

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 note two documents, the draft Review Report and the draft Delivery Agreement attached, that will be circulated more widely for comment and input. Officers anticipate final approval of both documents by the National Park Authority at either the June or July 2016 National Park Authority meeting.

Background

2. Members have had an opportunity to contribute to the drafting of the Review Report through workshops carried out and have had the opportunity to provide comment on a first draft of the Report. Thank you to those that provided comment. Amendments have been made to the attached draft. Wider consultation was also undertaken with some stakeholders and comments were received from Welsh Government, Welsh Water and Natural Resources Wales. Amendments have also been made in response to comments made here. The Review Report sets out in more detail the engagement and preparatory work undertaken when drafting the report.
3. With regard to the Delivery Agreement it was anticipated that its preparation would follow the Review Report drafting. However Welsh Government has asked that consultation on the Delivery Agreement should be at the same time as the Review Report. Officers have therefore fast tracked the Delivery Agreement preparation and an initial draft is attached.
4. Members will be given an outline of the Delivery Agreement's content this afternoon and an opportunity to comment.

Financial considerations

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

Risk considerations

6. Progressing Local Development Plan review is a statutory requirement. The approach outlined above 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

7. 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

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

Next Steps

10. It is proposed that both documents are circulated for comment with the intention of reporting to a Local Development Plan workshop following the engagement and consultation exercises.
11. A report of consultations for each exercise will be shared with Members at the Local Development Plan workshop and at a National Park Authority meeting at either the June or July meeting where final approval of both documents will be sought. Welsh Government will then be provided a copy of the Delivery Report for agreement.
12. The Review Report will be part of the documentation required as part of the Deposit and Submission package.
13. 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 agree the above approach (the Next Steps paragraphs) to progressing the attached Pembrokeshire Coast National Park Local Development Plan Review Report and the Delivery Agreement.**

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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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 2016

PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY

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A Aim of this Report

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. This was published in August 2015. The compilation of this report and updating of the supporting evidence is the first stage of that process.
2. The Review Report sets out areas where the Plan is delivering, areas where it needs to change and why, the key issues and the impact on the strategy, policies, sites and their interrelationship. A replacement Plan will be prepared. As progress through the Plan Revision is made this interrelationship will be further explored and developed as proposed changes are identified and their sustainability credentials assessed.
3. The Review Report also sets out the evidence base that has been considered by summarising;
 - the key findings in the published [Annual Monitoring Reports](#) (including issues arising from Sustainability Appraisal monitoring);
 - Evidence gathered through updated [survey evidence](#) and pertinent contextual indicators, including relevant changes to national policy.
4. The evidence base has been assessed against the tests of soundness. Evidence will be updated and amended as needed as the replacement Plan progresses to adoption. The [Evidence Base Sensitivities Background Paper](#) highlights where further elements of the evidence base may change or be updated through the revision process.
5. The Review Report is required not to detail changes that may be made to the Plan so that it does not pre-empt the outcome of the revised Plan.
6. The Review Report concludes that a full revision of the Local Development Plan is required and sets out the procedure that the Authority intends to follow.

7. The engagement with other bodies and organisations the Authority undertook preparing this Report is also set out.
8. Sustainability Appraisal implications will be identified alongside any proposed policy changes at a later stage. At present the Review Report can only identify areas of change rather than how the Plan will be changed. Therefore the sustainability appraisal implications cannot be identified in any meaningful way.
9. When preparing or revising a Local Development Plan the National Park Authority must ensure that the Plan is prepared correctly and it meets the 3 tests of soundness¹:
 - 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?)

Where change is identified the reasons for it include reference to the most pertinent soundness test/s that has informed the need for change.²
10. Finally, the Report sets out the next steps in preparing a replacement Local Development Plan.
11. 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.

¹ In order to be adopted, a Local Development Plan must be determined 'sound' by the examination Inspector (Section 64 of the 2004 Planning and Compulsory Purchase Act). Tests of soundness and checks are identified in Planning Policy Wales Edition 8, January 2016, Chapter 2 and the Local Development Plan Manual Chapter 8.

² Local Development Plan Manual Edition 2 August 2015: <http://gov.wales/topics/planning/policy/policy-and-guidance-on-development-plans/ldpmanual/?lang=en>

B How this Report was prepared

12. The report was prepared by:

- Reviewing the Plan's evidence base (Background Papers, Research Reports commissioned etc.) See Authority's [website](#).
- Carrying out a series of workshops with the Authority's Members
- Reviewing National Planning Policy changes
- Considering contextual changes, for example more recently adopted neighbouring Local Development Plans
- Reviewing the Annual Monitoring Reports prepared between 2011 and 2015. See Authority's [website](#).
- Input from various stakeholders in relation to the above – further detail is provided below.

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 officers³ 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 ▪ Opportunity to comment on draft Review Report
Dŵr Cymru/Welsh	<ul style="list-style-type: none"> ▪ Direct contact with relevant officers for

³ This includes Officers with responsibilities for: Development Planning, Highway Authority, Economic Development, Housing, Drainage and Coastal Defences, Community Facilities, Waste.

Who?	How?
Water	<ul style="list-style-type: none"> ▪ 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 Review
Public Consultation	<ul style="list-style-type: none"> ▪ Formal public consultation on Annual Monitoring Reports.

C Does the Local Development Plan need to be reviewed?

13. Yes it does need to be reviewed for the following reasons:

- Section 69 of the 2004 Planning and Compulsory Purchase Act requires a full review of the Local Development Plan at least every 4 years.
- The Local Development Plan monitoring and review section proposes a full review of the Plan at the end of the financial year 2014-2015.⁴
- The findings of the [Annual Monitoring Reports](#) for the periods Sept 2010 to March 2011, April 2012 to March 2013, April 2013 to March 2014 and April 2014 to March 2015 along with a full review of the Local Development Plan's original evidence ([Background Papers](#)) have been taken into account in producing this publication. They identify areas fundamental to the overall strategy where the Plan is not delivering as satisfactorily as was envisaged by the Authority.

14. For these reasons it is concluded that a full revision of the Plan is appropriate (rather than a short-form procedure which allows consideration of distinct parts of the Plan).

15. The Authority has engaged with other organisations, bodies and individuals to update the background evidence of the Plan and prepare this Review Report. Table 1 above sets out the main ways in which others have been engaged with the process to date.

16. A Delivery Agreement is also being prepared which will provide details of the way in which the Authority proposes to involve the local community and other stakeholders in the preparation of the replacement Local Development Plan. It will provide details of the stages of work and when and how different groups, organisations and individuals can participate. It will also set out a timetable detailing how long each stage is anticipated to take and how much time will be provided for formal public consultation. The main stages of the process are set out below:

⁴ The Planning and Compulsory Purchase Act 2004, Chapter 5, Part 6, Wales, Plans Section 69 advises that a local planning authority must carry out a review of their local development plan at such times as the assembly prescribes. Section 70 (2) (b) advises that the authority must prepare a revision of a local development plan if, following a review under Section 69, they think that the plan should be revised. The Welsh Statutory Instrument 2005 No.2839 The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 Section 41 requires a local planning authority to commence a full review of its Local Development Plan every four years from the date of its initial adoption.

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Table 2 Main Stages of Plan Preparation

Stage	Main purpose
We are here → 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.

D What do the Annual Monitoring Reports tell us?

Key Findings

17. The Authority has prepared four [Annual Monitoring Reports](#) since the Local Development Plan was adopted in 2010.
18. These monitoring reports assess the extent to which the Local Development Plan strategy policies and sites are being delivered. Key findings are set out at the beginning of each Report.
19. Taking account of all four annual monitoring reports below is a summary of areas where the Plan is delivering and also where the Plan is not delivering.
20. The Plan identifies 17 key outcomes to be achieved by the end of the Plan period (i.e. 2021). Thirty-seven indicators and targets are grouped beneath these outcomes to test the performance of the Plan.

Table 3: Extract from 2015 Local Development Plan Annual Monitoring Report⁵

Target	Number of Indicators	
Targets / objectives are being achieved.	31	
Targets have not been achieved or poor performance, but no concerns over implementation of policy / objectives - see below for a summary of the issues.	2	
Monitoring indicates area of concern over implementation of policy / objectives.	4	

21. Details are provided on performance to date under each of the outcomes below.
22. In summary for the 2015 Annual Monitoring Report 31 of the Plan's 37 targets and objectives are being met. There are issues with 6, some of which are fundamental to the delivery of the Local Development Plan. These are housing and affordable housing delivery, and the delivery of other land allocations. The year the issue first emerges in the relevant Annual Monitoring Report is also identified. Issues from all Monitoring Reports are therefore included in the analysis below.

⁵ Issues highlighted in the four Annual Monitoring Reports that require action through a revision of the Plan are identified.
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23. The first part of this chapter provides a summary of the areas of achievement and underperformance. The second part provides further detail on where the Local Development Plan is not delivering. Commentary and action points both in the interim and for revision stage are provided for those that are underperforming.

Performance measured against indicators

24. The Local Development Plan sets out a Vision and Objectives to be achieved by the end date of the Plan (currently 2021). The key outcomes for each section of the Plan are set out below, followed by a table identifying indicators with targets to achieve which together are a means of measuring the effects of strategies and policies contained in the Plan. From the following series of tables it is possible to identify which aspects of the Plan are on target and which need to be reassessed through the revision process.

National Park Purposes & Duty and the Spatial Strategy

Plan Outcomes

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

Table 4 Performance for Purposes, Duty and Strategy

Policy Area	Indicator	Target	Performance	Commentary
All	1: Approvals contrary to recommendation	0		Target has been met and there is no concern over the implementation of this policy.
National Park Purpose and Duty	2: Developments which engage the Sandiford Principle – where conflict between the 2 National Park Purposes becomes acute, the first must prevail. Carrying out the socio-economic duty must be in pursuance of the purposes to Policy 1.	0		Target has been met and there is no concern over the implementation of this policy.
Visitor Economy	3a: Prioritising affordable housing over self-catering development in certain circumstances.	Approval of 2 applications contrary to Policy 35c in any one year		Target has been met and there is no concern over the implementation of this policy.
Employment and housing	3b: The need to prioritise community uses or	0		Target has been met and there is no concern over the implementation of this

	affordable housing when re-using employment sites for other uses.			policy.
Spatial strategy – town to countryside	4: Effectiveness of policies 2 to 7 when used at appeal.	Inspector does not raise issues regarding the effectiveness of the policies or supporting supplementary planning guidance.		Target has been met. (Development in the countryside is considered against the ability to access the site without use of a private car, detailed in Supplementary Planning Guidance in Accessibility. The approach is proving challenging to operate and will be considered as part of the Revision process. (Further detail is set out in Section F).)

Special Qualities

Plan Outcomes

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

Table 5 Performance for Special Qualities

Policy Area	Indicator	Target	Performance	Commentary
Special qualities	5: Approvals contrary to strategy policy 8, Special Qualities.	0		Target has been met and there is no concern over the implementation of this policy.
Policies 1 and 8 to 18 and Supplementary Planning Guidance	6: Effectiveness of Policies 1 and 8 to 18 and Supplementary Planning Guidance on: Landscape character, Conservation Area Proposals, Regionally Important Geodiversity Sites and Historic Environment – when dealing with applications at appeal.	Inspector does not raise issues regarding the effectiveness of the policies or supporting supplementary planning guidance.		Target has been met and there is no concern over the implementation of these policies.

Major Development and the potential for growth

Outcomes

- a) No new major development in the National Park unless there are exceptional circumstances.
- b) The provision of waste facilities to cater for National Park-generated needs or to work with the County Council to provide waste facilities serving both areas outside the National Park.

