

**REPORT OF THE HEAD OF PARK DIRECTION**

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**SUBJECT: 2013 ANNUAL MONITORING REPORT ON THE PEMBROKESHIRE COAST NATIONAL PARK LOCAL DEVELOPMENT PLAN**

Purpose of Report

The Annual Monitoring Report is a document which is produced by the Authority each October, looking back at the previous financial year, from 1 April to 31 March.

The Report should assess the extent to which the Local Development Plan strategy and policies are being achieved.

The Report measures various indicators to assess the performance of the individual planning policies set out in the adopted development plan but also to provide a general portrait of the social, economic and environmental conditions in the Park.

'Key Findings' can be found at the beginning of the document which sets out where issues have arisen and what further action is required.

The 2012 report was made available for comment until the 1<sup>st</sup> of June 2013. The comments received are responded to in Appendix A. Officers have reviewed the comments and used them to inform the drafting of the 2013 Annual Monitoring Report. The 2013 Monitoring Report can be found in Appendix B.

Recommendation

- 1. That the Officer response to comments received on the 2012 Annual Monitoring Report be agreed – Appendix A.**
- 2. That the attached Annual Monitoring Report for the Local Development Plan be approved for submission to the Welsh Government by the 31<sup>st</sup> October 2013 – Appendix B.**

Background Documents

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

*Local Development Plan Manual by Welsh Government*

*Local Development Plan Wales: Policy on Preparation of LDPs*

*Welsh Statutory Instrument 2005 No. 2839 The Town & Country Planning (Local Development Plan) (Wales) Regulations 2005*

*Local Development Plan Monitoring Report 2011*

*(For further information, please contact Martina Dunne on ext 4820)*

## Appendix A: Report of Consultation on the Local Development Plan 2012 Annual Monitoring Report

Ref	Comment	Officer Response
AMR/2012/001 Newport Area Environment Group	<p>Policy 3 Newport Local Centre (Tier 3) Strategy Policy The only reference to Policy 3 in this Monitoring Report is by inference as follows:-</p> <p>Planning Improvement Fund 2012-13 Requirements</p> <p>1.6. Highlighted is the requirement to identify policies that are not being implemented and for each such policy, identify:</p> <ul style="list-style-type: none"> <li>• Reasons why the policy is not being implemented</li> <li>• Steps that can be taken to enable the policy to be implemented</li> <li>• Whether a revision to the plan is required</li> </ul> <p>1.7. In terms of issues of implementation there are 56 policies in the Plan. 36 have been referred to during the monitoring period in planning applications considered. 20 have not been engaged.</p> <p>These include some strategy policies which cross refer to more detailed policies of the Plan that have been applied. Some are in place to deal with specific issues such as minerals and waste and would not be used regularly in any case. Monitoring of usage until the review period will provide a better time frame for considering the need for policies. (Page 4)</p> <p>Thus, apart from information to be gleaned from references to the said more detailed policies, there is no overall assessment of the effects of Policy 3, the strategy for Newport, against those which were anticipated”</p> <p>NAEG is concerned for the sustainable development of the community of Newport, questions the appropriateness of Policy 3 and urges PCNPA to revisit this together with the background information from which this policy was developed prior to 2010 and to consider what updates should be made in view of the changes that need to be made to this data since.</p>	<p>Policy 3 is a strategic policy which sets out the overall and long-term approach for Newport throughout the Plan period. Proposals coming forward should be consistent with this strategy and comply with all relevant parts of the Local Development Plan and National Planning Policy.</p> <p>Please see further responses on individual elements of policy performance. Performance of the strategic policy needs to be monitored over a longer period and this will be considered through the scheduled review of the Plan.</p>
AMR/2012/002 Newport Area Environment Group	<p>The figure in Policy 3 given as the estimated number of Newport residents is understood to be for the population within the “development boundary” only.</p> <p>During the development process of the LDP, NAEG argued that the greater size of population served by Newport as a “<i>Local Centre</i>” should be taken into account in</p>	<p>In each respect Newport is not different to any other settlement or area of the Park. The influx of visitors sometimes causes specific issues requiring attention from infrastructure providers; at other times they bring benefits of boosting user numbers to help keep services viable. The</p>

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	<p>developing PCNPA strategy.</p> <p>Further, and of even greater significance, the population of Newport town and the surrounding area very greatly increases in summer months but there is no estimate of by how much and in what ways this fact should impact on strategy and service provision.</p>	<p>majority of controls are outside the influence of land-use planning.</p> <p>However for those issues which are within the land-use planning remit, infrastructure providers are consulted during preparation of the Plan and on applications and proposals coming forward to ensure there is sufficient capacity/scope.</p>
<p>AMR/2012/003 Newport Area Environment Group</p>	<p>County Council population estimates (2010) showed that Newport ward had the highest percentage of people over 50 yrs old in Pembrokeshire at the time of the LDP's adoption. Over 65s made up over 34% of people living here. Nearly 20% were shown to be 75+ years old. (This is predicted to increase exponentially within a few years). The text attached to Policy 3 mentions only "an aging population" as being "of concern" By contrast, the proportion of the Newport population aged between 19 and 29 at that time was given as 6.0%, about which no mention is made in the LDP.</p> <p>It is imperative that this demographic imbalance is addressed wherever possible at this point in time because, for instance, the Local Health Board strategy policy shift of services towards "Care in the Community" means that a higher proportion of young people will be needed to provide services locally, whether private, public or voluntary.</p>	<p>Agreed. However, the Local Development Plan is concerned with spatial planning, which limits its influence over aspects of society beyond, for example, ensuring that community facilities are built or existing community facilities are protected in a planning context. Where there is a need for affordable housing Policy 45 can provide for this.</p> <p>The issues and suggestions that you have presented are all valid and of imminent concern but can only be predominantly addressed through plans and initiatives outside of the Local Development Plan.</p>
<p>AMR/2012/004 Newport Area Environment Group</p>	<p>2011 Census results can be read as indicating that close to 40% of all households in Newport ward are second homes. Policy 3 is based on a figure quoted of only 24% of dwellings (within the development boundary)</p>	<p>Policy 3 is not directly concerned with the provision of holiday homes; rather it aims to maintain community facilities. With regard to holiday homes in this policy context, a planning application would be identified as in conflict with the policy if a community facility were subject to change of use to a holiday home or dwelling. One such application has been received within the last financial year and was subsequently refused on the basis that it was not compatible with LDP Policy 3.</p> <p>The figure of 24% was provided as context when describing the issues for Newport as a local centre and not as the basis for the policy.</p>
<p>AMR/2012/005 Newport Area Environment Group</p>	<p>The LDP stipulates that 70% of the housing on Newport's one housing allocation should be "affordable" This proportion should now be retained especially in view of the fact of the small proportion of young people living here and that the number of second homes here is very much higher than previously</p>	<p>Support for 70% affordable housing provision is noted. The Authority has set out this Policy context. Affordable housing provision is to meet need and as you suggest the nature of that need is changing. The provision of housing has to come from others</p>

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	<p>stated.</p> <p>A high proportion of households in Newport ward are occupied by pensioners living alone. Some older people live in family homes which are bigger than they now require. At the same time, very regrettably, many people have to leave Newport towards the end of their lives to downsize to or to find suitably designed housing or nursing home accommodation.</p> <p>Policy 3 states that “<i>the land use priorities will be...a) to meet the housing, in particular affordable housing needs of the local area</i>” NAEG urges PCNPA to realise that the housing needs here also include housing suitable for older people.</p> <p>Newport needs “<i>lifetime housing</i>” within easy walking distance of the town centre to enable more people to stay here, which could potentially release their former homes hopefully for younger families to fully occupy. Newport and District Community Forum has lobbied the office of The Older People’s Commissioner for Wales in an attempt to affect the Housing Bill so as to change the way Wales plans for housing and neighbourhoods in future, by keeping older people in mind.</p>	<p>such as the County Council, Housing Associations or private developers. Identified need for social housing is taken from the common housing register. Where this includes specially adapted housing for elderly or infirm people, it will be taken into account through the provision of affordable housing in the town.</p> <p>The Authority will also seek to maximise affordable housing provision to meet identified needs.</p>
AMR/2012/006 Newport Area Environment Group	<p>PCC Pembrokeshire Area Profiles 2011 identify Newport (and St Dogmaels) as the most deprived areas in N E Pembrokeshire in terms of Employment.</p> <p>This was the assessment before the loss of Eco Centre Wales from the town in 2013. Eco Centre Wales is mentioned twice in the text to Policy 3, as follows – at 4.27 “<i>Newport’s Eco Centre (sic) is well regarded in its role in sustainable living</i>” and at 4.29, under “<b><i>Newport by 2021</i></b>”, “<i>The opportunities to link new employment to adding value to Newport’s reputation as an Eco Centre and local produce has materialised</i>”</p> <p>NAEG asks what vision PCNPA now has for “<i>new employment</i>” in this geographical area and how the LDP will support this? NAEG also questions what “<i>local produce</i>” PCNPA exactly had in mind in making this statement, and how Policy 3 supports an increase.</p>	<p>Clarification has been sought from Pembrokeshire County Council on the extract from the Pembrokeshire Area Profiles. Whilst Newport is described as one of the most deprived areas, this is relative only within the immediate area. Fortunately, within a wider context, compared with the rest of the County and country, Newport is not a deprived area.</p> <p>Loss of the Eco Centre is very regrettable. The references to the Eco Centre are contained in the LDP and not the AMR. The LDP can be updated at review stage to reflect the closure. Economic development and inward investment in Pembrokeshire is a function of the County Council. The National Park Authority can assist by allocating land for development and protecting existing employment land from loss to other uses, unless there is evidence to suggest it is no longer necessary. Thus through policy 43 of the LDP, the National Park Authority seeks to protect employment sites, such as</p>

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		<p>the former Eco Centre for further employment uses. In instances where further employment uses are not forthcoming, priority is given to other community uses or affordable housing.</p> <p>The statement regarding 'local produce' was included as a result of the pre-deposit consultations which included work undertaken by Planed in producing Community Plans. An updated version of the Newport Community Plan and available on the Planed website (Newport Hub Area Development Plan, 2010) continues to make reference to work with the Newport Area Environment Group to organise street markets, sell local produce, products and services.</p>
<p>AMR/2012/007 Newport Area Environment Group</p>	<p>Provided over 20 years ago through Welsh Development Agency (WDA) funding aimed at improving the quality of life in the Newport area and which the Carningli Rural Initiative (CRI) Management Committee elected to be used to develop a site for business units, Pen Y Bont Business Park was purchased by PCC and has accommodated 2 workshop units, with the rest of the site remaining unused (apart from construction of the private dental surgery). This Park was an employment allocation site in the Joint Unitary Development Plan</p> <p>Planning permission was granted in 2009 for an ice cream manufacturing business and included a reserve placed on the whole of the rest of the Business Park area. All the remaining land at the Business Park was purchased from PCC by this company, without conditions imposed for return into public ownership should the company not proceed with the development (as has happened to date).</p> <p>LDP Policy 3 now states that "<i>the land use priorities will be (both)... b) to provide for employment development to meet the needs of the local area ...c) to provide an opportunity to develop work/live units ...to meet the needs of the local area.</i>"</p> <p>At the Deposit stage in the LDP process, NAEG objected that land that was wrongly being referred to (and still is referred to) as an "<i>extension</i>" to the existing Business Park, when this was an established part of the</p>	<p>Policy 42 of the Local Development Plan sets out how employment opportunities will be provided and safeguarded. Employment development is not limited to sites within the Centre boundary and the Authority will consider such windfall applications in line with the Plan and National Planning Policy which allows for a range of opportunities, providing they do not harm the National Park or its Special Qualities.</p>

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	<p>employment allocation in the JUDP, should be allocated to “live/work units”, without also identifying a separate replacement allocation for business units, but the objection was unheeded. At the same time, despite being fully aware of the permission granted in 2009, PCNPA proceeded to allocate the Pen Y Bont land to “live/work units” without seeking an alternative allocation site for B1, B2 and B8 employment purposes.</p> <p>As the Business Park is now “off the radar” of PCC Economic Development, as it is now in private hands, is it any wonder that the six “live/work units” have not materialized? And how did PCNPA envisage “to provide for employment development to meet the needs of the local area” when no allocation of land exists for this purpose?</p> <p>NAEG would like to know what PCNPA and PCC between them plan to do about this sorry situation.</p>	
<p>AMR/2012/008 Newport Area Environment Group</p>	<p>Revision of Planning Policy Wales, Chapter 7, <u>Supporting the Economy</u> is of relevance here</p> <p><i>“Local planning authorities are required to adopt a more holistic approach to economic development, adopting a ‘whole economy’ approach by recognising that most development has some economic impact. The needs of the entire economy should therefore be considered including retail, leisure, tourism, sport, recreation and other services as well as the traditional employment uses defined under parts B1 to B8 of the Town and Country Planning Use Classes Order.”</i> Page 23 PCNPA LDP Annual Monitoring Report 2012</p> <p>NAEG asks how this now will affect Policy 3, and that the following be considered</p> <p>The text attached to Policy 3 mentions the necessity to develop Newport “as an attraction for quiet tourism (e.g. based on walking, cycling, bird watching, canoeing etc) out of season” However, most of the tourist attractions of this area - the sea and beaches, the paths and countryside, the history and archeology are free for visitors to enjoy - which means that they are only of indirect assistance to Newport's economy. At the same time, Newport's Castle is a private residence and Newport has no museum, sports or leisure centre - no "wet</p>	<p>The revision to Chapter 7 of Planning Policy Wales is taken into account when determining planning applications. The policy approach of the Local Development Plan remains within the wider approach advocated by the revision.</p> <p>The generic policies of the Plan allow for consideration of such proposals should they come forward within the Plan period. The Park Authority has no plans for sports or museum facilities, neither have we been approached by other providers of such facilities for sites to be allocated. Support and management both through and outside the planning system is however given to maintaining an optimum level of visitor facilities – the crucial element of which is the natural environment.</p> <p>The loss of the blue flag at the beach is regrettable and the issue has been raised with Dwr Cymru both in meetings and through consultation on their own investment programme. We have also referred to the need to improve inland water quality in a response to Natural Resource Wales in their current consultation called Challenges and Choices (closes December 2013). It is suggested that the Newport Area Environment</p>

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	<p>weather facility" - for use by visitors, which could provide some tourism income to the community. This shortcoming is also likely to become increasingly felt as the climate continues to deteriorate.</p> <p>It is notable that the text quoted above does not include sea bathing as a component of "quiet tourism" Sustainability objective 15 "<b>Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters</b>" notes that there are "12 blue flag beaches in the National Park in 2012 (one less than 2011)", without mentioning that the loss of Blue Flag status was from Traethmawr (The status was not regained the following year) Under the same heading, it is mentioned that the "Nyfer river between Nant Duad and the coast" is "of 'Poor' overall status" No mention is made of how this adversely affects bathing water quality at Cwm, Newport, and very probably Traethmawr. The text attached and Policy 3 itself makes no mention of a priority to improve this situation at both beaches.</p> <p>At the same time, a large proportion of visitor accommodation in and around Newport is "self catering" from which the highest part of the income, i.e. the rent, does not circulate locally when owners live elsewhere. Newport is short of serviced accommodation, the income from which is more likely to be used here, and there should be planning incentives to support its development.</p>	<p>Group submits a representation to express their concerns.</p> <p>As with other developments referred to above, the National Park Authority is not a provider of serviced accommodation. Any such proposals coming forward during the Plan period will be considered against the policies of the Plan.</p>
AMR/2012/009 Newport Environment Group	<p>Policy 3 states that "<i>the land use priorities will be... d) to protect and enhance the district shopping centre and community facilities which serve the town and rural hinterland</i>"</p> <p>NAEG urgently requests again that PCNPA revisits the decision to remove the community allocation of land for parking to serve the Memorial Hall which existed in the JUDP but was removed in the LDP The Hall is potentially a regional resource, accommodating more than 300 people seated for gatherings, but has only 6 parking spaces The age structure of users means that parking needs to be as close-by as possible The range of activities at the Hall is currently severely hampered by this major shortcoming which means that income is limited and insufficient to maintain a manager in post, let alone support other employment opportunities. The Hall needs</p>	<p>This matter was considered fully through the Local Development Plan Examination process. The Highway Authority has objected to the provision of a car park on the land opposite the Hall on the grounds of Highway safety taking into account the road and visibility for motorists and pedestrians. No other proposals have come forward but the Authority would be happy to consider any new suggestions coming forward, in conjunction with the Highway Authority.</p>

