

Pembrokeshire Coast National Park

Review Report

Underlined and in red = background paper on the website alongside the Review Report.

Pembrokeshire Coast National Park
Local Development Plan
(Adopted September 2010)

June 2016

PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY

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A Aim of this Report

1. Each Local Planning Authority is required by the 2004 Planning and Compulsory Purchase Act 2004 to undertake regular reviews of the Local Development Plan at intervals no longer than 4 years from the time when it was adopted. This is to ensure that there is a regular and comprehensive assessment of whether the plan remains up to date or whether changes are needed. The Pembrokeshire Coast National Park Local Development Plan was adopted in September 2010. The Local Development Plan monitoring and review section proposes a full review of the Plan at the end of the financial year 2014-2015. The Authority has been awaiting the publication of Welsh Government regulations guidance on the review and revision process. This was published in August 2015. The compilation of this report and updating of the supporting evidence is the first stage of that process.
2. The Review Report sets out areas where the Plan is delivering, areas where it needs to change and why, the key issues and the impact on the strategy, policies, sites and their interrelationship. A replacement Plan will be prepared. As progress through the Plan Revision is made this interrelationship will be further explored and developed as proposed changes are identified and their sustainability credentials assessed.
3. The Review Report also sets out the evidence base that has been considered by summarising;
 - the key findings in the published [Annual Monitoring Reports](#) (including issues arising from Sustainability Appraisal monitoring);
 - Evidence gathered through updated [survey evidence](#) and pertinent contextual indicators, including relevant changes to national policy.
4. The evidence base has been assessed against the tests of soundness. Evidence will be updated and amended as needed as the replacement Plan progresses to adoption. The [Evidence Base Sensitivities Background Paper](#) highlights where further elements of the evidence base may change or be updated through the revision process.
5. The Review Report is required not to detail changes that may be made to the Plan so that it does not pre-empt the outcome of the revised Plan.
6. The Review Report concludes that a full revision of the Local Development Plan is required and sets out the procedure that the Authority intends to follow.
7. The engagement with other bodies and organisations the Authority undertook preparing this Report is also set out.

8. Sustainability Appraisal implications will be identified alongside any proposed policy changes at a later stage. At present the Review Report can only identify areas of change rather than how the Plan will be changed. Therefore the sustainability appraisal implications cannot be identified in any meaningful way.
9. When preparing or revising a Local Development Plan the National Park Authority must ensure that the Plan is prepared correctly and it meets the 3 tests of soundness¹:
 - Does the Plan fit? (i.e. is it clear that the Plan is consistent with other Plans?)
 - Is the plan appropriate? (i.e. is the plan appropriate for the area in light of the evidence?)
 - Will the Plan deliver? (i.e. is it likely to be effective?)

Where change is identified the reasons for it include reference to the most pertinent soundness test/s that has informed the need for change.²

10. Finally, the Report sets out the next steps in preparing a replacement Local Development Plan.
11. Any proposed change in policy will be subject to public consultation in compliance with national policy, guidance and regulation. Policies can be ultimately added, amended or deleted from the Plan by the appointed Inspector. The Authority will follow the advice provided in section 2.8 of Planning Policy Wales Edition 8 January 2016 when considering the status of the emerging replacement Plan.

¹ In order to be adopted, a Local Development Plan must be determined 'sound' by the examination Inspector (Section 64 of the 2004 Planning and Compulsory Purchase Act). Tests of soundness and checks are identified in Planning Policy Wales Edition 8, January 2016, Chapter 2 and the Local Development Plan Manual Chapter 8.

² Local Development Plan Manual Edition 2 August 2015: <http://gov.wales/topics/planning/policy/policy-and-guidance-on-development-plans/ldpmanual/?lang=en>

B How this Report was prepared

12. The report was prepared by:

- Reviewing the Plan's evidence base (Background Papers, Research Reports commissioned etc.) See Authority's [website](#).
- Carrying out a series of workshops with the Authority's Members
- Reviewing National Planning Policy changes
- Considering contextual changes, for example more recently adopted neighbouring Local Development Plans
- Reviewing the Annual Monitoring Reports prepared between 2011 and 2015. See Authority's [website](#).
- Input from various stakeholders in relation to the above – further detail is provided below.

Table 1: Overview of engagement with others to date

Who?	How?
National Park Authority Members	<ul style="list-style-type: none"> ▪ Scrutiny Committee outcomes on specific topics ▪ Series of Local Development Plan topic-based workshops ▪ Opportunity to comment on draft Review Report
Pembrokeshire County Council	<ul style="list-style-type: none"> ▪ Direct contact with relevant officers³ for factual updates ▪ Officer meetings ▪ Peer review of evidence base ▪ Opportunity to comment on draft Review Report
Affordable Housing Working Group	<ul style="list-style-type: none"> ▪ Officer meetings with Housing Associations & Housing Authority ▪ Opportunity to comment on proposed areas of change identified in the Review Report
Natural Resources Wales	<ul style="list-style-type: none"> ▪ Direct contact with relevant officers for factual updates ▪ Officer meetings ▪ Technical review of evidence base ▪ Opportunity to comment on draft Review Report
Dŵr Cymru/Welsh Water	<ul style="list-style-type: none"> ▪ Direct contact with relevant officers for factual updates ▪ Opportunity to comment on draft Review Report

³ This includes Officers with responsibilities for: Development Planning, Highway Authority, Economic Development, Housing, Drainage and Coastal Defences, Community Facilities, Waste.

Who?	How?
Regional Minerals and Waste Planning Groups	<ul style="list-style-type: none"> ▪ Direct contact with relevant officers for factual updates ▪ Officer meetings ▪ Technical review of evidence base
Other neighbouring Planning Authorities including Welsh National Parks	<ul style="list-style-type: none"> ▪ Peer review of evidence base ▪ Opportunity to comment on draft Review Report
Landowners of sites designated for development.	<ul style="list-style-type: none"> ▪ Meetings, correspondence and phone calls to discuss progress with site delivery.
Home Builders Federation	<ul style="list-style-type: none"> ▪ Comment sought on relevant Background Papers
Town & Community Councils	<ul style="list-style-type: none"> ▪ Survey of community facilities ▪ Meetings on request to advise on the Local Development Plan Revision ▪ 4 Community Engagement Events April 2016
Stakeholder Engagement/ Awareness Raising	<ul style="list-style-type: none"> ▪ General Stakeholder event at Llanion ▪ Pembrokeshire Sustainable Agriculture Network ▪ PLANED Community Energy Network ▪ Pembrokeshire Business Panel
Public Consultation	<ul style="list-style-type: none"> ▪ Formal public consultation on Annual Monitoring Reports. ▪ Informal consultation on the Delivery Agreement ▪ Informal consultation on the Review Report ▪ Formal public consultation on the Sustainability Scoping Report

C Does the Local Development Plan need to be reviewed?

13. Yes it does need to be reviewed for the following reasons:

- Section 69 of the 2004 Planning and Compulsory Purchase Act requires a full review of the Local Development Plan at least every 4 years.
- The Local Development Plan monitoring and review section proposes a full review of the Plan at the end of the financial year 2014-2015.⁴
- The findings of the [Annual Monitoring Reports](#) for the periods Sept 2010 to March 2011, April 2012 to March 2013, April 2013 to March 2014 and April 2014 to March 2015 along with a full review of the Local Development Plan's original evidence ([Background Papers](#)) have been taken into account in producing this publication. They identify areas fundamental to the overall strategy where the Plan is not delivering as satisfactorily as was envisaged by the Authority.

14. For these reasons it is concluded that a full revision of the Plan is appropriate (rather than a short-form procedure which allows consideration of distinct parts of the Plan).

15. The Authority has engaged with other organisations, bodies and individuals to update the background evidence of the Plan and prepare this Review Report. Table 1 above sets out the main ways in which others have been engaged with the process to date.

16. A Delivery Agreement is also being prepared which will provide details of the way in which the Authority proposes to involve the local community and other stakeholders in the preparation of the replacement Local Development Plan. It will provide details of the stages of work and when and how different groups, organisations and individuals can participate. It will also set out a timetable detailing how long each stage is anticipated to take and how much time will be provided for formal public consultation. The main stages of the process are set out below:

Table 2 Main Stages of Plan Preparation

Stage	Main purpose
Review Report	<ul style="list-style-type: none">• Identifies the parts of the Local Development Plan that need to be revised.• Publish background papers (evidence base) in support.

⁴ The Planning and Compulsory Purchase Act 2004, Chapter 5, Part 6, Wales, Plans Section 69 advises that a local planning authority must carry out a review of their local development plan at such times as the assembly prescribes. Section 70 (2) (b) advises that the authority must prepare a revision of a local development plan if, following a review under Section 69, they think that the plan should be revised. The Welsh Statutory Instrument 2005 No.2839 The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 Section 41 requires a local planning authority to commence a full review of its Local Development Plan every four years from the date of its initial adoption.

