

**Pembrokeshire Coast National Park  
Authority**

**Annual Monitoring Report**

for the Local Development Plan

**National Park Authority**

**2012**

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## 1. Key Findings

- 1.1. This Annual Monitoring Report assesses the effects of the Local Development Plan against those which were anticipated. As the Plan is newly adopted the effects of the Plan can only be limited in nature. This report is for the financial year April 2011 to end of March 2012.
- 1.2. Below are the key findings from this second monitoring report in terms of significant contextual issues for future monitoring/action and selected policies performance.
- 1.3. The main conclusion is that there has not been a significant change which would warrant a review of the Plan at this time.<sup>1</sup>

## Context

1.4. In terms of contextual issues:

- a) A new Policy Statement for the National Parks and National Park Authorities in Wales is proposed by the Welsh Government. – consider for the 2013 Monitoring Report.
- b) The enactment of legislation in the Welsh Government's five year legislative programme will need to be considered when in place. any implications for Plan review will need to be identified.
- c) Consider outcomes from the Welsh Government review of Technical Advice Note 20 Welsh Language. This is due for publication in the Summer of 2012.
- d) Safeguarding of Minerals – Guidance and maps for planning authorities are expected to be published by the Welsh Government in September 2012.
- e) National Inshore/Offshore Plans will need to be taken account of when prepared by the Welsh Government.
- f) Building Regulations changes in Wales – await finalisation. Will any National and Local Planning policies on sustainable design be required as a result?
- g) Onshore Infrastructural Requirements for likely off-shore development – study by Halcrow. The study has been submitted to Welsh Government. Consider the implications of the study when published.
- h) Planning for Sustainable Economic Renewal outcomes – await Welsh Government guidance.
- i) Rural enterprise dwellings – A technical update of policy is needed at formal review stage.
- j) One Planet Developments Welsh Government Guidance to be published October 2012 – this will feed into a review of supplementary planning guidance and a technical update of policy at formal review stage.
- k) The Welsh Local Government Association is currently leading on a review of the approach taken in Wales to S106 drafting to ensure that owners of affordable housing delivered in Wales can find a mortgage. The outcome is anticipated. This is likely to mean a review of the approach to occupancy controls set out in the Authority's adopted supplementary planning guidance.



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<sup>1</sup> *Local Development Plan Manual, page 111, Section 9.6.*  
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- l) Await the outcome of the Welsh Government Enterprise and Business Committee Inquiry into the regeneration of town centres.


## Policies

1.5. The table below provides a visual aid of the effectiveness of policies using the 32 indicators analysed in the Monitoring Report.

| Target  | Number of Indicators |   |
|---|----------------------|---|
| Targets / objectives are being achieved.  | 26                   |  |
| Targets have not been achieved or poor performance, but no concerns over implementation of policy / objectives - see below for a summary of the issues.   | 5                    |  |
| <p><b>Housing Land Availability - Welsh Government Indicator (Indicator 21)</b></p> <p>The Authority is required to demonstrate a five year effectively available housing land supply. The 2011 study concludes that the National Park has a 3.8 year land supply. In order to address this shortfall the National Park Authority is carrying out several actions including approvals of planning applications, investigating the issues surrounding delivering sites, meeting with housing associations. The outcomes of these actions will require consideration in future studies and the next Local Development Plan monitoring report.</p>   |                      |   |
| <p><b>Affordable housing delivery and general market housing completions – Welsh Government Indicator (Indicator 22)</b></p> <p>The annual average completion rate has been in decline in recent years. The overall target to build 1000 general market dwellings in the Plan period, at current rates of completion would not be possible. This is expected to change over the Plan period and reflects the current recession.</p> <p>Affordable housing delivery is consequently down as well. A total of 44 affordable dwellings were completed or under construction in the period 2007 to 2012 whereas a figure of 140 was anticipated. There is currently planning permission granted for a further 35 affordable dwellings. Affordable housing delivery is currently the subject of a Scrutiny Committee Review by the National Park Authority. The outcomes of this work and other actions identified in the Monitoring Report should assist with improving delivery.</p> |                      |   |
| <p><b>Renewable Heat Target – Local Development Plan Indicator (Indicator 12b)</b></p> <p>The Plan is behind on heat generation targets. This is likely to be due mainly 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.</p>   |                      |   |
| <p><b>Prioritising reusing employment land for community uses or affordable housing - Local Development Plan Indicator (Indicator 3b)</b></p> <p>The <u>temporary</u> loss of one employment site was approved during the monitoring period (between 1st April 2011 and 31st March 2012). The approval consisted of the change of use of an employment site that had not been in use for some time to a public car park, permission was granted for three years only. It was recognised that this change of use is contrary to</p>  |                      |   |

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|   |                      |   |
|---|----------------------|---|
| <p>Local Development Plan policy and that a permanent change of use is inappropriate.</p> <p>This does not show an undermining of Local Development Plan policy as the approval was temporary to allow the site to be brought back into economic use in the future.</p>   |                      |   |
| <p><b>Loss of Greenfield land – Welsh Government Indicator (Indicator 28)</b></p> <p>The issue here was the approval of one dwelling in the countryside which was approved contrary to Officer recommendation. Members felt that permission should be granted as the plot, in their opinion, was not considered to be in the open countryside as the land was not agricultural land and it was currently used as recreational space with a garage. The application approved contrary to Officer recommendation was referred to the Welsh Government but it was concluded that they would not call in the application for determination as it was a local matter. Given this outcome it is concluded that the indicator continues to be monitored and that no further action is possible at this time.</p>   |                      |   |
| Target  | Number of Indicators |   |
| Monitoring indicates area of concern over implementation of policy / objectives.  | 1                    |  |
| <p>Supplementary Planning Guidance on sustainable design and building extensions was adopted in June 2011 in support of Policy 29 Sustainable Design. The building extensions guidance required energy, water and drainage efficiency improvements to be sought in the original building as well as the extension where appropriate and practicable. A condition would then be placed on the approval to ensure the improvements are carried out in accordance with the details of the application. However it has become apparent that this policy approach is ineffective in promoting energy efficiency in existing buildings. Where this approach has come before an Inspector (3 separate appeals), it has been challenged as being unduly onerous, failing to meet the 6 tests of planning conditions under Circular 35/95 The Use of Conditions in Planning Permissions and relating to building elements which do not require planning permission. In light of these appeal decisions, the Authority has sought guidance from Inspectorate, in addition to separate legal advice. A possible alternative approach, to be more in line with primary legislation and national planning policy, would be to only require improvements in the existing building when achieving an acceptable energy efficiency level for the extension is dependent upon doing so. However, significant practical difficulties in deciphering when this would be the case and what level of improvements would be required exist. It is also considered that this approach would not apply to the vast majority of applications for extensions. This, coupled with advances in Building Regulations, has led to the development management implementation of this aspect of the Policy no longer being applied and the accompanying supplementary planning guidance being withdrawn as of the 1st September 2012.</p> |                      |   |

## Planning Improvement Fund 2012-13 Requirements

1.6. Highlighted is the requirement to identify policies that are not being implemented and for each such policy, identify:

- Reasons why the policy is not being implemented
- Steps that can be taken to enable the policy to be implemented
- Whether a revision to the plan is required

1.7. In terms of issues of implementation there are 56 policies in the Plan. 36 have been referred to during the monitoring period in planning applications considered. 20 have not been engaged.

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These include some strategy policies which cross refer to more detailed policies of the Plan that have been applied. Some are in place to deal with specific issues such as minerals and waste and would not be used regularly in any case. Monitoring of usage until the review period will provide a better time frame for considering the need for policies.

1.8. Appendix 2 refers to progress on specific land allocations. Of the 10 allocations in the Plan for employment and mixed uses 4 have applications approved on them and 1 has been the subject of preapplication discussions. Of the 24 housing allocations proposed 4 have had preapplication discussions with 2 the subject of planning permissions. On the 2 community facility allocations there have been preapplication discussions on 1 site. Of the 7 road and cycle schemes 1 has been completed and 3 are actively under investigation. Actions in relation to improving on the delivery of sites are set out under Indicators 21 and 22 in Chapter 2E.

1.9. Specific issues regarding implementation and dealt with throughout the Monitoring Report.

1.10. Annual Monitoring Reports should also:

- Specify the housing land supply from the current Housing Land Availability Report for that year, and for the full period since adoption of the plan.
- Specify the number of net additional affordable and general market dwellings built in the area for that year, and the full period since the adoption of the Plan.

1.11. Please see Indicators 21 and 22 in Chapter 2E for this information.

## **Sustainability Appraisal**

1.12. An analysis of how the Plan is contributing to the sustainability appraisal can be found in Chapter 3. No substantial issues of concern are identified.

## **Consultation and Further Information**

1.13. The Monitoring Report is made available to relevant statutory bodies, stakeholders and individuals and is published on the Authority's web site. Comments on the 2012 document are invited and will inform the production of the next report in 2013. Any comments and queries relating to this Monitoring Report should be addressed to:

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## Consultation on the 2011 Monitoring Report

- 1.14. The 2011 Monitoring Report was made available for comment to relevant statutory bodies, stakeholders and individuals and was published on the Authority's web site. Comments on the 2011 document were reported to the National Park Authority on the 28<sup>th</sup> September 2012. No review of the Local Development Plan is required in response.<sup>2</sup>

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<sup>2</sup> <http://www.pembrokeshirecoast.org.uk/default.asp?PID=411>  
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## 2. Strategy – Where we want to be – Are we getting there?

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

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

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

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

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

|  |          |
|--|----------|
| <b>Source of Indicator</b>               |          |
| Local Development Plan                   |          |
| Local Development Plan Manual            |          |
| Welsh Assembly Government Core Indicator | <b>W</b> |



## National Park Purposes and Duty and the Spatial Strategy

### Key Outcomes

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

### Context

2.4 **National Park Policy Statement:** A revised National Park Policy Statement is expected to be published by the Welsh Government.


2.5 **Accessibility:** Regarding the spatial strategy the Local Development Plan has largely directed new development to identified Centres where there are a range of facilities and services available. In some locations – namely Dale, Marloes, Herbrandston and St Ishmaels, there is potential for development to help deliver affordable housing for which there is considerable need within these communities.

2.6 Public transport is limited in the area in which all of these villages are located and the County Council has been approached to examine the potential for providing additional services with the increased customer base through the development of the housing sites allocated in these villages. Unfortunately, in the current economic climate the provision of new services is not possible, and there are likely to be reductions in existing services during 2012 due to the reduction in the Local Transport Services Grant to Pembrokeshire County Council from the Welsh Government.

2.7 When considering planning applications, especially those in more remote locations, the Authority tests for accessibility to the nearest Centre. Draft supplementary planning guidance has been published for consultation in 2012.<sup>3</sup>

2.8 **Siting of Farm Buildings:** Supplementary Planning on siting and design of farm buildings has been prepared.<sup>4</sup>

### Policy Performance

| Policy Area   | Indicator 1                           | Target                                 | Performance   |
|---|---------------------------------------|--|---|
| All   | Approvals contrary to recommendation. | 0 approvals contrary to recommendation |  |
| <p><b>Trigger:</b> 3% of planning applications<sup>5</sup> decided contrary to recommendation in any one year.</p> <p><b>Reason:</b> To identify patterns over the Annual Monitoring Report period.</p> |                                       |  |   |


<sup>3</sup> Progress on Supplementary Planning Guidance is listed in Appendix 1.


<sup>4</sup> Progress on Supplementary Planning Guidance is listed in Appendix 1.

<sup>5</sup> Full, outline or reserved matters applications.

**Analysis:** During the period April 2011 to March 2012 441 planning applications were received by the National Park Authority. 1.6% of applications (7) were approved contrary to recommendation.


**Conclusion:** This does not show an undermining of the Local Development Plan strategy and policy framework.

| Policy Area  | Indicator 2   | Target  | Performance   |
|--|---|---|---|
| National Park Purposes & Duty  | Developments which engage the Sandford Principle – where conflict between the two national park purposes becomes acute, the first one must prevail. Carrying out the socio-economic duty in National Parks must be in pursuance of the purposes to Policy 1 ( <b>overarching indicator</b> ). | Target - 0 approvals within or impacting on the National Park which breach the Sandford principle or which result in conflicts between the duty and purposes. ( <b>overarching target</b> ) |  |
| <p><b>Trigger:</b> 1 application approved contrary to the Sandford Principle in any one year.</p> <p><b>Reason:</b> The Sandford Principle is a central component of the National Park purposes and 1995 Environment Act.</p> <p><b>Analysis:</b> No planning applications with a decision date between 1 April 2011 and 31 March 2012 have engaged or breached the Sandford principle.</p> <p><b>Conclusion:</b> This does not show an undermining of the Local Development Plan strategy and policy framework.</p> |   |   |   |

| Policy Area   | Indicator 3a   | Target  | Performance   |
|---|--|---|---|
| Policy 35c) (Strategy Policy)   | Policy 35c) Prioritising affordable housing over self catering | Target - 0 approvals contrary to policies that prioritise certain uses seen to sustain communities in the plan. |  |
| <p><b>Trigger:</b> Approval of 2 applications contrary to policy 35 c) in any one year.</p> <p><b>Reason:</b> This policy provides a windfall opportunity for affordable housing, and with limited land available for development early scrutiny of the policy is appropriate.</p> <p><b>Analysis:</b> Four applications for 2 or more holiday letting units were approved by the Authority during the monitoring period. The reasons for allowing the units to be converted to holiday accommodation rather than affordable housing units are:</p> |  |   |   |

- i. In one instance the buildings being converted were not suitable for full-time residential occupation;
- ii. In the second case the application was linked to a farm diversification proposal; and
- iii. In the third case the application provided evidence to show that it would not be viable to provide affordable housing
- iv. The fourth application was a redevelopment site and provided a net increase of 1 holiday unit. The affordable housing requirement applies to developments of 2 or more dwellings.


