

**Pembrokeshire Coast National Park  
Authority**

**Annual Monitoring Report**

for the Local Development Plan



**2014**


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## 1. Key Findings

- 1.1. This Annual Monitoring Report assesses the effects of the Local Development Plan against those which were anticipated. This report is for the financial year April 2013 to end of March 2014.
- 1.2. This report also reflects on previous Annual Monitoring Reports in anticipation of a full review of the Local Development Plan (a full review of the Local Development Plan is programmed for the end of the financial year 2014-2015).
- 1.3. The findings of the Annual Monitoring Reports of 2011, 2012, 2013 and 2014 have been considered by the National Park Authority. The Reports have also considered the Plan's achievement of its sustainability objectives.
- 1.4. Annual monitoring indicates that some alterations to the Local Development Plan are needed.
- 1.5. The tables below provide a visual aid of the effectiveness of policies during this Annual Monitoring Report period 2013-2014 using the 32 indicators analysed in the Monitoring Report. Commentary and action points both in the interim and for review stage are provided for those that are underperforming.

Target	Number of Indicators	
Targets / objectives are being achieved.	29	
Targets have not been achieved or poor performance, but no concerns over implementation of policy / objectives - see below for a summary of the issues.	1	

Target	Number of Indicators	
Monitoring indicates area of concern over implementation of policy / objectives.	2	


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

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

- 1.6. The Authority is required to demonstrate a five year effectively available housing land supply. The 2013 study concluded that the National Park had a 2.96 year land supply. The report uses the residual method to calculate the land supply. The 2012 concluded that the National Park had a 3.5 year land supply. The housing land supply for 2011 was 3.8 years. This shows a continuing decline in effectively available housing land supply.
- 1.7. **Conclusion:** The current position on housing land availability should improve as a result of the new supplementary planning guidance on affordable housing (see commentary under Indicator 22) and a

review of housing land supply in certain locations in the National Park. This is likely to include Dale, Dinas Cross, Herbrandston, Solva, Tenby and Trefin at formal Local Development Plan review stage.


### Affordable Housing Provision – Welsh Government Indicator No.22

		Performance
Monitoring indicates area of concern over implementation of policy / objectives.	1	

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

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

### Renewable Heat Target Indicator 12b

Policy Area	Indicator 12b	Target	Performance
Renewable Energy Policy 33		(Target - Planning permissions to contribute to an overall Renewable Heat Target for the National Park of 26 GWh <sup>1</sup> .)	

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

1.11. Below are additional issues arising from this fourth and previous monitoring reports along with a list of proposed actions and or proposals for alteration in response:

- a. **Settlement Facilities:** In anticipation of Local Development Plan review the facilities available in settlements around the National Park have been checked. The results of the survey work suggest that there will be a need to add Nevern and Rosebush as rural centres in the settlement hierarchy at review stage. (Chapter 2, of this Monitoring Report refers)
- b. **Policy 7a) and Policy 7d) Local Need:** The introduction of reference to allowing local needs proposals in places that may not be accessible other than by private car in

<sup>1</sup> This target taken from Appendix 4 of the Local Development Plan has been amended in this Annual Monitoring Report from 'between 35.2 and 40.7 GWh' to 26 GWh to reflect that many types of proposals that could previously be monitored through the planning system now have permitted development rights. Annual Monitoring Report 2013 explains in further detail. The Local Development Plan Appendix 4 will require amendment to reflect this change at formal review stage.

Technical Advice Note 6 (July 2010) means that an update is needed for Policy 7a) and d) of the Plan. The policy does not allow either infill or rounding off or conversion of buildings in inaccessible locations where it is for 'local need'. The local need definition in the adopted Plan at present is for affordable housing. A footnote referring to Technical Advice Note 6, paragraph 2.2.3 is required at formal Plan review stage. Technical Advice Note 6 is being relied upon in the interim. (Chapter 2, of this Monitoring Report refers)

- c. **Policy 7b) Rural enterprise dwellings:** being permitted (previously only referred to as agricultural and forestry dwellings): Policy 7 of the Local Development Plan will require a technical update at formal review stage to take account of this widening of opportunities). Current applications are being considered under this more recent national policy and guidance. (Annual Monitoring Report 2011 refers)
- d. **Policy 29 Sustainable Design:** That element of the policy which required energy efficiency improvements being sought in the original building as well as a proposed extension has not proved workable and is no longer being implemented by the Authority. It requires deletion from the Plan at review stage. (Annual Monitoring Report 2012 refers).
- e. The reasoned justification to the policy will also require updating at review stage to refer to the new national planning policy context (Chapter 2C of this Monitoring Report refers)
- f. **Sustainable Design Indicator 10:** The Indicator which refers to incorporating renewable energy technology with a scheme is proposed for deletion at review stage. It is not being monitored by the Authority. (Annual Monitoring Report 2011 refers). A revised indicator for LDP Policy 29 Sustainable Design will be produced at formal review stage, to enable a meaningful monitoring of the policy in contributing towards sustainable design in all development, replacing current Indicators 10 and 11.
- g. **Sustainable Design Indicator 11:** This indicator remains relevant for this monitoring period, however the changes to national planning policy has resulted in this indicator no longer being relevant beyond this monitoring report. This indicator will require deletion at review stage from the Plan's Appendix 4. (Chapter 2C of this Monitoring Report refers). A revised indicator for LDP Policy 29 Sustainable Design will be produced at formal review stage, to enable a meaningful monitoring of the policy in contributing towards sustainable design in all development, replacing current Indicators 10 and 11.
- h. **Renewable Energy Target:** The target for renewable heat under Indicator 12b has been updated to reflect the estimated target contribution from those proposals that require planning permission in the Annual Monitoring Report 2013. The Local Development Plan, Appendix 4 will require an update too.
- i. **Minerals Mapping:** The Welsh Government has published a map for South West Wales, which details the location and extent of mineral resources for the whole region and highlights those that should be safeguarded, it includes the recommended separation distances advised within Minerals Technical Advice Note 1 Aggregates. In terms of its implications, the Authority's minerals safeguarding zones has been checked and updated accordingly in the constraints mapping for development management purposes and will be reflected in the Local Development Plan at review (Annual Monitoring Report 2013 refers). The 'Safeguarding Minerals Zones' Supplementary Planning Guidance has also been updated accordingly.
- j. **Waste:** Waste: Welsh Government has recast national planning policy. The principles and policies contained in Planning Policy Wales and Technical Advice Note 21: Waste (2001) have now been revised to set out the strategic and spatial role of land use planning in facilitating these new waste management priorities, objectives and targets. This new policy and guidance will need consideration at Plan review stage and taken account of in the interim. (Chapter 2B of this Monitoring Report refers)
- k. **Employment:** Taking account of recent national planning policy changes a review of the Local Development Plan evidence base will need to be undertaken for the first Plan review. The existing evidence base was prepared in full consultation with a variety of stakeholders but in particular Pembrokeshire County Council who provide the economic development role for the whole of Pembrokeshire, including the National Park. In light of the direction for strategic collaboration between authorities this will need to be considered

through discussion with other authorities in the region. (Chapter 2d of this Monitoring report refers)

- l. **Policies 42 and 43** set out criteria against which speculative proposals for employment uses are considered, acknowledging, guidance provided by national planning policy. The revised Chapter 7 of Planning Policy Wales Edition 7 allows employment sites to be considered within or adjacent to identified rural settlements and this is a matter that will require updating through the review of the Local Development Plan, which currently directs proposals to appropriate locations within Centres or through building conversion in the countryside. In the interim, the updated national planning policy approach will be a material consideration in planning applications coming forward. (Chapter 2d of this Monitoring Report refers)
- m. **Visitor Economy:** The Authority is experiencing an increased number of enquiries and applications to increase the number of caravanning and chalet pitches, through the change of existing touring/camping pitches and new sites. This is likely to be a reflection of current demand for this type of accommodation and each case is being considered on its individual merits. Further research looking at occupancy rates of pitches at existing sites and demand will help to inform whether the policy approach should be reconsidered through the Local Development Plan review. Chapter 2D of this Monitoring Report refers.

## Sustainability Appraisal

- 1.12. An analysis of how the Plan is contributing to the sustainability appraisal objectives can be found in Chapter 3.
- 1.13. An analysis of how the Local Development Plan is contributing to the Sustainability Appraisal Objectives has identified no substantial issues for this monitoring period. Within the scope of the Local Development Plan, and its associated supplementary planning guidance documents, it is generally contributing positively to the Sustainability Appraisal Objectives. However, some issues have been identified that may become more significant in the future if they are not monitored and addressed in the near future.
- 1.14. **Affordable housing:** It is noted that the Local Development Plan is not achieving its target for affordable housing, which in the long term may adversely affect the sustainability of the some of the communities in the National Park. There are several reasons for this shortfall including the economic downturn, the lack of interest from some landowners in bringing sites forward and a perception that that the Authority was unwilling to negotiate. With high percentage requirements for affordable provision in the adopted Local Development Plan this required addressing in a poorer economic climate. Action has been taken to to address this issue in the short term by way of a new Supplementary Planning Guidance Document on Affordable Housing. Policy 45 on Affordable Housing will be one of the main focuses of the LDP review in 2015.
- 1.15. **Sustainable Design:** With regard to Policy 29 the policy as adopted sought to achieve energy, water and drainage efficiency improvements in the original building as well as in the extension where appropriate. This element of the Policy is not longer implementable and diminishes the anticipated achievements in terms of sustainability objectives of the Plan (2012 Monitoring Report refers). This is something that cannot be addressed through Plan review. In addition sustainable design will also be predominantly addressed through building regulations following this monitoring period. Also an indicator which refers to incorporating renewable energy technology with a scheme is proposed for deletion at review stage. It is not being monitored by the Authority. (Annual Monitoring Report 2011 refers). A revised indicator for Local Development Plan Policy 29 Sustainable Design will be produced at formal review stage, to enable a meaningful monitoring of the policy in contributing towards sustainable design in all development, replacing current Indicators 10 and 11.
- 1.16. **Environmental data:** There is a notable gap in the availability of up to date environmental data, particularly regarding biodiversity making it difficult to assess the impact of the Local Development Plan on it. To address this the National Park Authority is seeking alternative sources of information to assist. In addition the way in which water quality is assessed has changed leading to a lack of trend data, this will need to be monitored closely in the future to pick up any potential impacts arising from the implementation of the Local Development Plan.