	Delivery Agreement	<ul style="list-style-type: none"> • Timetable for producing the replacement Local Development Plan. • Community Involvement Scheme outlining the principles of community engagement.
We are here →	Candidate Sites	<ul style="list-style-type: none"> • Publish criteria for site selection. • Invite site submissions.
	Preferred Strategy	<ul style="list-style-type: none"> • Set out the key strategic policies for the Local Development Plan • Identify sites which fit with the Strategy
	Deposit Plan	<ul style="list-style-type: none"> • Prepare and publish the detailed policies and proposals map.
	Submission	<ul style="list-style-type: none"> • Submit the Plan and supporting evidence to the Planning Inspectorate.
	Examination	<ul style="list-style-type: none"> • An independent Inspector assesses the soundness of the Plan.
	Adoption	<ul style="list-style-type: none"> • The Authority adopts the Plan and uses it in making planning decisions.

Key Findings

17. The Authority has prepared four [Annual Monitoring Reports](#) since the Local Development Plan was adopted in 2010.
18. These monitoring reports assess the extent to which the Local Development Plan strategy policies and sites are being delivered. Key findings are set out at the beginning of each Report.
19. Taking account of all four annual monitoring reports below is a summary of areas where the Plan is delivering and also where the Plan is not delivering.
20. The Plan identifies 17 key outcomes to be achieved by the end of the Plan period (i.e. 2021). Thirty-seven indicators and targets are grouped beneath these outcomes to test the performance of the Plan.

Table 3: Extract from 2015 Local Development Plan Annual Monitoring Report⁵

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	

21. Details are provided on performance to date under each of the outcomes below.
22. In summary for the 2015 Annual Monitoring Report 31 of the Plan's 37 targets and objectives are being met. There are issues with 6, some of which are fundamental to the delivery of the Local Development Plan. These are housing and affordable housing delivery, and the delivery of other land allocations. The year the issue first emerges in the relevant Annual Monitoring Report is also identified. Issues from all Monitoring Reports are therefore included in the analysis below.
23. The first part of this chapter provides a summary of the areas of achievement and underperformance. The second part provides further

⁵ Issues highlighted in the four Annual Monitoring Reports that require action through a revision of the Plan are identified.

detail on where the Local Development Plan is not delivering. Commentary and action points both in the interim and for revision stage are provided for those that are underperforming.

Performance measured against indicators

24. The Local Development Plan sets out a Vision and Objectives to be achieved by the end date of the Plan (currently 2021). The key outcomes for each section of the Plan are set out below, followed by a table identifying indicators with targets to achieve which together are a means of measuring the effects of strategies and policies contained in the Plan. From the following series of tables it is possible to identify which aspects of the Plan are on target and which need to be reassessed through the revision process.

National Park Purposes & Duty and the Spatial Strategy

Plan Outcomes

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

Table 4 Performance for Purposes, Duty and Strategy

Policy Area	Indicator	Target	Performance	Commentary
All	1: Approvals contrary to recommendation	0		Target has been met and there is no concern over the implementation of this policy.
National Park Purpose and Duty	2: Developments which engage the Sandiford Principle – where conflict between the 2 National Park Purposes becomes acute, the first must prevail. Carrying out the socio-economic duty must be in pursuance of the purposes to Policy 1.	0		Target has been met and there is no concern over the implementation of this policy.
Visitor Economy	3a: Prioritising affordable housing over self-catering development in certain circumstances.	Approval of 2 applications contrary to Policy 35c in any one year		Target has been met and there is no concern over the implementation of this policy.
Employment and housing	3b: The need to prioritise community uses or affordable housing when re-using employment sites for other uses.	0		Target has been met and there is no concern over the implementation of this policy.
Spatial strategy – town to	4: Effectiveness of policies 2 to 7 when used at appeal.	Inspector does not raise issues regarding the		Target has been met. (Development in the countryside is considered against the ability to access

countryside		effectiveness of the policies or supporting supplementary planning guidance.		the site without use of a private car, detailed in Supplementary Planning Guidance in Accessibility. The approach is proving challenging to operate and will be considered as part of the Revision process. (Further detail is set out in Section F.)
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Special Qualities

Plan Outcomes

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

Table 5 Performance for Special Qualities

Policy Area	Indicator	Target	Performance	Commentary
Special qualities	5: Approvals contrary to strategy policy 8, Special Qualities.	0		Target has been met and there is no concern over the implementation of this policy.
Policies 1 and 8 to 18 and Supplementary Planning Guidance	6: Effectiveness of Policies 1 and 8 to 18 and Supplementary Planning Guidance on: Landscape character, Conservation Area Proposals, Regionally Important Geodiversity Sites and Historic Environment – when dealing with applications at appeal.	Inspector does not raise issues regarding the effectiveness of the policies or supporting supplementary planning guidance.		Target has been met and there is no concern over the implementation of these policies.

Major Development and the potential for growth

Outcomes

- a) No new major development in the National Park unless there are exceptional circumstances.
- b) 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.

Table 6 Performance for Major Development and the potential for growth

Policy Area	Indicator	Target	Performance	Commentary
Major development	7: Major development applications only	0		Target has been met and there is no concern over the implementation of this

	permitted which meet the national planning policy tests.			policy.
Minerals	8: Applications for new minerals sites only granted where they meet national planning policy tests.	0		Target has been met and there is no concern over the implementation of this policy.
Waste	33: 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.		Target has been met and there is no concern over the implementation of this policy.
Major development	9: Effectiveness of policies 19 to 28 and Supplementary Planning Guidance on Land instability from coal workings and Safeguarding minerals - when dealing with applications at appeal.	Inspector does not raise issues regarding the effectiveness of the policies or supporting supplementary planning guidance.		Target has been met and there is no concern over the implementation of these policies.

Climate Change, sustainable design, flooding, sustainable energy

Outcomes

- a) Development achieving high standards in terms of sustainable design with all new dwellings meeting the standards set out in national planning policy.
- b) The National Park contributing to renewable energy generation.
- c) No vulnerable development⁶ in areas which would be at risk of flooding both now and in the long term and with no negative impacts elsewhere.

Table 7 Performance for Climate Change, sustainable design, flooding, sustainable energy

Policy Area	Indicator	Target	Performance	Commentary
Renewable energy	12a: Capacity of renewable energy schemes permitted and completed.	Planning permissions to contribute to an overall target for the National Park of 4.91GWh.		Target has been met and there is no concern over the implementation of this policy. The Authority's policy on permitting renewable energy schemes is achieving its target for renewable electricity generation and ensuring that proposals are consistent with the Authority's guidance on renewables.
Renewable energy	12b: The achievement of renewable heat targets.	Planning permissions to contribute to an overall Renewable Heat Target for	Annual Monitoring Report 2012	Target has not been met primarily due to the substantial contribution that biomass was expected to make not being able to be counted in the figures as it generally enjoys permitted development rights. The implication that

⁶ 'Vulnerable developments' are defined in the Technical Advice Note 15: Development and Flood Risk on flooding, please see Figure 2 page 7: [http://hew.wales.gov.uk/docrepos/40382/epc/planning/403821/40382/403821/\(560\)_july04-tan15-e.pdf?lang=en](http://hew.wales.gov.uk/docrepos/40382/epc/planning/403821/40382/403821/(560)_july04-tan15-e.pdf?lang=en)

Policy Area	Indicator	Target	Performance	Commentary
		the National Park of 26GWh.		the policy is performing well and only the indicator target needs to change
Renewable energy guidance	12c: Supplementary planning guidance on: Renewable Energy and Cumulative Impact of Wind Turbines on Landscape and Visual Amenity	All decision-making is consistent with this guidance		Target has been met and there is no concern over the implementation of this policy.
Flooding	13: Amount of development permitted in floodplain areas not meeting TAN15 tests.	Development is not permitted where the long-term scenario would fail the TAN15 tests.		Target has been met and there is no concern over the implementation of this policy.
Previously developed land	14: Percentage of 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.		Target has been met for housing and employment developments and there is no concern over the implementation of this policy. The Plan is ahead of target for both uses.
Climate change, sustainable design, flooding and sustainable energy	15: Effectiveness of policies 29-34 and Supplementary Planning Guidance (Sustainable Design Guidance, Renewable Energy) at appeals and when dealing with applications at appeal.	Inspector does not raise issues regarding the effectiveness of the policies or supporting supplementary planning guidance.		Target has been met and there is no concern over the implementation of these policies.

