

REPORT OF THE HEAD OF PARK DIRECTION

SUBJECT: LOCAL DEVELOPMENT PLAN REVIEW REPORT AND DELIVERY AGREEMENT

Purpose of the report

1. To ask Members to approve two documents, the Review Report and the Delivery Agreement. Drafts of the documents were appended to the National Park Authority March Committee Papers. Proposed amendments are attached to this Report. The Delivery Agreement will be submitted to Welsh Government for approval. Both documents have been subject to engagement and an eight week consultation.
2. Appendix 1 and 4 set out the comments received on each document and the actions proposed. Appendix 2 and 5 includes extracts from both documents showing the changes proposed. Appendix 3 provides additional information on individual sites.

Background

3. The Local Development Plan revision process has been underway for some time. Below is a summary of engagement to date.

Table 1: Overview of engagement with others to date

Who?	How?
National Park Authority Members	<ul style="list-style-type: none"> ▪ Scrutiny Committee outcomes on specific topics ▪ Series of Local Development Plan topic-based workshops ▪ Opportunity to comment on draft Review Report
Pembrokeshire County Council	<ul style="list-style-type: none"> ▪ Direct contact with relevant officers¹ for factual updates ▪ Officer meetings ▪ Peer review of evidence base ▪ Opportunity to comment on draft Review Report
Affordable Housing Working Group	<ul style="list-style-type: none"> ▪ Officer meetings with Housing Associations & Housing Authority ▪ Opportunity to comment on proposed areas of change identified in the Review Report
Natural Resources Wales	<ul style="list-style-type: none"> ▪ Direct contact with relevant officers for factual updates ▪ Officer meetings ▪ Technical review of evidence base

¹ This includes Officers with responsibilities for: Development Planning, Highway Authority, Economic Development, Housing, Drainage and Coastal Defences, Community Facilities, Waste.

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

4. Both documents have been consulted upon for 8 weeks. A public notice and press release were placed in a local newspaper. Members have had an opportunity to consider the feedback on the Delivery Agreement and Review Report at their recent workshop on the 25th of May.
5. Appendix 1 and 4 sets out the comments received and Officers' proposed responses. Additional issues raised include:
 - Concern over the implications of Member debate, possible deferment and requests for extensions to consultation deadlines on the overall timetable and whether enough time had been built in to compensate for this.

Response: Officers have included a series of workshops to ensure that issues can be debated early on. Statutory consultees and key stakeholders, including Town and Community Councils, will be notified well in advance of key consultation stages in the process. Documents will also be made available two weeks before statutory consultation periods commence. Planning Aid Wales have assisted in the running of workshops and associated information packs to raise awareness of the process.

- In light of the limited resources available, temporary assistance could be sought from the private sector during busy periods:

Response: The Authority has a budget available to assist with Local Development Plan revision and this is being used as suggested when needed.

- The Inspectorate has 12 months to issue the Inspector's Report from Local Development Plan submission and that Examination formally starts upon submission. Uncertainty was also raised on the timings of the Sustainability Appraisal Report and Post Adoption Statement, during the adoption stage.
- **Response:** The Delivery Agreement timetable has been amended accordingly.
- The publication of the Initial Consultation Report should be as soon as reasonably practicable in accordance with the Welsh Government Local Development Plan Manual (2015) paragraph 6.6.1.

Response: The Delivery Agreement timetable has been amended accordingly.

- The need to focus on deliverability of sites rather than past completion rates.

Response: The Review Report has been amended.

- To advise what were the number of completions on housing allocations in the Local Development Plan.

Response: The Review Report has been amended.

Financial considerations

6. Local Development Plan review has been budgeted for by the Authority. It is a statutory requirement to complete.

Risk considerations

7. Progressing Local Development Plan review is a statutory requirement. The approach outlined in the Authority's Delivery Agreement will ensure that a substantial amount of engagement is undertaken. Welsh Government regulations and guidance do not require formal consultation be undertaken on these documents and leave local planning authorities to consult to suit the local context.

Equality considerations

8. The Public Equality Duty requires the Authority to have due regard to the need to eliminate discrimination, promote equality of opportunity and foster good

relation between different communities. This means that, in the formative stages of our policies, procedure, practice or guidelines, the Authority needs to take into account what impact its decisions will have on people who are protected under the Equality Act 2010 (people who share a protected characteristic of age, sex, race, disability, sexual orientation, gender reassignment, pregnancy and maternity, and religion or belief). This work is being taken forward as part of the sustainability appraisal on the Local Development Plan and by the preparation of an Equalities Impact Assessment during Plan preparation.

Welsh Language considerations

9. The publication and consultation exercises were carried out in accordance with the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards Regulations (No.1) 2015.
10. Assessing impacts on the Welsh language is also an integral part of the Sustainability Appraisal process.

Human Rights considerations

11. The planning system seeks to progress legitimate aims by managing the development and use of land in the public interest to contribute to achieving sustainable development. It reconciles the needs of development and conservation, securing economy, efficiency and amenity in the use of land, and protecting natural resources and the historic environment. Human rights under Articles 1 (right to peaceful enjoyment to property), 8 (right to respect for the home, private and family life) and 14 (right to equality), are the most relevant ones. Proportionality means that the measure which interferes with the right must strike a fair balance between the aim and the right which it interferes with. The process for Local Development Plan preparation and the rigorous assessment procedures will support this approach.

Next Steps

12. It is proposed that both documents, subject to the changes shown in Appendix 2 and 5, are approved by Members.
13. The Delivery Agreement will be submitted to Welsh Government. Following agreement, the Authority must publicise it and notify all the specific consultation bodies, and such of the general consultation bodies as the Authority considers appropriate, that the Delivery Agreement has been revised. (Regulations 9(4A)&(5), & 10(2)). The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 – (*“the LDP Regulations”*)².
14. The Review Report when formally approved by the Authority, will be published on our web-site, sent to the Welsh Government and copies made available as

² As amended, including by The Town and Planning (Local Development Plan) (Wales) (Amendment) Regulations 2015 (*“the 2015 Amendment Regulations”*)

soon as practicable after approval; key evidence upon which the Report is based is publicly available. The Report will be part of the documentation required at the subsequent pre-deposit stage. This will ensure that early engagement opportunities enable any dissenting views on the scope of a proposed revision to be expressed and considered by the Authority early in the process. It is also required as part of the deposit documentation and the submission package.

15. Officers also intend to publish an easy read guide for the Delivery Agreement.
16. A report of consultations for each exercise will also be published and those who commented advised of how their comments were dealt with. All those on the Authority's mailing list will be advised regarding the availability of the documents and easy read guide once Welsh Government approval of the Delivery Agreement has been received.
17. The next stage will be to invite candidate sites submissions. Members have been provided a draft of the criteria and approach to comment on. The Authority will publish the criteria for site selection following approval by Members and invite site submissions. The submission period will be for 3 months starting in August 2016.

We are here

Stage	Main purpose
Review Report	<ul style="list-style-type: none"> • Identifies the parts of the Local Development Plan that need to be revised. • Publish background papers (evidence base) in support.
Delivery Agreement	<ul style="list-style-type: none"> • Timetable for producing the replacement Local Development Plan. • Community Involvement Scheme outlining the principles of community engagement.
Candidate Sites	<ul style="list-style-type: none"> • Publish criteria for site selection. • Invite site submissions.
Preferred Strategy	<ul style="list-style-type: none"> • Set out the key strategic policies for the Local Development Plan • Identify sites which fit with the Strategy
Deposit Plan	<ul style="list-style-type: none"> • Prepare and publish the detailed policies and proposals map.
Submission	<ul style="list-style-type: none"> • Submit the Plan and supporting evidence to the Planning Inspectorate.
Examination	<ul style="list-style-type: none"> • An independent Inspector assesses the soundness of the Plan.
Adoption	<ul style="list-style-type: none"> • The Authority adopts the Plan and uses it in making planning decisions.

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

RECOMMENDATION

- 1. That Members approve the Officer Responses to the representations received on the Review Report and Delivery Agreement.**
- 2. That Members approve the Review Report and the Delivery Agreement for the Pembrokeshire Coast National Park Replacement Local Development Plan subject to the amendments shown in Appendix 2 and 5.**
- 3. Authorisation is also sought to submit the Delivery Agreement for Welsh Government approval.**

Background papers:

[Pembrokeshire Coast National Park Local Development Plan, September 2010](#)

Local Development Plan Manual – Welsh Government

<http://gov.wales/topics/planning/policy/policy-and-guidance-on-development-plans/ldpmanual/?lang=en>

Local Development Plan Regulations

<http://www.legislation.gov.uk/wsi/2015/1598/contents/made>

Local Development Plan Background Papers

<http://www.pembrokeshirecoast.org.uk/default.asp?PID=754>

Planning Policy Wales (Edition 8, July 2016):

<http://wales.gov.uk/topics/planning/policy/ppw/?jsessionid=959D17CBE44B4C21C123285AA5AE6E99?lang=en>

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Representations on the Pembrokeshire Coast National Park Local
Development Plan Draft Review Report

Questionnaire

- Q1. Does the document give you a clear idea of what are the main areas of change? Yes/ No (please explain why)
 Q2. Are there important area of changes required that are not addressed? Yes/ No (please explain why)
 Q3. Additional Comments

Reference	Q	Representation/Answer	Officer Response
LDP2/4338/RR/1 Pembrokeshire Business Panel	1	Yes	
LDP2/4303/RR/1 Mr & Mrs P Hunt	1	Yes – A very thorough and inclusive approach to reviewing and formulating a replacement LDP is being adopted by the National Park. It is good to see that the background evidence is being reappraised to give up-to-date data and projections in terms of population, employment, housing and infrastructure. The background papers that feed into the LDP were useful to gain a clearer insight into the “bigger picture”. The Spatial Plan for People, Places and Developments in Wales provided important information about how Pembrokeshire fits into this plan.	Support noted.
LDP2/RR/2708/RR/5 Pembrokeshire County Council	1	Yes	Noted
SDP2/2916/RR/1 Tenby Town Council	1	Yes	Noted.
LDP2/3469/RR/6 National Trust Erddig Consultancy	1	Yes	Noted
LDP2/3643/RR/5 Mrs L Parker Manorbier	1	No. The sections about National Law and Local Development Plans seem to raise several complicated issues and refer to many background papers.	Concerns noted. The Authority is exploring opportunities to produce easy read versions of the main local development plan documents. At the workshop for Community Councils guidance was also given by Officers and the facilitator. Participants were also advised that If further assistance is needed Officers are also willing to advise further.
LDP2/3469/RR/1 National Trust Erddig Consultancy	2	No (main areas where change is required are addressed)	Noted.
LDP2/4338/RR/2 Pembrokeshire	2	Yes there are important areas not addressed in the Review Report.	See responses to issues raised under Question 3