## **Consultation and Further Information**

1.17. 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 2014 document are invited and will inform the production of the next report in 2015. Any comments and queries relating to this Monitoring Report should be addressed to:

Park Direction Service

Pembrokeshire Coast National Park Authority

Llanion Park

Pembroke Dock

Pembrokeshire

SA72 6DY

Tel 0845 345 7275

email [devplans@pembrokeshirecoast.org.uk](mailto:devplans@pembrokeshirecoast.org.uk)

## **Consultation on the 2013 Monitoring Report**




1.18. The 2013 Monitoring Report was made available for comment to relevant statutory bodies, stakeholders and individuals and was published on the Authority's web site. No adverse comment was received.

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

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

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

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

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

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

Source of Indicator	
Local Development Plan	
Local Development Plan Manual	
Welsh Government Core Indicator	<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 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.
- 2.5** Public transport is limited in the area in which all of these villages are located and the County Council was 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 have been some reductions in services since the adoption of the Local Development Plan due to the reduction in the Local Transport Services Grant to Pembrokeshire County Council from the Welsh Government. The reductions are mostly related to the removal of Sunday bus services. The overall reduction in service does not impact on the accessibility policy as even the most onerous requirements relate to services operating 6 days a week. There has been some reduction in frequency in a very small number of locations, the only one affecting the National Park area is the service operating between Haverfordwest and St Davids which is reduced from 1 hour frequency to 2 hour. Even so this will continue to meet the same category of service provision in terms of accessibility requirements for proposed developments along the route.
- 2.6** When considering planning applications, especially those in more remote locations, the Authority tests for accessibility to the nearest Centre. To test accessibility supplementary planning guidance was adopted in June 2013.<sup>2</sup>
- 2.7 Settlement Facilities:** In anticipation of Local Development Plan review the facilities available in settlements around the National Park have been checked. The results of the survey work suggest that there will be a need to add Nevern and Rosebush as rural centres in the settlement hierarchy.
- 2.8 Policy 7 Countryside:** The introduction of reference to allowing local needs proposals in places that may not be accessible other than by private car in Technical Advice Note 6 (July 2010) means that an update is needed for Policy 7a) and d) of the Plan. The policy does not allow either infill or rounding off or conversion of buildings in inaccessible locations where it is for 'local need'. The local need definition in the adopted Plan at present is for affordable housing. A footnote referring to Technical Advice Note 6, paragraph 2.2.3 is required. Technical Advice Note 6 is being relied upon in the interim.


## Policy Performance

Policy Area	Indicator 1	Target	Performance
All	Approvals contrary to recommendation.	0 approvals contrary to recommendation	

<sup>2</sup> Progress on Supplementary Planning Guidance is listed in Appendix 1.

<p><b>Trigger:</b> 3% of planning applications<sup>3</sup> decided contrary to recommendation in any one year.</p> <p><b>Reason:</b> To identify patterns over the Annual Monitoring Report period.</p>
<p><b>Analysis:</b> During the period April 2013 to March 2014 423 planning applications were received by the National Park Authority. 0.5% of applications (2) were approved contrary to recommendation.</p> <p><b>Conclusion:</b> The National Park Authority's application of policy positively supports the strategy of the Plan and achieving its key outcomes.</p>


Policy Area	Indicator 2	Target	Performance
National Park 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> 0 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 2013 and 31 March 2014 have engaged or breached the Sandford principle.</p> <p><b>Conclusion:</b> The National Park Authority's application of policy positively supports the strategy of the Plan and achieving its key outcomes.</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> 1 application was approved contrary to Policy 35. The proposal provided for self catering accommodation outside a Centre. The reasons given were that the material conditions put forward by the applicant were of sufficient weight to outweigh any harm. In particular the proposal would secure and increase employment in a rural area, improve the tourism product in the Dale Peninsula</p>			

<sup>3</sup> Full, outline or reserved matters applications.


and would also result in the removal of decaying buildings.

**Conclusion:** The National Park Authority's application of policy positively supports the strategy of the Plan and achieving its key outcomes.

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> No approvals contrary to this policy were recorded.</p> <p><b>Conclusion:</b> The National Park Authority's application of policy positively supports the strategy of the Plan and achieving its key outcomes.</p>			

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

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

Policy Area	Indicator 4	Target	Performance
	Effectiveness of Policies (Policy 2 to 7) & Supplementary Planning Guidance (Accessibility Assessment) when dealing with Applications at Appeals.	Inspector does not raise issues regarding the effectiveness of the policies or supporting supplementary planning guidance.	

**Analysis:**

In the period April 2013 to March 2014 a total of nine appeal decisions cited Local Development Plan policies and Supplementary Planning Guidance within this group, one quoted Policy 2 'Tenby Local Service and Tourism Centre' and eight quoted Policy 7 'Countryside'. Two decisions also quoted the 'Accessibility Assessment' Supplementary Planning Guidance, both of which were dismissed. Of the nine, four appeals were allowed. These comprised a variation/removal of condition for the Royal Playhouse Cinema development, which swaps the requirement to provide a cinema for A1-A3 units, two were for rural enterprise dwellings and one for a single dwelling as infill in Port Lion.

In one appeal case, the Inspector found no Local Development Plan or national policy justification for an extension as part of a barn conversion and subsequently dismissed the appeal. Whilst the Local Development Plan does not specifically state that extensions are acceptable, it conversely does not specifically exclude them. The Local Development Plan, in accordance with not replicating national policy (para 5.3.1 Local Development Plan Manual 2006), relied on Planning Policy Wales Edition 3 to provide the policy context for this. Planning Policy Wales Edition 3 paras 7.6.8 and 7.6.10 stated that conversions can be acceptable if they do not require major or complete re-construction and without extensive alteration, re-building or extension. Since the adoption of the Local Development Plan, however, the references in PPW Edition 3 have been omitted in more recent editions with Planning Policy Wales remaining relatively silent on the issue of extensions to barn conversions. In response to concerns raised by officers following the decision, the Planning Inspectorate agreed that in cases where the LDP is silent on an issue any relevant national policy would apply, stating that Section 3 of TAN 6 (2010) would be the most relevant national policy at the time. The provisions of Planning Policy Wales Edition 3 were later included in Technical Advice Note 23 Economic Development (2014), now providing a clearer policy justification for extensions as part of conversions.

**Conclusion:** The issue over the conversion and extension policy is considered to be resolved following the publication of Technical Advice Note 23. No other appeal decisions dispute the appropriateness of the policies for consideration in these decisions. There does not seem to be a pattern emerging in which these policies are contested by Inspectors. The allowed appeals were as result of differing judgements by the Inspectors on the evidence submitted by applicants or on design and landscape impact considerations, rather than disagreeing with the Local Development Plan policies.

## A. Special Qualities

### Key outcome


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


### Context

2.9 **Protected species:** The Authority needs to update 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). This requires programming when resources are available.

2.10 **Seascape Character:** Seascape character guidance was adopted by the Authority in December 2013.<sup>4</sup>

### Policy Performance

Policy Area	Indicator 5	Target	Information source
Policy 8 (Strategy Policy)	Approvals contrary to Strategy Policy 8 Special Qualities. Approvals contrary to Recommendation.	0 approvals	
<p><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 2013 to 31<sup>st</sup> March 2014, there were two proposals approved contrary to recommendation which referred to Policy 8. This has decreased from 3 in the previous annual monitoring report period.</p> <ul style="list-style-type: none"> <li>The first of the approvals was for a 2-storey rear extension in the countryside to the south of Newport. Officers considered the size and massing of the extension would be visually intrusive, detrimental to the host dwelling and the special qualities of the National Park. Members however disagreed with Officers' views and approved the application.</li> <li>The second approval was for a development of 18 holiday lodges at a former garden centre near St Ishmaels. Whilst the proposal was contrary to the policies of the Local Development Plan which seek to restrict additional camping, caravan and chalet pitches within the National Park, a number of Members reiterated views that they had expressed at the previous meeting, and approval of the application was moved and seconded. The reasons given were that the material conditions put forward by the applicant were of sufficient weight to outweigh any harm. In particular the proposal would secure and increase employment in a rural area, improve the tourism product in the Dale Peninsula and would also result in the removal of decaying buildings. The site has been subsequently placed on the market.</li> </ul> <p><b>Conclusion:</b> There were 2 approvals contrary to Policy 8, both of which were approved contrary to Officer recommendation.</p>			