**Conclusion:** No conclusions can be drawn as to the effectiveness of the Policy.

| Policy Area  | Indicator 3b   | Target   | Performance   |
|--|--|--|---|
| Policy 42d) & Policy 44 third last paragraph   | Policy 42d) & Policy 44 third last paragraph - Prioritise community uses or affordable housing when re-using employment sites. | 0 approvals contrary to policies seen to protect and provide for community facilities and infrastructure |  |
| <p><b>Trigger:</b> Approval of 2 planning applications contrary to the policy 42d) or Policy 44 third last paragraph in any one year.</p> <p><b>Reason:</b> The National Park does not contain many large scale employment uses and their loss to other uses must continue to support the local community. They are valuable to individual communities and a stringent threshold is appropriate.</p> <p><b>Analysis:</b> The temporary loss of one employment site was approved during the monitoring period (between 1<sup>st</sup> April 2011 and 31<sup>st</sup> March 2012). The approval consisted of the change of use of an employment site of extended disuse to a public car park, permission was granted for three years only. It was recognised that this change of use is contrary to Local Development Plan policy and that a permanent change of use is inappropriate.</p> <p><b>Conclusion:</b> This does not show an undermining of Local Development Plan policy as the above approval as the approval was temporary and would allow the site to be brought back into economic use in the future.</p> |  |  |   |

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

| Policy Area | Indicator 3d  | Target   | Performance |
|-------------|---|--|-------------|
| Policy 48   | Community Facilities & Infrastructure Requirements. | 0 approvals contrary to policies seen to protect and provide for community facilities and infrastructure |             |

Please see analysis under Indicator 26.

| Policy Area   | Indicator 4  | Target   | Performance   |
|---|--|--|---|
|   | Effectiveness of Policies (Policy 2 to 7) & Supplementary Planning Guidance when dealing with Applications at Appeals. | Inspector does not raise issues regarding the effectiveness of the policies or supporting supplementary planning guidance. |  |
| <p><b>Analysis:</b> In the period April 11 to March 12 two appeal decisions cited Policy 2 'Tenby Local Service and Tourism Centre', three cited Policy 5 'St Davids Local Centre', one cited Policy 6 'Rural Centres' and five cited Policy 7 'Countryside', giving a total of eleven decisions. Two of these appeals were allowed, one citing Policy 2 and one citing Policy 6. The appeal which cited Policy 2 related to the change of use of a former hostel to residential apartments in Tenby, the Inspector allowed the appeal without the provision of affordable housing, considering provision to be unviable. Please refer to the appeals section for policies 44-47 for more detail and the Authority's response in light of this decision. The appeal that was allowed, which cited Policy 6, was allowed on design considerations rather than the criteria outlined in this policy, which did not form a reason for the initial refusal.</p> <p><b>Conclusion:</b> None of the above appeal decisions dispute the appropriateness of the policies for consideration in these decisions, nor their soundness. There does not seem to be a pattern emerging in which these policies are not supported by Inspectors.</p> |  |  |   |

## A. Special Qualities


### Key outcome

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

### Context

- 2.9 **Welsh Government legislative programme:**<sup>6</sup> The First Minister has<sup>7</sup> published legislative priorities of the Welsh Government until 2016. This included the proposal to introduce an Environment (Wales) Bill during the five year term. The Environment Bill will enable a more integrated approach to the management of the environment, as well as helping to improve urban green spaces. The Bill will also provide an opportunity to put in place a clear Welsh environmental legislation which is fit for the future. Following the consultation on the 'Sustaining a Living Wales' Green Paper, Welsh Government expect to produce a White Paper prior to introduction of the Bill. There are also likely to be White Papers on the forthcoming Sustainable Development and Planning Bills. Taken together, these Bills provide the opportunity to bring in changes in a phased, evolutionary way.
- 2.10 The enactment of this legislation and any implications for Plan review will need to be identified.
- 2.11 **Regionally Important Geodiversity Sites** supplementary planning guidance has been adopted in October 2011.<sup>8</sup>
- 2.12 **Protected species:** Funding was obtained through the Planning Improvement Fund to perform a desk-based review of compliance and outcomes monitoring for protected species planning conditions. The principal recommendation was that the Authority (perhaps through the Welsh Local Government Association) should seek information sharing between the Welsh Government derogation licensing and local authority planning regimes. Other recommendations included a suggestion that the Authority reviews and updates its Supplementary Planning Guidance on Biodiversity and Planning (the current guidance pre-dates, in particular, the current Local Development Plan (2010), Technical Advice Note 5 (2009), and the Natural Environment and Rural Communities Act 2006).
- 2.13 **Historic Environment:** The First Minister has indicated that a Heritage Bill is expected to come forward within the fourth year of the Welsh Government legislative programme.
- 2.14 **Welsh Language:** The Welsh Government consulted on a review of Technical Advice Note 20 – Welsh Language which ended on 13<sup>th</sup> June 2011. The outcome of the consultation is awaited. This may have implications for future monitoring and review of the Local Development Plan. At a conference held in April 2012, it was indicated that the Welsh Government were aiming to publish the revised Technical Advice Note in summer 2012.

### Policy Performance

| Policy Area                | Indicator 5  | Target      | Information source  |
|----------------------------|--|-------------|---|
| Policy 8 (Strategy Policy) | Approvals contrary to Strategy Policy 8 Special Qualities. | 0 approvals |  |


<sup>6</sup> <http://uknea.unep-wcmc.org/Resources/tabid/82/Default.aspx>

<sup>7</sup> <http://wales.gov.uk/newsroom/firstminister/2011/110712legislative/?lang=en> 12 July 2011

<sup>8</sup> <http://www.pembrokeshirecoast.org.uk/default.asp?PID=188>

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| Policy Area   | Indicator 5                           | Target | Information source |
|---|---------------------------------------|--------|--------------------|
|   | Approvals contrary to Recommendation. |        |                    |
| <p><b>Trigger:</b> 2 developments permitted contrary to any criterion in any one year.</p> <p><b>Reason:</b> The Special Qualities are central to National Park Purposes set out in the Environment Act 1995.</p> <p><b>Analysis:</b> In the period 1<sup>st</sup> April 2012 to 31<sup>st</sup> March 2012 show that there was one proposal approved contrary to recommendation which referred to Policy 8.</p> <p><b>Conclusion:</b> This does not show an undermining of the Local Development Plan Policy 8 as to date no pattern has emerged in terms of numbers of applications overturned where Policy 8 issues arose.</p> |                                       |        |                    |

| Policy Area   | Indicator 6  | Target   | Performance  |
|---|--|--|--|
|   | Effectiveness of Policies (Policy 1 and Policies 8 to 18) & Supplementary Planning Guidance (Landscape Character, Regionally Important Geodiversity Sites and Historic Environment) when dealing with Applications at Appeals. | Inspector does not raise issues regarding the effectiveness of the policies or supporting supplementary planning guidance. |  |
| <p><b>Analysis:</b> In the period April 11 to March 12, six appeal decisions cited Policy 1 'National Park Purposes and Duty', ten cited Policy 8 'Special Qualities' and fourteen cited Policy 15 'Conservation of the Pembrokeshire Coast National Park. A total of fifteen appeal decisions cited policies within this section. Six of these appeals were allowed.</p> <p><b>Conclusion:</b> None of the above appeal decisions dispute the appropriateness of the policies for consideration in these decisions, nor their soundness. There does not seem to be a pattern emerging in which these policies are not supported by Inspectors. Of the six appeals allowed, five were based on design considerations, where the Inspector's judgement differed to the Authority's. One appeal was allowed on judgement of a policy outside of this section.</p> |  |  |  |

## B. Major development, the potential for growth

### Key outcomes

- (1) No new major development in the National Park unless there are exceptional circumstances.<sup>9</sup>
- (2) The provision of waste facilities to cater for National Park generated needs or to work with the County Council to provide waste facilities serving both areas outside the National Park.

### Context


2.15 **Minerals:** The Welsh Government has published the Mineral Resource Map of Wales in 2010. Guidance and maps for planning authorities in relation to safeguarding the minerals resources of Wales is anticipated in September 2012. They may have implications for the monitoring and review of the plan.

2.16 **National Plans for inshore and offshore areas:** The Welsh Government intends to develop a national plan for the Welsh inshore area and a national plan for the Welsh offshore area and adopt them by 2012/13.<sup>10</sup> There may also be, following agreement, of the marine plans the development of sub-national plans (paragraph 6, page 3). It is intended that integration between marine and terrestrial documents will be achieved:

*'Terrestrial planning policy and development plan documents already include policies addressing coastal and estuarine planning. Marine policy guidance and plans will seek to complement rather than replace these, recognising that both systems may adapt and evolve over time.'* This will help ensure, for example, that developments in the marine environment are supported by the appropriate infrastructure on land and reflected in terrestrial development plans and vice versa.' No further advice on Welsh marine plans has been issued since Welsh Government consulted on its approach in February 2011. Update from Welsh Government August 2012: It is not anticipated that Marine Plans will be in place in Wales by 2013. No firm date or timetable has been decided on yet.

2.17 No immediate action to review the Local Development is necessary given this current position.

### Policy Performance

| Policy Area       | Indicator 7   | Target   | Performance   |
|-------------------|---|--|---|
| Major development | Approvals of proposals that engage Major Development Test | 0 approval of major development unless exceptional circumstances are proven. |  |

<sup>9</sup> See *Planning Policy Wales, Edition 4, July 2010, paragraph 5.5.6; Minerals Planning Policy Wales, December 2000, paragraph 21, page 11; Minerals Technical Advice Note 1: Aggregates 2004, paragraph 52; Mineral Technical Advice Note (MTAN) Wales 2: Coal, paragraphs 74 to 79, page 159, South West Wales, Regional Waste Plan 1<sup>st</sup> Review (August 2008); Circular 125/77 Roads and Traffic – National Parks.*

<sup>10</sup> See summary, page 2, *Consultation Document Sustainable Development for Welsh Seas: Our Approach to Marine Planning in Wales* issued 16 February 2011


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**Trigger:** Approval of 1 major development where no exceptional circumstances are shown in any one year.

**Reason:** To ensure a consistent approach with first purpose and Planning Policy Wales Major development test.

**Analysis:** Between April 1<sup>st</sup> 2011 and March 31<sup>st</sup> 2012 one application for a major development was approved (Trefigin Quarry extension, see analysis under Indicator 8)

**Conclusion:** There are no issues arising regarding the policy framework of the Plan.

| Policy Area  | Indicator 8                           | Target   | Performance   |
|--|---------------------------------------|--|---|
| Minerals   | Applications for minerals development | 0 approval for new minerals development unless exceptional circumstances are proven. |  |
| <p><b>Trigger:</b> 1 new or extended mineral site permitted when exceptional circumstances are not shown in any one year.</p> <p><b>Reason:</b> This would have a major impact on the minerals strategy. The trigger would not include borrow pits.</p> <p><b>Analysis:</b> There has been one approval for an extension to an existing mineral site during the Plan monitoring period. An extension to Trefigin Quarry was approved by Welsh Government in October 2011. The National Park Authority sought to approve this application and an application at Pantgwyn Quarry under the policies of the adopted Joint Unitary Development Plan which committed the Authority to maintaining a joint landbank with the County Council. (see paragraph 6.8.19) of the Joint Unitary Development Plan.</p> <p>Approval of the applications would also importantly allow for a transition from operations within the National Park to operations outside the National Park, in accord with the direction of travel outlined within the Regional Technical Statement. (appendix 20 and pages 83 and 84 for Pembrokeshire County Council &amp; Pembrokeshire Coast National Park Authority).</p> <p><b>Conclusion:</b> In terms of direct implications for the Local Development Plan, there are very little. There are no implications for a landbank as the Authority has chosen to not maintain one. There would be a need to amend the Minerals Buffer Zone around each permitted site, this can be implemented through the planning application constraints layer, and the Local Development Plan at review.</p> <p>Also Appendix 1 of the Plan would benefit from updated position in relation to permitted reserves, notwithstanding that this may change over time.</p> |                                       |  |   |

| Policy Area | Indicator 9  | Target  | Performance |
|-------------|--|---|-------------|
|             | Effectiveness of Policies (Policies 19 to 28) & Supplementary Planning Guidance (Land Instability from | Inspector does not raise issues regarding the effectiveness of the policies or supporting |             |

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|   |   |                                  |  |
|---|---|----------------------------------|--|
|   | coal workings Safeguarding Minerals,) when dealing with Applications at Appeals | supplementary planning guidance. |  |
| <p><b>Analysis:</b> In the period April 11 to March 12 no Inspectorate appeal decisions refer to these policies or supplementary planning guidance in their decision making. Please note Welsh Government's decision above in relation to Trefigin quarry under Indicator 8.</p> <p><b>Conclusion:</b> No conclusion about effectiveness can be made.</p> |   |                                  |  |

## C. Climate change, sustainable design, flooding, sustainable energy

### Key outcomes

- (1) Development achieving high standards in terms of sustainable design with all new dwellings meeting the standards set out in national planning policy.<sup>11</sup>
- (2) The National Park contributing to renewable energy generation.<sup>12</sup>
- (3) No vulnerable development<sup>13</sup> in areas which would be at risk of flooding both now and in the long term and with no negative impacts elsewhere.

