

# **Pembrokeshire Coast National Park Authority**

## **Annual Monitoring Report**




**for the Pembrokeshire Coast National Park Local  
Development Plan Adopted September 2010**

**27<sup>th</sup> September 2017**


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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 2016 to end of March 2017.
- 1.2. The findings of the Annual Monitoring Reports of 2011, 2012, 2013, 2014, 2015 and 2016 have been considered by the National Park Authority. The Reports have also considered the Plan's achievement of its sustainability objectives. These reports have fed into the preparation of the National Park Authority's Review Report for the Local Development Plan and the draft replacement Preferred Strategy for the Plan. The revision process will continue to take account of emerging issues arising from future Annual Monitoring Reports.
- 1.3. Changes needed to address issues identified in the 2011 to 2015 Annual Monitoring Reports have already been discussed and identified in the Review Report and are therefore not repeated in this Annual Monitoring Report. However, if the issue arises again under this reporting period the Annual Monitoring Report will highlight that the issue is being addressed as part of the preparation of the replacement Local Development Plan with a cross reference to the Review Report.
- 1.4. No additional changes to policy are required as a result of this monitoring report.
- 1.5. The tables below provide a visual aid of the effectiveness of policies during this Annual Monitoring Report period 2016-2017 using the 36 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.	26	
Targets have not been achieved or poor performance, but no concerns over implementation of policy / objectives - see below for a summary of the issues.	3	
Monitoring indicates area of concern over implementation of policy / objectives.	7	

### Indicator 12b Renewable Heat Target


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	

Policy Area		Indicator 12b	Target	Performance
			GWh.)	
The Local Development Plan Review Report identifies that change is needed to address this issue.				


### Indicator 13 Development in a Floodplain

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 in Indicator 13.	
<b>Conclusion:</b> The policy context set out in Technical Advice Note 15 and the Local Development Plan is being applied by Authority Officers but there appears to be a different approach being taken by Natural Resources Wales. Clarification needs to be sought.				


### Indicator 17 Visitor Accommodation

Policy Area		Indicator 17	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.	
The Local Development Plan Review Report identifies that change is needed to address this issue.				




## Indicator 20 Effectively Available Housing Land Supply

Policy Area		Indicator 20	Target	Performance
Housing	W <sup>1</sup>	The housing land supply taken from the current Housing Land Availability Study (TAN1)	Minimum 5 years supply.	
The Local Development Plan Review Report identifies that change is needed to address this issue.				


## Indicator 21 Affordable housing and housing delivery

Policy Area		Indicator 21	Target	Performance
Housing	W	The number of net additional affordable and general market dwellings built. (TAN 2)	530 affordable dwellings over the plan period.  1000 general market dwellings built. In total an annual completion rate of 90 per annum.	Actions are proposed to improve delivery  style="text-align: center;"> 
The Local Development Plan Review Report identifies that change is needed to address this issue.				


## Indicator 22 Development of Site Allocations

Policy Area		Indicator 22	Target	Performance
Site Allocations	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	Allocations – 100% permitted by the end of the Plan period on allocated sites.	Housing (22a)  style="text-align: center;"> 
				Employment/Mixed use (22b)  style="text-align: center;"> 
				Community Facilities (22c)  style="text-align: center;"> 

<sup>1</sup> Welsh Government Core Indicator

Policy Area	Indicator 22	Target	Performance
	permitted (ha and units).		Road & Cycle Schemes (22d) 
The Local Development Plan Review Report identifies that change is needed to address this issue.			

### Indicator 27 Open Space and Greenfield Land

Policy Area	Indicator 27	Target	Performance
Policy16	W Amount of greenfield and open space lost to development (ha) which is not allocated in the Plan.	Greenfield - 0 % except for exceptional land released for affordable housing or community facility provision.  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 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> Nineteen planning applications were approved which included the development of greenfield land during the monitoring period. This amounted to the development of 5.36ha of greenfield land.</p> <p>Of the 19 applications:</p> <ul style="list-style-type: none"> <li>▪ 1 was for a One Planet Development Proposal;</li> <li>▪ 2 were for campsites, which were granted Certificates of Lawfulness;</li> <li>▪ 4 were for agricultural workers or rural enterprise workers which met with national policy justification;</li> <li>▪ 5 were for agricultural buildings;</li> <li>▪ 1 was for a birds of prey attraction within an existing attraction grounds;</li> <li>▪ 1 was a farm-diversification proposal for a new-build holiday-let;</li> </ul>			

- 3 were bases for mast structures and ancillary equipment;
- 1 was for the use of land identified as open space to be developed for visitor accommodation. The precedent was established by a previous application on this site.

**Conclusion:** All of the applications for development of greenfield sites met with the policies of the Local Development Plan and/or national planning policy. One application was granted permission on land which had been identified in the Local Development Plan as Open Space, as it had been used for that purpose prior to the adoption of the Plan. The land was subsequently purchased and not open to the public and had no value in amenity terms as it was not generally visible from public view points. The open space assessment also found there to be adequate recreational space within the village. The land was first granted planning permission for development in 2011.

## **Sustainability Appraisal**

- 1.6. An analysis of how the Plan is contributing to the sustainability appraisal objectives can be found in Chapter 3.
- 1.7. 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.

## **Consultation and Further Information**

- 1.8. 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 2017 document are invited and will inform the production of the next report in 2018 and the Local Development Plan revision. 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 01646 624800  
email [devplans@pembrokeshirecoast.org.uk](mailto:devplans@pembrokeshirecoast.org.uk)

## **Consultation on the 2016 Monitoring Report**




- 1.9. The 2016 Monitoring Report was made available for comment to relevant statutory bodies, stakeholders and individuals and was published on the Authority's web site. No adverse comment was received.

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

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

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

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

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

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

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



## National Park Purposes and Duty and the Spatial Strategy


### Key Outcomes


- (1) Development takes place in accordance 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 Future Landscapes: Delivering for Wales May 2017:** Advice has been sought from Welsh Government regarding the implications of this document for land use planning. Initial advice is that there will be no change to national planning policy as a result of its publication.


### Policy Performance


Policy Area		Indicator 1	Target	Performance
All		Approvals contrary to recommendation.	0 approvals contrary to recommendation	
<p><b>Trigger:</b> 3% of planning applications<sup>2</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 2016 to March 2017 550 planning applications were determined by the Authority. 0.4% of applications (2) were approved contrary to recommendation.</p> <p><b>Conclusion:</b> The Authority's application of policy positively supports the strategy of the Plan and achievement of 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-	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>	

<sup>2</sup> Full, outline or reserved matters applications.

	economic duty in National Parks must be in pursuance of the purposes to Policy 1 ( <b>overarching indicator</b> ).		
<p><b>Trigger:</b> 0 applications 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 2016 and 31 March 2017 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> There were no applications approved contrary to policy 35c) during this monitoring period.</p> <p><b>Conclusion:</b> The Authority's application of policy positively supports the strategy of the Plan and achievement of its key outcomes.</p>			

Policy Area	Indicator 3b	Target	Performance
Policy 42d) & Policy 44 third last paragraph	Policy 42d) & Policy 44 third last paragraph - Prioritise community uses or affordable housing when re-using employment sites.	0 approvals contrary to policies seen to protect and provide for community facilities and infrastructure	

<p><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 any 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 during 2016 to 2017 monitoring period.</p> <p><b>Conclusion:</b> The Authority's application of policy positively supports the strategy of the Plan and achievement 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 21 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 25.				

Policy Area		Indicator 4	Target	Performance
Policy 2 to 7		Effectiveness of Policies (Policy 2 to 7) & Supplementary Planning Guidance	Inspector does not raise issues regarding the effectiveness of the policies or supporting	

	(Accessibility Assessment) when dealing with Applications at Appeals.	supplementary planning guidance.	
<p><b>Analysis:</b> In the period April 2016 to March 2017 three appeal decisions cited Local Development Plan policies, none cite Supplementary Planning Guidance within this group. All three decisions were dismissed with no question into the effectiveness of the cited policies by the Inspectors.</p> <p><b>Conclusion:</b> There is no evidence to suggest the policies and guidance in this grouping are not performing at appeals.</p>			

## 2A Special Qualities

### Key outcome

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


### Context


**2.5 Future Landscapes: Delivering for Wales May 2017** Advice has been sought from Welsh Government regarding the implications of this document for land use planning. Initial advice is that there will be no change to national planning policy as a result of its publication.