Policy Area	Indicator 6	Target	Performance
	Effectiveness of Policies (Policy 1 and Policies 8 to 18) & Supplementary Planning Guidance (Landscape Character, Conservation Area Proposals, Regionally Important Geodiversity Sites and Historic Environment) when dealing with Applications at Appeals.	Inspector does not raise issues regarding the effectiveness of the policies or supporting supplementary planning guidance.	
<p><b>Analysis:</b> In the period April 2013 to March 2014, four appeal decisions cited Local Development Plan Policy 1 ‘National Park Purposes and Duty’, eleven cited Policy 8 ‘Special Qualities’, eight cited Policy 15 ‘Conservation of the Pembrokeshire Coast National Park’ and one cited Policy 16 ‘Open Space and Green Wedges’. One cited the Solva Conservation Area Supplementary Planning Guidance and one cited the Landscape Character Assessment Supplementary Planning Guidance. A total of twelve appeal decisions cited policies and Supplementary Planning Guidance within this section. Five of these appeals were allowed and one appeal gave a split decision.</p> <p>Of the five appeals allowed four related to design and landscape impact considerations (amongst other policy considerations outside of this group), where the Inspector’s judgement differed to the Authority’s.</p> <p>One appeal decision agreed with the Authority’s view that a renewal of permission for a static caravan in open countryside was contrary to the policies that seek to protect the National Park landscape, but found that personal circumstances outweighed this and thus allowed a renewal of temporary permission.</p> <p>The split decision related to a proposed porch and extension, where certain elements were considered acceptable and others not acceptable on design and amenity grounds. In this decision the Inspector removed reference to Policy 15 in the reason for refusal of part of the scheme, as it was considered the local nature of the impact did not merit the inclusion of this policy.</p> <p><b>Conclusion:</b> No appeal decisions dispute the appropriateness of the policies for consideration in these decisions. There does not seem to be a pattern emerging in which these policies are contested by Inspectors. The allowed appeals were as result of differing judgements by the Inspectors on the evidence submitted by applicants or on design and landscape impact considerations, rather than disagreeing with the Local Development Plan policies.</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>5</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

- 2.11 **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 has been conducted by the British Geological Survey, published in October 2012 and is entitled 'Aggregates Safeguarding Maps of Wales'. It includes a map for South West Wales, which details the location and extent of mineral resources for the whole region and highlights those that should be safeguarded, it includes the recommended separation distances advised within Minerals Technical Advice Note 1 Aggregates.<sup>6</sup> In terms of its implications, the Authority's minerals safeguarding zones have been updated accordingly on the planning application constraints layer, this will need to be reflected in the Local Development Plan at review.
- 2.12 The Regional Technical Statements (RTS) for both South and North Wales Regional Aggregate Working Parties (RAWP), which were first issued in 2008 have now undergone their first review (endorsed by Welsh Government in July 2014). The Regional Technical Statement provides a strategy for the future supply of construction aggregates within the Region concerned, taking account the latest available information regarding the balance of supply and demand, and current notions of sustainability, including the proximity principle and environmental capacity principle. Specific recommendations are made to individual Mineral Planning Authorities (MPAs) regarding the quantities of aggregate which need to be supplied from each area (apportionments) and the total tonnage of any new allocations. There is also an aspiration to reduce and eventually cease minerals production in National Park locations, in accordance with Minerals Planning Policy Wales and Minerals Technical Advice Note 1. As such, this Minerals Planning Authority is not required to keep a land bank of minerals permissions, although operations within the Pembrokeshire Coast National Park currently provide a significant proportion of the sand and gravel supply in the South Wales Regional Aggregates Working Party. The apportionments for Pembrokeshire Coast National Park, Pembrokeshire County Council, Carmarthenshire County Council and Ceredigion County Council have been combined within the draft Regional Technical Statement. This is to encourage collaborative working between these authorities to find alternative sites for sand and gravel provision, once existing National Park operations have ceased. If no environmentally acceptable alternatives can be found or the increased use of alternative aggregates such as marine sources is not sufficient, further allocations may be considered acceptable within the National Park in exceptional circumstances.<sup>7</sup>
- 2.13 **Waste:** Welsh Government Policy Clarification Letter CL-01-12 identified that a recast of national planning policy on waste was needed to reflect the new waste policy context introduced through the EU Directive on Waste (2008/98/EC; the Waste

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<sup>5</sup> See *Planning Policy Wales, Edition 5, November 2012, 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>6</sup> <http://www.bgs.ac.uk/mineralsuk/planning/resource.html>

<sup>7</sup> <http://www.swrawp-wales.org.uk/Html/rtsreview2013.html>

Strategy for Wales, 'Towards Zero Waste'; and the underpinning suite of waste sector plans, in particular the Collections, Infrastructure and Markets Sector Plan.

- 2.14 The principles and policies contained in Planning Policy Wales and Technical Advice Note` 21: Waste (2001) have now been revised to set out the strategic and spatial role of land use planning in facilitating these new waste management priorities, objectives and targets.
- 2.15 Most notably for the National Park Authority, the Regional Waste Plans (1<sup>st</sup> Review) have now been revoked as part of the new national policy. Appendix L7 of the South West Regional Waste Plan (1<sup>st</sup> Review) excluded National Park from providing facilities that served more than one local authority (i.e. planning authority). However, the Areas of Search Maps that support them remain extant in current national policy, these are to be used to inform strategic decisions on locating waste management facilities within the region. These maps exclude National Parks for areas of sub regional waste management facilities (facilities that serve more than one local authority).
- 2.16 Technical Advice Note 21, para 3.19 emphasises that many general employment sites and major industrial areas are likely to be suitable locations for waste facilities. This will depend upon factors such as existing users and the strategy adopted in the Local Development Plan for particular employment sites. Technical Advice Note 21 para 3.27 sets out some suggestions of locations which may be appropriate for new waste treatment facilities, although the suitability of these sites must be considered on a case by case basis, taking into account the merits of each particular proposal. Annex C provides detail on specific planning considerations and states that facilities should not have an adverse impact on areas designated for national protection such as National Parks (paras 8.2 and 15.1). It also states that this does not preclude suitable proposals for waste facilities located within boundaries of National Parks, provided they are appropriately designed (para 8.3).
- 2.17 To help developers and local planning authorities consider a proposal and how it will contribute to the provisions of 'Towards Zero Waste' and the Collections, Infrastructure and Markets Sector Plan, Technical Advice Note 21 introduces a waste planning assessment. This should be submitted with all applications for a waste facility classified as a disposal, recovery or recycling facility. Practice Guidance has also been produced, which provides technical information on the most common categories of waste treatment facilities. Technical Advice Note 21 also identifies that it is necessary to monitor planning permissions and environmental permits to be aware of present and future waste management capabilities.<sup>8</sup>
- 2.18 The implications of the above policy changes for the Local Development Plan will need to be considered at review.
- 2.19 Work has started on the construction of a new Civic Amenity and Recycling Centre on land at Devonshire Drive, Saundersfoot (planning reference 13/1110/PA, approved 24<sup>th</sup> June 2014). This site lies within Pembrokeshire County Council although is intended to replace the existing Salterns site within Tenby and serve both the County Council and National Park area. The new facility will provide greater capacity for the collection and segregation of municipal waste and will contribute towards the Council (as the waste collection authority) achieving European and national waste treatment targets.
- 2.20 **Marine planning:** The Marine Planning Branch of the Marine and Fisheries Division of Welsh Government is developing a Welsh National Marine Plan (WNMP). The UK's Marine Policy Statement (March 2011) provides the high level context for the Welsh National Marine Plan. The Marine Policy Statement states that marine planning systems will sit alongside and interact with existing planning regimes – including local development plans - across the UK. Engagement to determine the Welsh National Marine Plan's scope, vision and objectives is underway (August

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
<sup>8</sup> <http://wales.gov.uk/topics/planning/policy/tans/tan21/?lang=en>





2014). The programmed adoption date for the Welsh National Marine Plan is in 2015.

2.21 **Combined Heat and Power Proposal at South Hook:** The deadline for the Planning Inspectorate to submit recommendation to the Secretary of State was the 23/07/2014. There will then be a period of 3 months for the Examining Authority to consider and make a recommendation to the Secretary of State. The Secretary of State will have 3 months in which to make their decision. Sufficient evidence was provided during the examination to satisfy the National Park Authority that exceptional circumstances had been shown to meet the major development test.

## Policy Performance

Policy Area	Indicator 7	Target	Performance
Major development	Approvals of proposals that engage Major Development Test	0 approval of major development unless exceptional circumstances are proven.	
<p><b>Trigger:</b> Approval of 1 major development where no exceptional circumstances are shown in any one year.</p> <p><b>Reason:</b> To ensure a consistent approach with first purpose and Planning Policy Wales Major development test.</p> <p><b>Analysis:</b> Between April 1<sup>st</sup> 2013 and March 31<sup>st</sup> 2014 no application for a major development was approved. Please see context above for commentary regarding Combined Heat and Power at South Hook Liquefied Natural Gas.</p> <p><b>Conclusion:</b> There are no issues arising regarding the policy framework of the Plan.</p>			

Policy Area	Indicator 8	Target	Performance
Minerals	Applications for minerals development	0 approval for new minerals development unless exceptional circumstances are proven.	
<p><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 no approvals between April 13 to March 14 for a new or extended mineral site.</p> <p><b>Conclusion:</b> There are no issues arising.</p>			

Policy Area	Indicator 9	Target	Performance
	Effectiveness of Policies (Policies 19 to 28) & Supplementary	Inspector does not raise issues regarding the effectiveness of	

	Planning Guidance (Land Instability from coal workings Safeguarding Minerals,) when dealing with Applications at Appeals	the policies or supporting supplementary planning guidance.	
<p><b>Analysis:</b> In the period April 2013 to March 2014 no Inspectorate appeal decisions refer to these policies or relevant supplementary planning guidance in their decision making.</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>9</sup>
- (2) The National Park contributing to renewable energy generation.<sup>10</sup>
- (3) No vulnerable development<sup>11</sup> in areas which would be at risk of flooding both now and in the long term and with no negative impacts elsewhere.