Visitor Economy, employment and rural diversification

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

Table 8 Performance for Visitor Economy, employment and rural diversification

Policy Area	Indicator	Target	Performance	Commentary
Employment sites	17: Loss of employment sites	0 approvals, except where justified within		Target has been met and there is no concern over the implementation of this policy.

		the terms of the policy.		
Visitor accommodation	18: Maintaining current levels of holiday accommodation except where justification is proven.	Maintain current levels except where change is proven.		Target has been met. The long-standing policy of restraint on caravan and camping sites is being increasingly tested by unauthorised development gaining certificate of lawful use. A study has been undertaken to assess the capacity of the National Park landscape to absorb further development of this type. There is also increasing demand for new and extended sites.
Special qualities	19: Proposals for recreational activity contrary to Policy 8.	0 approvals		Target has been met and there is no concern over the implementation of this policy.
Visitor economy, employment and rural diversification	20: Effectiveness of policies 35 to 43 and Supplementary Planning Guidance on Recreational Activities and Loss of Hotels when dealing with applications at appeals.	Inspector does not raise issues regarding the effectiveness of the policies or supporting supplementary planning guidance.		Target has been met and there is no concern over the implementation of these policies.

Affordable housing and housing growth

Outcomes

- a) An estimated 1,600 new dwellings are provided of which a minimum of 530 new affordable homes are provided.
- b) 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.
- c) A higher density of development is achieved – a minimum of 30 dwellings to the hectare in the Local Development Plan's Centres.

Table 9 Performance for Affordable Housing and Housing Growth

Policy Area	Indicator	Target	Performance	Commentary
Housing	21: The housing land supply taken from the current Housing Land Availability Study.	Minimum 5 years supply	Annual Monitoring Report 2012	The Authority has not achieved a 5-year land supply since the Local Development Plan was adopted and the continuing drop in supply is caused by a variety of factors, the most common being a lack of interest by landowners to develop their land allocations in the short and medium term. The Authority will need to revise the housing land allocations.
Housing	22: The number of net additional affordable and general market	530 affordable dwellings over the Plan period.	Annual Monitoring Report 2012	Whilst interest in developing sites allocated in the Plan has increased significantly in recent times, along with

	dwelling built.	1000 general market dwellings built, In total a completion rate of 90 per annum		an increase in development of sites coming forward as small-scale, speculative proposals, this has not been sufficient to make up for poor completion rates at the beginning of the Plan period. The Authority will need to revise the housing land supply to ensure there is sufficient to meet the new Plan timescale (2031).
Delivery of site allocations	23: Amount of development, including housing, permitted on allocated sites in the Plan as a percentage of Plan allocations and a percentage of total development permitted.	Allocations – 100% by the end of the Plan period on allocated sites.	Housing (a) ⁷ Employment /Mixed use (b) ⁸ Community Facilities (c) Road and Cycle Schemes (d) ⁹	The low rate of development on housing and employment/mixed use sites to date will need to be addressed through the Plan Revision as set out above. The road and cycle schemes are listed in the Plan and are proposals of other authorities or bodies. Some of these schemes have become outdated or have been superseded. This will require updating in the Revised Plan.
Housing density	24: Average density of housing development permitted on Development Plan sites.	30 per hectare in the Plan Centres.		Target has been met and there is no concern over the implementation of this policy.
Affordable housing and housing growth	25: Effectiveness of policies 44 to 47 and Supplementary Planning Guidance on Affordable Housing and Low Impact Development when dealing with applications at appeals.	Inspector does not raise issues regarding the effectiveness of the policies or supporting supplementary planning guidance.		Target has been met. Issues relating the effectiveness of this part of the Plan are detailed above.

⁷ Annual Monitoring Report 2014

⁸ Annual Monitoring Report 2014

⁹ Annual Monitoring Report 2014

Community Facilities, Retailing and Transport

Outcomes

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

Table 10 Community Facilities, Retailing and Transport

Policy Area	Indicator	Target	Performance	Commentary
Community facilities	26: Number of approvals for loss of community facilities.	0 unless justified by policy framework		Target has been met and there is no concern over the implementation of this policy.
Community facilities	27: Number of planning obligations for community facilities secured from development.	S106 Agreements secured in line with Supplementary Planning Guidance		Target has been met and there is no concern over the implementation of this policy.
Greenfield land and open space	28: Amount of greenfield land and open space lost to development which is not allocated in the Plan.	Greenfield land – 0%, except for affordable housing or community facility provision. Open space – 0%, unless justified by policy framework.		Target has been met and there is no concern over the implementation of this policy.
Retail	30: Percentage of vacant retail floor space.	No greater than 10%		Target has been met and there is no concern over the implementation of this policy.
Transport	31: Approvals for development without providing access for vehicles, cyclists and pedestrians.	0		Target has been met and there is no concern over the implementation of this policy.
Transport impacts	32: Approvals for development causing significant concerns regarding potential transport impacts.	0		Target has been met and there is no concern over the implementation of this policy.
Community facilities, retailing and transport	34: Effectiveness of policies 48 to 56 and Supplementary Planning Guidance on Planning Obligations when dealing with applications at appeal.	Inspector does not raise issues regarding the effectiveness of the policies or supporting supplementary planning guidance.		Target has been met and there is no concern over the implementation of these policies.

Areas of the Plan that are not working well

25. This section sets out in greater detail where issues of underperformance have been identified through the four Annual Monitoring Reports as summarised above. The issue that needs to be addressed is identified along with the Plan elements likely to be affected and how the need to address the specific soundness tests has helped inform the need for change.
26. For predominantly rural areas, the spatial scale of individual areas of change is unlikely to be significant. For these areas there may be scope to consider options for a more generic “rural strategy”. This could consider broad policy options and principles with regard to issues such as affordable housing, village scale allocations, the role and development of market towns, farm diversification, the settlement hierarchy and roles in terms of service provision, and so on.¹⁰ This is the approach taken when drafting the adopted Local Development Plan and the National Park Authority will continue with this approach through Plan revision.

Housing Land Supply

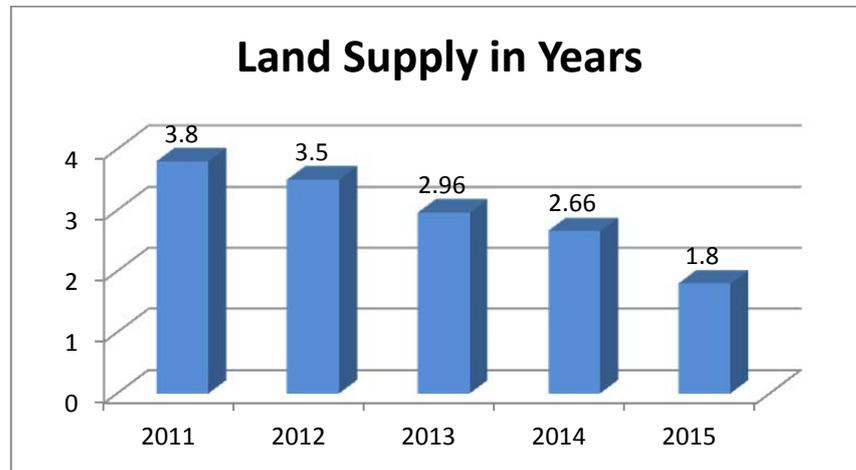
27. The Authority is required to demonstrate a five year effectively available housing land supply. The methodology used to calculate the supply is the ‘residual method’.

Table 11 Residual Method

THE RESIDUAL METHOD
a. Using the number of houses needed over the Plan period (identified in the Local Development Plan);
b. Subtract the number of houses which have already been built;
c. Divide the remaining number by the number of years the Plan has left to run. This gives a yearly requirement;
d. Multiply the yearly requirement by 5 to give a 5-year requirement;
e. Work out how many houses could be built within a 5-year period (i.e. no physical constraints and the landowner or developer ready to bring site forward for development);
F. Divide the supply (E) by the 5-year requirement (D) to give a land supply in years.

28. The following graph shows that the National Park has not had a 5-year land supply since the Plan was adopted in September 2010.

¹⁰ : Local Development Plan Manual August paragraph 6.2.3.4, page 64



29. 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 recent times 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. The Authority produced new Supplementary Planning Guidance on Affordable Housing, to assist with bringing sites forward, in November 2014.
30. The Authority will also need to revise the housing land supply to ensure that the supply is sufficient to meet the new Plan timescale (2031)¹¹, as well as to ensure that there are no fundamental impediments to the development of the sites allocated in the Plan and to be able to specify the timescales within which constraints can be overcome.

How this impacts on the Plan Strategy

31. Low building rates at the start of the current Plan period mean that not all of the land allocated to accommodate new housing development will be used before its end date of 2021, and the targets for affordable housing delivery are not being met.
32. Population forecasts in the Plan's housing strategy indicate a slight decline in the number of people living in the Park over the Plan period. With no reason to allocate housing land to house an increasing population, there nevertheless remains a need to build more affordable houses. The proportion of affordable to market housing needs to better reflect housing requirements in the National Park. Market housing is required to help cross-subsidise affordable housing provision as the amount required is much greater than can be provided with public funds alone.