**2.6 Historic Environment:** Planning Policy Wales Edition 9 (November 2016) includes a revised Chapter 6 The Historic Environment. This chapter was revised in conjunction with Cadw following Royal Ascent of the Historic Environment (Wales) Act 2016. Updates take into account Cadw's Conservation Principles for the sustainable management of the historic environment and how the historic environment contributes to the well-being goals set out in the Well-being of Future Generations (Wales) Act 2015.

**2.7** Further guidance has subsequently been provided in a new Technical Advice Note 24: The Historic Environment (May 2017), which replaces three Welsh Office Circulars on the Historic Environment. This new Technical Advice Note provides guidance on how the planning system considers the historic environment, with specific chapters on components such as Listed Buildings, Conservation Areas and Archaeological Remains.

### Policy Performance

Policy Area	Indicator 5	Target	Performance
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 2016 to 31<sup>st</sup> March 2017, no approvals were given contrary to recommendation which referred to Policy 8.</p> <p><b>Conclusion:</b> No approval has been given contrary to Strategy Policy 8 Special Qualities. The target for this monitoring period has been met.</p>			

Policy Area	Indicator 6	Target	Performance
Policy 8 to 18	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 2016 to March 2017, four appeal decisions cited Local Development Plan policies (one of which for an Enforcement Notice), none cited Supplementary Planning Guidance within this group. All four decisions were dismissed with no question into the effectiveness of the cited policies by the Inspectors. An Inspector did disagree with the Authority's consideration that the landscape and visual impact of an eco-dwelling would be unacceptable; however this is the result of a difference in planning judgement. The appeal was dismissed for failing to meet the requirements of other local and national planning policy.</p> <p><b>Conclusion:</b> There is no evidence to suggest the policies and guidance in this grouping are not performing at appeals.</p>			

## 2B Major development, the potential for growth

### Key outcomes


- (1) No new major development in the National Park unless there are exceptional circumstances.<sup>3</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

**2.8 Minerals:** Major infrastructure projects that may put additional pressure on existing reserves include the Swansea Tidal Lagoon, The Circuit of Wales and Cardiff area proposals such as the Metro link and Airport link, the M4 relief road, City Region projects and Hinckley Point power station. However, progress on these projects is uncertain; they are not expected to come forward for development in the immediate future. The annual monitoring of reserves and the review of the Regional Technical Statement for the North and South Regional Aggregate Working Parties (due by August 2019) will continue to inform planning decisions on a regional and national basis.


**2.9 Marine planning:** Welsh Government is developing a Welsh National Marine Plan (WNMP), a single plan for inshore and offshore Welsh waters. The UK's Marine Policy Statement (March 2011) provides the high level context for the Welsh National Marine Plan. The Marine Policy Statement states that marine planning systems will sit alongside and interact with existing planning regimes – including local development plans - across the UK. An initial draft Welsh National Marine Plan and a sustainability appraisal of emerging policies was made available for public comment in November 2015. A consultation draft Welsh National Marine Plan is anticipated in August 2017.


### 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.	
<b>Trigger:</b> Approval of 1 major development where no exceptional circumstances			

<sup>3</sup> See [Planning Policy Wales, Edition 9, November 2016](#), paragraphs 5.5.6 and 14.3.2; Minerals Technical Advice Note 1: Aggregates 2004, paragraph 52; Mineral Technical Advice Note (MTAN) Wales 2: Coal, paragraphs 74 to 79, page 159, Circular 125/77 Roads and Traffic – National Parks.

Policy Area	Indicator 7	Target	Performance
are shown in any one year.			
<b>Reason:</b> To ensure a consistent approach with first purpose and Planning Policy Wales Major Development test.			
<b>Analysis:</b> Between April 1 <sup>st</sup> 2016 and March 31 <sup>st</sup> 2017 no application for a major development, as defined in Planning Policy Wales was approved.			
<b>Conclusion:</b> There are no issues arising regarding the policy framework of the Plan.			

Policy Area	Indicator 8	Target	Performance
Minerals	Applications for minerals development	0 approval for new minerals development unless exceptional circumstances are proven.	
<b>Trigger:</b> 1 new or extended mineral site permitted when exceptional circumstances are not shown in any one year.			
<b>Reason:</b> This would have a major impact on the minerals strategy. The trigger would not include borrow pits.			
<b>Analysis:</b> There have been no approvals from April 2016 to March 2017 for a new or extended mineral site.			
<b>Conclusion:</b> There are no issues arising.			

Policy Area	Indicator 9	Target	Performance
Policies 19 to 28	Effectiveness of Policies (Policies 19 to 28) & Supplementary Planning Guidance (Land Instability from coal workings Safeguarding Minerals,) when dealing with Applications at Appeals	Inspector does not raise issues regarding the effectiveness of the policies or supporting supplementary planning guidance.	



**Analysis:** In the period April 2016 to March 2017 one appeal decision cited Policy 20 Scale of Growth in relation to the refusal of a residential development of 27 units. The appeal was dismissed and there was no question of the effectiveness of this Policy by the Inspector.

**Conclusion:** There is no evidence to suggest the policies and guidance in this grouping are not performing at appeals.

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

### Key outcomes

- a) Development achieving high standards in terms of sustainable design. With all new dwellings meeting the standards set out in national planning policy.<sup>4</sup>
- b) The National Park contributing to renewable energy generation.<sup>5</sup>
- c) No vulnerable development<sup>6</sup> in areas which would be at risk of flooding both now and in the long term and with no negative impacts elsewhere.

### Context

2.10 **Targets for Renewable Energy:** The targets within Indicators 12a and 12b were derived from a study entitled 'Development of a Renewable Energy Assessment and Target Information for the Pembrokeshire Coast Local Development Plan' (2008). This study has been updated. The updated study concludes that, for technologies that would require planning permission, the generation potential of renewable electricity within the National Park has significantly increased and the potential for renewable heat energy has significantly decreased from the 2008 estimates. This will be reflected in the revised Indicators 12a and 12b for the replacement Local Development Plan.

### 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 the replacement Local Development Plan Policy 29 Sustainable Design is being drafted, to enable a meaningful monitoring of the policy in contributing towards sustainable design in all development.</p>			

<sup>4</sup> The Welsh Government expects the required standards to be made progressively higher over time, in pursuit of its aspiration for all new buildings to be "carbon neutral" by 2011.

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

<sup>6</sup> 'Vulnerable developments' are defined in the Technical Advice Note 15: Development and Flood Risk on flooding, please see Figure 2 page 7: web link [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)

Policy Area		Indicator 11	Target	Performance
Sustainable Design Policy 29		Compliance with code for sustainable homes <sup>7</sup>	Target - 100% meeting national policy requirements	N/A
<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/Conclusion:</b> This indicator is no longer relevant for this monitoring period, due to the changes to national planning policy. A revised indicator for the replacement Local Development Plan Policy 29 Sustainable Design is being drafted, 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 4.91GWh.	
Policy Area		Indicator 12b	Target	Performance
Renewable Energy Policy 33		As above for Indicator 12a	(Target - Planning permissions to contribute to an overall Renewable Heat Target for the National Park of 26 GWh <sup>8</sup> .)	

<sup>7</sup> This includes better management of surface water run-off to cope with the impacts of climate change.

<sup>8</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 monitoring framework will require amendment to reflect this change in the replacement Local Development Plan. Please also see commentary in the context section above.

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

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


**Analysis:** Electricity Generation Gwh (estimate) equals an estimated 7.79 Gwh if all the permissions granted since 2006 are implemented. This is an increase of 0.179 Gwh from the previous monitoring period. The proposals are primarily for solar photovoltaics that have been incorporated into building design (0.132Gwh). There has also been a small contribution of micro scale wind (0.047Gwh).


