembrokeshire has a rich culture in the arts, heritage and language. This is recognised as part of the area's distinctiveness contributing to a 'Wales of vibrant culture and thriving Welsh language'.
7. To ensure our work makes a positive contribution to global well-being.	By continually reducing our carbon footprint, supporting the green growth agenda through SDF projects and educating people about the special purposes of the Park the Authority contributes to a 'Globally Responsible Wales'. The Well-Being Objectives support a globally responsible Wales by protecting the natural and historic environment, our support for the local economy and through our education provision..

9.9. Planning performance measures are included within the Corporate Plan and reported to Members via Operational Review Committee and Audit and Corporate Services Committee during the year.

9.10. The planning teams in both DM and Planning Policy are focused on service delivery, efficiency and public perception as drivers for their work programming. Within Development Management the key targets were:

- |   |
|---|
| 1. Improve speed of determining applications to an average of 66 days |
| 2. Review pre-application processes and planning surgery processes    |

3. Set up a formal system for monitoring enforcement cases
4. Update Conservation Area SPGs
5. Continue with focussed enforcement projects
6. Continue work to improve public perception of the planning service through greater community and town/community council engagement

9.11. The performance figures for PCNPA speak for themselves in the tables at the end of this document. The Document Management System was implemented in March 2019 and applications were available on line from this date.

9.12. **Housing Land Supply:** The Authority is required to demonstrate a five year effectively available housing land supply.

9.13. 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 sites allocated in the Local Development Plan has shown a marked increase in recent years 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 revision.

9.14. A Joint Housing Land Availability Study was finalised in July 2018 and showed a 1.4 year land supply. The Plan will end part-way through the Joint Housing Land Availability Study period (2021 Plan end date) and so the method of calculation takes this into account (as set out in Table 4 of Technical Advice Note 1). The report uses the residual method to calculate the land supply.

9.15. 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.
- 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.
- d) The Authority is reviewing site allocations through the Local Development Plan revision to address the shortfall in effectively available land.

9.16. For Local Development Plan revision this has meant revisiting the overall housing land requirements and consequently the Plan's housing provision and acknowledging uncertainties in the housing market in setting annual targets.

## WHAT SERVICE USERS THINK

In 2017-18 we conducted a customer satisfaction survey aimed at assessing the views of people (agents and members of the public) that had received a planning application decision during the year.

The survey was sent to 186 people, 17% of whom submitted a whole or partial response. The majority of responses (56%) were from members of the public. 0% of respondents had their most recent planning application refused.

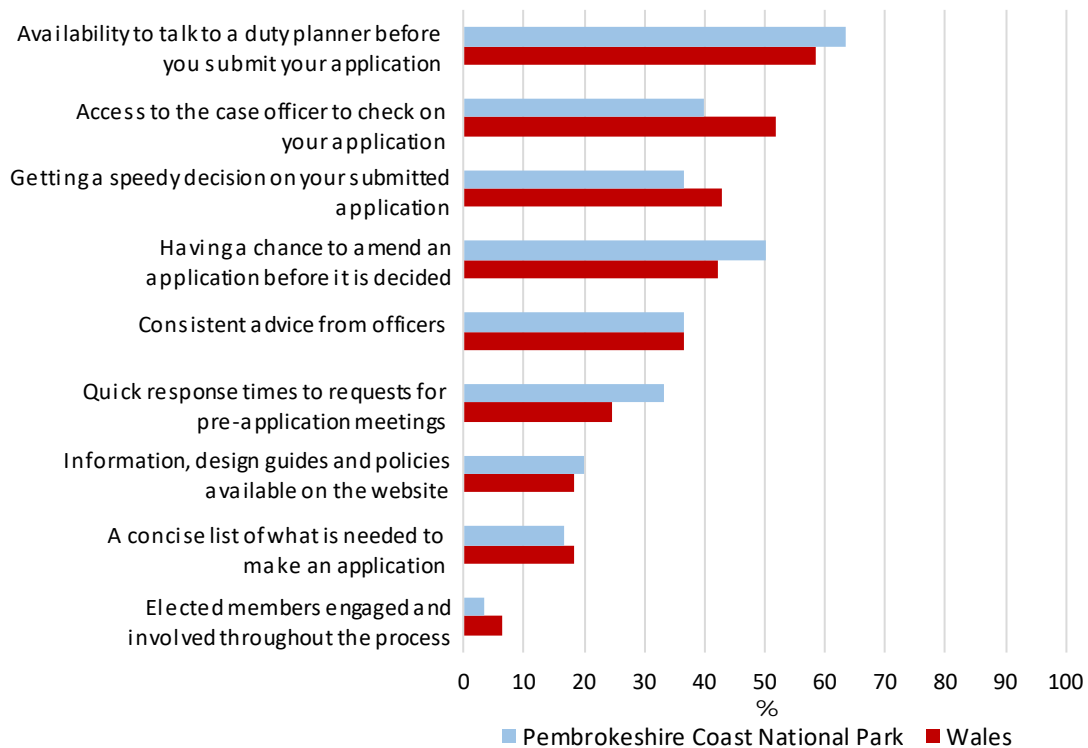
We asked respondents whether they agreed or disagreed with a series of statements about the planning service. Table 1 shows the percentage of respondents that selected either 'tend to agree' or 'strongly agree' for each statement for both our planning authority and Wales.

**Table 1: Percentage of respondents who agreed with each statement, 2017-18**

Respondents who agreed that:	Pembrokeshire Coast National Park LPA %	Wales %
The LPA applies its planning rules fairly and consistently	47	55
The LPA gave good advice to help them make a successful application	67	60
The LPA gives help throughout, including with conditions	61	52
The LPA responded promptly when they had questions	63	62
They were listened to about their application	71	60
They were kept informed about their application	48	52
They were satisfied overall with how the LPA handled their application	72	63

We also asked respondents to select three planning service characteristics from a list that they thought would most help them achieve successful developments. Figure 1 shows the percentage of respondents that chose each characteristic as one of their three selections. For us, 'the availability to talk to a duty planner before submitting an application' was the most popular choice.