¹¹ Please see section 'Is the evidence on which the Local Development Plan is based up to date?' which explains this requirement.

33. A full revision of the Local Development Plan is necessary because the Authority will need to review the housing land supply to ensure that the supply is sufficient to meet the new Plan timescale (2031), that there are no fundamental impediments to the development of the sites allocated in the Plan, and to be able to specify the timescales within which constraints can be overcome. This will necessitate reviewing housing provision figures, preparing a Candidate Site Register and reviewing affordable housing requirements. This has potential implications for many Centres identified in the National Park and therefore a full rather than partial revision is needed.

These changes are necessary in order to address the following Soundness Tests	
1	<i>Does the Plan have regard to national policy?</i>
2	<i>Does it seek to meet the assessed needs?</i>
3	<i>Will development be viable?</i>

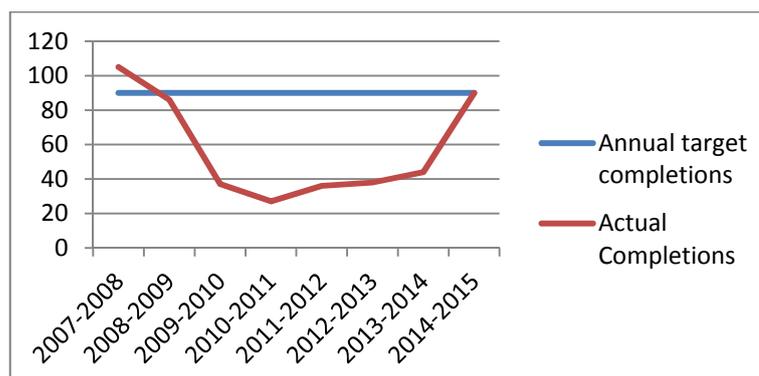
Housing building rates & Local Development Plan targets

34. Between 1999 and 2009 the Plan's completion rate was an average of 89 per annum. It was anticipated that the provision figure of 1,349 would deliver an estimated 90 units per annum over the Plan period with the flexibility of an additional windfall provision of 250. Building rates fluctuate significantly in Pembrokeshire and there has been a considerable drop in completions during the recession. This has improved more recently. These build rates suggest that the development industry in Pembrokeshire is largely responsive to the overall housing market and the economy. Development in Pembrokeshire is largely bespoke rather than speculative. Looking at historic building rates in the National Park a consistent building rate of 90 per annum has never been reached.

Table 12 Housing Delivery 2007 to 2015

	Target Annual Completions	Completions Recorded	Target Annual Affordable Completions or u/c	Affordable Completions or u/c recorded
2007-2008	90	95	28	7
2008-2009	90	85	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	452	224	81

35. The graph below illustrates the shortfall to date with completions averaging 57 units per annum over the period 2007 to 2015.



36. Listed in the Local Development Plan's monitoring section is a provision for 1,600 dwellings (including the windfall figure of 250). This figure requires revision at the very least to take account of what the local house building industry rate is likely to be and to acknowledge that this will fluctuate annually. This in turn will impact on affordable housing delivery targets. The Welsh Government household projections are the starting point for assessing housing provision in Local Development Plans.

37. See [Housing Background Paper](#) for more information.

38. Spatially performance has been mixed.

39. The table below shows delivery against the adopted Local Development Plan expectations. Expectations of land allocations being delivered in Tenby, St Davids and in some Rural Centres have not been realised. More detail on individual sites is provided in Table 13 below.

Households	Housing Provision Figure 2007 to 2021	Completions 2007 to 2011	Completions 2011 to 15	Land with Planning Permission April 2015	15 to 21 Requirement	Annual Requirement
Tenby	514	64	83	46	321	54
Newport	48	15	2	14	17	3
Saundersfoot	115	54	31	39	-9	-2
St Davids	134	13	9	5	107	18
Crymych	15	0	0	18	-3	-1
Rural Centres & Countryside	523	98	83	65	276	46
Total	1349	244	208	187	709	118

Table 13 Housing Delivery versus Requirement 2007 to 2015

How this impacts on the Plan Strategy

40. This will mean that the housing provision figures would need to better reflect the ability of the local housing market to deliver and therefore the more ambitious targets of rates of development in the current Local Development Plan will not be repeated. This will in turn impact on affordable housing delivery targets. This issue will be addressed as part of the full revision triggered by poor land supply.

These changes are necessary in order to address the following Soundness Tests	
3	<p><i>Can the Plan be implemented?</i></p> <p><i>Is the plan sufficiently flexible?</i></p>

Affordable Housing

41. 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.

42. Between 2007 and 2015 a total of 81 affordable dwellings have either been completed or are under construction, 36% of the target.

43. Overall completions totalled 452, 63% of the overall target.

44. The Authority has taken interim steps in advance of a Full Revision of the Local Development Plan to address the issue. The method and approach to preparing the Authority's updated Supplementary Planning Guidance on Affordable Housing currently in operation (adopted November 2014) is set out in the Affordable Housing Delivery Project Report. (Appendix 2 to the [2014 Local Development Plan Annual Monitoring Report](#) refers). In summary there are changes to the level of affordable housing expected arising from changes in viability. The amount is reduced. The amount expected from affordable housing contributions is generally also reduced. It is anticipated that this methodology will be taken forward into Local Development Plan Revision.

How this impacts on the Plan Strategy

45. The existing Local Development Plan strategy has ambitious targets for affordable housing delivery. These have not been realised. An updated appraisal of viability is needed and this will mean revisiting the element of affordable housing required in market areas and that required on individual sites allocated in the Plan. Overall housing provision is being revisited as well which has implications for affordable housing delivery. This has potential implications for all parts of the Plan area including Centres identified in the National Park and therefore a full rather than partial revision is needed.

These changes are necessary in order to address the following Soundness Tests	
3	<i>Will development be viable?</i>

Development sites identified in the Plan

46. The expectation was to have 33% of the land allocations with permission by review stage (end of the financial year 2014/15). Progress with each allocated site is set out in the [Annual Monitoring Report 2015](#) (as at April 2015). This progress will continue to be monitored as the replacement Plan is prepared.

47. **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. A total of 60 houses have been completed on allocated sites which is 20% of the total number of units allocated in the Plan. The target is not being achieved. These sites will be reconsidered as part of the Local Development Plan Revision. Areas of the Plan for revision regarding housing land supply are identified under 'Housing Land Supply' and 'Affordable Housing' above.

48. **Employment/Mixed Uses (without market housing included):** The target was to have 33% of the land allocations with permission by review stage (end of the financial year 2014/15). This is not being achieved. 3

sites are allocated as shown the [Annual Monitoring Report 2015](#), 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 revision.

49. In anticipation of Local Development Plan Review owners and agents for sites were contacted to establish their intentions (letters sent on the 10th November 2014). Where no response was received or the intentions were still unclear a further letter was sent (letters sent on the 19th December 2014). Following this exercise it is still uncertain as to the likelihood of some allocation sites coming forward. The tables below are taken from the 2015 Local Development Plan Annual Monitoring Report.

50. **Community Facilities:** The target was to have 33% of the land allocations with permission by the revision 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 partly implemented. The future of the allocations will be reconsidered as part of the Local Development Plan Revision. The improvements allowed through an allocation would be achievable under Policy 48 Community Facilities and Infrastructure Requirements without the need for a further land allocation.

51. **Road & Cycle Schemes:** 7 Schemes are allocated in Table 10 of the Local Development Plan. 2 schemes have been completed and can be taken out of the Plan at Revision stage (RI2 and RI7). 3 schemes require discussion with Pembrokeshire County Council as part of the Local Development Plan Revision as future intentions appear to be changing (RI1, RI3, and RI4). Work is being planned on the remaining 2 schemes (RI5 and RI6).

Key to Table 14

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 14 Allocations that include housing

	Location Proposals Map ID	Site Name and Location	Total number of Units¹²
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
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 15, 16 and 17

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

¹² Reflects number of units granted planning permission (where a site has been granted planning permission as at April 2015). (Table taken from the Pembrokeshire Coast National Park Annual Monitoring Report 2015)

Table 15 Allocations of Employment/Mixed Use Sites (not included in Table 14)

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 through Local Development Plan Review.
St David's MA746	Between Glasfryn Road and Millard Park, St Davids	Mixed (Live/Work Units)	Not implemented.

Table 16 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. Pembrokeshire County Council advises that the cost of the work escalated beyond the allotted budget and other sources of funding have not been identified to date in order to complete the work.

Table 17 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.

How this impacts on the Plan Strategy

52. A revision of the housing land/employment/mixed use allocations identified in the Local Development Plan will be undertaken. A full revision of the Local Development Plan is necessary because the Authority will need to review the housing land supply to ensure that the supply is sufficient to meet the new Plan timescale (2031), that there are no fundamental impediments to the development of the sites allocated in the Plan, and to be able to specify the timescales within which constraints can be overcome. This will necessitate reviewing housing provision figures, preparing a Candidate Site Register and reviewing affordable housing requirements. This has potential implications for many Centres identified in the National Park and therefore a full rather than partial revision is needed.