Heat Generation per annum Gwh (estimate) equals an estimated 4.235 Gwh primarily from solar thermal panels, this is an increase of 0.175 Gwh from the previous monitoring period from biomass boilers. The 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 is overriding environmental or amenity issues. An analysis of approvals versus refusals shows that since 2006 there have been an estimated 32 refusals of permission and 175 approvals for various types of renewable energy. This is an increase of 11 approvals and no refusals from the previous monitoring period. However Local Development Plan Policy 33 was only quoted in a total of 6 decisions in this monitoring period, the majority of the approved applications were for schemes which incorporated renewable energy technology as part of a wider proposal.



**Conclusion:** The Plan has exceeded the electricity generation target (if all those with permission are assumed to have been constructed) but remains significantly behind on heat generation. The sum of estimated contributions from solar thermal, biomass and heat pumps have formulated the above heat generation target. The updated study referred to in the Context section of this Chapter will inform updates to Indicators 12a and 12b in the replacement Local Development Plan. Development interest for solar panels, biomass and anaerobic digestion still exists although demand for wind turbines has significantly decreased in the last three to four years. The estimated generation per annum of renewable technologies has been derived by using the Capacity Factors outlined in Appendix 1 of the Authority's update to the 2008 Renewable Energy Assessment (January 2016).

Policy Area	Indicator 12c	Target	Performance
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Policy Area		Indicator 12c	Target	Performance
Renewable Energy Policy 33		Renewable Energy Supplementary Planning Guidance and Cumulative Impact of Wind Turbines on Landscape and Visual Amenity Supplementary Planning Guidance	All decision making is consistent with the Authority's Renewable Energy Supplementary Planning Guidance and Cumulative Impact of Wind Turbines on Landscape and Visual Amenity Supplementary Planning Guidance	
<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 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 2016 to March 2017) shows that the Renewable Energy Supplementary Planning Guidance was cited in four decisions, all of which were approved. These were for residential and commercial schemes which incorporated mainly solar technology within their designs. No decisions conflict with the Supplementary Planning Guidance.</p> <p>There were no significant applications for wind turbines received within this period and as such, the 'Cumulative Impact of Wind Turbines on Landscape and Visual Amenity' Supplementary Planning Guidance has not been cited.</p> <p><b>Conclusion:</b> The policy context and supplementary planning guidance continues to provide a positive framework for renewable energy generation. Development interest for solar panels, biomass and anaerobic digestion still exists although demand for wind turbines has significantly decreased in the last three to four years.</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 in Indicator 13.	

Policy Area		Indicator 13	Target	Performance
<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 as having potential for flooding have been screened by Natural Resources Wales (formerly by Environment Agency). No proposals have been permitted contrary to Policy 34 of the Plan. There have been two instances where proposals including the introduction or intensification of residential use have been sited in or partially in C2 flood Zones (Amroth and Saundersfoot). There has also been a further pre-application enquiry relating to a similar proposal at Amroth. In each case the Authority has expressed concern about the applications which would intensify residential or other vulnerable uses and be contrary to Policy 34 of the Local Development Plan and national planning policy as set out in Planning Policy Wales. On each occasion the approach has not been supported by Natural Resources Wales who have not raised any objections to the proposals. Authority Officers could usefully seek to clarify the advice being given by Natural Resources Wales.</p> <p><b>Conclusion:</b> The policy context set out in Technical Advice Note 15 and the Local Development Plan is being applied by Authority Officers but there appears to be a different approach being taken by Natural Resources Wales. Clarification needs to be sought.</p>				

Policy Area		Indicator 14	Target	Performance
Location of Growth	W	Percent of new development permitted on previously developed land.	33% of the housing land supply on previously developed land. 45% of the employment land on previously developed land.	Housing  Employment 
<p><b>Trigger:</b> Failure to achieve the targets of 33% and 45% by the formal plan review period.</p> <p><b>Reason:</b> A limited supply of development land means an assessment would be appropriate.</p>				
<p><b>Analysis:</b></p> <p><b>Housing:</b> 17.2% of residential units completed are on greenfield sites and 82.8% on brownfield sites when this target was considered at Plan Review. The Plan is well ahead of the target for residential development permitted. In the 2015/16 monitoring</p>				

Policy Area	Indicator 14	Target	Performance
<p>period 82.2% of housing completions were on brownfield sites and in 2016/17 85% were on brownfield sites, indicating a continuing positive trend.</p> <p><b>Employment related uses:</b> During 2016/17 the proportion of applications approved on greenfield sites was 23% and 77% on brown field. The target has been met.</p> <p><b>Conclusion:</b> No change is required in approach to achieve brownfield targets for housing or for employment related uses.</p>			

Policy Area	Indicator 15	Target	Performance
Policy 29 to 34	Effectiveness of Policies (Policy 29 to 34) & Supplementary Planning Guidance (Sustainable Design Guidance, Renewable Energy, Cumulative Impact of Wind Turbines on Landscape and Visual Amenity) 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 2016 to March 2017, three appeal decisions cited Local Development Plan policies within this group. All three decisions were dismissed and there was no question of the effectiveness of the policies by the Inspector.</p> <p>An Inspector did disagree with the Authority's consideration that the landscape and visual impact of an eco-dwelling would be unacceptable; however this is the result of a difference in planning judgement. The appeal was dismissed the appeal for failing to meet the requirements of other local and national planning policy.</p> <p><b>Conclusion:</b> No appeal decisions dispute the appropriateness of the policies for consideration in these decisions, nor their effectiveness. There is no evidence to suggest the policies and guidance in this grouping are not performing at appeals.</p>			

## 2D Visitor economy, employment and rural diversification

### Key outcomes



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

### Context

- 2.11 **Economy** – The Local Development Plan Review Report identifies that the target set out in the Local Development Plan to have 33% of the employment/mixed use allocations with planning permission by the end of the 2014/15 financial year has not been achieved. Reasons for sites not being developed include landowner decisions, non-viability and lack of public funding to develop sites. In updating the evidence base for the replacement Local Development Plan, it appears that the need is for ready-built premises for small and micro-businesses in the National Park, rather than for land allocations. This issue will be fully considered through the revision to the Plan which will also take into account updates to National Planning Policy.
- 2.12 **Chalet, Caravan and Camping Sites:** Against a backdrop of the National Park Authority's policy of restraint on new caravan, camping and chalet sites in the National Park there has been a significant increase in the number of unauthorised sites being reported. There continues to be a number of successful applications for certificates of lawful use for tent and caravan sites in the last few years which has increased the number of pitches available in this sector considerably. There is also a trend towards glamping and camping pods, although more traditional accommodation types appear to remain popular. The National Park Authority commissioned a study in 2015/16 to examine the capacity of the National Park landscape to accommodate more camping and caravanning sites. The study has concluded that there is very limited capacity within the landscape for further camping sites or extensions to existing sites. The outcome of the study and the changing demands of camping and caravanning and any changes required to the current policy will be fully considered through the revision of the Local Development Plan.
- 2.13 **Employment Land Review:** Pembrokeshire County Council included the National Park area in its annual Employment Land Review in 2016. The study concluded that just over 93% of available employment land in the National Park was in use, with a vacancy rate of slightly less than 5%. National Planning Policy recognises that market forces do not respect local authorities boundaries and the planning system should steer development to the most efficient and sustainable locations. Across Pembrokeshire the 2016 found there to be 217.83ha of vacant land and buildings with the majority of sites located within the Milford Haven Waterway area (Pembroke, Pembroke Dock and Milford Haven) and the majority of the rest, as would be expected and consistent with national planning policy, is focussed in and around the larger settlements in Pembrokeshire County Council's planning area such as Haverfordwest, Fishguard and Neyland. The majority of the land identified for the study was in B2 use (general industrial) which was dominated by the very



large South Hook LNG site. Further details are available in the Study Report<sup>9</sup>. Policy Performance


Policy Area	Indicator 16	Target	Performance
Policy 43	Loss of employment sites	0 approvals of loss of employment sites except where justified within the terms of the policy.	
<p><b>Trigger:</b> Loss of two or more employment sites or 500 sq. metres contrary to recommendation</p> <p><b>Reason:</b> Small employment sites can make an important contribution to sustainable communities.</p> <p><b>Analysis:</b> There have been no permissions granted resulting in the loss of employment sites which are contrary to Policy 43 of the Plan during this monitoring period.</p> <p><b>Conclusion:</b> Decisions made have been consistent with the policy.</p>			
Policy Area	Indicator 17	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 financial 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> There have been 3 Certificate of Lawful Development applications granted permission for camping and caravanning sites in the current monitoring period with over 100 pitches added to the supply. A further application was submitted for one of the sites to regularise the camping use. Had applications for these sites have been sought in the usual way, all would have been contrary to the policies of the Plan.</p> <p><b>Conclusion:</b> The Authority continues to face a challenging number of enforcement cases relating to unauthorised camping and caravanning sites and pitches. As well</p>			


<sup>9</sup> Pembrokeshire Employment Survey Report 2016 - <http://www.pembrokeshire.gov.uk/content.asp?nav=1626,109,141,1014&id=29613&language=>

as new sites becoming established without planning permission, there are also a high number of cases of authorised sites accommodating more pitches than the planning permission or licence permits.