Reference	Q	Representation/Answer	Officer Response
Business Panel			
LDP2/339/RR/1 S Bayes	2	<p>Yes The Officer Response to concerns expressed by Newport Area Environment Group (NAEG)</p> <p>about the soundness of LDP Policy 3 Newport Local Centre (Tier 3) Strategy Policy to the LDP 2012 AMR consultation process, Ref AMR/2012/001 to AMR/2012/2010 plus AMR/2012/2013, was as follows:- “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. 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” Further, as part of an informal pre-LDP Review/Revision/Replacement discussions, together with Newport Town Council, in November 2015, NAEG updated those concerns about LDP Policy 3 and presented them to Officers. Newport requires an in-depth study of its needs from the planning process over the next 15 years, and a reconsideration of strategy policy, which should be a specific part of the Review process. LDP Policy 3 is not even mentioned in the LDP Review Report</p>	<p>As advised previously the whole Plan is subject to review including Policy 3 for Newport along with the strategic policies for other Centres in the hierarchy.</p> <p>The Review Report sets where change is needed in principle and in many instances those changes will mean a need to look once again at various policies for the Centres (amongst other policies), for example changes in household projections will potentially affect all locations in the Plan and any other policy of the Plan that relies on household projections.</p> <p>These matters will have implications for Plan’s Centres policies and many other policies of the Plan.</p> <p>Listings of policies likely to need change were included in the first in house draft of the Review Report but it was considered to be too detailed by Welsh Government and would be potentially seen as presumptuous by the Authority as to how the Plan should change.</p>
LDP2/4303/RR/2 Mr & Mrs P Hunt	2	<p>Yes – At this stage it is not clear how the plan will achieve the correct balance of new business and employment opportunities, more housing and the necessary infrastructure needed to provide for these (additional public transport, extra healthcare, schools etc). It is hoped that the soundness testing you intend to apply will produce realistic and achievable targets for the new plan.</p> <p>Housing and new employment developments are two key areas that failed to meet the targets set in the 2007 plan. The reasons cited were a lack of landowners’ willingness to release their land for development and a lack of investors. This is a national problem that is still ongoing, with no signs of improvement expected in the current political and financial climate.</p>	<p>Comment noted.</p>

Reference	Q	Representation/Answer	Officer Response
		In situations where land has been brought forward for development it might be tempting for the National Park to go ahead with plans in order to meet their targets, rather than meet the actual needs of that location. This must not be allowed to happen. It is clear from supporting background papers that small scale developments should be spread equitably across the National Park, with any larger scale developments sited in the strategic hubs along the urban corridor linking the M4 and the area's ports.	
LDP2/2708/RR/1 Pembrokeshire County Council	2	No (main areas where change is required are addressed)	Noted.
LDP2/2897/RR/1	2	Yes	See Officer Response to the detailed comments received.
LDP2/2897/RR/2 Marloes & St Brides Community Council	2	<p>Table 7: Renewable Energy / 12a Capacity of renewable energy schemes permitted and completed</p> <p>While we understand the need to protect the natural beauty, wildlife and cultural heritage of the National Park, our Council disagrees with the PCNPA's policy of setting a target for renewable electricity generation within the National Park, and being satisfied when that target has been met.</p> <p>Firstly, by limiting planning permits to "fit" a target, as would appear to be the case, this makes it highly likely that many farmers and other landowners are prevented from diversifying into clean electricity generation, when such diversification might give their businesses the best chance of surviving economically in these difficult times.</p> <p>Secondly, local businesses and individuals who are involved in the installation and maintenance of renewable electricity generating equipment are losing out on business opportunities.</p> <p>Thirdly, this part of the world is blessed with very good renewable energy resources, and there is surely a moral obligation to allow their ever-increasing exploitation for the Common Good, in the light of ever sterner warnings about Climate Change.</p>	<p>The purpose of the target referred to is not to restrict renewable energy development if/when this potential contribution has been met.</p> <p>Planning Policy Wales paragraph 12.8.9 requires local authorities to consider the contribution their area can make and ensure development plan policies enable this contribution to be delivered. The targets therefore reflect the potential contribution within the National Park, based on the current technology available. The Authority's updated Renewable Energy Assessment, which forms part of the Review evidence base as a Background Paper, provides more information in this regard.</p> <p>Should the Authority be in a position where Indicator 12a has been met, the automatic refusal of subsequent planning applications on this basis alone would not be defensible or indeed desired.</p> <p>Conversely, should the Annual Monitoring Reports of the Local Development Plan identify that the target is not being met, this would not automatically justify planning approvals being granted for development proposals that raise other fundamental planning concerns.</p>
LDP2/2897/RR/3 Marloes & St Brides Community Council	2	Table 8: Performance for Visitor Economy, employment and rural diversification	The Authority has approved the vast majority of planning applications for business uses (85% in 2012/13 and 92% in 2013/14). There will inevitably be

Reference	Q	Representation/Answer	Officer Response
		<p>The report, with green-rated performance assessments in all four subcategories, implies that all is well in this sector; our Council wholeheartedly disagrees.</p> <p>With regard to Indicators 18 and 20, whilst the PCNPA policy is supposed to be “Maintaining current levels of holiday accommodation except where justification is proven”, we know of many situations where owners want to convert farm buildings which are no longer suitable for modern agricultural methods into long-term rented or modest open market housing units. However, Development Control will only grant planning permission for conversion into holiday lets, usually arguing that sites are too far from community centres.</p> <p>Whilst the PCNPA might say that half a mile is “too far away from the village” for a new dwelling, the County Council can rule that it is quite all right for children of school age to have to walk anything up to 3 miles from an existing dwelling, unaccompanied and in any weather, to meet the school bus.</p> <p>We are also aware of the PCNPA refusing permission for the conversion of surplus farm buildings into business starter units or light industrial units, whereas in similar situations in Cornwall, such applications would be looked upon favourably.</p>	<p>proposals that do not fit with the policy framework, or are inappropriate for other reasons and which are refused planning permission. No further detail is provided to respond to. Each authority is responsible for the production of the Development Plan and the management of development in its own area and whilst we would look at examples of good practice elsewhere as part of the Plan preparation process, it is necessary to develop bespoke policies for the area, based on a robust evidence base.</p> <p>The Authority’s conversion policy is being reviewed as part of Plan revision as is its approach to accessibility in the countryside. However, minimising the need to travel and aiming to ensure that there are alternative means of travelling are key strategic policy requirements of the Welsh Government that need to be taken account of in the drafting of policies for the countryside.</p> <p>The Community Council appears to be suggesting that it disagrees with the policy of Pembrokeshire County Council in not providing school transport under 3 miles from home. As a planning authority we cannot influence that policy which will have its own justification, probably related to logistics and costs. We can, however influence the location of new homes thereby taking best advantage of existing public transport networks and not exacerbating the need for lengthy and potential costly connections from home.</p> <p>The issues raised and responded to do not appear to relate to the indicators and targets monitored in Table 8 of the Review Report.</p>
LDP2/2897/RR/4 Marloes & St Brides Community Council	2	<p>Affordable Housing, and housing supply in general.</p> <p>Our Council believes that the PCNPA’s policy in this area needs to be completely re-thought; furthermore, its way of assessing the whole housing situation means that this report overlooks many important issues:-</p> <p>Page 18, Item 32: “Population forecasts in the Plan’s housing strategy indicate a slight decline in the number of people living in the park over the plan period.” Considering this together with the Population Profile shown on page 27 of the Draft Delivery Agreement, it is obvious that young locally-born people are leaving the</p>	<p>The tools available in planning policy are limited in terms of ensuring that new housing is occupied by younger people.</p> <p>New housing development only adds less than 1% to the total number of households in the National Park annually and there are greater macro-economic forces at play which are the primary dictators for the future of communities.</p> <p>Affordable housing can be occupied by any age group in need, similarly any age group can occupy market housing.</p> <p>The background to providing housing in the first Local Development Plan (in spite of what was seen as a declining</p>

Reference	Q	Representation/Answer	Officer Response
		<p>Park, and older people from outside the area are moving in. It could be argued that Park policy with regard to housing and industry is at least partially to blame.</p> <p>Furthermore, as the population is dropping and yet new houses are being built, this must mean that fewer and fewer houses are in permanent occupation. As the proportion of permanently-occupied residences falls in villages, it becomes harder for shops and schools to stay open and buses to run. People living in rural communities have always had to rely on each other for assistance during emergencies, family crises, bad weather, etc. but as the population ages, ever more houses stand empty most of the time. With more and more young people 'emigrating' out of Pembrokeshire how will these support systems be able to continue?</p> <p>We know that a certain proportion of second homes is inevitable, and acknowledge that some second home owners contribute a lot to Park communities. However, Park planning policy could have been said to accelerate the second home phenomenon by consistently granting permission, within villages, for large and opulent homes on relatively small plots: these are not "village houses" by any definition, nor can local people ever afford to buy them.</p> <p>We understand the need for market housing to be built to help fund affordable housing, etc. but if the market housing is all 'posh and big', i.e. way out of reach of locals, these inevitably are destined to be second homes. This only goes towards speeding up the decline of our villages.</p> <p>In the light of UK population trends, and for the sake of maintaining a vibrant and permanently viable society, we believe that Park communities like ours should be allowed to gently expand, with a healthy proportion of young families living in their own homes. We very much hope that in the light of the Well-Being Of Future Generations (Wales) Act 2015, the Park will very soon come round to our point of view.</p> <p>Crucial information which is missing</p>	<p>population) was to facilitate the delivery of affordable housing as the price of housing for those who wish to live locally continues to be seen as an issue to address.</p> <p>In terms of employment the Plan will need to be updated to reflect current national planning policy which provides a more enabling framework for economic development.</p> <p>This is currently being applied when the Authority deals with planning applications.</p> <p>In terms of approving larger properties the Authority does approve a range of property sizes. More information can be found on this in the Authority's background paper.</p> <p>Controls of dwelling size is possible where the dwelling is too large for the plot for example but seeking to control number of bedrooms would not be possible unless the Authority was considering the property's suitability as an affordable dwelling.</p> <p>The authority did seek to control the size of properties in an earlier Plan (to meet affordable housing needs) by removing permitted development rights from but this was not supported through Inquiry.</p> <p>Agree. Affordability/house prices is a key issue which is monitored and addressed in the Housing Background Paper, the Local Housing Market Assessment and will feed into the viability assessments preparation for the Plan.</p> <p>In terms of addressing affordable housing need the Authority as with all planning authorities must address the nature of need which is predominantly for rented accommodation. There are also issues with securing mortgages for Low Cost Home Ownership which would don't make them the most attractive option to achieve affordability in perpetuity. This is an even greater concern when an exceptions site is proposed.</p> <p>In terms of a shared ownership model that would work in Pembrokeshire the County Council has lead on discussions with the Housing Associations (the National Park Authority has been party to these discussions) to see if there is a model of shared ownership that could be</p>

Reference	Q	Representation/Answer	Officer Response
		<p>from any of the Park's documentation relates to freehold housing affordability. We are sure that if average house prices were graphed against average local wages, this would confirm that local freehold housing is becoming steadily further out of reach to locally-born people. Furthermore, the Park's own statistics confirm that there are a large proportion of self-employed people, who in any case find it difficult to obtain mortgages because of the way that their incomes fluctuate.</p> <p>We realise that the Park is obliged by central government to set Affordable Housing targets. However, we find it very depressing that the Park appears to consider that the only way of providing additional accommodation for people on lower incomes is to approve the construction of Affordable Housing for rent, when people aspire to own their own homes.</p> <p>Park policy says that when Affordable Housing is built on an exception site, none of the properties may be allocated for shared ownership, no matter how tight the conditions that would be imposed by the developer (typically a housing association). We think that this is very restrictive and closes off the most obvious route by which young families might start to establish themselves on the local property ladder. What is more, when families have an investment, no matter how small, in a property, they have every reason to look after it, be good neighbours and invest time and effort if not money in local community activities.</p> <p>There could be a lot more private rented accommodation in coastal communities, if only the Park could review its policy regarding the conversion of existing farm buildings. Even when the holiday rental provision is evidently saturated, the Park will insist that such buildings cannot be converted into permanent accommodation.</p> <p>Further to our comment earlier about the large proportion of self-employed people, relative to other areas of Wales: such people are self-reliant, ambitious, typically skill-rich, but relatively poor on paper. They might well be very interested in building their</p>	<p>operated in Pembrokeshire. The outcome of those discussions is awaited.</p> <p>The Authority's conversion policy is being reviewed as part of Plan review. However, if a property is suitable for conversion to market housing the Authority cannot control the nature of the occupation.</p> <p>Affordable housing under the current Local Development Plan is permitted throughout the National Park in conversion proposals.</p> <p>The Authority is willing to discuss Community Land Trust initiatives such as the one in St Davids currently underway.</p>