Table 6 Performance for Major Development and the potential for growth

Policy Area	Indicator	Target	Performance	Commentary
Major development	7: Major development applications only permitted which meet the national planning policy tests.	0		Target has been met and there is no concern over the implementation of this policy.
Minerals	8: Applications for new minerals sites only granted where they meet national planning policy tests.	0		Target has been met and there is no concern over the implementation of this policy.
Waste	33: Amount of waste management capacity permitted expressed as a percentage of total capacity required, as identified in the Regional Waste Plan.	1.5 hectares or 100% (if not provided for outside the National Park in conjunction with Pembrokeshire County Council.		Target has been met and there is no concern over the implementation of this policy.
Major development	9: Effectiveness of policies 19 to 28 and Supplementary Planning Guidance on Land instability from coal workings and Safeguarding minerals - when dealing with applications at appeal.	Inspector does not raise issues regarding the effectiveness of the policies or supporting supplementary planning guidance.		Target has been met and there is no concern over the implementation of these policies.

Climate Change, sustainable design, flooding, sustainable energy

Outcomes

- a) Development achieving high standards in terms of sustainable design with all new dwellings meeting the standards set out in national planning policy.
- b) The National Park contributing to renewable energy generation.
- c) No vulnerable development⁶ in areas which would be at risk of flooding both now and in the long term and with no negative impacts elsewhere.

⁶ 'Vulnerable developments' are defined in the Technical Advice Note 15: Development and Flood Risk on flooding, please see Figure 2 page 7: [http://new.wales.gov.uk/docrepos/40382/epc/planning/403821/40382/403821/\(560\)_july04-tan15-e.pdf?lang=en](http://new.wales.gov.uk/docrepos/40382/epc/planning/403821/40382/403821/(560)_july04-tan15-e.pdf?lang=en)

Table 7 Performance for Climate Change, sustainable design, flooding, sustainable energy

Policy Area	Indicator	Target	Performance	Commentary
Renewable energy	12a: Capacity of renewable energy schemes permitted and completed.	Planning permissions to contribute to an overall target for the National Park of 4.91GWh.		Target has been met and there is no concern over the implementation of this policy. The Authority's policy on permitting renewable energy schemes is achieving its target for renewable electricity generation and ensuring that proposals are consistent with the Authority's guidance on renewables.
Renewable energy	12b: The achievement of renewable heat targets.	Planning permissions to contribute to an overall Renewable Heat Target for the National Park of 26GWh.	Annual Monitoring Report 2012	Target has not been met primarily due to the substantial contribution that biomass was expected to make not being able to be counted in the figures as it generally enjoys permitted development rights. The implication that the policy is performing well and only the indicator target needs to change
Renewable energy guidance	12c: Supplementary planning guidance on: Renewable Energy and Cumulative Impact of Wind Turbines on Landscape and Visual Amenity	All decision-making is consistent with this guidance		Target has been met and there is no concern over the implementation of this policy.
Flooding	13: Amount of development permitted in floodplain areas not meeting TAN15 tests.	Development is not permitted where the long-term scenario would fail the TAN15 tests.		Target has been met and there is no concern over the implementation of this policy.
Previously developed land	14: Percentage of development permitted on previously developed land.	33% of the housing land supply on previously developed land. 45% of the employment land on previously developed land.		Target has been met for housing and employment developments and there is no concern over the implementation of this policy. The Plan is ahead of target for both uses.
Climate change, sustainable design, flooding and sustainable energy	15: Effectiveness of policies 29-34 and Supplementary Planning Guidance (Sustainable Design Guidance, Renewable Energy) at appeals and when dealing with applications at appeal.	Inspector does not raise issues regarding the effectiveness of the policies or supporting supplementary planning guidance.		Target has been met and there is no concern over the implementation of these policies.

Visitor Economy, employment and rural diversification

Outcomes

- a) New employment, live/work and mixed use sites provided (estimated 5.6 hectares) and existing sites safeguarded.

- b) A range of holiday accommodation is available to meet the varying needs of visitors.
- c) Recreational and visitor activities do not damage the special qualities of the National Park

Table 8 Performance for Visitor Economy, employment and rural diversification

Policy Area	Indicator	Target	Performance	Commentary
Employment sites	17: Loss of employment sites	0 approvals, except where justified within the terms of the policy.		Target has been met and there is no concern over the implementation of this policy.
Visitor accommodation	18: Maintaining current levels of holiday accommodation except where justification is proven.	Maintain current levels except where change is proven.		Target has been met. The long-standing policy of restraint on caravan and camping sites is being increasingly tested by unauthorised development gaining certificate of lawful use. A study has been undertaken to assess the capacity of the National Park landscape to absorb further development of this type. There is also increasing demand for new and extended sites.
Special qualities	19: Proposals for recreational activity contrary to Policy 8.	0 approvals		Target has been met and there is no concern over the implementation of this policy.
Visitor economy, employment and rural diversification	20: Effectiveness of policies 35 to 43 and Supplementary Planning Guidance on Recreational Activities and Loss of Hotels when dealing with applications at appeals.	Inspector does not raise issues regarding the effectiveness of the policies or supporting supplementary planning guidance.		Target has been met and there is no concern over the implementation of these policies.

Affordable housing and housing growth

Outcomes

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

Table 9 Performance for Affordable Housing and Housing Growth

Policy Area	Indicator	Target	Performance	Commentary
Housing	21: The housing land supply taken from the current Housing Land Availability Study.	Minimum 5 years supply	Annual Monitoring Report 2012	The Authority has not achieved a 5-year land supply since the Local Development Plan was adopted and the continuing drop in supply is caused by a variety of factors, the most common being a lack of interest by landowners to develop their land allocations in the short and medium term. The Authority will need to revise the housing land allocations.
Housing	22: The number of net additional affordable and general market dwellings built.	530 affordable dwellings over the Plan period. 1000 general market dwellings built, In total a completion rate of 90 per annum	Annual Monitoring Report 2012	Whilst interest in developing sites allocated in the Plan has increased significantly in recent times, along with an increase in development of sites coming forward as small-scale, speculative proposals, this has not been sufficient to make up for poor completion rates at the beginning of the Plan period. The Authority will need to revise the housing land supply to ensure there is sufficient to meet the new Plan timescale (2031).
Delivery of site allocations	23: Amount of development, including housing, permitted on allocated sites in the Plan as a percentage of Plan allocations and a percentage of total development permitted.	Allocations – 100% by the end of the Plan period on allocated sites.	Housing (a) ⁷ Employment /Mixed use (b) ⁸ Community Facilities (c) Road and Cycle Schemes (d) ⁹	The low rate of development on housing and employment/mixed use sites to date will need to be addressed through the Plan Revision as set out above. The road and cycle schemes are listed in the Plan and are proposals of other authorities or bodies. Some of these schemes have become outdated or have been superseded. This will require updating in the Revised Plan.
Housing density	24: Average density of housing development permitted on Development Plan sites.	30 per hectare in the Plan Centres.		Target has been met and there is no concern over the implementation of this policy.
Affordable housing and housing growth	25: Effectiveness of policies 44 to 47 and Supplementary Planning Guidance on Affordable Housing and Low Impact Development when dealing with applications at appeals.	Inspector does not raise issues regarding the effectiveness of the policies or supporting supplementary planning guidance.		Target has been met. Issues relating the effectiveness of this part of the Plan are detailed above.

⁷ Annual Monitoring Report 2014

⁸ Annual Monitoring Report 2014

⁹ Annual Monitoring Report 2014

Community Facilities, Retailing and Transport

Outcomes

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

Table 10 Community Facilities, Retailing and Transport

Policy Area	Indicator	Target	Performance	Commentary
Community facilities	26: Number of approvals for loss of community facilities.	0 unless justified by policy framework		Target has been met and there is no concern over the implementation of this policy.
Community facilities	27: Number of planning obligations for community facilities secured from development.	S106 Agreements secured in line with Supplementary Planning Guidance		Target has been met and there is no concern over the implementation of this policy.
Greenfield land and open space	28: Amount of greenfield land and open space lost to development which is not allocated in the Plan.	Greenfield land – 0%, except for affordable housing or community facility provision. Open space – 0%, unless justified by policy framework.		Target has been met and there is no concern over the implementation of this policy.
Retail	30: Percentage of vacant retail floor space.	No greater than 10%		Target has been met and there is no concern over the implementation of this policy.
Transport	31: Approvals for development without providing access for vehicles, cyclists and pedestrians.	0		Target has been met and there is no concern over the implementation of this policy.
Transport impacts	32: Approvals for development causing significant concerns regarding potential transport impacts.	0		Target has been met and there is no concern over the implementation of this policy.
Community facilities, retailing and transport	34: Effectiveness of policies 48 to 56 and Supplementary Planning Guidance on Planning Obligations when dealing with applications at appeal.	Inspector does not raise issues regarding the effectiveness of the policies or supporting supplementary planning guidance.		Target has been met and there is no concern over the implementation of these policies.

Areas of the Plan that are not working well

25. This section sets out in greater detail where issues of underperformance have been identified through the four Annual Monitoring Reports as summarised above. The issue that needs to be addressed is identified along with the Plan elements likely to be affected and how the need to address the specific soundness tests has helped inform the need for change.
26. For predominantly rural areas, the spatial scale of individual areas of change is unlikely to be significant. For these areas there may be scope to consider options for a more generic “rural strategy”. This could consider broad policy options and principles with regard to issues such as affordable housing, village scale allocations, the role and development of market towns, farm diversification, the settlement hierarchy and roles in terms of service provision, and so on.¹⁰ This is the approach taken when drafting the adopted Local Development Plan and the National Park Authority will continue with this approach through Plan revision.

Housing Land Supply

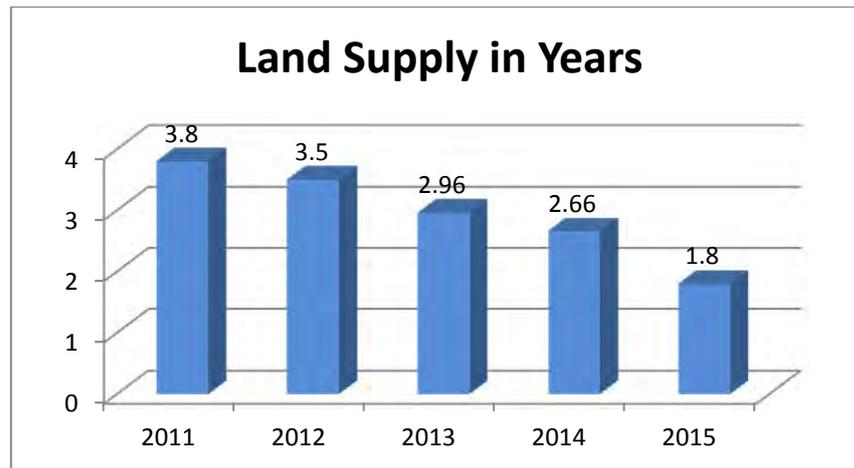
27. The Authority is required to demonstrate a five year effectively available housing land supply. The methodology used to calculate the supply is the ‘residual method’.

Table 11 Residual Method

THE RESIDUAL METHOD	
a.	Using the number of houses needed over the Plan period (identified in the Local Development Plan);
b.	Subtract the number of houses which have already been built;
c.	Divide the remaining number by the number of years the Plan has left to run. This gives a yearly requirement;
d.	Multiply the yearly requirement by 5 to give a 5-year requirement;
e.	Work out how many houses could be built within a 5-year period (i.e. no physical constraints and the landowner or developer ready to bring site forward for development);
F.	Divide the supply (E) by the 5-year requirement (D) to give a land supply in years.

28. The following graph shows that the National Park has not had a 5-year land supply since the Plan was adopted in September 2010.

¹⁰ : Local Development Plan Manual August paragraph 6.2.3.4, page 64
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29. The continuing drop in the calculated land supply is caused by a variety of factors, the most common being a lack of interest by landowners in wishing to develop their land in the short and medium term. Whilst interest in developing sites allocated in the Local Development Plan has increased significantly in recent times with a number of pre-application enquiries and planning applications made to the Authority, this has not been sufficient to make up for poor completion rates at the beginning of the Plan period. The Authority produced new Supplementary Planning Guidance on Affordable Housing, to assist with bringing sites forward, in November 2014.

30. The Authority will also need to revise the housing land supply to ensure that the supply is sufficient to meet the new Plan timescale (2031)¹¹, as well as to ensure that there are no fundamental impediments to the development of the sites allocated in the Plan and to be able to specify the timescales within which constraints can be overcome.