53. The allocation for community facilities at Saundersfoot Railway Station will also be revised as part of the Local Development Plan revision. The highway and cycle schemes listed in Table 10 of the Local Development Plan also require revision and updating for the Plan period to 2031. (See [Sustainable Transport Background Paper](#))

These changes are necessary in order to address the following Soundness Tests	
3	<i>Can the sites allocated be delivered?</i>

Phasing of housing allocations

54. Phasing of housing and mixed use sites is included in the Local Development Plan (see paragraph 4.209, Table 8 and Appendix 2 of the Local Development Plan. This was done primarily to take account of the need to improve infrastructure or to assist in the absorption of development into Centres.

55. Continuing to include a phasing constraint is considered difficult to justify as the development industry will take account of programmed infrastructure improvements and how to provide supply to match demand when bringing sites forward. As a result it is proposed to review the phasing constraint contained in the Local Development Plan. See [Housing Background Paper](#).

How this impacts on the Plan Strategy

56. This in itself is unlikely to impact on the Plan strategy given the rate of development generally in Pembrokeshire.

These changes are necessary in order to address the following Soundness Tests	
2	<i>Can the rationale behind the policy be demonstrated?</i>
3	<i>Can the Plan be implemented?</i>

Sustainable Design Indicator

57. 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 when revised. ([Annual Monitoring Report 2012](#) refers).

How this impacts on the Plan Strategy

58. This in itself will not impact significantly on the Plan strategy.

These changes are necessary in order to address the following Soundness Tests	
1	<i>Does it have regard to national planning policy?</i>
3	<i>Can it be implemented?</i>

E Is the evidence on which the Local Development Plan based up to date?

59. An important consideration in determining whether the evidence is up to date is the fact that Local Development Plans are required to have an operational life once adopted of at least 10 years.¹³ It is important that the new need, due to the longer timescale, is identified and addressed. The current Local Development Plan runs until 2021 and a new end date is therefore necessary to comply with national guidance (i.e. 2031).
60. The Authority has undertaken a review of the evidence to ensure that it is up to date wherever feasible. See [Background Paper Evidence Base](#). It is accompanied by a commentary on any time-sensitive issues and a commentary on how the Authority will seek to address this issue where and when it arises.
61. In summary:
- There are elements of evidence that will continue to be provided and updated (for example national planning policy) as the Plan progresses and these issues will need to be addressed at the time they arise. Details are provided in the above Background Paper.
 - There is further evidence required that the Authority will need to provide, namely:
 - i. Affordable Housing Delivery Report (Housing Market Area figures) to be prepared prior to Preferred Strategy consultation stage. This will identify affordable housing requirements for sub areas of the Plan.
 - ii. Alternative Options Paper. This will explore options for change and will be first published alongside the Preferred Strategy.
 - iii. Candidate Site Background Paper & Register to be published prior to the Preferred Strategy Stage. This will provide the selection criteria for sites and an opportunity to submit sites.
 - iv. Employment Land Survey (Pembrokeshire) prior to publishing the Preferred Strategy. To assist in considering policy options for employment.
 - v. Land Allocation Implementation Study (update) – including affordable housing viability tests. Needed to advise on

¹³ Page 120 Local Development Plan Manual Edition 2 August 2015

deliverability of sites allocated in the Plan. To be published alongside the Deposit Local Development Plan.

- vi. Open Space Assessment 2015. This assessment will advise on the adequacy of existing supply. To be published alongside the Local Development Plan's Preferred Strategy.
- vii. Pembrokeshire Coast National Park Settlement Study 2007 - Update for new Rural Centres. Publish alongside the Local Development Plan's Preferred Strategy.
- viii. Regional Retail Study. To be published alongside the Local Development Plan's Preferred Strategy. The Study will advise on the any requirements to update the Plan's retail policy framework.

62. Generally as the Plan progresses new information will mean updates are likely to occur and any implications for Plan revision will need to be addressed.

63. Not all components of the evidence base are out of date. Whilst full revision will look at the Local Development Plan afresh, the National Park Authority considers that some of its original evidence remains sound.

64. **Rural Centres (Tier 4) Policy 6 (Strategy Policy):** In anticipation of Local Development Plan revision, the population (2011 Census estimate), the facilities available¹⁴, accessibility¹⁵, water supply and sewerage availability for towns and villages around the National Park have been checked. The update will mean that new Inset Maps for Centres will be added. Policy 6 will require revision to add new Centres. (See [Scale and Location of Growth Background Paper](#))

65. This will necessitate an updating of Policy 6 to include/delete these Centres, and the Proposals Map to include and delete Inset Plans at Deposit Stage.

66. Please see [Scale and Location of Growth Background Paper](#).

These changes are necessary in order to address the following Soundness Tests	
2	<i>Is the Plan supported by robust and credible evidence?</i>

67. **Targets for Renewable Energy:** The targets for the renewable electricity generation and renewable heat generation for Policy 33 Renewable

¹⁴ which have at least 3 facilities normally found in a small village (Letter box, sports ground, primary school, pub, community hall, place of worship, convenience shop, post office) or if less than this, at least 1 convenience shop

¹⁵ This relates the extent to which a locality or facility is readily approachable and usable by as many people as possible, including individuals with disabilities.

Energy (Strategy Policy) as set out in the Policy’s reasoned justification and in Appendix 4 of the Local Development Plan 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).

68. To inform the Local Development Plan Revision and to enable the continued monitoring of policy performance, an update to the study was required to review the uptake of certain technologies, identify technologies where limited further capacity exists, and identify new technologies and to provide a new set of predicted contributions for the revised plan new end date (2031). (Chapter 2 E Climate change, sustainable design, flooding, sustainable energy of the [2015 Annual Monitoring Report](#) and the [Climate Change Background Paper](#) refers.) Please also see [‘Update to the Development of a Renewable Energy Assessment and Target Information for the Pembrokeshire Coast Local Development Plan \(2008\)’ January 2016.](#)

These changes are necessary in order to address the following Soundness Tests	
1	<i>Does the Plan have regard to national policy?</i>
2	<p><i>Does it address key issues?</i></p> <p><i>Is it supported by robust, proportionate and credible evidence?</i></p> <p><i>Can the rationale behind the plan policies be demonstrated?</i></p> <p><i>Does it seek to meet assessed needs and contribute to the achievement of sustainable development?</i></p>

69. **Targets for Affordable Housing Delivery:** It is intended that the methodology for [the Affordable Housing Delivery Project Report](#) prepared in 2014 will be used to provide proposed percentage requirements for housing market areas and Centres at Local Development Plan Preferred Strategy stage and to assess the housing allocations proposed at Local Development Plan Deposit Plan stage. See [Housing Background Paper](#).

70. **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 prepared in the 1970's. Part of the rationale for this approach was the potential impact on the National Park landscape and also 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 was commissioned to assess the capacity of the National Park landscape to absorb additional chalet, caravan and camping sites and pitches. The outcome of the Assessment ([the Caravan, Camping and Chalet Landscape Capacity Assessment](#)), which is published with this Review Report, will be used as a basis for engagement to inform the revision of relevant policies of the Plan and what changes need to be made. (Chapter 2d of the 2015 Monitoring Report refers)

These changes are necessary in order to address the following Soundness Tests	
2	<p><i>Does it address key issues?</i></p> <p><i>Is it supported by robust, proportionate and credible evidence?</i></p> <p><i>Can the rationale behind the plan policies be demonstrated?</i></p> <p><i>Does it seek to meet assessed needs and contribute to the achievement of sustainable development?</i></p>

F What contextual changes have there been since the adoption of the Plan?

71. Below are identified those contextual changes that will or may have the potential to significantly influence the revision process.

Neighbouring Local Development Plans

72. All neighbouring Plans were adopted after this National Park's Local Development Plan. One of the tests of soundness deals with whether a plan is compatible with that of neighbouring authorities.

Planning Authority	LDP Adoption Date	1 st Review commencement dates
Pembrokeshire County Council	February 2013	February 2017
Ceredigion County Council	April 2013	April 2017
Carmarthenshire County Council	December 2014	December 2018

73. Each neighbouring authority provided their own commentary on compatibility with this National Park's Local Development Plan to meet their tests of soundness tests.

74. The evidence base for the Pembrokeshire Coast National Park Local Development Plan has been reviewed. The Authority has also liaised with neighbouring authorities on this.

75. Any resultant areas that require change are listed in the Review Report.

These changes are necessary in order to address the following Soundness Tests	
2	<i>Is the Plan compatible with neighbouring authorities?</i>

76. Welsh Government has requested that the review discuss the potential for preparing a joint plan with Pembrokeshire County Council. The functional linkages and interdependencies of the communities in the National Park area and in the Council's planning area need to be summarised and concluded.