Some operators have made a conscious decision to try to establish their sites before applying for planning permission as they are aware of the policy position which would not allow new sites to be established. The Authority is working with Pembrokeshire County Council and other Camping and Caravanning and tourism bodies to address the issue. The policy position is being fully considered through the revision of Local Development Plan. As part of that work the Authority has published the results of a study which assesses the landscape capacity of the National Park to accommodate more camping and caravanning sites.

**Conclusion:** The Authority needs to continue to address this issue comprehensively through liaison with Pembrokeshire County Council and other organisations and by continuing to monitor and carry out enforcement actions on unauthorised sites and pitches. The policy position is also being revisited through the replacement Local Development Plan.

Policy Area	Indicator 18	Target	Performance
Special Qualities Policy 8	Proposals for recreational activity contrary to Policy 8.	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 been consistent with policy.</p>			

Policy Area	Indicator 19	Target	Performance
Policy 35 to 43	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.	

**Analysis:** In the period April 2016 to March 2017 no appeal decisions cited policies or Supplementary Planning Guidance in this group.

**Conclusion:** No conclusion can be drawn as to the effectiveness of the policies or Supplementary Planning Guidance in this group at appeal.

## 2E Affordable housing and housing growth


### Key outcomes

- a) An estimated 1,600 new dwellings are provided of which a minimum of 530 new affordable homes are provided.<sup>10</sup>
- b) If by the end of the financial year 2014/15 the number of affordable homes built or under construction is below 80% of the proportion of the overall target for the Plan period which should be available by that date, the Authority will immediately commence a review of the Affordable Housing Strategy Policy.
- c) A higher density of development is achieved – a minimum of 30 dwellings to the hectare in the Local Development Plan's Centres<sup>11</sup>.

### Context

- 2.14 **Housing Market:** The nature of the housing market over the lifespan of the Local Development Plan is and will be the subject of much conjecture and conflicting forecasts. The link below provides detailed commentary on housing starts and completions in Wales recently.<sup>12</sup>
- 2.15 **Supplementary Planning Guidance Affordable Housing:** The guidance sets out the circumstances where it will be necessary to review the guidance through monitoring of key indicators (see section 6). This exercise was carried out in September 2017.
- 2.16 Considering the current evidence and trends a full review of the guidance is not be required at this time. There has been no single change in any one indicator meeting the threshold of 10% and no two indicators have changed by 5-9%.

### Policy Performance

Policy Area		Indicator 20	Target	Performance
Housing	W	The housing land supply taken from the current Housing Land Availability Study (TAN1)	Minimum 5 years supply.	
<b>Trigger:</b> Less than a 5 year supply in any one year.				

<sup>10</sup> In 2014 the National Park Authority adopted new supplementary planning guidance on affordable housing the application of which would reduce the ability of the Local Development Plan to achieve its targets for affordable housing provision.

<sup>11</sup> See Local Development Plan. Glossary of Terms

<sup>12</sup> <http://gov.wales/statistics-and-research/new-house-building/?lang=en>


**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 2017 Study shows a 1.2 year land supply. The Plan will end part-way through the Joint Housing Land Availability Study period (2021 Plan end date) and so the method of calculation takes this into account (as set out in Table 4 of Technical Advice Note 1).

There are a number of allocated sites which are the subject of well-advanced pre-application discussion, but re-allocation and deliverability of sites for housing development is matter being fully considered through the current Local Development Plan revision process (see also Appendix 2).

**Conclusion:** For Local Development Plan revision this will mean revisiting the overall housing land requirements and consequently the Plan's housing provision and acknowledging uncertainties in the housing market in setting annual targets – see Review Report and draft replacement Preferred Strategy Local Development Plan and supporting evidence.

Policy Area		Indicator 21	Target	Performance
Housing	W	The number of net additional affordable and general market dwellings built(TAN 2).	530 affordable dwellings over the Plan period.  1000 general market dwellings built. In total an annual completion rate of 90 per annum.	Actions are proposed to improve delivery  

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

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

Analysis:

**Overall Completions:** Overall completions for housing (market and affordable) since 2007 have totalled 581 (i.e. until April 2017), 64% of the overall target which was 90 per annum over 10 years (900).

There are however issues with site deliverability which has been recognised and are addressed in the Local Development Plan's Review Report.

**Affordable Housing:** The target of 530 affordable dwellings over the Plan period was based on contributions anticipated from housing land allocations and windfall sites as set out in the adopted Local Development Plan.

The adoption of supplementary planning guidance on affordable housing means that the target is not attainable taking account of the lowered affordable housing numbers achievable as a result of what was considered viable as at 2014. Affordable housing from allocations under the Adopted Local Development Plan as at September 2010 (including mixed use sites) was 517.<sup>13</sup>

With the application of percentage requirements which would be viable in the 2014 guidance the anticipated provision would be an estimated 309 affordable dwellings on allocated and mixed use sites. Of this an estimated 77 units are unlikely to come forward at all on sites in the Plan period given current information on site progression.<sup>14</sup>

In current circumstances (issues of site deliverability are being addressed through Local Development Plan review) a more meaningful figure for an interim affordable housing target to monitor is circa 250 for the Plan period (includes expectations from allocations that are expected to progress at least to some extent and a small windfall figure<sup>15</sup>). This will allow focus on emerging issues as opposed to those that are already being taken account through Local Development Plan revision.

Completions of affordable dwellings totalled 87 by the end of the financial year 2016 to 2017.

35% of the total end of Plan interim affordable housing target (2021) has been completed (87/250). 10 out of 15 years of the Plan have passed. The progress of the sites which are expected to come forward will continue to be monitored and emerging issues addressed through Local Development Plan revision.

On affordable housing contributions these are held and administered by Pembrokeshire County Council. The link below sets out the latest report to Cabinet on receipts and spending focussing on the last financial year.<sup>16</sup>

Projects include an exceptional land release for affordable housing in Marloes and the purchase of properties in Tenby and Jameston.

**Conclusion:** The Authority's Review Report for the Local Development Plan and the draft replacement Preferred Strategy identifies the emerging changes needed to the Local Development Plan. The monitoring of progress of sites will continue – see Appendix 2.





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<sup>13</sup> Table 6 Affordable Housing Provision

<sup>14</sup> Appendix 2 highlights those allocations that are not progressing.

<sup>15</sup> With the percentage requirements in all the submarket areas except 'Tenby area' (post code area SA70 7) and 'Newport area' (SA42 0) below 50% the ability of windfalls to contribute to the overall target will also be reduced.

<sup>16</sup> <http://mgenglish.pembrokeshire.gov.uk/ieListDocuments.aspx?MId=4043&x=1&LLL=0> Agenda item 11.