How this impacts on the Plan Strategy

31. Low building rates at the start of the current Plan period mean that not all of the land allocated to accommodate new housing development will be used before its end date of 2021, and the targets for affordable housing delivery are not being met.

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. With no reason to allocate housing land to house an increasing population, there nevertheless remains a need to build more affordable houses. The proportion of affordable to market housing needs to better reflect housing requirements in the National Park. Market housing is

¹¹ Please see section 'Is the evidence on which the Local Development Plan is based up to date?' which explains this requirement.

required to help cross-subsidise affordable housing provision as the amount required is much greater than can be provided with public funds alone.

33. A full revision of the Local Development Plan is necessary because the Authority will need to review the housing land supply to ensure that the supply is sufficient to meet the new Plan timescale (2031), that there are no fundamental impediments to the development of the sites allocated in the Plan, and to be able to specify the timescales within which constraints can be overcome. This will necessitate reviewing housing provision figures, preparing a Candidate Site Register and reviewing affordable housing requirements. This has potential implications for many 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	
1	<i>Does the Plan have regard to national policy?</i>
2	<i>Does it seek to meet the assessed needs?</i>
3	<i>Will development be viable?</i>

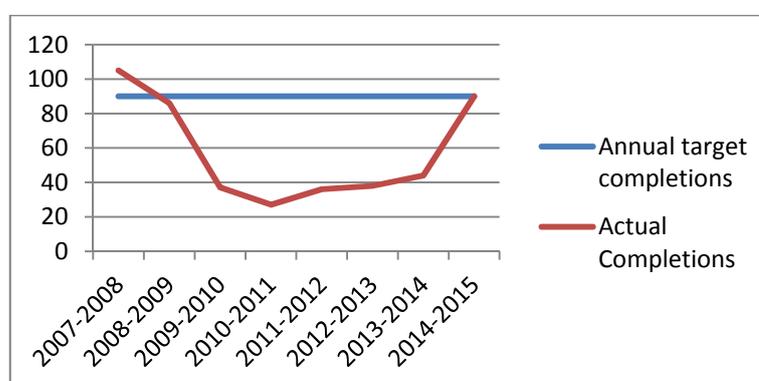
Housing building rates & Local Development Plan targets

34. Between 1999 and 2009 the Plan's completion rate was an average of 89 per annum. It was anticipated that the provision figure of 1,349 would deliver an estimated 90 units per annum over the Plan period with the flexibility of an additional windfall provision of 250. Building rates fluctuate significantly in Pembrokeshire and there has been a considerable drop in completions during the recession. This has improved more recently. These build rates suggest that the development industry in Pembrokeshire is largely responsive to the overall housing market and the economy. Development in Pembrokeshire is largely bespoke rather than speculative. Looking at historic building rates in the National Park a consistent building rate of 90 per annum has never been reached.

Table 12 Housing Delivery 2007 to 2015

	Target Annual Completions	Completions Recorded	Target Annual Affordable Completions or u/c ¹²	Affordable Completions or u/c recorded
2007-2008	90	105	28	7
2008-2009	90	86	28	15
2009-2010	90	37	28	12
2010-2011	90	27	28	3
2011-2012	90	36	28	0
2012-2013	90	38	28	0
2013-2014	90	44	28	3
2014-2015	90	90	28	41
Total	720	463	224	81

35. The graph below illustrates the shortfall to date with completions averaging 58 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.

¹² U/C means under construction.

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

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	99	83	65	276	46
Total	1349	245	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 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, 64% 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. 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 implemented. The future of the second allocation 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).

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 	

Table 14 Allocations that include housing

	Location Proposals Map ID	Site Name and Location	Total number of Units¹³
1.	Broad Haven HA734	South of Driftwood Close	10
2.	Broad Haven MA776	Land north east of Marine Road	35
3.	Crymych HA750	Depot Site	18
4.	Dale HA382	Castle Way	12
5.	Dinas Cross HA387	Opposite Bay View Terrace	12
6.	Herbrandston HA732	East of Herbrandston Hall	12
7.	Jameston HA436	North of Landway Farm	6
8.	Jameston HA730	Opposite Bush Terrace	35
9.	Jameston HA821	Green Grove	5
10.	Lawrenny HA559	Adj Home Farm	30
11.	Manorbier Station HA848	Field opp Manorbier VC School	19
12.	Manorbier Station MA895	Land part of Buttylands	15
13.	New Hedges HA813	Rear of Cross Park	31
14.	Newport HA825	North of Feidr Eglwys	20
15.	Saundersfoot MA777	Rear of Cambrian Hotel, Saundersfoot	28
16.	Solva HA384	Adj Bro Dawel	18
17.	Solva HA792	Bank House, Whitchurch Lane	12
18.	St David's HA385	North of Twr-y-Felin	13
19.	St Davids HA737	West of Glasfryn Rd	90
20.	St David's HA789	Adj Ysgol Bro Dewi, Nun Street	10
21.	St Ishmaels MA733	Adj School	40
22.	Tenby HA377	Brynhir	168
23.	Tenby HA723	former cottage Hospital Site	10
24.	Tenby HA724	Rectory Car Park	50
25.	Tenby HA727	West of Narberth Road	25
26.	Tenby HA752	Butts Field Car park, Tenby	80
27.	Tenby HA760	Reservoir Site, Tenby	12
28.	Tenby MA706	Upper Park Road, Tenby	14
29.	Tenby MA707	White Lion St/Deer Park, Tenby	48
30.	Tenby MA710	Sergeants Lane, Tenby	5

¹³Reflects number of units granted planning permission as at April 2015
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	Location Proposals Map ID	Site Name and Location	Total number of Units ¹³
31.	Trefin HA738	North of Heol Crwys	15
	Total		898

Key to Tables 15, 16 and 17

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

Table 15 Allocations of Employment/Mixed Use Sites (not included in Table 14)

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.

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.

Scheme Number	Road/Cycle Schemes	Monitoring
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.

How this impacts on the Plan Strategy

52. A revision of the housing land/employment/mixed use allocations identified in the Local Development Plan will be undertaken. A full revision of the Local Development Plan is necessary because the Authority will need to review the housing land supply to ensure that the supply is sufficient to meet the new Plan timescale (2031), that there are no fundamental impediments to the development of the sites allocated in the Plan, and to be able to specify the timescales within which constraints can be overcome. This will necessitate reviewing housing provision figures, preparing a Candidate Site Register and reviewing affordable housing requirements. This has potential implications for many Centres identified in the National Park and therefore a full rather than partial revision is needed.

53. The allocation for community facilities at Saundersfoot Railway Station will also be revised as part of the Local Development Plan revision. The highway and cycle schemes listed in Table 10 of the Local Development Plan also require revision and updating for the Plan period to 2031. (See [Sustainable Transport Background Paper](#))

These changes are necessary in order to address the following Soundness Tests	
3	<i>Can the sites allocated be delivered?</i>

Phasing of housing allocations

54. Phasing of housing and mixed use sites is included in the Local Development Plan (see paragraph 4.209, Table 8 and Appendix 2 of the Local Development Plan. This was done primarily to take account of the need to improve infrastructure or to assist in the absorption of development into Centres.

55. Continuing to include a phasing constraint is considered difficult to justify as the development industry will take account of programmed infrastructure improvements and how to provide supply to match demand when bringing sites forward. As a result it is proposed to review the phasing constraint contained in the Local Development Plan. See [Housing Background Paper](#).

How this impacts on the Plan Strategy

56. This in itself is unlikely to impact on the Plan strategy given the rate of development generally in Pembrokeshire.

These changes are necessary in order to address the following Soundness Tests	
2	<i>Can the rationale behind the policy be demonstrated?</i>
3	<i>Can the Plan be implemented?</i>

Sustainable Design Indicator

57. **Policy 29 Sustainable Design:** That element of the policy which required energy efficiency improvements being sought in the original building as well as a proposed extension has not proved workable and is no longer being implemented by the Authority. It requires deletion from the Plan when revised. ([Annual Monitoring Report 2012](#) refers).

How this impacts on the Plan Strategy

58. This in itself will not impact significantly on the Plan strategy.

These changes are necessary in order to address the following Soundness Tests	
1	<i>Does it have regard to national planning policy?</i>
3	<i>Can it be implemented?</i>

E Is the evidence on which the Local Development Plan based up to date?

59. An important consideration in determining whether the evidence is up to date is the fact that Local Development Plans are required to have an operational life once adopted of at least 10 years.¹⁴ It is important that the new need, due to the longer timescale, is identified and addressed. The current Local Development Plan runs until 2021 and a new end date is therefore necessary to comply with national guidance (i.e. 2031).
60. The Authority has undertaken a review of the evidence to ensure that it is up to date wherever feasible. See [Background Paper Evidence Base](#). It is accompanied by a commentary on any time-sensitive issues and a commentary on how the Authority will seek to address this issue where and when it arises.
61. In summary:
- There are elements of evidence that will continue to be provided and updated (for example national planning policy) as the Plan progresses and these issues will need to be addressed at the time they arise. Details are provided in the above Background Paper.
 - There is further evidence required that the Authority will need to provide, namely:
 - i. Affordable Housing Delivery Report (Housing Market Area figures) to be prepared prior to Preferred Strategy consultation stage. This will identify affordable housing requirements for sub areas of the Plan.
 - ii. Alternative Options Paper. This will explore options for change and will be first published alongside the Preferred Strategy.
 - iii. Candidate Site Background Paper & Register to be published prior to the Preferred Strategy Stage. This will provide the selection criteria for sites and an opportunity to submit sites.
 - iv. Employment Land Survey (Pembrokeshire) prior to publishing the Preferred Strategy. To assist in considering policy options for employment.

¹⁴ Page 120 Local Development Plan Manual Edition 2 August 2015
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- v. Land Allocation Implementation Study (update) – including affordable housing viability tests. Needed to advise on deliverability of sites allocated in the Plan. To be published alongside the Deposit Local Development Plan.
- vi. Open Space Assessment 2015. This assessment will advise on the adequacy of existing supply. To be published alongside the Local Development Plan’s Preferred Strategy.
- vii. Pembrokeshire Coast National Park Settlement Study 2007 - Update for new Rural Centres. Publish alongside the Local Development Plan’s Preferred Strategy.
- viii. Regional Retail Study. To be published alongside the Local Development Plan’s Preferred Strategy. The Study will advise on the any requirements to update the Plan’s retail policy framework.

62. Generally as the Plan progresses new information will mean updates are likely to occur and any implications for Plan revision will need to be addressed.

63. Not all components of the evidence base are out of date. Whilst full revision will look at the Local Development Plan afresh, the National Park Authority considers that some of its original evidence remains sound.

64. **Rural Centres (Tier 4) Policy 6 (Strategy Policy):** In anticipation of Local Development Plan revision, the population (2011 Census estimate), the facilities available¹⁵, accessibility¹⁶, water supply and sewerage availability for towns and villages around the National Park have been checked. The update will mean that new Inset Maps for Centres will be added. Policy 6 will require revision to add new Centres. (See [Scale and Location of Growth Background Paper](#))

65. This will necessitate an updating of Policy 6 to include/delete these Centres, and the Proposals Map to include and delete Inset Plans at Deposit Stage.

66. Please see [Scale and Location of Growth Background Paper](#).

These changes are necessary in order to address the following Soundness Tests	
2	<i>Is the Plan supported by robust and credible evidence?</i>

¹⁵ which have at least 3 facilities normally found in a small village or if less than this, at least 1 convenience shop

¹⁶ This relates the extent to which a locality or facility is readily approachable and usable by as many people as possible, including individuals with disabilities.

67. Targets for Renewable Energy: The targets for the renewable electricity generation and renewable heat generation for Policy 33 Renewable Energy (Strategy Policy) as set out in the Policy’s reasoned justification and in Appendix 4 of the Local Development Plan were derived from a study entitled ‘Development of a Renewable Energy Assessment and Target Information for the Pembrokeshire Coast Local Development Plan’ (2008). This study considered the potential capacity for various types of renewable electricity and heat production technologies in the context of the National Park landscape, their economic potential and likely uptake, the potential for community based schemes and the limitations and opportunities of the electricity distribution network. Based on this information the study provided contribution estimates for each technology up to 2021 (Indicators 12a and 12b represent the total estimates).