Reference	Q	Representation/Answer	Officer Response
		<p>own homes on leasehold plots provided by and managed by a Community Land Trust and yet nowhere in any of the Park planning documentation is there any reference that we have found to Community Land Trusts.</p> <p>A way forward that we would like to suggest is that at the earliest opportunity, the Park must speak to existing housing associations, and other interested bodies, etc. to investigate the feasibility of Community Land Trust developments as a way of providing lower-end freehold properties that are affordable to local families. Community Land Trust developments should be given equal status to Affordable Housing in all Parks documents which discuss future housing provision.</p>	
SDP2/2916/RR/2 Tenby Town Council	2	No	Noted.
LDP2/3445/RR/1 Newport Memorial Hall	2	There is a need for a community allocation for Newport for Newport Memorial Hall parking.	<p>The Authority will shortly be inviting Candidate Site submissions (August – November 2016). This presents an opportunity for such a site to be submitted to and considered by the Authority, for inclusion as an allocation in the replacement Local Development Plan.</p> <p>Deliverability will be a key issue to address when requesting an allocation.</p>
LDP2/3643/RR/1 Mrs L Parker Manorbier	2	Not sure.	Noted.
LDP2/2910/RR/1 St Davids City Council	3	<p>Extend the centre boundary to include the green space to the east of Ysgol Dewi Sant.</p> <p>Extend the centre boundary between the Fishguard and Haverfordwest main road to include land to the east of Glasfryn. Allocate the land for both Housing and Employment.</p> <p>The reason for the above is that the Council would like to see the plan include proposals that would help to stabilise the population and possibly see a modest increase, with more affordable housing available for local residents and more employment opportunities through business premises.</p>	Comments are noted. These are detailed matters which will need to be considered through the Local Development Plan Revision process.
LDP2/2910/RR/2 St Davids City Council	3	The Council would like to see more land become available for parking in St Davids.	Comments are noted. These are detailed matters which will need to be considered through the Local Development Plan Revision process.
LDP2/2910/RR/3 St Davids City Council	3	The Council would like to see St Justininas included in the LDP because of the commercial activity that	Comments are noted. These are detailed matters which will need to be considered through the Local

Reference	Q	Representation/Answer	Officer Response
		takes place there and would like the LDP to reflect the need for parking and permanent toilet facilities as the site develops.	Development Plan Revision process.
LDP2/2910/RR/4 St Davids City Council	3	The Council would like to retain areas or pockets of green space between the housing sites proposed on Glasfryn Road.	Comments are noted. These are detailed matters which will need to be considered through the Local Development Plan Revision process.
LDP2/2910/RR/5 St Davids City Council	3	The Council would not like to see development encroach the Cathedral Close or land extending from the west of it.	Comments are noted. These are detailed matters which will need to be considered through the Local Development Plan Revision process.
LDP2/1670/RR/1	3	<p>We have no additional comments to make from those submitted to you in our letter dated 26 February 2016, they are provided below for your convenience.</p> <ul style="list-style-type: none"> • All references to the Environment Agency (EAW), the Countryside Council for Wales (CCW) and the Forestry Commission (FC) should be changed to Natural Resources Wales (NRW). • All references to Planning Policy Wales should be updated. • Please consult with NRW on any Supplementary Planning Guidance which is required to be reviewed. • We have provided comments on existing LDP allocations (e-mail dated 25 February 2019). • We agree with the recommendations and proposed changes 	<p>Agreed.</p> <p>Agreed.</p> <p>Agreed.</p> <p>Noted. This information will be taken forward for the revision.</p> <p>Support noted.</p>
LDP2/4338/RR/ Pembrokeshire Business Panel	3	The prolonged timescale of the review process and the consequent potential for final policies to be out of date therefore there is a need for the LDP to be flexible enough so as to respond to changing circumstances.	Agreed. One of the key questions to test the Plan's soundness is 'Is the Plan sufficiently flexible?'
LDP2/4338/RR/3 Pembrokeshire Business Panel	3	The impact of second homes on housing allocations – to which the answer given at the meeting was that planning legislation does not distinguish between normal home and holiday homes and the issue may be addressable through the council tax system.	In addition further advice is provided in the Authority's Background Paper on previous efforts to introduce controls on occupancy for local needs.
LDP2/4338/RR/4 Pembrokeshire Business Panel	3	Development (mainly on caravan sites) going ahead without planning permission – which is covered in the report.	Noted
LDP2/4338/RR/5 Pembrokeshire Business Panel	3	The existing accessibility policies are inappropriate for rural parts of Wales such as in the PCNP. They are an imposition from an urban, centralised political perspective and do not serve the needs of the Pembrokeshire	Views are noted. As the policies of the Plan are reviewed they will be subject to the soundness tests which include testing against national planning policy considerations. The approach suggested here in principle is contrary to national

Reference	Q	Representation/Answer	Officer Response
		economy well. There needs to be a realisation that like it or not Pembrokeshire does and will continue to rely on the use of and access to the private car and the existing policies which prevent what would otherwise be acceptable developments in rural areas just because of the lack of frequent public transport are not acceptable and militate against a thriving rural economy.	<p>planning policy.</p> <p>It is intended that variety of policy options (including this type of one) and commentary in relation to the soundness tests and will be available for the Inspector's consideration. It is not one however that Officers could in principle recommend going forward.</p>
LDP2/4338/RR/7 Pembrokeshire Business Panel	3	It is also unclear as to whether and how the LDP will be able to take into account the likely strengthening of the NP's duty to take into account the needs of the economy to one of the core purposes. The need for and means of providing support for the economy within the NP should be clearly outlined in the LDP, underpinned by a clear and joint commitment to work with PCC in identifying and delivering to the needs of the economy.	<p>In terms of legislative changes the Authority's Plan as it develops cannot second guess likely outcomes. It must comply with current legislation, policy and guidance.</p> <p>Within that current framework the economy and issues relating to the economy have been given a more enabling planning framework which the Plan's revision will address.</p> <p>The Evidence Base Background Paper advise on the sensitives around the evidence base and this issue. <i>'This Authority is legally required to review its Plan. Regulation 41 of Section 69 of the 2004 Planning and Compensation Act requires a full review of the Plan every 4 years from initial adoption. Issues will also be monitored on an annual basis in the Local Development Plan Annual Monitoring Report which may trigger an earlier review.</i></p> <p><i>Any issues arising for the Local Development Plan review will have to be considered at the appropriate time. At present the 1995 Environment Act applies.'</i></p> <p>Officers continue to liaise with Pembrokeshire County Council as the economic development authority for the Authority. As with the previous Plan it is intended that that the Authority will submit a Statement of Joint Principles to the Examination with the County Council.</p> <p>This will be a statement of common ground.</p>
LDP2/4217/RR/1 Mr Fry	3	Would you please include a marina in Tenby?	The Enjoyment Background Paper refers to the Welsh Strategy for coastal tourism and acknowledges the economic benefit of marinas and ancillary facilities. It is recognises that they generally require support from residential development and that many locations in Wales are not suitable for the necessary significant marina-related housing development. Smaller scale proposals are identified – the only one in the

Reference	Q	Representation/Answer	Officer Response
			National Park is Saundersfoot which is listed as 'aspirational'. Marina development is a long-term strategy. Allocations included in the Local Development Plan are intended to be deliverable but there is no known support or funding available for a marina development in Tenby and so inclusion in the revised Plan would be purposeless and probably indefensible at Examination. Without significant additional robust evidence to demonstrate that need in Tenby, that it would meet the necessary environmental and wider conservation requirements and ultimately deliverability this cannot be included in the Local Development Plan.
LDP2/4217/RR/2 Mr Fry	3	Would you please include UPVC windows on the grounds of sustainability?	The local policy context for considering the detailed design of proposals mainly falls under Local Development Plan Policy 29 Sustainable Design. The use of UPVC windows is not precluded within the National Park and it is accepted that in certain cases they can offer a more sustainable alternative than a traditional timber window, with little difference in aesthetic appearance. The acceptability of UPVC windows would be based on a case by case basis dependant on site and building context. It is not for Local Development Plan Policy to prescribe certain design approaches over others. It should however set the parameters for design consideration in terms of ensuring development remains appropriate within its surrounding environment.
LDP2/4303/RR/3 Mr & Mrs P Hunt	3	<p>The National Park has a duty to ensure that the special qualities of this outstanding rural setting are protected. Insensitive developments should not be allowed to damage any areas of character. The LDP should resist development in visually prominent locations.</p> <p>Before the plan is ratified and adopted the three main areas of concern, should be addressed. Namely:</p> <ul style="list-style-type: none"> • Does the plan fit the needs and wishes of this area • Is it appropriate for this area • Is it deliverable in terms of resources and finance. 	<p>Concerns noted. The tests of soundness will mean that the Authority has to address these issues in principle namely:</p> <p>Is the Plan appropriate for the area in light of the evidence? ('Wishes' rather than clearly identified needs would not be addressed through however.)</p> <p>... and will the Plan deliver?</p>
LDP2/4338/RR/6 Pembrokeshire Business Panel	3	Affordable housing – the lack of which whilst it is covered in detail in the report is of concern to the business community which notes that the current policies have failed miserably as the targets set were completely unrealistic for most developments. Revisions of such	Noted.

Reference	Q	Representation/Answer	Officer Response
		policies in the LDP need to be realistic	
LDP2/4340/RR/1 Welsh Government	3	<p>In relation to your Review Report we are pleased with the amendments you have made in response to our previous comments.</p> <p>We commend the authority in undertaking consultation on the draft Review Report with stakeholders and the general public to enable views to be submitted on the proposed scope of the revision.</p>	Support noted for approach taken.
LDP2/4340/RR/2 Welsh Government	3	<p>WG are content with the Renewable Energy Assessment and the approach followed which takes account of the recently published update to the Renewable Energy Toolkit (September 2015).</p> <p>The only comment I have to make is that the LDP policy for renewable energy adopted in 2010 refers to small, medium and large scale renewable energy schemes and the different scales should be clearly defined to provide clarity for the plan user.</p>	Officers will address this issue when revising the Plan's text wording in the Renewable Energy section.
LDP2/4340/RR/3 Welsh Government	3	I have only noticed one typo in paragraph 43 and question whether overall completions totals 463 or 453 as indicated in Table 13.	<p>Amendments have been made to address these errors.</p> <p>Members to agree these amendments as shown in the attached track changes extracts from the Review Report in Table 12 and paragraph 35 on page 20 and in Table 13 and paragraph 43 on page 21. (see Appendix 2 to this report)</p>
LDP2/4389/RR/1 Mr K Bradney	3	<p>We in South Pembrokeshire have just spent two years writing letters and collecting petitions to object to wind turbine farm at Rhoscrowther. Our efforts were rewarded, firstly by a unanimous rejection of the proposal by the PCC Planning Committee, which had your support and a subsequent rejection of an appeal by the Cardiff based Inspector.</p> <p>As I made clear in my address to the council planning committee, a National Geographic survey placed Pembrokeshire second as an area of 'Sustainable Tourism' worldwide. There is no doubt in my mind that we secured this accolade because of the efforts of the National Parks Authority, especially your team in Pembrokeshire.</p> <p>Whilst we were objectors to the above mentioned proposal we do realise the necessity to advance the renewables cause to support action against 'Global</p>	It would not be appropriate or indeed defensible at Local Development Plan examination to apply a policy to restrict all surface mounted renewable energy schemes within the National Park, or for the Authority to object to all neighbouring schemes outside of its jurisdiction, without full consideration of the impacts. Renewable energy development can be acceptable within the National Park if sensitively located within its landscape context. Certain micro scale installations also benefit from permitted development rights and as such do not require planning permission. The Authority must remain impartial and assess renewable energy proposals, which do require planning permission, on a case by case basis. In this respect, the support for the current policy and guidance is noted.