Policy Area		Indicator 22	Target	Performance
Allocation Sites Tables	W	Amount of development, including housing, permitted on allocated sites in the Development Plan as a % of Development Plan allocations and as % of total development permitted (ha and units).	Allocations – 100% permitted by the end of the Plan period on allocated sites.	Housing (22a) 
				Employment/Mixed use (22b) 
				Community Facilities (22c) 
				Road & Cycle Schemes (22d) 
	W	And as a percentage of total development permitted.	No target specified in the Plan.	See commentary below.
<p><b>Trigger:</b> Failure to achieve 33% of the first target by the formal Plan review period.</p> <p><b>Reason:</b> To allow land an opportunity to come forward means an assessment at this stage would be in appropriate.</p> <p><b>Analysis:</b> Allocations in the Plan are for:</p> <ul style="list-style-type: none"> <li>- Allocations with Housing (Table 1 Appendix 2 to this report)</li> <li>- Employment/Mixed Uses (includes live/work) (Table 2 of Appendix 2 this report)</li> <li>- Community Facilities (Table 3 of Appendix 2 of this report)</li> <li>- Road &amp; Cycle Schemes (Table 4 of Appendix 2 this report)</li> </ul>				

**Allocations with Housing (Table 1 Appendix 2):** The target was to have 33% of the land allocations with permission by the end of the financial year 2014/15. The target was not achieved. At the end of the financial year 2016-17 25% of the land allocated by area had been granted planning permission, accounting for 26% of the units allocated. The target has not been achieved.

The Authority's Review Report for the Local Development Plan identifies the changes needed alongside the replacement Local Development Preferred Strategy.

There is no target specified for the amount of residential units permitted on allocated sites as a percentage of all residential permitted since Plan adoption.

The number of dwellings permitted on non-allocated sites shows that in line with actions identified under Indicator 20 to improve land availability allocated sites provide for 51% of the units permitted and non-allocated sites for 49%.

**Employment/Mixed Uses – excludes mixed use listed in Table 1 Appendix 2 (Table 2):** The target was to have 33% of the land allocations with permission by the end of the financial year 2014/15 or at the end of the 2015-16 financial year. 3 sites are allocated and they are not progressing. Reasons include lack of interest by the landowner, lack of developer interest and issues around the viability of bringing employment sites forward where there is a lack of public funding.

773 applications were approved for employment related uses in the Plan period (as at end of April 2017) and these were not on allocated sites.


The Authority's Review Report for the Local Development Plan identifies the changes needed and a new approach is set out in the replacement Local Development Plan Preferred Strategy.

**Community Facilities (Table 3 Appendix 2):** The target is to have 33% of the land allocations with permission by the review period (end of the financial year 2014/15). Two allocations were made in the Plan for community facility provision. The target of 33% has not been met as none of the allocations have been fully implemented. The future of allocations will be reconsidered as part of the Local Development Plan revision. The improvements allowed through an allocation would be achievable under Policy 48 Community Facilities and Infrastructure Requirements.




**Road & Cycle Schemes (Table 4):** 7 Schemes are allocated. 4 schemes have been completed (RI2 and RI5, RI6 and RI7). Pembrokeshire County Council has advised that scheme RI4 (Fan Road junction with B4316) at Saundersfoot has not been progressed and should be removed from the Plan. Funding has been identified for a feasibility study for the New House Bridge improvements (scheme RI1) and further funding is being sought to undertake the work. There has been no progress to date on the proposals to improve the St Petrox bends (scheme RI3).

**Conclusion:** Please see Indicators 20 and 21 for recommendations regarding housing. A revision of the employment/mixed use allocations shown in Table 1 and 2 Appendix 2 is being undertaken as part of the work replacing the Local Development Plan. The allocations for community facilities will need to be revisited as part of the Local Development Plan revision. The Authority will discuss any revisions required to the list of schemes listed in Table 4 Road & Cycle Schemes Appendix 2 with the County Council as highway authority.

Policy Area		Indicator 23	Target	Performance
Policy 44	W	Average density of housing development permitted on allocated development plan sites.	30 per hectare target in the Plan Centres achieved.	
<p><b>Trigger:</b> 2 or more housing developments not achieving 30 dwellings to the hectare.</p> <p>Reason: To make the best use of available land.</p> <p><b>Analysis:</b> During this monitoring period planning permission was granted for part of 1 allocated site at St Ishmaels. The number of units granted was below the target of 30 per hectare which was due to the shape of the site. The lower figure on this set is more than off-set by many other sites granted permission for a greater number of units than allocated.</p> <p><b>Conclusion:</b> The target continues to be met.</p>				

Policy Area		Indicator 24	Target	Performance

Policy Area	Indicator 24	Target	Performance
Policy 44 to 47	Effectiveness of Policies (Policy 44 to 47) & Supplementary Planning Guidance (Affordable Housing, Low Impact Development making a Positive Contribution) when dealing with Applications and at Appeals	Inspector does not raise issues regarding the effectiveness of the policies or supporting supplementary planning guidance.	
<p><b>Analysis:</b> In the period April 2016 to March 2017 three appeal decisions cited Local Development Plan Policies in this group. One also cited the Low Impact Making a Positive Contribution Supplementary Planning Guidance and another also cited the Affordable Housing Supplementary Planning Guidance. All three appeals were dismissed.</p> <p>One decision related to an Enforcement Notice for a gypsy/traveller use caravan where there was no question of the effectiveness of Policy 46 Gypsy Sites.</p> <p>One decision was in relation to a residential development of 27 units on a mixed use allocation. The Inspector agreed with the Authority in that the proposal conflicted with Policy 45 Affordable Housing and the Affordable Housing Supplementary Planning Guidance although did note that the Supplementary Planning Guidance refers to re-appraisal of viability at development commencement stage only and not at reserved matters stage, which the Authority was also seeking. The Inspector however found no issue with the use of a mechanism for re-appraisal of financial viability for affordable housing provision in principle.</p> <p>One decision was in relation to a low impact development proposal. The Inspector disagreed with the Authority's consideration that the landscape and visual impact of the proposed eco dwelling would be unacceptable. However the appeal was dismissed for failing to meet the requirements of the local and national planning policy for low impact development on the grounds of failing to demonstrate adequate amounts of income and food to support the occupants, in addition to vehicular access concerns.</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 Authority can consider updating the Affordable Housing Supplementary Planning Guidance to add clarity in response to the Inspector's comments on the timing of viability re-appraisal. The Inspectors consideration of the landscape and visual impact of the low impact development proposals is the result of a difference in planning judgement rather than fundamental policy effectiveness.</p>			

## 2F Community Facilities, Retailing and Transport

### Key outcomes

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

### Context

2.17 **Retailing:** A report from the Local Data Company, based on a study of the top 500 Welsh town and city centres, states that the Welsh shopping centre vacancy rate in 2016 was 14.6%, which is a reduction of 4% since 2015. Out of all the centres, Milford Haven had the highest vacancy rate in the study. The latest study of National Park centres gives an average of 4.3% vacant units, this is a slight increase from 3.7% from 2016. The highest unit vacancy rate is currently in Solva at 7.7%. However this is the result of one vacant unit now being present out of a total of 14 surveyed.


2.18 Welsh Government has updated Planning Policy Wales Chapter 10 Retail (Edition 9) and Technical Advice Note 4: Retail Centre Development. These updates were published in November 2016. There has been no fundamental change in the ‘town centres first’ policy approach when locating retail development, however the updates recognise the need to identify appropriate responses to the changes seen in retail centres over recent years, for example where the vitality and vibrancy of centres is in decline. Additional clarity is provided for defining town centres and their hierarchy and primary and secondary frontages in Local Development Plans.

2.19 To inform Local Development Plan revision, the Authority, in partnership with Pembrokeshire and Ceredigion County Councils commissioned a study titled South West Wales Regional Retail Study, which was published in February 2017. The study reports on the existing levels of provision and patterns of convenience, comparison and bulky goods shopping in the region, identifies any likely additional future capacity requirements for each retail centre, and advises on the potential and effectiveness of a regional strategy and hierarchy for the three authority local planning areas. The study forms part of the Local Development Plan review evidence base.


2.20 **Community Infrastructure Levy:** There are no plans at present to pursue a Community Infrastructure Levy in Pembrokeshire.

2.21 A replacement Supplementary Planning Guidance has been adopted on Planning Obligations. This has been prepared jointly with Pembrokeshire County Council.