68. To inform the Local Development Plan Revision and to enable the continued monitoring of policy performance, an update to the study was required to review the uptake of certain technologies, identify technologies where limited further capacity exists, and identify new technologies and to provide a new set of predicted contributions for the revised plan new end date (2031). (Chapter 2 E Climate change, sustainable design, flooding, sustainable energy of the [2015 Annual Monitoring Report](#) and the [Climate Change Background Paper](#) refers.) Please also see [‘Update to the Development of a Renewable Energy Assessment and Target Information for the Pembrokeshire Coast Local Development Plan \(2008\)’ January 2016.](#)

These changes are necessary in order to address the following Soundness Tests	
1	<i>Does the Plan have regard to national policy?</i>
2	<p><i>Does it address key issues?</i></p> <p><i>Is it supported by robust, proportionate and credible evidence?</i></p> <p><i>Can the rationale behind the plan policies be demonstrated?</i></p> <p><i>Does it seek to meet assessed needs and contribute to the achievement of sustainable development?</i></p>

69. Targets for Affordable Housing Delivery: It is intended that the methodology for [the Affordable Housing Delivery Project Report](#) prepared in 2014 will be used to provide proposed percentage requirements for

housing market areas and Centres at Local Development Plan Preferred Strategy stage and to assess the housing allocations proposed at Local Development Plan Deposit Plan stage. See [Housing Background Paper](#).

70. Chalet, Caravan and Camping Sites: There has been a long-held policy of restraint on new chalet, caravan and camping sites in the National Park dating from the Dyfed Structure Plan prepared in the 1970's. Part of the rationale for this approach was the potential impact on the National Park landscape and also knowledge that there were a number of sites in the National Park with some capacity for further development. The latest survey based on 2013/14 shows however, that the available capacity has reduced and this has been coupled with increasing demand for new sites, additional pitches on existing sites and change over from touring/camping pitches to static caravan pitches. The Authority is also receiving regular notifications of sites operating without planning permission. This is testing the current policy position. A consultant was commissioned to assess the capacity of the National Park landscape to absorb additional chalet, caravan and camping sites and pitches. The outcome of the Assessment ([the Caravan, Camping and Chalet Landscape Capacity Assessment](#)), which is published with this Review Report, will be used as a basis for engagement to inform the revision of relevant policies of the Plan and what changes need to be made. (Chapter 2d of the 2015 Monitoring Report refers)

These changes are necessary in order to address the following Soundness Tests	
2	<p><i>Does it address key issues?</i></p> <p><i>Is it supported by robust, proportionate and credible evidence?</i></p> <p><i>Can the rationale behind the plan policies be demonstrated?</i></p> <p><i>Does it seek to meet assessed needs and contribute to the achievement of sustainable development?</i></p>

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	March 2013	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 emerging policies then taking shape for the County Council's Local Development Plan.

78. Discussions have taken place on the way forward for the Pembrokeshire Coast National Park Local Development Plan Review, taking into account the following:

- The Council's Local Development Plan is at a much earlier stage of implementation and through its Annual Monitoring Reports for 2013-14 and 2014-15 has demonstrated effective Plan implementation, with formal / full Plan review not required until 2017;
- The greater costs and longer time-scales of producing a Joint Plan Review, given the need to re-examine all elements of the evidence base;
- The need for the Pembrokeshire Coast National Park Authority to progress quickly with its statutorily required Plan Review, particularly in the context of not being able to demonstrate a five year land supply;
- The swifter progress that a National Park Authority can make with Plan preparation, given its starting point in National Park statutory purposes, in combination with its significantly smaller area (29%) and population base (c20%) and the generally smaller scale of consultation responses than would be the case for the Council's Local Development Plan;
- The mutual benefits (including potential cost savings) of collaboration on joint updates to the evidence base, where appropriate;
- The rationale for policy variation stemming from strategic growth / restraint objectives and the need to reflect National Park purposes;
- The need for Statements of Common Ground to demonstrate cross boundary consistency and compatibility;
- The Review of Designated Landscapes (report 2015)
- The uncertainties associated regarding Local Government Reorganisation, possibly resulting in pressure to prepare composite Local Development Plans for newly formed authorities as soon as possible after reorganisation.

79. Any move to joint plan preparation would require a fundamental reassessment of both strategies, with considerably more work and

supporting evidence required than is otherwise anticipated for individual Plan review. For the Council, an early and unnecessary review of the Plan would incur considerable unnecessary additional cost (additional staff resource) and at the same time would result in unhelpful uncertainty for decision making on planning applications during plan preparation, with the prospect of facing a further early review on Local Government Reorganisation.

80. Given this background, the two Authorities will continue further joint working on an evidence base to support implementation and review of both Authorities Plans.

National Law, Policy and other Local Development Plans

Review of Designated Landscapes

81. On the 29 September 2014 the Minister for Natural Resources commissioned an Independent Panel to conduct a review of designated landscapes in Wales.
82. The review started at the end of 2014 and was conducted in 2 stages. The review panel was chaired by Professor Terry Marsden of Cardiff University with John Lloyd Jones and Dr Ruth Williams as members.
83. The Independent Review of Designated Landscapes in Wales makes 69 recommendations covering a raft of proposals and observations on purposes, principles, vision, governance models, planning, and funding.
84. The recommendations include:
- i. making no change to the name or legal status of national parks or Areas of Outstanding Natural Beauty (AONBs)
 - ii. There should be three interlocking statutory purposes for both the National Parks and AONBs in relations to conservation, physical and mental well-being and sustainable forms of economic and community development.
 - iii. strengthening the support and delivery role of other bodies
 - iv. the creation of a National Landscape Committee.
85. Due to the considerable scale and scope of the recommendations, further work is now needed to understand their potential benefit and their consequences.
86. Lord Dafydd Ellis-Thomas AM will lead a Future Landscapes Working Group, involving representatives of the national parks, Areas of Outstanding Natural Beauty, interest groups, business, and local government to participate.

87. The group will explore these recommendations and report their findings in 2016.
88. Implications arising for preparing the replacement Local Development Plan will be monitored and addressed when required.

Household Growth

89. Welsh Government advises that local planning authorities will need to have a clear understanding of the factors influencing housing requirements in their area over the Plan period. The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment, will form part of the Plan's evidence base

Site Selection

90. The approach to site selection which will be used to assess candidate sites will require revision against changes to paragraph 9.2.9 of Planning Policy Wales Edition 8 January 2016 and the advice contained in the Local Development Plan Manual Edition 2 August 2015. The Authority will need to review the housing land supply to ensure that the supply is sufficient to meet the new Plan timescale (2031), and to ensure that there are no fundamental impediments to the development of the sites allocated in the Plan and to be able to specify the timescales within which constraints can be overcome.
91. The approach to site selection will be published prior to Local Development Plan Preferred Strategy consultation to provide guidance to those submitting candidate sites.

Countryside Policy 7a (infill and rounding off) and 7d (conversion)

92. The introduction of allowing local needs proposals in places that may not be accessible other than by private car means that an update is needed for Policy 7a) and d) of the Plan. The policy does not allow either infill or rounding off or conversion of buildings in inaccessible locations where it is for 'local need'. The local need definition in the adopted Plan at present is for affordable housing. These criteria require revision in relation to Technical Advice Note 6 July 2010, paragraph 2.2.3.

Countryside Policy 7d (conversion)

93. Technical Advice Note 23, February 2014 paragraph 3.2.1 refers to the important role the re-use and adaptation of existing rural buildings play in

meeting the needs of rural areas. The Technical Advice Note refers to addressing traffic impact issues in relation to the scale of activity proposed and overcoming planning permission objections on traffic grounds. Policy 7d) which deals with the conversion of appropriate buildings requires revision in relation to this issue as the Plan's approach seeks to restrict uses dependent on their accessibility by public transport as part of the Plan's spatial strategy.

Farm Diversification

94. Planning Policy Wales 8th Edition January 2016 paragraph 7.5.1 (penultimate bullet) advises of the need to include policies on farm diversification. The adopted Local Development Plan relied on national planning policy. A new policy on farm diversification will be inserted in the replacement Plan. See [Employment Background Paper](#). The Plan's key issue for development in the countryside (page 11), its vision paragraph 3.4 objective on page 16, key outcomes (page 16), National Park in 2021 for the Countryside (paragraph 4.44) remain valid. Policy 7c) Countryside and Policy 42b) Employment Sites/Live Work Units will include a cross reference to the new policy. Paragraph 4.53 of the Local Development Plan will be revised in light of the need to include a new policy.

Waste

95. Welsh Government has recast national planning policy. The principles and policies contained in Planning Policy Wales and Technical Advice Note 21: Waste (2001) have now been revised to set out the strategic and spatial role of land use planning in facilitating these new waste management priorities, objectives and targets. This new policy and guidance will need consideration at Plan revision stage and taken account of in the interim. (Chapter 2B of the 2014 Monitoring Report refers and the [Waste Background Paper](#)) This will primarily mean revising reference to serving only the National Park area to acknowledge the national policy context whereby it would be expected that facilities should predominantly serve the National Park area ([Waste Background Paper](#) refers).

Employment

96. Taking account of recent national planning policy changes a review of the Local Development Plan evidence base will need to be undertaken. The existing evidence base was prepared in full consultation with a variety of stakeholders but in particular Pembrokeshire County Council which provides an economic development role for the whole of Pembrokeshire,

including the National Park. In light of the direction for strategic collaboration between authorities this will need to be considered through discussion with other authorities in the region. Pembrokeshire County Council and the National Park Authority are currently preparing a Pembrokeshire Employment Land Survey which will be published and taken into account prior to publishing the Local Development Plan Preferred Strategy. It is anticipated that output from a more regional strategic collaboration between authorities will be longer term (regional evidence base and regional strategy). (Chapter 2D of the [2014 Monitoring report](#) refers.)

Policy 42 Employment Sites & Live/Work Units criterion b)

97. This requires revision. The revised Chapter 7 of Planning Policy Wales Edition 8 January 2016 and Technical Advice Note 23 February 2014 provides for:

- A sequential approach to employment site selection (first preference to within the boundaries of settlements, second preference edge of settlement and third preference sites in the countryside.) Paragraph 1.2.7 of Technical Advice Note 23 Economic Development (February 2014) applies.
- In making the selection the planning authority should consider jobs, accommodated alternatives available and special merit (Section 2.1 of Technical Advice Note 23 provides a detailed commentary).
- In rural areas there are potentially two additional special contributions; the alignment of jobs and housing and the needs of expanding businesses or those new businesses needing to join an existing cluster. (paragraph 3.13 of Technical Advice Note 23).

98. Chapter 2D of the [2014 Monitoring Report](#) and the [Background Paper on Employment](#) refers.

Contingency

99. A 10% level of contingency provision is generally accepted as providing a reasonable element of flexibility in development plans when tested in current Examinations. Inspectors also take into account the circumstances of individual Plan areas, and Brecon Beacons National Park Inspector's report refers to accepting a lower percentage in view of the possibility that the sites in the Plan may not deliver as anticipated and the impact of allocating additional land in the sensitive landscape of the National Park. The implications of updating the housing provision for the Plan are described in detail earlier in this Report.

These changes are necessary in order to address the following Soundness Tests	
	<i>Is the Plan sufficiently flexible? Are there appropriate contingency provisions?</i>

Constraint Mapping

100. The Local Development Plan Manual (Edition 2 August 2015, page 16) advises that where spatial delineations are determined by mechanisms other than the Local Development Plan they do not need to be shown on the Proposals Map - in these situations the use of a Constraints Map may be beneficial. A Constraints Map can show, for example, spatial delineations determined by TAN15 Development Advice Maps or statutory landscape designations. This may be beneficial in that the map can be amended readily to take account of changes that are not determined by the Local Development Plan. A Constraints Map, unlike the Proposals Map, is not a statutory requirement and is not part of the Local Development Plan. If produced, then its status must be made clear; the Local Development Plan should reference it and list the designations it includes. A Constraints Map will be prepared alongside the replacement Local Development Plan.