### Context

2.22 **Sustainable Design:** In July 2014 the new Part L (relating to energy efficiency) of the Building Regulations was released by Welsh Government. At the same time, Edition 7 of Planning Policy Wales was released, which updates Chapter 4 'Planning For Sustainability'. Technical Advice Note 22 'Planning for Sustainable Buildings' was cancelled and Technical Advice Note 12 'Design' was updated to incorporate key aspects of Technical Advice Note 22. Practice Guidance 'Planning for Sustainable Buildings' was published to supplement the new national planning policy. The changes remove the requirement for new buildings to reach either the Code for Sustainable Homes or the BREEAM (Building Research Establishment Environmental Assessment Methodology) standard as part of national development management policy, which now refers to the new Building Regulations as the appropriate vehicle for setting building standards. The key aspects from Technical Advice Note 22, which have been merged into Technical Advice Note 12 (and therefore remain in force) include the energy hierarchy, allowable solutions and sustainable building policies on strategic sites in Local Development Plans. The Practice Guidance provides guidance to local planning authorities and developers on how sustainable design can be incorporated into development proposals<sup>12</sup>. The subtext to Local Development Plan Policy 29 'Sustainable Design' will require updating to refer to the new policy context.

2.23 Householder permitted development rights have been amended under Part 1, Schedule 2 of the Town and Country Planning (General Permitted Development) (Amendment) (Wales) Order 2013, which came into force in September 2013. Micro generation permitted development rights have also been extended in the past year to include non domestic properties, in addition to domestic, via Part 43 of The Town and Country Planning (General Permitted Development) (Amendment) (Wales) (No.2) Order 2012, which came into force in October 2012.

2.24 **Marine Energy:** There have been a series of publications that indicate that the Authority may experience more proposals for on shore infrastructure in

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<sup>9</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>10</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>11</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>12</sup> <http://wales.gov.uk/docs/desh/publications/140731chief-planning-officer-letter-ppw-en.pdf>


relation to marine energy developments in the future. Of particular interest will be the outcomes from Grid connection studies to investigate required grid upgrades and the selection of land fall sites and any development of onshore infrastructure projects to support developer-led marine renewable energy installations. The Local Development Plan includes policy advice for onshore connections in Policy 33.

2.25 Supplementary Planning Guidance on the Cumulative Impact of Wind Turbines was adopted by the Authority in December 2013.


## Policy Performance

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

Policy Area	Indicator 11	Target	Performance
Sustainable Design Policy 29	Compliance with code for sustainable homes <sup>13</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 2013 and March 2014 complied with the Planning Policy Wales (Edition 6) requirements (paragraph 4.12.4).</p> <p><b>Conclusion:</b> This indicator remains relevant for this monitoring period, however the changes to national planning policy described above in paragraph 2.16 result in this indicator no longer being relevant beyond this monitoring report. A revised indicator for LDP Policy 29 Sustainable Design will be produced at formal review stage, to enable a meaningful monitoring of the policy in contributing towards sustainable design in all development.</p>			

Policy Area	Indicator 12a	Target	Performance
Renewable Energy Policy 33	Capacity of renewable energy schemes permitted and completed.	Planning permissions to contribute to an overall Renewable Electricity Target for the National Park of	

<sup>13</sup> This includes better management of surface water run-off to cope with the impacts of climate change.

Policy Area		Indicator 12a	Target	Performance
			4.91GWh.	
Policy Area		Indicator 12b	Target	Performance
Renewable Energy Policy 33			(Target - Planning permissions to contribute to an overall Renewable Heat Target for the National Park of 26 GWh <sup>14</sup> .)	

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


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

**Analysis:** Electricity Generation Gwh (estimate) equals an estimated 3.54 Gwh if all the permissions granted since 2006 are implemented. The proposals are primarily for wind turbines and photovoltaics.

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


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 30 refusals of permission and 146 approvals for various types of renewable energy.

**Conclusion:** Even though permitted development rights mean that all proposals cannot be counted the Plan is ahead of potential target on electricity generation (if all those with permission are assumed to have been constructed) but significantly behind on heat generation. The sum of estimated contributions from solar thermal, biomass and heat pumps have formulated the above heat generation target.


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

<sup>14</sup> This target taken from Appendix 4 of the Local Development Plan has been amended in this Annual Monitoring Report from 'between 35.2 and 40.7 GWh' to 26 GWh to reflect that many types of proposals that could previously be monitored through the planning system now have permitted development rights. Annual Monitoring Report 2013 explains in further detail. The Local Development Plan Appendix 4 will require amendment to reflect this change at formal review stage.

Policy Area		Indicator 12c	Target	Performance
		Guidance	Turbines on Landscape and Visual Amenity 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 above). A more meaningful measure is how effective the Renewable Energy Supplementary Planning Guidance will be (adopted October 2011,) in providing a supportive context for renewables provision while protecting the special qualities of the National Park. Deciding applications contrary to this 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> 2013 and March 31<sup>st</sup> 2014) shows that there have been an estimated 8 refusals of permission and 5 approvals. This has included 1 approval for solar PV panels with 2 refusals (both refusals on the same site), 2 approvals and 6 refusals for wind turbines (one refusal subsequently approved on re-submission), 1 approval for an air source heat pump and 1 approval for housing of a domestic biomass boiler. All of these have been in line with policy and the Supplementary Planning Guidance (for applications made after adoption in October 2011). There was a significantly lower number of applications for renewable energy developments within this monitoring period in comparison with the previous year, a reduction from 29 to 14 respectively.</p> <p><b>Conclusion:</b> The policy context and supplementary planning guidance continues to provide a positive framework for renewable energy generation. The cumulative impact of wind turbines in certain areas of the National Park is becoming more of a common issue to address. The refusals of permission for the wind turbines and solar arrays related to overriding landscape concerns and in some cases a lack of information to fully consider all material planning considerations. 3 turbine refusals were appealed and have subsequently been dismissed by the Inspector, these decisions were issued after this monitoring period however.</p>				

Policy Area		Indicator 13	Target	Performance
Flooding 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 years) 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 Natural Resources Wales (formerly the Environment Agency). 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. 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 Planning Guidance (Sustainable Design Guidance, Renewable Energy) at Appeals and when dealing with Applications	Inspector does not raise issues regarding the effectiveness of the policies or supporting supplementary planning guidance.	
<p><b>Analysis:</b> In the period April 2013 to March 2014, eleven appeal decisions cited Local Development Plan policies and Supplementary Planning Guidance within this group. Of the eleven, four decisions cited Policy 29 'Sustainable Design', six decisions cited Policy 30 'Amenity' and three cited Policy 33 'Renewable Energy'. Two decisions cited the Sustainable Design Supplementary Planning Guidance and two cited the Renewable Energy Supplementary Planning Guidance. Five appeals were allowed where the Inspector (amongst other considerations in some cases) did not consider that the proposals in question would cause harm to the appearance and character of the area or cause an unacceptable impact upon amenity. The split decision, which is explained in Indicator 6 of this report, included references of policies 29 and 30 and the Sustainable Design Supplementary Planning Guidance in the Inspector's considerations for this decision.</p> <p><b>Conclusion:</b> No appeal decisions dispute the appropriateness of the policies for consideration in these decisions. There does not seem to be a pattern emerging in which these policies are contested by Inspectors. The allowed appeals were as result of differing judgements by the Inspectors on the evidence submitted by applicants or on design and landscape impact considerations, rather than disagreeing with the Local Development Plan policies.</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

2.26 **Changes to Chapter 7 of Planning Policy Wales and publication of TAN23 Economic Development (February 2014)** This sets out the importance of considering economic development and growth alongside social and environmental considerations within the context of sustainable development and to ensure that growth is not constrained by lack of land. Detail is also provided on the evidence base required to support Development Plans and highlights the need for collaboration between Authorities to ensure strategic planning and up-to-date evidence for economic development.

2.27 Whilst the objectives set out in the changes to Chapter 7 and the Technical Advice Note 23 can largely be accommodated through application of the existing policies within the Local Development Plan, there are two main areas which will require attention:

- a. A review of the Local Development Plan evidence base will need to be undertaken for the first Plan review. The existing evidence base was prepared in full consultation with a variety of stakeholders but in particular Pembrokeshire County Council who provide the economic development role for the whole of Pembrokeshire, including the National Park. In light of the direction for strategic collaboration between authorities this will need to be considered through discussion with other authorities in the region.
- b. The Local Development Plan includes several business and mixed use allocations, some of which are currently being developed at Tenby and Saundersfoot. Policies 42 and 43 also set out criteria against which speculative proposals for employment uses are considered, acknowledging, guidance provided by national planning policy. The revised Chapter 7 now allows employment sites to be considered within or adjacent to identified rural settlements and this is a matter that will require updating through the review of the Local Development Plan, which currently directs proposals to appropriate locations within Centres or through building conversion in the countryside. In the interim, the updated National Planning Policy approach will be a material consideration in planning applications coming forward.


### 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.	
<b>Trigger:</b> Loss of two or more employment sites or 500 sq metres contrary to recommendation			
<b>Reason:</b> Small employment sites can make an important contribution to sustainable communities.			
<b>Analysis:</b> No applications were approved contrary to this policy during the monitoring period (2013 to			




2014).