Ref	Comment	Officer Response
	<p>the support of appropriate LDP policies to become established as a wet weather facility for visitors and locals alike, a resource which the area otherwise seriously lacks.</p>	
<p>AMR/2012/010 Newport Area Environment Group</p>	<p>Currently, the principle source of employment in Newport is the “<i>district shopping centre</i>” The Monitoring Report states, under <b><u>F. Community Facilities, Retailing and Transport, Policy 48 Retail Analysis:</u></b> <i>Across the centres of Tenby, Saundersfoot, St Davids, Solva and Newport, and for all A use class units, the average vacant floorspace is 5.1% at 2011. This is below the national average of 13.4% and demonstrates vibrant centres. The next survey is due in 2013. Conclusion: No issues arise regarding the vibrancy of the Park’s retail centres</i>. (page 36)</p> <p>It is not clear whether the vacant floor space measured is Class A, but in any event an average across the National Park’s settlements should not be taken as a measure of the lack of fragility in Newport’s retail centre. In fact there has been a loss of retail outlets mostly to residential space and cafes during the JUDP, and in recent years the petrol station has closed, the repair garage moved out of the centre, one pub has been shut for some years and one shop in ten now stands empty.</p> <p>Further, Newport is not and will not be immune to the effect of the rapid rise in e-shopping by locals and visitors alike. The continued survival of the retail centre will depend on providing an environment where people enjoy to be, to meet one another casually, as well as to shop.</p> <p>Newport leaks trade to other centres because of the difficulty parking here which is especially trying for older people, and the National Park must ensure that the availability of casual on road parking close to the centre is not reduced any further, for instance as a knock on effect on Newport’s narrow roads of provision of new housing.</p> <p>Another deterrent to use of the town centre for shopping or leisure is the poor level of pedestrian safety. The long promised pavement between Cnwce and the Memorial Hall linking onto the wheelchair accessible route through the retail centre to the Bus Depot has not materialised and this also needs to be extended out to the Llwyngwair Manor, also as a cycle track. Particularly dangerous places are the north side of East Street near the square and outside the Post</p>	<p>Comments are noted. A more specific breakdown of vacant floor space by centre can be incorporated into the 2013 AMR, which has updated figures from a retail survey conducted in August 2013. The loss of retail units to residential will only be supported where non-viability can be proven. Cafes fall within use class A3 and contribute to the overall vitality of the centre, they are therefore included within the retail survey. The Authority also records vacancies by unit numbers and so has an up to date perspective on trends. This will provide a useful evidence base at LDP review.</p> <p>Maintenance and improvements to the highways and enforcement of parking controls is outside the control of this Authority. The NAEG is respectfully advised to contact the Highways Authority of Pembrokeshire County Council regarding this matter.</p>



Ref	Comment	Officer Response
	Office and Newsagents where many less mobile people have to walk out into the road (and there are several other examples that require attention and remedy).	
AMR/2012/011 Newport Area Environment Group	<p>NAEG thanks PCNPA for the invitation to comment on the Annual Monitoring Report</p> <p>However, it must be said that this community was not happy with the consultation process in development of LDP policy for Newport in the first place, particularly in that Newport now has a single large housing allocation on one site which will be difficult to accommodate both environmentally and socially, and when the community, through this organisation, Newport Town Council and individual objectors, put forward alternatives which the community saw as more appropriate, but which were rejected without any real communication between officers and local people involved.</p> <p>At this point in time, there must be a better way to involve local people in monitoring progress in the LDP, other than by inviting written comments on the Officers' prepared analysis. Nothing replaces continuous contact with communities in trying to understand their needs and aspirations, and this is particularly important in Newport which is so very geographically distant from the National Park's offices. NAEG requests that an appropriate face to face consultation process be set up here, together with appropriate site visits, in preparation for the 2014 review of the LDP.</p>	<p>The National Park Authority frequently goes beyond what is statutorily required in terms of public consultation. Also the concerns raised were considered by the Inspector when he found the Plan to be sound.</p> <p>Whilst we endeavour to provide opportunities for face to face public consultation, such as through the Community Panels our resources are limited. To this end we also use modern means of communication which help to provide a constant stream of information and opportunity for the public to communicate with us.</p>
AMR/2012/012 Pembrokeshire County Council	This paragraph says that 'as the Plan is newly adopted the effects of the Plan can only be limited in nature'. The Plan was adopted in September 2010 and is no longer 'newly adopted'. Therefore PCC suggests deleting this sentence.	This paragraph will be updated in the 2013 report to reflect the up to date situation.
AMR/2012/013 Pembrokeshire County Council	Para 1.4 Reference could be made to Welsh Water's AMP 5 programme and perhaps to emerging concerns over water resources in the County.	<p>Welsh Water's AMP5 programme is the current programme of investment for the company. The AMP6 Plan is currently published for consultation (August 2013) and the Authority has responded. The document is of a strategic nature with matters of detail not yet published. Reference to this document can be listed in this section.</p> <p><i>Recommend inclusion of reference to Welsh Water's AMP6 Plan in the list of contextual issues for the 2013 AMP. (See para 2.28 of the 2013</i></p>

<b>Ref</b>	<b>Comment</b>	<b>Officer Response</b>
		<i>AMR</i> ).
AMR/2012/014 Pembrokeshire County Council	Para 1.4(c) The anticipated publication of a revised TAN20 in summer 2012 did not happen - it is still awaited.	Noted. This reference will be deleted in the 2013 AMR.
AMR/2012/015 Pembrokeshire County Council	Paras 1.5 (table) and 2.19 In view of the outcomes of the appeal cases, the decision to withdraw the Building Extensions SPG and not to apply the part of policy 29 (sustainable design) dealing with building extensions when assessing planning applications is supported by PCC.	Comments noted.
AMR/2012/016 Pembrokeshire County Council	Para 1.14 The decision not to review the National Park LDP in the light of the 2010 to 2011 AMR is sensible - given the difficult economic conditions prevailing at the time (reflected in low rates of new development) and the comparative newness of the Plan during the period covered by this earlier AMR.	Comments noted.
AMR/2012/017 Pembrokeshire County Council	Para 2.15 New maps showing mineral resources to be safeguarded have recently been received. Although not wholly dissimilar from the earlier maps, there are many differences in the detail in comparison with the previous version.	Comments noted and agreed. The Authority's planning application constraints information are being updated accordingly. The updated version will be taken into account when the LDP is reviewed. (See para 1.2, bullet point 5)
AMR/2012/018 Pembrokeshire County Council	Para 2.16 Footnote 9 should reference PPW Edition 5.	Noted and agreed. This will be updated in the 2013 AMR.
AMR/2012/019 Pembrokeshire County Council	Para 2.24 PCC suggests combining the second and third sentences to read 'Draft supplementary planning guidance on this topic was subject to a consultation which closed on 19 <sup>th</sup> October 2013.	The 2013 AMR will be updated accordingly (see para 2.22).
AMR/2012/020 Pembrokeshire County Council	Para 2.26 PPW edition 5 indicates that a TAN on 'Planning for Economic Development' is being prepared by the Welsh Government, but it wasn't published in 2012.	These references have not been included in the 2013 Annual Monitoring Report.
AMR/2012/021 Pembrokeshire County Council	Para 2.31 The text makes it clear that Cadw believes Dale Airfield to be the most important WW2 airfield in Wales. However, it does not set out PCNPAs position on this matter. Does PCNPA support Cadw's view?	The relevant section of the 2013 AMR has been updated to reflect the current position.
AMR/2012/022 Pembrokeshire County Council	Para 2.32 Bullet point on One Planet Developments - until the outcome of the Welsh Government research is known, it seems premature for PCNPA to 'not envisage' a review of Plan policy, unless information has been provided to PCNPA by Welsh Government in advance of formal publication.	The 2013 AMR has been updated to reflect the current situation. There are no implications in relation to Plan review arising from the newly published guidance.
AMR/2012/023	Para 2.27 (second iteration)	Noted. The 2013 AMR reflects the

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Pembrokeshire County Council	<p>The penultimate sentence of this paragraph states that 'In the longer term, the preparation of a Community Infrastructure Levy will be heavily dependent on the County Council as the service provider'. However, PCC would not be the only service provider involved - for instance, DCWW and Welsh Government would also be likely to have a significant role. If CIL introduction is contemplated in the future, it would be sensible for PCC and PCNPA to discuss the possibility of a collaborative approach.</p>	current situation.
AMR/2012/024 Pembrokeshire County Council	<p>Indicator 3a <b>Significant issue of potential concern to PCC</b> The target is '0 approvals contrary to policies that prioritise certain uses seen to sustain communities in the Plan'. Four departures are recorded.</p> <p>The analysis explains the reasons for the four departures, but nonetheless an amber performance rating would be more appropriate than green. Perhaps, given the exceptions that have arisen, the target is too onerous? Suggest deletion of the sentence 'no conclusions can be drawn as to the effectiveness of the Policy'.</p>	<p>The applications recorded are not departures to the Local Development Plan. All have been determined in line with Plan policy. They are listed to demonstrate how on each occasion when an application for 2 or more holiday units was approved they met with Plan policy.</p> <p>The 2013 AMR has been updated to reflect the current situation which continues to comply with Policy – hence the green performance rating.</p>
AMR/2012/025 Pembrokeshire County Council	<p>Indicator 7 – major development <b>Significant issues of potential concern to PCC</b> None (The WG decision to approve the Trefigin Quarry extension is welcomed by PCC).</p>	Comments are noted and agreed.
AMR/2012/026 Pembrokeshire County Council	<p>Indicator 8 - Minerals <b>Significant issues of potential concern to PCC</b> None (The WG decision to approve the Trefigin Quarry extension is welcomed by PCC).</p> <p>The desirability of transferring minerals operations from within the National Park to locations outside the National Park over time is understood and accepted by PCC. PCC takes the view that this is an issue that requires resolution at a regional (not just County) level.</p>	Comments are noted and agreed.
AMR/2012/027 Pembrokeshire County Council	<p>Indicator 10 – Sustainable Design <b>Significant issues of potential concern to PCC</b> PCNPA no longer considers this indicator to be appropriate.  PCC agrees with PCNPAs reasoning on this.</p>	Comments are noted.
AMR/2012/028 Pembrokeshire County Council	<p>Indicators 12a and 12b – Renewable energy The AMR text indicates that: 'Biomass in particular is seen as a potentially significant</p>	Comments are noted and agreed. Those technologies that contribute to the Renewable Heat Target comprise

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	<p>contributor to the renewable heat targets in the Plan and generally enjoys permitted development rights'. The conclusion states that 'Even though permitted development rights mean that all proposals cannot be counted, the Plan is ahead of potential target on electricity generation (if all those with permission are assumed to have been constructed) but behind on heat generation. This is likely to be due mainly to the substantial contribution that biomass was expected to make not being able to be counted in the figures, as it generally enjoys permitted development rights'. Does the NPA have any evidence to substantiate their view that biomass proposals coming forward under permitted development rights are making a significant contribution to renewable heat targets? If the answer to that question is no, then a potential major contributor to the monitoring of the indicator cannot be measured. In that context, the AMR should reference the need to reframe the monitoring target at Plan review.</p>	<p>solar thermal, heat pumps (water, ground and air) and biomass. Permitted development rights for renewable heat energy installations on both domestic and commercial properties have been extended in the past year, under the Town and Country Planning (General Permitted Development) Order, Schedule 2, Parts 40 and 43, as amended in 2012. However, in respect of non domestic buildings, flues which serve biomass installations with an output of more than 45kw, or on buildings that already have an existing flue (thus causing more than one flue on one building) are not covered by the rights. Within the Authority's Renewable Energy Assessment, medium scale biomass installations are classed as those serving schools, offices, leisure facilities etc and would generally be greater than 45kw installations, ranging from 50kw installations for small offices to 300kw installations for leisure complexes within the National Park. Of the non-domestic properties which are estimated to require greater than 45kw biomass installations to provide suitable heat power (if this technology was to be installed), it is estimated that the potential contribution from medium scale biomass installations within the National Park, that would require planning permission would be 26 GWh of heat generation.</p> <p>It is therefore recommended that the target be reduced to this amount, to more accurately reflect the amount of renewable heat generation that the plan can expect to deliver in future AMR's.</p>
<p>AMR/2012/029 Pembrokeshire County Council</p>	<p>Indicator 15 – effectiveness of policies <b>Significant issues of potential concern to PCC</b> PCNPA has withdrawn the SPG on Building Extensions and is not applying part of policy 29 when assessing planning applications.</p> <p>In view of the outcomes of the appeal cases, the decision to withdraw the Building Extensions SPG and not to apply the part of the policy 29 (sustainable design) dealing with energy efficiency improvements in whole buildings (when dealing with extension proposals) is supported by PCC.</p>	<p>Comments are noted.</p>

Ref	Comment	Officer Response
AMR/2012/030	<p>Indicator 21 – Housing</p> <p>The apparent shortfall in housing land supply in the National Park is a significant concern to PCC. It is therefore suggested that performance should be recorded as 'red' rather than 'amber', given the recorded shortfall in the context of the acknowledged importance of housing delivery. In the analysis section, the NPA asserts that it is 'continuing to approve applications for residential development beyond that allocated in the Local Development Plan'. This could be interpreted as an indication that the LDP's housing allocations are inadequate, particularly as, even with the consented but un-allocated sites added in, there is still a shortfall.</p> <p>The indication that a Deliverability Study is being prepared by PCN PA is welcomed by PCC. The continuing dialogue with landowners, local housing associations, the RHE and stakeholders is supported, likewise PCNPA's review of its own land holdings. However, while the reference to the PCNPA's application to develop land in PCC's planning area is noted, as the consent contributes to the housing land supply in an adjoining LPA's area, it is not appropriate to mention it in this report. This is because it represents a contribution towards delivery of the Council's LDP strategy rather than that of the National Park Authority and hence PCC requests that this reference be removed. To do otherwise would set a dangerous precedent of seeming to allow LPAs to bring forward housing development in other LPA areas, to offset a shortfall of such development in their own areas.</p> <p>It is noted that the shortfall in housing provision is a matter that will be addressed at formal review (in 2014). Foundations for that review should be put in place now.</p>	<p>During the last year, PCNPA commissioned a study to investigate possible constraints to allocated sites coming forward for development. The study was completed in March 2013 and the outcomes showed no significant nor insurmountable constraints for the allocated sites. In a number of cases there are additional costs to provide access or sewage infrastructure to link to the public system and this combined with other S106 requirements are likely to be a reason for landowners and/or developers withholding development until they can be more assured of its viability. The Authority's affordable housing requirements have also been quoted by PCC and others as a reason for sites not being developed at the Scrutiny Committee sessions which have been held over the past year to consider affordable housing delivery in the Park. Appendix 2 of the 2013 Annual Monitoring Report sets out what are considered to be the timescales for bringing allocated sites forward in the Plan. Those sites that have significant difficulties are small in number. In terms of those sites that have issues to address water supply and/or sewage disposal are the most dominant issue. Concern over affordable housing delivery is second to this along with issues over landowners' intentions. The Authority has instigated additional work to help encourage landowners, including the County Council, to bring sites forward. The Authority would welcome an opportunity to discuss bringing forward the Council's land which is allocated in the Local Development Plan for development. The County Council, as land owner, is a significant contributor to the Plan's housing land supply.</p> <p>In the meantime, the 2013 survey of housing sites in the National Park is showing an encouraging increase in the number of sites commencing construction, although it is noted that the majority of sites remain small or single plot sites which will not be included in the current JHLAS study.</p> <p>The mention of PCNPA's own site</p>