77. The two Authorities worked closely to prepare joint evidence, as appropriate, including joint work on Statements of Common Ground at Pembrokeshire Coast National Park Local Development Plan Deposit and on Submission, to demonstrate the compatibility between the Pembrokeshire Coast National Park Local Development Plan and the

emerging policies then taking shape for the County Council's Local Development Plan.

78. Discussions have taken place on the way forward for the Pembrokeshire Coast National Park Local Development Plan Review, taking into account the following:

- The Council's Local Development Plan is at a much earlier stage of implementation and through its Annual Monitoring Reports for 2013-14 and 2014-15 has demonstrated effective Plan implementation, with formal / full Plan review not required until 2017;
- The greater costs and longer time-scales of producing a Joint Plan Review, given the need to re-examine all elements of the evidence base;
- The need for the Pembrokeshire Coast National Park Authority to progress quickly with its statutorily required Plan Review, particularly in the context of not being able to demonstrate a five year land supply;
- The swifter progress that a National Park Authority can make with Plan preparation, given its starting point in National Park statutory purposes, in combination with its significantly smaller area (29%) and population base (c20%) and the generally smaller scale of consultation responses than would be the case for the Council's Local Development Plan;
- The mutual benefits (including potential cost savings) of collaboration on joint updates to the evidence base, where appropriate;
- The rationale for policy variation stemming from strategic growth / restraint objectives and the need to reflect National Park purposes;
- The need for Statements of Common Ground to demonstrate cross boundary consistency and compatibility;
- The Review of Designated Landscapes (report 2015)
- The uncertainties associated regarding Local Government Reorganisation, possibly resulting in pressure to prepare composite Local Development Plans for newly formed authorities as soon as possible after reorganisation.

79. Any move to joint plan preparation would require a fundamental reassessment of both strategies, with considerably more work and supporting evidence required than is otherwise anticipated for individual Plan review. For the Council, an early and unnecessary review of the Plan would incur considerable unnecessary additional cost (additional staff resource) and at the same time would result in unhelpful uncertainty for decision making on planning applications during plan preparation, with

the prospect of facing a further early review on Local Government Reorganisation.

80. Given this background, the two Authorities will continue further joint working on an evidence base to support implementation and review of both Authorities Plans.

National Law, Policy and other Local Development Plans

Review of Designated Landscapes

81. On the 29 September 2014 the Minister for Natural Resources commissioned an Independent Panel to conduct a review of designated landscapes in Wales.
82. The review started at the end of 2014 and was conducted in 2 stages. The review panel was chaired by Professor Terry Marsden of Cardiff University with John Lloyd Jones and Dr Ruth Williams as members.
83. The Independent Review of Designated Landscapes in Wales makes 69 recommendations covering a raft of proposals and observations on purposes, principles, vision, governance models, planning, and funding.
84. The recommendations include:
- i. making no change to the name or legal status of national parks or Areas of Outstanding Natural Beauty (AONBs)
 - ii. There should be three interlocking statutory purposes for both the National Parks and AONBs in relations to conservation, physical and mental well-being and sustainable forms of economic and community development.
 - iii. strengthening the support and delivery role of other bodies
 - iv. the creation of a National Landscape Committee.
85. Due to the considerable scale and scope of the recommendations, further work is now needed to understand their potential benefit and their consequences.
86. Lord Dafydd Ellis-Thomas AM will lead a Future Landscapes Working Group, involving representatives of the national parks, Areas of Outstanding Natural Beauty, interest groups, business, and local government to participate.
87. The group will explore these recommendations and report their findings in 2016.
88. Implications arising for preparing the replacement Local Development Plan will be monitored and addressed when required.

Household Growth

89. Welsh Government advises that local planning authorities will need to have a clear understanding of the factors influencing housing requirements in their

area over the Plan period. The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment, will form part of the Plan's evidence base

Site Selection

90. The approach to site selection which will be used to assess candidate sites will require revision against changes to paragraph 9.2.9 of Planning Policy Wales Edition 8 January 2016 and the advice contained in the Local Development Plan Manual Edition 2 August 2015. The Authority will need to review the housing land supply to ensure that the supply is sufficient to meet the new Plan timescale (2031), and to ensure that there are no fundamental impediments to the development of the sites allocated in the Plan and to be able to specify the timescales within which constraints can be overcome.
91. The approach to site selection will be published prior to Local Development Plan Preferred Strategy consultation to provide guidance to those submitting candidate sites.

Countryside Policy 7a (infill and rounding off) and 7d (conversion)

92. The introduction of allowing local needs proposals in places that may not be accessible other than by private car means that an update is needed for Policy 7a) and d) of the Plan. The policy does not allow either infill or rounding off or conversion of buildings in inaccessible locations where it is for 'local need'. The local need definition in the adopted Plan at present is for affordable housing. These criteria require revision in relation to Technical Advice Note 6 July 2010, paragraph 2.2.3.

Countryside Policy 7d (conversion)

93. Technical Advice Note 23, February 2014 paragraph 3.2.1 refers to the important role the re-use and adaptation of existing rural buildings play in meeting the needs of rural areas. The Technical Advice Note refers to addressing traffic impact issues in relation to the scale of activity proposed and overcoming planning permission objections on traffic grounds. Policy 7d) which deals with the conversion of appropriate buildings requires revision in relation to this issue as the Plan's approach seeks to restrict uses dependent on their accessibility by public transport as part of the Plan's spatial strategy.

Farm Diversification

94. Planning Policy Wales 8th Edition January 2016 paragraph 7.5.1 (penultimate bullet) advises of the need to include policies on farm diversification. The adopted Local Development Plan relied on national planning policy. A new policy on farm diversification will be inserted in

the replacement Plan. See [Employment Background Paper](#). The Plan's key issue for development in the countryside (page 11), its vision paragraph 3.4 objective on page 16, key outcomes (page 16), National Park in 2021 for the Countryside (paragraph 4.44) remain valid. Policy 7c) Countryside and Policy 42b) Employment Sites/Live Work Units will include a cross reference to the new policy. Paragraph 4.53 of the Local Development Plan will be revised in light of the need to include a new policy.

Waste

95. 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 revision stage and taken account of in the interim. (Chapter 2B of the 2014 Monitoring Report refers and the [Waste Background Paper](#)) This will primarily mean revising reference to serving only the National Park area to acknowledge the national policy context whereby it would be expected that facilities should predominantly serve the National Park area ([Waste Background Paper](#) refers).

Employment

96. Taking account of recent national planning policy changes a review of the Local Development Plan evidence base will need to be undertaken. The existing evidence base was prepared in full consultation with a variety of stakeholders but in particular Pembrokeshire County Council which provides an 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. Pembrokeshire County Council and the National Park Authority are currently preparing a Pembrokeshire Employment Land Survey which will be published and taken into account prior to publishing the Local Development Plan Preferred Strategy. It is anticipated that output from a more regional strategic collaboration between authorities will be longer term (regional evidence base and regional strategy). (Chapter 2D of the [2014 Monitoring report](#) refers.)

Policy 42 Employment Sites & Live/Work Units criterion b)

97. This requires revision. The revised Chapter 7 of Planning Policy Wales Edition 8 January 2016 and Technical Advice Note 23 February 2014 provides for:

- A sequential approach to employment site selection (first preference to within the boundaries of settlements, second preference edge of settlement and third preference sites in the countryside.) Paragraph 1.2.7 of Technical Advice Note 23 Economic Development (February 2014) applies.
- In making the selection the planning authority should consider jobs, accommodated alternatives available and special merit (Section 2.1 of Technical Advice Note 23 provides a detailed commentary).
- In rural areas there are potentially two additional special contributions; the alignment of jobs and housing and the needs of expanding businesses or those new businesses needing to join an existing cluster. (paragraph 3.13 of Technical Advice Note 23).

98. Chapter 2D of the [2014 Monitoring Report](#) and the [Background Paper on Employment](#) refers.

Contingency

99. A 10% level of contingency provision is generally accepted as providing a reasonable element of flexibility in development plans when tested in current Examinations. Inspectors also take into account the circumstances of individual Plan areas, and Brecon Beacons National Park Inspector's report refers to accepting a lower percentage in view of the possibility that the sites in the Plan may not deliver as anticipated and the impact of allocating additional land in the sensitive landscape of the National Park. The implications of updating the housing provision for the Plan are described in detail earlier in this Report.