Reference	Q	Representation/Answer	Officer Response
		<p>Warming'. I feel however that the rural nature, certainly of our county of Pembrokeshire should not be compromised by a headlong rush to cover our fields and coastal areas with turbines or Solar panels.</p> <p>Such proposals are not motivated by concern for the environment but are invariably profit/business driven. The development of tidal power is currently underway off our coast and if successful will provide a more controllable and regular source of energy which will have minimal social disruption.</p> <p>I would prefer the Parks' Renewable Energy Policy to reject all surface mounted renewable schemes within or close to a National Park. If this is not to be the case then I would support the current Policy (33) and the Renewable Energy Supplementary Guidance which currently exists.</p> <p>I have asked the council to further restrict schemes which seek to create an adverse visual impact on our beautiful county; or at the very least maintain the status quo.</p> <p>I would request the same action from Pembrokeshire Coast National Park authority.</p>	
LDP2/2708/RR/3 Pembrokeshire County Council	3	<p>Page 32, paragraph 72 (table) – comment: the adoption date for the PCC LDP was 28th February 2013 and the 1st review commencement date will be 28th February 2017.</p>	Review Report has been corrected.
LDP2/2708/RR/4 Pembrokeshire County Council	3	<p>Page 18, paragraph 29 – comment: please elaborate on why there is a lack of interest by landowners. For instance: Is this because aspirations of land value exceed what the market will pay? Is it because expectations on affordable housing provision are too high? Are there other reasons?</p>	<p>There are a range of reasons pertinent to individual landowners, some of whom do not wish to have the land developed at all or not within the time-scale of the Plan. In the case of some brownfield sites, the landowners are wishing to retain the current use of the site. No landowners are currently identifying land values nor affordable housing requirements as a constraint to bringing sites forward for development. The position on individual sites change over time and updates are included in the Annual Monitoring Reports. The current position will be included in a table appended to the Report of Consultation for the Review Report - copy included as Appendix 3 to this National Park Authority report.</p>
LDP2/2708/RR/2 Pembrokeshire County Council	3	<p>Page 13 – Renewable Energy – 12b – the achievement of renewable heat targets. Comment: this indicator and</p>	<p>Planning Policy Wales paragraph 12.8.9 requires local authorities to consider the contribution their area can make and</p>

Reference	Q	Representation/Answer	Officer Response
		target have proved hard to monitor (because many biomass projects have come forward as permitted development) – perhaps omit them?	ensure development plan policies enable this contribution to be delivered. The indicators for renewable heat stemmed from the Authority's Renewable Energy Assessment prepared in 2008. To inform the Review process, the Authority published a revised assessment in January 2016, which took into account changes in context such as the introduction of permitted development rights for micro technology and amended generation potential (that would require planning permission) for each renewable technology accordingly. The revised generation potential will inform the revised indicator target.
LDP2/3469/ RR/2 National Trust Erddig Consultancy	3	National Trust warmly supports the work being taken forward to establish a long term planning framework through LDP2.	Support noted.
LDP2/3469/ RR/3 National Trust Erddig Consultancy	3	National Trust wishes to support the preparation of a constraints map as part of LDP2.	Support noted.
LDP2/3469/ RR/4 National Trust Erddig Consultancy	3	National Trust wishes to emphasize the significance and challenge of potential land use change associated with climate change in Pembrokeshire. National Trust has recently issued a policy paper entitled Shifting Shores. Working with nature is really important to us across Pembrokeshire, and we see LDP2 as the key document to help bring forward managed change by working with nature. By understanding what is happening to the natural environment around our coast we can make well-informed choices about whether and where to continue maintaining hard sea defences, or to adapt and work with nature rather than against it. National Trust also wants to ensure that there is space and land to help with future changes at our coast. By 'rolling back' we can relocate buildings, infrastructure, shoreline and habitats to ensure coastal access is maintained as well as providing new homes for wildlife. The Pembrokeshire landscape has to be a key determinant in making those well informed choices. National Trust welcomes the opportunity to continue further discussions on Shoreline Management Plans and Coastal Adaptation and through LDP2 making appropriate and sensitive decisions on alternative land use. National Trust through its owned, tenanted and covenanted land in Pembrokeshire has a vital role in the management of key entry points for visitors: it will be important for an early start to discussions on the challenge of	The National Park Authority would be pleased to continue to engage in dialogue with the National Trust and other stakeholders affected by or involved in coastal change. The comment here is non-specific. The Local Development Plan recognises climate change as an overarching issue. The Trust may wish to identify specific sites for further consideration during the call for Candidate Sites which will be made later this year.

Reference	Q	Representation/Answer	Officer Response
		roll back and sensitive consideration of where displaced land use can be achieved, and where such land use may not be acceptable. National Trust welcomes an early start to such consideration through the processes being taken forward by LDP2.	
LDP2/3469/ RR/5 National Trust Erddig Consultancy	3	National Trust considers the growth of marine energy systems in Pembrokeshire as an important element of the future economic growth of the County. However, the Pembrokeshire Coast National Park will act as the interface of the marine systems with land based grid and infrastructure requirements. National Trust consider that early consideration of the land based requirements of marine energy should be considered as an early priority within LDP2 and appropriate supportive policies brought forward to reflect the new circumstances post 2021.	<p>Response is noted and it is agreed that the marine energy industry is likely to grow in Pembrokeshire.</p> <p>Local Development Plan Policy 33 Renewable Energy provides the current policy context for onshore grid connections from offshore development. It states that connections will be permitted subject to there being no overriding environmental and amenity considerations. Paragraph 4.149 accepts that technically feasible routes may not be available only on the developed coast; this would be taken into account when considering the impacts of proposals. The Authority's Renewable Energy Supplementary Planning Guidance also provides further guidance on onshore grid connections in Section 10.</p> <p>The current policy context is considered to provide a suitable basis for the consideration of onshore grid connection proposals for the replacement plan period as and when they come forward. The Authority welcomes early engagement with developers when designing schemes in this regard.</p>
LDP2/3469/ RR/6 National Trust Erddig Consultancy	3	National Trust welcomes the approach to Newgale and supports the requirement for a Newgale Adaptation Plan as a policy approach to be taken forward within LDP2.	Support noted.
LDP2/3643/RR/2 Mrs L Parker Manorbier	3	Why is there no mention of the additional land for Manorbier School?	Pembrokeshire County Council has advised that there is no longer a requirement for land to be allocated for the purpose of expanding the school.
LDP2/3643/RR/3 Mrs L Parker Manorbier	3	I do not think it is correct to say the Manorbier Station car park has been completed.	<p>Agreed.</p> <p>Pembrokeshire County Council has advised that higher than expected cost estimates as a result of Network Rail requirement combined with insufficient grant funding has prevented them completing the scheme. At present no alternative sources of funding have been identified to progress this work further. The Review Report will therefore need to be updated to reflect the latest position – see change to Table 16 on Page 25 of the Review Report (as shown in Appendix 2 attached).</p>

Reference	Q	Representation/Answer	Officer Response
LDP2/3643/RR/4 Mrs L Parker Manorbier	3	<p>It would be helpful to know:</p> <ul style="list-style-type: none"> a. The specific reasons sites are not progressing? b. What areas have severe infrastructure problems? c. The criteria for defining settlements? d. Housing needs for our community? 	<p>a. Updates on all allocated sites and large sites with planning permission are forwarded to the town and community councils twice a year. A further list has been provided following the recent workshops detailing the progress (or lack thereof) of each site. The current position will also be included in a table appended to the Report of Consultation for the Review Report - copy included as Appendix 3 to this National Park Authority report</p> <p>Information on the above is being sent to those who participated in the workshops.</p> <p>b. Infrastructure problems with the potential to significantly delay site development are currently being experienced at Solva and Dinas Cross.</p> <p>c. As explained at the recent Community Council workshops the criteria for selection Centres is set out in the current Local Development Plan (see paragraph 4.39 and footnote 75 of the Local Development Plan).</p> <p>The same criteria are being used to reassess the selection of Rural Centres for the replacement Local Development Plan and is referred to in the Review Report on page 29.</p> <p>More explanatory information should however be provided in the Review Report before it is finalised. Please see amendments proposed in the Review Report at paragraph 64, page 29 in Appendix 2 attached.</p> <p>d) As advised at the recent Community Council workshops need in the National Park is set out in the Local Housing Market Assessment and is also available as an appendix to the Housing Background Paper.</p> <p>Information on the above is being sent to those who participated in the workshops.</p>

Pembrokeshire Coast National Park

~~Draft~~ Review Report

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

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

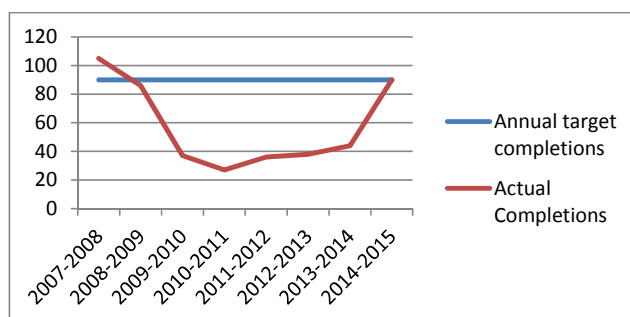
~~March~~ June 2016

PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY

Table 12 Housing Delivery 2007 to 2015

	Target Annual Completions	Completions Recorded	Target Annual Affordable Completions or u/c	Affordable Completions or u/c recorded
2007-2008	90	95	28	7
2008-2009	90	85	28	15
2009-2010	90	37	28	12
2010-2011	90	27	28	3
2011-2012	90	36	28	0
2012-2013	90	38	28	0
2013-2014	90	44	28	3
2014-2015	90	90	28	41
Total	720	452	224	81

35. The graph below illustrates the shortfall to date with completions averaging ~~58~~ 57 units per annum over the period 2007 to 2015.