**Figure 1: Characteristics of a good planning service, 2017-18**



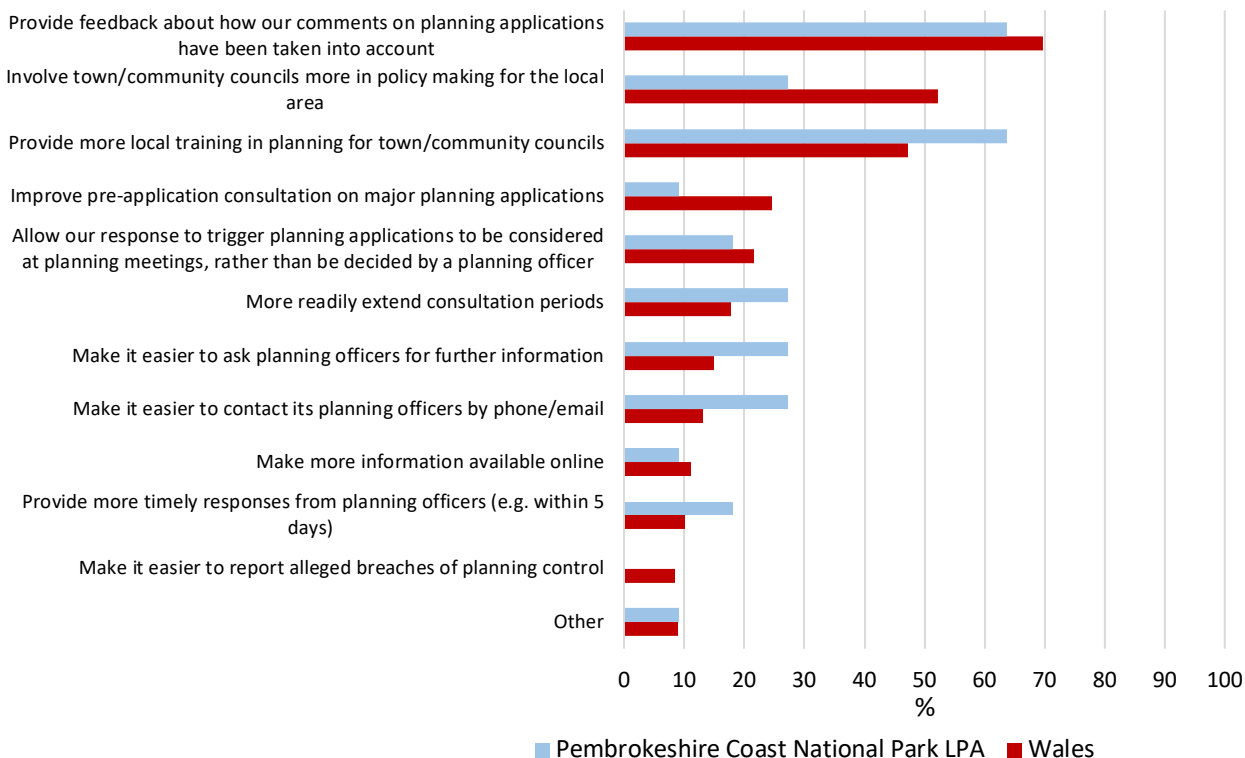
Comments received include:

- “Its a pleasure to work with the team of planning officers at PCNPA.”
- “It is a good service”.
- "It would be better if they had more staff in development control they all seem to be run off their feet”.

In 2018-19 we conducted a survey of clerks of the town and community councils that are statutory consultees for our planning authority. There are 49 such councils in our area, and we received 11 responses to the survey.

The respondents were asked to select the three ways in which they thought our LPA could help town/community councils to participate more effectively in the planning system. Figure 2 shows the percentage of respondents that selected each option as one of their three choices. ‘Provide feedback about how our comments on planning applications have been taken into account’ and ‘Provide local training in planning for town/community councils’ were the most frequently selected option for our LPA.

**Figure 2: Ways LPAs could help town/community councils participate more effectively in the planning system, 2018-19**



**OUR PERFORMANCE 2018-19**

This section details our performance in 2018-19. It considers both the Planning Performance Framework indicators and other available data to help paint a comprehensive picture of performance. Where appropriate we make comparisons between our performance and the all Wales picture.

Performance is analysed across the five key aspects of planning service delivery as set out in the Planning Performance Framework:

- Plan making;
- Efficiency;
- Quality;
- Engagement; and
- Enforcement.

**Plan making**

As at 31 March 2019, we were one of 23 LPAs that had a current local development plan (LDP) in place. We are required to submit an Annual Monitoring Report in October 2019. This document has been prepared.

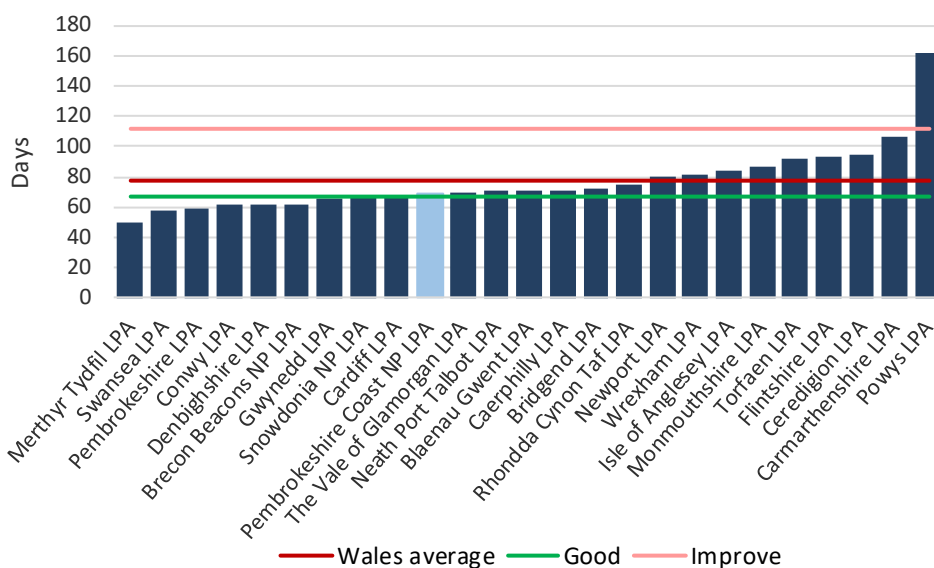
During the APR period we had 1.4 years of housing land supply identified, making us one of 19 Welsh LPAs without the required 5 years supply.