These changes are necessary in order to address the following Soundness Tests	
	<i>Is the Plan sufficiently flexible? Are there appropriate contingency provisions?</i>

Constraint Mapping

100. The Local Development Plan Manual (Edition 2 August 2015, page 16) advises that where spatial delineations are determined by mechanisms other than the Local Development Plan they do not need to be shown on the Proposals Map - in these situations the use of a Constraints Map may be beneficial. A Constraints Map can show, for example, spatial delineations determined by TAN15 Development Advice Maps or statutory landscape designations. This may be beneficial in that the map can be amended readily to take account of changes that are not determined by the Local Development Plan. A Constraints Map, unlike the Proposals Map, is not a statutory requirement and is not part of the

Local Development Plan. If produced, then its status must be made clear; the Local Development Plan should reference it and list the designations it includes. A Constraints Map will be prepared alongside the replacement Local Development Plan.

Scrutiny Report on Economic Activity

101. A report by the Joint Scrutiny Committee on the impact of the policies and work of the National Park Authorities on 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 revision. Chapter 2D of this Monitoring Report refers, as does the [Employment Background Paper](#). The relevant recommendations relate to flexibility and monitoring (both tests of soundness for a Plan) and liaison with the economic development authority. The [Employment Background Paper refers](#).

These changes are necessary in order to address the following Soundness Tests	
2	<i>Does the Plan address key issues?</i>
3	<i>Is the Plan sufficiently flexible? Are there appropriate contingency provisions?</i> <i>Is it monitored effectively?</i>

Accessibility in the Countryside

102. **Policy 7a (infill and rounding off) and Policy 7d (conversion) (Strategy Policy):** The spatial strategy of 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 is limited to conversion of appropriate buildings or infill and rounding off in groups of buildings. The ability of 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 and planning applications are being decided contrary to recommendation. This issue will be considered as part of the Local Development Plan revision. (Chapter 2 of the 2015 Monitoring Report refers.)

These changes are necessary in order to address the following Soundness Tests	
	<i>Does the Plan address key issues?</i>

Newgale Adaptation Plan

103. Newgale is defined as a Centre in the Local Development Plan with a Centre boundary. Parts of the village close to the shoreline and within the Centre boundary are within a C2 flood zone. A study prepared for Pembrokeshire County Council has highlighted that the current coastal defences have a limited lifespan with consequential effects on the village and main road running along the coast. The advice in Technical Advice Note 15: Flooding will be relevant when considering any proposals within the flood zone area. Vulnerable uses such as housing will not be permitted within the flood zone.
104. The work to assess the need for and establish a route for a new road link at Newgale currently has no timescale. Pembrokeshire County Council are progressing the work using the Welsh Government's approved guidance (WelTAG). It is unlikely that a definitive route will be identified during the Local Development Plan Revision period and so this will need to be considered again in future reviews of the Plan.
105. The replacement Local Development Plan will need to highlight and monitor the issues that are emerging for Newgale.

G Sustainability Appraisal and Habitats Regulations Assessment

106. As the Plan will be a replacement Plan each stage of Sustainability Appraisal and Habitats Regulations Assessment preparation will be carried out.
107. The four Annual Monitoring Reports have identified specific issues that require consideration when preparing the replacement Local Development Plan. The [2015 Annual Monitoring Report](#) advises that within the scope of Local Development Plan and its associated supplementary planning guidance documents it is generally contributing positively to 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. These issues are;
- Changes in approach to development in the countryside Policy 7a Countryside (infill and rounding off) and Policy 7d (conversion).

- Reducing the opportunities to achieve a more sustainable design in the main house when approving an extension to a building (Policy 29 Sustainable Design).
- Changes to national planning policy regarding sustainable design provide an opportunity to take a fresh look at indicators and targets under Policy 29 Sustainable Design.
- A roll forward of the Authority's Renewable Energy Assessment to 2031.
- The sustainability implications for policy change following preparation of the Caravan, Camping and Chalet Landscape Capacity Assessment.

H Next Steps

108. The Authority has informally¹⁶ consulted on the draft Review Report before it was finalised and approved at the National Park Authority meeting on 15 June 2016. The consultation has helped inform the scope of change required. The Review Report will also be consulted upon during the first public consultation on the revision of the Local Development Plan.¹⁷
109. The stages of Plan preparation are set out on the Authority's [website](#).
110. As the Plan will be a replacement Plan, it will, in its various forms, be open to consultation and comment as it progresses to adoption. The areas identified for change by the Authority will not be the only subjects of consultation.
111. Background Papers and evidence published alongside this Review Report help to identify areas of change. The Background Papers and evidence base used to prepare this report is on the Authority's [website](#). They will be updated and amended as needed as the replacement Plan progresses to adoption.
112. The Plan's revised Delivery Agreement includes the timetable for preparing a replacement Plan and methods of engagement to be used.
113. The Sustainability Appraisal Scoping Report has also been subject to formal consultation.
114. The Authority has completed these engagement exercises and approved these documents in June 2016. The Delivery Agreement was approved by Welsh Government on 25 July 2016.
115. The next stage will be to invite candidate sites submissions. The Authority will publish criteria for site selection and invite site submissions.

Stage	Main purpose
Review Report	<ul style="list-style-type: none"> Identifies the parts of the Local Development Plan that need to be revised. Publish background papers (evidence base) in support.
Delivery Agreement	<ul style="list-style-type: none"> Timetable for producing the replacement Local Development Plan. Community Involvement Scheme outlining the principles of community engagement.
Candidate Sites	<ul style="list-style-type: none"> Publish criteria for site selection. Invite site submissions.
Preferred Strategy	<ul style="list-style-type: none"> Set out the key strategic policies for the Local Development Plan Identify sites which fit with the Strategy
Deposit Plan	<ul style="list-style-type: none"> Prepare and publish the detailed policies and proposals

We are here →

¹⁶ This is not a statutory requirement but provides an opportunity for early input.

¹⁷ Regulation 15 Consultation Pre-Deposit Consultation on the Preferred Strategy.

	map.
Submission	<ul style="list-style-type: none"> • Submit the Plan and supporting evidence to the Planning Inspectorate.
Examination	<ul style="list-style-type: none"> • An independent Inspector assesses the soundness of the Plan.
Adoption	<ul style="list-style-type: none"> • The Authority adopts the Plan and uses it in making planning decisions.

The 2004 Act	The Planning and Compulsory Purchase Act 2004.
Annual Monitoring Report (AMR)	This will assess the extent to which policies in the local development plan are being successfully implemented (Regulation 37 of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005.
Baseline	A description of the present state of an area against which to measure change.
Biodiversity Action Plan	A plan that sets objectives and actions for the conservation of biodiversity, with measurable targets, whose aim is to conserve and enhance nature across communities by bringing together all interests by involving sectors such as agriculture and business as well as the communities themselves. Action is developed and taken forward in partnership and in doing so reflects local priorities as well as biodiversity needs.
Candidate Site	Candidate Sites are those nominated by anyone for consideration by the Local Planning Authority as allocations in an emerging Local Development Plan.
Candidate Sites Register	Register of candidate sites prepared following a call for candidate sites by the Local Planning Authority.
Community Infrastructure Levy (CIL)	The Community Infrastructure Levy is a planning charge, introduced by the Planning Act 2008 as a tool for local planning authorities to help deliver infrastructure to support the development of their area. It came into force on 6 April 2010 through the Community Infrastructure Levy Regulations 2010.
Community	People living in a defined geographical area, or who share other interests and therefore form communities of interest.
Community Involvement Scheme (CIS)	Sets out the project plan and policies of the Local Planning Authority for involving local communities, including businesses, in the preparation of local development plans. The Community Involvement Scheme is submitted to the Welsh Government as part of the Delivery Agreement for agreement.
Community Strategy	Required by the Local Government (Wales) Measure 2009 (Part 2: Sections 37-46) with the aim of improving the social, environmental and economic well being of their areas. See "Single Integrated Plan".
Consensus building	A process of early dialogue with targeted interest groups to understand relevant viewpoints and agree a course of action.
Consultation	A formal process in which comments are invited on a particular topic or set of topics, or a draft document.
Consultation Body	An authority with environmental responsibilities concerned by the effects of implementing plans and programmes and which must be consulted under the Strategic Environmental Assessment Regulations; i.e. Natural Resources Wales (NRW) and Cadw.
Consultation exercise	A single consultation project focused on a defined objective and usually part of an overall consultation programme.
Contextual Indicator	An indicator used to monitor changes in the context within which the plan is being implemented.
Delivery Agreement (DA)	A document comprising the Local Planning Authority's timetable for the preparation of the Local Development Plan together with its Community Involvement Scheme, submitted to the Welsh Government for agreement.
Deposit Documents	See "Local Development Plan (or Deposit) Documents".
Development management policies	A suite of criteria-based policies which will ensure that all development within the area meets the aims and objectives set out in the Strategy.
Dialogue methods	Different techniques of interaction that build a continuous dialogue between and among affected groups.