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

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

38. Spatially performance has been mixed.

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

Table 13 Housing Delivery versus Requirement 2007 to 2015

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

How this impacts on the Plan Strategy

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

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

Affordable Housing

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

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

43. Overall completions totalled ~~463~~452, ~~64~~63% of the overall target.

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

How this impacts on the Plan Strategy

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

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

Development sites identified in the Plan

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

47. **Housing Allocations:** 12.5% of land allocated for housing in terms of area has been granted planning permission; 18.4% of units allocated have planning permission. A total of 60 houses have been completed on allocated sites which is 20% of the total number of units allocated in the Plan. The target is not being achieved. These sites will be reconsidered as part of the Local Development Plan Revision. Areas of the Plan for revision regarding housing land supply are identified under 'Housing Land Supply' and 'Affordable Housing' above.

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

sites are allocated as shown the [Annual Monitoring Report 2015](#), and they are not progressing. Reasons include lack of interest by the landowner, lack of developer interest and issues around the viability of bringing employment sites forward where there is a lack of public funding. These sites will be reconsidered as part of the Local Development Plan revision.

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

50. **Community Facilities:** The target was to have 33% of the land allocations with permission by the revision period (end of the financial year 2014/15). Two allocations were made in the Plan for community facility provision. The target of 33% has been met as one of the allocations has been partly implemented. The future of the second allocations will be reconsidered as part of the Local Development Plan Revision. The improvements allowed through an allocation would be achievable under Policy 48 Community Facilities and Infrastructure Requirements without the need for a further land allocation.

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

Key to Table 14

Planning permission granted/site completed	
Landowner or developer actively investigating bringing the site forward for development	
Allocation not progressing, e.g.:	
- Lack of interest by the land owner	
- Awaiting improvements to the housing market	
- Significant infrastructure constraint	

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

Table 16 Community Facilities

Site Ref	Site Name & Location	Use	Monitoring
CP829	Land at Saundersfoot Railway Station, Pentlepoir	Car park	Some pre application discussions have taken place. No further update for the 2015 Annual Monitoring Report.
CP828	Manorbier Station	Car park	Application NP/13/82 granted for 5 parking spaces; 1 disabled space, cycle parking and directional signs. This has been implemented. Pembrokeshire County Council advises that the cost of the work escalated beyond the allotted budget and other sources of funding have not been identified to date in order to complete the work.

Table 17 Road & Cycle Schemes

Scheme Number	Road/Cycle Schemes	Monitoring
RI1	New House Bridge Improvement A4075	A major realignment is now unlikely. Work will be focussed on the provision of a shared use path from Bluestone Roundabout the Eagle Lodge and some localised visibility improvements. Could be developed in phases with S106 funding from Bluestone.
RI2	Shared Use Path south of Carew Castle	Work is completed.
RI3	St Petrox Bends Improvement	A scaled back and localised version of the original aspiration is now being considered by Pembrokeshire County Council.
RI4	Fan Road/B4316 Junction Improvement, Saundersfoot	Not implemented. No progress to date.
RI5	Gumfreston to Tenby Phase 3	Automatic flood warning signs being designed. Work should be complete in 2015/16.
RI6	Glasfryn Lane, St Davids	Local Transport Funding from the Welsh Government was secured in 2015 to complete land acquisition, accommodation works and prepare tender documentation. The main works are to be undertaken in 2016/17 (subject to the successful outcome of future LTF bid submission).
RI7	A40 Canaston Bridge	Scheme completed and road opened on 16 th March 2011.

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

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

Neighbouring Local Development Plans

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

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

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

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

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

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

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

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

Appendix 3 Information on sites

Key to Table

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

Allocations that include housing

	Location Proposals Map ID	Site Name and Location	Total number of Units ¹	Comments
1.	Broad Haven HA734	South of Driftwood Close	10	Land has outline planning permission for 6 market and 4 affordable units
2.	Broad Haven MA776	Land north east of Marine Road	35	Landowners are preparing a planning application to develop the site for market and affordable housing.
3.	Crymych HA750	Depot Site	18	Site is being developed for affordable housing. Completion anticipated mid 2016.
4.	Dale HA382	Castle Way	12	Landowner unable to provide definitive details of intention to develop the site.
5.	Dinas Cross HA387	Opposite Bay View Terrace	12	Landowners not wishing to develop the site.
6.	Herbrandston HA732	East of Herbrandston Hall	12	Landowner unknown and no approach made to the Authority regarding the development of the site.
7.	Jameston HA436	North of Landway Farm	6	Site is being developed for 5 market and 1 affordable dwelling.
8.	Jameston HA730	Opposite Bush Terrace	35	Landowner recently confirmed intention to bring site forward for development.
9.	Jameston HA821	Green Grove	5	Land has outline planning permission for 6 market houses and site for 3 affordable houses.
10.	Lawrenny HA559	Adj Home Farm	30	Landowner is preparing planning application.
11.	Manorbier Station HA848	Field opp Manorbier VC School	19	Landowner is marketing site with view to it being developed.

¹Reflects number of units granted planning permission as at April 2015

	Location Proposals Map ID	Site Name and Location	Total number of Units¹	Comments
12.	Manorbier Station MA895	Land part of Buttylands	15	Pre-application discussion relating to development of the site for affordable housing.
13.	New Hedges HA813	Rear of Cross Park	31	Site has planning permission for market and affordable housing.
14.	Newport HA825	North of Feidr Eglwys	20	Site has planning permission for market and affordable housing, subject to finalization of a Section 106 Agreement.
15.	Saundersfoot MA777	Rear of Cambrian Hotel, Saundersfoot	28	Site is under construction for 22 market and 6 affordable dwellings and commercial buildings.
16.	Solva HA384	Adj Bro Dawel	18	Landowner has recently indicated intention for bringing this site forward for development. Timescales may be constrained by need for additional Sewage Treatment Capacity.
17.	Solva HA792	Bank House, Whitchurch Lane	12	Landowner unable to provide definitive details of intention to develop the site.
18.	St David's HA385	North of Twr-y-Felin	13	Site is under construction and nearly completed.
19.	St Davids HA737	West of Glasfryn Rd	90	Land is subject of interest of Community Land Trust to development for housing and other uses.
20.	St David's HA789	Adj Ysgol Bro Dewi, Nun Street	10	Landowner unable to provide definitive details of intention to develop the site.
21.	St Ishmaels MA733	Adj School	40	Planning application for part of the site refused in November 2015 (Appeal being lodged). Planning application for the remaining land also expected within 2016.
22.	Tenby HA377	Brynhir	168	Landowner has marketed site and has a preferred buyer. Planning application for development expected within 12 months of purchase.
23.	Tenby HA723	former cottage Hospital Site	10	Site is now under construction.
24.	Tenby HA724	Rectory Car Park	50	Landowners intend to retain as a car park.
25.	Tenby HA727	West of Narberth Road	25	A planning application for the development of this site is anticipated mid 2016.

	Location Proposals Map ID	Site Name and Location	Total number of Units¹	Comments
26.	Tenby HA752	Butts Field Car park, Tenby	80	Landowners intend to retain as a car park.
27.	Tenby HA760	Reservoir Site, Tenby	12	Landowner unknown and no approach made to the Authority regarding the development of the site.
28.	Tenby MA706	Upper Park Road, Tenby	14	Site under construction
29.	Tenby MA707	White Lion St/Deer Park, Tenby	48	Site under construction
30.	Tenby MA710	Sergeants Lane, Tenby	5	No recent indication of housing development but redevelopment site in Centre of Tenby.
31.	Trefin HA738	North of Heol Crwys	15	Landowner unknown and no approach made to the Authority regarding the development of the site.
	Total		898	

APPENDIX 4

Representations on the Pembrokeshire Coast National Park Local Development Plan Draft Delivery Agreement

Questionnaire

- Q1. Does the document give you a clear idea of how everyone can get involved? Yes/ No (please explain why)/ Not Sure.
- Q2. Are the methods of engagement appropriate for their intended audience and the stages in preparation of the Plans? Yes/ No (please explain why)/ Not Sure.
- Q3. Do you think that the timescales for preparation proposed are appropriate? Yes/ No (please advise how they should be changed)/ Not Sure.
- Q4. Do you think we have identified the correct 'seldom heard' groups? Yes/ No (please advise what changes you think we should make)/ Not Sure.
- Q5. Do you think we have identified appropriate nominees for the Key Stakeholder Group? Yes/ No (please advise what change you would like to see made)/ Not Sure.
- Q6. Do you think we have identified an appropriate role for the Town and Community Councils? Yes/ No (please advise what change/s you would like to see made)/ Not Sure.
- Q7. Is there anyone else that you think we should include? Yes (please explain)/No /Not sure.

Reference	Question	Representation	Officer Response and Recommendation
LDP2/3643/DA/1 Mrs L Parker Manorbier	1	No. It is not clear how the Community Council is to carry out its role.	The Authority will seek to utilise the existing consultation networks that Town and Community Councils have with their respective communities (in combination with the other means of advertisement programmed). The cooperation of Town and Community Councils in this regard should help to disseminate information to the general public. The Authority anticipates that Town and Community Councils will voice the opinions of their respective communities back to the Authority in consultation responses. Town and Community Councils can also submit Candidate Sites that they feel would be suitable for development, including for affordable housing. This is outlined in paragraphs 72-75 of the Draft Delivery Agreement. Town and Community Councils

Reference	Question	Representation	Officer Response and Recommendation
			<p>will be notified of each key stage throughout the review process. An Information Pack will be sent to each Town and Community Council, which provides a summary of the Review process and work done to date.</p> <p>Officers are available to answer any specific queries that Community and Town Councils may have, for example on how to submit Candidate Sites. The Authority is also exploring the production of 'Easy Read' versions of the consultation documents to make them more accessible.</p>
LDP2/2883/DA/1 Eglwswrw Community Council	1	Yes	Response noted.
LDP2/2916/DA/1 Tenby Town Council	1	Yes	Response noted.
LDP2/3643/DA/1 Pembrokeshire County Council	1	Yes	Response noted.
LDP2/4303/DA/1 Mr & Mrs P Hunt	1	No – As local residents, it is not clear how we can actively engage in the planning process, or have opportunities to comment on specific plans that may affect us prior to their final submission.	<p>Opportunities to engage and influence the Revision process are mainly at Pre-Deposit stage. Opportunities to influence the strategy and individual site selection process diminish after this stage. Members of the public have the opportunity to submit Candidate Sites for consideration in August to October 2016 (circa). The Candidate Site Register will be published as part of the Preferred Strategy in April/May 2017 (circa) to enable communities and individuals to view potential sites in their area and comment prior to the submission of the Deposit Plan. Town and Community Council Workshops are programmed in January/February 2017 to discuss potential changes in their areas. Town and Community Councils are expected to voice the concerns of their respective communities.</p> <p>Officers are available to advise</p>