Ref	Comment	Officer Response
		<p>within the PCC area was to demonstrate that the Authority are contributing towards the overall supply of affordable housing in Pembrokeshire and not to suggest anything more than this. The Authority is aware from the Council's comments on the Pre-Deposit consultation on the Authority's Local Development Plan that this Authority is expected to provide for its affordable housing requirements.</p> <p>The 2013 JHLAS will provide updated information to include within the 2013 AMR and it is agreed that any continued shortfall in housing land provision should be addressed through formal review of the Plan.</p>
<p>AMR/2012/031 Pembrokeshire County Council</p>	<p><b>Significant issues of potential concern to PCC</b> Construction of new affordable housing has been at a significantly lower level than anticipated. Since adoption of the PCNPA LDP, 63 market dwellings and 1 affordable dwelling have been completed.</p> <p>PCNPA explains the low levels of affordable housing provision by referring to the economic downturn, difficulties in the banking sector and problems with securing loans and grants. These are all relevant and significant considerations. The analysis section suggests that many developers are choosing not to develop sites for these reasons, rather than because of deliverability issues. The PCNPA's forthcoming Deliverability Study will provide additional information on this aspect. Notwithstanding these comments, it is a matter of great concern that while 26 market dwellings have been completed during this monitoring period, no affordable dwellings have been built during the same period. Indeed, while 63 market dwellings have been built since LOP adoption, only one affordable dwelling has been completed over the same period. Looking at the bigger picture, the National Park Authority's LDP anticipates construction of 530 affordable dwellings by 2021, which equates to approximately 48 affordable dwellings per annum over the 11 year period from 2010 to 2021.</p> <p>There is a trigger relating to affordable housing, which indicates that 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</p>	<p>Please see the 2013 AMR which provides an up to date explanation of how issues relating to housing and affordable housing are being tackled.</p>

Ref	Comment	Officer Response
	<p>available by that date, immediate commencement of a review of the Affordable Housing Strategy Policy will commence. Even given that there are 35 consented affordable dwellings in the National Park awaiting construction, it is clear that the scale of affordable housing development required to avoid the policy review trigger would be completely unprecedented. It is considered very unlikely that delivery of affordable dwellings in the National Park by 2021 will approach the anticipated figure, particularly in the absence of any clear evidence that a major housing boom might arise between now and 2021. In that context, and given that full review of the National Park LDP will be required to commence in 2014 anyway, there is no reason to wait for commencement of review of this policy. PCC is aware that the National Park Authority Scrutiny Committee is considering the effectiveness of the delivery of the NPA's policy on affordable housing in the context of the original objectives and targets. That indicates concern within the National Park Authority as to how effective the policy is, even given the external factors that have undoubtedly affected its implementation. The AMR indicates that the Scrutiny Committee will report back in April 2013 and PCC requests that the NPA take urgent action to address any questions over policy effectiveness that the report might indicate. While accepting that market conditions are particularly challenging at the moment, the Council considers that the performance rating for this indicator should be 'red' rather than 'amber'. The NPA should initiate review of its affordable housing strategy policy at the earliest opportunity and give urgent consideration to whether other mechanisms are available that might bring forward delivery of affordable housing. Reference is made in the AMR to the emerging 2012 JHLAS and an increase in the number of housing completions this is likely to show. However, there is no indication whether this comment relates to market housing, affordable housing, or both. It is recommended that provisional figures for the 2012 Study should be included in this AMR. In the section on 'overall supply for the Plan period' reference is made to current completion rates and how, based on those rates, there is likely to be a surplus of housing land at the end of the Plan period. That seems to be a direct reflection of the low build rates.</p>	
AMR/2012/032	Indicator 24 – Housing density	The Authority makes careful

Ref	Comment	Officer Response
Pembrokeshire County Council	<p><b>Significant issues of potential concern to PCC</b></p> <p>The housing density expectations have not been met in all cases.</p> <p>Some of the reasons given for exceptions to the general expectation are legitimate (for instance access constraints). Reference is also made to exceptions being made to allow lower densities that reflect 'the current pattern of development'.</p> <p>This needs to be balanced carefully against the need to deliver sustainable development and to make best use of available development land. If too many exceptions are made for this reason, it will increase pressure to release further sites.</p>	<p>consideration of density of development for all applications. Just 2 applications were directly relevant to this target and of the two, just one fell below the density target but was deemed acceptable due to the pattern of development (this is caveated within the policy criterion). Even so in this instance density of the site was increased by 100% to the previous development.</p> <p>Other applications where pattern of development was deemed to be a relevant factor were for single plots and the commentary included in the Annual Monitoring Report provides further details.</p> <p>It is not considered that this policy is giving any cause for concern at present. Analysis of applications approved within the 2013 monitoring period will be used to inform the 2013 AMR.</p>
AMR/2012/033 Pembrokeshire County Council	<p>Indicator 25 – effectiveness of policies</p> <p>The advice to be sought from the Planning Inspectorate is noted.</p>	<p>Comments are noted. There were no issues arising from this appeal decision regarding the implementation of the Policy 45. The Inspectorate advised that 'in the particular circumstances of this appeal, the Inspector reasoned that the importance of preserving the character or appearance of the Conservation Area outweighed the lack of affordable housing provision.'</p>
AMR/2012/034 Pembrokeshire County Council	<p>Indicator 28 – greenfield and open space lost to development</p> <p>The analysis section indicates that of the 24 green-field applications approved by the NPA, only one was contrary to LDP policies. In that context, PCC suggests that, at Plan Review, a re-evaluation should take place of the 0% target that applies in all cases (except where land is released for affordable housing or community facility provision).</p>	<p>Clarification on this comment was sought from PCC Officers and a further response received on 9<sup>th</sup> August 2013. This clarified that as the text implies that the policy approach allows for some greenfield development to occur, the 0% threshold should be amended either by raising the figure or by specifying the types of development to which it relates.</p> <p>The trigger for considering such a change in the AMR is 1 or more inappropriate development. In 2012 1 application was permitted which was contrary to the policies of the Plan and permitted development which used a greenfield site. In the 2013 monitoring period there have been no</p>



Ref	Comment	Officer Response
		applications determined contrary to plan policy on greenfield land. Thus no pattern is emerging to cause concern.
AMR/2012/035 Pembrokeshire County Council	<p>Sustainability Indicator 1 Paragraph 2 refers to the PCC report 'The State of Wildlife in Pembrokeshire', which was published in 2011. PCNPA records this report's conclusion that biodiversity associated with agriculture is generally in decline (although there are some improvements in arable habitats). The report pre-dates the monitoring period for the AMR and hence does not provide evidence of agriculture causing a decline in biodiversity in the National Park during the 2011 to 2012 LDP AMR monitoring period.</p> <p>Paragraph 2 should be amended to make it clear that the PCC report presents historic information which might not necessarily apply during the April 2011 to March 2012 monitoring period.</p>	Text under this SA objective already mentions that there have been no updates to this report and refers to it as context in the absence of any more recent and comparable information.
AMR/2012/036 Pembrokeshire County Council	<p>Sustainability Indicator 4 Paragraph 2 records that, since the LDP was adopted, no applications that would require or generate provision for walkers and cyclists have been determined. The AMR indicates that it is therefore not possible to assess how the LDP is contributing towards this objective.</p> <p>The conclusion should be that, so far, the LDP hasn't contributed towards this objective. Paragraph 2 should be amended accordingly.</p>	<p>Comment is noted and agreed.</p> <p>Recommend that paragraph 2 is amended accordingly in the 2013 AMR.</p>
AMR/2012/037 Pembrokeshire County Council	<p>Sustainability Indicator 5 Paragraph 2 records that 'approvals for self-catering accommodation since adoption of the plan help meet the aim to improve the suitability of accommodation for year round use, though they also increase the overall provision. Therefore the planning contribution to this Sustainability Objective can be seen as mixed. During this monitoring period four approvals for two or more self-catering holiday lets were given'.</p> <p>The NPAs policy approach to self-catering accommodation, as set out in policies 35 and 37, is of a restrictive nature, referencing a need to give priority to affordable housing over self-catering accommodation where need is identified and, through policy 37, setting a number of other restrictions.</p> <p>In that context, it is difficult to demonstrate a</p>	<p>It is acknowledged in the commentary of this objective that increasing visitor numbers will largely be due to activities beyond the influence of the LDP. The policies of the LDP allow for consideration of proposals linked to the visitor economy, although these in themselves will not necessarily generate additional visitors but provide accommodation and attractions for them.</p> <p>It is not clear what can be gained from changing the text of the AMR as suggested by PCC as this is commentary referring specifically to increasing the number of visitors. A consideration of applications for holiday lets refused because of the need for affordable housing would</p>

Ref	Comment	Officer Response
	<p>causative relationship between positive promotion by the NPA of self-catering accommodation proposals and the four approvals as a means of achieving sustainability objective 5.</p> <p>PCC suggests re-wording the second paragraph to make it clear that, although there have been a few planning approvals, the NPA's approach to self-catering accommodation is fairly restrictive, reflecting, amongst other things, a need to prioritise affordable housing.</p>	<p>provide a guide to the restrictive nature of the policy and may be a matter more appropriately considered through objective 8.</p> <p>This objective (5) however is not intended to measure restriction.</p>
<p>AMR/2012/038 Pembrokeshire County Council</p>	<p>Sustainability Indicator 8 The shortfall in provision of affordable housing in the National Park is a significant concern.</p> <p>See previous comments.</p>	<p>Please see response to AMR/2012/031.</p>
<p>AMR/2012/039 Pembrokeshire County Council</p>	<p>Sustainability Indicator 11 With reference to the Trefigin extension approval, one of the reasons that PCNPA supported the application was because extending within the National Park would have less visual impact than extending a different part of the site in PCC's planning area. Previously consented land in PCC's planning area has been relinquished in conjunction with this permission. The decision on this application was made by Welsh Government, post LDP adoption, so the reference to the approval being made under the JUDP needs to be reconsidered, as WG would have been well aware of PCNPAs adopted LDP at the time it made the final decision.</p> <p>Reword the item on Trefigin to reflect the circumstances of the approval. PCC and PCNPA have previously agreed their position on this site.</p> <p>It might be helpful to reference the long-term aspiration to reduce minerals production in National Park locations and to work collaboratively with other LPAs in SW Wales to seek alternative opportunities within the region, rather than over-emphasising the Trefigin decision, which is an interim solution.</p>	<p>These comments clarifying the position are noted. This application is no longer relevant to the 2013 AMR period (April 2012-March 2013) and so no further reference will be made.</p> <p>In relation to the final point raised the preferred direction of travel and the need for collaborative working is highlighted within paragraph 4.106 of the LDP and so it is not considered necessary to also highlight this in the 2013 AMR.</p>
<p>AMR/2012/040 Pembrokeshire County Council</p>	<p>Sustainability Indicator 12 The Tenby (Salterns) Civic Amenity Site is no longer fit for purpose and cannot be extended.</p> <p>Reference the need to find an alternative location in SE Pembrokeshire for the Tenby CA Site.</p>	<p>This is already acknowledged in paragraph 4.120 of the LDP.</p>
<p>AMR/2012/041</p>	<p>Sustainability Indicator 15</p>	<p>Comment noted. No water resource</p>

Ref	Comment	Officer Response
Pembrokeshire County Council	<p>DCWW has recently set out its proposals for dealing with concerns regarding the long-term water resource position in Pembrokeshire.</p> <p>The PCNPA Deliverability Study should draw out any constraints that water resource capacity may cause for the deliverability of individual allocations. Paragraph 2.26 of PCC's LDP provides further information.</p>	<p>capacity issues have been highlighted for sites allocated in the LDP.</p>
AMR/2012/042	<p>I refer to your emailed consultation letter dated 5th February 2013 and would advise that the Welsh Government (Transport) as highway authority for the motorway and trunk roads have no comments on these proposals. The Welsh Government (Transport) confirms that it would always support Applicant's seeking pre-application planning advice such that traffic generation can be minimised/mitigated against for developments within the National Park and notes the monitoring report update for 2012.</p>	<p>Comments noted.</p>
AMR/2012/043	<p><b>Summary of representation</b></p> <p>Tenby has a unique location and design which needs an iconic identity, including a blue water marina to encourage visitors from Wales, England, Ireland and the continent. It would also create thousands of jobs and supply a stop-off point on the west coast of Wales for entry to the Port of Milford Haven, with quality shops, restaurants and wine bars.</p> <p>A Welsh Government report in 2004 '<i>Catching the Wave</i>' recognised the need for a 'daisy chain' of marinas along the Welsh coastline. This was followed in 2007/08 by the publication of a Coastal Tourism Strategy which examined the potential of improving existing facilities and creating new marinas as a key element in developing the future volume and value of leisure boating.</p> <p>This proposal is for a new additional harbour with all-tide access to complement the existing harbour which dries out at high-tide. It would include provision of affordable housing and sea-front apartments; harbour facilities, including retail units; and a cruise ship berth.</p> <p>The Local Development Plan does not accommodate any provision for this or the Coastal Tourism Strategy and therefore a change to the wording of Policy 17 is paramount.</p> <p>Two layout options for a marina</p>	<p>The <i>Catching the Wave</i> (2004) document referred to was published as a Final Draft document and taken into consideration when the Local Development Plan was being prepared. It's findings are referred to in the Enjoyment Background Paper to the Plan. This document listed existing harbours, marinas and yacht stations and also locations where there may be potential for additional berths. Only one location within the National Park is listed – this being Saundersfoot, which is listed as being 'aspirational'.</p> <p>The later Coastal Tourism Strategy acknowledges the economic benefits of marinas and ancillary facilities but also that they generally require support from residential development to be viable. It further acknowledges that many potential marina locations in Wales are not suitable for significant marina-related housing and thus smaller-scale developments of 350-400 berths may be possible, along with smaller harbour schemes. Lessons learned from elsewhere include recognition that any marina strategy is a long-term strategy. Most of the identified proposals in this report would require public funding and the Welsh Government are evaluating the schemes in order to determine best value for money and where proposals fit with national and</p>

Ref	Comment	Officer Response
	<p>development are proposed, based off the Waterwynch headland at the northern end of North Beach. They include:</p> <ul style="list-style-type: none"> <li>Vehicular and pedestrian access through the cliff;</li> <li>11 new builds (mixed use);</li> <li>Rock armour protection, cliff protection and roadway;</li> <li>Car park;</li> <li>Marina and pontoons;</li> <li>Marina protection floating outer wall;</li> <li>Cruise ship berth.</li> </ul>	<p>local policy. Naturally each proposal will require a full assessment including environmental and wider conservation interests and preparation of a robust business case. Tenby is not identified as a potential location in this study. Local locations included are the proposed marinas at Fishguard and Pembroke Dock along with upgrading of facilities at Milford Haven.</p> <p>It is within this context that the National Park Authority prepared it's Local Development Plan and is fully consistent in that respect.</p> <p>In preparing Local Development Plans, planning authorities are required to ensure that adequate provision is made for development and infrastructure provision and that proposals are realistic and likely to be implemented within the Plan period.</p> <p>This proposal for a new marina at Tenby does not accord with the National strategy and is not supported with the necessary assessments.</p>

**Appendix B**

**Pembrokeshire Coast National Park  
Authority**

**Annual Monitoring Report**

for the Local Development Plan



**2013**

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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 2012 to end of March 2013. The main conclusion is that there has not been a significant change which would warrant a review of the Plan at this time.<sup>1</sup>
- 1.2. The tables below provide a visual aid of the effectiveness of policies during this Annual Monitoring Report using the 32 indicators analysed in the Monitoring Report. Commentary and action points are provided for those that are underperforming.

Target	Number of Indicators	
Targets / objectives are being achieved.	29	
Target	Number of Indicators	
Targets have not been achieved or poor performance, but no concerns over implementation of policy / objectives - see below for a summary of the issues.	2	

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

- 1.3. The Authority is required to demonstrate a five year effectively available housing land supply. The 2012 report concludes that the National Park has a 3.5 year land supply.
- 1.4. 50% of sites are coming forward as per the timetabling proposed in the Local Development Plan. 43% are experiencing minor delay. 8% are considered to be experiencing significant delay. In terms of issues to address these predominantly relate to water and sewerage treatment. Concerns regarding the affordable housing requirement and issues around landowner intentions are the second most common set of issues.
- 1.5. To help bring sites forward the National Park Authority is continuing with the following actions:
- a) **Approving planning applications for housing developments**, provided all relevant policy considerations are met. The Authority is continuing to approve applications for residential development beyond that allocated in the Local Development Plan.
  - b) The Authority is **continuing to liaise with land owners**. Since the beginning of 2013 the Authority has had direct contact with landowners of 14 (of 34) of the sites allocated in the Plan who have indicated an intention to bring their land forward for development in the short to medium term. This has been informed by the Land Allocation Delivery Study carried out for the Authority.

<sup>1</sup> Local Development Plan Manual, page 111, Section 9.6.

c) Officers in anticipation of the outcomes of the current affordable housing **Scrutiny Review Committee** is also commissioning work which should assist in bringing sites forward.