Scrutiny Report on Economic Activity

101. A report by the Joint Scrutiny Committee on the impact of the policies and work of the National Park Authorities on economic activity (for Snowdonia & Pembrokeshire National Park Authorities) was agreed by this Authority on the 29th July 2015. The relevant recommendations will be taken into account in the Local Development Plan revision. Chapter 2D of this Monitoring Report refers, as does the [Employment Background Paper](#). The relevant recommendations relate to flexibility and monitoring (both tests of soundness for a Plan) and liaison with the economic development authority. The [Employment Background Paper refers](#).

These changes are necessary in order to address the following Soundness Tests	
2	<i>Does the Plan address key issues?</i>
3	<i>Is the Plan sufficiently flexible? Are there appropriate contingency provisions?</i>

	<i>Is it monitored effectively?</i>
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Accessibility in the Countryside

102. **Policy 7a (infill and rounding off) and Policy 7d (conversion) (Strategy Policy):** The spatial strategy of the Local Development Plan has largely directed new development to identified Centres where there are a range of facilities and services available. Outside the Centres, development is limited to conversion of appropriate buildings or infill and rounding off in groups of buildings. The ability of site users to reach services and facilities by means other than private car is an important consideration in such cases and the Authority's Supplementary Planning Guidance (adopted in June 2013) sets out how this is assessed. The approach to assessing accessibility, on a case-by-case basis using the criteria contained in the guidance, is proving to be challenging in an essentially rural planning authority and planning applications are being decided contrary to recommendation. This issue will be considered as part of the Local Development Plan revision. (Chapter 2 of the 2015 Monitoring Report refers.)

These changes are necessary in order to address the following Soundness Tests	
	<i>Does the Plan address key issues?</i>

Newgale Adaptation Plan

103. Newgale is defined as a Centre in the Local Development Plan with a Centre boundary. Parts of the village close to the shoreline and within the Centre boundary are within a C2 flood zone. A study prepared for Pembrokeshire County Council has highlighted that the current coastal defences have a limited lifespan with consequential effects on the village and main road running along the coast. The advice in Technical Advice Note 15: Flooding will be relevant when considering any proposals within the flood zone area. Vulnerable uses such as housing will not be permitted within the flood zone.
104. The work to assess the need for and establish a route for a new road link at Newgale currently has no timescale. Pembrokeshire County Council are progressing the work using the Welsh Government's approved guidance (WelTAG). It is unlikely that a definitive route will be identified during the Local Development Plan Revision period and so this will need to be considered again in future reviews of the Plan.
105. The replacement Local Development Plan will need to highlight and monitor the issues that are emerging for Newgale.

106. As the Plan will be a replacement Plan each stage of Sustainability Appraisal and Habitats Regulations Assessment preparation will be carried out.
107. The four Annual Monitoring Reports have identified specific issues that require consideration when preparing the replacement Local Development Plan. The [2015 Annual Monitoring Report](#) advises that within the scope of Local Development Plan and its associated supplementary planning guidance documents it is generally contributing positively to sustainability appraisal objectives. However some issues have been identified that may become more significant in the future if they are not monitored and addressed in a sustainable manner. These issues are;
- Changes in approach to development in the countryside Policy 7a Countryside (infill and rounding off) and Policy 7d (conversion).
 - Reducing the opportunities to achieve a more sustainable design in the main house when approving an extension to a building (Policy 29 Sustainable Design).
 - Changes to national planning policy regarding sustainable design provide an opportunity to take a fresh look at indicators and targets under Policy 29 Sustainable Design.
 - A roll forward of the Authority's Renewable Energy Assessment to 2031.
 - The sustainability implications for policy change following preparation of the Caravan, Camping and Chalet Landscape Capacity Assessment.

H Next Steps

108. The Authority will informally¹⁷ consult on the draft Review Report before it is finalised to help inform the scope of change required. The Review Report will also be consulted upon during the first public consultation on the revision of the Local Development Plan.¹⁸
109. The stages of Plan preparation are set out on the Authority's [website](#).
110. As the Plan will be a replacement Plan, it will, in its various forms, will be open to consultation and comment as it progresses to adoption. The areas identified for change by the Authority will not be the only subjects of consultation.
111. Background Papers and evidence published alongside this Review Report help to identify areas of change. The Background Papers and evidence base used to prepare this report is on the Authority's [website](#). They will be updated and amended as needed as the replacement Plan progresses to adoption.
112. An initial draft of the Plan's revised Delivery Agreement will include the timetable for preparing a replacement Plan and methods of engagement to be used. It will be published alongside the Review Report and this will provide an opportunity for informal input and feedback.
113. The preparation of the Sustainability Appraisal Scoping Report which will also be subject to formal consultation.
114. It is the Authority's intention to complete these engagement exercises and approve these documents in June or July 2016.

¹⁷ This is not a statutory requirement but provides an opportunity for early input.

¹⁸ Regulation 15 Consultation Pre-Deposit Consultation on the Preferred Strategy.

The 2004 Act	The Planning and Compulsory Purchase Act 2004.
Annual Monitoring Report (AMR)	This will assess the extent to which policies in the local development plan are being successfully implemented (Regulation 37 of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005.
Baseline	A description of the present state of an area against which to measure change.
Biodiversity Action Plan	A plan that sets objectives and actions for the conservation of biodiversity, with measurable targets, whose aim is to conserve and enhance nature across communities by bringing together all interests by involving sectors such as agriculture and business as well as the communities themselves. Action is developed and taken forward in partnership and in doing so reflects local priorities as well as biodiversity needs.
Candidate Site	Candidate Sites are those nominated by anyone for consideration by the Local Planning Authority as allocations in an emerging Local Development Plan.
Candidate Sites Register	Register of candidate sites prepared following a call for candidate sites by the Local Planning Authority.
Community Infrastructure Levy (CIL)	The Community Infrastructure Levy is a planning charge, introduced by the Planning Act 2008 as a tool for local planning authorities to help deliver infrastructure to support the development of their area. It came into force on 6 April 2010 through the Community Infrastructure Levy Regulations 2010.
Community	People living in a defined geographical area, or who share other interests and therefore form communities of interest.
Community Involvement Scheme (CIS)	Sets out the project plan and policies of the Local Planning Authority for involving local communities, including businesses, in the preparation of local development plans. The Community Involvement Scheme is submitted to the Welsh Government as part of the Delivery Agreement for agreement.
Community Strategy	Required by the Local Government (Wales) Measure 2009 (Part 2: Sections 37-46) with the aim of improving the social, environmental and economic well being of their areas. See "Single Integrated Plan".
Consensus building	A process of early dialogue with targeted interest groups to understand relevant viewpoints and agree a course of action.
Consultation	A formal process in which comments are invited on a particular topic or set of topics, or a draft document.
Consultation Body	An authority with environmental responsibilities concerned by the effects of implementing plans and programmes and which must be consulted under the Strategic Environmental Assessment Regulations; i.e. Natural Resources Wales (NRW) and Cadw.
Consultation exercise	A single consultation project focused on a defined objective and usually part of an overall consultation programme.
Contextual Indicator	An indicator used to monitor changes in the context within which the plan is being implemented.
Delivery Agreement (DA)	A document comprising the Local Planning Authority's timetable for the preparation of the Local Development Plan together with its Community Involvement Scheme, submitted to the Welsh Government for agreement.
Deposit Documents	See "Local Development Plan (or Deposit) Documents".
Development management policies	A suite of criteria-based policies which will ensure that all development within the area meets the aims and objectives set out in the Strategy.

Dialogue methods	Different techniques of interaction that build a continuous dialogue between and among affected groups.
Engagement	A process which encourages substantive deliberation in a community. Proactive attempt to involve any given group of people/section of the community.
Environmental Report	Document required by the Strategic Environmental Assessment Regulations which identifies, describes and appraises the likely significant effects on the environment of implementing the plan, see Sustainability Appraisal Report.
Evidence Base	Interpretation of Baseline or other information/data to provide the basis for plan policy.
Focussed Change (FC)	Changes proposed to the deposit Local Development Plan prior to submission that are extremely limited in number, that reflect key pieces of evidence, but do not go to the heart of the plan.
Habitats Regulations Assessment (HRA)	The screening and appropriate assessment of options required under Part 6 Chapter 8 of the Conservation of Habitats and Species Regulations 2010 (as amended) (the Habitats Regulations) - a recognised iterative process which helps determine the likely significant effect on a plan or programme and (where appropriate) assess adverse impacts on the integrity of a European site. The assessment is required to be undertaken by a competent authority in respect of plans or projects which are likely to have a significant effect (alone and in combination with other plans and projects) on a "European site" (see paragraph 5.1.2 of Technical Advice Note 5), or as a matter of policy a proposed "European site" or Ramsar site, under the provisions of Article 6(3) of the EC Directive 92/43/ECC (the Habitats Directive), regulations 61 and 102 of the Conservation of Habitats and Species Regulations (as amended) 2010, and, regulation 25 of the Offshore Marine Conservation (Natural Habitats &c) Regulations 2007.
Indicator	A measure of variables over time, often used to measure achievement of objectives.
Initial SA Report	A term used in Local Development Plan Wales to refer to the Sustainability Appraisal Report, produced at the Preferred Strategy stage. This assesses the Local Development Plan options against the Sustainability Appraisal framework. The report is then expanded at the Deposit Local Development Plan stage and finalised alongside the Adoption Statement.
Involvement	Generic term to include both participation and consultation techniques.
LANDMAP	LANDMAP is the formally adopted methodology for landscape assessment in Wales; therefore all landscape work and assessments of the effects arising from a proposals impact on the landscape in Wales should include LANDMAP
Local Development Plan (LDP)	The required statutory development plan for each local planning authority area in Wales under Part 6 of the Planning and Compulsory Purchase Act 2004. A land use plan that is subject to independent examination, which will form the statutory development plan for a local planning authority area for the purposes of the Act. It should include a vision, strategy, area-wide policies for development types, land allocations, and where necessary policies and proposals for key areas of change and protection. Policies and allocations must be shown geographically on the Proposals Map forming part of the plan.
Local Development Plan (or Deposit) Documents	These include the deposit Local Development Plan, the Sustainability Appraisal report, the initial consultation report, the candidate sites register, the Review Report (if appropriate), any relevant supporting documents.

Local Planning Authority (LPA)	A planning authority responsible for the preparation of an Local Development Plan; i.e. County or Borough Council, or National Park Authority.
Local strategy partnership	Partnerships of stakeholders who bring together service providers, private, community and voluntary sectors to identify and meet local needs more effectively and in a joined up way; usually engaged in producing and to produce the Single Integrated Plan.
Local Well-being Plan	Under The Well-being of Future Generations (Wales) Act 2015 Public Service Boards will be established for each local authority area; it is intended that each will prepare a Well-being Plan to replace the Single Integrated Plan by April 2018 (s.39).
Matters Arising Change (MAC)	Change after submission of an Local Development Plan, where the appointed Inspector concludes the change is necessary for soundness having considered all the evidence submitted to the examination.
Marine Plan	The Welsh National Marine Plan prepared under the Marine and Coastal Access Act 2009.