Reference	Question	Representation	Officer Response and Recommendation
			members of the public on how to engage, the key stages of the Review and their timings. This can be done over the telephone or by meetings if required.
LDP2/3643/DA/2 Mrs L Parker Manorbier	2	No. The proposed seminars are not adequate to prepare the Community Councils for their role. They will need more specific help and advice.	Officers are also available to advise Town and Community Councils on any specific queries they may have, this could be by telephone or meetings if required.
LDP2/2883/DA/2 Eglwswrw Community Council	2	Not Sure	The methods of engagement outlined in the Community Involvement Scheme seek to maximise the level of engagement with the available resources available to the Authority and the prescribed time constraints it must operate within. Officers are available to advise Town and Community Councils or any member of the public on any specific queries they may have on how to be involved with the Review process, this could be by telephone or meetings if required.
LDP2/2916/DA/2 Tenby Town Council	2	Yes	Response noted.
LDP2/3643/DA2 Pembrokeshire County Council	2	Yes	Response noted.
LDP2/4303/DA/2 Mr & Mrs P Hunt	2	No – Although the information on the website and that sent via the direct mailing list is very useful (and we request to be kept on this list), it is always retrospective. Engagement in addition to feedback would be preferable, particularly in relation to large schemes that are going to have considerable effect on the local population.	Opportunities to engage and influence the Revision process are mainly at Pre-Deposit stage. Opportunities to influence the strategy and individual site selection process diminish after this stage. Members of the public have the opportunity to submit Candidate Sites for consideration in August to October 2016 (circa). The Candidate Site Register will be published as part of the Preferred Strategy in April/May 2017 (circa) to enable communities and individuals to view potential sites in their area and comment prior to the submission of the Deposit Plan. Town and Community Council Workshops are programmed in January/February 2017 to discuss potential changes in

Reference	Question	Representation	Officer Response and Recommendation
			<p>their areas. Town and Community Councils are expected to voice the concerns of their respective communities.</p> <p>The Authority has committed to raising awareness at an early stage in the Revision process and to maximise opportunities for the public to engage, whilst working within the confines of available resources, planning legislation and guidance. Again it is stressed that Officers are available to advise members of the public on the process and how they can effectively engage.</p>
LDP2/3643/DA/3 Mrs L Parker Manorbier	3	Not sure.	The proposed Replacement Plan timetable has been produced to comply with the Town and Country Planning (Local Development Plan) (Wales) Regulations as amended in 2015. The Welsh Government Local Development Plan Manual (2015) states that the revision procedure should take considerably less than 4 years. The timetable takes account of available resources, consultation periods, programmed engagement and Committee dates. Other factors that may influence the timetable are listed in Appendix 3 of the Draft Delivery Agreement.
LDP2/2708//DA/3 Pembrokeshire County Council	3	Not sure. Deposit March 2018 to Submission September 2018 looks like a very tight timescale.	Agreed. After reviewing the timetable and the work involved during this stage, it is considered necessary to extend the submission date to December 2018. This should still allow for examination in Spring 2019 (the previous Local Development Plan was submitted in December 2009 and examined in Spring 2010) and so would not extend the timetable overall. Officers will meet with the Planning Inspectorate on 26 th May to confirm the timetable.
LDP2/2883/DA/3 Eglwswrw Community	3	Yes	Response noted.

Reference	Question	Representation	Officer Response and Recommendation
Council			
LDP2/2916/DA/3 Tenby Town Council	3	Yes	Response noted.
LDP2/4303/DA/3 Mr & Mrs P Hunt	3	Yes	Response noted.
LDP2/3643/DA/4 Mrs L Parker Manorbier	4	Not sure.	The list of Seldom Heard Groups in Appendix 4 of the Draft Delivery Agreement is based on up to date research of the current groups representing those who have traditionally not participated in plan preparation. New groups/organisations can be added. Exploration and production of 'Easy Read' documents may highlight others that need to be included within this group.
LDP2/2883/DA/4 Eglwswrw Community Council	4	Not sure	The list of Seldom Heard Groups in Appendix 4 of the Draft Delivery Agreement is based on up to date research of the current groups representing those who have traditionally not participated in plan preparation. New groups/organisations can be added if required. Exploration and production of 'Easy Read' documents may highlight others that need to be included within this group.
LDP2/2916/DA/4 Tenby Town Council	4	Yes	Response noted.
LDP2/3643/DA/4 Pembrokeshire County Council	4	Yes	Response noted.
LDP2/4303/DA/4 Mr & Mrs P Hunt	4	Yes	Response noted.
LDP2/3643/DA/5 Mrs L Parker Manorbier	5	Not sure.	The Key Stakeholders comprise neighbouring authority areas, statutory consultees, professional networks/groups and local interest groups with whom the Authority will work closely with throughout the Review process to ensure the Plan meets the tests of soundness.
LDP2/2708/DA/5 Pembrokeshire County Council	5	Not sure. Maybe also include one or more of the umbrella organisations for Town / Community Councils – One Voice Wales and / or PALC (if still extant).	One Voice Wales and the Pembrokeshire Association of Local Councils are both included as Key Stakeholders in Appendix 4 of the Draft Delivery Agreement. This has been clarified with Pembrokeshire

Reference	Question	Representation	Officer Response and Recommendation
			County Council.
LDP2/2883/DA/5 Eglwswrw Community Council	5	Yes	Response noted.
LDP2/2916/DA/5 Tenby Town Council	5	Yes	Response noted.
LDP2/4303/DA/5 Mr & Mrs P Hunt	5	Yes	Response noted.
LDP2/3643/DA/6 Mrs L Parker Manorbier	6	Not sure. This depends on the level of support they will have. Will there be costs involved? Without more help and advice I do not think the role will be possible.	<p>The Authority will seek to utilise the existing consultation networks that Town and Community Councils have with their respective communities (in combination with the other means of advertisement programmed). The Authority does not envisage a significant added cost for Town and Community Councils.</p> <p>Officers are available to advise Town and Community Councils on any specific queries they may have, this could be by telephone or meetings if required.</p>
LDP2/2708/DA/6 Pembrokeshire County Council	6	Not sure. Agree with paragraphs 72 to 75, but perhaps also ensure some representation on the key stakeholder group – see question 5 above.	The Pembrokeshire Association of Local Councils is included as a Key Stakeholder in Appendix 4 of the Draft Delivery Agreement. This has been clarified with Pembrokeshire County Council.
LDP2/2883/DA/6 Eglwswrw Community Council	6	No. There needs to be more notice taken of the Town and Community Council views, as at present there is no voice with the Community Council.	<p>The Authority is keen to establish effective networks of engagement with Town and Community Councils to inform the Review process and seeks to utilise the existing consultation networks that they have with their respective communities (in combination with the other means of advertisement programmed).</p> <p>As part of encouraging engagement, the Authority has held four Town and Community Council workshops at different locations for each area of the National Park to introduce the Review process and highlight key stages and methods of engagement. Further workshops are programmed with Town and Community</p>

Reference	Question	Representation	Officer Response and Recommendation
			<p>Councils to discuss Candidate Site selection and areas of potential change for the Preferred Strategy stage in January/February 2017.</p> <p>The Authority will produce an Information Pack to be sent to all the National Park Councils, is exploring the production of 'Easy Read' versions of its consultation documents, has included the Pembrokeshire Association of Local Councils and One Voice Wales as Key Stakeholders and held a Key Stakeholder Workshop to introduce the Review process.</p> <p>Officers are available to advise Town and Community Councils on any specific queries they may have on how to be involved with the Review process, this could be by telephone or meetings if required.</p> <p>In terms of how planning applications are determined (and the same principle would apply to the preparation of Local Development Plans) Planning Policy Wales Edition 8, paragraph 3.1.8 advises</p> <p>'When determining planning applications local planning authorities must take into account any relevant view on planning matters expressed by neighbouring occupiers, local residents and any other third parties. While the substance of local views must be considered, the duty is to decide each case on its planning merits. As a general principle, local opposition or support for a proposal is not, on its own, a reasonable ground for refusing or granting planning permission; objections, or support, must be based on valid planning considerations.'</p>
LDP2/2916/DA/6 Tenby Town Council	6	Yes	Response noted.

Reference	Question	Representation	Officer Response and Recommendation
LDP2/4303/DA/6 Mr & Mrs P Hunt	6	Yes	Response noted.
LDP2/2916/DA/8 Tenby Town Council	7	We fully agree with the stated wish that Town and Community Councils and their Councillors can provide a central source of information for their local communities, they can help raise awareness of the Review process and relay local views and opinions back to the Authority.	The Authority welcomes this support for the role of Town and Community Councils.
LDP2/2708/DA/7 Pembrokeshire County Council	7	No.	Response noted.
LDP2/2708/DA/8 Pembrokeshire County Council	7	Page 10, paragraph 40, sentence 3 – <i>'would result in unhelpful uncertainty for decision making on planning applications during plan preparation'</i> The emerging replacement plan would carry little weight in the decision making process on applications until the Inspector's Report is received. In the interim, adopted LDP(s) will provide the certainty required. However, this issue could be problematic if the adopted plan is beyond its end date.	This paragraph coincides with paragraph 79 of the draft Review Report and a report approved by Pembrokeshire County Council Cabinet on 14 th September 2015. The text highlighted relates to the implications upon the Council in terms of conducting an early Review.
LDP2/4340/DA/1 Welsh Government	7	Paragraph 22 refers to key policy and guidance on LDPs – LDP Wales, Planning Your Community: A guide to Local Development Plans 2006 (to be updated). At present we are not planning to update the document, so please delete reference 'to be updated'.	Response noted. The text '(to be updated)' will be deleted from the Delivery Agreement.
LDP2/4340/DA/2 Welsh Government	7	We suggest changing the term 'stepping stones' in paragraph 25. We suggest either the use of 'supplementary', or amending the sentence.	Agreed. This sentence will be amended in the draft to read: 'Guidance notes, briefs and other supplementary guidance act as stepping stones between <u>provide detail to</u> the policies of the Local Development Plan

Reference	Question	Representation	Officer Response and Recommendation
			and planning applications considerations. *Underlined text to be added.
LDP2/4340/DA/3 Welsh Government	7	We note that paragraph 26 refers to 'Place Plans'. The authority should clearly communicate the role of the authority and that of Town and Community Councils in preparing Place Plans.	Agreed. To provide greater clarity the second and third sentence of paragraph 26 will be amended to read: 'Additional guidance can however be programmed for production after adoption of the replacement plan <u>in accordance with paragraph 2.4.6 of Planning Policy Wales (Edition 8) 2016.</u> This could for example include the production of Place Plans for specific allocated sites <u>where the existing networking capabilities of Town and Community Councils, with their respective communities, can be utilised to encourage community engagement to inform the process.</u> *Underlined text to be added.
LDP2/4340/DA/4 Welsh Government	7	We note the authority will identify SPG to be taken forward from the current LDP at pre-deposit/ deposit stage (paragraph 27). The authority could consider whether it would be beneficial to consult on SPG as part of the LDP process.	The Authority has considered the option of consulting on SPG documents during the Review process. It is considered however that a lack of resources would make this unfeasible.
LDP2/4340/DA/5 Welsh Government	7	The consultation procedures for the preparation of SPG and forms of notification and advertising have been set out in paragraph 28. The authority should also ensure it is clear what forms of notification the authority intends to undertake for the formal LDP consultation stages.	Agreed. A new table will be inserted after the timetable in Section 2 of the draft Delivery Agreement to specify the forms of notification at each formal consultation stage.
LDP2/4340/DA/6 Welsh Government	7	Paragraph 38 refers to 'many other plans and processes' being relevant to the LDP', yet these are not listed. Further clarity could be provided on the integration of the LDP with other strategies – such as the National Park	Agreed, a list of the main plans will be inserted although will not be exhaustive due to the number involved. Other plans and processes may also be published throughout the Review process, the implications of which will need

Reference	Question	Representation	Officer Response and Recommendation
		Management Plan.	to be considered for the Replacement Plan.
LDP2/4340/DA/7 Welsh Government	7	We note that the authority has detailed its staffing resources in paragraph 45. As set out in the LDP Manual (paragraph 4.3.4.3) details on budgets and the financial costs committed to LDP preparation should be submitted to the Welsh Government (but are not required to be published as part of the DA).	Response is noted. Details will be provided to Welsh Government.
LDP2/4340/DA/8 Welsh Government	7	In section 2, the table sets out details on the definitive stage of LDP preparation. We note the authority intends to undertake an eight week consultation for the Review Report, Delivery Agreement and Sustainability Appraisal Scoping Report. It would be beneficial if the proposed length of the consultation periods for pre-deposit and deposit consultation stages were also stated.	Agreed, the statutory consultation period lengths will be added for pre-deposit and deposit consultation stages in the timetable. Both periods will run for 6 weeks in accordance with Regulations 16 and 18 of the Local Development Plan Regulations 2005 (as amended). The Authority will also make the documents available 2 weeks in advance of the statutory consultation period.
LDP2/4340/DA/9 Welsh Government	7	In relation to the timetable for preparing the LDP, we note that the authority has currently timetabled the pre-deposit consultation for April/May 2017 which will overlap with local elections. It is a matter for the National Park authority to ensure it has considered the likely impact this may have upon the proposed timing of the consultation.	The Authority has considered the potential impacts the elections may have on the Review process. Committee membership may change after consultation of the Preferred Strategy. There is inherently some risk that the new Committee membership may not agree with the Preferred Strategy consulted on and as such may require a re-visit of this stage. It is however not considered feasible to move the Preferred Strategy consultation stage earlier in the process, to enable adoption of the subsequent Initial Consultation Report prior to the elections (currently programmed for September 2017). Holding consultation until after the elections may cause unnecessary delay and would require the Review timetable to be extended overall.