- A revised supplementary planning guidance on affordable housing for the National Park ready for public consultation.
- The product of a revised viability appraisal of sites allocated in the Authority's Local Development Plan communicated to landowners and relevant developers. This will take account of new information provided regarding the costs of providing infrastructure for the sites.
- To provide a report on expected current residual values being operated in Wales' planning authority areas and National Parks in England.
- Identified opportunities to streamline the planning application process where proposals include an element of affordable housing.
- To put in place partnership arrangements and an appropriate delivery vehicle to implement proposals on sites allocated in the Local Development Plan that are owned by Pembrokeshire County Council.
- In light of the above provide a report of findings on any implications for the Local Development Plan's next review.

d) As a result of the Scrutiny Review Committee into affordable housing delivery a **change in perception campaign** is also proposed to ensure the Authority's approach to negotiating affordable housing is understood is also being programmed.


1.6. **Conclusion:** The current consultant's commission (to report April 2014) will firstly seek to assist in bringing sites allocated in the Local Development Plan (that include affordable housing) forward and secondly to assist in inform any requirement for a review of the housing land allocations in the Plan.

**Target for planning permissions to contribute to an overall Renewable Heat Target for the National Park.**

1.7. Permitted development rights for the relevant technologies for this target have been extended from when the Authority's original renewable heat target was originally formulated. Therefore a revised target of 26 GWh of heat generation has been inserted at Indicator 12b of the Plan.

1.8. **Conclusion:** The Plan is behind target. Policy 33 and the Authority's Renewable Energy Supplementary Planning Guidance is supportive in principle. Approval rates for permissions sought would also support this view point.

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

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

1.9. The target for affordable housing delivery in the Local Development Plan is 530 affordable



houses over the Plan period with 80% of the provision planned for delivery by the end of the financial year 2014/2015 to be either built or under construction. This would mean that an estimated 228 affordable dwellings would need to have been built between 2007 and 2015 or be under construction. This would be an estimated 28 affordable dwellings to be completed annually to achieve the Plan's target provision. Between 2007 and 2013 a total of 289 houses have been completed of which 8% (21) are affordable. A total of 195 houses are under construction of which 16% (32) are affordable units. The Authority's Local Development Plan affordable housing policy, Policy 45, is not fully achieving its key outcome in terms of the number of affordable homes anticipated as being built or under construction by the end of the financial year 2014/15 targets.

- 1.10. On single plots an affordable housing contribution is payable to assist with providing for affordable housing provision. As at September 2013 10 planning permissions include a requirement for an affordable housing contribution. The affordable housing contribution was introduced from the 1<sup>st</sup> October 2011. Given the recent economic climate for house building and the need for viability testing of these proposals this is considered to be a reasonable return.
- 1.11. **Conclusion:** The evidence shows that the delivery of affordable housing is currently falling short of the authority's targets. This is reflective of the general downturn in the housing market over previous years, however, key actions have been identified (see above under Indicator 21).
- 1.12. Below are additional issues arising from this third and previous monitoring reports along with a list of proposed actions in response:
  - **Rural enterprise dwellings** being permitted (previously only referred to as agricultural and forestry dwellings): Policy 7 of the Local Development Plan will require a technical update at formal review stage to take account of this widening of opportunities). Current applications are being considered under the new national policy and guidance. (Annual Monitoring Report 2011 refers)
  - **Policy 29 Sustainable Design (in part):** That element of the policy which required energy efficiency improvements being sought in the original building as well as a proposed extension has not proved workable and is no longer being implemented by the Authority. It requires deletion from the Plan at review stage. (Annual Monitoring Report 2012 refers)
  - **Sustainable Design Indicator:** The Indicator which refers to incorporating renewable energy technology with a scheme is proposed for deletion at review stage. It is not being monitored by the Authority. (Annual Monitoring Report 2011 refers)
  - **Renewable Energy Target:** The target for renewable heat under Policy 21 has been updated to reflect the estimated target contribution from those proposals that require planning permission.
  - **Minerals Mapping:** The Welsh Government has published the Mineral Resource Map of Wales in 2010. Guidance and maps for planning authorities in relation to safeguarding the minerals resources of Wales has been conducted by the British Geological Survey, published in October 2012 and is entitled 'Aggregates Safeguarding Maps of Wales'. It includes a map for South West Wales, which details the location and extent of mineral resources for the whole region and highlights those that should be safeguarded, it includes the recommended separation distances advised within Minerals Technical Advice Note 1 Aggregates. In terms of its implications, the Authority's minerals safeguarding zones should be checked and updated accordingly in the constraints mapping for development management purposes and in the Local Development Plan at

review (Annual Monitoring Report 2013 refers).

## **Planning Improvement Fund 2013-14 Requirements**

- 1.13. Highlighted is the requirement to identify policies that are not being implemented and for each such policy, identify:
- Reasons why the policy is not being implemented
  - Steps that can be taken to enable the policy to be implemented
  - Whether a revision to the plan is required
- 1.14. In terms of issues of implementation there are 56 policies in the Plan. 36 have been referred to during the monitoring period in planning applications considered. 20 have not been engaged. These include some strategy policies which cross refer to more detailed policies of the Plan that have been applied. Some are in place to deal with specific issues such as minerals and waste and would not be used regularly in any case. Monitoring of usage until the review period will provide a better time frame for considering the need for policies.
- 1.15. Appendix 2 refers to progress on specific land allocations. Of the 31 allocations in the Plan that include affordable housing provision 17 are expected to come forward as per the Local Development Plan timetable, 10 are experiencing minor delays and 4 significant delays. On the 2 community facility allocations there have been preapplication discussions on 1 site (earlier in the Plan period) and a planning permission approved on the second site in this annual monitoring period. Of the 7 road and cycle schemes 1 has been completed; 1 is programmed to commence in November 2013; 2 are actively under investigation and no progress has been made on 3 schemes. Actions in relation to improving on the delivery of housing sites are set out above and under Context and Indicators 21 and 22 in Chapter 2E.
- 1.16. Specific issues regarding implementation and dealt with throughout the Monitoring Report.
- 1.17. Annual Monitoring Reports should also:
- Specify the housing land supply from the current Housing Land Availability Report for that year, and for the full period since adoption of the plan.
  - Specify the number of net additional affordable and general market dwellings built in the area for that year, and the full period since the adoption of the Plan.
- 1.18. Please see above and under 'Context' and Indicators 21 and 22 in Chapter 2E for this information.

## **Sustainability Appraisal**

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

## Consultation and Further Information

1.20. 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 2013 document are invited and will inform the production of the next report in 2014. Any comments and queries relating to this Monitoring Report should be addressed to:

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Pembrokeshire Coast National Park Authority

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Pembroke Dock

Pembrokeshire

SA72 6DY

Tel 0845 345 7275

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

## Consultation on the 2012 Monitoring Report

1.21. The 2012 Monitoring Report was made available for comment to relevant statutory bodies, stakeholders and individuals and was published on the Authority's web site. Comments on the 2012 document were reported to the National Park Authority on the 23 October 2013. Summarise outcome following National Park Authority meeting on the 23<sup>rd</sup> October 2013.<sup>2</sup>

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


<sup>2</sup> <http://www.pembrokeshirecoast.org.uk/default.asp?PID=411>

## 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 Assembly Government Core Indicator	<b>W</b>

## National Park Purposes and Duty and the Spatial Strategy

### Key Outcomes

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

### Context


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

2.5 Public transport is limited in the area in which all of these villages are located and the County Council was approached to examine the potential for providing additional services with the increased customer base through the development of the housing sites allocated in these villages. Unfortunately, in the current economic climate the provision of new services is not possible, and there have been reductions in existing services during 2012 due to the reduction in the Local Transport Services Grant to Pembrokeshire County Council from the Welsh Government. This has resulted in the stopping of all publicly subsidised bus services on Sundays, other than the Coastal Bus services which continue to operate seven days a week through the summer, but reduced to two days (from three days) per week in the winter.

2.6 When considering planning applications, especially those in more remote locations, the Authority tests for accessibility to the nearest Centre. To test accessibility supplementary planning guidance has been adopted in June 2013 just beyond this year's monitoring period.<sup>3</sup>

2.7 **Siting of Farm Buildings:** Supplementary Planning on siting and design of farm buildings has been prepared and adopted in June 2012.<sup>4</sup>

### Policy Performance

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

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


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

**Trigger:** 3% of planning applications<sup>5</sup> decided contrary to recommendation in any one year.

**Reason:** To identify patterns over the Annual Monitoring Report period.

**Analysis:** During the period April 2012 to March 2013 328 planning applications were received by the National Park Authority. 2% of applications (7) were approved contrary to recommendation.

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


Policy Area	Indicator 2	Target	Performance
National Park Purposes & Duty	Developments which engage the Sandford Principle – where conflict between the two national park purposes becomes acute, the first one must prevail. Carrying out the socio-economic duty in National Parks must be in pursuance of the purposes to Policy 1 ( <b>overarching indicator</b> ).	Target - 0 approvals within or impacting on the National Park which breach the Sandford principle or which result in conflicts between the duty and purposes. ( <b>overarching target</b> )	

**Trigger:** 1 application approved contrary to the Sandford Principle in any one year.

**Reason:** The Sandford Principle is a central component of the National Park purposes and 1995 Environment Act.

**Analysis:** No planning applications with a decision date between 1 April 2012 and 31 March 2013 have engaged or breached the Sandford principle.

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

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.	

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


**Trigger:** Approval of 2 applications contrary to policy 35 c) in any one year.

**Reason:** This policy provides a windfall opportunity for affordable housing, and with limited land available for development early scrutiny of the policy is appropriate.

**Analysis:** Two applications for 2 or more holiday letting units were approved by the Authority during the monitoring period. The reasons for allowing the units to be converted to holiday accommodation rather than affordable housing units were:

- i. an application for the conversion of a range of Listed Buildings to 5 holiday letting units was permitted as the site was not considered to be suitable or appropriate for affordable housing provision relating to the layout of the buildings and the potential impact of garden/curtilage areas on the Listed Building.
- ii. In a second case the application was for the sub-division of a residential dwelling to two holiday letting units. Thus this created only one new unit which is below the threshold for seeking affordable housing provision.

**Conclusion:** These decisions are in accordance with the overall policy position of the Local Development Plan and the target met for this monitoring period.

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	

**Trigger:** Approval of 2 planning applications contrary to the policy 42d) or Policy 44 third last paragraph in any one year.

**Reason:** The National Park does not contain many large scale employment uses and their loss to other uses must continue to support the local community. They are valuable to individual communities and a stringent threshold is appropriate.

**Analysis:** No approvals contrary to this policy were recorded.


**Conclusion:** This does not show an undermining of Local Development Plan policy.

Policy Area	Indicator 3c	Target	Performance
Policy 45 & Policy 42	Housing & Employment	Use targets for the delivery of affordable housing and employment.	

Please see analysis under Indicators 16 and 22.

Policy Area	Indicator 3d	Target	Performance

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

Policy Area	Indicator 4	Target	Performance
	Effectiveness of Policies (Policy 2 to 7) & Supplementary Planning Guidance when dealing with Applications at Appeals.	Inspector does not raise issues regarding the effectiveness of the policies or supporting supplementary planning guidance.	
<p><b>Analysis:</b></p> <p>In the period April 2012 to March 2013, one appeal decision cited Policy 3 'Newport Local Centre' and five cited Policy 7 'Countryside', giving a total of six decisions citing policies within this group. Of the six, one appeal was allowed for the conversion of double garage and store to an annex, this decision cited Policy 7. In this case, the Inspector considered that the proposal did not constitute the creation of a separate dwelling in the countryside and did not consider that it would be harmful to the appearance and character of the area.</p> <p><b>Conclusion:</b> None of the above appeal decisions dispute the appropriateness of the policies for consideration in these decisions, nor their soundness. There does not seem to be a pattern emerging in which these policies are not supported by Inspectors. The allowed appeal was a result of differing judgement by the Inspector, rather than disagreeing with the policy itself.</p>			



## A. Special Qualities

### Key outcome


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

### Context

2.8 **Protected species:** The Authority needs to update its Supplementary Planning Guidance on Biodiversity and Planning (the current guidance pre-dates, in particular, the current Local Development Plan (2010), Technical Advice Note 5 (2009), and the Natural Environment and Rural Communities Act 2006). This requires programming when resources are available.


2.9 **Seascape Character:** With the benefit of funding from the Planning Improvement Fund and Natural Resources Wales the authority has published for consultation supplementary planning guidance on Seascape Character.<sup>6</sup> Closing date for comment is the 1<sup>st</sup> November 2013.

### Policy Performance

Policy Area	Indicator 5	Target	Information source
Policy 8 (Strategy Policy)	Approvals contrary to Strategy Policy 8 Special Qualities. Approvals contrary to Recommendation.	0 approvals	
<p><b>Trigger:</b> 2 developments permitted contrary to any criterion in any one year.</p> <p><b>Reason:</b> The Special Qualities are central to National Park Purposes set out in the Environment Act 1995.</p> <p><b>Analysis:</b> In the period 1<sup>st</sup> April 2012 to 31<sup>st</sup> March 2013, there were three proposals approved contrary to recommendation which referred to Policy 8. This has increased by two from the previous annual monitoring report period.</p> <p>The first of the three approvals was for the change of use from horticultural uses to commercial vehicle parking and storage compound. The reasons given for the approval were as follows:</p> <ul style="list-style-type: none"> <li>• The proposed use of land as a storage compound was little different from its use for the storage of gravel in the past;</li> <li>• Its use would not affect the sensitive environment of the National Park;</li> <li>• The site was not in an unsustainable countryside location, in fact it was believed that the proposals would enhance the area;</li> <li>• The proximity of other commercial properties;</li> </ul>			

<sup>6</sup> <http://www.pembrokeshirecoast.org.uk/default.asp?PID=188>

Policy Area	Indicator 5	Target	Information source
			<ul style="list-style-type: none"> <li>• Sufficient visual screening could be required;</li> <li>• The development would secure removal of storage units from residential driveways elsewhere in the area which were currently used by the applicants.</li> </ul> <p>The second approval was for the use of land as storage compound for building materials and equipment and siting of storage container. The reasons given for the approval were as follows:</p> <ul style="list-style-type: none"> <li>• planning history of quarry/storage use;</li> <li>• the economic and social wellbeing of the local community;</li> <li>• the visual intrusion was trivial and would not damage the special qualities of the National Park.</li> </ul> <p>The third approval was for the lifting of an occupancy restriction to enable the disposal/sale of units at Newport Golf Club. The reasons for approval were as follows:</p> <ul style="list-style-type: none"> <li>• compliance with Policy 1 of the Local Development Plan that there would be no negative impact as this was an existing development;</li> <li>• Members also considered that while the agreement continued to serve a useful purpose, it would serve that purpose equally well if it had effect subject to the modifications approved.</li> </ul> <p><b>Conclusion:</b> There were 3 approvals contrary to Policy 8 one more than the trigger for requiring further analysis. The trigger for this Policy is low given the primacy in legislation of National Park purposes. Development Management Committee view differed to the views of Officers of the Authority and did not consider that there was a detrimental impact on special qualities with these developments and explained why. Previous Annual Monitoring Reports (2011 and 2012) did not highlight this trigger being activated. Longer term monitoring over the Plan period is required as these 3 decisions in 1 year do not indicate concern over implementation of the Policy.</p>

Policy Area	Indicator 6	Target	Performance
	Effectiveness of Policies (Policy 1 and Policies 8 to 18) & Supplementary Planning Guidance (Landscape Character, Regionally Important Geodiversity Sites and Historic Environment) when dealing with Applications at Appeals.	Inspector does not raise issues regarding the effectiveness of the policies or supporting supplementary planning guidance.	
<b>Analysis:</b> In the period April 12 to March 13, three appeal decisions cited Policy 1 "National			

Park Purposes and Duty', seven cited Policy 8 'Special Qualities', one cited Policy 14 'Protection of Buildings of Local Importance' and eleven cited Policy 15 'Conservation of the Pembrokeshire Coast National Park'. A total of twelve appeal decisions cited policies within this section. Five of these appeals were allowed.

**Conclusion:** None of the above appeal decisions dispute the appropriateness of the policies for consideration in these decisions, nor their soundness. There does not seem to be a pattern emerging in which these policies are not supported by Inspectors. Of the five appeals allowed, four related to design considerations, where the Inspector's judgement differed to the Authority's. One appeal was allowed as a result of the fall back position of a subsequent approval for an amended scheme by the Authority, the Inspector agreed that the appealed scheme would be detrimental to the character and appearance of the area but found no significant improvement in the approved scheme and thus did not dismiss the appeal on design grounds.