Mitigation	Measures to avoid, reduce or offset significant adverse effects.
National Park Management Plan (NPMP)	In national park areas the National Park Management Plan is the strategic over-arching policy document, co-ordinating and integrating other plans, strategies and actions where these affect the Park purposes and duties; it should inform the Local Development Plan. It is important that the Single Integrated Plan(s) dovetail(s) with the National Park Management Plan.
Objective	A statement of what is intended, specifying the desired direction of change in trends.
Output Indicator	An indicator that measures the direct output of the plan. These indicators measure progress in achieving the plan's objectives, targets and policies.
Participation	A process whereby stakeholders and the community can interface with plan makers.
Partners	Other local/National Park authority departments and statutory bodies where the Local Development Plan will help to deliver some of the objectives of their strategies. Partners may be expected to contribute to formulating relevant parts of the Local Development Plan.
Pre-deposit proposals documents	These include the vision, strategic options, preferred strategy, key policies, the Sustainability Appraisal report, the candidate sites register, Review Report (if appropriate).
Pre-deposit stage	The participation and consultation stages prior to deposit; the Manual refers to the Strategic Options and Preferred Strategy stage which relate to the full plan procedure; reduced requirements relate to the short form plan revision procedure.
Review Report	The required statutory report under S69 of the 2004 Act and/or Reg41; to conclude on the Local Development Plan revision procedure to be followed based on a clear assessment of what has been considered and what needs to change and why, based on evidence.
Scoping SA	The process of deciding the scope and level of detail of an Sustainability Appraisal, including the sustainability effects and options which need to be considered, the assessment methods to be used, and the structure and contents of the Sustainability Appraisal Report.
Service Level Agreement (SLA)	An agreement with a statutory agency which sets the standards which it will aim to meet, and the costs arising. The Planning Inspectorate agrees one with the Local Planning Authority in respect of an Local Development Plan examination, setting out the likely timescales and cost of the examination and providing the Local Planning Authority with clear guidance on the nature of their own responsibilities.
Short form revision procedure	May be appropriate for circumstances where the issues involved are not of sufficient significance to justify undertaking the full plan revision procedure.

Single Integrated Plan (SIP)	Discharges statutory duties identified by Welsh Government (“Shared Purpose – Shared Delivery”, WG 2012), including Community Strategies; prepared by a Local Service Board. See “Local Well-being Plans” which are to replace SIPs”.
Significant effect	Effects which are significant in the context of the plan (Schedule 1 of the SEA Regulations gives criteria for determining the likely significance of effects on the environment).
Significant Effects Indicator	An indicator that measures the significant effects of the plan.
Site specific allocations	Allocations of sites (proposals) for specific or mixed uses or development contained in a local development plan. Policies will identify any specific requirements for individual proposals. Allocations will be shown on the Local Development Plan’s proposals map.
Soundness	In order to be adopted, an Local Development Plan must be determined ‘sound’ by the examination Inspector (S64 of the 2004 Act). Tests of soundness tests and checks are identified in PPW (ch2) and the Manual (ch8).
Stakeholders	Interests directly affected by the Local Development Plan (and/or SEA) - involvement generally through representative bodies.
Statement of Common Ground (SocG)	The purpose of a Statement Of Common Ground is to establish the main areas of agreement between two or more parties on a particular issue.
Strategic Environmental Assessment (SEA)	Generic term used internationally to describe environmental assessment as applied to plans and programmes. Strategic Environmental Appraisal process is derived from European legislation and defined at European level – Directive 2001/42/EC. The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 (SEA Regulations) require a formal “environmental assessment of certain plans and programmes, including those in the field of planning and land use”.
Supplementary Planning Guidance (SPG)	Supplementary information in respect of the policies in an Local Development Plan. Supplementary Planning Guidance does not form part of the development plan and is not subject to independent examination but must be consistent with it and with national planning policy.
Sustainability Appraisal (SA)	Tool for appraising policies to ensure they reflect sustainable development objectives (i.e. social, environmental and economic factors). Each Local Planning Authority is required by S62(6) of the 2004 Act to undertake Sustainability Appraisal of the Local Development Plan. This form of Sustainability Appraisal fully incorporates the requirements of the Strategic Environmental Appraisal Regulations. The term is used in this Manual to include Strategic Environmental Assessment, unless otherwise made clear.
Sustainability Appraisal Framework	This comprises the identified Sustainability Appraisal objectives against which Local Development Plan options are then assessed.
Sustainability Appraisal Report (SA Report)	A document required to be produced as part of the Sustainability Appraisal process to describe and appraise the likely significant effects on sustainability of implementing the Local Development Plan, which also meets the requirement for the Environmental Report under the Strategic Environmental Appraisal Regulations. S62(6) of the 2004 Act requires each Local Planning Authority to prepare a report of the findings of the Sustainability Appraisal of the Local Development Plan. - The Sustainability Appraisal Report is first produced at the Preferred Strategy stage (the Interim Sustainability Appraisal Report), expanded at the Deposit Local Development Plan stage and finalised alongside the Adoption Statement.
Wales Spatial Plan (WSP)	A plan prepared and approved by the National Assembly for Wales under S60 of the 2004 Act, which sets out a strategic framework to

	guide future development and policy interventions, whether or not these relate to formal land use planning control. Under S62(5)(b) of the 2004 Act a local planning authority must have regard to the Wales Spatial Plan in preparing an Local Development Plan.
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Pembrokeshire Coast National Park

Local Development Plan – Replacement Plan (2015-2031)

Draft Delivery Agreement

**PEMBROKESHIRE COAST NATIONAL PARK
AUTHORITY APPROVED (Draft March 2016)**

WELSH GOVERNMENT xxxx

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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 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.
10. The Community Involvement Scheme (starts at page XX) sets out the principles methods of engagement and proposals for feedback.
11. Proposals for monitoring progress for the Replacement Plan and the Delivery Agreement are also set out (starts at page XX).

1. Introduction

What is the purpose of a Delivery Agreement?

12. This document, the Delivery Agreement, sets out the way in which we propose to involve the local community and other stakeholders in the preparation of the Pembrokeshire Coast National Park Replacement Local Development Plan. It replaces the original Delivery Agreement produced for the 1st Local Development Plan and Pembrokeshire Coast National Park Management Plan. The latter is not included in this review process.
13. It provides details of the various stages involved in the process, the time each part of the process is likely to take and how and when different groups, organisations and individuals can participate.
14. The Review Report for the Local Development Plan identifies areas fundamental to the overall strategy where the Plan is not delivering as satisfactorily as was envisaged by the Authority. It is therefore considered most appropriate to follow the prescribed review procedure for a replacement Local Development Plan.
15. The replacement Local Development Plan will also be evaluated to see how sustainable it is and how it is likely to impact on the environment. This information will be set out in the Sustainability Appraisal. The Sustainability Appraisal will also meet the requirements to carry out a Strategic Environmental Assessment. Opportunities to comment on these processes and documents will also be provided.
16. This revised Delivery Agreement is split into two parts:
 - The **Timetable** for producing the replacement Local Development Plan and associated Sustainability Appraisal. Definitive dates are provided up to the deposit stage and indicative dates for later stages (Chapter 2).
 - The **Community Involvement Scheme** which outlines the National Park Authority's principles of community engagement; its approach in relation to who, how and when it intends to engage with the community and stakeholders and how it will respond to representations (Chapter 3).

What is the Local Development Plan, its Guidance and Appraisal all about?

Local Development Plan

17. This is how we plan for and make land use decisions about the future of our towns, villages, coast and countryside.
18. Planning decisions will be made in accordance with the Local Development Plan unless material considerations indicate otherwise.¹ The Local Development Plan therefore provides the essential framework for rational and consistent decision making.

The adopted Local Development Plan (September 2010) includes planning policies to:

- protect our coast and countryside;

¹ Section 38(6) of the Planning and compulsory Purchase Act 2004

- guide development to certain locations; and
 - 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.

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

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 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 the policies of the Local Development Plan and planning applications. 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. This could for example include the production of Place Plans for specific allocated sites.

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.

29. The Replacement Local Development Plan is subject to an assessment of its sustainable development and environmental effects:

- Sustainability Appraisal assesses the environmental, social and economic implications of the emerging plans' strategies and policies.³
- Strategic Environmental Assessment (SEA) requires a rigorous assessment of the environmental, and to a lesser extent social, effects of the plans. This is intended to ensure environmental considerations are taken into account in the production of the plans.⁴
- Any plan or programme likely to have a significant impact on a Natura 2000 site (Special Area of Conservation (SAC) or Special Protection Area (SPA)) which is not directly concerned with the management of the site for nature conservation must be subject to a Habitats Regulations Assessment⁵. This assessment should identify the likely effects on the Natura 2000 site, determine whether these effects are justifiable in a wider context, and identify any mitigation measures that must be taken.

30. The first two assessments will be contained in the 'Sustainability Appraisal'. The Habitats Regulations Assessments will be reported separately. These assessments will run alongside, and be a part of, the production of the Local Development Plan. The Sustainability Appraisal will be documented in:

- An initial Scoping Report for the assessment of the replacement Local Development Plan. This report will describe the current sustainability issues and a common set of sustainability objectives against which the plans will be judged;
- A full report of the assessment of the replacement Local Development Plan as it emerges. This report will explain how the options and detailed policies considered for the plan are likely to perform with regard to the sustainability objectives set out in the scoping report. This report will also explain how any harmful effects of the replacement Local Development Plan can be avoided or offset, and how the beneficial effects can be maximised;
- A statement explaining how sustainability considerations and the assessments has been taken into account in the production of the replacement Local Development Plan.

31. Habitats Regulations Assessment will have the following stages:

- Screening
- Habitats Regulations Assessment

What is the Pembrokeshire Coast National Park? (insert prior to publication)

³ Planning and Compulsory Purchase Act, 2004

⁴ As required by Statutory Instrument 2004 No.1656 (W.170), The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 (<http://www.opsi.gov.uk/legislation/wales/wsi2004/20041656e.htm>); and Planning and Compulsory Purchase Act 2004, Section 62(6) and European Directive EU2001/42/EC (<http://www.opsi.gov.uk/acts/acts2004/40005--g.htm#62>)

⁵ As required by European Union Directive 92/43/EC (the Habitats Directive)

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.

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 Review Report, which, after noting all considerations, concludes that any move to joint plan preparation would require a fundamental reassessment of both strategies, with considerably more work and supporting evidence required than is otherwise anticipated for individual Plan review. For the Council, an early and unnecessary review of the Plan would incur considerable unnecessary additional cost (additional staff resource) and at the same time would result in unhelpful uncertainty for decision making on planning applications during plan preparation, with the prospect of facing a further early review on Local Government reorganisation. It has been agreed that separate Plans will be maintained. The two Authorities will however continue further joint working on an evidence base to support implementation and review of both the Authority's and Council's Local Development Plans.

2. Timetable

Key Stages of Preparation

41. For the Local Development Plan the timetable differentiates between:
- **Definitive stages**, up to and including the statutory deposit stage, which are under the direct control of the Authority and have, therefore, realistic target dates; and
 - **Indicative stages**, beyond the statutory deposit stage, that are dependent on extraneous factors, (e.g. a number of representations received, capacity of the independent Planning Inspector, etc) for which the Authority has less control. These dates will be reconsidered after reaching deposit stage and turned into definitive timings for the remaining stages, this to be submitted for agreement to the Welsh Government. When agreed this must be publicised.
42. It is proposed that a tolerance level of two months be built into the timetable proposed to allow for slippage without formal amendment to the Delivery Agreement. The Local Development Plan Manual – Edition 2 August 2015 asks that corporate scrutiny arrangements, independent of the plan making team should be set up to monitor progress.⁶ The National Park Authority has in place regular Local Development Plan workshops where Members have an opportunity to monitor progress.
43. The following timetable assumes completion of the draft Review Report for the Local Development Plan by March 2016.⁷ The final Review Report will determine the main areas of the Plan where engagement needs to be focussed. The draft timetable below reflects current known areas for review. It anticipates 2 ½ years to submission. The Inspectorate historically has advised with a first Local Development Plan that the Inspectors report can be sent to the Authority within one year of the submission date. Welsh Government expects replacement Plans to be in place in much less than 4 years.

Stage (Replacement Plan)	Steps	Completion Target Date & Publications/ Submissions
Review Report	<ul style="list-style-type: none"> - Consider conclusions of Annual Monitoring Reports and updated evidence base and stakeholder engagement. - Prepare Report and seek Welsh Government informal view. - Publish background papers and evidence - Informal Consultation - NPA Approval - Submit to Welsh Government 	<ul style="list-style-type: none"> - <i>NPA Approval for informal consultation March 2016</i> - <i>8 week consultation April/May</i> - <i>Workshops with Town & Community Councils April 2016</i> - <i>Report of consultations/Finalise NPA June/July 2016</i> - <i>Publish Review Report</i>

⁶ Paragraph 4.1.5 Local Development Plan Manual – Edition 2- August 2015

⁷ Paragraph 10.1.1 Local Development Plan Manual – Edition 2-August 2015 refers to a rapid publication of the Review Report within 6 months form start of the review process.