### Policy Performance

Policy Area	Indicator 25	Target	Performance
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> Community facilities are important to community sustainability.</p> <p><b>Analysis:</b> No applications determined between 1<sup>st</sup> April 2016 and 31<sup>th</sup> March 2017 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>
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Policy Area		Indicator 26	Target	Performance
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 have been no applications decided contrary to recommendation during the monitoring period. (2016 to 2017)</p> <p><b>Conclusion:</b> There are no issues arising as the trigger has not been met.</p>
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Policy Area		Indicator 27	Target	Performance
Policy16	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 there is excess provision in the area.</p>	

<p><b>Trigger:</b> 1 or more inappropriate developments granted permission contrary to</p>
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recommendation in any one year.

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

**Analysis:** Nineteen planning applications were approved which included the development of greenfield land during the monitoring period. This amounted to the development of 5.36ha of greenfield land.

Of the 19 applications:

- 1 was for a One Planet Development Proposal;
- 2 were for campsites, which were granted Certificates of Lawfulness;
- 4 were for agricultural workers or rural enterprise workers which met with national policy justification;
- 5 were for agricultural buildings;
- 1 was for a birds of prey attraction within an existing attraction grounds;
- 1 was a farm-diversification proposal for a new-build holiday-let;
- 3 were bases for mast structures and ancillary equipment;
- 1 was for the use of land identified as open space to be developed for visitor accommodation. The precedent was established by a previous application on this site.

**Conclusion:** All of the applications for development of greenfield sites met with the policies of the Local Development Plan and/or national planning policy. One application was granted permission on land which had been identified in the Local Development Plan as Open Space, as it had been used for that purpose prior to the adoption of the Plan. The land was subsequently purchased and not open to the public and had no value in amenity terms as it was not generally visible from public view points. The open space assessment also found there to be adequate recreational space within the village. The land was first granted planning permission for development in 2011.


Policy Area	Indicator 28	Target	Performance
	W Amount of greenfield and open space lost to development (ha) which is not allocated in the Plan.	Open Space lost - 0 % except where, with playing fields, facilities can be best retained and enhanced through the redevelopment of a small part of the site or alternative provision can be made of equivalent benefit or there is excess provision in the area.	N/A


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


**Reason:** The loss of open space unless justified leads to the undermining of the sustainability of local communities. This is also a Welsh Government indicator.

**Analysis:** This is a duplicate of Indicator 27. No analysis is done.


**Conclusion:** See Indicator 27.

Policy Area	Indicator 29	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 floor space 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 floor space is 4.5% at 2017. A breakdown of vacant floor space percentage by centre is as follows, Newport 3.7%, Saundersfoot 3.2%, St Davids 1.5%, Solva 7.9% and Tenby 5.8%.</p> <p><b>Conclusion:</b> No issues arise regarding vacancy rates in the National Park's retail centres. Slight increases in vacant floorspace since 2016 have occurred in Newport (by 3.7%), Solva (by 7.9%) and Tenby (by 1.7%), Saundersfoot has decreased slightly (by 0.7%) and St Davids has remained the same. Overall the vacancy percentage has increased from 3% to 4.5% since last year. For unit numbers, the average vacancy rate for the National Park is 4.3% (an increase of 0.6% from 2016): this is significantly below the national average for town centres at 14.6% (see paragraph 2.14 above).</p>			

Policy Area	Indicator 30	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 (2016-2017).</p> <p><b>Conclusion:</b> There are no issues arising.</p>			

Policy Area	Indicator 31	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> There were no applications raising significant traffic impact concerns approved during the 2016/17 monitoring period.</p> <p><b>Conclusion:</b> There are no issues arising as the target has been met.</p>			

Policy Area	Indicator 32	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).	N/A
<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> A two hectare Civic Amenity Site has been developed and is now operational outside of the National Park on Devonshire Drive, Crane Cross. This site has replaced the former Salterns Civic Amenity Site in Tenby (see Chapter 2B of the 2015 Annual Monitoring Report).</p> <p><b>Conclusion:</b> Due to the changes in national policy, there is no longer a need to monitor the provision of waste management capacity based on land take (see paragraphs 2.13 – 2.19 of the 2014 Annual Monitoring Report). Updates are required to Local Development Plan Policies 27 'Local Waste Management Facilities' and 28 'Composting' to reflect the new national policy context. A new indicator to monitor the performance of these updated policies will be included as part of the formal Local Development Plan review.</p>			

Policy Area	Indicator 33	Target	Performance
Policy 48 to 56	Effectiveness of Policies (Policy 48 to 56) & Supplementary Planning Guidance (Planning Obligations) when dealing with Appeals	No issues arise from any appeal decisions regarding the effectiveness of the Plan's policies.	

**Analysis:** In the period April 2016 to March 2017 two Inspectorate appeal decisions cited policies in this group, none cited relevant supplementary planning guidance.

One decision cited Policy 50 Town and District shopping Centres in relation to a change of use from A1 to A3 within the Tenby Primary Frontage. The Inspector agreed with the Authority on the impact upon the vitality and viability of the town centre and dismissed the appeal.

The other decision cited Policy 53 Impacts of Traffic in relation to a dismissed appeal for a low impact development partly on the grounds of there being uncertainty over the suitability of the vehicular access to the site.

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



### 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 median trend for employment rates in agriculture, forestry and fishing in Pembrokeshire between 2001 and 2010 was an increase in rates. However, more recent data (2011-2015) may indicate that employment rates in these industries are beginning to decline.</p> <p>The 2016 State of Wildlife in Pembrokeshire report provides an update on the 2011 report and an assessment on the progress in the 5 years between the reports. The report suggests that biodiversity associated with agriculture such as farmland birds, heathland and arable field margins are in decline. However, the report also highlights that those habitats and species where considerable effort has been made are stable or are improving. It is also noted that oak woodlands are improving, which may be due to improved forestry practices.</p> <p>Within the National Park specifically 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 adding value.</p>
2	<p><b>Locate developments so as to minimise the demand for travel, especially by private car.</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. During this monitoring period 1 proposal was approved contrary to Policy 7 of the Local Development Plan. In isolation this will have a limited effect on the Sustainability Appraisal Objective. However, the Plan needs to guard against a proliferation of residential uses in countryside locations as this will lead to an increase in car use and associated impacts.</p> <p>Achievement of this sustainability objective will depend largely on activity outside the Local Development Plan. Commentary for sustainability appraisal objective 13 also indicates that generally, within the scope of the Local Development Plan, community facilities are being retained and enhanced.</p> <p>Please also see the commentary for sustainability objective 4 and</p>

Objective Number	Sustainability Objective
	policy 52 (indicator 31).
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. An update to this data is planned for 2018/19.</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 guidance helps to address seaward development impacts by dividing the National Park into 12 character areas and identifying their sensitivities.</p> <p>In December 2013 Supplementary Planning Guidance on the Cumulative Impact of Wind Turbines was adopted, which aims to address the issue of multiple wind turbine proposals and associated landscape impacts. This should help to reduce the landscape impacts of wind turbine developments. However, no applications for wind turbines were received during this monitoring period.</p> <p>Partnership work with Pembrokeshire County Council and Carmarthenshire County Council has continued during this monitoring period to record renewable energy developments. This work has now resulted in comprehensive GIS data sets detailing the scale and location of wind turbine and large scale ground mounted photovoltaic developments. These datasets are available to the public for review and to Officers and applicants to assist in assessing the cumulative landscape impacts.</p> <p>As part of the background work to the first review of the Local Development Plan a Caravan and Chalet Landscape Capacity Study was carried out by White Consultants in 2015. This commission explored the potential for further caravan and camping development within the National Park.</p> <p>The Authority put forward 6 sites throughout the National Park as candidates for “Dark Sky Discovery Sites”, 4 of these were accepted. A further 3 sites were proposed by the National Trust; all of these were also accepted.</p> <p>Long term concerns about changes in landscape quality are part of the rationale of this objective. Application of the Local Development Plan policies and projects outside the planning process suggest positive progress towards this objective.</p>