### Context

2.18 **Sustainable Design:** A forthcoming contextual change to monitor is the effect of Welsh Government's proposed changes to Building Regulations Wales on the national planning policy on sustainable buildings. The Building Regulations were devolved to the Welsh Government on the 31<sup>st</sup> December 2011, proposed revisions to Part L (Conservation of fuel and Power) and national development management policy are currently being consulted on, the consultation period ends on the 23<sup>rd</sup> October 2012. It is intended to introduce the proposed changes in 2013. The Welsh Government expects all new homes and non domestic buildings in Wales to be built to zero carbon (and nearly zero energy) by 2020, the proposed changes represent a significant step towards that objective. For existing buildings, the changes seek to raise the standards for controlled works where it can be shown to be cost effective. They also seek to extend the requirements for 'consequential improvements', to reduce emissions from the existing building stock. New measures to improve compliance with the new regulations and performance once developments are built will also be introduced. The main proposed change to national planning policy is to remove the requirement of a minimum Code/BREEAM standard, utilising the new Building Regulations to deliver this objective.<sup>14 15</sup>

2.19 Supplementary Planning Guidance on sustainable design and building extensions was adopted in June 2011. The building extensions guidance requires energy, water and drainage efficiency improvements to be sought in the original building as well as the extension where appropriate and practicable. A condition would then be placed on the approval to ensure the improvements are carried out in accordance with the details of the application. However it has become apparent that this policy approach is

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<sup>11</sup> The Welsh Assembly Government expects the required standards to be made progressively higher over time, in pursuit of its aspiration for all new buildings to be "carbon neutral" by 2011.

<sup>12</sup> Please see the Monitoring Section of the Plan. Likely contributions are taken from the Renewable Energy Assessment weblink: <http://www.pcnpa.org.uk/website/default.asp?SID=1317&SkinID=5>

<sup>13</sup> 'Vulnerable developments' are defined in the Technical Advice Note 15: Development and Flood Risk on flooding, please see Figure 2 page 7: weblink [http://new.wales.gov.uk/docrepos/40382/epc/planning/403821/40382/403821/\(560\)\\_july04-tan15-e.pdf?lang=en](http://new.wales.gov.uk/docrepos/40382/epc/planning/403821/40382/403821/(560)_july04-tan15-e.pdf?lang=en)

<sup>14</sup> 2012 consultation on changes to the Building Regulations in Wales Part L (Conservation of fuel and power) Section one - The consultation proposals

<http://wales.gov.uk/topics/housingandcommunity/housing/publications/buildingregsstatement/?lang=en>

<sup>15</sup> Policy Statement - Welsh Assembly Government announces target for first changes to Welsh Building Regulations

<http://wales.gov.uk/topics/housingandcommunity/housing/publications/buildingregsstatement/?lang=en>

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ineffective in promoting energy efficiency in existing buildings. Where this approach has come before an Inspector (3 separate appeals), it has been challenged as being unduly onerous, failing to meet the 6 tests of planning conditions under Circular 35/95 *The Use of Conditions in Planning Permissions* and relating to building elements which do not require planning permission. In light of these appeal decisions, the Authority has sought guidance from the Inspectorate, in addition to separate legal advice. A possible alternative approach, to be more in line with primary legislation and national planning policy, would be to only require improvements in the existing building when achieving an acceptable energy efficiency level for the extension is dependent upon doing so. However, significant practical difficulties in deciphering when this would be the case and what level of improvements would be required exist. It is also considered that this approach would not apply to the vast majority of applications for extensions. This, coupled with the above mentioned advances in Building Regulations, has led to the development management implementation of this aspect of the Policy no longer being implemented and the accompanying supplementary planning guidance being withdrawn as of the 1<sup>st</sup> September 2012.<sup>16</sup>

2.20 **Sustainable Energy:** The Marine Renewable Energy Strategic Framework project March 2011<sup>17</sup> has investigated the potential marine renewable energy resource of Welsh Territorial Waters (TWs) and considered potential scenarios for the sustainable development of that resource primarily as an aid to policy development and also an indicator of resource for potential developers.

2.21 Of note for the National Park is the advice contained at paragraph 7.4 ...*Access to grid is frequently raised as being a significant constraint on the development of wave and tidal stream, both in Wales and more widely. Halcrow is investigating the on shore infrastructural requirements for likely off-shore development and it is anticipated that this will be reported on by the end of the year (2011)*<sup>18</sup>

2.22 The Study has been submitted to Welsh Government in August 2012. No dates have been provided as to when it will be made public. The implications of this report for Plan review will need to be considered in the next annual monitoring report.

2.23 Supplementary Planning Guidance on Renewable Energy was adopted in October 2011. An addendum on field array panels was adopted in June 2012.<sup>19</sup>

## Policy Performance

| Policy Area        | Indicator 10  | Target                                   | Performance |
|--------------------|---|--|-------------|
| Sustainable Design | Incorporation of renewable energy technology within | Relevant schemes incorporating renewable | N/A         |

<sup>16</sup> <http://www.pembrokeshirecoast.org.uk/default.asp?PID=183>


<sup>17</sup> <http://mresf.rpsgroup.com/>



<sup>18</sup> Jane Davidson, *Marine Energy Seminar 4<sup>th</sup> March 2011, Pembroke Dock*

<sup>19</sup> <http://www.pembrokeshirecoast.org.uk/default.asp?PID=183>

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|  |  |        |                      |  |
|--|--|--------|----------------------|--|
| Policy 20  |  | scheme | energy technologies. |  |
| <p>Given the emphasis in Technical Advice Note 22, June 2010 on developers needing to look to achieve the minimum carbon standard through passive design and energy efficiency first, before considering how further emission savings can be achieved through the use of low and zero carbon energy technologies this indicator is no longer considered appropriate. (paragraph 4.4.1)</p> |  |        |                      |  |

| Policy Area  |  | Indicator 11   | Target   | Performance   |
|--|--|--|--|---|
| Sustainable Design Policy 20   |  | Compliance with code for sustainable homes <sup>20</sup> | Target - 100% meeting national policy requirements |  |
| <p><b>Trigger:</b> failure to achieve across 100% of residential developments</p> <p><b>Reason:</b> Requirement of Planning Policy Wales Technical Advice Note 22: Planning for Sustainable Buildings.</p> <p><b>Analysis:</b> Permissions granted between April 2011 and March 2012 complied with the Planning Policy Wales requirements (paragraph 4.11.4).</p> <p><b>Conclusion:</b> There are no issues arising.</p> |  |  |  |   |


| Policy Area  |  | Indicator 12a   | Target   | Performance   |
|--|--|---|--|---|
| Renewable Energy Policy 21   |  | Capacity of renewable energy schemes permitted and completed. | Planning permissions to contribute to an overall Renewable Electricity Target for the National Park of 4.91GWh.                      |  |
| Policy Area  |  | Indicator 12b   | Target   | Performance   |
| Renewable Energy Policy 21   |  |   | (Target - Planning permissions to contribute to an overall Renewable Heat Target for the National Park of between 35.2 to 40.7 GWh.) |  |
| <p>No triggers have been identified for the above. There are two main difficulties with monitoring renewable energy provision. Firstly renewable energy generated from micro household renewable schemes and small scale individual schemes are allowed as permitted development and secondly applicants do not currently need to provide information in respect of the renewable energy capacity associated with their planning application. There is also difficulty in distinguishing whether the</p> |  |   |  |   |

<sup>20</sup> This includes better management of surface water run-off to cope with the impacts of climate change.

| Policy Area | Indicator 12a | Target | Performance   |
|-------------|---------------|--------|---|
|             |               |        | <p>panels are for electricity generation or heating water. Biomass in particular is seen as a potentially significant contributor to the renewable heat targets in the Plan and generally enjoys permitted development rights.</p> <p>Nevertheless the Authority will continue to monitor the provision where permission is required. Some estimates are necessary where information is lacking.</p> <p><b>Analysis:</b> Electricity Generation Gwh (estimate) equals an estimated 2.48 Gwh if all the permissions granted since 2006 are implemented. The proposals are primarily for wind turbines and photovoltaics.</p> <p>Heat Generation Per Annum Gwh (estimate) equals an estimated 2.82 Gwh primarily from solar panels.</p> <p>The approach to Plan policy preparation was to ensure that the Authority was encouraging and supportive of renewables unless there are overriding environmental or amenity issues. An analysis of approvals versus refusals shows that since 2006 there have been an estimated 14 refusals of permission (the majority of them predating the adoption of the Local Development Plan policy) and 120 approvals for various types of renewable energy.</p> <p><b>Conclusion:</b> Even though permitted development rights means that all proposals cannot be counted the Plan is ahead of potential target on electricity generation (if all those with permission are assumed to have been constructed) but behind on heat generation. This is likely to be due mainly 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.</p> |


| Policy Area   | Indicator 12c                                    | Target  | Performance   |
|---|--|---|---|
| Renewable Energy Policy 21  | Renewable Energy Supplementary Planning Guidance | All decision making is consistent with the Authority's Renewable Energy Supplementary Planning Guidance |  |
| <p><b>Trigger:</b> 3 or more decisions contrary to the principles set out within the Renewable Energy supplementary planning guidance.</p> <p><b>Reason:</b> Although the contribution provided by renewables is important it is difficult to monitor (see below). A more meaningful measure is how effective the Renewable Energy Supplementary Planning Guidance will be (to be adopted October 2011) in providing a supportive context for renewables provision while protecting the special qualities of the National Park. Deciding applications contrary to this in principle support set out in the Supplementary Planning Guidance should trigger a review.</p> <p><b>Analysis:</b> A review of permissions granted and refused for renewable energy schemes during the monitoring period (April 1<sup>st</sup> 2011 and March 31<sup>st</sup> 2012) shows that there have been an estimated 4 refusals of permission and 27 approvals, all of these have been in line with policy and the Supplementary Planning Guidance (for applications made after adoption in October 2012).</p> <p><b>Conclusion:</b> The policy context and supplementary planning guidance is providing a positive</p> |  |   |   |

| Policy Area                                |  | Indicator 12c | Target | Performance |
|--|--|---------------|--------|-------------|
| framework for renewable energy generation. |  |               |        |             |

| Policy Area   |   | Indicator 13  | Target  | Performance   |
|---|---|---|---|---|
| Flooding<br>Policy 34   | W | Amount of development (by TAN 15 paragraph 5.1 development category) permitted in C1 and C2 floodplain areas not meeting all TAN 15 tests (paragraph 6.2 i-v) | Development is not permitted where the long term scenario (in the next 60 year) would fail the tests set out above. |  |
| <p><b>Trigger:</b> 1 development permitted contrary to policy 34.</p> <p><b>Reason:</b> Can be severe consequences of inappropriate development. This is a Welsh Government indicator.</p> <p><b>Analysis:</b> All applications within areas identified by Technical Advice Note 15 or Shoreline Management Plan 2 as having potential for flooding have been screened by the Environment Agency. All applications permitted within these areas relate to replacement dwellings, extensions to dwellings where the residential use is already established or are for developments permitted within the requirements of Technical Advice Note 15. No proposals have been permitted contrary to Policy 34 of the Plan.</p> <p><b>Conclusion:</b> The policy context set out in Technical Advice Note 15 and the Local Development Plan is providing an appropriate framework to minimise the future risk of flooding.</p> |   |   |   |   |

| Policy Area  |   | Indicator 14   | Target   | Performance          |
|--|---|--|--|----------------------|
| Location of Growth   | W | Percent of new development permitted on previously developed land. | 33% of the housing land supply on previously developed land.<br>45% of the employment land on previously developed land. | Assessment due 2014. |
| <p><b>Trigger:</b> Failure to achieve the targets of 33% and 45% by the formal plan review period.</p> <p><b>Reason:</b> Limited supply of development land, means an assessment would be appropriate.</p> <p><b>Analysis:</b> For formal review stage.</p> <p><b>Conclusion:</b> For formal review stage.</p> |   |  |  |                      |

| Policy Area |  | Indicator 15  | Target  | Performance |
|-------------|--|---|---|-------------|
|             |  | Effectiveness of Policies (Policy 29 to 34) & Supplementary | Inspector does not raise issues regarding the |             |

| Policy Area  | Indicator 15  | Target   | Performance   |
|--|---|--|---|
|  | Planning Guidance (Sustainable Design Guidance, Extensions, Renewable Energy) at Appeals and when dealing with Applications | effectiveness of the policies or supporting supplementary planning guidance. |  |
| <p><b>Analysis:</b> In the period April 11 to March 12 ten appeal decisions cited these policies. Of the ten, six decisions cited Policy 29 'Sustainable Design' and nine decisions cited Policy 30 'Amenity'. Three appeal decisions were allowed where the Inspector did not consider that the proposals in question would cause harm to the special landscape character of the National Park. In one of these appeal decisions for an extension to a dwelling, the Inspector questioned the Authority's application of Policy 29 and the Building Extensions Supplementary Planning Guidance in seeking energy efficiency improvements to the host dwelling. The Inspector did not include the suggested condition, that would require these improvements. The Inspector stated that such a condition did not relate to development which required planning permission and would therefore not be enforceable. Please refer to paragraph 2.19 within this section for further details on the Authority's response to this and other (more recent) decisions which raise similar concerns.</p> <p><b>Conclusion:</b> The Authority's approach in seeking energy efficiency improvements to the building as a whole when dealing with extensions, under Policy 29 and the Building Extensions Supplementary Planning Guidance, has been questioned. The Authority is addressing this issue, see para 2.19. In all other aspects, Policy 29 appears to be effective. Policy 30 also appears to be effective.</p> |   |  |   |

## D. Visitor economy, employment and rural diversification

### Key outcomes

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

### Context

**2.24 Recreation:** Paragraph 4.156 of the Local Development Plan advises that supplementary planning guidance will be provided to guide recreational activities in the National Park. Draft supplementary planning guidance was approved by the National Park Authority in June 2012 and is currently published for public consultation. The closing date of the consultation is 19<sup>th</sup> October 2012<sup>21</sup>.