Stage (Replacement Plan)	Steps	Completion Target Date & Publications/ Submissions
The Delivery Agreement (Regulations 9 and 10⁸) & (Regulations 2(3)⁹	<ul style="list-style-type: none"> - Review the 1st Plan's Delivery Agreement - informal consultation exercise. - NPA Approval - Submit to Welsh Government for agreement - Following agreement, publicise and notify all the specific consultation bodies, and such of the general consultation bodies as the LPA considers appropriate, that the Delivery Agreement has been revised. (Regulations 9(4A)&(5), & 10(2)) 	<ul style="list-style-type: none"> - Member workshop March 2016 and invite to comment - NPA approval for informal consultation March 2016 - 8 week engagement and consultation April/May 2016 - Workshops with Town & Community Councils April 2016 - Report of consultations/ Finalise NPA June/July 2016 - Submit Delivery Agreement to Welsh Government for agreement June/July 2016. - Publication of the Delivery Agreement for the Replacement Plan once agreed
Sustainability Appraisal Scoping Report	<ul style="list-style-type: none"> - Review baseline information - Review indicators and objectives - Consider responses and revise - NPA Approval - Publish 	<ul style="list-style-type: none"> - Member workshop March 2016 - NPA approval for formal consultation March 2016 - 8 week consultation April/May 2016 - Report of consultations/Finalise NPA June 2016 - Publish Scoping Report June/July 2016
Pre- Deposit Participation (Regulation 14)	<ul style="list-style-type: none"> - Check/Revise site selection criteria, - Prepare a Candidate Site Register (invite site submissions using selection criteria) - Consider the implications of the revised evidence base - Check/Revise strategic vision and objectives - Check/Revise Strategic Options and Preferred Option/Strategy. Evaluate any sites submitted against the 	<ul style="list-style-type: none"> - Discuss Candidate Site criteria - Town & Community Council workshops April 2016 - Member workshop – Agree selection criteria at NPA (June/July NPA 2016) - Invite Candidate Site submissions August/September/October 2016 - Relevant statutory undertakers on Candidate Site Selection

⁸ Town & Country Planning (Local Development Plan) (Wales) Regulations 2005

⁹ Town & Country Planning (Local Development Plan) (Wales) (Amendment) Regulations 2015

Stage (Replacement Plan)	Steps	Completion Target Date & Publications/ Submissions
	<ul style="list-style-type: none"> - site criteria - Review original Sustainability Appraisal of the Options and Strategy proposed and recommend changes or improvements. - Equalities Impact Assessment Screening Report 	<p><i>November/December 2016</i></p> <ul style="list-style-type: none"> - <i>Engage with stakeholders on Areas of Potential Change until December 2016</i> - <i>Candidate site selection/Areas of potential change engagement with Town & Community Councils January/February 2017</i> - <i>Member workshops to February 2017</i> - <i>Prepare Draft Preferred Strategy documents for NPA Approval for consultation March 2017</i>
Pre-Deposit Consultation (Regulations 15, 16 and 16a¹⁰)	<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"> - <i>Preferred Strategy Proposals documents (see across) &</i> - <i>Sustainability Appraisal Statutory Consultation April/May 2017</i> - <i>Publication of the Initial Consultation Report September 2017</i>
Deposit Regulations 17, 18 and 19)	<ul style="list-style-type: none"> - Review more detailed policies for the Deposit Plan not included at Preferred Strategy stage. - Review Sustainability 	<p><i>Finalise Deposit Plan documents for approval for consultation March 2018</i></p> <p><i>Statutory consultation April/May 2018</i></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
	<p>Appraisal of Deposit Local Development Plan policies.</p> <ul style="list-style-type: none"> - Review and update 1st 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 	<i>Member Workshop Agree Submission Documentation National Park Authority September 2018¹¹</i>
Independent Examination (Regulation 23)	<ul style="list-style-type: none"> - Test of soundness of the Plan 	Spring 2019 <i>Inquiry Library Statements of Case</i>
Publication of the Inspector's Report (Regulation 23)	-	<i>Autumn 2019</i> 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 Statement	<ul style="list-style-type: none"> - Revise the Sustainability Appraisal to take account of changes following Independent examination. - When the Local Development Plan is adopted publish a statement of how sustainability issues have been taken into account. 	<i>New Year 2020</i> Publicise the final Sustainability Appraisal
Monitoring and Review	- <i>Monitor the</i>	<i>Annually</i>

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

Stage (Replacement Plan)	Steps	Completion Target Date & Publications/ Submissions
(Regulation 37)	<i>achievement of targets and any significant environmental effects of the Plan's implementation and review Plan as necessary.</i>	Annual Monitoring Report

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

¹² Paragraph 10.2.5 Local Development Plan Manual Edition 2 August 2015

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.

National Park Authority Members

46. The National Park Authority has set in place a series of Member workshops where which consists of all Authority Members. The workshops provide an opportunity to discuss the appropriateness of approach being taken in the development of the Delivery Agreement, the Local Development Plan and the Sustainability Appraisal. The group will also consider all consultation responses prior to them being considered at a National Park Authority Meeting.
47. The National Park Authority (18 members) will be responsible for making all the key decisions at each stage in the Plan preparation process.

Can anything go wrong with the timetable proposed?

48. Despite attempting to plan for every eventuality obstacles do arise. Issues which may cause difficulties in keeping to the timescale proposed or implementing the programme of engagement proposed are set out in Appendix 3.
49. Possible mitigation measures are set out in the final column. In spite of best intentions it is still proposed that a tolerance level of two months be built into the timetable proposed to allow for slippage without formal amendment to the Delivery Agreement.

3. Community Involvement Scheme

The Local Development Plan team and decision making structure

50. Officers within the Authority are required to:

- Ensure the Local Development Plan Review process is carried out in accordance with the relevant legislation and best practice.
- Make the best use of available resources.
- Prepare and maintain an up to date evidence base for the Review process and identify key contextual changes that have occurred since the adoption of the first Plan.
- Actively engage with many different groups and bodies as described below throughout the Revision process.
- Consolidate outcomes of this engagement, together with the evidence base and make policy recommendations for the Replacement Plan throughout the various stages to accord with the Planning Inspectorate Tests of Soundness (See Appendix 1).
- Report findings and recommendations to members of the National Park Authority for approval at each key stage and carry out actions as instructed.
- Conduct workshops to brief Members and consultees of key stages, discuss findings and policy recommendations.

51. The Members of the National Park Authority are required to:

- Act in the best interests of the National Park as a whole.
- Provide Sounding Board Panel advice for Officers during the preparation of key Review documents and policy options.
- Consider the recommendations of Officers at key stages of the Review process and make decisions on behalf of the Authority

52. Formal approval by the National Park Authority will be required at key Review stages including the Review Report, Delivery Agreement, the Preferred Strategy, Deposit proposals and final adoption.

53. 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, who will examine the soundness of the Replacement Plan. The Authority will follow the advice provided in paragraph 2.8 of Planning Policy Wales Edition 8 January 2016 when considering the status of the emerging replacement Plan.

Why get involved?

54. Any organisation that has an impact on people, partner organisations and communities knows their active and willing support makes all the difference. It is important that we understand what is important to the community and what sort of place we collectively think the National Park should be. From identifying issues to helping ensure a project or plan is put into practice, effective community involvement plays a key part in the process.

55. The production of a Replacement Local Development Plan provides an opportunity for the Authority to fine tune its engagement process, to draw upon lessons learnt from the original Local Development Plan production in order to maximise the effectiveness of community involvement from available resources.

What principles of engagement can you expect from us?

56. The following principles of community and stakeholder engagement are fundamental to the successful delivery of these Plans:
- We will seek to make the process, strategy and policy proposals and decision making process as accessible and easily understood as possible.
 - We will seek to make the best use of existing information and networks to avoid duplication and consultation fatigue.
 - We are committed to ensuring that we communicate and consult with all sections of the community, including those who have not traditionally participated in plan production, using a range of appropriate approaches to maximise effectiveness.
 - We are committed to ensuring that feedback is reported, and is an integral part of our decision making processes.
 - The inputs and outputs of all our engagement measures will be public information.
 - We will aim to build a consensus whilst remaining realistic, recognising that a consensus is more likely when developing options rather than when writing the detailed policies of the Plans; when aiming to agree on what the main issues are rather than how to respond; and when agreeing what needs to be developed rather than where it is developed.
 - We will aim to outline clearly where there are opportunities for local discretion and where there is a need to respect national policy and statutory designations.

What will we need from you?

57. The Authority will need those participating in the process to disclose information of relevance to the development plan in so far as they are able, in the specified timescales laid down in the Delivery Agreement. This is critical in order to ensure an equitable, transparent and open exchange of information to inform policy development. The Authority will expect people and organisations to keep us up to date with any changes in contact details.
58. Everyone making representations on the Local Development Plan will be encouraged to relate their comments to the tests of soundness (Appendix 1).

Bilingual Engagement

- The Authority welcomes correspondence in Welsh or English and correspondents will receive a reply in the language of the original letter. Corresponding in Welsh will not lead to delay in processing your comments.
- All standard letters, comments forms, newsletters and public notices will be bilingual.
- All National Park Authority policy and guidance publications will be bilingual.
- All National Park Authority publicity and advertising material will be bilingual.
- All meetings, whether formal or informal, will be conducted bilingually where requested beforehand.

Who will be involved and how?

59. We will be using a variety of ways to ensure we make contact with people and that they stay in touch with us throughout the process identified in the Local Development Plan Timetable (Chapter 2).

60. Consultees are organised into different groups¹³, for which different methods of engagement are considered most appropriate in order to maximise the benefits from available resources. Please note that each group is not mutually exclusive and individuals or organisations are likely to be represented as part of more than one group during different stages of the process.

The General Public

61. This can be any member of the public in Pembrokeshire and beyond. Individuals, businesses, organisations and groups can become involved by commenting at the key stages in the process. These will be, on the draft Review Report and its supporting documentation, draft Delivery Agreement, the Pre-Deposit Consultation Stage, Deposit Plan and at the Examination.
62. The Authority has no statutory requirement to consult the general public on the Review Report or Delivery Agreement, however in the interests of early and continued engagement, it is considered important to do so.
63. In order to capture the maximum publicity to interested members of the public, (who are not on the direct mailing group explained below) there will be publicity on the National Park Authority's website on progress made and when representations can be made.
64. Role – The general public help the Authority develop detailed local knowledge of specific areas within the National Park. Individuals with detailed knowledge and experience of certain topics relevant for the Local Development Plan can serve as a key source of information for the Authority. The public will also act as a sounding board for how policy recommendations, site allocations and other detailed proposals will be received and the reasons for public support or objection.

The Direct Mailing Group

65. Any individual, organisation, or group can be added to the National Park Authority's Direct Mailing List so that they can be automatically kept informed at all subsequent stages of the process. All those falling within consultee groups below are included on the mailing list.
66. To be kept directly informed of progress and opportunities to comment the public can email devplans@pembrokeshirecoast.org.uk giving contact details or telephone 01646 624 800 and ask to be put through to Park Direction. Our contact with you will be by direct mailing (or emailing, if you prefer) of details on consultations taking place or newsletters on progress made to date.
67. All those who submit representations during the statutory consultation periods will be added to the Direct Mailing List.

Seldom Heard Groups¹⁴

68. These are the groups that traditionally have not taken part to any great extent in preparing Plans and extra efforts will be required to encourage these people or groups to be involved. This will be achieved by using already established forums, wherever possible.
69. It is recognised that some who are seldom heard may not have any associations with existing forums. We will continue to look for opportunities to reach as many facets of our

¹³ See Annex B of the Local Development Plan Manual Edition 2 August 2015

¹⁴ See Appendix 4 for list.

community as possible subject to the amount of time and resources that can be reasonably dedicated to this.