Objective Number	Sustainability Objective
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. 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 or changes to the school holidays. However, the Local Development Plan may assist by supporting improvements which create accommodation suited to year round use, whilst not adding substantively to the overall provision.</p> <p>Approvals for self-catering accommodation since adoption of the Plan may 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 7 applications for the construction of new self-catering units or the conversion of existing buildings to self-catering units were granted. This is consistent with the objective of not adding substantively to overall provision.</p> <p>A review of the Authority's approach to camping, caravanning and chalet policies referred to in Chapter 2D will form part of the Local Development Plan revision.</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 permission to create new infrastructure in areas predicted to be affected by sea level rise of up to two metres were granted during this monitoring period.</p> <p>There has been three instances (two applications, one pre-application) during this monitoring period where proposals have been made that would introduce new or intensify existing residential uses within a C2 flood zone. In all instances Natural Resources Wales have raised no objections. Authority Officers are seeking clarification with Natural Resources Wales (see indicator 13).</p>

Objective Number	Sustainability Objective
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.</p> <p>Local authority estimates by the Department for Energy and Climate Change for Pembrokeshire (2005 – 2014) (released 30/06/2016) indicate that the per capita rates of carbon dioxide from domestic sources have remained consistent between 2005 and 2014.</p> <p>Carbon dioxide from industrial and commercial sources has decreased by approximately 20% between 2013 and 2014, having remained fairly consistent between 2005 and 2013.</p> <p>At present the Local Development Plan is exceeding its target for electricity generation from renewable sources brought forward by planning proposals, with an increase of 0.179 Gwh over the last monitoring period. This has been due largely to proposals for photovoltaics and a single proposal for a microscale wind turbine (see indicator 12a).</p> <p>The Local Development Plan is still falling short of its target for renewable heat generation. A small increase from 4.06 to Gwh to 4.235 Gwh was recorded during this monitoring period. The reasons that the Plan is falling short of this target are outlined under indicator 12b.</p> <p>Please also see the commentary in Chapter 2C as the overall targets will require revision to take account of an extended Local Development Plan period in the replacement Local Development Plan.</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 fallen short of the target set out in the Local Development Plan (See the analysis and conclusions under indicator 21 for details).</p> <p>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 while the policy is being examined in detail when preparing the replacement Local Development Plan.</p> <p>Indicators 20, 21 and 22 provide a detailed commentary on progress with the various allocations in the Local Development Plan and where areas require revision. Permissions granted that are not on allocated sites can in general be regarded as positively contributing to sustaining local communities.</p> <p>In conclusion the Local Development Plan is contributing positively to the local economy throughout the Park by providing a positive policy framework for the approval of schemes. Poor performance on delivery</p>

Objective Number	Sustainability Objective
	on allocated sites will be addressed through Local Development Plan revision.
9	<p><b>Encourage access for all to the National Park, reflecting the social mix of society.</b></p> <p>Meeting this objective is likely to be the result of efforts outside the application of the Local Development Plan. Policy 39 may lead to the conversion of cheaper forms of accommodation to more expensive forms, which would not help in meeting this objective. During the monitoring period 7 applications for upgrades to caravan and camping sites were approved.</p> <p>Policy 45 encourages the delivery of affordable housing. Indicators 20 to 22 provide a commentary on progress made and the Local Development Plan Review Report identifies the changes needed alongside the replacement Local Development Plan Preferred Strategy.</p>
10	<p><b>Maintain the cultural distinctiveness of communities.</b></p> <p><b>This sustainability objective covers the breadth of aspects that contribute to the unique character and cultural distinctiveness of the National Park.</b></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 Sustainability Appraisal Objective 8). 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% (5.8%) are identified as being at any degree of risk. There is potential for the uses of listed buildings to change – 3 listed building consents for change of use were granted between April 1st 2016 and March 31st 2017.</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.</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. The Authority is currently undertaking a Habitats Regulations Assessment due to the hydrogeological interrelationship between the quarry and Carew mill pond.</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</p>

Objective Number	Sustainability Objective
	<p>confirmation.</p> <p>The Authority has conducted a periodic review of Syke Quarry's mineral planning conditions (ROMP), which occurs every 15 years for 'mining sites', to update conditions to modern standards.</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 64.9% in 2015/16, a small reduction on 2014/15 (65.4%), this reduction is attributed to household waste, the rate of household waste. The quantity of household waste composted has increased on the 2014/15 figure.</p> <p>The number of fly-tipping incidences reported has increased in Pembrokeshire between 2014/15 (818) and 2015/16 (1,199). Past trends are similar with peaks and troughs year on year but with smaller variation. Figures for 2013/14 and 2015/16 are showing significantly greater numbers of reports with 1,163 and 1,199 respectively.</p>
13	<p><b>Community facilities (including health &amp; social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population.</b></p> <p>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 2016 – 2017 monitoring period no applications were approved that would result in the loss of a community facility (Policy 48), and two applications were approved for the improvement of existing community facilities.</p>
14	<p><b>Maintain and enhance biodiversity both within and outside designated sites</b></p> <p>The "State of Wildlife in Pembrokeshire" (2016) suggests that biodiversity associated with agriculture is in decline, and has declined further between the 2011 and 2016 reports (see comments under Objective 1).</p> <p>During the 2016-17 monitoring period the Authority's Direction and Delivery teams carried out conservation land management activities on over 100 sites across the National Park, with one or two sites outside of the National Park where opportunities to improve connectivity arise. Results from this conservation monitoring period indicate that all of the sites under active conservation management are improving or are in excellent condition. Many of these sites help to maintain and enhance the biodiversity of designated sites by providing buffering and improving connectivity. This strategic approach has wide spread benefits for biodiversity both within and outside of the National Park.</p> <p>In addition there are specific projects carried out by the Direction Team</p>

Objective Number	Sustainability Objective
	<p>such as the Stitch in Time project, which is a strategic approach to the control of invasive non-native species in the Gwaun Valley.</p> <p>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 2016 and March 31st 2017 no developments have received planning approval contrary to this policy. Additionally, during the monitoring period, 59 planning applications have been approved that included measures to promote biodiversity gain.</p> <p>It is considered that the Local Development Plan is making positive contributions to this sustainability objective.</p>
15	<p><b>Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.</b></p> <p>Dŵr Cymru/Welsh Water (January 2015) has indicated that in general, they should be able to provide water to any new housing coming forward under the Local Development Plan. However, there are known issues for sewerage and waste water treatment capacity in many of the settlements within or partly within the National Park.</p> <p>During this monitoring period 12 beaches in the National Park were awarded blue flags, with a further 14 being awarded green coast awards (covering more remote, rural beaches).</p> <p>The most recent Water Framework Directive data (2015) for overall classification indicates that 50% of the coastal waters in Pembrokeshire are achieving "Good" classification<sup>17</sup>; the remaining 50% are achieving "Moderate". Estuaries are of 60% and 40% "Moderate" and good overall status respectively. These two types of water body are, proportionately, more within the National Park than in the rest of the County.</p> <p>2015 Water Framework Directive data, which includes the assessment, for rivers is available to download from Natural Resources Wales in GIS format (ESRI Geodatabase<sup>18</sup>), this allows for more specific figures</p>

<sup>17</sup> The Water Framework Directive classification is risk-based and focuses where there is likely to be a problem. It uses a principle of 'one out, all out' which means that the poorest individual result drives the overall classification. It reports on over 30 measures, grouped into ecological status and chemical status. The overall classification status for surface waters is assessed by combining the ecological status with the chemical status. If the chemical status of the water body is Good, or the water body does not require chemical assessment, then the overall status is the same as the ecological status. If the chemical status is Failing to Achieve Good then the water body cannot achieve Good or High overall status. The overall status of a water body that has ecological status Good or High but is failing to achieve Good chemical status is Moderate. Otherwise, the overall status is the same as the ecological status (Natural Resources Wales 2016).

<sup>18</sup> Natural Resources Wales Water Framework Directive (WFD) River Waterbodies Cycle 2 Data

<b>Objective Number</b>	<b>Sustainability Objective</b>
	to be derived for the National Park. This data indicates that 59% of the river waters in the National Park are achieving “Good” classification, 34% “Moderate” classification and 7% “Poor”.