**2.25 Revision to Planning Policy Wales, Chapter 7; Supporting the Economy<sup>22</sup>:** Following on from research prepared for the Welsh Government in June 2011, revision to Chapter 7 of Planning Policy Wales was published for consultation between November 2011 and March 2012. The revised policy seeks to redress a perception that the economic component of sustainable development has been overlooked. Local planning authorities are required to adopt a more holistic approach to economic development, adopting a 'whole economy' approach by recognising that most development has some economic impact. The needs of the entire economy should therefore be considered including retail, leisure, tourism, sport, recreation and other services as well as the traditional employment uses defined under parts B1 to B8 of the Town and Country Planning Use Classes Order.

2.26 The consultation also asked about the structure of a new Technical Advice Note which is to be published in 2012.

2.27 The wholistic approach to considering economic development is in line with the wider Local Development Plan approach to ensure availability of land and deliverability of development. To ensure this, local planning authorities will now be expected to undertake and keep up to date Employment Land Reviews at a local and strategic level in collaboration with other authorities. Confirmation has been sought and received from Pembrokeshire County Council that they maintain such data and are willing to work in collaboration with neighbouring authorities.

2.28 A large number of Welsh local planning authorities made a joint bid to the Welsh Government for funding to create a Joint Employment Land Availability database. The Pembrokeshire Coast National Park Authority supported the bid. Confirmation has recently been given that the bid was successful. A working group is now being set up to take this work forward.

2.29 The publication of the revised Chapter 7, Technical Advice Note and subsequent Employment Land Review will be an issue to consider for the next Annual Monitoring Report.

2.30 **Dale Airfield:** Dale Airfield occupies an extremely important and prominent site within the

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[http://www.pembrokeshirecoast.org.uk/files/files/Dev%20Plans/PublicConsultations/Draft\\_Recreation\\_SPGNNewmap.pdf](http://www.pembrokeshirecoast.org.uk/files/files/Dev%20Plans/PublicConsultations/Draft_Recreation_SPGNNewmap.pdf)

<sup>22</sup> Weblink:

<http://wales.gov.uk/consultations/planning/ppwch7consultation/?lang=en&status=closed>



Pembrokeshire Coast National Park and has recently been purchased by several different owners. The site provides a number of concerns but also possibilities. The wartime buildings are in a poor state of repair, and with a lack of use could become visually intrusive. Conversely their use in any intensive manner is of concern with regard to the impact of activity on the tranquil nature of this part of the National Park and also with regard to the highway network which is mainly single track country roads. It is also not a site that would be sustainable in terms of location being distanced from any alternative means of travel to the private car.

2.31 The site could however offer a huge opportunity for both biodiversity, quiet recreation and interpretation of what Cadw consider to be the most important World War 2 airfield in Wales. It is considered that a feasibility project needs to be carried out as to the potential for the site and to enable the Authority to work proactively with the owners to ensure this site provides positive benefits in the long term. Due to lack of resources this study is unlikely to take place before March 2013.

2.32 **Rural Development:** The previous Technical Advice Note 6 was used to draft the Local Development Plan This new Note provides new guidance on:

- the need for Development Plans to define '**local need**' taking into account the social, economic and environmental characteristics of the area. Where possible existing definitions of local need, for example affordable housing to meet local need, should be adopted, or if necessary modified to include other land uses. (Paragraph 2.2.2) Where proposals are intended to meet local needs, planning authorities should recognise that a site may be acceptable even though it may not be accessible other than by private car. (Paragraph 2.2.3)

This new introduction means that for Policy 7 of the Plan where the Plan as adopted did not allow either infill or rounding off or conversion of buildings in inaccessible locations this did not allow for 'local need' uses. The only local need definition in the adopted Plan at present is for affordable housing. To consider whether widening the definition of local need is necessary is best done in light of monitoring the implementation of the Policy up until formal review stage 2014/2015. There is also an issue emerging in relation to current planning applications for the conversion of buildings which also need to be considered in such a review. Application of the policy means that there instances where the Authority would not be allowing the conversion of a building to potentially any use where affordable housing is not a viable option in an inaccessible location. This can mean, for example, that a building of local importance could be left to deteriorate. Currently the merits of retaining these particular buildings are being treated as exceptions to Plan policy. The approach being taken by the Authority is clarified in the draft Supplementary Planning Guidance on Accessibility published for public consultation on 19<sup>th</sup> October 2012<sup>23</sup>.

- **Rural enterprise dwellings** being permitted (previously only referred to as agricultural and forestry dwellings). Policy 7 of the Local Development Plan will require a technical update at formal review stage to take account of this widening of opportunities). Current applications are being considered under the new national policy and guidance.
- **One Planet Development:** This is a new policy area which adds additional requirements to proposals considered under the Low Impact Development Policy of the Plan, Policy 47. The Authority has the benefit of an Inspector's appeal decision a Coheston where these additional considerations were identified. The Welsh Government has commissioned work to provide additional advice for applicants and authorities on One Planet Development. The outcomes can be considered in the drafting of supplementary planning guidance on low impact proposals


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
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[http://www.pembrokeshirecoast.org.uk/files/files/Dev%20Plans/PublicConsultations/Consultation\\_accessibility\\_SPGJune2012.pdf](http://www.pembrokeshirecoast.org.uk/files/files/Dev%20Plans/PublicConsultations/Consultation_accessibility_SPGJune2012.pdf)


under Policy 47. It is not envisaged at present that the outcomes of the Welsh Government research will necessitate a review of the Plan policy but this will need to be monitored – the Welsh Government advice should be available by the end of October 2012. The drafting of the Supplementary Planning Guidance on Low Impact proposals has been delayed until the outcome of the Welsh Government research is known. In the interim the current guidance (prepared under the Joint Unitary Development Plan) along with Technical Advice Note 6 and the recent Inspector's appeal decision is being used when considering such proposals.

## Policy Performance

| Policy Area  | Indicator 17             | Target   | Performance   |
|--|--------------------------|--|---|
| Policy 43  | Loss of employment sites | 0 approvals of loss of employment sites except where justified within the terms of the policy. |  |
| <p><b>Trigger:</b> Loss of two or more employment sites or 500 sq metres contrary to recommendation</p> <p><b>Reason:</b> Small employment sites can make an important contribution to sustainable communities.</p> <p><b>Analysis:</b> One application has been permitted to use a former garage in Tenby as a car park. The proposal would be contrary to Policy 43 of the Local Development Plan, but permission has been granted on a temporary (3-year) basis so as not to preclude the future use of the site for employment use. The site measures 0.46 hectares. The decision followed the Officer recommendation to permit the car park use for a temporary period.</p> <p><b>Conclusion:</b> This is a single proposal which has been given temporary permission to allow the site to be considered for employment use in the future. The decision does not affect the long-term thrust of the policy.</p> |                          |  |   |

| Policy Area   | Indicator 18  | Target  | Performance   |
|---|---|---|---|
| Visitor Accommodation<br>Policy 35  | Counts of hotel spaces, self catering, caravan and camping spaces (Hotels, self catering, caravan databases etc). | Maintain current levels of provision except where loss of hotel proven. |  |
| <p><b>Trigger:</b> 1 or more developments contrary to recommendation in any one year.</p> <p><b>Reason:</b> The impact of such development changes on National Park purposes. There is a need to maintain current provision.</p> <p><b>Analysis:</b> No applications were approved contrary to this policy during the monitoring period.</p> <p><b>Conclusion:</b> There are no issues arising.</p> |   |   |   |

| Policy Area   |  | Indicator 19  | Target             | Performance   |
|---|--|---|--------------------|---|
| Special Qualities<br>Policy 8   |  | Proposals for recreational activity contrary to Policy 8. | Target 0 approvals |  |
| <p><b>Trigger:</b> 2 or more recreational activity developments contrary to the Recreational Activities Supplementary Planning Guidance (draft in preparation – see timescale in Appendix 1).</p> <p><b>Reason:</b> The special qualities (Environment Act 1995) could be significantly affected by such development.</p> <p><b>Analysis:</b> The target has been met during the monitoring period with 0 approvals contrary to Policy 8. This will be supported by supplementary planning guidance which is currently published for public consultation.</p> <p><b>Conclusion:</b> Decisions made have consistent with policy.</p> |  |   |                    |   |

| Policy Area   |  | Indicator 20  | Target   | Performance   |
|---|--|---|--|---|
|   |  | Effectiveness of Policies (Policy 35 to 43) & Supplementary Planning Guidance (Recreational Activities, Loss of Hotels) when dealing with Applications and at Appeals | Inspector does not raise issues regarding the effectiveness of the policies or supporting supplementary planning guidance. |  |
| <p><b>Analysis:</b> In the period April 11 to March 12 one Inspectorate appeal decision referred to Policy 40 'Site Facilities on Ten, Chalet and Caravan Sites', in relation to the siting of temporary toilet and shower accommodation at a camping and caravan site. This appeal was dismissed as the development, amongst other things, was not considered to be of a scale or design that was compatible with the character of the area. No concerns were raised by the Inspector in relation to the Authority's application of this policy.</p> <p><b>Conclusion:</b> Whilst this provides limited indication, Policy 40 appears to be effective.</p> |  |   |  |   |

## E. Affordable housing and housing growth

### Key outcomes


- (1) An estimated 1,600 new dwellings are provided of which a minimum of 530 new affordable homes are provided.
- (2) If by the end of the financial year 2014/15 the number of affordable homes built or under construction is below 80% of the proportion of the overall target for the Plan period which should be available by that date, the Authority will immediately commence a review of the Affordable Housing Strategy Policy.
- (3) A higher density of development is achieved – a minimum of 30 dwellings to the hectare in the Local Development Plan's Centres<sup>24</sup>.

### Context

**2.24 Review of S106 agreements for affordable housing and mortgage lending:** The Welsh Local Government Association is currently leading on a review of the approach taken in Wales to S106 drafting to ensure that owners of affordable housing delivered in Wales can find a mortgage. The outcome is anticipated.<sup>25</sup> This is likely to mean a review of the approach to occupancy controls set out in the Authority's adopted supplementary planning guidance.

**2.25 Affordable Housing Contribution:** This proposal which asks for an affordable housing contribution on single dwellings formed part of the Supplementary Planning Guidance on Affordable Housing.<sup>26</sup> Taking account of comments received during the consultation, the amount required will be calculated at a cost per square metre. A phased introduction, suggested by consultees, who included property developers and builders, will mean from October 1st 2011 the contribution will be £100 per square metre. This will rise to £150 on October 1st 2012 and from October 1st 2013 it will be £250. Both of these mechanisms were introduced as it was recognised that there are economic difficulties which impact not only on developers but also those who are in housing need. Appendix 3 lists those contributions required by condition so far.

### Policy Performance

| Policy Area  |   | Indicator 21  | Target                  | Performance   |
|--|---|---|-------------------------|---|
| Housing  | W | The housing land supply taken from the current Housing Land Availability Study (TAN1) | Minimum 5 years supply. |  |
| <b>Trigger:</b> Less than a 5 year supply in any one year. |   |   |                         |   |

<sup>24</sup> See Glossary of Terms

<sup>25</sup> <http://wales.gov.uk/consultations/housingcommunity/housewhitepaper/?lang=en>, paragraph 4.32

<sup>26</sup> <http://www.pembrokeshirecoast.org.uk/default.asp?PID=183>

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**Reason:** It is important to deliver the affordable housing strategy.

**Analysis:** The Authority is required to demonstrate a five year effectively available housing land supply. The 2011 study was completed in August 2012. The report uses the residual method to calculate the land supply and concludes that the National Park has a 3.8 year land supply. The housing land supply for 2010-2011 was 4.5 years. The Local Development Plan was adopted in September 2010.

Paragraph 5.1 of Technical Advice Note 1 (Joint Housing Land Availability Studies) details what planning authorities should do where the study shows a land supply below the 5 year requirement, including the need to give considerable weight to increase supply when dealing with planning applications for housing developments. This was supplemented by advice from given by Jane Davidson AM in 2007 that Authorities will continue to approve new housing developments, provided that all other relevant policy considerations are met. Other suggested actions are reviewing the development plan, releasing land in the Authority's ownership and securing the provision of infrastructure for particular sites which prospective developers may be prepared to finance in whole or in part. In order to address this shortfall the National Park Authority is continuing with the following actions:

- Approving planning applications for housing developments, provided all relevant policy considerations are met. This is shown through the 5 year land supply figures. Of the total dwellings included in the 5 year land supply, 38% are on sites allocated in the Local Development Plan. The remaining 62% of dwellings are on land with planning permission, including 15% on sites of less than 5 units. This clearly demonstrates that the Authority is continuing to approve applications for residential development beyond that allocated in the Local Development Plan.
- In August 2012 the Authority prepared a brief to tender for consultants to undertake a study into identifying and costing the development of sites allocated in the Local Development Plan and to report how they can be addressed. The consultants are due to be appointed in September 2012 and the study will conclude at the beginning of February 2013. The outcomes of this study will help to inform the deliverability of sites.
- Continuing to communicate with landowners and liaise with other stakeholders to investigate intentions to bring land forward for development and to assist in this process wherever possible. Appendix 2 sets out the current position on allocated sites. This also includes investigating the potential for land releases (including exceptional land releases) for affordable housing provision with the local housing associations and Rural Housing Enabler.
- The Authority has reviewed the potential for release of the limited land in its ownership during the preparation of the Local Development Plan. None of the land in its ownership, within the National Park area was appropriate for development, for the following reasons:
  - a) The land is situated in remote locations;
  - b) Land is used for other purposes, such as amenity space;
  - c) It is undeveloped land and forms an integral to the character of an area;
  - d) The land is subject to the same deliverability issues as those already identified for allocated sites.
- The Authority has recently applied for planning permission on land in its ownership in Pembrokeshire County Council's planning area (ie outside by adjoining the National

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Park). Permission was granted for 75 dwellings (including 20% affordable housing) and this will contribute to the Council's 2012 Joint Land Availability Study.