## B. Major development, the potential for growth

### Key outcomes

- (1) No new major development in the National Park unless there are exceptional circumstances.<sup>7</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

2.10 **Minerals:** The Welsh Government has published the Mineral Resource Map of Wales in 2010. Guidance and maps for planning authorities in relation to safeguarding the minerals resources of Wales has been conducted by the British Geological Survey, published in October 2012 and is entitled 'Aggregates Safeguarding Maps of Wales'. It includes a map for South West Wales, which details the location and extent of mineral resources for the whole region and highlights those that should be safeguarded, it includes the recommended separation distances advised within Minerals Technical Advice Note 1 Aggregates.<sup>8</sup> In terms of its implications, the Authority's minerals safeguarding zones should be checked and updated accordingly on the planning application constraints layer and in the Local Development Plan at review.

2.11 The Regional Technical Statements (RTS) for both South and North Wales Regional Aggregate Working Parties (RAWP), which were completed in 2008 are currently undergoing their first review.<sup>9</sup> It is envisaged that the final publication of the new documents will be in March 2014. The implications of the South Wales Regional Technical Statement upon the Local Development Plan will need to be considered once published.

2.12 **Waste:** Welsh Government is proposing a series of changes to the current national planning policy and guidance in relation to waste and in doing so have gone out to consultation on draft revisions to Planning Policy Wales Chapter 12 (specifically paragraphs 12.5-12.7.2) and TAN 21 Waste.<sup>10</sup> Whilst the proposed changes impact largely at a regional and not local level is of most relevance to the Local Development Plan is the proposal to revoke the Regional Waste Plans (RWP). Within the South West Wales RWP 2008, National Parks are identified as "exclusion areas" when locating facilities that will serve more than one local Authority, which Local Development Plan Policy 27 'Local Waste Management Facilities' remains consistent with. The implications of the revised national policy upon the Local Development Plan, once published will need to be considered.

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<sup>7</sup> See *Planning Policy Wales, Edition 5, November 2012, paragraph 5.5.6; Minerals Planning Policy Wales, December 2000, paragraph 21, page 11; Minerals Technical Advice Note 1: Aggregates 2004, paragraph 52; Mineral Technical Advice Note (MTAN) Wales 2: Coal, paragraphs 74 to 79, page 159, South West Wales, Regional Waste Plan 1<sup>st</sup> Review (August 2008); Circular 125/77 Roads and Traffic – National Parks.*


<sup>8</sup> <http://www.bgs.ac.uk/mineralsuk/planning/resource.html>


<sup>9</sup> <http://wales.gov.uk/topics/planning/policy/dear-cpo-letters/regional-technical-statements-for-aggregates-review/?lang=en>

<sup>10</sup> <http://wales.gov.uk/consultations/planning/planning-for-waste/?status=closed&lang=en>

## Policy Performance

Policy Area	Indicator 7	Target	Performance
Major development	Approvals of proposals that engage Major Development Test	0 approval of major development unless exceptional circumstances are proven.	
<p><b>Trigger:</b> Approval of 1 major development where no exceptional circumstances are shown in any one year.</p> <p><b>Reason:</b> To ensure a consistent approach with first purpose and Planning Policy Wales Major development test.</p> <p><b>Analysis:</b> Between April 1<sup>st</sup> 2012 and March 31<sup>st</sup> 2013 no application for a major development was approved.</p> <p><b>Conclusion:</b> There are no issues arising regarding the policy framework of the Plan.</p>			

Policy Area	Indicator 8	Target	Performance
Minerals	Applications for minerals development	0 approval for new minerals development unless exceptional circumstances are proven.	
<p><b>Trigger:</b> 1 new or extended mineral site permitted when exceptional circumstances are not shown in any one year.</p> <p><b>Reason:</b> This would have a major impact on the minerals strategy. The trigger would not include borrow pits.</p> <p><b>Analysis:</b> There has been no approvals between April 12 to March 13 for a new or extended mineral site.</p> <p><b>Conclusion:</b> There are no issues arising.</p>			

Policy Area	Indicator 9	Target	Performance
	Effectiveness of Policies (Policies 19 to 28) & Supplementary 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 12 to March 13 no Inspectorate appeal decisions refer to these policies or relevant supplementary planning guidance in their decision making.

**Conclusion:** No conclusion about effectiveness can be made.

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

### Key outcomes

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

### Context

2.13 **Sustainable Design:** A forthcoming contextual change to monitor is the effect of Welsh Government's changes to Building Regulations Wales upon the national planning policy on sustainable buildings. The Building Regulations were devolved to the Welsh Government on the 31<sup>st</sup> December 2011, revisions to Part L (Conservation of fuel and Power) were published in February 2013.<sup>14</sup>

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

2.15 **Sustainable Energy:** The Marine Renewable Energy Strategic Framework (MRESF) project March 2011<sup>15</sup> has investigated the potential marine renewable energy resource of Welsh Territorial Waters (TWs) and considered potential scenarios for the sustainable development of that resource primarily as an aid to policy development and also an indicator of resource for potential developers. To follow on from the Marine Renewable Energy Strategic Framework ([MRESF](#)), the Welsh Government commissioned the Marine Renewable Infrastructure Study. This involves preparation of a number of options for marine energy development and particularly the associated marine infrastructure that needs to be provided to support energy developers.<sup>16</sup>

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

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

<sup>13</sup> 'Vulnerable developments' are defined in the Technical Advice Note 15: Development and Flood Risk on flooding, please see Figure 2 page 7: weblink

[http://new.wales.gov.uk/docrepos/40382/epc/planning/403821/40382/403821/\(560\)\\_july04-tan15-e.pdf?lang=en](http://new.wales.gov.uk/docrepos/40382/epc/planning/403821/40382/403821/(560)_july04-tan15-e.pdf?lang=en)

<sup>14</sup> <http://www.planningportal.gov.uk/buildingregulations/approveddocuments/partl/>

<sup>15</sup> <http://mresf.rpsgroup.com/>

<sup>16</sup> <http://www.marineenergypembrokeshire.co.uk/about/research/welsh-marine-renewable-infrastructure-study>

2.16 A report from Regeneris Consulting and the Welsh Economy Research Unit at Cardiff Business School has recently been published that highlights the potential economic benefits of marine energy to Wales, entitled 'The Economic Impact of the Development Of Marine Energy in Wales'. The report estimates that if development is increased significantly over the next 20 years – with the capacity to generate 1GW of power – it could contribute a total of £840m to Welsh Gross Value Added during the development and installation stages. Once operational this installed capacity would bring in an additional £20m Gross Value Added and support 440 FTE jobs across Wales each year.<sup>17</sup>

2.17 Whilst not impacting directly upon the Local Development Plan, the above positive movements indicate that the Authority may experience more proposals for on shore infrastructure in relation to marine energy developments in the future. Of particular interest will be the outcomes from Grid connection studies to investigate required grid upgrades to each of the primary resource areas (Pembrokeshire is one such area) and the selection of land fall sites and any development of onshore infrastructure projects to support developer-led marine renewable energy installations within the identified primary resource areas.

2.18 <sup>18</sup>Supplementary Planning Guidance on Renewable Energy was adopted in October 2011. An addendum on field array panels was adopted in June 2012. Draft Supplementary Planning Guidance on the Cumulative Impact of Wind Turbines is being consulted upon. Consultation ends 1<sup>st</sup> November 2013. This guidance was brought forward with the help of the Welsh Government's Planning Improvement Fund.<sup>19</sup> The Authority's Supplementary Planning Guidance on Sustainable Design is currently being updated (minor update). The consultation ends 1<sup>st</sup> November 2013.

## Policy Performance

Policy Area		Indicator 10	Target	Performance
Sustainable Design Policy 29		Incorporation of renewable energy technology within scheme	Relevant schemes incorporating renewable energy technologies.	N/A

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


Policy Area		Indicator 11	Target	Performance



<sup>17</sup> <http://wales.gov.uk/newsroom/businessandconomy/2013/7723909/?lang=en>

<sup>18</sup> Page 7, Marine Energy Infrastructure Study, Stage B – Final Report, Halcrow, Welsh Government December 2012

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




Policy Area		Indicator 11	Target	Performance
Sustainable Design Policy 29		Compliance with code for sustainable homes <sup>20</sup>	Target - 100% meeting national policy requirements	
<p><b>Trigger:</b> failure to achieve across 100% of residential developments</p> <p><b>Reason:</b> Requirement of Planning Policy Wales Technical Advice Note 22: Planning for Sustainable Buildings.</p> <p><b>Analysis:</b> Permissions granted between April 2012 and March 2013 complied with the Planning Policy Wales requirements (paragraph 4.12.4).</p> <p><b>Conclusion:</b> There are no issues arising.</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			(Target - Planning permissions to contribute to an overall Renewable Heat Target for the National Park of 26 GWh.)	
<p>No triggers have been identified for the above. There are two main difficulties with monitoring renewable energy provision. Firstly renewable energy generated from micro household renewable schemes and small scale 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.</p> <p>Nevertheless the Authority will continue to monitor the provision where permission is required. Some estimates are necessary where information is lacking.</p> <p><b>Analysis:</b> Electricity Generation Gwh (estimate) equals an estimated 3.40 Gwh if all the permissions granted since 2006 are implemented. The proposals are primarily for wind turbines and photovoltaics.</p>				

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


Policy Area	Indicator 12a	Target	Performance
			<p>Heat Generation Per Annum Gwh (estimate) equals an estimated 3.17 Gwh primarily from solar panels.</p> <p>The approach to Plan policy preparation was to ensure that the Authority was encouraging and supportive of renewables unless there are overriding environmental or amenity issues. An analysis of approvals versus refusals shows that since 2006 there have been an estimated 22 refusals of permission and 141 approvals for various types of renewable energy.</p> <p><b>Conclusion:</b> Even though permitted development rights mean that all proposals cannot be counted the Plan is ahead of potential target on electricity generation (if all those with permission are assumed to have been constructed) but significantly behind on heat generation. The sum of estimated contributions from solar thermal, biomass and heat pumps have formulated the above heat generation target. Permitted development rights for these technologies were extended for both domestic and commercial properties in June and October 2012 respectfully (excluding air source heat pumps for commercial properties)<sup>21 22</sup>, after which the Authority has experienced a dramatic fall in the number of applications for such technologies.</p> <p>However, in respect of non domestic buildings, flues which serve biomass installations with an output of more than 45kw, or on buildings that already have an existing flue (thus causing more than one flue on one building) are not covered by the rights. Within the Authority's Renewable Energy Assessment<sup>23</sup>, medium scale biomass installations are classed as those serving schools, offices, leisure facilities etc and would generally be greater than 45kw installations, ranging from 50kw installations for small offices to 300kw installations for leisure complexes within the National Park. Of the non-domestic properties which are estimated to require greater than 45kw biomass installations to provide suitable heat power (if this technology was to be installed), it is estimated that the potential contribution from medium scale biomass installations within the National Park, that would require planning permission would be 26 GWh of heat generation. Indicator 12b has been amended to reflect this.</p>

Policy Area	Indicator 12c	Target	Performance
Renewable Energy Policy 33	Renewable Energy Supplementary Planning Guidance	All decision making is consistent with the Authority's Renewable Energy Supplementary Planning Guidance	
<p><b>Trigger:</b> 3 or more decisions contrary to the principles set out within the Renewable Energy supplementary planning guidance.</p> <p><b>Reason:</b> Although the contribution provided by renewables is important it is difficult to monitor (see below). A more meaningful measure is how effective the Renewable Energy Supplementary Planning Guidance will be (to be adopted October 2011) in providing a supportive context for renewables provision while protecting the special qualities of the National Park. Deciding applications contrary to this in principle support set out in the Supplementary Planning Guidance</p>			

<sup>21</sup> [The Town and Country Planning \(General Permitted Development\) \(Amendment\) \(Wales\) Order 2012 Schedule 2 Part 40 "installation of domestic microgeneration equipment".](#)


<sup>22</sup> [The Town and Country Planning \(General Permitted Development\) \(Amendment\) \(Wales\) \(No.2\) Order 2012, Schedule 2, Part 43 "installation of non-domestic microgeneration equipment".](#)

Policy Area		Indicator 12c	Target	Performance
should trigger a review.				
<p><b>Analysis:</b> A review of permissions granted and refused for renewable energy schemes during the monitoring period (April 1<sup>st</sup> 2012 and March 31<sup>st</sup> 2013) shows that there have been an estimated 8 refusals of permission and 21 approvals. This has included 10 approvals for solar PV or hot water panels with no refusals, 7 approvals and 8 refusals for wind turbines and 4 approvals for ground or air source heat pumps. All of these have been in line with policy and the Supplementary Planning Guidance (for applications made after adoption in October 2011).</p> <p><b>Conclusion:</b> The policy context and supplementary planning guidance continues to provide a positive framework for renewable energy generation. The refusals of permission for the wind turbines related to overriding landscape concerns and in some cases a lack of information to fully consider all material planning considerations.</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 year) would fail the tests set out above.	
<p><b>Trigger:</b> 1 development permitted contrary to policy 34.</p> <p><b>Reason:</b> Can be severe consequences of inappropriate development. This is a Welsh Government indicator.</p> <p><b>Analysis:</b> All applications within areas identified by Technical Advice Note 15 or Shoreline Management Plan 2 as having potential for flooding have been screened by Natural Resources Wales (formerly the Environment Agency). All applications permitted within these areas relate to replacement dwellings, extensions to dwellings where the residential use is already established or are for developments permitted within the requirements of Technical Advice Note 15. No proposals have been permitted contrary to Policy 34 of the Plan.</p> <p><b>Conclusion:</b> The policy context set out in Technical Advice Note 15 and the Local Development Plan is providing an appropriate framework to minimise the future risk of flooding.</p>				

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

Policy Area	Indicator 14	Target	Performance
<p><b>Analysis:</b> For formal review stage.</p> <p><b>Conclusion:</b> For formal review stage.</p>			

Policy Area	Indicator 15	Target	Performance
	Effectiveness of Policies (Policy 29 to 34) & Supplementary Planning Guidance (Sustainable Design Guidance, Renewable Energy) at Appeals and when dealing with Applications	Inspector does not raise issues regarding the effectiveness of the policies or supporting supplementary planning guidance.	
<p><b>Analysis:</b> In the period April 12 to March 13, eleven appeal decisions cited policies within this group. Of the eleven, two decisions cited Policy 29 'Sustainable Design' and eleven decisions cited Policy 30 'Amenity'. Seven appeals were allowed where the Inspector either did not consider that the proposals in question would cause harm to the appearance and character of the area or differed from the Authority's judgement over the impact upon amenity, or in some cases both. One appeal, which was allowed, referred to the former Building Extensions SPG, the Inspector did not agree with the Authority's approach in securing energy efficiency improvements in this regard. However, this Supplementary Planning Guidance has since been withdrawn in September 2012 and no longer forms a material planning consideration, please see paragraph 2.19 of the Annual Monitoring Report 2012 for further information.</p> <p><b>Conclusion:</b> None of the above appeal decisions have questioned the content of the policies, although Inspectors have differed with the Authority in their consideration of them, in certain decisions. Where this is the case, officers should note the Inspectors' judgements and take them into account when dealing with future applications that raise similar design and amenity considerations.</p>			

## D. Visitor economy, employment and rural diversification

### Key outcomes

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

### Context

2.19 **Dale Airfield:** Dale Airfield occupies an extremely important and prominent site within the Pembrokeshire Coast National Park and has recently been purchased by several different owners. The site provides a number of concerns but also possibilities. An appraisal of the site has been undertaken and the policy context of the Local Development Plan is sufficient to consider proposals coming forward on the site.

2.20 **Rural Development:** The previous Technical Advice Note 6 was used to draft the Local Development Plan This new Note provides new guidance on the need for Development Plans to define '**local need**' taking into account the social, economic and environmental characteristics of the area. This has been addressed through the preparation of the Authority's Accessibility Supplementary Planning Guidance.<sup>23</sup>


2.21 **Recreation:** Paragraph 4.156 of the Local Development Plan advises that supplementary planning guidance will be provided to guide recreational activities in the National Park. Supplementary planning guidance was adopted by the National Park Authority in December 2012.<sup>24</sup> It provides additional advice on which recreational activities are likely to be considered appropriate for different locations within the National Park.