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

Policy Area		Indicator 18	Target	Performance
Visitor Accommodation Policy 35		Counts of hotel spaces, self catering, caravan and camping spaces (Hotels, self catering, caravan databases etc).	Maintain current levels of provision except where loss of hotel proven.	
<p><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> An application for 18 holiday lodges at a former garden centre near St Ishmaels was approved by Members contrary to Officer recommendation. Whilst the proposal was contrary to the policies of the Local Development Plan which seek to restrict additional camping, caravan and chalet pitches within the National Park, Members considered that on this occasion the quality of the accommodation, including accessibility for people with disabilities coupled with limited availability of holiday accommodation in the peak season in this area of the Park and the opportunity to support a viable business outweighed the policy position.</p> <p><b>Conclusion:</b> The Authority is experiencing a number of enquiries and applications to increase the number of caravanning and chalet pitches, through the change of existing touring/camping pitches and new sites. This is likely to be a reflection of current demand for this type of accommodation and each case is being considered on its individual merits. Any trends for approval of proposals contrary to recommendation will need to be carefully considered, but this is currently a single occurrence which alone does not jeopardise the integrity of the policy position. Further research looking at occupancy rates of pitches at existing sites and demand will help to inform whether the policy should be reconsidered through the Local Development Plan review.</p>				

Policy Area		Indicator 19	Target	Performance
Special Qualities 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</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 and the Recreation and Leisure Activities Supplementary Planning Guidance (2013-2014).</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></p> <p>In the period April 2013 to March 2014, one appeal decision cited Policies 37 'Self Catering Development' and Policy 38 'Camping, Touring Caravans, Statics and Chalet Sites'. This appeal related to the the renewal of temporary permission for a static caravan for holiday use in an open countryside location (also referred to in Indicator 6). Whilst the Inspector agreed that the siting of a caravan for holiday use at this location would be contrary to Policy 38, it was considered that the planning history and personal circumstances of the appellant outweighed this decision. Whilst relating to a static caravan, the Authority considered Policy 37 to be relevant, the delegated report provides the following explanation:</p> <p><i>'It is recognised, however, that the nature of a single static caravan on an individual plot is different in nature to a holiday park of many statics, and in this instance, whilst Policy 38 is relevant, the terms of Policy 37 in respect of where appropriate development should be directed remains applicable. In light of this, a planning application for a static caravan for holiday purposes and in a countryside location would not meet the requirements of the Plan.'</i></p> <p>The Inspector did not agree with the above and as such did not consider Policy 37 relevant in this case.</p> <p><b>Conclusion:</b> Whilst the Inspector did not agree with the inclusion of Policy 37 for this case, it was agreed that the siting of a static caravan at the site location would be contrary to Policy 38, other material considerations outweighing this consideration in this case. The above comprises an individual consideration based upon the merits of a particular proposal and as such, no firm conclusions can be drawn. Officers should take note of the Inspector's consideration of this case when dealing with similar proposals in the future.</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>15</sup>.

### Context


2.24 **Housing Market:** Recent reports would suggest that housing market may be becoming more buoyant. The nature of the housing market over the lifespan of the Local Development Plan is and will be the subject of much conjecture and conflicting forecasts. The link below provides detailed commentary on housing starts and completions in Wales recently.<sup>16</sup>

2.25 **Affordable Housing Report:** When the Local Development Plan was considered for Examination (2010) the assumptions made for testing viability were considered by the Inspector. The Authority has carried out new viability appraisals and in advance of the Local Development Plan's full review (formally programmed at the end of the financial year 2014 to 2015) has set out changes in approach in its supplementary planning guidance for affordable housing which is being operated from the 1<sup>st</sup> of July 2014. Appendix 2 sets out a summary of change in approach.

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

2.27 **Low Impact Development:** The Authority has adopted an updated Low Impact Making a Positive Contribution Supplementary Planning Guidance to take account of newly published Welsh Government policy and guidance.<sup>17</sup> There are no implications arising for Policy 47 Low Impact Development Making a Positive Contribution.

### 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.	

<sup>15</sup> See Glossary of Terms

<sup>16</sup> <http://wales.gov.uk/docs/statistics/2014/140619-new-house-building-january-march-2014-en.pdf>

<sup>17</sup> [Pembrokeshire Coast National Park - SPG](#)

**Trigger:** Less than a 5 year supply in any one year.

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

**Analysis:** The Authority is required to demonstrate a five year effectively available housing land supply. The 2013 study concluded that the National Park has a 2.96 year land supply. The report uses the residual method to calculate the land supply. The 2012 concluded that the National Park has a 3.5 year land supply. The housing land supply for 2012-2011 was 3.8 years. This shows a continuing decline in in effectively available housing land supply.

Appendix 1 advises on the current position regarding individual sites, i.e, whether they have permission or are completed; whether they are being actively promoted by landowners or whether there appears to be significant issues with bringing the sites forward.

For Local Development Plan review the following locations are likely to need a fresh look to identify what sites would better help with the primary objective of bringing forward affordable housing as soon as possible: Dale, Dinas Cross, Herbrandston, Solva, Tenby and Trefin. This should assist with improving the picture on housing land availability.


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

- a) Approving planning applications for housing developments provided all relevant policy considerations are met. The majority of applications submitted to the Authority in the past few years have been on small sites which are not listed in the land supply. Site visits undertaken in November 2013 and beginning of April 2014 show an increase in the level of activity on these small sites and on some of the larger sites which will be recorded in the 2014 Land Availability study.
- b) Further to the consideration of affordable housing delivery in the National Park by the Authority's Scrutiny Committee in 2012/13, Nathaniel Litchfield and Andrew Golland Associates were commissioned to advise on ways in which it might be improved. The study was the result of concern raised through the Authority's own Scrutiny Committee that recent delivery rates have fallen below what is required and set out in the Local Development Plan. The study:
  - Undertook a range of consultation including a workshop with landowners and agents;
  - Re-ran the viability assessment for the allocations in the Plan;
  - Looked at how to streamline the planning application process;
  - Reviewed how affordable housing information is disseminated in the National Park;
  - Reviewed approaches to affordable housing delivery elsewhere; and
  - Re-drafted the Authority's Supplementary Planning Guidance on Affordable Housing, in line with the Study's conclusions. Please see Indicator 22 for more information on the outcomes.
- c) The Authority has a continuing dialogue with owners of many of the land allocations in the Park. Several of the landowners are undertaking preparatory work to start bringing sites forward for development and will be reflected in the 2014 Land Availability Study.
- d) The Authority is considering once again the potential for release of the limited land in its ownership.

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

**Conclusion:** The current position on housing land availability should improve as a result of the new supplementary planning guidance on affordable housing (see commentary under Indicator 22) and a review of housing land supply in certain locations in the National Park . This is likely to include Dale,

Dinas Cross, Herbrandston, Solva, Tenby and Trefin at formal Local Development Plan review stage.

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.  1000 general market dwellings built. In total an annual completion rate of 90 per annum.	Actions are proposed to improve delivery  

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

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

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

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. Between 2007 and 2014 a total of 60 affordable dwellings have either been completed or are under construction.

The table below provides further breakdown.

	Target Annual Completions	Completions Recorded	Target Annual Affordable Completions or u/c	Affordable Completions or u/c recorded
2007-2008	90	105	28	7
2008-2009	90	86	28	15
2009-2010	90	37	28	12
2010-2011	90	27	28	3
2011-2012	90	36	28	0
2012-2013	90	38	28	0
2013-2014	90	44	28	23
Total	630	373	196	60


On affordable housing contributions as at June 2014 £185,759.00 is due for payment and £146,354.00 has been paid. On some permissions the detail of payments has not been agreed. This is the case for 8 permissions. The contributions due for these permissions will be calculated at reserve matters stage and are not included in the figures above.

This element of affordable housing provision is intended as a minor part of the affordable housing provision for the Plan period.

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

Policy Area		Indicator 22	Target	Performance
<p>The Authority has taken interim steps in advance of a full review of the Local Development Plan to address the issue. These are set out in Appendix 2. In summary there are changes to the level of affordable housing expected. The amount is reduced. The amount expected from affordable housing contributions is generally also reduced. It is anticipated that this change in approach will be taken forward into Local Development Plan review.</p> <p>This will result primarily in changes to the percentage requirements for affordable housing shifting downwards in Policy 45 as set out in Appendix 2 for the various submarket areas and in the allocations listed in Tables 3 and 7 of the Local Development Plan.</p> <p>Please also see under Indicator 21 above for additional areas for review.</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 at formal review.
	W	And as a percentage of total development permitted.	No target specified in the Plan.	
<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: Assess at formal review stage. Conclusion:</b> Assess at formal review stage 2014.</p>				

Policy Area		Indicator 24	Target	Performance
Policy 44	W	Average density of housing development permitted on allocated development plan sites. <sup>18</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><b>Reason:</b> To make the best use of available land.</p> <p><b>Analysis:</b> No permissions were granted on allocated sites during the monitoring period 2013 to</p>				

<sup>18</sup> Policy 44 second last paragraph requires a density of 30 dwellings per hectare on housing developments in Centres not just on housing allocations.

2014.

**Conclusion:** No pattern is emerging to cause concern.

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

**Analysis:** In the period April 2013 to March 2014 three decisions cited Local Development Plan policies or Supplementary Planning Guidance in this group. One decision cited Policy 45 'Affordable Housing' and another cited the 'Affordable Housing' Supplementary Planning Guidance, one was dismissed and one was allowed. However in both decisions, the main issue related to design and landscape impact grounds, there was no contention over affordable housing provision. One decision cited Policy 47 'Low Impact Development' and the 'Low Impact Development' Supplementary Planning Guidance. This appeal was against an enforcement notice served on unauthorised residential use and works in an agricultural field. The Inspector agreed with the Authority's view that the appellant had failed to provide key assessments required by policy and guidance and subsequently dismissed the appeal, although did extend the period of time for the appellant to comply with the enforcement notice.

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

## 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 provide a transitional period after which planning obligations designed to collect pooled contributions from 5 or more developments may not be used to provide infrastructure which could be funded from Community Infrastructure Levy, or on the local adoption of the levy if this is before the end of the transitional period. Analysis shows that this threshold has not been reached to date. In the longer term the preparation of a Community Infrastructure Levy will be heavily dependent on the County Council as the primary service provider. Raising awareness and liaising with the Council will be essential. The latest amendments to the Community Infrastructure Levy regulations came into force on the 24th February 2014. These include limiting the pooling of S106 until April 2015.<sup>19</sup>

2.28 **Retailing:** The recent National Retail Barometer study for Quarter 1 of 2014 indicates that retail centres are showing signs of growth and falling vacancy rates since 2012/2013 data.. The current UK average vacant floorspace in town and city centres is 11.9%, the vacant units are at 15.1%.<sup>20</sup> The Department for Local Government and Communities released a consultation document, which sought to change the permitted development rights for the change of use of properties outside of prime retail locations. The proposals reflected the advice of the [Portas Review](#), which recommended more flexibility for change of use, and would help the high street, rural communities and local retailers by increasing footfall and spending.<sup>21</sup> New permitted development rights for shops in England have subsequently been published in April 2014 under The Town and Country Planning (General Permitted Development) (Amendment and Consequential Provisions) (England) Order 2014. These rights provide a prior approval process for the conversion of retail units to residential use in town centres<sup>22</sup>. In Wales The Town and Country Planning (General Permitted Development) (Amendment) (Wales) Order 2014 introduced new rights for shops, although these did not include a change of use to residential<sup>23</sup>. A future Local Development Plan Annual Monitoring Report will need to consider the significance of any further amendments to Welsh permitted development rights or national planning policy.