9 respondents to the 2018-19 town and community council clerks survey (82%) said that their council contributed to the production and/or review of our LDP. Of these, 56% agreed that the LDP process is easy to understand, and 78% agreed that their council is satisfied with how the LDP process is going (or went), compared to 64% and 62% respectively across Wales.

## Efficiency

In 2018-19 we determined 500 planning applications, each taking, on average, 69 days (10 weeks) to determine. This compares to an average of 77 days (11 weeks) across Wales. Figure 3 shows the average time taken by each LPA to determine an application during the year.

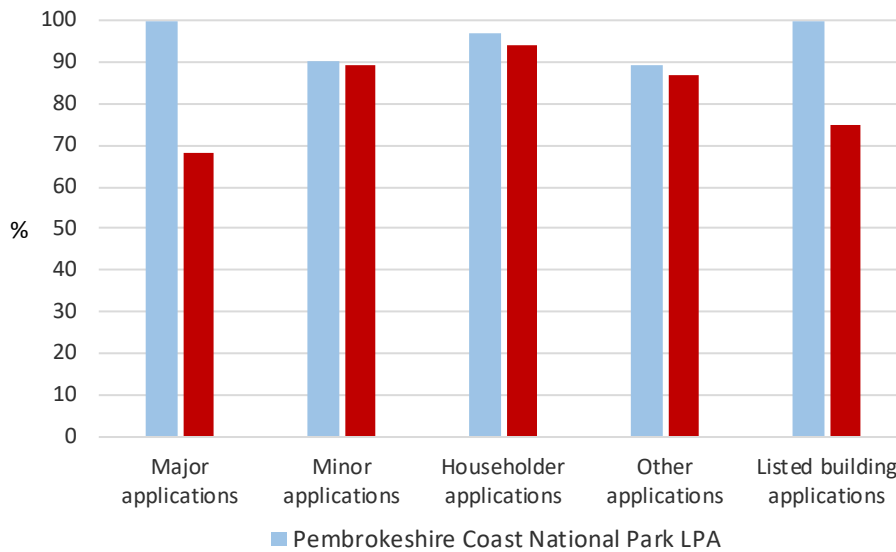
**Figure 3: Average time taken (days) to determine applications, 2018-19**



90% of all planning applications were determined within the required timescales. This compared to 88% across Wales and we were one of 20 LPAs that had reached the 80% target.

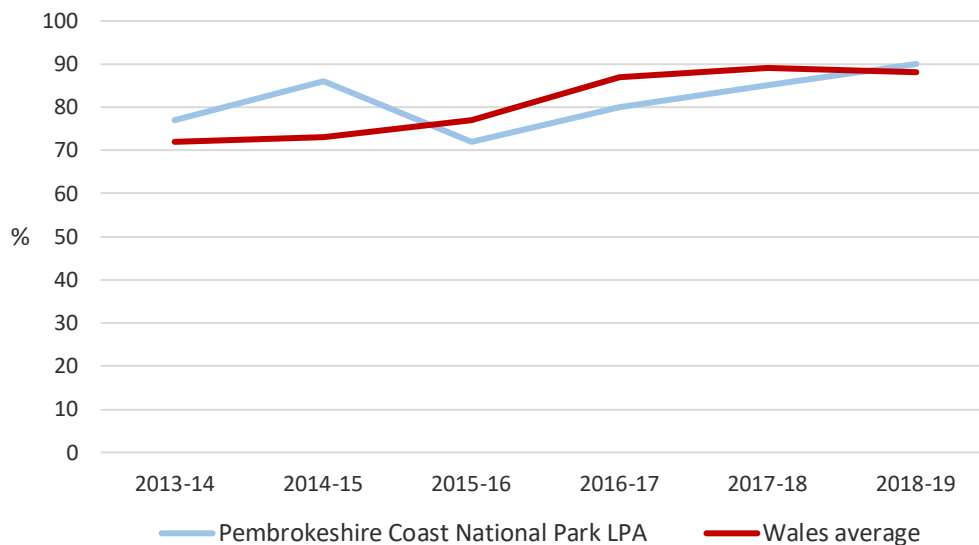
Figure 4 shows the percentage of planning applications determined within the required timescales across the main types of application for our LPA and Wales. It shows that we determined 97% of householder applications within the required timescales. We also determined 100% of Listed Building Consent applications within the required timescales.

**Figure 4: Percentage of planning applications determined within the required timescales, by type, 2018-19**



Between 2017-18 and 2018-19, as Figure 5 shows, the percentage of planning applications we determined within the required timescales increased from 85%.

**Figure 5: Percentage of planning applications determined within the required timescales**



Over the same period:

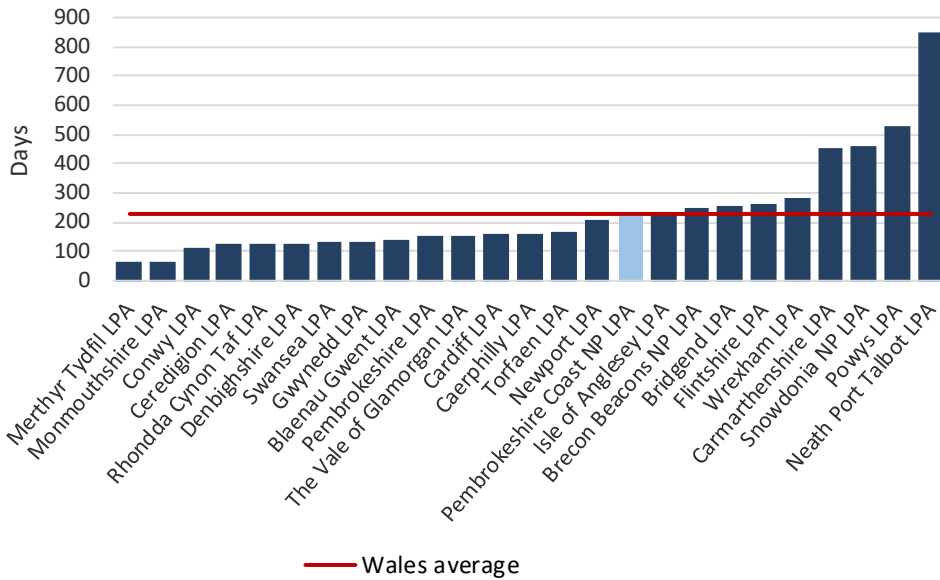
- The number of applications we received decreased;
- The number of applications we determined decreased; and
- The number of applications we approved decreased.