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available from <http://bit.ly/2stLPoZ>



## Appendix 1 Supplementary Planning Guidance (as at July 2017)

	<b>Title</b>	<b>Current Status</b>
1.	Accessibility	Adopted June 2013
2.	Affordable Housing (Replacement Guidance)	Adopted November 2014.
3.	Archaeology	Adopted June 2011
4.	Coal Works – Instability	Adopted June 2011- Technical update May 2014
5.	Conservation Area Proposals <sup>19</sup>	October 2011
6.	Landscape	Adopted June 2011
7.	Loss of Hotels	Adopted June 2011
8.	Low Impact Development	Adopted June 2013
9.	Parking	Adopted June 2011
10.	Planning Obligations (Replacement Guidance)	Adopted September 2016
11.	Recreation	Adopted December 2012
12.	Regionally Important Geodiversity Sites	Adopted October 2011 Addendum adopted 28 <sup>th</sup> September 2016
13.	Renewable Energy Addendum to the Renewable Energy on Field Arrays <sup>20</sup>	Adopted October 2011 Adopted June 2012 Technical update April 2014
14.	Safeguarding Mineral Zones	Adopted June 2011 Technical update June 2014
15.	Seascape Character	Adopted December 2013
16.	Shopfront Design	Adopted October 2011
17.	Siting and Design of Farm Buildings	Adopted June 2012
18.	Sustainable Design	Adopted June 2011 (updated December 2013)

<sup>19</sup> Angle, Caerfarchell, Caldey Island, Little Haven, Manorbier, Newport and Newport Parrog, Portclew, Porthgain, Saundersfoot, Solva, St Davids Trefin, Tenby.

<sup>20</sup> Now incorporated in the Renewable Energy Supplementary Planning Guidance

	<b>Title</b>	<b>Current Status</b>
19.	The Cumulative Impact of Wind Turbines	Adopted December 2013
20.	Enabling Sustainable Development in Welsh National Parks	Adopted March 2015
21.	WITHDRAWN - Building Extensions	Adopted June 2011
22.	WITHDRAWN - Validation + Interim Statement (October 2011)	October 2009
23.	To do - Biodiversity Supplementary Planning Guidance	To do – dependent on resources.
24.	To do – Lighting Supplementary Planning Guidance	To do – dependent on resources.

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

## Appendix 2 Site Specific Monitoring

### Key to Table 1

Planning permission granted as at April 2017 <sup>21</sup> or site completed	
Landowner or developer actively investigating bringing the site forward for development under the Local Development Plan adopted September 2010.	
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>	
Being assessed as a Candidate Site for the replacement Local Development Plan	CS (ref)  See website for further details <sup>22</sup>

**Table 1 Allocations that include housing**

<b>Location Proposals Map ID</b>	<b>Site Name and Location</b>	
Broad Haven HA734	South of Driftwood Close	CS 006
Broad Haven MA776	Land north east of Marine Road	CS 041
Crymych HA750	Depot Site	
Dale HA382	Castle Way	CS 087
Dinas Cross HA387	Opposite Bay View Terrace	CS 137
Herbrandston HA732	East of Herbrandston Hall	CS 149
Jameston HA436	North of Landway Farm	
Jameston HA730	Opposite Bush Terrace	CS 022
Jameston HA821	Green Grove	CS 033
Lawrenny HA559	Adj Home Farm	CS 045
Manorbier Station HA848	Field opp Manorbier VC	CS 029

<sup>21</sup> Includes having a resolution to grant planning permission for housing subject to the signing of a S106 agreement.

<sup>22</sup>

<http://www.pembrokeshirecoast.org.uk/Files/files/Dev%20Plans/LDP2/Candidate%20Sites/Candidate%20Site%20Register.pdf>

<b>Location Proposals Map ID</b>	<b>Site Name and Location</b>	
	School	
Manorbier Station MA895	Land part of Buttylands	CS 138
New Hedges HA813	Rear of Cross Park	CS 145
Newport HA825	North of Feidr Eglwys	CS 141
Saundersfoot MA777	Rear of Cambrian Hotel, Saundersfoot	
Solva HA384	Adj Bro Dawel	CS111
Solva HA792	Bank House, Whitchurch Lane	CS102
St Davids HA385	North of Twr-y-Felin	
St Davids HA737	West of Glasfryn Rd	CS 099
St Davids HA789	Adj Ysgol Bro Dewi, Nun Street	CS 097
St Ishmaels MA733	Adj School	CS 034/055
Tenby HA377	Brynhir	CS 112
Tenby HA723	former Cottage Hospital Site	
Tenby HA724	Rectory Car Park	CS 146
Tenby HA727	West of Narberth Road	CS 056
Tenby HA752	Butts Field Car park, Tenby	CS 113
Tenby HA760	Reservoir Site, Tenby	CS 147
Tenby MA706	Upper Park Road, Tenby	
Tenby MA707	White Lion St/Deer Park, Tenby	
Tenby MA710	Sergeants Lane, Tenby	CS 148
Trefin HA738	North of Heol Crwys	CS 150

### Key to Tables 2, 3 and 4

Planning permission granted/site completed	
Landowner or developer actively investigating bringing the site forward for development under the Local Development Plan adopted September 2010.	
Allocation not progressing	
Being assessed as a Candidate Site for the replacement Local Development Plan	CS (ref) See website for further details <sup>23</sup>

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

<sup>23</sup> <http://www.pembrokeshirecoast.org.uk/Files/files/Dev%20Plans/LDP2/Candidate%20Sites/Candidate%20Site%20Register.pdf>

<b>Location/ Proposals Map ID</b>	<b>Site Name</b>	<b>Proposed Use</b>	<b>Monitoring</b>
Newport MA232	Land adjacent to the Business Park, Feidr Pen y Bont	Mixed (Live/Work Units)	Not implemented. Planning permission granted in May 2009 for a new factory unit on proportion of this land has now lapsed. Landowner has no short-term proposals for the site.CS 060/ 082/ 083
EA748	South of St Davids Assemblies	Employment B1, B8, Local Waste Management Facility	Not implemented. Landowner has advised that this site will not be developed. This will be addressed through the replacement Local Development Plan.CS 003
MA746	Between Glasfryn Road and Millard Park, St Davids	Mixed (Live/Work Units)	Not implemented.CS 004

**Table 3 Community Facilities**

<b>Site Ref</b>	<b>Site Name &amp; Location</b>	<b>Use</b>	<b>Monitoring</b>
CP829	Land at Saundersfoot Railway Station, Pentlepoir	Car Park	The landowner has submitted the land as a Candidate Site for a mixed use proposal – ref CS 025
CP828	Manorbier Station	Car Park	Application NP/13/82 granted for 5 parking spaces; 1 disabled space, cycle parking and directional signs. This was incorrectly reported in the 2015 Annual Monitoring Report as having been implemented. Work commenced but higher

<b>Site Ref</b>	<b>Site Name &amp; Location</b>	<b>Use</b>	<b>Monitoring</b>
			than expected cost estimates to fulfil Network Rail requirements and insufficient grant funding resulted in Pembrokeshire County Council being unable to progress the works further.

**Table 4 Road & Cycle Schemes**

<b>Scheme Number</b>	<b>Road/Cycle Schemes</b>	<b>Monitoring</b>
RI1	New House Bridge Improvement A4075	Funding has been identified to complete a feasibility study. This is a possible contender for Local Transport Fund bid 2016/17 with match funding from Bluestone Section 106 funding.
RI2	Shared Use Path south of Carew Castle	Completed.
RI3	St Petrox Bends Improvement	A scaled back and localised version of the original aspiration is now being considered by Pembrokeshire County Council.

RI4	Fan Road/B4316 Junction Improvement, Saundersfoot	Not implemented. Pembrokeshire County Council has advised the scheme should be removed from the Plan. This will be addressed in the replacement Local Development Plan.
RI5	Gumfreston to Tenby Phase 3	Completed.
RI6	Glasfryn Lane, St Davids	Completed.
RI7	A40 Canaston Bridge	Completed.