2.29 The Authority has adopted guidance on Accessibility in December 2013.<sup>24</sup>

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<sup>19</sup> <http://www.legislation.gov.uk/ukdsi/2014/9780111108543/contents>

<sup>20</sup> <http://www.colliers.com/sitecore/shell/-/media/Files/EMEA/UK/research/retail/201401-national-retail-barometer.pdf>

<sup>21</sup> <https://www.gov.uk/government/consultations/greater-flexibilities-for-change-of-use>


<sup>22</sup> <http://www.planningresource.co.uk/article/1285256/shop-conversion-regulations-published>


<sup>23</sup> <http://www.planningresource.co.uk/article/1287641/town-country-planning-general-permitted-development-amendment-wales-order-2014>


<sup>24</sup> [Link to Accessibility Guidance](#)




## Policy Performance

Policy Area		Indicator 26	Target	Performance
Community Facilities Policy 48		Number of approvals for loss of community facilities	0 unless justified by policy framework	
<p><b>Trigger:</b> 1 or more community facilities lost contrary to recommendation.</p> <p><b>Reason:</b> Communities facilities are important to community sustainability.</p> <p><b>Analysis:</b> No applications determined between 1<sup>st</sup> April 2013 and 31<sup>th</sup> March 2014 linked to Policy 48 resulted in a community facility being lost contrary to recommendation.</p> <p>Commentary is provided on sites allocated for community facilities in Appendix 2.</p> <p><b>Conclusion:</b> No need to review.</p>				

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


Policy Area		Indicator 28	Target	Performance
	W	Amount of greenfield and open space lost to development (ha) which is not allocated in the plan.	<p>Greenfield - 0 % except for exceptional land released for affordable housing or community facility provision.</p> <p>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</p>	


		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 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.</p> <p><b>Analysis:</b> Twenty-three applications were approved which included the development of greenfield land during the monitoring period This amounted to the development of 1.71ha of greenfield land.</p> <p>Of the 23 applications:</p> <ul style="list-style-type: none"> <li>• 7 were for agricultural buildings or access improvements on existing farms;</li> <li>• 2 were for wind turbines;</li> <li>• 1 was for polytunnels;</li> <li>• 1 was for a solar farm;</li> <li>• 4 were for housing sites (total 10 dwellings);</li> <li>• 1 was for a roundhouse linked to an existing health business;</li> <li>• 1 was to extend residential curtilage;</li> <li>• 1 was for a replacement lifeboat station;</li> <li>• 1 was for a grid connection cabinet linked to a hydro-electric scheme;</li> <li>• 1 was for a mast on MoD land;</li> <li>• 1 was for a shed to housing technical equipment for extraction of water from a borehole;</li> <li>• 1 was for a new building for indoor teaching facilities at an existing golf club; and</li> <li>• 1 was for improved access to a horse stables/stud business.</li> </ul> <p><b>Conclusion:</b> All of the above developments were approved in accordance with Local Development Plan policies. Of the 4 housing sites granted permission, two were on land with long-planning history for residential development within small settlements. One of the remaining sites was an infill plot within a small settlement which met with the definition in the Plan and the other a rounding off of development in another small settlement. The latter two sites for a total of 4 dwellings include 2 affordable dwellings. These applications were approved in accordance with the Local Development Plan policies and the target has therefore been met during this monitoring period.</p>			

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 of local communities. This is also a Welsh Government indicator.</p>				


**Analysis:** There were no applications relating to the loss of openspace permitted within the monitoring period.

**Conclusion:** The National Park Authority's application of policy positively supports the strategy of the Plan and achieving its key outcomes.


Policy Area		Indicator 30	Target	Performance
Retail 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 4% at 2014. This is below the UK average of 11.9%<sup>25</sup>. A break down of vacant floorspace percentage by centre is as follows, Newport 0.8%, Saundersfoot 2.3%, St Davids 3.1%, Solva 7.9% and Tenby 5.2%.</p> <p><b>Conclusion:</b> No issues arise regarding vacancy rates in the National Park's retail centres. The centres appear to follow the national trend of a slight recovery, all with a higher number of A class units than in Summer 2013, only Tenby shows a small increase in vacant floorspace by 0.4%.</p>				

Policy Area		Indicator 31	Target	Performance
Transport Policy 52		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 52 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 (2013-2014).</p> <p><b>Conclusion:</b> There are no issues arising.</p>				

<sup>25</sup> <http://www.colliers.com/sitecore/shell/-/media/Files/EMEA/UK/research/retail/201401-national-retail-barometer.pdf>

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 (2013-2014)</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 formal 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 formal review.</p> <p><b>Conclusion:</b> Assess in 2014 formal review. This may include a need to review the current indicator due to changes in national planning policy.</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 2013 to March 2014, two appeal decisions cited Local Development Plan policies within this group. One appeal decision cited Policy 48 'Community Facilities and Infrastructure Requirements'. This appeal was allowed for a variation/removal of condition for the Royal Playhouse Cinema development, to swap the requirement to provide a cinema as part of the development for A1-A3 units. This application was originally recommended for approval, but was refused by the Development Management Committee on the grounds of insufficient information to prove that the provision of the cinema or other community facility would be unviable. The Inspector considered that sufficient evidence had been submitted and thus justify the loss of a community facility provision.</p>				

Another decision cited Policy 52 'Sustainable Transport', this was for a single dwelling where the main issue for the appeal was whether it would be sustainable in terms of its location. The appeal was dismissed after it was considered the appeal site was in an inaccessible location against the policy and 'Accessibility Assessment' Supplementary Planning Guidance.

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

### 3. Sustainability Appraisal Monitoring

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

Objective Number	Sustainability Objective
1	<p><b>Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well-being.</b></p> <p>Figures from Stats Wales for “Work place employment by Welsh Local Authority areas and broad industry” indicate that the medium trend since (2001-2012) for employment rates in agriculture, forestry and fishing in Pembrokeshire is increasing.</p> <p>In 2011 Pembrokeshire County Council released “The State of Wildlife in Pembrokeshire” (on behalf of the Pembrokeshire Biodiversity Partnership); The report suggested that biodiversity associated with agriculture is generally in decline (though there are some improvements in arable habitats). No further updates to this report have been released but it is hoped that a new report will be prepared in time for the next Annual Monitoring Report.</p> <p>Overall the information available suggests that the trend for growth in the agricultural sector that has been experienced in the past may have been to the detriment of biodiversity. However, there is 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. No proposals for residential development in a remote location were approved during this monitoring period (contrary to Policy 7 of the Local Development Plan)</p> <p>Achievement of this Sustainability Objective will depend largely on activity outside the Local Development Plan. Commentary for Sustainability Appraisal Objective 13 indicates that generally, within the scope of the Local Development Plan, community facilities are being retained and enhanced.</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 place, largely due to increased impact of road traffic. There have been no updates to this data during this monitoring period for comparison.</p> <p>The adoption of the Landscape Character Assessment Study (July 2011) and Conservation Areas (October 2011) Supplementary Planning Guidance has helped to identify suitable enhancements as well as developments that would be out of character with the landscape or townscape of the National Park.</p> <p>In 2013 the Authority adopted new Supplementary Planning Guidance on Seascapes, which provides more detailed guidance on how Policies 8 (Special Qualities) and 15 (Conservation of Pembrokeshire Coast National Park) are applied. This new guidance helps to address seaward development</p>

Objective Number	Sustainability Objective
	<p>impacts by dividing the National Park into 12 character areas and identifying their sensitivities.</p> <p>Supplementary Planning Guidance on the Cumulative Impact of Wind Turbines was adopted during this monitoring period, which aims to address the issue of multiple wind turbine proposals and associated landscape impacts. This should help to reduce the landscape impacts of wind turbine developments.</p> <p>Partnership work with Pembrokeshire County Council and Carmarthenshire County Council has continued during this monitoring period to record renewable energy developments. This work has now resulted in comprehensive GIS data sets detailing the scale and location of wind turbine and large scale ground mounted photovoltaic developments. These datasets are available to the public for review and to officers and applicants to assist in assessing the cumulative landscape impacts.</p> <p>The LANDMAP resource records and evaluates landscape characteristics, qualities and influences as a nationally consistent data set, primarily used for planning related purposes. In order to maintain the validity and currency of LANDMAP the mapping and survey information must be updated. This information will also be useful for the statutory review of Protected Landscape Management Plans. During 2013-14 Natural Resources Wales has been completing the first stages of monitoring the Visual &amp; Sensory layer in the National Park to identify LANDMAP aspect areas where significant landscape change has been identified between 2001/3 and 2013. The Authority has been involved in the selection of these areas. The next stage is to conduct fieldwork in the form of site visits to the aspect areas prior to their final update.</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 cycle ways or footpaths. Policy 52 requires new development to include appropriate access for walkers and cyclists.</p> <p>No developments have received planning approval without providing appropriate access for cyclists and pedestrians during this monitoring period indicating that the Local Development Plan is contributing positively to this sustainability appraisal objective.</p>
5	<p><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 adding substantively the overall provision) will help to do this.</p>