## Major applications

We determined 9 major planning applications in 2018-19, none of which were subject to an EIA. Each application took, on average, 224 days (32 weeks) to determine. As Figure 6 shows, this was shorter than the Wales average of 232 days (33 weeks).

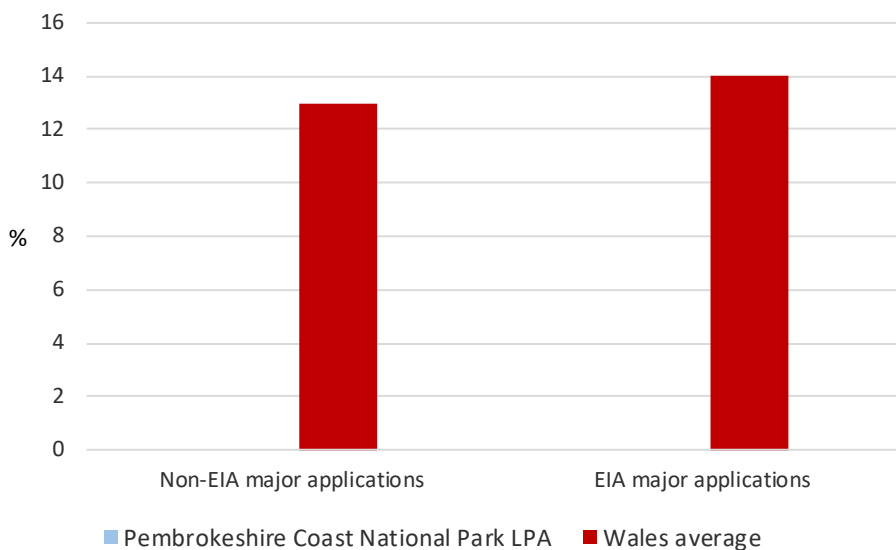
**Figure 6: Average time (days) taken to determine a major application, 2018-19**



100% of these major applications were determined within the required timescales, compared to 69% across Wales.

Figure 7 shows the percentage of major applications determined within the required timescales by the type of major application. 0% of our 'standard' major applications i.e. those not requiring an EIA, were determined within the required timescales during the year.

**Figure 7: Percentage of major applications determined within the required timescales during the year, by type, 2018-19**

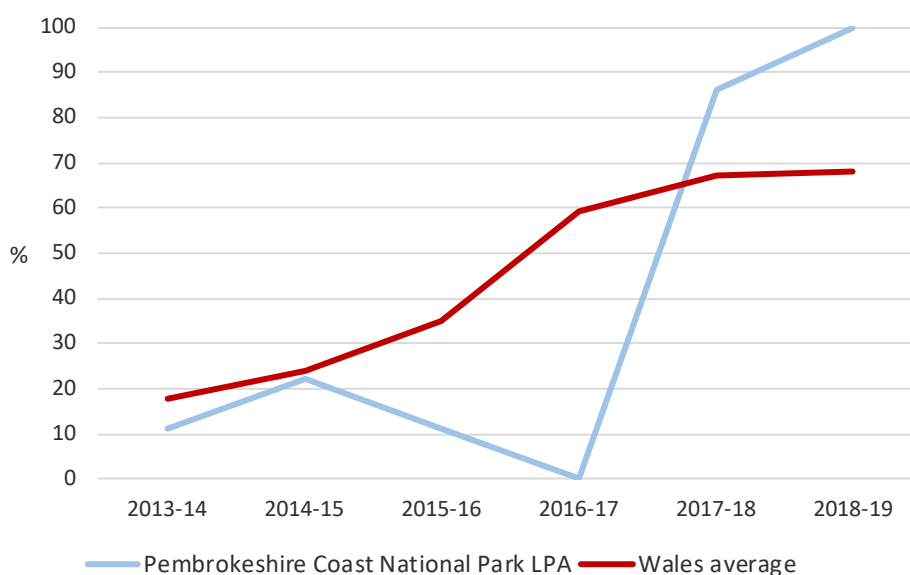


In addition we determined 9 major applications that were subject to a PPA in the required timescales during the year.

Since 2017-18 the percentage of major applications determined within the required timescales had increased from 86%. Similarly, the number of major applications determined increased while the number of applications subject to an EIA determined during the year stayed the same.

Figure 8 shows the trend in the percentage of major planning applications determined within the required timescales in recent years and how this compares to Wales.

**Figure 8: Percentage of major planning applications determined within the required timescales**



Over the same period:

- The percentage of minor applications determined within the required timescales increased from 87% to 90%;
- The percentage of householder applications determined within the required timescales increased from 92% to 97%; and
- The percentage of other applications determined within required timescales increased from 79% to 89%.