- In the Local Development Plan the Authority has allocated land in Pembrokeshire County Council's ownership within the National Park which could contribute up to 285 dwellings, including 170 affordable units.

The housing market in Pembrokeshire is characterised like most of West Wales by a higher proportion of construction on small sites by local builders. This is demonstrated by a breakdown of figures from the 2011 Joint Housing Land Availability data. Fifteen percent of the total number of units within the land supply are on sites of less than 5 units. Sites of 5 or more units are listed in the study. The study lists 48 sites, 29 of which are allocated in the Local Development Plan. A further 19 sites are included because they have planning permission. Of these 19 sites eight have been included in the study for over 10 years. A further 7 have been included in the study for between 5 and 10 years, demonstrating the slow building rates. The slower rate of sales makes the market more readily suited to small / medium sized builders with a local labour force.

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

**Conclusion:** The outcome of the study into the deliverability of sites and the 2012 Joint Housing Land Availability Study will inform any requirement for a review of the housing land allocations in the Plan at the programmed 2014 Local Development Plan review.

| Policy Area  |   | Indicator 22  | Target   | Performance   |
|--|---|---|--|---|
| Policy 32  | W | The number of net additional affordable and general market dwellings built. (TAN 2) | 530 affordable dwellings over the plan period.<br><br>1000 general market dwellings built. In total an annual completion rate of 90 per annum. | Await Plan review 2014/15.<br><br> |
| <p><b>Trigger:</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.</p> <p><b>Reason:</b> Milestone contained in the Inspector's report on the Local Development Plan.</p> <p><b>Analysis:</b> As this element of the Plan is a key component of the Plan a commentary is provided here on progress to date.</p> <p>The target for affordable housing delivery in the Local Development Plan is 530 affordable houses over the Plan period with 80% of the provision planned for delivery by the end of the financial year 2014/2015 to be either built or under construction. This would mean that an estimated 228 affordable dwellings would need to have been built between 2007 and 2015 or be under construction. This would be an estimated 28 affordable dwellings to be completed annually to achieve the Plan's target provision. A total of 44 affordable dwellings were completed or under construction in the period 2007 to 2012 whereas a figure of 140 was anticipated. There is currently planning permission granted for a further 35 affordable dwellings in the National Park. During the monitoring period a total of 26 market dwellings were completed. No affordable dwellings were built during this period. Since the adoption of</p> |   |   |  |   |

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| Policy Area | Indicator 22 | Target | Performance   |
|-------------|--------------|--------|---|
|             |              |        | <p>the Local Development Plan, 63 market and 1 affordable dwelling(s) have been completed.</p> <p>This reflects in part the significant downturn in economic conditions since 2008, which is having a continuing impact on the housing market. Housing completions since 2009/10 have been significantly lower than the longer term average. Whilst completions in previous years averaged around 80 per year, the average since the start date of the Local Development Plan in 2007 is around 60 per year and since 2008 has dropped to around 50 per year. The Authority considers that the continuing depressed housing market has had a significant impact on housing development in Pembrokeshire. Many developers are choosing not to develop sites for this reason, rather than because of site specific deliverability issues. Developers also report difficulty in securing bank loans as a result of the economic situation and banking crisis as a factor limiting their ability to bring sites forward. Housing Associations ability to draw down Social Housing Grant has also been inhibited due to budget cuts.</p> <p>The analysis under indicator 21, above includes commentary on what actions the Authority are taking to address the situation. In addition the Authority's Scrutiny Committee has tasked itself with considering the effectiveness of the delivery of the Authority's policy on affordable housing against the original objectives and targets defined for that policy. It is intended that the Committee will report to the Authority in April 2013.</p> <p>It is encouraging, however that the emerging 2012 Joint Housing Land Availability Study shows an increase in the number of housing completions which will be included in the 3<sup>rd</sup> Annual Monitoring Report.</p> <p>Appendix 2 provides a commentary on progress with allocated sites.</p> <p><b>Overall supply for the Plan period:</b> Based on current completion rates there will be a surplus of housing land at the end of the Plan period. The Authority expects that, as with previous recessions, the market will become buoyant again and completion rates will increase. At present there is a healthy supply of housing land.</p> <p><b>Conclusion:</b> The annual average completion rate has been in decline in recent years. The overall target to build 1000 general market dwellings in the Plan period, at current rates of completion would not be possible. This is expected to change over the Plan period and reflects the current recession. Affordable housing delivery is consequently down as well.</p> |

| Policy Area | Indicator 23  | Target   | Performance     |
|-------------|---|--|-----------------|
|             | W Amount of development, including housing, permitted on allocated sites in the development plan as a % of development plan allocations and as % of total development permitted (ha and units). | Allocations – 100% permitted by the end of the Plan period on allocated sites. | Assess in 2014. |
|             | W And as a percentage of total development  | No target specified in the Plan.   |                 |

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| Policy Area   |  | Indicator 23 | Target | Performance |
|---|--|--------------|--------|-------------|
|   |  | permitted.   |        |             |
| <p><b>Trigger:</b> Failure to achieve 33% of the first target by the formal plan review period.</p> <p><b>Reason:</b> To allow land an opportunity to come forward means an assessment at this stage would be in appropriate.</p> <p><b>Analysis:</b> Assess in 2014.</p> <p><b>Conclusion:</b> Assess in 2014.</p> |  |              |        |             |

| Policy Area   |   | Indicator 24   | Target  | Performance   |
|---|---|--|---|---|
| Policy 44   | W | Average density of housing development permitted on allocated development plan sites.<br><sup>27</sup> | 30 per hectare target in the Plan Centres achieved. |  |
| <p><b>Trigger:</b> 2 or more housing developments not achieving 30 dwellings to the hectare.</p> <p>Reason: To make the best use of available land.</p> <p><b>Analysis:</b> Five sites within Centres for 2 or more dwellings have been given planning permission during the monitoring period. Of these, 3 sites were re-development sites in Tenby and included retail and commercial uses as well as residential and are therefore not included in this analysis.</p> <p>One site was replacement of a single dwelling with 2 new dwellings in Saundersfoot. The density of development is below 30/hectare but reflects the current pattern of development and increases the density on the site by doubling the number of units.</p> <p>Another application was for 3 units on a site in Trefin. The density is below the 30/Hectare requirement but the number of units was limited in this instance by highways and access constraints.</p> <p>A further 2 single dwellings were permitted within Centres both of which have slightly larger site areas than the equivalent of 30 per hectare. In one instance the site was within an existing housing development (0.05ha) and the other was at the edge of a Centre, within the curtilage of an existing dwelling and reflects the existing pattern of development (0.07ha)</p> <p>There have been 4 applications approved for single dwellings within Centres during the monitoring period. The site area in each case is larger than the equivalent density of 30 per hectare. Two of the sites are within existing housing developments and reflect the pattern of development established. A third site is well defined by roads and of insufficient size to accommodate more than a single dwelling and a fourth is within the curtilage of an existing property at the edge of a centre. This also reflects the existing pattern of development and is</p> |   |  |   |   |

<sup>27</sup> Policy 44 second last paragraph requires a density of 30 dwellings per hectare on housing developments in Centres not just on housing allocations.



| Policy Area   | Indicator 24 | Target | Performance |
|---|--------------|--------|-------------|
| <p>appropriate to its location.</p> <p>Sites for mixed developments have not been considered in this analysis.</p> <p><b>Conclusion:</b> No pattern is emerging to cause concern.</p> |              |        |             |

| Policy Area   | Indicator 25  | Target   | Performance   |
|---|---|--|---|
|   | Effectiveness of Policies (Policy 44 to 47) & Supplementary Planning Guidance (Affordable Housing, Low Impact Development making a Positive Contribution) when dealing with Applications and at Appeals | Inspector does not raise issues regarding the effectiveness of the policies or supporting supplementary planning guidance. |  |
| <p><b>Analysis:</b> In the period April 11 to March 12 one Inspector's decision refers to Policy 45 'Affordable Housing' where the appellant is seeking a change of use of a former hostel to 4 residential apartments, without affordable housing provision, claiming that the required 60% provision would be unviable. The Authority had questioned the purchase price of the property and also suggested that the proposed size/tenure of the apartments was inappropriate for Tenby's needs. The Inspector, dealing with the appeal on the basis that it was made, found that there was sufficient evidence to conclude that the proposal would not be viable if affordable housing units were provided. In the interests of enhancing the Conservation Area by developing a derelict building, the Inspector allowed the appeal.</p> <p>One appeal decision cited Policy 47 'Low Impact Making a Positive Contribution', this appeal was allowed as the Inspector's considerations of the criterion identified within the policy varied to the Authority's. Please see commentary under 'Context' for 'Visitor economy, employment and rural diversification' on the appeal decision at Coheston which referred to this Policy.</p> <p><b>Conclusion:</b> Whilst this provides a limited indication, Policy 45 has not been challenged. However the method used by the Authority for assessing affordable housing provision and the degree/type of information that is required for applications needs to be clarified. The Authority is currently seeking clarification on this matter from the Inspectorate.</p> <p>The Inspector did not challenge the criteria or application of Policy 47 in assessing low impact proposals. Further guidance from Welsh Government is awaited regarding One Planet Developments and it is anticipated that the Authority's Low Impact Making a Positive Contribution Supplementary Planning Guidance, only, will require review as soon as practicable.</p> |   |  |   |

## F. Community Facilities, Retailing and Transport

### Key outcomes

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


### Context

2.27 **Community Infrastructure Levy:** Community Infrastructure Regulations 2010 came into effect on 6th April 2010 (non-devolved). The Community Infrastructure Levy (CIL) Regulations 2010 (as amended by the Community Infrastructure Levy (Amendment) Regulations 2011) provide a transitional period after which planning obligations designed to collect pooled contributions from 5 or more developments may not be used to provide infrastructure which could be funded from Community Infrastructure Levy, or on the local adoption of the levy if this is before the end of the transitional period. However, when assessing whether five separate planning obligations have already been entered into for an infrastructure project or a type of infrastructure, local planning authorities will need to look back over agreements that have been entered into since 6th April 2010. Analysis in Appendix 3 shows that this threshold has not been reached to date – there have been three such approvals since the 6<sup>th</sup> of April 2010. In the longer term the preparation of a Community Infrastructure Levy will be heavily dependent on the County Council as the service provider. Raising awareness and liaising with the Council will be essential. Local Planning Authorities can continue to pool such contributions until 6th April 2014.

2.28 Affordable housing is currently not specified as infrastructure and is therefore outside the remit of Community Infrastructure Levy. Affordable housing should continue to be sought through S106 obligations. No change is needed to the Local Development Plan. Further guidance is awaited from Welsh Government and the approval of pooled contributions will continued to be monitored.

2.29 **Retailing:** The Welsh Government Enterprise and Business Committee has consulted on regeneration in town centres. The closing date was September 2011. A future Local Development Plan Annual Monitoring Report will need to consider the significance of any amendments to national planning policy and revisions to the Local Development Plan as appropriate.

### Policy Performance

| Policy Area                       | Indicator 26   | Target                                 | Performance   |
|-----------------------------------|--|--|---|
| Community Facilities<br>Policy 48 | Number of approvals for loss of community facilities | 0 unless justified by policy framework |  |

**Trigger:** 1 or more community facilities lost contrary to recommendation.


**Reason:** Communities facilities are important to community sustainability.

**Analysis:** On applications determined between 1<sup>st</sup> April 2011 and 31<sup>th</sup> March 2012 linked to Policy 48 there was 1 application approved for loss of community facilities. Appendix 3 provides a list of planning obligations secured to date.

The applicant proved that there was no longer a need for the facility proposed and therefore its loss was justified.

Commentary is provided on sites allocated for community facilities in Appendix 2.

**Conclusion:** No need to review.


| Policy Area                       |  | Indicator 27   | Target   | Performance   |
|-----------------------------------|--|--|--|---|
| Community Facilities<br>Policy 48 |  | Number of Planning Obligations for community facilities secured from development. (or financial contributions) | S106 agreements secured in line with Supplementary Planning Guidance |  |

**Trigger:** More than 2 applications decided contrary to the recommendation.

**Reason:** To improve improvement in community facility provision.

**Analysis:** There have been no applications decided contrary to recommendation during the monitoring period.

**Conclusion:** There are no issues arising.

| Policy Area |   | Indicator 28   | Target   | Performance   |
|-------------|---|--|--|---|
|             | W | Amount of greenfield and open space lost to development (ha) which is not allocated in the plan. | Greenfield - 0 % except for exceptional land released for affordable housing or community facility provision.<br><br>Open Space lost - 0 % except where, with playing fields, facilities can be best retained and enhanced through the redevelopment of a small part of the site or alternative provision can be made of equivalent benefit or there is excess provision in the area.) |  |

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**Trigger:** 1 or more inappropriate developments granted permission contrary to recommendation in any one year.


**Reason:** The cumulative loss of green field land should be assessed to ensure that opportunities for brownfield development are not being overlooked. This is also a Welsh Government indicator.

**Analysis:** Twenty-four applications were approved which included the development of greenfield land during the monitoring period. This amounted to the development of 1.16ha of greenfield land.

Of the 10 applications:

- 2 were for photo-voltaic panels;
- 3 were for individual wind turbines;
- 6 were related to existing farms and were for new agricultural buildings or extensions to farm yards;
- 5 were for stables;
- 2 were for facilities linked to stables;
- 3 were for the extension of curtilages to existing dwellings;
- 1 was for the extension of a existing clubhouse within a sports field and linked to the use of the field;
- 1 was for a hydro-electric scheme;
- 1 was for a car park at a National Trust property to improve traffic management within the site.
- 1 was for a dwelling in the countryside which was approved contrary to Officer recommendation. Members felt that permission should be granted as the plot was considered to not be in the open countryside as the land was not agricultural land and it was currently used as recreational space with a garage.