Engagement	A process which encourages substantive deliberation in a community. Proactive attempt to involve any given group of people/section of the community.
Environmental Report	Document required by the Strategic Environmental Assessment Regulations which identifies, describes and appraises the likely significant effects on the environment of implementing the plan, see Sustainability Appraisal Report.
Evidence Base	Interpretation of Baseline or other information/data to provide the basis for plan policy.
Focussed Change (FC)	Changes proposed to the deposit Local Development Plan prior to submission that are extremely limited in number, that reflect key pieces of evidence, but do not go to the heart of the plan.
Habitats Regulations Assessment (HRA)	The screening and appropriate assessment of options required under Part 6 Chapter 8 of the Conservation of Habitats and Species Regulations 2010 (as amended) (the Habitats Regulations) - a recognised iterative process which helps determine the likely significant effect on a plan or programme and (where appropriate) assess adverse impacts on the integrity of a European site. The assessment is required to be undertaken by a competent authority in respect of plans or projects which are likely to have a significant effect (alone and in combination with other plans and projects) on a "European site" (see paragraph 5.1.2 of Technical Advice Note 5), or as a matter of policy a proposed "European site" or Ramsar site, under the provisions of Article 6(3) of the EC Directive 92/43/ECC (the Habitats Directive), regulations 61 and 102 of the Conservation of Habitats and Species Regulations (as amended) 2010, and, regulation 25 of the Offshore Marine Conservation (Natural Habitats &c) Regulations 2007.
Indicator	A measure of variables over time, often used to measure achievement of objectives.
Initial SA Report	A term used in Local Development Plan Wales to refer to the Sustainability Appraisal Report, produced at the Preferred Strategy stage. This assesses the Local Development Plan options against the Sustainability Appraisal framework. The report is then expanded at the Deposit Local Development Plan stage and finalised alongside the Adoption Statement.
Involvement	Generic term to include both participation and consultation techniques.
LANDMAP	LANDMAP is the formally adopted methodology for landscape assessment in Wales; therefore all landscape work and assessments of the effects arising from a proposals impact on the landscape in Wales should include LANDMAP
Local Development Plan (LDP)	The required statutory development plan for each local planning authority area in Wales under Part 6 of the Planning and Compulsory Purchase Act 2004. A land use plan that is subject to independent examination, which will form the statutory development plan for a local planning authority area for the purposes of the Act. It should include a vision, strategy, area-wide policies for development types, land allocations, and where necessary policies and proposals for key areas of change and protection. Policies and allocations must be shown geographically on the Proposals Map forming part of the plan.
Local Development Plan (or Deposit) Documents	These include the deposit Local Development Plan, the Sustainability Appraisal report, the initial consultation report, the candidate sites register, the Review Report (if appropriate), any relevant supporting documents.
Local Planning Authority (LPA)	A planning authority responsible for the preparation of a Local Development Plan; i.e. County or Borough Council, or National Park Authority.
Local strategy	Partnerships of stakeholders who bring together service providers,

partnership	private, community and voluntary sectors to identify and meet local needs more effectively and in a joined up way; usually engaged in producing and to produce the Single Integrated Plan.
Local Well-being Plan	Under The Well-being of Future Generations (Wales) Act 2015 Public Service Boards will be established for each local authority area; it is intended that each will prepare a Well-being Plan to replace the Single Integrated Plan by April 2018 (s.39).
Matters Arising Change (MAC)	Change after submission of a Local Development Plan, where the appointed Inspector concludes the change is necessary for soundness having considered all the evidence submitted to the examination.
Marine Plan	The Welsh National Marine Plan prepared under the Marine and Coastal Access Act 2009.
Mitigation	Measures to avoid, reduce or offset significant adverse effects
Mitigation	Measures to avoid, reduce or offset significant adverse effects.
National Park Management Plan (NPMP)	In national park areas the National Park Management Plan is the strategic over-arching policy document, co-ordinating and integrating other plans, strategies and actions where these affect the Park purposes and duties; it should inform the Local Development Plan. It is important that the Single Integrated Plan(s) dovetail(s) with the National Park Management Plan.
Objective	A statement of what is intended, specifying the desired direction of change in trends.
Output Indicator	An indicator that measures the direct output of the plan. These indicators measure progress in achieving the plan's objectives, targets and policies.
Participation	A process whereby stakeholders and the community can interface with plan makers.
Partners	Other local/National Park authority departments and statutory bodies where the Local Development Plan will help to deliver some of the objectives of their strategies. Partners may be expected to contribute to formulating relevant parts of the Local Development Plan.
Pre-deposit proposals documents	These include the vision, strategic options, preferred strategy, key policies, the Sustainability Appraisal report, the candidate sites register, Review Report (if appropriate).
Pre-deposit stage	The participation and consultation stages prior to deposit; the Manual refers to the Strategic Options and Preferred Strategy stage which relate to the full plan procedure; reduced requirements relate to the short form plan revision procedure.
Review Report	The required statutory report under S69 of the 2004 Act and/or Reg41; to conclude on the Local Development Plan revision procedure to be followed based on a clear assessment of what has been considered and what needs to change and why, based on evidence.
Scoping SA	The process of deciding the scope and level of detail of an Sustainability Appraisal, including the sustainability effects and options which need to be considered, the assessment methods to be used, and the structure and contents of the Sustainability Appraisal Report.
Service Level Agreement (SLA)	An agreement with a statutory agency which sets the standards which it will aim to meet, and the costs arising. The Planning Inspectorate agrees one with the Local Planning Authority in respect of an Local Development Plan examination, setting out the likely timescales and cost of the examination and providing the Local Planning Authority with clear guidance on the nature of their own responsibilities.
Short form revision procedure	May be appropriate for circumstances where the issues involved are not of sufficient significance to justify undertaking the full plan revision procedure.
Single Integrated Plan (SIP)	Discharges statutory duties identified by Welsh Government ("Shared Purpose – Shared Delivery", WG 2012), including Community Strategies; prepared by a Local Service Board. See "Local Well-being Plans" which are to replace SIPs".

Significant effect	Effects which are significant in the context of the plan (Schedule 1 of the SEA Regulations gives criteria for determining the likely significance of effects on the environment).
Significant Effects Indicator	An indicator that measures the significant effects of the plan.
Site specific allocations	Allocations of sites (proposals) for specific or mixed uses or development contained in a local development plan. Policies will identify any specific requirements for individual proposals. Allocations will be shown on the Local Development Plan's proposals map.
Soundness	In order to be adopted, a Local Development Plan must be determined 'sound' by the examination Inspector (S64 of the 2004 Act). Tests of soundness tests and checks are identified in PPW (ch2) and the Manual (ch8).
Stakeholders	Interests directly affected by the Local Development Plan (and/or SEA) - involvement generally through representative bodies.
Statement of Common Ground (SocG)	The purpose of a Statement Of Common Ground is to establish the main areas of agreement between two or more parties on a particular issue.
Strategic Environmental Assessment (SEA)	Generic term used internationally to describe environmental assessment as applied to plans and programmes. Strategic Environmental Appraisal process is derived from European legislation and defined at European level – Directive 2001/42/EC. The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 (SEA Regulations) require a formal "environmental assessment of certain plans and programmes, including those in the field of planning and land use".
Supplementary Planning Guidance (SPG)	Supplementary information in respect of the policies in an Local Development Plan. Supplementary Planning Guidance does not form part of the development plan and is not subject to independent examination but must be consistent with it and with national planning policy.
Sustainability Appraisal (SA)	Tool for appraising policies to ensure they reflect sustainable development objectives (i.e. social, environmental and economic factors). Each Local Planning Authority is required by S62(6) of the 2004 Act to undertake Sustainability Appraisal of the Local Development Plan. This form of Sustainability Appraisal fully incorporates the requirements of the Strategic Environmental Appraisal Regulations. The term is used in this Manual to include Strategic Environmental Assessment, unless otherwise made clear.
Sustainability Appraisal Framework	This comprises the identified Sustainability Appraisal objectives against which Local Development Plan options are then assessed.
Sustainability Appraisal Report (SA Report)	A document required to be produced as part of the Sustainability Appraisal process to describe and appraise the likely significant effects on sustainability of implementing the Local Development Plan, which also meets the requirement for the Environmental Report under the Strategic Environmental Appraisal Regulations. S62(6) of the 2004 Act requires each Local Planning Authority to prepare a report of the findings of the Sustainability Appraisal of the Local Development Plan. - The Sustainability Appraisal Report is first produced at the Preferred Strategy stage (the Interim Sustainability Appraisal Report), expanded at the Deposit Local Development Plan stage and finalised alongside the Adoption Statement.
Wales Spatial Plan (WSP)	A plan prepared and approved by the National Assembly for Wales under S60 of the 2004 Act, which sets out a strategic framework to guide future development and policy interventions, whether or not these relate to formal land use planning control. Under S62(5)(b) of the 2004 Act a local planning authority must have regard to the Wales Spatial Plan in preparing an Local Development Plan.