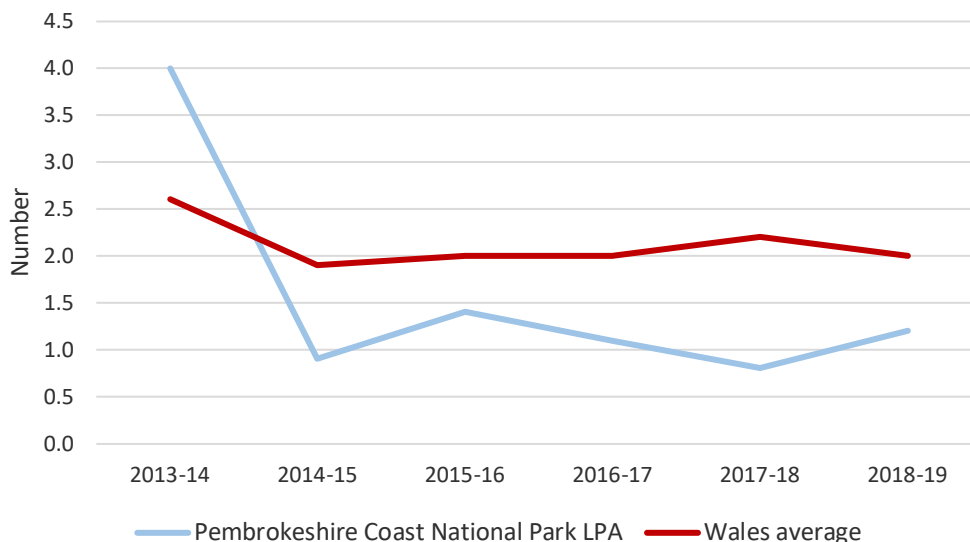
## Quality

In 2018-19, our Development Management Committee made 26 planning application decisions during the year, which equated to 5% of all planning applications determined. Across Wales 6% of all planning application decisions were made by planning committee.

4% of these member-made decisions went against officer advice. This compared to 9% of member-made decisions across Wales. This equated to 0.2% of all planning application decisions going against officer advice; 0.5% across Wales.

In 2018-19 we received 7 appeals against our planning decisions, which equated to 1.2 appeals for every 100 applications received. Across Wales 2 appeals were received for every 100 applications. Figure 9 shows how the volume of appeals received has changed since 2017-18 and how this compares to Wales.

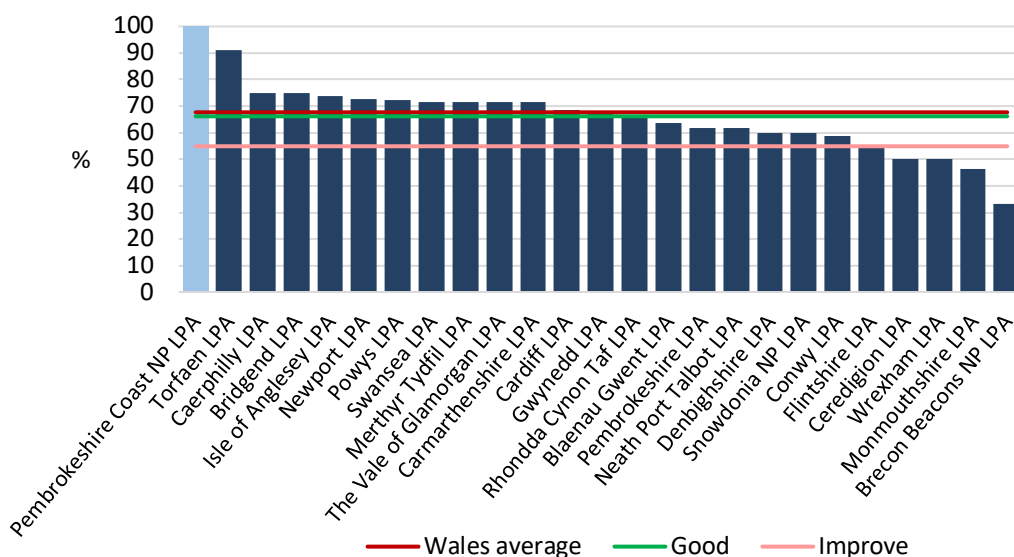
**Figure 9: Number of appeals received per 100 planning applications**



Over the same period the percentage of planning applications approved decreased from 85% to 79%.

Of the 6 appeals that were decided during the year, 100% were dismissed. As Figure 10 shows, this was the highest percentage of appeals dismissed in Wales and we were one of 14 LPAs that reached the 66% target.

**Figure 10: Percentage of appeals dismissed, 2018-19**



During 2018-19 we had no applications for costs at a section 78 appeal upheld.

10 respondents (91%) to the 2018-19 town and community council clerks survey reported that they were either ‘very satisfied’ or ‘somewhat satisfied’ with how the Planning Inspectorate deals with their council around appeals, compared to 55% of the respondents across Wales.

## Engagement

We are:

- one of 24 LPAs that allowed members of the public to address the Planning Committee;
- one of 22 LPAs that had an officer on duty to provide advice to members of the public; and
- one of 2 LPAs that had a partial online register of planning applications.

8 (73%) of the town and community council clerks that responded to the 2018-19 survey felt that their council has enough time and resources to effectively contribute to development management in our area, compared to 59% of clerks that responded across Wales. 2 (18%) reported that they are ‘always’ able and 9 (82%) reported that they are ‘sometimes’ able to respond to applications within the 21 day statutory time period.

As Table 2 shows, 67% of respondents to our 2017-18 customer survey agreed that the LPA gave good advice to help them make a successful application.

**Table 2: Feedback from our 2017-18 customer survey**

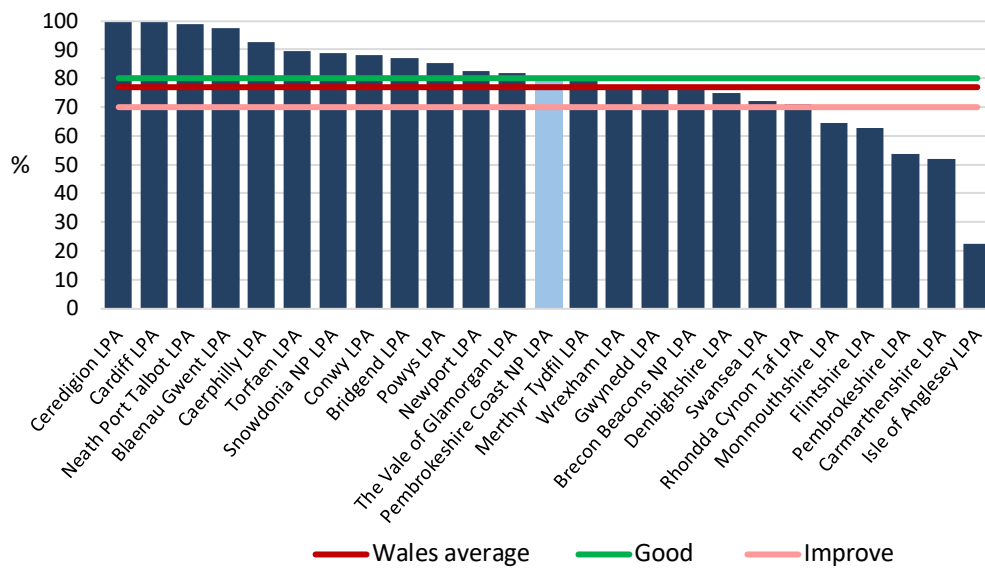
Respondents who agreed that:	Pembrokeshire Coast	Wales %
	National Park LPA %	
The LPA gave good advice to help them make a successful application	67	60
They were listened to about their application	71	60

## Enforcement

In 2018-19 we investigated 256 enforcement cases, which equated to 11.4 per 1,000 population. This was the highest rate in Wales.