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<sup>23</sup> <http://www.pembrokeshirecoast.org.uk/default.asp?PID=183>


<sup>24</sup> <http://www.pembrokeshirecoast.org.uk/default.asp?PID=183>

## Policy Performance

Policy Area		Indicator 17	Target	Performance
Policy 43		Loss of employment sites	0 approvals of loss of employment sites except where justified within the terms of the policy.	
<p><b>Trigger:</b> Loss of two or more employment sites or 500 sq metres contrary to recommendation</p> <p><b>Reason:</b> Small employment sites can make an important contribution to sustainable communities.</p> <p><b>Analysis:</b> No applications were approved contrary to this policy during the monitoring period.</p> <p><b>Conclusion:</b> There are no issues arising.</p>				

Policy Area		Indicator 18	Target	Performance
Visitor Accommodation Policy 35		Counts of hotel spaces, self catering, caravan and camping spaces (Hotels, self catering, caravan databases etc).	Maintain current levels of provision except where loss of hotel proven.	
<p><b>Trigger:</b> 1 or more developments contrary to recommendation in any one year.</p> <p><b>Reason:</b> The impact of such development changes on National Park purposes. There is a need to maintain current provision.</p> <p><b>Analysis:</b> No applications were approved contrary to this policy during the monitoring period. One application permitted the loss of a hotel which was proved to be no longer viable and that existing peak demand could continue to be met in the area. There was also one application to create a 10-bedroom hotel from a former school building.</p> <p><b>Conclusion:</b> There are no issues arising.</p>				

Policy Area		Indicator 19	Target	Performance
Special Qualities		Proposals for recreational activity contrary to Policy 8.	Target 0 approvals	
Policy 8				
<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.</p> <p><b>Conclusion:</b> Decisions made have consistent with policy.</p>				

Policy Area		Indicator 20	Target	Performance
		Effectiveness of Policies (Policy 35 to 43) & Supplementary Planning Guidance (Recreational Activities, Loss of Hotels) when dealing with Applications and at Appeals	Inspector does not raise issues regarding the effectiveness of the policies or supporting supplementary planning guidance.	
<p><b>Analysis:</b> In the period April 12 to March 13, one Inspectorate appeal decision referred to Policy 40 'Site Facilities on Ten, Chalet and Caravan Sites' and one cited Policy 42 'Employment Sites and Live Work units'. Giving a total of two appeal decisions citing policies within this group. The appeal decision which cited Policy 40 allowed the proposal for alterations and extension of an existing caravan site clubhouse. The Inspector differed from the Authority's judgement in relation to the impact upon the character of the surrounding area and saw no conflict with this policy as a result. The appeal decision which cited Policy 42 dismissed the proposal to convert a ground floor retail unit to residential within Newport Retail Centre, as defined within the Local Development Plan. The Inspector agreed with the Authority's application of this policy in this case. No concerns were raised by the Inspector in relation to the content of the above mentioned policies.</p> <p><b>Conclusion:</b> Whilst this provides limited indication, Policies 40 and 42 appear to be effective.</p>				

## E. Affordable housing and housing growth

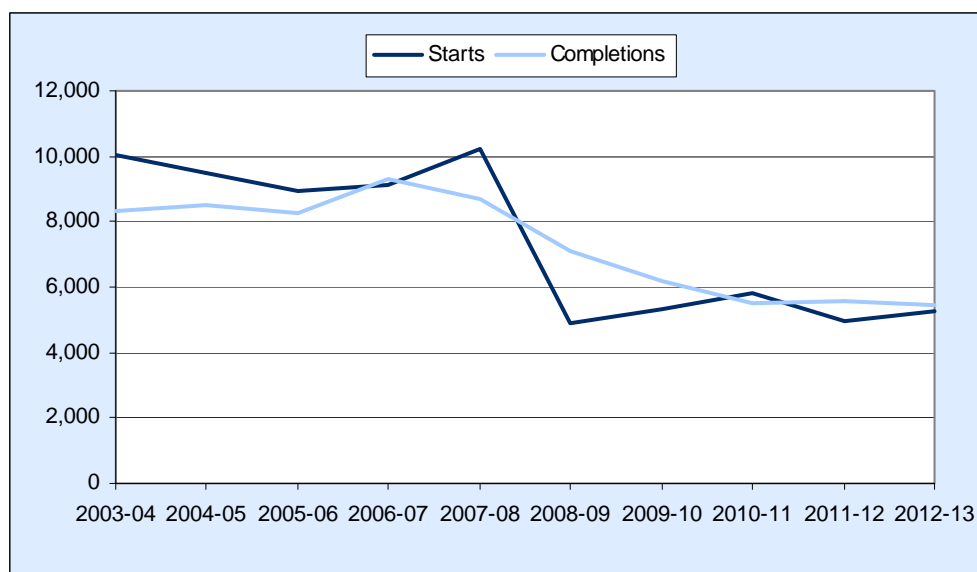
### Key outcomes

- (1) An estimated 1,600 new dwellings are provided of which a minimum of 530 new affordable homes are provided.
- (2) If by the end of the financial year 2014/15 the number of affordable homes built or under construction is below 80% of the proportion of the overall target for the Plan period which should be available by that date, the Authority will immediately commence a review of the Affordable Housing Strategy Policy.
- (3) A higher density of development is achieved – a minimum of 30 dwellings to the hectare in the Local Development Plan's Centres<sup>25</sup>.

### Context

2.24 **Housing Market:** Prior to 2007-08, both housing starts and completions were relatively stable in Wales, with between nine and ten thousand starts a year and around eight thousand homes completed. It is noticeable that as the country was hit by an economic downturn the number of starts fell steeply; dropping to an all time low of 4,910 starts in 2008-09. It can also be seen that there has been a reduction in the number of planning applications being submitted and the number being granted planning permission over recent years.<sup>26</sup>

#### Number of new dwellings started and completed annually in Wales



Source: New house building collection from local authorities & NHBC

2.25 Recent reports would suggest that housing market may be becoming more buoyant. The nature of the housing market over the lifespan of the Local Development Plan is and will be the subject of much conjecture and conflicting forecasts.

2.26 **Viability:** When the Local Development Plan was considered for Examination (2010)

<sup>25</sup> See Glossary of Terms

<sup>26</sup> [New House Building in Wales, January to March 2013](#) First Release, Statistics for Wales



the assumptions made for testing viability were considered by the Inspector. The table below provides an update position for this Annual Monitoring Report. The updated position would suggest that the no change to affordable housing policy is required.

March 2010 Housing Background Paper	2012 Update
<p>Market prices at end of 2007/ beginning of 2008 with an analysis of impact of different market prices for 90%, 80% and 70%.</p> <p>The Inspector commented <i>'this base date turned out to represent more or less the peak of house prices in the area and I am satisfied from the evidence produced at the hearings that the subsequent decline has been about 13%, within the parameters of the investigations.'</i></p>	<p>Current house prices in the National Park are 91% of 2007 price). A slight improvement on house prices from when the Plan was considered by the Inspector at the Local Development Plan Examination.</p>
<p>Social Housing Grant is likely to be needed for an estimated 65 units and it is likely that the smaller sites for 2 dwellings will also need support. If all 250 units of windfall sites were on developments of 2 units then this would mean an additional 125 units are likely to need Social Housing Grant over the Plan period. This account for funding an estimated 13 social housing units in the National Park per annum over a 15 year Plan period.</p>	<p>The Housing Associations and the County Council advise that given design requirements in the National Park, along with the cost of plot purchase, that more affordable housing can be produced outside the National Park than inside.</p> <p>Investment in the National Park has not been ruled out though and it is proposed to amend the Authority's supplementary planning guidance to include reference to the Authority's willingness to negotiate on less costly but equally acceptable design solutions. Recent examples of where this has been done can be included.</p>
<p>BREEAM Ecohomes 'excellent' standard.</p>	<p>Now using the Code for Sustainable Homes Level 3. No change in impact on costs.</p>
<p>Planning obligation contribution of £11,365 on each market dwelling in the potential development (emerging draft supplementary planning guidance for the Joint Unitary Development Plan figure)</p>	<p>No change. As per the Local Development Plan's Supplementary Planning on Planning Obligations.</p>

2.27 **Affordable Housing Scrutiny Review Committee:** The National Park Authority has undertaken a review of affordable housing delivery in the National Park. The Committee's recommendations are being considered by the National Park Authority on the same day as this Annual Monitoring Report.<sup>27</sup> The commentary and conclusions in

<sup>27</sup> [Insert hyperlink to Committee Papers for Affordable Housing Scrutiny Committee Report when ready.](#)


this section reflects the evidence provided to the Committee. With the benefit of Planning Improvement Funding from Welsh Government consultants have been invited to bid to carry out the following work by end of March 2014:

- a. A revised supplementary planning guidance on affordable housing for the National Park ready for public consultation.
- b. The product of a revised viability appraisal of sites allocated in the Authority's Local Development Plan communicated to landowners and relevant developers. This will take account of new information provided regarding the costs of providing infrastructure for the sites.
- c. To provide a report on expected current residual values being operated in Wales' planning authority areas and National Parks in England.
- d. Identified opportunities to streamline the planning application process where proposals include an element of affordable housing.
- e. To put in place partnership arrangements and an appropriate delivery vehicle to implement proposals on sites allocated in the Local Development Plan that are owned by Pembrokeshire County Council.
- f. In light of the above provide a report of findings on any implications for the Local Development Plan's next review.

2.28 **Water Supply:** Dwr Cymru has published both a second draft Water Resources Management Plan and its Asset Management Plan (AMP6) for 2015 – 2021. The draft Water Resources Management Plan highlights a possibility of water shortages for parts of the County. Solutions to this emerging problem are suggested within the Plan and are further referenced in the draft AMP6 Plan. Dwr Cymru has not advised of any water shortage issues during the Plan Period and this is not listed as a constraint to any of the sites allocated in the Plan. It will, however require continual liaison, particularly as we move towards the later years of the Plan period.

2.29 **Low Impact Development:** The Authority has adopted an updated Low Impact Making a Positive Contribution Supplementary Planning Guidance to take account of newly published Welsh Government policy and guidance.<sup>28</sup> There are no implications arising for Policy 47 Low Impact Development Making a Positive Contribution.

## Policy Performance

Policy Area		Indicator 21	Target	Performance
Housing	W	The housing land supply taken from the current Housing Land Availability Study (TAN1)	Minimum 5 years supply.	Actions to improve delivery 
<b>Trigger:</b> Less than a 5 year supply in any one year.				
<b>Reason:</b> It is important to deliver the affordable housing strategy.				
<b>Analysis:</b> The Authority is required to demonstrate a five year effectively available housing land supply. The 2012 study was submitted to the Welsh Government in November 2012. The report				

<sup>28</sup> [Pembrokeshire Coast National Park - SPG](#)

uses the residual method to calculate the land supply and concludes that the National Park has a 3.5 year land supply. The housing land supply for 2012-2011 was 3.8 years.

The tables below provide a summary of how sites are progressing against the timetabling proposed in the Local Development Plan and provides a summary of what are the main issues to be addressed in bringing sites forward. Appendix 2 identifies the main issues that need to be addressed to help bring individual sites allocated in the Local Development Plan forward for development.

**Trajectories for Local Development Plan Site Delivery (housing or part housing)**

	Number of Sites	Number of Residential Units	% of Total Units
<b>As per Plan timetable</b>	17	453	49%
<b>Minor delay</b>	10	396	43%
<b>Significant delay</b>	4	69	8%
<b>Totals</b>	31	918 <sup>29</sup>	100%

**Key issues to address (a site may have more than one issue to address)**

	Number of Sites with this issue.
Water/Sewerage	11
Concerns regarding Affordable Housing Requirement	6
Land owner intentions unknown	6
Highways	2
Existing Use	2
Land stability	1

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

- e) **Approving planning applications for housing developments**, provided all relevant policy considerations are met. This is shown through the 5 year land supply figures. Of the total dwellings included in the 2012 5 year land supply, 66% are on sites allocated in the Local Development Plan. The remaining 44% of dwellings are on land with planning permission (and not allocated in the Local Development Plan), including 12% on sites of less than 5 units. This clearly demonstrates that the Authority is continuing to approve applications for


<sup>29</sup> Excludes live work units.

residential development beyond that allocated in the Local Development Plan.

- f) The Authority is **continuing to liaise with land owners**. Since the beginning of 2013 the Authority has had direct contact with landowners of 14 (of 31) of the sites allocated in the Plan (that include housing) who have indicated an intention to bring their land forward for development in the short to medium term. This has been informed by the Land Allocation Delivery Study carried out for the Authority.
- g) The Authority has reviewed the potential for release of the limited **land in its ownership**. Please see the Authority's Annual Monitoring Report 2012 for further information.
- h) Officers in anticipation of the outcomes of the current affordable housing **Scrutiny Review Committee** is also commissioning work which should assist in bringing sites forward – see Context section above for more detail.
- i) As a result of the Scrutiny Review Committee into affordable housing delivery a **change in perception campaign** to ensure the Authority's approach to negotiating affordable housing is understood is also being programmed.

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


**Conclusion:** The current consultant's commission (to report April 2014) will firstly seek to assist in bringing sites allocated in the Local Development Plan (that include affordable housing) forward and secondly to assist in inform any requirement for a review of the housing land allocations in the Plan.

Policy Area		Indicator 22	Target	Performance
Policy 32	W	The number of net additional affordable and general market dwellings built. (TAN 2)	530 affordable dwellings over the plan period.  1000 general market dwellings built. In total an annual completion rate of 90 per annum.	Actions are proposed to improve delivery  
<p><b>Trigger:</b> If by the end of the financial year 2014/15 the number of affordable homes built or under construction is below 80% of the proportion of the overall target for the Plan period which should be available by that date, the Authority will immediately commence a review of the Affordable Housing Strategy Policy.</p> <p><b>Reason:</b> Milestone contained in the Inspector's report on the Local Development Plan.</p> <p><b>Analysis:</b> As this element of the Plan is a key component of the Plan a commentary is provided here on progress to date.</p> <p>The target for affordable housing delivery in the Local Development Plan is 530 affordable houses over the Plan period with 80% of the provision planned for delivery by the end of the financial year 2014/2015 to be either built or under construction. This would mean that an estimated 228 affordable dwellings would need to have been built between 2007 and 2015 or be under construction. This would be an estimated 28 affordable dwellings to be completed annually to achieve the Plan's target provision.</p> <p>Between 2007 and 2013 a total of 289 houses have been completed of which 8% (21) are</p>				

Policy Area	Indicator 22	Target	Performance	
affordable. A total of 195 houses are under construction of which 16% (32) are affordable units.				
The table below provides further breakdown.				
	Target Annual Completions	Completions Recorded	Target Annual Affordable Completions or u/c	Affordable Completions or u/c recorded
2007-2008	90	106	28	0
2008-2009	90	80	28	14
2009-2010	90	39	28	7
2010-2011	90	26	28	0
2011-2012	90	26	28	0
2012-2013	90	12	28	32
Total	540	289	168	53
<p>On single plots an affordable housing contribution is payable to assist with providing for affordable housing provision.. A phased introduction, meant that from October 1st 2011 the contribution was £100 per square metre. This rose to £150 on October 1st 2012 and from October 1st 2013 it will be £250. This element of affordable housing provision was intended as a minor part of the affordable housing provision for the Plan period. As at September 2013 10 planning permissions include a requirement for an affordable housing contribution. The affordable housing contribution was introduced from the 1<sup>st</sup> October 2011. Given the recent economic climate for house building and the need for viability testing of these proposals this is considered to be a reasonable return.</p> <p><b>Conclusion:</b> The Authority's Local Development Plan affordable housing policy, Policy 45, is not fully achieving its key outcome in terms of the number of affordable homes anticipated as being built or under construction by the end of the financial year 2014/15 targets. The evidence shows that the delivery of affordable housing is currently falling short of the authority's targets. This is reflective of the general downturn in the housing market over previous years, however, key actions have been identified (See context for this section above and actions under Indicator 21 above to seek to improve delivery and to inform Local Development Plan review).</p>				


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

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

Policy Area		Indicator 24	Target	Performance
Policy 44	W	Average density of housing development permitted on allocated development plan sites. <sup>30</sup>	30 per hectare target in the Plan Centres achieved.	
<p><b>Trigger:</b> 2 or more housing developments not achieving 30 dwellings to the hectare.</p> <p>Reason: To make the best use of available land.</p> <p><b>Analysis:</b> Two applications within Centres for 2 or more dwellings were approved during the monitoring period, both using brownfield land. One site was a mixed retail/residential development in Saundersfoot which has a density above 30 per hectare. The residential units are flats.</p> <p>The second site was a certificate of lawfulness for a former motel at New Hedges to be used as 10 dwellings. The density in this instance is marginally less than 30 per hectare but was dependent on the original density of building at the site.</p> <p><b>Conclusion:</b> No pattern is emerging to cause concern.</p>				

Policy Area		Indicator 25	Target	Performance

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

Policy Area	Indicator 25	Target	Performance
	Effectiveness of Policies (Policy 44 to 47) & Supplementary Planning Guidance (Affordable Housing, Low Impact Development making a Positive Contribution) when dealing with Applications and at Appeals	Inspector does not raise issues regarding the effectiveness of the policies or supporting supplementary planning guidance.	
<p><b>Analysis:</b> In the period April 12 to March 13 three Inspector's decisions refer to Policy 45 'Affordable Housing', one of which was allowed. In this appeal the Inspector did not agree that there was a net gain of residential units and thus concluded that no affordable housing provision was required. This was a result of differing judgement on the previous lawful use of the buildings in question.</p> <p>One appeal decision cited Policy 47 'Low Impact Making a Positive Contribution', the appeal was found to conflict with this policy and was subsequently dismissed.</p> <p><b>Conclusion:</b> Inspectors have not challenged the content of Policy 45 or the Authority's Affordable Housing SPG, which outlines the Authority's approach in securing affordable housing provision through the planning system. Whilst this provides a limited indication, Policy 45 and its supporting SPG appears to be affective. The Inspector did not challenge the criteria or application of Policy 47 in assessing low impact proposals. Since the above mentioned decision, the Authority has adopted revised Supplementary Planning Guidance on Low Impact Development (June 2013), this Supplementary Planning Guidance can also be included in future monitoring of policy performance.</p>			

## F. Community Facilities, Retailing and Transport

### Key outcomes

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

### Context

2.27 **Community Infrastructure Levy:** Community Infrastructure Regulations provide a transitional period after which planning obligations designed to collect pooled contributions from 5 or more developments may not be used to provide infrastructure which could be funded from Community Infrastructure Levy, or on the local adoption of the levy if this is before the end of the transitional period. Analysis shows that this threshold has not been reached to date. In the longer term the preparation of a Community Infrastructure Levy will be heavily dependent on the County Council as the primary service provider. Raising awareness and liaising with the Council will be essential. Local Planning Authorities can continue to pool such contributions until 6th April 2014.