**Conclusion:** Other than the application for the dwelling approved contrary to Officer recommendation, these applications were approved in accordance with the Local Development Plan policies. The application approved contrary to Officer recommendation was referred to the Welsh Government but it was concluded that they would not call in the application for determination as it was a local matter. Given this outcome it is concluded that the indicator continues to be monitored and that no further action is possible at this time.


| Policy Area   | Indicator 29   | Target   | Performance   |
|---|--|--|---|
| W   | Amount of greenfield and open space lost to development (ha) which is not allocated in the plan. | Open Space lost - 0 % except where, with playing fields, facilities can be best retained and enhanced through the redevelopment of a small part of the site or alternative provision can be made of equivalent benefit or there is excess provision in the area. |  |
| <p><b>Trigger:</b> 1 or more inappropriate developments granted permission contrary to recommendation in any one year.</p> <p><b>Reason:</b> The loss of open space unless justified leads to the undermining of the sustainability</p> |  |  |   |

of local communities. This is also a Welsh Government indicator.


**Analysis:** There has been one application approved during the monitoring period (2011 to 2012) which will result in the loss of 0.02ha of open space. The application was for the extension of the club on a sports field. This use is linked to the use of the open space and not contrary to the policies of the Local Development Plan.

**Conclusion:** No issues arising.


| Policy Area  |  | Indicator 30                             | Target               | Performance   |
|--|--|--|----------------------|---|
| Retail<br>Policy 48  |  | Percentage of vacant retail floor space. | No greater than 10%. |  |
| <p><b>Trigger:</b> Greater than 10% vacant A use class floorspace within retail centres for 2 consecutive years.</p> <p><b>Reason:</b> Vacancy in centres naturally fluctuates and allows for new ventures to come forward. Sustained relatively high vacancy for National Park centres should be assessed further.</p> <p><b>Analysis:</b> Across the centres of Tenby, Saundersfoot, St Davids, Solva and Newport, and for all A use class units, the average vacant floorspace is 5.1% at 2011. This is below the national average of 13.4%<sup>28</sup> and demonstrates vibrant centres. The next survey is due in 2013.</p> <p><b>Conclusion:</b> No issues arise regarding the vibrancy of the Park's retail centres.</p> |  |  |                      |   |

| Policy Area  |  | Indicator 31   | Target | Performance   |
|--|--|--|--------|---|
| Transport<br>Policy 51   |  | Approvals for development without providing appropriate access for vehicles, cyclists and pedestrians. | 0      |  |
| <p><b>Trigger:</b> 1 or more developments approved contrary to Policy 51 recommendation in any one year.</p> <p><b>Reason:</b> These are essential for developments to go ahead.</p> <p><b>Analysis:</b> There have been no developments given planning permission without providing appropriate access for vehicles, cyclists and pedestrians.</p> <p><b>Conclusion:</b> There are no issues arising.</p> |  |  |        |   |

<sup>28</sup> British Retail Consortium survey published 22 Aug 2011 <http://www.bbc.co.uk/news/business-14611592>

| Policy Area  |  | Indicator 32  | Target | Performance   |
|--|--|---|--------|---|
| Policy 52  |  | Approvals for development causing significant concerns regarding potential transport impacts. | 0      |  |
| <p><b>Trigger:</b> 1 or more applications approved causing significant traffic impact concerns</p> <p><b>Reason:</b> Significant concerns will impact on communities and will require assessment.</p> <p><b>Analysis:</b> The Highway Authority is routinely consulted on planning applications. There have been no applications approved causing significant concerns regarding potential transport impacts during the monitoring period</p> <p><b>Conclusion:</b> There are no issues arising.</p> |  |   |        |   |

| Policy Area  |  | Indicator 33  | Target  | Performance            |
|--|--|---|---|------------------------|
| Waste  |  | Amount of waste management capacity permitted expressed as a percentage of total capacity required, as identified in the Regional Waste Plan. | 1.5 hectares or 100% (if not provided for outside the National Park in conjunction with Pembrokeshire County Council's provision. | Assess in 2014 review. |
| <p><b>Trigger:</b> Application/s approved for 50% provision (0.75 hectare) by first formal review – 2014.</p> <p><b>Reason:</b> Significant concerns will impact on communities and will require assessment.</p> <p><b>Analysis:</b> Assess in 2014 review.</p> <p><b>Conclusion:</b> Assess in 2014 review.</p> |  |   |   |                        |

| Policy Area   |  | Indicator 34   | Target  | Performance   |
|---|--|--|---|---|
|   |  | Effectiveness of Policies (Policy 48 to 56) & Supplementary Planning Guidance (Planning Obligations) when dealing with Appeals | No issues arise from any appeal decisions regarding the effectiveness of the Plan's policies. |  |
| <p><b>Analysis :</b> In the period April 11 to March 12, one appeal decision cited Policy 48 and one cited Policy 50.</p> |  |  |   |   |

In an appeal for the change of use from a former hostel to 4 residential units, the Inspector did not agree with the Authority that the loss of a community facility had occurred, under Policy 48, noting that no specification on what constitutes a “community facility” exists within this policy. The Inspector concluded that the Authority had not adequately supported this view and thus saw no conflict with the policy. Whilst the Inspector did not challenge or question the policy, the Authority clearly needs to provide more evidence to support and justify the view that a proposal is contrary to Policy 48, in future applications and appeals.

In the other appeal, the applicant appealed against a refusal of permission for a change of use from A1 use class to A2 use class within a Primary Retail Frontage under Policy 50 ‘Town and District Shopping Centres’. The Inspector supported this decision and dismissed the appeal, finding that the proposal would dilute the retail character of Tenby’s primary frontage. This appeal was also referred to in the previous monitoring report from September 10 to July 11.

**Conclusion:** Whilst in both cases limited indication is available, in relation to Policy 48, the Authority will seek to clarify what justification/evidence base will be required to support a view that a proposal is contrary to Policy 48, to aid future applications and appeals. Policy 50 appears to be effective.

### 3. Sustainability Appraisal Monitoring

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

| Objective Number | Sustainability Objective   |
|------------------|--|
| 1                | <p><b>Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.</b></p> <p>As with the 2011 Monitoring Report, it is difficult to assess the economic state of the agricultural and an allied sector as limited comparable data has been released to date. Labour Force Survey (2008) suggested that the medium trend (since 2001) for employment rates in agriculture, forestry and fishing in Pembrokeshire is increasing. However, there was a slight reduction in employment rates in these areas during 2009 and this may be indicative of the beginning of the economic recession the United Kingdom is currently experiencing. More up to date labour force data would be required to fully measure this impact.</p> <p>In 2011 Pembrokeshire County Council released “The State of Wildlife in Pembrokeshire”, there have been no further updates to this report to inform this 2012 Monitoring Report. The report suggests that biodiversity associated with agriculture is generally in decline (though there are some improvements in arable habitats).</p> <p>Overall the information available suggests that the trend for growth in the agricultural sector that has been experienced in the past may have been to the detriment of biodiversity. However, there is evidence to suggest that within the National Park the condition of biodiversity features on agricultural land may be more favourable due to many long term management agreements with farmers/ landowners as well as the significant land holdings of the National Trust and Ministry of Defence.</p> |
| 2                | <p><b>Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.</b></p> <p>Progress towards this objective within the context of the Local Development Plan will be the result of maintaining or improving community facilities, and refusing planning applications for residential development in remote areas or areas with poor community infrastructure. One approval for a residential development in a remote location during this monitoring period was given, contrary to Local Development Plan Policy 52 on Sustainable Transport.</p> <p>Achievement of this Sustainability Objective will depend largely on activity outside the Local Development Plan. At this early stage it is difficult to determine if the Local Development Plan is positively or negatively contributing to the progress of this objective, the commentary for Sustainability Appraisal Objective 13 indicates that generally community facilities are being retained.</p>  |
| 3                | <p><b>Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology) with reference to the special qualities of the National Park.</b></p> <p>Tranquillity mapping carried out by the Countryside Council for Wales in 1997 and 2009 suggests that the National Park is becoming a more disturbed</p>   |



| Objective Number | Sustainability Objective   |
|------------------|--|
|                  | <p>place, largely due to increased impact of road traffic. There have been no updates to this data during this monitoring period for comparison.</p> <p>Proposals for the re-development of the Gatehouse and associated sites still stand and should make a positive contribution to the townscape of Tenby when completed.</p> <p>During this monitoring period the National Park Authority, in conjunction with partners BT and Western Power, delivered three landscape improvement schemes in iconic locations within the National Park. These schemes involved the removal of overhead cabling for replacement with underground cabling. Locations for these schemes were chosen to maximise benefits to the landscape, these locations were: West Angle, St. Nons and Martin's Haven.</p> <p>The adoption of Landscape Character Assessment Study (July 2011) and Conservation Areas (October 2011) Supplementary Planning Guidance has helped to identify suitable enhancements as well as developments that would be out of character with the landscape or townscape of the National Park.</p> <p>Long term concerns about changes in landscape quality are part of the rationale of this objective, application of the Local Development Plan and projects outside the planning process suggest positive progress towards this objective.</p> |
| 4                | <p><b>Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.</b></p> <p>The role of the Local Development Plan in meeting this objective is likely to be restricted to its role in determining applications proposing development to support such activity, and securing planning obligations to develop cycleways or footpaths. Policy 52 requires new development to include appropriate access for walkers and cyclists.</p> <p>Since the adoption of the Local Development Plan no applications that would require or generate provision for walkers and cyclists have been determined, so as yet it is not possible to assess how the Local Development Plan is contributing towards this objective.</p>  |
| 5                | <p><b>Increase the number of visitors using the National Park outside the peak visitor season.</b></p> <p>Progress in this Sustainability Appraisal Objective is largely dependent on activities beyond the influence of the Local Development Plan i.e. an increase in visitor numbers out of season is more likely to come about as a result of the marketing strategies employed by the tourism sector. However, the Local Development Plan may assist in increasing and improving visitor accommodation through planning approvals. The goals of the visitor economy policies (creating accommodation suited to year round use, whilst not increasing the overall provision) will help to do this.</p> <p>Approvals for self catering accommodation since adoption of the plan help meet the aim to improve the suitability of accommodation for year round use, though they also increase the overall provision. Therefore the planning</p>   |

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| Objective Number | Sustainability Objective  |
|------------------|---|
|                  | contribution to this Sustainability Objective can be seen as mixed. During this monitoring period four approvals for two or more self catering holiday lets were given.   |
| 6                | <p><b>Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.</b></p> <p>The Local Development Plan will contribute towards this objective primarily by not adding to the amount of infrastructure at risk from fluvial/ coastal flooding. No planning permissions to create new infrastructure in areas predicted to be effected by sea level rise of up to two metres were approved during this monitoring period (1st April 2011 – 31st March 2012).</p>  |
| 7                | <p><b>Reduce factors contributing to climate change.</b></p> <p>Emissions of greenhouse gases resulting from activities within the National Park that could be influenced by the Local Development Plan are centred on domestic, commercial and road transport. Local authority estimates by the Department for Energy and Climate Change (DECC) for Pembrokeshire (2005-2009) (Released 15/09/2011) suggest that per capita rates of CO<sub>2</sub> for Industrial/ Commercial, Domestic and Transport remained consistent between 2005 and 2009 with a slight increase in Industrial/commercial emissions between 2008 and 2009. The latest estimates for 2011 from DECC (whole UK, release March 2012) suggest that CO<sub>2</sub> emissions for industrial/commercial and residential sectors have decreased between 2010 and 2011, with the greatest decrease in the domestic sector (22%). Transport emissions have remained steady since 1990, however, they are currently thought to be at lowest since 1992. It is likely that the reduction in residential emissions is due to the warmer winter experienced in 2011 (2.1 degrees Celsius and 4.1 degrees Celsius for the first and last quarters of the year compared to 2010), which reduced the need for energy for heating. Additionally, some reductions in CO<sub>2</sub> emissions may be due to the current economic situation, reduced development and various businesses activities, along with rising energy costs.</p> <p>The Code for Sustainable Homes (and the Welsh Government additional requirement for energy efficiency) should lead to energy efficiency improvements in new builds within the National Park. Policy 29 has had to be reviewed (see Chapter 2 C). This will limit the positive impact that can be made under this objective. The increasing number of proposals for renewable energy schemes that have been approved since adoption of the Local Development Plan will help reduce domestic and commercial CO<sub>2</sub> emissions.</p> <p>Progress towards this Sustainability Objective is being made, and is likely to accelerate with increasing adoption of renewable technologies and improvements to the housing stock. During the monitoring period, 26 renewable energy schemes have received planning approval with many more awaiting a planning decision.</p> |

| Objective Number | Sustainability Objective   |
|------------------|--|
| 8                | <p><b>Maximise the contribution of the limited opportunities for development to sustaining local communities.</b></p> <p>Provision of affordable housing within the National Park is currently falling short of the target set in the Local Development Plan.</p> <p>0.46ha employment land was lost (but only on a temporary basis – see analysis under Indicator 17) during the monitoring period, no new employment land has come forward. The effect on the Sustainability Objective is neutral.</p>   |
| 9                | <p><b>Encourage access for all to the National Park, reflecting the social mix of society.</b></p> <p>Meeting this objective is likely to be the result of efforts outside the application of the Local Development Plan. Policy 39 may lead to the conversion of cheaper forms of accommodation to more expensive forms, which would not help in meeting this objective. During the monitoring period (April 1st 2011 and March 31st 2012) no application linked to this policy was approved or refused.</p>  |
| 10               | <p><b>Maintain the cultural distinctiveness of communities.</b></p> <p>This Sustainability Objective covers the breadth of aspects that contribute to the unique character and cultural distinctiveness of the National Park.</p> <p>Within the context of the Local Development Plan, achievements towards this objective will be twofold. Firstly the Local Development Plan will be able to contribute towards the objective by helping to ensure that people who grew up in the National Park are able to have the opportunity to continue living here once they are adults by sustaining local communities and enabling access to employment (see comments under SA Objective 8).</p> <p>Secondly, the Local Development Plan will be able to contribute to the objective by helping to maintain and enhance culturally significant built environment and natural environment features.</p> <p>In terms of maintaining listed buildings less than 10% are identified as being at any degree of risk. There seems to be significant potential for the uses of listed buildings to change - 7 listed building permissions for change of use granted between 1 April 2010 and 30 June 2011, 3 permissions granted between August and December 2011, with one further permission for a listed building conversion granted between January 1<sup>st</sup> and March 31st 2012.</p> |
| 11               | <p><b>The adverse effects of minerals exploitation in the National Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.</b></p> <p>An extension to Trefigin Quarry, within the National Park, was approved in October 2011. This scheme was approved under the policies of the Joint Unitary Development Plan, in which the Authority committed to maintaining a joint land bank with Pembrokeshire County Council.</p> <p>The effect on the Sustainability Objective is negative as the objective looks to decrease minerals exploitation and its associated impacts within the National Park. However, this is not indicative of the effectiveness of the Local Development Plan as the scheme was approved under the Joint Unitary</p>   |