We investigated 80% of these enforcement cases within 84 days. Across Wales 77% were investigated within 84 days. Figure 11 shows the percentage of enforcement cases that were investigated within 84 days across all Welsh LPAs.

**Figure 11: Percentage of enforcement cases investigated within 84 days, 2018-19**



The average time taken to pursue positive enforcement action was 332 days.

In the 2018-19 town and community council clerks survey, 5 respondents (45%) stated that our LPA investigates enforcement cases ‘very promptly’ or ‘reasonably promptly’, compared to 36% of respondents across Wales. 7 respondents (64%) reported that they are either ‘very satisfied’ or ‘somewhat satisfied’ with how our LPA generally responds to investigating breaches. This was 40% for Wales.

ANNEX A - PERFORMANCE FRAMEWORK

OVERVIEW

MEASURE	GOOD	FAIR	IMPROVE
<b>Plan making</b>			
Is there a current Development Plan in place that is within the plan period?	Yes		No
LDP preparation deviation from the dates specified in the original Delivery Agreement, in months	<12	13-17	18+
Time taken to commence formal revision of an LDP following the triggering of Regulation 41, in months	<12	13-17	18+
Has an LDP Revision Delivery Agreement been submitted to and agreed with the Welsh Government?	Yes		No
LDP review deviation from the dates specified in the original Delivery Agreement, in months	<3		4+
Annual Monitoring Reports produced following LDP adoption	Yes		No
The local planning authority's current housing land supply in years	>5		<5
<b>Efficiency</b>			
Percentage of "major" applications determined within time periods required	>60	50.1-59.9	<50
Average time taken to determine "major" applications in days	Not set	Not set	Not set
Percentage of all applications determined within time periods required	>80	70.1-79.9	<70
Average time taken to determine all applications in days	<67	67-111	112+
Percentage of Listed Building Consent applications determined within time periods required	>80	70.1-79.9	<70

WALES AVERAGE	Pembrokeshire Coast National Park LPA LAST YEAR	Pembrokeshire Coast National Park LPA THIS YEAR
Yes	Yes	Yes
73	N/A	N/A
17	-	23
Yes	-	Yes
1	-	0
Yes	Yes	Yes
6 of 25	1.2	1.4
68	86	100
232	162	224
88	85	90
77	71	69
75	79	100

MEASURE	GOOD	FAIR	IMPROVE
<b>Quality</b>			
Percentage of Member made decisions against officer advice	<5	5-9	9+
Percentage of appeals dismissed	>66	55.1-65.9	<55
Applications for costs at Section 78 appeal upheld in the reporting period	0	1	2+
<b>Engagement</b>			
Does the local planning authority allow members of the public to address the Planning Committee?	Yes		No
Does the local planning authority have an officer on duty to provide advice to members of the public?	Yes		No
Does the local planning authority's web site have an online register of planning applications, which members of the public can access, track their progress (and view their content)?	Yes	Partial	No
<b>Enforcement</b>			
Percentage of enforcement cases investigated (determined whether a breach of planning control has occurred and, if so, resolved whether or not enforcement action is expedient) within 84 days	>80	70.1-79.9	<70
Average time taken to take positive enforcement action	<100	101-200	200+

WALES AVERAGE	Pembrokeshire Coast National Park LPA LAST YEAR	Pembrokeshire Coast National Park LPA THIS YEAR
9	2	4
68	50	100
0	1	0
Yes	Yes	Yes
Yes	Yes	Yes
Yes	Partial	Partial
77	70	80
167	468	332

**SECTION 1 – PLAN MAKING**

Indicator	01. Is there a current Development Plan in place that is within the plan period?	
“Good”	“Fair”	“Improvement needed”
A development plan (LDP or UDP) is in place and within the plan period	N/A	No development plan is in place (including where the plan has expired)

Authority’s performance	Yes
The Authority has an adopted Local Development Plan until 2021 and LDP 2 is currently under examination with the Planning Inspectorate. It is anticipated that LDP 2 will be adopted in the financial year 2019/2020	

Indicator	02. LDP preparation deviation from the dates specified in the original Delivery Agreement, in months	
“Good”	“Fair”	“Improvement needed”
The LDP is being progressed within 12 months of the dates specified in the original Delivery Agreement	The LDP is being progressed within between 12 and 18 months of the dates specified in the original Delivery Agreement	The LDP is being progressed more than 18 months later than the dates specified in the original Delivery Agreement

Authority’s performance	N/A
N/A	



<b>Indicator</b>	<b>03. Time taken to commence formal revision of an LDP following the triggering of Regulation 41, in months</b>	
<b>“Good”</b>	<b>“Fair”</b>	<b>“Improvement needed”</b>
The Delivery Agreement is submitted less than 12 months after Regulation 41 is triggered	The Delivery Agreement is submitted within 12 and 18 months after Regulations 41 is triggered	The Delivery Agreement is submitted more than 18 months after Regulation 41 is triggered

<b>Authority’s performance</b>	<b>23</b>
The LDP review is now under examination	

<b>Indicator</b>	<b>04. Has an LDP Revision Delivery Agreement been submitted to and agreed with the Welsh Government?</b>	
<b>“Good”</b>		<b>“Improvement needed”</b>
An LDP Revision Delivery Agreement has been submitted by the LPA and agreed with the Welsh Government		No LDP Revision Delivery Agreement has been submitted by the LPA or agreed by the Welsh Government