Reference	Question	Representation	Officer Response and Recommendation
			This would compromise the Authority's ability to complete the Review process in considerably less than four years, as required by the Welsh Government Local Development Plan Manual 2015 (para 10.2.5)
LDP2/4340/DA/10 Welsh Government	7	We note that a two month slippage allowance has been referred to in the DA, which is in accordance with advice in the LDP Manual (paragraph 4.3.3.3). However, the authority should be made aware that this slippage allowance is the only tolerance that the Welsh Government will permit throughout the whole LDP process (as part of the authority's first DA). Any subsequent revision to the DA timetable will not permit the inclusion of a slippage allowance.	Response is noted. The Authority has sought to provide as realistic a timetable as possible based on factors within its control.
LDP2/4340/DA/11 Welsh Government	7	As set out in paragraph 4.3.4.5 of the LDP Manual, the authority should ensure that the Planning Inspectorate Wales are consulted on the Delivery Agreement to enable them to plan their workload.	Response is noted. The Authority has consulted the Planning Inspectorate Wales on the Draft Delivery Agreement and has a meeting scheduled at the National Park Office with the Planning Inspectorate Wales to discuss.
LDP2/4340/DA/12 Welsh Government	7	We would be happy to meet or arrange a VC to discuss the above points, although as you will see, we do not have any major concerns regarding either the Review Report or Delivery Agreement.	The Authority welcomes the detailed comments provided by Welsh Government and the offer for a video conference. However, given the content of the comments, no video conference is considered necessary, the comments made are clear.
LDP2/1670/DA/1 Bourne Leisure	7	The Draft Delivery Agreement notes that Pembrokeshire Coast National Park Authority will consult with various groups of consultees at the different stages of the preparation of the LDP Replacement Plan. These include several groups of statutory consultees plus other key stakeholders	The Authority welcomes active engagement with Bourne Leisure to inform the Review process. The 'Other Consultees' are specified in the Local Development Plan Manual prepared by Welsh Government and doesn't include companies such as Bourne Leisure. However, Bourne Leisure is on the Authority's mailing list for

Reference	Question	Representation	Officer Response and Recommendation
		<p>within the National Park.</p> <p>The “Other Consultees” group includes organisations <i>“which do not necessarily fall within the above categories listed for general consultation bodies, but still have an interest in the National Park which may be affected by the Local Development Plan”</i> (paragraph 81). The Council will provide opportunities for these bodies to comment at key formal stages of the development of the LDP Replacement Plan.</p> <p>Bourne Leisure is keen to engage with the LDP Replacement Plan preparation process in order to represent its interests within the local tourism sector and economy. Therefore, as a major contributor to the tourism industry in the National Park and a key stakeholder within the local economy, Bourne Leisure requests to be included in the Council’s list of “Other Consultees”.</p> <p>We trust that these representations are clear and will lead to further amendments to the emerging Plan where suggested. Please do not hesitate to contact either my colleague Stephanie Irvine or me, should you require any clarification of any of the points made. We would also be grateful if you would keep us informed in future of any further consultation stages on the Replacement LDP and any other emerging local development documents.</p>	<p>notification of all key stages of the revision process.</p> <p>Officers are available to advise Bourne Leisure on any specific queries in relation to the Revision process, this could be by telephone or meetings if required.</p>

Reference	Question	Representation	Officer Response and Recommendation
LDP2/1670/DA/1 Natural Resources Wales	7	The document reads well and the timescales appear practical. Only issue could be Local Government reorganisation which may directly affect the Pembrokeshire Coast National Park Authority and Pembrokeshire County Councils boundaries/planning authorities' setup.	Agreed that Local Government reorganisation would directly affect the Review process although no certainty is currently available on whether this will happen and if so when. The Authority must therefore proceed with the Review under the current organisational context.
LDP2/1670/DA/2 Natural Resources Wales	7	The report allows a "2 month leeway/tolerance" period is built in to the delivery timescales. (Para 42) to allow for slippage.	Noted.
LDP2/1670/DA/3 Natural Resources Wales	7	No further SPGs are envisaged at present but after the adoption of the replacement plan the situation will be reviewed.	Noted.
LDP2/1670/DA/4 Natural Resources Wales	7	Overall the draft Delivery agreement seems sound and there are no adverse comments.	Response noted.
LDP2/2916/DA/7 Tenby Town Council	7	No	Response noted.
LDP2/4303/DA/7 Mr & Mrs P Hunt	7	Yes – Use of local residents throughout the planning stage of any large development scheme to act as a sounding board and give a more rounded view to the decision-making process is desirable. It is good to note that robust soundness testing is being applied to the review of the LDP and that examination will take for form of public discussion.	New statutory requirements for developers to consult with local communities on major development proposals, at pre-application stage, should provide greater opportunity for communities to influence development schemes before they are submitted to the Authority for consideration. This is required under The Town and Country Planning (Development Management Procedure) (Amendment) (Wales) Order 2016.
LDP2/4303/DA/8 Mr & Mrs P Hunt	7	Early and continued engagement with local residents is essential for feedback regarding proposals. Planners and Developers get the opportunity to engage in an iterative process whereby they can refine plans over a long period. This process and	See Officer response above.

Reference	Question	Representation	Officer Response and Recommendation
		<p>information is not available to the general public who can only comment during a brief window at the end stage, when fully worked up plans and schemes are submitted.</p> <p>More transparency, in the form of published meeting notes would be preferable, so that we are able to follow the progress of plans throughout the development process; and also for the National Park to invite residents to attend these preliminary meetings in order to give a sense of balance. This is a method adopted by other large organisations throughout the pre submission stage of planning.</p> <p>As local residents, we are the ones who will be most affected by any scheme in our area and we would like the opportunity to comment and have our queries and concerns addressed.</p>	

Pembrokeshire Coast National Park

Local Development Plan – Replacement Plan (2015-2031)

| ~~Draft~~ Delivery Agreement

| June 2016

| **PEMBROKESHIRE COAST NATIONAL PARK
AUTHORITY (~~Draft March 2016~~)**

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Executive Summary

1. Each Local Planning Authority is required by the 2004 Planning and Compulsory Purchase Act 2004, to undertake regular reviews of the Local Development Plan at intervals no longer than 4 years from the time when it was adopted. This is to ensure that there is a regular and comprehensive assessment of whether the plan remains up to date or whether changes are needed. The Pembrokeshire Coast National Park Local Development Plan was adopted in September 2010. The Local Development Plan monitoring and review section proposes a full review of the Plan at the end of the financial year 2014-2015. The Authority has been awaiting the publication of Welsh Government regulations guidance on the review and revision process.
2. This draft Delivery Agreement contains a timetable of key stages of Plan preparation (Chapter 2) and the methods by which the community will be engaged (Chapter 3). This draft Delivery Agreement also details how and when the National Park Authority will carry out the Sustainability Appraisals for the Plans, and what our approach to Supplementary Planning Guidance will be.
3. Before finalising the Delivery Agreement, it will be sent to all 'Specific Consultation Bodies and 'UK Departments' listed in Appendix 4. A letter notifying of its availability will be sent to all those on the Mailing List. Copies will be placed in local libraries and on the website. Awareness of the consultation process will also be raised at a Stakeholder Workshop and Community and Town Council workshops.
4. Formal approval of this Delivery Agreement by the National Park Authority is planned for June/July 2016, after which it will be sent to Welsh Government for agreement. The final Delivery Agreement will then be publicised.
5. The timetable for the Local Development Plan contains definitive stages and indicative stages. Indicative stages are those listed below following Deposit Stage. This will be converted into firm dates prior to submission of the Local Development Plan.
6. The key stages are:

Stage	Replacement Plan Complete by (considerably less than 4 years)
Review Report	June/July 2016
Delivery Agreement	June/July 2016
Pre-Deposit participation	June/July 2016 – February 2017
Pre-Deposit consultation	April/May 2017
Deposit	March 2018
Submission to Welsh Government	September-December 2018
Examination	Spring 2019
Adoption	End of 2019

7. The Authority has followed the Welsh Government's guidance by estimating a timetable of considerably less than four years for the preparation of the replacement Local Development Plan.
8. The aim of engaging stakeholders in the preparation of the Replacement Plan is to gain consensus on the best way forward for the future of the National Park.
9. Any proposed change in policy will be subject to public consultation in compliance with national policy, guidance and regulation. Policies can be ultimately added, amended or deleted from the Plan by the appointed Inspector. The Authority will follow the advice provided in section 2.8 of Planning Policy Wales Edition 8 January 2016 when considering the status of the emerging replacement Plan.

- guide decision making on whether planning permission should be granted or refused.
19. The Plan contains less detail than previous Plans. Welsh Government expect Local Development Plans to include a limited number of succinct area wide policies focussing on an area's main needs and opportunities. Repeating national planning policy must be avoided.
 20. The Authority is required to review the Local Development Plan every four years. On the advice of Welsh Government officials, it was agreed to await the release of the revised Local Development Plan Regulations and supporting policy and guidance before formally starting this Review.
 21. Regarding the status of a Replacement Plan any proposed change in policy will be subject to public consultation in compliance with national policy, guidance and regulation. Policies can be ultimately added, amended or deleted from the Plan by the appointed Inspector. The Authority will follow the advice provided in section 2.8 of Planning Policy Wales Edition 8 January 2016 when considering the status of the emerging replacement Plan.
 22. Key policy and guidance on the preparation of Local Development Plans and the requirements of Local Planning Authorities to engage with their communities and stakeholders is included in:
 - Planning Policy Wales (Edition 8) 2016
 - Technical Advice Notes – various dates
 - The Town and Country Planning (Local Development Plan) Wales Regulations 2005 – ('the LDP Regulations')²
 - Local Development Plan Manual (Edition 2) 2015
 - Local Development Plan Examinations – Procedure Guidance 2015 (The Planning Inspectorate)
 - Local Development Plans Preparing for Submission – Guidance for Local Planning Authorities (2015) The Planning Inspectorate
 - Local Development Plan Wales, Planning Your Community: A guide to Local Development Plans 2006 ~~(to be updated)~~
 - The statutory requirements for Strategic Environmental Assessment (SEA), Sustainability Appraisal (SA) and Habitats Regulation Assessment (HRA)

Revision Procedure and the Soundness Tests

23. The draft Review Report summarises the main topic areas where the current Local Development Plan is not considered to be performing, where it is out of date due to contextual changes and which parts of the plan therefore require review. Based on the significance of the changes required, the Authority intends to produce a replacement plan.
24. When preparing or reviewing a Local Development Plan the National Park Authority must ensure that the Plan is prepared correctly and it meets the 3 tests of

² As amended, including by the Town and planning (Local Development Plan)(Wales)(Amendment) Regulations 2015 ('the 2015 Amendment Regulations')

soundness outlined within the Local Development Plan Manual Edition 2 (August 2015):

- Does the Plan fit? (i.e. is it clear that the Plan is consistent with other Plans?)
- Is the plan appropriate? (i.e. is the plan appropriate for the area in light of the evidence?)
- Will the Plan deliver? (i.e. is it likely to be effective?)