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| Objective Number | Sustainability Objective  |
|------------------|---|
|                  | <p>Development Plan.</p> <p>New quarries or extensions to existing ones are less likely to occur in the future as the Authority has chosen not to maintain land bank. Additionally, as part of the planning approval for Trefigin Quarry a robust restoration scheme was secured to bring the land back into good condition for agriculture or biodiversity once the site is no longer in use. In the long term this may help to reduce any residual negative impacts on landscape and biodiversity.</p>  |
| 12               | <p><b>Reduce the negative impacts of waste.</b></p> <p>Active waste facilities in the National Park are limited to public amenity sites in Tenby and near St Davids.</p> <p>The percentage of waste reused, recycled or composted across Pembrokeshire was 48.9% in 2010/11, this figure is part of a consistent pattern of increasing levels of reuse, recycling and composting.</p> <p>Incidents of recorded fly-tipping in Pembrokeshire have fallen by 13% since 2007, with an 8.5% decrease between 2010 and 2011.</p>   |
| 13               | <p><b>Community facilities (including health &amp; social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population.</b></p> <p>Generally speaking community facilities are being retained, and given that the population is believed to be declining at a slow rate, it is reasonable to assume that the provision of an adequate level of facilities has been maintained. However, one planning approval was given for the change of use of conference facilities to holiday accommodation units. The applicant proved that there was no longer a need for the facility proposed and therefore its loss was justified. Further monitoring will be required to assess the effectiveness of the Local Development Plan in this area.</p>  |
| 14               | <p><b>Maintain and enhance biodiversity both within and outside designated sites</b></p> <p>The State of Wildlife in Pembrokeshire report published in 2011 contains the following key observations:</p> <ul style="list-style-type: none"> <li>• Otter numbers and sites with threelobed water-crowfoot are increasing.</li> <li>• The condition of heathland and coastal cliffs and slopes has improved on selected sites.</li> <li>• Southern damselfly, skylark, yellowhammer and starlings are particularly under threat.</li> <li>• The condition of grassland and hedgebanks are generally declining in the wider environment.</li> <li>• The status of dormice and marsh fritillaries is unclear and further research is required.</li> </ul> <p>These observations suggest that while there are success stories and areas of optimism, the condition of biodiversity in the area is cause for concern. The observations regarding grassland and hedgebanks is particularly relevant as these habitats comprise over half of the National Park area. Hedgebank decline is linked to landuse change, nutrient enrichment, chemical sprays, over-intensive management, and invasive non-native species. Grassland decline is associated with intensification and changes in grazing management. On a more positive note there is reason to believe that the</p> |

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| Objective Number | Sustainability Objective  |
|------------------|---|
|                  | <p>long term decline of habitats associated with arable farming has been arrested and in recent years improvements have been seen.</p> <p>These observations cover the whole of Pembrokeshire, and it is possible that the situation in the National Park is better, due to the significant land holdings of the National Trust and Ministry of Defence.</p> <p>Within the scope of the Local Development Plan effects to biodiversity occur as the result of the loss of connectivity between habitats e.g. loss of hedgerows, or through the outright loss of habitats due to development pressure. All planning applications are tested for accordance with Local Development Plan Policy 11 'Protection of Biodiversity', between April 1st 2011 and March 31st 2012. No developments have received planning approval that were not compatible with this policy. Additionally, at least 4 developments have been approved that have included biodiversity enhancements beyond any mitigation required as part of planning conditions, demonstrating that the Local Development Plan is making a positive contribution to the SA Objective.</p>  |
| 15               | <p><b>Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.</b></p> <p>Consultation responses from Dwr Cymru during the production of the Local Development Plan suggest that there are no concerns regarding the availability of water resources for existing or planned demand. There is concern in that much of the sewerage infrastructure in the National Park is at or near capacity. Further information on this should come forward when the report on the deliverability of sites is prepared for the Authority.</p> <p>There are 12 blue flag beaches in the National Park in 2012 (one less than 2011), and a further 15 (13 in 2011) green coast award winning beaches (covering more remote, rural beaches).</p> <p>Supporting data for the Western Wales River Basin Management Plan<sup>29</sup> identifies 31 km of river and stream stretches in the National Park to be of a 'Good' overall status, 105.5 km to be of 'Moderate' overall status, and 8 km (the Nyfer river between Nant Duad and the coast, and the Ritec river (also outside the National Park)) to be of 'Poor' overall status. 0.12 km<sup>2</sup> of lake in the National Park is identified as of 'Good' overall quality (Rosebush reservoir) and 0.34 km<sup>2</sup> as of 'Moderate' overall quality (Bosherston Lily Ponds). This data is expected to be updated in December 2012 and will be included in the third annual monitoring report.</p> |

<sup>29</sup> Environment Agency, <http://www.environment-agency.gov.uk/research/planning/125095.aspx>  
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## Appendix 1 Supplementary Planning Guidance

|     | Title  | Status   |
|-----|--|--|
| 1.  | <b>Building Extensions</b>                                   | WITHDRAWN - Adopted June 2011 Withdrawn in light of evidence regarding implementing this element of Policy 29. See analysis at paragraph 2.19 on page 17 of the main report. |
| 2.  | <b>Loss of Hotels</b>  | Adopted June 2011  |
| 3.  | <b>Planning Obligations</b>                                  | Adopted June 2011  |
| 4.  | <b>Sustainable Design</b>                                    | Adopted June 2011  |
| 5.  | <b>Landscape</b>   | Adopted June 2011  |
| 6.  | <b>Safeguarding Mineral Zones</b>                            | Adopted June 2011  |
| 7.  | <b>Coal Works – Instability</b>                              | Adopted June 2011  |
| 8.  | <b>Parking</b>   | Adopted June 2011  |
| 9.  | <b>Archaeology</b>   | Adopted June 2011  |
| 10. | <b>Affordable Housing</b>                                    | Adopted March 2011. Review in light of the County Council's housing allocations policy and the Welsh Local Government's research on mortgage lending.<br><br>Both awaited    |
| 11. | <b>Validation – Interim Statement</b>                        | WITHDRAWN - Adopted October 2009/Last update October 2011.<br><br>Withdrawn due to the publication of Welsh Government advice on validation in 2012.                         |
| 12. | <b>Conservation Area Statements</b>                          | Adopted October 2011   |
| 13. | <b>Regionally Important Geodiversity Sites</b>               | Adopted October 2011   |
| 14. | <b>Renewable Energy</b>                                      | Adopted October 2011   |
| 15. | <b>Renewable Energy Addendum (dealing with Solar Arrays)</b> | Adopted June 2012  |
| 16. | <b>Shopfront Design</b>                                      | Adopted October 2012   |
| 17. | <b>Low Impact Development Making a Positive Contribution</b> | Adopted May 2006. Requires review. Awaiting Welsh Government Practice Guidance which is due in October 2012  |

|     | <b>Title</b>   | <b>Status</b>                     |
|-----|--|-----------------------------------|
| 18. | <b>Recreational Activities</b>   | Consultation closing October 2012 |
| 19. | <b>Siting and design of new farm buildings</b>   | Adopted June 2012                 |
| 20. | <b>Accessibility (advice on how proposals need to consider the availability of public transport)</b> | Consultation closing October 2012 |

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

## Appendix 2 Site Specific Monitoring

**Table 1 Allocations of Employment/Mixed Use Sites**

| Location/<br>Proposals<br>Map ID | Site Name  | Proposed Use  | Monitoring   |
|----------------------------------|--|---|--|
| Broad Haven<br>MA776             | Land at Broad Haven north east of Marine Road        | Mixed (Residential, Workshops & Community Facility) | Not implemented. Site constraints to be assessed as part of study being commissioned by the National Park Authority in September 2012 for completion in February 2013.   |
| Manorbier<br>Station<br>MA895    | Land part of Buttylands, Manorbier Station           | Mixed (Residential/<br>Education)                   | Not implemented. Site constraints to be assessed as part of study being commissioned by National Park Authority in September 2012 for completion in February 2013. Land owners have employed agent to investigate submitting a planning application for the residential development element of the site. |
| Newport<br>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.  |
| Saundersfoot<br>MA777            | Rear of Cambrian Hotel, Saundersfoot                 | Mixed (Residential, Retail & A3 Pub)                | Renewal of applications received for redevelopment of hotel site. Not yet determined.  |
| St David's<br>EA748              | South of St Davids Assemblies                        | Employment B1, B8, Local Waste Management Facility  | Not implemented.   |
| St David's<br>MA746              | Between Glasfryn Road and Millard Park, St Davids    | Mixed (Live/Work Units)                             | Not implemented.   |
| St Ishmael's<br>MA733            | Adjacent to School, St Ishmaels                      | Mixed (Residential/<br>Education)                   | Not implemented. Site constraints to be assessed as part of study being commissioned by NPA in September 2012 for completion in February 2013.   |
| Tenby<br>MA706                   | Upper Park Road, Tenby                               | Mixed (Residential & Retail)                        | This allocation was granted permission in part under NP/11/065 – 29 <sup>th</sup> July 2011. The permission relates to part of the allocation site and an additional area. The permission is for demolition, the   |



| Location/<br>Proposals<br>Map ID | Site Name                            | Proposed Use  | Monitoring  |
|----------------------------------|--------------------------------------|---|---|
|                                  |                                      |   | construction of 5 commercial units with 14 residential units (12 affordable). The permission is linked to permissions also granted on MA707. A start on site is anticipated in September 2012.  |
| Tenby MA707                      | White Lion<br>St/Deer Park,<br>Tenby | Mixed (Residential,<br>Retail, Hotel and<br>Cinema) | 3 permissions granted 29 <sup>th</sup> July 2011. <sup>30</sup><br>Includes 39 apartments, 68 bed hotel, 3 commercial units, replacement cinema, self catering hotel suites and 9 dwellings. Viability testing for the delivery of affordable housing and planning obligations was carried in conjunction with NP/11/65. The expectation of 60% affordable housing was not realized for two principal reasons:<br><br>- The relatively high existing-use value.<br><br>- The high density of the development. High density development generally delivers lower residual values than lower densities. |
| Tenby MA710                      | Sergeants<br>Lane, Tenby             | Mixed (Residential,<br>Workshops & Retail)          | Not implemented and no pre-application discussions have taken place.  |

**Table 2 Allocations of Housing Sites**

| Location    | Proposals<br>Map ID | Site Name                   | Monitoring   |
|-------------|---------------------|-----------------------------|--|
| Broad Haven | HA734               | South of<br>Driftwood Close | Not implemented. Site constraints to be assessed as part of study being commissioned by the National Park Authority in September 2012 for completion in February 2013.   |
| Crymych     | HA750               | Depot Site                  | Pembrokeshire County Council, as landowners, put site up for auction in January 2012 but failed to sell. Several enquiries since have been for alternative uses of the site, but no pre-application enquiries to date. |