<b>Authority’s performance</b>	<b>Yes</b>
The LDP review is now under examination	

<b>Indicator</b>	<b>05. LDP revision deviation from the dates specified in the original Delivery Agreement, in months</b>	
<b>“Good”</b>		<b>“Improvement needed”</b>
The LDP revision is being progressed within the dates specified in the original Delivery Agreement		The LDP revision is being progressed later than the dates specified in the original Delivery Agreement

<b>Authority’s performance</b>	<b>0</b>
The LDP review is now under examination	

<b>Indicator</b>	<b>06. Annual Monitoring Reports produced following LDP adoption</b>	
<b>"Good"</b>		<b>"Improvement needed"</b>
An AMR is due, and has been prepared		An AMR is due, and has not been prepared in time

<b>Authority's performance</b>	Yes

<b>Indicator</b>	<b>07. The local planning authority's current housing land supply in years</b>	
<b>"Good"</b>		<b>"Improvement needed"</b>
The authority has a housing land supply of 5 years or more		The authority has a housing land supply of less than 5 years

<b>Authority's performance</b>	1.4
Detailed response to performance against the indicator above.	

## SECTION 2 - EFFICIENCY

Indicator	08. Percentage of "major" applications determined within time periods required	
"Good"	"Fair"	"Improvement needed"
60% or more of applications are determined within the statutory time period	Between 50% and 60% of applications are determined within the statutory time period	Less than 50% of applications are determined within the statutory time period

Authority's performance	100
<p>The Authority determined 9 major applications within the determination period and performed extremely well in comparison to the Wales average of 68%.</p> <p>Statutory designation does not prohibit development, but proposals for development must be carefully assessed for their effect on those natural heritage interests which the designation is intended to protect. In National Parks, special considerations apply to major development proposals which are more national than local in character.</p>	

Indicator	09. Average time taken to determine "major" applications in days	
"Good"	"Fair"	"Improvement needed"
Target to be benchmarked	Target to be benchmarked	Target to be benchmarked

Authority's performance	224
<p>Although this figure has not been benchmarked, again the Authority performed well and was well below the all Wales average of 232 days. Some of major applications were subject to complex negotiations, Appropriate Assessments and S106 agreements, which impacted on the length of time to final determination.</p>	

Indicator	10. Percentage of all applications determined within time periods required	
"Good"	"Fair"	"Improvement needed"
80% or more of applications are determined within the statutory time period	Between 70% and 80% of applications are determined within the statutory time period	Less than 70% of applications are determined within the statutory time period

Authority's performance	90
The Authority fell into the 'Good' category for the performance in terms of determination of applications within the determination period. The 'time periods required' refers to agreed extensions of time, the Authority has reviewed processes in terms of determination periods and has introduced a more robust system to ensure that extensions of times are agreed on applications which exceed the original determination period.	

Indicator	11. Average time taken to determine all applications in days	
"Good"	"Fair"	"Improvement needed"
67 days or less	Between 67 and 111 days	Greater than 112 days

Authority's performance	69
Whilst the Authority fell into the 'Fair' Category, in comparison to the rest of Wales the Authority performed well. The Authority's performance compares well against the Wales Average of 77 days and has reduced from 71 in 2017/18. A target has been set for the forthcoming year to achieve an average time for determination of all applications of 66 days.	

Indicator	12. Percentage of Listed Building Consent applications determined within time periods required	
"Good"	"Fair"	"Improvement needed"
80% or more of applications are determined within the statutory time period	Between 70% and 80% of applications are determined within the statutory time period	Less than 70% of applications are determined within the statutory time period

Authority's performance	100
The Authority's performance compares extremely well against the Wales average of 75% . The Authority have delegation from Cadw to determined listed building application for works to Grade II listed buildings and offer a pre-application service, which greatly assists in the performance of the Authority and the quality and suitability of the application submissions.	

### SECTION 3 - QUALITY

Indicator	13. Percentage of Member made decisions against officer advice	
"Good"	"Fair"	"Improvement needed"
Less than 5% of decisions are made contrary to officer advice	Between 5% and 9% of decisions are made contrary to officer advice	More than 9% of decisions are made contrary to officer advice

Authority's performance	4
The Authority takes a higher percentage of planning applications to DM committee than the average percentage taken by Wales' planning authorities. Decisions were made against officer recommendation and contrary to local and national policy, the Authority will run training session in respect of these areas.	

Indicator	14. Percentage of appeals dismissed	
"Good"	"Fair"	"Improvement needed"
More than 66% of planning decisions are successfully defended at appeal	Between 55% and 66% of planning decisions are successfully defended at appeal	Less than 55% of planning decisions are successfully defended at appeal

Authority's performance	100
This Authority has performed well this year in defending its decisions at appeal, which shows the Authority is correctly applying National and local policies to its decisions.	

Indicator	15. Applications for costs at Section 78 appeal upheld in the reporting period	
"Good"	"Fair"	"Improvement needed"
The authority has not had costs awarded against it at appeal	The authority has had costs awarded against it in one appeal case	The authority has had costs awarded against it in two or more appeal cases

Authority's performance	0
One application for costs was made during 2018/19 which was successfully defended by the Authority.	

**SECTION 4 – ENGAGEMENT**

<b>Indicator</b>	<b>16. Does the local planning authority allow members of the public to address the Planning Committee?</b>	
<b>“Good”</b>		<b>“Improvement needed”</b>
Members of the public are able to address the Planning Committee		Members of the public are not able to address the Planning Committee

<b>Authority’s performance</b>	Yes
Members of the public are able to address development management committee – the time allocated for this is 5 minutes for the applicant/agent, objector, supporter, Community/Town Council and local Councillor. The Chair of the meeting also invariably requests the speaker remains available to answer any questions/queries from members regarding their presentation.	

<b>Indicator</b>	<b>17. Does the local planning authority have an officer on duty to provide advice to members of the public?</b>	
<b>“Good”</b>	<b>“Fair”</b>	<b>“Improvement needed”</b>
A duty planning officer is available during normal office hours	A duty planning officer is available, but not always during normal office hours	There is no duty planning officer available

<b>Authority’s performance</b>	Yes
We have a duty officer day – Thursdays. This is for members of the public generally to speak with a planning officer to obtain advice on planning queries. This is a free service which is appreciated. Most of the half hour slots are booked in advance. Takers can either come into the office to have a face-to-face meeting or reserve the slot for a telephone conference call. The duty officer service is what respondents to the survey valued most.	