2.28 **Retailing:** The recent National Retail Barometer study indicates that retail vacancy rates across the UK have fallen for the first time in 18 months. The current UK average vacant floorspace in town and city centres is 12.4%, the vacant units are at 16.1%.<sup>31</sup> The Department for Local Government and Communities has recently released a consultation document, which seeks to change the permitted development rights for the change of use of properties outside of prime retail locations. The proposals reflect the advice of the [Portas Review](#), which recommended more flexibility for change of use, and would help the high street, rural communities and local retailers by increasing footfall and spending.<sup>32</sup> A future Local Development Plan Annual Monitoring Report will need to consider the significance of any amendments to national planning policy and revisions to the Local Development Plan as appropriate.


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<sup>31</sup> <http://www.colliers.com/en-gb/uk/insights/property-news/2013/0816-national-retail-barometer>


<sup>32</sup> <https://www.gov.uk/government/consultations/greater-flexibilities-for-change-of-use>




## Policy Performance

Policy Area		Indicator 26	Target	Performance
Community Facilities Policy 48		Number of approvals for loss of community facilities	0 unless justified by policy framework	
<p><b>Trigger:</b> 1 or more community facilities lost contrary to recommendation.</p> <p><b>Reason:</b> Communities facilities are important to community sustainability.</p> <p><b>Analysis:</b> No applications determined between 1<sup>st</sup> April 2012 and 31<sup>th</sup> March 2013 linked to Policy 48 resulted in a community facility being lost contrary to recommendation.</p> <p>Commentary is provided on sites allocated for community facilities in Appendix 2.</p> <p><b>Conclusion:</b> No need to review.</p>				

Policy Area		Indicator 27	Target	Performance
Community Facilities Policy 48		Number of Planning Obligations for community facilities secured from development. (or financial contributions)	S106 agreements secured in line with Supplementary Planning Guidance	
<p><b>Trigger:</b> More than 2 applications decided contrary to the recommendation.</p> <p><b>Reason:</b> To secure improvement in community facility provision.</p> <p><b>Analysis:</b> There has been 1 application decided contrary to recommendation during the monitoring period.</p> <p><b>Conclusion:</b> There are no issues arising as the trigger has not been met.</p>				

Policy Area		Indicator 28	Target	Performance
	W	Amount of greenfield and open space lost to development (ha) which is not allocated in the plan.	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> Twenty-eight applications were approved which included the development of greenfield land during the monitoring period This amounted to the development of 4.4ha of greenfield land.</p> <p>Of the 28 applications:</p> <ul style="list-style-type: none"> <li>• 4 were for agricultural buildings on existing farms;</li> <li>• 6 were for wind turbines;</li> <li>• 4 were for polytunnels;</li> <li>• 5 were for developments linked to horses (stables, sand schools and an access track for trekking);</li> <li>• 2 were for extensions of domestic gardens;</li> <li>• 1 was for a solar farm;</li> <li>• 1 for a storage building;</li> <li>• 1 for a hardstanding area around existing outside storage buildings;</li> <li>• 1 was for a certificate of lawfulness for an extension to a camping site;</li> <li>• 1 was for a workshop/chicken shed; and</li> <li>• 1 was for a dwelling (rounding off, in line with Policy 7 of the LDP)</li> </ul> <p><b>Conclusion:</b> These applications were approved in accordance with the Local Development Plan policies and the target has therefore been met during this monitoring period.</p>			


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

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


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

**Conclusion:** No issues arising.


Policy Area		Indicator 30	Target	Performance
Retail Policy 48		Percentage of vacant retail floor space.	No greater than 10%.	
<p><b>Trigger:</b> Greater than 10% vacant A use class floorspace within retail centres for 2 consecutive years.</p> <p><b>Reason:</b> Vacancy in centres naturally fluctuates and allows for new ventures to come forward. Sustained relatively high vacancy for National Park centres should be assessed further.</p> <p><b>Analysis:</b> Across the centres of Tenby, Saundersfoot, St Davids, Solva and Newport, and for all A use class units, the average vacant floorspace is 5.04% at 2013. This is below the UK average of 12.4%<sup>33</sup>. A break down of vacant floorspace percentage by centre is as follows, Newport 1.9%, Saundersfoot 3.7%, St Davids 7.6%, Solva 8.4% and Tenby 4.8%.</p> <p><b>Conclusion:</b> No issues arise regarding vacancy rates in the National Park's retail centres.</p>				

Policy Area		Indicator 31	Target	Performance
Transport Policy 52		Approvals for development without providing appropriate access for vehicles, cyclists and pedestrians.	0	
<p><b>Trigger:</b> 1 or more developments approved contrary to Policy 52 recommendation in any one year.</p> <p><b>Reason:</b> These are essential for developments to go ahead.</p> <p><b>Analysis:</b> There have been no developments given planning permission without providing appropriate access for vehicles, cyclists and pedestrians.</p> <p><b>Conclusion:</b> There are no issues arising.</p>				

<sup>33</sup> <http://www.colliers.com/en-gb/uk/insights/property-news/2013/0816-national-retail-barometer>

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

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

Policy Area		Indicator 34	Target	Performance
		Effectiveness of Policies (Policy 48 to 56) & Supplementary Planning Guidance (Planning Obligations) when dealing with Appeals	No issues arise from any appeal decisions regarding the effectiveness of the Plan's policies.	
<p><b>Analysis :</b> In the period April 12 to March 13, one appeal decision cited Policy 50 'Town and District Shopping Centres</p> <p>The appeal related to the change of use of a ground floor retail unit to residential within Newport Retail Centre. The Inspector raised no concerns over the content or application of</p>				

Policy 50 and found the proposal to conflict with it.

**Conclusion:** Whilst limited evidence is available, Policy 50 appears to be effective.

### 3. Sustainability Appraisal Monitoring

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

Objective Number	Sustainability Objective
1	<p><b>Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.</b></p> <p>Labour Force Survey (2008) suggested that the medium trend (since 2001) for employment rates in agriculture, forestry and fishing in Pembrokeshire is increasing; the most recent data release by Stats Wales (2011) supports this observation.</p> <p>In 2011 Pembrokeshire County Council released “The State of Wildlife in Pembrokeshire”, there have been no further updates to this report to inform this 2013 Monitoring Report. The report suggested that biodiversity associated with agriculture is generally in decline (though there are some improvements in arable habitats).</p> <p>Overall the information available suggests that the trend for growth in the agricultural sector that has been experienced in the past may have been to the detriment of biodiversity. However, there is evidence to suggest that within the National Park the condition of biodiversity features on agricultural land may be more favourable due to many long term management agreements with farmers/ landowners as well as the significant land holdings of the National Trust and Ministry of Defence.</p>
2	<p><b>Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.</b></p> <p>Progress towards this objective within the context of the Local Development Plan will be the result of maintaining or improving community facilities, and refusing planning applications for residential development in remote areas or areas with poor community infrastructure. Three proposals for residential development in a remote location were approved during this monitoring period contrary to Policy 7 of the LDP, these applications were recommend for refusal on the basis of accessibility as they were located at a distance exceeding 1Km from public transport provision. One of these applications was granted permission on the basis that it would provide affordable housing and the remaining two on the basis that they would support the tourism industry in rural communities, and were only 300 yards beyond the 1Km distance from public transport.</p> <p>Achievement of this Sustainability Objective will depend largely on activity outside the Local Development Plan. Commentary for Sustainability Appraisal Objective 13 indicates that generally community facilities are being retained and enhanced. Additionally PCNPA have developed Supplementary Planning Guidance on Accessibility, adopted summer 2013, which sets out how the authority considers the accessibility of certain proposals in countryside locations including e.g. isolated groups of dwellings. This SPG, should make positive contributions to the SA Objective during subsequent monitoring periods.</p>
3	<p><b>Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology)</b></p>

Objective Number	Sustainability Objective
	<p><b>with reference to the special qualities of the National Park.</b></p> <p>Tranquillity mapping carried out by the Countryside Council for Wales in 1997 and 2009 suggests that the National Park is becoming a more disturbed place, largely due to increased impact of road traffic. There have been no updates to this data during this monitoring period for comparison.</p> <p>Redevelopments of the Royal Gate House in Tenby, the Cambrian Hotel and Coppett Hall in Saundersfoot have begun and should make positive contributions to the townscape of the south east coast of Pembrokeshire.</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. Work on Supplementary Planning Guidance on Seascapes has commenced during this monitoring period and this guidance will be adopted during the next monitoring period.</p> <p>The impact of renewable energy projects on the landscape is being considered through Renewable Energy Supplementary Planning Guidance, produced in 2011, and a supplement to this document that concerns field scale photovoltaic developments. In addition the Development of Supplementary Planning Guidance on the Cumulative Impact of Wind Turbines has commenced and this guidance will be adopted during the next monitoring period.</p> <p>In December 2012 PCNPA also produced Supplementary Planning Guidance on Recreation and Leisure, this SPG aims to protect the special qualities of the National Park by defining which sorts of attractions and activities are appropriate in which locations.</p> <p>Additionally on-going work in partnership with Pembrokeshire County Council and Carmarthenshire County Council to record and map planning applications for renewable energy schemes, particularly, wind turbines, are well under-way and can be evidenced from the interactive wind turbine map now available on the authority's website.</p> <p>Long term concerns about changes in landscape quality are part of the rationale of this objective, application of the Local Development Plan and projects outside the planning process suggest positive progress towards this objective.</p>
4	<p><b>Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.</b></p> <p>The role of the Local Development Plan in meeting this objective is likely to be restricted to its role in determining applications proposing development to support such activity, and securing planning obligations to develop cycleways or footpaths. Policy 52 requires new development to include appropriate access for walkers and cyclists.</p> <p>No developments have received planning approval without providing</p>

Objective Number	Sustainability Objective
	appropriate access for cyclists and pedestrians during this monitoring period indicating that the LDP is contributing positively to this SA Objective.
5	<p><b>Increase the number of visitors using the National Park outside the peak visitor season.</b></p> <p>Progress in this Sustainability Appraisal Objective is largely dependent on activities beyond the influence of the Local Development Plan i.e. an increase in visitor numbers out of season is more likely to come about as a result of the marketing strategies employed by the tourism sector. However, the Local Development Plan may assist in increasing and improving visitor accommodation through planning approvals. The goals of the visitor economy policies (creating accommodation suited to year round use, whilst not increasing the overall provision) will help to do this.</p> <p>Approvals for self-catering accommodation since adoption of the plan help meet the aim to improve the suitability of accommodation for year round use, though they also increase the overall provision. Therefore the planning contribution to this Sustainability Objective can be seen as mixed. During this monitoring period 11 approvals for one or more self-catering holiday lets were given.</p>
6	<p><b>Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.</b></p> <p>The Local Development Plan will contribute towards this objective primarily by not adding to the amount of infrastructure at risk from fluvial/ coastal flooding. No planning permissions to create new infrastructure in areas predicted to be effected by sea level rise of up to two metres were approved during this monitoring period (1st April 2012 – 31st March 2013)</p>
7	<p><b>Reduce factors contributing to climate change.</b></p> <p>Emissions of greenhouse gases resulting from activities within the National Park that could be influenced by the Local Development Plan are centred on domestic, commercial and road transport. Local authority estimates by the Department for Energy and Climate Change (DECC) for Pembrokeshire (2005-2009) (Released 15/09/2011) suggest that per capita rates of CO2 for Industrial/ Commercial, Domestic and Transport remained consistent between 2005 and 2009 with a slight increase in Industrial/commercial emissions between 2008 and 2009. The latest estimates for 2011 from DECC (whole UK, release March 2012) suggest that CO2 emissions for industrial/commercial and residential sectors have decreased between 2010 and 2011, with the greatest decrease in the domestic sector (22%). Transport emissions have remained steady since 1990, however, they are currently thought to be at lowest since 1992. It is likely that the reduction in residential emissions was due to the warmer winter experienced in 2011 (2.1 degrees Celsius and 4.1 degrees Celsius for the first and last quarters of the year compared to 2010), which reduced the need for energy for heating. Additionally, some reductions in CO2 emissions may be due to the current economic situation, reduced development and various businesses activities, along with rising energy costs.</p> <p>The Code for Sustainable Homes (and the Welsh Government additional requirement for energy efficiency) should lead to energy efficiency improvements in new builds within the National Park. Policy 29 has had to be</p>



Objective Number	Sustainability Objective
	<p>reviewed (see Chapter 2 C). This will limit the positive impact that can be made under this objective. The increasing number of proposals for renewable energy schemes that have been approved since adoption of the Local Development Plan will help reduce domestic and commercial CO<sub>2</sub> emissions.</p> <p>Progress towards this Sustainability Objective is being made, and is likely to accelerate with increasing adoption of renewable technologies and improvements to the housing stock. During the monitoring period, 22 renewable energy schemes have received planning approval with many more awaiting a planning decision.</p>
8	<p><b>Maximise the contribution of the limited opportunities for development to sustaining local communities.</b></p> <p>Provision of affordable housing within the National Park has been stalled by current market/economic conditions and is currently falling short of the target set out in the Local Development Plan (See the analysis under indicator 22 for details).</p> <p>No employment land was lost during the monitoring period, and not new employment land has come forward.</p> <p>The overall effect on the SA Objective is positive, whilst some progress has been stalled by economic conditions; the LDP is still contributing affordable housing provision.</p>
9	<p><b>Encourage access for all to the National Park, reflecting the social mix of society.</b></p> <p>Meeting this objective is likely to be the result of efforts outside the application of the Local Development Plan. Policy 39 may lead to the conversion of cheaper forms of accommodation to more expensive forms, which would not help in meeting this objective. During the monitoring period (April 1st 2012 and March 31st 2013) no application linked to this policy was approved or refused.</p>
10	<p><b>Maintain the cultural distinctiveness of communities.</b></p> <p>This Sustainability Objective covers the breadth of aspects that contribute to the unique character and cultural distinctiveness of the National Park.</p> <p>Within the context of the Local Development Plan, achievements towards this objective will be twofold. Firstly the Local Development Plan will be able to contribute towards the objective by helping to ensure that people who grew up in the National Park are able to have the opportunity to continue living here once they are adults by sustaining local communities and enabling access to employment (see comments under SA Objective 8).</p> <p>Secondly, the Local Development Plan will be able to contribute to the objective by helping to maintain and enhance culturally significant built environment and natural environment features.</p> <p>In terms of maintaining listed buildings less than 10% (3.9%) are identified as being at any degree of risk. There seems to be significant potential for the</p>