<sup>30</sup> NP/11/064, NP/11/066 and NP/11/68

| Location          | Proposals |                               | Monitoring   |
|-------------------|-----------|-------------------------------|--|
|                   | Map ID    | Site Name                     |  |
| Dale              | HA382     | Castle Way                    | Not implemented. Site constraints to be assessed as part of study being commissioned by the National Park Authority in September 2012 for completion in February 2013. |
| Dinas Cross       | HA387     | Opposite Bay View Terrace     | Not implemented. Site constraints to be assessed as part of study being commissioned by National Park Authority in September 2012 for completion in February 2013.     |
| Herbrandston      | HA732     | East of Herbrandston Hall     | Not implemented. Site constraints to be assessed as part of study being commissioned by National Park Authority in September 2012 for completion in February 2013.     |
| Jameston          | HA436     | North of Landway Farm         | Reserved matters application submitted July 2011 NP/11/273 (5 units plus 1 affordable). Plots for sale but none implemented to date.                                   |
| Jameston          | HA730     | Opposite Bush Terrace         | Not implemented. Site constraints to be assessed as part of study being commissioned by National Park Authority in September 2012 for completion in February 2013.     |
| Jameston          | HA821     | Green Grove                   | Not implemented. Site constraints to be assessed as part of study being commissioned by National Park Authority in September 2012 for completion in February 2013.     |
| Lawrenny          | HA559     | Adjacent Home Farm            | A design competition for an eco- village on this site was won by Tom Russell Architects in 2008. No pre-application discussions have taken place.                      |
| Manorbier Station | HA848     | Field opp Manorbier VC School | Not implemented. Site constraints to be assessed as part of study being commissioned by National Park Authority in September 2012 for completion in February 2013.     |
| New Hedges        | HA813     | Rear of Cross Park            | Pre application discussions currently taking place regarding access to the site with the intention of submitting an outline application.                               |
| Newport           | HA825     | North of Feidr Eglwys         | Results of archaeological investigations have not revealed constraints to development. Landowner has indicated   |

| Location   | Proposals |                                | Monitoring   |
|------------|-----------|--------------------------------|--|
|            | Map ID    | Site Name                      |  |
|            |           |                                | intentions of making a planning application with lower number of affordable housing units but no application made, to date.  |
| Solva      | HA384     | Adjacent to Bro Dawel          | Not implemented. Site constraints to be assessed as part of study being commissioned by National Park Authority in September 2012 for completion in February 2013. |
| Solva      | HA792     | Bank House, Whitchurch Lane    | Not implemented. Site constraints to be assessed as part of study being commissioned by National Park Authority in September 2012 for completion in February 2013. |
| St David's | HA385     | North of Twr-y-Felin           | The site continues to be implemented under the original permission.  |
| St David's | HA737     | St Davids West Glasfryn Road   | Not implemented. Site constraints to be assessed as part of study being commissioned by National Park Authority in September 2012 for completion in February 2013. |
| St David's | HA789     | Adj Ysgol Bro Dewi, Nun Street | Not implemented.   |
| Tenby      | HA377     | Brynhir                        | Not implemented. Site constraints to be assessed as part of study being commissioned by National Park Authority in September 2012 for completion in February 2013. |
| Tenby      | HA723     | former cottage Hospital Site   | Site sold by Pembrokeshire County Council to private landowner in Spring 2012. No discussions have taken place on this site since the sale.                        |
| Tenby      | HA724     | Rectory Car Park               | Not implemented. Site constraints to be assessed as part of study being commissioned by National Park Authority in September 2012 for completion in February 2013. |
| Tenby      | HA727     | West of Narberth Road          | Not implemented. Site constraints to be assessed as part of study being commissioned by National Park Authority in September 2012 for completion in February 2013. |

| Location | Proposals<br>Map ID | Site Name                   | Monitoring   |
|----------|---------------------|-----------------------------|--|
| Tenby    | HA752               | Butts Field Car park, Tenby | Not implemented. Site constraints to be assessed as part of study being commissioned by National Park Authority in September 2012 for completion in February 2013. |
| Tenby    | HA760               | Reservoir Site, Tenby       | Not implemented. Site constraints to be assessed as part of study being commissioned by National Park Authority in September 2012 for completion in February 2013. |
| Trefin   | HA738               | North of Heol Crwys         | Not implemented.   |

**Table 3 Community Facilities**

| Site Ref | Site Name & Location                             | Use      | Monitoring   |
|----------|--|----------|--|
| CP829    | Land at Saundersfoot Railway Station, Pentlepoir | Car park | Some pre application discussions have taken place. |
| CP828    | Manorbier Station                                | Car park | No pre-application discussions have taken place.   |

**Table 4 Road & Cycle Schemes**

| Scheme Number | Road/Cycle Schemes                                | Monitoring   |
|---------------|---|--|
| RI1           | New House Bridge Improvement A4075                | Not implemented. No progress to date   |
| RI2           | Shared Use Path south of Carew Castle             | Actively working to achieve a satisfactory design which will involve a displacement of the carriageway to the east to create sufficient space for the path within highway limits on the west side. Issues relating to a tree, bats, drainage, road capacity, crossings and potential land encroachment on the east side of the road are being considered. Discussions have taken place with Pembrokeshire Coast National Park Authority's Building Project's Officer regarding visibility from the Castle Car Park access. |
| RI3           | St Petrox Bends Improvement                       | Not implemented. Possibility of piecemeal improvements using road safety funding. No progress to date.   |
| RI4           | Fan Road/B4316 Junction Improvement, Saundersfoot | Not implemented.   |
| RI5           | Gumfreston to Tenby Phase 3                       | Funding available but tidal modelling by consultant required as road subject to inundation. Consideration being given to providing advance automatic flood warning signs in place of complex major improvement.  |
| RI6           | Glasfryn Lane, St Davids                          | Not implemented. Pembrokeshire County Council has aspirations for the road to be widened for traffic management purposes in the City but has advised that it expects the works to be funded through the development of the land allocated along the road for housing and employment purposes. Topographical surveys complete and process of commissioning environmental scoping studies underway. No programme set as yet for construction.  |

| Scheme Number | Road/Cycle Schemes  | Monitoring   |
|---------------|---------------------|--|
| RI7           | A40 Canaston Bridge | Scheme completed and road opened on 16 <sup>th</sup> March 2011. |



## Appendix 3 Planning Obligations

| Planning Ref          | Location   | Proposal  | Date signed by all parties | Clause description  | Financial sum agreed | Payment received date | Spend date              | Notes   |
|-----------------------|--|---|----------------------------|---|----------------------|-----------------------|-------------------------|---|
| NP/04/333 & NP/03/455 | Land on north east side of The Incline, The Ridgeway, Saundersfoot | Residential development                                       | 27.04.05                   | Transportation  | £10,000.00           | 18.04.05              | various dates 2006/2007 | Towards cost of the Council carrying out traffic calming roadworks and maintaining the works in its capacity of Highway Authority. Total spend £12931.63 - S Benger confirmed works complete - File closed. |
| NP/04/616             | Rhodewood House, Saundersfoot                                      | Pay Council upon commencement of the development              | 03.06.05                   | Contribution towards Affordable Housing within the community of Saundersfoot. | £100,000.00          | 16.08.06              | 09.07.09                | Payable towards the provision of affordable housing within the community of Saundersfoot - Pembrokeshire Housing have purchased No 63 Vineyard Vale, S/foot.  |
| NP/05/570 & NP/03/225 | South Hook LNG   |   | 05.04.06                   | Nature conservation - see agreement.  | N/A                  | N/A                   | N/A                     |   |
| NP/06/167             | Land at Glanrhyd House, Glanrhyd                                   | Erection of 4 dwellings, access road and private sewage works | 26.06.07                   | Sale of land to RSL - 1 unit provided for rent or shared ownership            | N/A                  | N/A                   | N/A                     | See agreement   |
| NP/06/518             | Land to rear of Maescynon,   | Residential development                                       | 27.06.07                   | One Unit of Affordable housing  | N/A                  | N/A                   | N/A                     | At owners own cost  |



| Planning Ref | Location  | Proposal                           | Date signed by all parties | Clause description   | Financial sum agreed | Payment received date | Spend date | Notes  |
|--------------|---|------------------------------------|----------------------------|--|----------------------|-----------------------|------------|--|
|              | Crosswell   |                                    |                            |  |                      |                       |            |  |
| NP/06/537    | Harbour Boatyard, Saundersfoot                    | Residential development (12 Units) | 17.12.07                   | Two units of Affordable Housing  | N/A                  | N/A                   | N/A        | At owners own cost   |
| NP/07/344    | Sir Benfro Hotel, Herbrandston                    | Residential development (28 units) | 21.04.08                   | Affordable housing - 6 units   | N/A                  | N/A                   | N/A        | At owners own cost   |
|              |   |                                    |                            | Transportation   | £45,000.00           |                       |            | Payable in 3 instalments of £15000.00 on completion of the sale of the 1st property, 2nd property and final payment of sale of the 3rd property. |
| NP/07/402    | Development at Landway Farm, Cobbs Lane, Jameston | Residential development - 6 units  | 28.07.08                   | Affordable housing - 1 unit  | N/A                  | N/A                   | N/A        | At owners own cost   |
| NP/06/106    | Land at Parrog Road and The Pottery, Newport      | Residential development (6 Units)  | 26.01.09                   | 1 affordable housing unit for sale and 1 affordable housing unit for let | N/A                  | N/A                   | N/A        |  |
| NP/06/306    | Heywood Lodge Hotel, Heywood Lane, Tenby          | Residential Development (5 Units)  | 30.03.09                   | 1 x Affordable Housing unit  | N/A                  | N/A                   | N/A        | Determined by Appeal 23.04.07  |

| Planning Ref | Location  | Proposal   | Date signed by all parties | Clause description   | Financial sum agreed | Payment received date | Spend date | Notes  |
|--------------|---|--|----------------------------|--|----------------------|-----------------------|------------|--|
| NP/07/677    | Teggars Brewery, Brewery Terrace, Saundersfoot  | Redevelopment of site (Retail, Residential & Commercial)   | 05.05.09                   | Transportation works - improvements to main road frontage but not restricted to traffic calming, 20 mph zone, pedestrian crossings, wider pavements, improved signage along enhanced pedestrian access to car parking areas. | £10,000.00           | 17.06.11              |            | Contribution due within 28 days of commencement of development -Contribution includes interest for late payment. |
| NP/06/623    | The Jalna Hotel, Stammers Road, Saundersfoot    | Residential development (conversion to 9 units)  | 12.05.09                   | 2 x Affordable Housing units   | N/A                  | N/A                   | N/A        |  |
| NP/09/488/DG | Land at West Street, Newport                    | Residential Development (10 units)   | 23.07.10                   | Affordable Housing units x 4   | N/A                  | N/A                   | N/A        | When complete development will be known as 'Will Phillips Close.'  |
| NP/09/064    | Development at Battery Lane, South Beach, Tenby | Removal of Condition 12 of NP/08/120 to allow full residential use Fountains Café, Battery Road, Tenby | 28.07.10                   | Affordable Housing units x 5   | N/A                  | N/A                   | N/A        |  |

| Planning Ref | Location                                    | Proposal  | Date signed by all parties | Clause description   | Financial sum agreed | Payment received date | Spend date | Notes   |
|--------------|---|---|----------------------------|--|----------------------|-----------------------|------------|---|
| NP/10/5/11   | Blockett Farm, Little Haven                 | 6 dwellings   | 21.11.11                   | Transportation - provision of passing places in the locality                                       | £12,500.00           |                       |            | Payable upon 4 dwellings occupied.  |
|              |   |   |                            | Community  | £1,122.00            |                       |            |   |
|              |   |   |                            | Waste management   | £540.00              |                       |            |   |
|              |   |   |                            | Public open space  | £5,691.36            |                       |            |   |
|              |   |   |                            | Affordable housing   | 3 units              | N/A                   |            | Sell to RSL   |
| NP/11/247    | Bank Farm, Trefin                           | Residential development (3 dwellings) and new access from north-east.               | 13.02.12                   | Legal fee  | £500.00              | 20.02.12              | N/A        | Banked 20.02.12 - Audit number 008142   |
|              |   |   |                            | Transportation works contribution - provision of public transport cycle and walking infrastructure | £7,500.00            |                       |            | Total amount £10906.68 payable upon the date the 2nd dwelling is occupied.    |
|              |   |   |                            | Libraries/community  | £561.00              |                       |            |   |
|              |   |   |                            | Public open space  | £2,845.68            |                       |            |   |
|              |   |   |                            | Affordable housing   | 1 Unit               | N/A                   | N/A        | To be sold on the open market.  |
| NP/11/064    | Land at Clifton Rock, Greenhill Road, Tenby | Demolish existing building & erection of 9 dwellings                                | 29.07.11                   | Legal fee  | £1,500.00            | ?                     | N/A        | One S106 agreement for the three development/consents                         |
| NP/11/065    | Delphi Apartments, South Parade, Tenby      | Demolish existing building & construct 5 commercial units with 14 residential units |                            | Educational youth and lifelong learning facilities   | £15,320.00           |                       |            | Payable in two instalments of £22,360.00 upon date 30 & 40 dwellings occupied |

Pembrokeshire Coast National Park Local Development Plan

Annual Monitoring Report October 2011

| Planning Ref | Location   | Proposal   | Date signed by all parties | Clause description  | Financial sum agreed | Payment received date | Spend date | Notes   |
|--------------|--|--|----------------------------|---|----------------------|-----------------------|------------|---|
| NP/11/068    | Former Royal Gatehouse Hotel, White Lion Street, Tenby | Construct 39 apartments, 68 bed hotel, 3 commercial units & replacement cinema |                            | Public open space and recreational facilities to be provided by Tenby Town Council at Jubilee Gardens, Tenby. | £29,400.00           |                       |            |   |
|              |  |  |                            | Affordable housing  | 12 units             | N/A                   | N/A        | 12 flats - To be sold to RSL  |
|              |  |  |                            |   |                      |                       |            |   |
| NP/12/0194   | 44 Bryn Road, St Davids, Haverfordwest                 | Subdivision to create one additional dwelling                                  |                            | Affordable housing  | £14,056.00           |                       |            | If the money isn't spent within 3 years in the local area, the money should be made available to spend in the remainder Community Council and adjacent Community Council area if outside the National Park (excluding the main towns of the County). If not spent within 5 years return to applicant. <b>This has been agreed via condition and not S106.</b> |
|              |  |  |                            |   |                      |                       |            |   |

| Planning Ref | Location  | Proposal   | Date signed by all parties | Clause description | Financial sum agreed | Payment received date | Spend date | Notes   |
|--------------|---|--|----------------------------|--------------------|----------------------|-----------------------|------------|---|
| NP/12/0180   | Prospect House, 60 Nun Street, St Davids, Haverfordwest | Demolition of garage & construction of dwelling, replacement garage, with holiday/guest suite above and renovation of existing Bothy and attached lean to. |                            | Affordable housing | £6,710.00            |                       |            | If the money isn't spent within 3 years in the local area, the money should be made available to spend in the remainder Community Council and adjacent Community Council area if outside the National Park (excluding the main towns of the County). If not spent within 5 years return to applicant. <b>This has been agreed via condition and not S106.</b> |