See Appendix 1 for further detail on the Soundness Tests and their application at Examination.

Supplementary Planning Guidance

25. Guidance notes, briefs and other supplementary guidance ~~act as stepping stones between~~ provide detail to the policies of the Local Development Plan and planning applications considerations. The Authority has adopted a number of supplementary planning guidance documents since the adoption of the Local Development Plan in 2010. These can be viewed on the Authority's website.
26. It is not currently envisaged that any additional supplementary planning guidance in support of the replacement Local Development Plan will be prepared and consulted upon. Additional guidance can however be programmed for production after adoption of the replacement plan in accordance with paragraph 2.4.6 of Planning Policy Wales (Edition 8) 2016. This could for example include the production of Place Plans for specific allocated sites, where the existing networking capabilities of Town and Community Councils, with their respective communities, can be utilised to encourage community engagement to inform the process.
27. Likely areas where guidance will be produced or taken forward from the existing Local Development Plan will be identified at Pre-Deposit/Deposit stage.
28. Consultation on guidance will be with target groups relevant to the matter being considered and will include relevant community councils. There are a number of steps to be taken with guidance:
 - A press release notifying publication of the draft guidance will be given in the local newspaper and on the Authority's website www.pembrokeshirecoast.org.uk. This will advise on when and where the guidance can be inspected.
 - Notice will be given in writing to the appropriate statutory consultees, targeted groups and known interested parties.
 - Paper copies of the document will be available at the Authority's Offices in Pembroke Dock, during office hours, for inspection.
 - Copies will be available to view or download on the Authority's website.
 - The consultation will last six weeks.
 - All comments are public information.
 - All comments received will be reported to the National Park Authority.
 - Following final agreement of the guidance a report of consultation showing how the responses were dealt with by the National Park Authority will be published.
 - All those who participated in the consultation, relevant community councils and statutory consultees will be notified of the availability of the adopted guidance and the report of consultations.

What does this National Park Authority want to achieve?

36. National Park Authorities have two statutory purposes, set out in the Environment Act 1995:

- to conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park
- to promote opportunities for public enjoyment and understanding of the special qualities of the National Park

and a statutory duty:

- in performing these purposes to seek to foster the economic and social wellbeing of communities living within the National Park.

37. The central role of this National Park Authority is to take the action needed to put into practice the purposes of National Parks.

How does this replacement plan fit in with other Plans being prepared for the area?

38. Many other plans and processes are of relevance to the Local Development Plan. Similarly, the Local Development Plan is highly relevant to other plans. The essential relationship between all these plans must be one of complementarity, and of added value. Some of the most relevant ones are listed below, this list is not exhaustive. The Background Papers provide further detail on how relevant plans, strategies and legislation have been considered. Future plans, strategies and legislation may become relevant throughout the Review process, the implications of which will need to be considered for the Replacement Plan.

- Environment (Wales) Act 2016
- Well Being of Future Generations Act 2015
- Rural Development Plan for Wales 2014-20
- National Park Management Plan 2015-19
- National Park Corporate Plan 2016/17
- Pembrokeshire Single Integrated Plan 2013-2018
- National Planning Policy and Guidance
- Neighbouring Authority Local Development Plans (Pembrokeshire, Carmarthenshire and Ceredigion County Councils)
- Local Biodiversity Action Plan for Pembrokeshire
- Shoreline Management Plans (West of Wales and South Wales) 2014

~~38.~~39. Section 62 (ii) of the Environment Act 1995 requires organisations to 'have regard to' National Park purposes in transacting their own business. We will seek to ensure that the Local Development Plan is a key, shared, vehicle in which we and our partners articulate our commitments to these outcomes when applicable.

Why not prepare a joint replacement plan with Pembrokeshire County Council?

40. As part of the Local Development Plan Review process, consideration of the advantages and disadvantages of preparing a joint Local Development Plan with Pembrokeshire County Council is required. This has been fully considered in the

Stage (Replacement Plan)	Steps	Completion Target Date & Publications/ Submissions
	<ul style="list-style-type: none"> proposed and recommend changes or improvements. - Equalities Impact Assessment Screening Report 	<ul style="list-style-type: none"> - Engage with stakeholders on Areas of Potential Change until December 2016 - Candidate site selection/Areas of potential change engagement with Town & Community Councils January/February 2017 - Member workshops to February 2017 - Prepare Draft Preferred Strategy documents for NPA Approval for consultation March 2017
<p>Pre-Deposit Consultation (Regulations 15, 16 and 16a¹⁰)</p>	<ul style="list-style-type: none"> - Publish the Preferred Strategy Proposals documents including the Candidate Site Register, Review Report, Background Papers, Equalities Impact Assessment and the Sustainability Appraisal - Statutory Consultation - Consider Responses - Engage with stakeholders if required in light of new evidence - Member workshops - Prepare Initial Consultation Report - Agree Preferred Option/Strategy and Sustainability Appraisal etc. 	<ul style="list-style-type: none"> - Preferred Strategy Proposals documents (see across) & - Sustainability Appraisal Statutory Consultation (6 weeks) April/May 2017 - Publication of the Initial Consultation Report September 2017 as soon as reasonably practicable
<p>Deposit Regulations 17, 18 and 19)</p>	<ul style="list-style-type: none"> - Review more detailed policies for the Deposit Plan not included at Preferred Strategy stage. - Review Sustainability Appraisal of Deposit Local Development Plan policies. - Review and update 1st 	<p>Finalise Deposit Plan documents for approval for consultation March 2018</p> <p>Statutory consultation (6 weeks) April/May 2018</p>

¹⁰ Regulation 16A added under the Town and Country Planning (Local Development Plan) (Wales) (Amendment) Regulations 2015

Stage (Replacement Plan)	Steps	Completion Target Date & Publications/ Submissions
	<ul style="list-style-type: none"> Plan Habitats Regulations Assessment Screening - Review and update 1st Plan Habitats Regulations Assessment - Review and update the Preferred Strategy Equalities Impact Assessment - Engage with relevant stakeholders - Member workshops - Statutory consultation 	
Submission to Welsh Government for Examination (Regulation 22)	<ul style="list-style-type: none"> - Evaluate the representations submitted - Reconsider Delivery Agreement timetable; submit definitive timings for remaining stages - Submit Documentation 	Member Workshop Agree Submission Documentation National Park Authority September <u>December 2018</u> ¹¹
Independent Examination (Regulation 23)	<ul style="list-style-type: none"> - Test of soundness of the Plan 	<u>Hearing Sessions</u> Spring 2019 Inquiry Library Statements of Case
Publication of the Inspector's Report (Regulation 243)	-	Autumn <u>by December</u> 2019 Inspectors Report
Adoption (Regulation 25)	<ul style="list-style-type: none"> - Making the Plan operational within 8 weeks of receiving the Inspector's Report. 	End of 2019/New Year 2020 Publicise the adopted plan
Sustainability Appraisal Report and Post Adoption Statement	<ul style="list-style-type: none"> - Revise the Sustainability Appraisal <u>Report</u> to take account of changes following Independent examination. - When the Local Development Plan is adopted publish <u>as soon as practicable a</u> statement of how sustainability issues have been taken into account. 	<u>End of New Year/New Year 2020</u> Publicise the final Sustainability Appraisal <u>Report</u> alongside the adopted plan.
Monitoring and Review (Regulation 37)	<ul style="list-style-type: none"> - <i>Monitor the achievement of targets and any significant environmental effects of the Plan's implementation and review Plan as necessary.</i> 	Annually Annual Monitoring Report

¹¹ 2 years and ~~3-6~~ months to submission. The Inspectorate historically committed to providing an Inspector's Report by 1 year from submission.

44. The Authority has followed the Welsh Government's guidance by estimating a four year timetable for the preparation of the Local Development Plan and considerably less than 4 years anticipated for a replacement plan.¹²

Consultation/Notification methods for each key stage of preparation

<u>Consultation/Notification Stage (Replacement Plan)</u>	<u>Method</u>
<u>Publication of the Review Report, Delivery Agreement and Sustainability Appraisal</u>	<ul style="list-style-type: none"> - <u>Website</u> - <u>Written notification by email/letter to mailing list consultees (including those listed in Appendix 4)</u> - <u>Press release in the Pembrokeshire Herald</u> - <u>CDs available for inspection at National Park Office, National Park Visitor Information Centres and public libraries¹³</u>
<u>Invite Candidate Site Submissions</u>	<ul style="list-style-type: none"> - <u>Website</u> - <u>Written notification by email/letter to mailing list consultees (including those listed in Appendix 4)</u> - <u>Press release in the Pembrokeshire Herald</u>
<u>Preferred Strategy Consultation</u> <u>Deposit Plan Consultation</u> <u>Submission to Welsh Government for Examination</u> <u>Publication of the Inspector's Report</u> <u>Adoption</u>	<ul style="list-style-type: none"> - <u>Website</u> - <u>Written notification by email/letter to mailing list consultees (including those listed in Appendix 4)</u> - <u>Press release in the Pembrokeshire Herald</u> - <u>CDs available for inspection at National Park Office, National Park Visitor Information Centres and public libraries¹⁴</u>

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What resources is the National Park Authority committing to this?

Development Plan staff

45. Responsibility for the Local Development Plan lies with the Park Direction Service. There are two planners in the team and a Research and Sustainability Officer. The Head of Park Direction Service and the Director of Planning are also planners. They have the support of an administrative support officer.

¹² Paragraph 10.2.5 Local Development Plan Manual Edition 2 August 2015

¹³ The National Park Office is in, Pembroke Dock. Visitor Information Centres are in Tenby, Newport and St Davids. Public libraries included are Cardigan, Crymch, Fishguard, Haverfordwest, Milford Haven, Narberth, Newport, Neyland, Pembroke, Pembroke Dock, Saundersfoot, St Clears, St Davids, Tenby

¹⁴ The National Park Office is in, Pembroke Dock. Visitor Information Centres are in Tenby, Newport and St Davids. Public libraries included are Cardigan, Crymch, Fishguard, Haverfordwest, Milford Haven, Narberth, Newport, Neyland, Pembroke, Pembroke Dock, Saundersfoot, St Clears, St Davids, Tenby