Objective Number	Sustainability Objective
	<p>Approvals for self-catering accommodation since adoption of the plan help meet the aim to improve the suitability of accommodation for year round use, though they also increase the overall provision. Therefore the planning contribution to this Sustainability Objective can be seen as mixed. During this monitoring period 4 applications for the construction of or conversion of existing builds to self-catering units were approved. This is consistent with the objective of not adding substantively to overall provision. Commentary is provided under Indicator 18 where a development of 18 self catering units were approved contrary to the Local Development Plan. The commentary includes reasons why the Committee considered it appropriate to approve.</p>
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 2013 – 31st March 2014).</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 their lowest since 1992. It is likely that the reduction in residential emissions was 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>Revised national planning policy, together with the new Building Regulations (Part L) should lead to energy efficiency improvements in all builds within the National Park. Local Development Plan Policy 29 will continue to provide a local policy on promoting sustainable design in all development (see Chapter 2 C). Local Development Plan.</p> <p>During the 2013/2014 monitoring period five applications for renewable energy schemes have been approved, this is a significant reduction on the 2012/2013 figure of 21. However, there has been a significant reduction in the number of planning applications being submitted for renewable energy schemes, 14 in 2013/14 from 29 in 2012/13. This is possibly a result in changes to the feed in tariff rates. Over recent months there has been a dramatic reduction in the frequency of applications for wind turbines both in the National Park and the wider county. There has however been a rise, in recent months, in applications for ground mounted solar arrays. Eight applications for renewable energy schemes have been refused during this monitoring period, these refusals have been on the grounds of unacceptable landscape impacts to the National Park and a lack of information to fully consider proposals. The Local Development Plan is, currently, well on</p>



Objective Number	Sustainability Objective
	<p>schedule to meet its target of 4.91GWh of electricity from renewable sources with a current estimate of 3.54GWh if all permissions granted are implemented.</p> <p>At present the Local Development Plan is falling short of its target for renewable heat generation (see commentary under indicator 12b) at only 3.2GWh of the 26GWh hoped to be achieved in the lifetime of the plan. This is due to a lack of planning applications for e.g. biomass boilers the popularity of which is influenced by grants, schemes and initiatives external to the planning process over which the Local Development Plan has limited influence.</p>
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 has been stalled by current market/economic conditions and is currently falling short of the target set out in the Local Development Plan (See the analysis and conclusions under indicator 22 for details). As an interim measure the National Park Authority has commissioned and completed updated affordable housing supplementary planning guidance that aims to streamline the planning process for affordable housing, the guidance has also re-examined the expectation of provision geographically and reduced it accordingly to better take into account recent economic conditions. These measures should help to improve affordable housing provision until the policy can be examined in detail at Local Development Plan Review stage.</p> <p>During the 2013/14 monitoring period significant progress on sites allocated for mixed residential and commercial uses has been achieved. Most notably the site of the former Royal Gatehouse Hotel in Tenby, and the former site of the Cambrian Hotel in Saundersfoot are now nearing completion.</p> <p>The Local Development plan can also influence the local economy the application of policy to planning proposals for commercial activities from building of market housing to the construction of a microbrewery. During this monitoring period the Authority received 175 commercial planning applications, which accounted for just over a third of all applications. Of these 131 were approved, 107 were delegated and were approved in under 8 weeks. The remaining applications went to committee for democratic approval.</p> <p>In conclusion the Local Development Plan is contributing positively to the local economy throughout the park by providing policy framework for the approval of small scale commercial activities but most prominently by the progress of mixed use developments allocated in the plan in Tenby and Saundersfoot. The effect of the plan on the Sustainability Appraisal objective from an affordable housing perspective is mixed. Whilst the plan is making small positive contributions through the collection of monetary affordable housing contributions on single dwellings the plan is not achieving its overall targets for affordable housing provision (units), which may negatively affect the sustainability of communities in the National Park in the long term. Policy 45 on Affordable Housing will be re-examined at Local Development Plan review stage, commencing 2015, to look for ways to address this issue.</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</p>

Objective Number	Sustainability Objective
	help in meeting this objective. During the monitoring period (April 1st 2013 and March 31st 2014) no application linked to this policy was approved or refused.
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% (3.9%) are identified as being at any degree of risk. There seems to be significant potential for the uses of listed buildings to change – 3 listed building consents for change of use were granted between April 1<sup>st</sup> 2013 and March 31<sup>st</sup> 2014.</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>No new quarries or extensions to existing quarries have been approved during the monitoring period (April 1st 2013 and March 31st 2014).</p> <p>A Periodic Review application to review planning conditions for Carew Quarry was made to the Authority in December 2012 and is still on-going .</p> <p>The making of a Prohibition Order to prevent the resumption of mineral working at Penberry Quarry, with restoration conditions requiring demolition of the existing buildings on site, was approved by the Development Management Committee in January 2014. The Order has been publicised and submitted to the Welsh Government for confirmation.</p> <p>The Authority has recently received an application for the Review of Mineral Planning Conditions (ROMP) under the Environment Act 1995 at Syke Quarry and is currently being determined.</p>
12	<p><b>Reduce the negative impacts of waste.</b></p> <p>The percentage of municipal waste collected for reuse, recycling or composting across Pembrokeshire was 52.9% in 2012/13 (an increase of 2.9% on 2011/12), this figure is part of a consistent pattern of increasing levels of reuse, recycling and composting since 2008/09</p> <p>Incidents of recorded fly-tipping in Pembrokeshire decreased between 13% between 2006/7 and 2010/11. However, the period of 2011/12 has seen an increase in the incidence of fly tipping of 13.4% (a return to 2006/7 levels).</p> <p>2012/13 records indicate that there has been a small reduction on the 2011/12 frequency of fly tipping in the County.</p>
13	<b>Community facilities (including health &amp; social care facilities, social</b>

Objective Number	Sustainability Objective
	<p><b>facilities and retail provision) continue to meet the needs of the National Park population.</b></p> <p>The provision and retention of community facilities is affected, largely, by factors beyond the scope of the Local Development Plan. However the Local Development Plan can help to retain community facilities through the application of Policy 48. It can also contribute through granting planning applications for the construction of new facilities or the improvement of existing facilities.</p> <p>During the 2013 – 2014 monitoring period no applications were approved that would result in the loss of a community facility (contrary to Policy 48), and five applications were approved for the improvement of existing community facilities e.g. renovation work at the Rhos and District Village Hall.</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 three-lobed 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 hedge banks 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 hedge banks is particularly relevant as these habitats comprise over half of the National Park area. Hedge bank decline is linked to land use 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 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 along with the sustained efforts of the National Park Authority's Conservation and Delivery teams, who carry out conservation management activities and monitoring on approximately 200 sites inside of the National Park and, where opportunities exist to improve habitat connectivity, outside of the park.</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 2013 and March 31st 2014. No developments have received planning approval that were not compatible with this policy. Additionally, during the monitoring period, 15 planning applications have been approved that included measures to promote biodiversity gain. These included applications where</p>

<b>Objective Number</b>	<b>Sustainability Objective</b>
	<p>there were no protected species issues found on site but mitigation measures for e.g. bats were included anyway; and applications where features such as bat boxes were included as good practice</p> <p>It is considered that the Local Development Plan is making positive contributions to the SA Objective.</p> <p>The adoption of the new British Standard for biodiversity should help to further future proof the Local Development Plan in the minimisation of the impacts of development to biodiversity.</p>
15	<p><b>Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.</b></p> <p>Recent communication with Dwr Cymru/Welsh Water (May 2014) has indicated that neither the provision of water resources or of sewerage should be considered to be a constraint to development, no specific concerns have been raised for existing development or new development within the Local Development Plan.</p> <p>There are 10 blue flag beaches in the National Park in 2014 (one less than 2013), and a further 12 (13 in 2011) green coast award winning beaches (covering more remote, rural beaches).</p> <p>A Water Framework Directive Local Evidence package for Pembrokeshire Coast National Park prepared by Natural Resources Wales (April 2014) identified that 100% of the surface water bodies in the National Park were achieving 'Good' chemical status in 2013, whilst only 19% of surface water bodies were achieving 'Good' ecological status. The vast majority (78%) of surface water bodies achieved 'Moderate' ecological status and a further 3% were found to be in 'Poor' ecological status. These results represent a new method of assessing water bodies which supersedes the old General Water Quality Assessments, further data collated under this new methodology will be required to establish any new trends in water quality in the National Park</p>

## Appendix 1 Supplementary Planning Guidance

Title	Current Status
Accessibility	Adopted June 2013
Affordable Housing (Replacement Guidance)	Operational from July 1 <sup>st</sup> 2014  Consultation ends 26 <sup>th</sup> September 2014
Archaeology	Adopted June 2011
Coal Works – Instability	Adopted June 2011- Technical update May 2014
Conservation Area Proposals <sup>26</sup>	October 2011
Landscape	Adopted June 2011
Loss of Hotels	Adopted June 2011
Low Impact Development	Adopted June 2013
Parking	Adopted June 2011
Planning Obligations	Adopted June 2011
Recreation	Adopted December 2012
Regionally Important Geodiversity Sites	Adopted October 2011
Renewable Energy  Addendum to the Renewable Energy on Field Arrays <sup>27</sup>	Adopted October 2011  Adopted June 2012  Technical update April 2014
Safeguarding Mineral Zones	Adopted June 2011  Technical update June 2014
Seascape Character	Adopted December 2013
Shopfront Design	Adopted October 2011
Siting and Design of Farm Buildings	Adopted June 2012
Sustainable Design	Adopted June 2011 (updated December 2013)

<sup>26</sup> Angle, Caerfarchell, Caldey Island, Little Haven, Manorbier, Newport and Newport Parrog, Portclew, Porthgain, Saundersfoot, Solva, St David's Trefin, Tenby.