Objective Number	Sustainability Objective
	uses of listed buildings to change – 1 list building permission for change of use was granted between April 1 <sup>st</sup> 2012 and March 31 <sup>st</sup> 2013.
11	<p><b>The adverse effects of minerals exploitation in the National Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.</b></p> <p>No new quarries or extensions to existing quarries have been approved during the monitoring period (April 1st 2012 and March 31st 2013). However, one new minerals application, to review mineral planning for Carew Quarry, has been submitted and is pending decision during the next monitoring period.</p>
12	<p><b>Reduce the negative impacts of waste.</b></p> <p>Active waste facilities in the National Park are limited to civic amenity sites in Tenby and near St Davids.</p> <p>The percentage of waste reused, recycled or composted across Pembrokeshire was 50.0% in 2011/12 (an increase of 1.1% on 2010/11), this figure is part of a consistent pattern of increasing levels of reuse, recycling and composting.</p> <p>Incidents of recorded fly-tipping in Pembrokeshire decreased between 13% between 2006/7 and 2010/11. However, the period of 2011/12 has seen an increase in the incidence of fly tipping of 13.4% (a return to 2006/7 levels).</p>
13	<p><b>Community facilities (including health &amp; social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population.</b></p> <p>Generally speaking community facilities are being retained where there is need, facilitated by the application of LDP Policy 48. However, three applications for change of use have been approved this year. All applicants were able to provide evidence that the facility was no longer needed. In addition a number of applications have been approved this year for the improvement of existing community facilities e.g. Regency Hall in Saundersfoot.</p>
14	<p><b>Maintain and enhance biodiversity both within and outside designated sites</b></p> <p>The State of Wildlife in Pembrokeshire report published in 2011 contains the following key observations:</p> <ul style="list-style-type: none"> <li>• Otter numbers and sites with threelobed water-crowfoot are increasing.</li> <li>• The condition of heathland and coastal cliffs and slopes has improved on selected sites.</li> <li>• Southern damselfly, skylark, yellowhammer and starlings are particularly under threat.</li> <li>• The condition of grassland and hedgebanks are generally declining in the wider environment.</li> <li>• The status of dormice and marsh fritillaries is unclear and further research is required.</li> </ul>

Objective Number	Sustainability Objective
	<p>These observations suggest that while there are success stories and areas of optimism, the condition of biodiversity in the area is cause for concern. The observations regarding grassland and hedgebanks is particularly relevant as these habitats comprise over half of the National Park area. Hedgebank decline is linked to landuse change, nutrient enrichment, chemical sprays, over-intensive management, and invasive non-native species. Grassland decline is associated with intensification and changes in grazing management. On a more positive note there is reason to believe that the long term decline of habitats associated with arable farming has been arrested and in recent years improvements have been seen.</p> <p>These observations cover the whole of Pembrokeshire, and it is possible that the situation in the National Park is better, due to the significant land holdings of the National Trust and Ministry of Defence along with the sustained efforts of the National Park Authority's Conservation and Delivery teams, who support or carry out conservation management on over 200 sites across the National Park.</p> <p>Within the scope of the Local Development Plan effects to biodiversity occur as the result of the loss of connectivity between habitats e.g. loss of hedgerows, or through the outright loss of habitats due to development pressure. All planning applications are tested for accordance with Local Development Plan Policy 11 'Protection of Biodiversity'. between April 1st 2012 and March 31st 2013. No developments have received planning approval that were not compatible with this policy. Additionally, at least one development has been approved that included biodiversity enhancements beyond any mitigation required.</p> <p>It is considered that the Local Development Plan is making positive contributions to the SA Objective.</p>
15	<p><b>Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.</b></p> <p>On-going discussions with Dwr Cymru continue to confirm that there are no concerns regarding the availability of water resources for existing developments or development proposed in the LDP . There is concern in that much of the sewerage infrastructure in the National Park is at or near capacity. Further information on this should come forward when the report on the deliverability of sites is prepared for the Authority.</p> <p>There are 11 blue flag beaches in the National Park in 2013 (one less than 2012), and a further 12 (13 in 2011) green coast award winning beaches (covering more remote, rural beaches).</p> <p>Supporting data for the Western Wales River Basin Management Plan<sup>34</sup> identifies 31 km of river and stream stretches in the National Park to be of a 'Good' overall status, 105.5 km to be of 'Moderate' overall status, and 8 km (the Nyfer river between Nant Duad and the coast, and the Ritec river (also</p>

<sup>34</sup> Environment Agency, <http://www.environment-agency.gov.uk/research/planning/125095.aspx>

Objective Number	Sustainability Objective
	outside the National Park)) to be of 'Poor' overall status. 0.12 km <sup>2</sup> of lake in the National Park is identified as of 'Good' overall quality (Rosebush reservoir) and 0.34 km <sup>2</sup> as of 'Moderate' overall quality (Bosherston Lily Ponds). No further updates to this data have been published to date.

## Appendix 1 Supplementary Planning Guidance








	Title	Status
1.	<b>Building Extensions</b>	WITHDRAWN - Adopted June 2011 Withdrawn in light of evidence regarding implementing this element of Policy 29. See analysis in the 2012 Annual Monitoring Report.
2.	<b>Loss of Hotels</b>	Adopted June 2011
3.	<b>Planning Obligations</b>	Adopted June 2011
4.	<b>Sustainable Design</b>	Adopted June 2011
5.	<b>Update to Sustainable Design (Draft)</b>	Consultation ends 1 <sup>st</sup> November 2013
6.	<b>Landscape</b>	Adopted June 2011
7.	<b>Seascapes (Draft)</b>	Consultation ends 1 <sup>st</sup> November 2013
8.	<b>Safeguarding Mineral Zones</b>	Adopted June 2011
9.	<b>Coal Works – Instability</b>	Adopted June 2011
10.	<b>Parking</b>	Adopted June 2011
11.	<b>Archaeology</b>	Adopted June 2011
12.	<b>Affordable Housing</b>	Adopted March 2011. Review to be completed March 2014. Formal consultation to follow.
13.	<b><del>Validation + Interim Statement</del></b>	WITHDRAWN - Adopted October 2009/Last update October 2011.  Withdrawn due to the publication of Welsh Government advice on validation in 2012.
14.	<b>Conservation Area Statements</b>	Adopted October 2011
15.	<b>Regionally Important Geodiversity Sites</b>	Adopted October 2011
16.	<b>Renewable Energy</b>	Adopted October 2011
17.	<b>Renewable Energy Addendum (dealing with Solar Arrays)</b>	Adopted June 2012
18.	<b>The Cumulative Impact of Wind Turbines (Draft)</b>	Consultation ends 1 <sup>st</sup> November 2013





	<b>Title</b>	<b>Status</b>
19.	<b>Shopfront Design</b>	Adopted October 2012
20.	<b>Low Impact Development Making a Positive Contribution</b>	Adopted June 2013
21.	<b>Recreational Activities</b>	Adopted December 2012
22.	<b>Siting and design of new farm buildings</b>	Adopted June 2012
23.	<b>Accessibility (advice on how proposals need to consider the availability of public transport)</b>	Adopted June 2013

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




## Appendix 2 Site Specific Monitoring






### Key



Site coming forward as per Plan timetable	
Minor delay in site coming forward	
Significant delay in site coming forward	
Water/sewerage issue to address	
Concerns regarding affordable housing requirement	
Land owner intentions unknown	
Highways issue to address	
Existing use on the site (relocation required)	Existing
Land stability	Stability

	Location Proposals Map ID	Site Name and Location	Number of Units	Phase 1 (2007 - 2011)	Phase 2 (2012 - 2017)	Phase 3 (2018 to 2021)	Current Trajectory	Issues	Notes/Action Points
1.	Broad Haven MA776	Land north east of Marine Road	35		35		-2018	 <b>Stability</b>	Landowner is commencing survey work on site.
2.	Broad Haven HA734	South of Driftwood Close	8		8		2015-2019		<p>Liaise regarding timing of Welsh Water improvement works.</p> <p>Landowner has contacted the Authority for advice regarding affordable housing.</p>
3.	Jameston HA730	Opposite Bush Terrace	35		20		Commence 2018	 	Landowner wants to deliver later in the Plan period.









	Location Proposals Map ID	Site Name and Location	Number of Units	Phase 1 (2007 - 2011)	Phase 2 (2012 - 2017)	Phase 3 (2018 to 2021)	Current Trajectory	Issues	Notes/Action Points
4.	Lawrenny HA559	Adj Home Farm	30	15	15	0		?	No pre-application discussions. Raise awareness under current proposed consultancy commission.
5.	Manorbier Station HA848	Field opp Manorbier VC School	19		9	10	Commence 2016		Landowner to consider feasibility of private sewerage arrangement. Landowner currently marketing the site.
6.	Manorbier Station MA895	Land part of Buttylands	15		8	7	Commence 2018	 Existing	Landowner to consider feasibility of private sewerage arrangement. Existing use on site requires relocation.
7.	New Hedges HA813	Rear of Cross Park	30		15	15	On Time 2016-2018		Negotiate affordable housing provision under current proposed consultancy commission – to complete by March 2014.. Pre-application discussions due to resume Autumn




	Location Proposals Map ID	Site Name and Location	Number of Units	Phase 1 (2007 - 2011)	Phase 2 (2012 - 2017)	Phase 3 (2018 to 2021)	Current Trajectory	Issues	Notes/Action Points
									2013.
8.	Solva HA384	Adj Bro Dawel	18		18	0	2016-2018		March 2015 for WWTW upgrading.
9.	Solva HA792	Bank House, Whitchurch Lane	12		12	0	2016-2018	 	March 2015 for WWTW upgrading.  Negotiate affordable housing provision under current proposed consultancy commission – to complete by March 2014.
10	St Davids HA737	West of Glasfryn Rd	90		30	60	Commence 2018	 	Feasibility study to upgrade Glasfryn Lane undertaken by Pembrokeshire County Council  Negotiate affordable housing provision under current proposed consultancy commission – to complete by March 2014.




	Location Proposals Map ID	Site Name and Location	Number of Units	Phase 1 (2007 - 2011)	Phase 2 (2012 - 2017)	Phase 3 (2018 to 2021)	Current Trajectory	Issues	Notes/Action Points
11	St Ishmaels MA733	Adj School	40		16		2013-2015		Upgrading of WWTW and easement or possible diversion of a sewer pipe.  Pre-application discussions ongoing.
12	Tenby HA377	Brynhir	168	30	90	48	Commence 2017		Landowner reluctant to bring land forward because of affordable housing requirement.  Negotiate affordable housing provision under current proposed consultancy.
13	Trefin HA738	North of Heol Crwys	15		10			?	No contact achieved with the landowner.

**Table 2 Allocations that are not phased in the Local Development Plan (that include affordable housing)**

	Location	Proposals Map ID	Site Name	Area Hectare	Residential Units	% Affordable Units	Affordable Housing Provision expected	Current Trajectory	Issues	Notes
1.	Tenby	HA723	former cottage Hospital Site	0.17	10	60	6	Commence 2015		Pre-application discussions ongoing.
2.	Tenby	HA724	Rectory Car Park	0.94	50	60	30	Commence 2019	 	PCNPA - liaise with landowner to bring forward site.
3.	Tenby	HA727	West of Narberth Road	1.14	25	60	15	Commence 2018		Owner intends to bring forward in the longer term.
4.	Tenby	HA752	Butts Field Car park, Tenby	0.94	80	60	48	Commence 2019		Issue of replacement car pa Landowner reluctant to bring land forward because of affordable housing requirement.
5.	Tenby	HA760	Reservoir Site, Tenby	0.33	12	60	7	Unknown		PCNPA to facilitate discussions with

	Location	Proposals Map ID	Site Name	Area Hectare	Residential Units	% Affordable Units	Affordable Housing Provision expected	Current Trajectory	Issues	Notes
										the owner of HA752
6.	Tenby	MA706	Upper Park Road, Tenby	0.01	4	60	2			Has a current planning permission.
7.	Tenby	MA707	White Lion St/Deer Park, Tenby	0.49	74	60	44	2013-2015		Has a current planning permission. Development commenced on site.
8.	Tenby	MA710	Sergeants Lane, Tenby	0.09	5	60	3	Commence 2019		No contact achieved with the landowners.
9.	Newport	HA825	North of Feidr Eglwys	1.50	20	70	14	Commence 2015		Pre-application discussions underway.
10	Saundersfoot	MA777	Rear of Cambrian Hotel, Saundersfoot	0.30	37	(current approval for 7 affordable/ renewal 60%)	7			Work on site has commenced.
11	St David's	HA385	North of Twr-y-Felin	0.92	13	(current permission for 0 affordable/ renewal 50%)				The site continues to be implemented.

	Location	Proposals Map ID	Site Name	Area Hectare	Residential Units	% Affordable Units	Affordable Housing Provision expected	Current Trajectory	Issues	Notes
12	St David's	HA789	Adj Ysgol Bro Dewi, Nun Street	0.56	10	50	5	Commence 2018		Landowners currently not interested in bringing this site forward.
13	Crymych	HA750	Depot Site	0.37	15	50	8			Decision note pending. Commencement anticipated late 2013.
14	Dale	HA382	Castle Way	0.55	12	80	10	2019-2021		Landowner reluctant to bring land forward because of affordable housing requirement.  Negotiate affordable housing provision under current proposed consultancy.
15	Dinas Cross	HA387	Opposite Bay View Terrace	0.25	12	100	12	2016-2019		Landowners currently not interested in bringing this site forward.

	Location	Proposals Map ID	Site Name	Area Hectare	Residential Units	% Affordable Units	Affordable Housing Provision expected	Current Trajectory	Issues	Notes
16	Herbrandston	HA732	East of Herbrandston Hall	0.38	12	50	6	Unknown	 	Arranging sewerage and water supply for the site is an issue in terms of deliverability. Landowner intentions unknown.
17	Jameston	HA436	North of Landway Farm	0.32	7	(current permission for 1 affordable/ renewal 50%)		2013-2015		Under construction.
18	Jameston	HA821	Green Grove	0.36	5	50	3	2015-2017		Arranging sewerage and water supply for the site is an issue in terms of deliverability

**Table 3 Allocations of Employment/Mixed Use Sites (not including affordable housing)**

Location/ Proposals Map ID	Site Name	Proposed Use	Monitoring
Newport MA232	Land adjacent to the Business Park, Feidr Pen y Bont	Mixed (Live/Work Units)	Not implemented. Planning permission granted in May 2009 for a new factory unit on proportion of this land.

Location/ Proposals Map ID	Site Name	Proposed Use	Monitoring
St David's EA748	South of St Davids Assemblies	Employment B1, B8, Local Waste Management Facility	Not implemented.
St David's MA746	Between Glasfryn Road and Millard Park, St Davids	Mixed (Live/Work Units)	Not implemented.

**Table 4 Community Facilities**

Site Ref	Site Name & Location	Use	Monitoring
CP829	Land at Saundersfoot Railway Station, Pentlepoir	Car park	Some pre application discussions have taken place. No further update for the 2013 Annual Monitoring Report.
CP828	Manorbier Station	Car park	Application NP/13/82 granted for 5 parking spaces; 1 disabled space, cycle parking and directional signs.



**Table 5 Road & Cycle Schemes**

Scheme Number	Road/Cycle Schemes	Monitoring
RI1	New House Bridge Improvement A4075	Not implemented. No progress to date.
RI2	Shared Use Path south of Carew Castle	Design will involve a displacement of the carriageway to the east to create sufficient space for the path within highway limits on the west side. Work is programmed to start on site in November 2013.
RI3	St Petrox Bends Improvement	Not implemented. Possibility of piecemeal improvements using road safety funding. No progress to date.
RI4	Fan Road/B4316 Junction Improvement, Saundersfoot	Not implemented. No progress to date.
RI5	Gumfreston to Tenby Phase 3	Funding available but tidal modelling by consultant required as road subject to inundation. Consideration being given to providing advance automatic flood warning signs in place of complex major improvement. Final scope of work being sought and agreed.
RI6	Glasfryn Lane, St Davids	Not implemented. Pembrokeshire County Council have undertaken a preparatory design works study in 2013 and are bidding for further funding to develop the scheme further in 2013/14. £27,000 Regional Transport Plan funding allocated in 2013/14 to develop design.

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