<b>Indicator</b>	<b>18. Does the local planning authority's web site have an online register of planning applications, which members of the public can access track their progress (and view their content)?</b>	
<b>"Good"</b>	<b>"Fair"</b>	<b>"Improvement needed"</b>
All documents are available online	Only the planning application details are available online	No planning application information is published online

<b>Authority's performance</b>	<b>Partial</b>
<p>The Authority has the online facility whereby the details, including description, case officer, decision and other details, of the application can be viewed online. The Development Management Committee report is made available online and contains images of the relevant plans for each application being considered. The limitation of the system is that the documents that support an application are not available for viewing online. On major applications the Authority uploads the key application plans and documents to the website.</p> <p>The Authority has now addressed this limitation and since March 2019 applications are available to inspect online.</p>	

**SECTION 5 – ENFORCEMENT**

<b>Indicator</b>	<b>19. Percentage of enforcement cases investigated (determined whether a breach of planning control has occurred and, if so, resolved whether or not enforcement action is expedient) within 84 days</b>	
<b>“Good”</b>	<b>“Fair”</b>	<b>“Improvement needed”</b>
80% or more of enforcement cases are investigated in 84 days	Between 70% and 80% of enforcement cases are investigated in 84 days	Less than 70% of enforcement cases are investigated in 84 days

<b>Authority’s performance</b>	<b>80</b>
The Authority have been fully staffed in the Enforcement Team during 2018/19 and in addition to achieving the “Good” rating cleared the historic backlog of applications.	

<b>Indicator</b>	<b>20. Average time taken to take positive enforcement action</b>	
<b>“Good”</b>	<b>“Fair”</b>	<b>“Improvement needed”</b>
100 days or less	Between 101-200 days	Greater than 200 days

<b>Authority’s performance</b>	<b>332</b>
The Authority’s performance here is poor and is well in excess of the Wales average . However the figure is an improvement on the 2017/18 figure of 468. The poor performance in this area was expected due to the work undertaken to clear the historic backlog of enforcement cases.	



## SECTION 6 – SUSTAINABLE DEVELOPMENT INDICATORS

The purpose of the Sustainable Development Indicators is to measure the contribution the planning system makes to sustainable development in Wales.

The Sustainable Development Indicators will be used to measure the progress against national planning sustainability objectives, set out in Planning Policy Wales, and can be used to demonstrate to our stakeholders the role and scope of the planning system in delivering wider objectives. The information will also be useful to local planning authorities to understand more about the outcomes of the planning system and help inform future decisions.

<b>Indicator</b>	<b>SD1. The floorspace (square metres) granted and refused planning permission for new economic development on allocated employment sites during the year.</b>
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<b>Granted (square metres)</b>	
<b>Authority's data</b>	0

<b>Refused (square metres)</b>	
<b>Authority's data</b>	0

In terms of the current Local Development Plan (adopted 2010) the target was to have 33% of the land allocations with permission by the end of the financial year 2014/15 or at the end of the 2015-16 financial year. 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. This issue is being addressed as part of the Local Development Plan Review. This does not however mean that no employment activities are approved in the National Park. By way of example 773 applications were approved for employment related uses in the Plan period (as at end of April 2017) but these were not on allocated sites. No planning permissions were refused on allocated sites.

<b>Indicator</b>	<b>SD2. Planning permission granted for renewable and low carbon energy development during the year.</b>
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<b>Granted permission (number of applications)</b>	
<b>Authority's data</b>	7

<b>Granted permission (MW energy generation)</b>	
<b>Authority's data</b>	0

The Plan area makes a small contribution in terms of gigawatt hours of energy, rather than megawatts. The Local Development Plan has exceeded the electricity generation target (if all those with permission are assumed to have been constructed) but remains significantly behind on heat generation. Development interest for solar panels, biomass and anaerobic digestion still exists although demand for wind turbines has significantly decreased in the last four to five years.

<b>Indicator</b>	<b>SD3. The number of dwellings granted planning permission during the year.</b>
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<b>Market housing (number of units)</b>	
<b>Authority's data</b>	211

<b>Affordable housing (number of units)</b>	
<b>Authority's data</b>	95

Planning permission was granted for 95 affordable units this reporting year

<b>Indicator</b>	<b>SD4. Planning permission granted and refused for development in C1 and C2 floodplain areas during the year.</b>
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<b>Number of residential units (and also hectares of non-residential units) which were GRANTED permission</b>	
<b>Authority's data</b>	0

<b>Number of residential units (and also hectares of non-residential units) which were REFUSED permission on flood risk grounds</b>	
<b>Authority's data</b>	0

No applications for new residential units were determined during 2018/19.

<b>Indicator</b>	<b>SD5. The area of land (ha) granted planning permission for new development on previously developed land and greenfield land during the year.</b>
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<b>Previously developed land (hectares)</b>	
<b>Authority's data</b>	Nil

<b>Greenfield land (hectares)</b>	
<b>Authority's data</b>	Nil

Year		Target for Brownfield %	Greenfield %	Brownfield %
2015/16	Housing (Plan Review) Completions	33	17.8	82.2
2015/16	Employment Permission	45	38	62
2016/17	Housing Completions	33	15	85
2016/17	Employment Permission	45	23	77
2017/18	Housing Completions	33	21	79
2017/18	Employment Permission	45	39	61
2018/19	Housing Completions	33	39	61
2018/19	Employment Permission	45	23	77

The Authority monitors the number of housing units and the number of employment permissions that are on greenfield and brownfield land. The Plan consistently exceeds its target.

<b>Indicator</b>	<b>SD6. The area of public open space (ha) that would be lost and gained as a result of development granted planning permission during the quarter.</b>
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<b>Open space lost (hectares)</b>	
<b>Authority's data</b>	Nil

<b>Open space gained (hectares)</b>	
<b>Authority's data</b>	Nil

No open space was lost during the monitoring period.