<sup>27</sup> Now incorporated in the Renewable Energy Supplementary Planning Guidance

Title	Current Status
The Cumulative Impact of Wind Turbines	Adopted December 2013
WITHDRAWN - Building Extensions	Adopted June 2011
WITHDRAWN - Validation + Interim Statement (October 2011)	October 2009

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

## Appendix 2 Changes to the approach taken with affordable housing

The new guidance brings forward improvements to the planning application process to help landowners and developers have a more effective dialogue with the Authority on housing matters and also to contribute positively to the provision of affordable housing.

This appendix sets out the main changes in the Supplementary Planning Guidance and provides comparisons and examples of how these changes will affect housing sites already allocated in the local development plan and new housing sites.

### Main Changes:

#### 1. Housing sub-market areas

For new housing sites (those not already allocated in the plan) and single dwelling applications, the new Supplementary Planning Guidance introduces a more flexible regional approach to the application of Policy 45 (Affordable Housing) of the Local Development Plan by varying the percentage or financial affordable housing contributions regionally.

This is done by dividing the National Park area into housing sub market areas, which group areas with similar housing market conditions together to take into account the market values achievable in those areas and the effect that has on development viability.

For more details on these sub market areas please see paragraph 3.16-3.17 and table 3.1 on page 11 of the [Affordable Housing Delivery Project Report](#), which is available to view on our website.

The following table sets out the percentage provision and rate of affordable housing contribution that Pembrokeshire Coast National Park Authority considers reasonable for each of the housing sub-market areas now as opposed to when the percentage was originally set when the Local Development Plan was adopted.

**TABLE 1 SUBMARKET AREAS**

Sub-market housing area	Local Centre	Rural Centres	New Percentage of affordable dwellings required on site	New financial contribution for single dwellings Rate (m <sup>2</sup> )	Percentage under Policy 45 of affordable dwellings required on site	Other
Newport	Newport	Dinas Cross	50%	£250	70% (100% in Dinas Cross)	£2
Tenby	Tenby	Milton, Manorbier, Manorbier Station, Jameston	50%	£250	60%	£2
South East Coast	Saundersfoot	New Hedges, Pleasant Valley; Amroth; Summerhill	30%	£150	60%	£2
Estuary Hinterland	N/A	Lawrenny, Hook; Llangwm, Houghton	20%	£100	50%	£2
South West Coast	N/A	Bosherston, Angle	20%	£100	50%	£2
North East NP	Crymych	Felindre Farchog	20%	£100	50%	£2
St Brides Bay	N/A	Little Haven; Broad Haven; Dale; Marloes; St Ishmaels, Herbranston	30%	£150	50% (80% in Dale)	£2
St Davids and North Coast	St David's	Roch, Newgale, Solva, Trefin; Square and Compass	30%	£150	50%	£2

\*As of October 2013



## 2. Local Development Plan Allocations

Appendix 5 of the [new SPG](#), shows the results of updated viability assessments for the Local Development Plan site allocations and provides a RAG (Red-Amber-Green) colour score to indicate whether or not a site is viable at a given percentage provision of affordable housing and Acceptable Cost Guidance rate (ACG)<sup>28</sup>. Viability is determined by a threshold for Residual Land Value per hectare, Pembrokeshire Coast National Park Authority considers a site to be viable if it meets a residual value per hectare of £300,000 or more.

The table below provides a comparison between the affordable housing percentages for housing and mixed use site allocations set out in the Local Development Plan under Policy 42 and Policy 45 and those percentage provisions found to be viable after new viability assessments were carried out to inform the new Supplementary Planning Guidance.

**TABLE 2 ALLOCATIONS**

Site ID	Settlement	Site name	New percentage assuming 55% ACG	'Old' percentage affordable housing provision (LDP Policies 42 and 45)
HA377	Tenby	Brynhir	50%	60%
HA723	Tenby	Former cottage Hospital Site	50%	60%
HA724	Tenby	Rectory Car Park	50%	60%
HA727	Tenby	West of Narberth	50%	60%
HA752	Tenby	Butts Field Car park, Tenby	50%	60%
HA760	Tenby	Reservoir Site, Tenby	50%	60%
HA825	Newport	North of Feidr Eglwys	40%	70%
HA385	St David's	North of Twr-y-Felin	40%	Current permission for 0 affordable/ renewal 50%
HA737	St David's	St David's West Glasfryn Road	30%	50%
HA789	St David's	Adj Ysgol Bro Dewi, Nun Street	20%	50%
HA734	Broad Haven	South of Driftwood Close	40%	50%
HA382	Dale	Castle Way	30%	80%

<sup>28</sup> % of the total cost of construction prices used by housing associations.

Site ID	Settlement	Site name	New percentage assuming 55% ACG	'Old' percentage affordable housing provision (LDP Policies 42 and 45 )
HA387	Dinas Cross	Opposite Bay View Terrace	50%	100%
HA732	Herbrandston	East of Herbrandston	Not viable	50%
HA436	Jameston	North of Landway Farm	40%	Current permission for 1 affordable/ renewal 50%
HA730	Jameston	Opposite Bush Terrace	30%	50%
HA821	Jameston	Green Grove	40%	50%
HA559	Lawrenny	Adjacent Home Farm	40%	50%
HA848	Manorbier Station	Field opp Manorbier VC School	20%	50%
HA813	New Hedges	Rear of Cross Park	20%	60%
HA384	Solva	Adjacent to Bro Dawel	30%	50%
HA792	Solva	Bank House, Whitchurch Lane	20%	50%
HA738	Trefin	North of Heol Crwys	20%	50%
MA710	Tenby	Sergeants Lane, Tenby	40%	60%
MA776	Broad Haven	Land at Broad Haven north east of Marine Road	30%	37%
MA895	Manorbier Station	Land part of Buttylands, Manorbier Station	40%	50%
MA773	St Ishmaels	Adjacent to School, St Ishmaels	30%	50%

## Appendix 2 Site Specific Monitoring

### Key to Table 1

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

**Table 1 Allocations that include housing**

	<b>Location Proposals Map ID</b>	<b>Site Name and Location</b>	<b>Total number of Units<sup>29</sup></b>
1.	Broad Haven HA734	South of Driftwood Close	8
2.	Broad Haven MA776	Land north east of Marine Road	35
3.	Crymych HA750	Depot Site	18
4.	Dale HA382	Castle Way	12
5.	Dinas Cross HA387	Opposite Bay View Terrace	12
6.	Herbrandston HA732	East of Herbrandston Hall	12
7.	Jameston HA436	North of Landway Farm	6
8.	Jameston HA730	Opposite Bush Terrace	35
9.	Jameston HA821	Green Grove	5
10.	Lawrenny HA559	Adj Home Farm	30
11.	Manorbier Station HA848	Field opp Manorbier VC School	19
12.	Manorbier Station MA895	Land part of Buttylands	15
13.	New Hedges HA813	Rear of Cross Park	30
14.	Newport HA825	North of Feidr Eglwys	20
15.	Saundersfoot MA777	Rear of Cambrian Hotel, Saundersfoot	28
16.	Solva HA384	Adj Bro Dawel	18
17.	Solva HA792	Bank House, Whitchurch Lane	12
18.	St David's HA385	North of Twr-y-Felin	13
19.	St Davids HA737	West of Glasfryn Rd	90
20.	St David's HA789	Adj Ysgol Bro Dewi, Nun Street	10
21.	St Ishmaels MA733	Adj School	40
22.	Tenby HA377	Brynhir	168
23.	Tenby HA723	former cottage Hospital Site	10
24.	Tenby HA724	Rectory Car Park	50
25.	Tenby HA727	West of Narberth Road	25
26.	Tenby HA752	Butts Field Car park, Tenby	80
27.	Tenby HA760	Reservoir Site, Tenby	12
28.	Tenby MA706	Upper Park Road, Tenby	14

<sup>29</sup>Reflects number of units granted planning permission  
Pembrokeshire Coast National Park Local Development Plan

	Location Proposals Map ID	Site Name and Location	Total number of Units <sup>29</sup>
29.	Tenby MA707	White Lion St/Deer Park, Tenby	48
30.	Tenby MA710	Sergeants Lane, Tenby	5
31.	Trefin HA738	North of Heol Crwys	15
	Total		895

### Key to Tables 2,3 and 4

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

**Table 2 Allocations of Employment/Mixed Use Sites (not including housing)**

Location/ Proposals Map ID	Site Name	Proposed Use	Monitoring
Newport MA232	Land adjacent to the Business Park, Feidr Pen y Bont	Mixed (Live/Work Units)	Not implemented. Planning permission granted in May 2009 for a new factory unit on proportion of this land.
St David's EA748	South of St Davids Assemblies	Employment B1, B8, Local Waste Management Facility	Not implemented.
St David's MA746	Between Glasfryn Road and Millard Park, St Davids	Mixed (Live/Work Units)	Not implemented.

**Table 3 Community Facilities**

Site Ref	Site Name & Location	Use	Monitoring
CP829	Land at Saundersfoot Railway Station, Pentlepoir	Car park	Some pre application discussions have taken place. No further update for the 2014 Annual Monitoring Report.
CP828	Manorbier Station	Car park	Application NP/13/82 granted for 5 parking spaces; 1 disabled space, cycle parking and directional signs. Not implemented.

**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	Design will involve a displacement of the carriageway to the east to create sufficient space for the path within highway limits on the west side. Ecological and land issues have proved to be protracted. Scheme now on course to start Autumn 2014.
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. No progress to date.
RI5	Gumfreston to Tenby Phase 3	Automatic flood warnings will be installed later this year.
RI6	Glasfryn Lane, St Davids	Not implemented. Pembrokeshire County Council have completed a preparatory design works study and are considering submission of a Local Transport Fund bid to enable works to start in 2015/16, if successful. This will initially require local approval, City Region approval and identification of funding for land acquisition.
RI7	A40 Canaston Bridge	Scheme completed and road opened on 16 <sup>th</sup> March 2011.