70. The National Park Authority will target, in particular, the following seldom heard groups.
- Voluntary Organisations operating in Pembrokeshire - through liaising directly with Pembrokeshire Association of Voluntary Services – See Appendix 4 Consultation Groups' for the types of organisations and groups represented.
 - Gypsy Traveller Community – through liaising with the Pembrokeshire County Council's Gypsy Traveller Accommodation Assessment Group including attending meetings when appropriate.
 - Farmers – through liaising directly with Pembrokeshire Sustainable Agriculture Network (PSAN) Steering Group with attending meetings when appropriate. See Appendix 4 Consultation Groups' for the types of organisations and groups represented.
71. Role – Those who are engaged will be provided with an opportunity to voice the aspirations, requirements or concerns for those groups of people who do not traditionally engage with the Local Development Plan process. Active engagement from these groups will help the Authority consider the impacts of its proposals upon society as a whole.

Community and Town Councils¹⁵

72. The Authority will seek to engage directly with Community and Town Councils at appropriate stages. This will include holding two sets of workshops:
- The first to raise awareness of Local Development Plan review focussing on the draft Review Report and draft Delivery Agreement and the site selection process.
 - The second set will focus on discussion of the areas of change included in the Local Development Plan Preferred Strategy and the selection of sites that fit with the Preferred Strategy prior to Pre – Deposit Consultation.
74. The Authority intends to utilise the networking capabilities of Town and Community Councils to disseminate information throughout the National Park communities and to encourage engagement in their respective areas.
75. Role – Town and Community Councils and their Councillors can provide a central source of information for their local communities, they can help to raise awareness of the Review process and relay local views and opinions back to the Authority.

'Specific Consultation Bodies' and 'UK Government Departments' ¹⁶

76. These consultees (Groups B2 and B3 within the Local Development Plan Manual 2015) comprise those bodies with specific functions that apply within the National Park, for example Dwr Cymru as the local water undertaker. The Authority also needs to consult UK Government Departments where aspects of the plan appear to affect their interests.
77. These consultees will be provided with an opportunity to comment at key formal (statutory) stages in Plan preparation. Some of these groups will also be important members of other stakeholder groups (See Appendix 4 Consultation Groups').

¹⁵ See Appendix 4 for list

¹⁶ . See Appendix 4 for list.

78. An appearance at the Examination Hearings may also be invited by the Inspector even if the statutory consultee had not raised an objection or wished to appear at Inquiry.
79. Role – consultees in this group will be able to provide detailed, professional advice on the Replacement Plan proposals, identify potential conflicts with their respective duties, the suitability and deliverability of sites for development, unforeseen conflicts with other legislation and so on.

General Consultation Bodies and Other Consultees¹⁷

80. 'General Consultation Bodies' include voluntary bodies whose activities benefit the National Park, those which represent the interests of different racial, religious, ethnic, national or disabled groups in the National Park, as well as those which represent the interests of persons carrying on business and those which represent the interests of Welsh culture. This group for example includes National Farmers Union of Wales, Wales Pensioners etc.
81. 'Other Consultees' are those 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. This group for example includes the National Trust, British Geological Survey, Pembrokeshire Coastal Forum etc.
82. These bodies will be provided with an opportunity to comment at key formal (statutory) stages. Some of these groups will also be important members of other stakeholder groups (See Appendix 4 Consultation Groups').
83. Role – Similar roles to those identified above depending on the nature of the body being represented. Many of the bodies within these two groups will be expected to disseminate information amongst their own membership bodies to maximise the Authority's outreach with the available resources.

Stakeholders¹⁸

84. For the replacement Local Development Plan, given that it is anticipated that the strategy will predominantly remain intact, it is intended that individual liaison including meetings will be set up with relevant stakeholders to discuss areas of change in advance of formal consultation. These stakeholders include:
- Neighbouring authorities
 - Welsh Water
 - Natural Resources Wales
 - Welsh Government
 - Pembrokeshire Business Panel
 - Local Service Board
 - Pembrokeshire Sustainable Agriculture Group
 - Affordable Housing Group for Pembrokeshire
 - Pembrokeshire Community Energy Network
 - Pembrokeshire Coastal Forum
 - Home Builders Federation
 - Destination Pembrokeshire Partnership

Stakeholder's details are also entered on the direct mailing list.

¹⁷ See Appendix 4 for list

¹⁸ See Appendix 4 for list

Developers and Agents and those proposing sites for development

85. Anyone with an interest in land who considers it would be appropriate for development can provide details to the Development Plan Section during the Pre-Deposit engagement Candidate Site stage. A Candidate Site submission form will be placed on our website: www.pembrokeshirecoast.org.uk along with guidance for completion.
86. These details will be entered into a Candidate Site Register. The Candidate Site Register will be made public alongside the Local Development Plan Preferred Strategy consultation.
87. Any site submitted prior to the publication of the Pre-Deposit Consultation of the Plan will be assessed by the Authority against criteria for site selection. The criteria for site selection will be prepared at the pre-deposit participation stage. A list of sites on the register that would be compatible with the Authority's Preferred Strategy will be published for comment.
88. It is vital that the promoters of potential sites appreciate that bringing them forward after the preferred strategy stage will mean that it is unlikely they can be considered for inclusion in the plan. It should be made clear that the candidate site call is the appropriate time to submit sites so that sufficient consultation can take place to inform the examination process. (Local Development Plan Manual Edition 2, paragraph 5.3.4.3).
89. If there has been a material change in circumstances affecting a previously rejected site, or a completely new site is put forward, it is the responsibility of the proponent to test the effects of their site using the Local Planning Authority Sustainability Appraisal framework. (Local Development Plan Manual Edition 2, paragraph 6.5.1.5).
90. Following Preferred Strategy consultation there will be no vetting process to ensure that submissions are satisfactory in terms of Sustainability Appraisal: any vetting will take place as part of the examination before the Inspector since the Sustainability Appraisal is part of the evidence base that should support the policies and proposals in the deposit Local Development Plan. If a new or alternative site has not been subject to any Sustainability Appraisal, it is unlikely that the Inspector will be in a position to recommend its inclusion in the Local Development Plan. (Local Development Plan Manual Edition 2, paragraph 6.5.1.6)
91. At Deposit stage consultation where any statutory processes have not been undertaken for sites submitted late in the preparation process, the Inspector's report would not be able to recommend their inclusion in the Local Development Plan. Furthermore, if such a change would make the Local Development Plan unsound, the Inspector would not be able to recommend in its favour. It is therefore the responsibility of those promoting such changes to show that the proper procedures have been undertaken and to provide the necessary evidence to demonstrate that the plan would be sound if the site were to be included. This would include the site's compatibility with the Sustainability Appraisal. (Local Development Plan Manual Edition 2, paragraph 7.4.4.7)
92. Respondent's details will also be entered on the direct mailing list.

What feedback should you expect?

93. At the conclusion of significant stages in the Review process feedback will be provided on representations made by:
 - Acknowledgement letter or e-mail providing contact details and details on how the Authority will deal with the representation. Advice on how late representations will be treated is set out in the next section.

- A report of consultations with Officer responses after each consultation period will be made publically available. Respondents will be advised when the report of consultations is available.
- Petitions received will be acknowledged in the same way to the presenter of the petition.

The Authority's website: www.pembrokeshirecoast.org.uk will also provide regular updates.

Late Representations

94. The Authority will only consider representations made in accordance with the relevant public notice for the consultation period. This means sending representations in writing to the National Park Authority or on line by the closing date specified in the notice.
95. To be logged as 'duly made' as a Local Development Plan representation they must specify the matters to which they relate at Pre-Deposit Consultation stage. At the Deposit Stage they should specify the matters to which they relate and the change being sought, the grounds on which they are made and, wherever possible, the test(s) of soundness to which they relate.
96. Advice on site submissions is provided under 'Developers and Agents and those proposing sites for development.'
97. Objections should specify the change sought, the grounds on which they are made and wherever possible the tests(s) of soundness to which they relate.
98. Duly made objections at Deposit Stage can be considered at Inquiry. Representations made at Pre-Deposit Stage are not considered by the Inspector.
99. If a representation is received later than the closing date and there was a clear attempt in good faith to submit in time the submission may still be considered as 'duly made' provided that appropriate objective evidence of posting or delivery is supplied to the reasonable satisfaction of the Authority.
100. Those who have a statutory right to appear before, and be heard by, the examination Inspector (i.e. objectors, those who seek a change to the plan – under Section 64(6) of the 2004 Act) that they may pursue their objections by using the written representation procedure if they do not wish to appear at the examination. Objections pursued in this way carry as much weight with Inspectors as those made orally at examination. (Local Development Plan Manual Edition 2 paragraph 7.4.4.2)

4. Monitoring and Review

Delivery Agreement

101. The Delivery Agreement will be reviewed if:
 - The Plan preparation process falls behind schedule (i.e. over 2 months)
 - If significant changes are required to the Community Involvement Scheme
 - If significant changes occur in the resources available to carry out Plan preparation
102. Achieving the objectives of the Delivery Agreement will be assessed through each stage of the Plan's preparation.
103. Within 3 months of close of the Deposit an updated timetable turning the indicative timings into definitive timings for the remaining stages will be submitted to the Welsh Government for agreement.

Local Development Plan

104. A major review of the Local Development Plan must be undertaken four years following first adoption.
105. Annual monitoring reports for the Local Development Plan will be submitted by the 31st of October each year to the Welsh Government covering performance for the previous financial year (ends in March). The reports will be made available on the Authority's website and any critical issues that arise will feed into a review of the Plan.
106. The Authority will consult annually on each Monitoring Report, the results of which will feed into the production of the following Monitoring Report.
107. A review of the Local Development Plan could mean a replacement Local Development Plan is needed or it requires alteration. A Review Report will be prepared within six months of a decision on the need for review of the Local Development Plan when the necessary regulations are in place. A review or partial review will also require revisions to the Delivery Agreement in consultation with the Welsh Government.

5. What happens next with this document?

108. This is a working draft document for which the results of the consultation exercise will feed into. The closing date for comments on the Delivery Agreement is set out in the covering letter. The National Park Authority will consider all responses received to the consultation.
109. There is a comments form accompanying the Draft Delivery Agreement. It provides an opportunity to give feedback on the approach suggested.
110. All those who participated will be given feedback.

6. Useful Contacts

National Park Authority

For further information you can contact:

Richard James (**Local Development Plan**)
Sarah Middleton (**Local Development Plan**)
Martina Dunne (**Local Development Plan**)

Phillip Barlow (**Sustainability Appraisal**)

Pembrokeshire Coast National Park Authority
Llanion Park
Pembroke Dock
Pembrokeshire
SA71 6DY

Phone:

01646 624 800

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01646 689076

Email:

devplans@pembrokeshirecoast.org.uk

website: www.pembrokeshirecoast.org.uk

Planning Aid

Planning Aid is a voluntary service linked to the Royal Town Planning Institute, offering free, independent and professional advice on town planning matters to community groups and individuals who cannot afford to employ a planning consultant. The contact details are:

- Ring: 029 2062 5000

- Email via website on <http://www.planningaidwales.org.uk/contact-us/>
- Or write: Planning Aid Wales, First Floor, 174 Whitchurch Road, Heath, Cardiff. CF14 3NB



Appendix 1 'Soundness Tests'

- a) The fundamental concept of the Local Development Plan system is that the plan is the product of a thorough and comprehensive process of engagement with the community, where the planning authority has refined the options to produce what it considers to be a sound plan. The presumption will therefore be that the Local Development Plan is sound unless it is shown to be otherwise as a result of evidence considered at the examination.
- b) Consequently those who object will need to show why the plan is not sound. Everyone making representations on the Local Development Plan will be encouraged to relate their comments to the tests of soundness.
- c) Nonetheless, it is the responsibility of the appointed Inspector at the examination stage, to consider the soundness of the plan as a whole. Whilst Inspectors will still consider individual objections it will be on the basis of how these address the plan's overall soundness.
- d) The examination will take the form of a public discussion where the issues to be discussed will be identified in advance by the Inspector and participants invited to contribute. Different types of procedures will be used but mostly round table discussions or hearings. Formal hearings may be used if the Inspector considers this necessary and appropriate. The Inspector will decide on the appropriate procedure with the presumption that it will be informal.
- e) The tests of soundness relate to three areas:
 - Does the plan fit? (i.e. is it clear that the LDP 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?)

More information on the tests of soundness can be found on the Inspectorate's website <http://planninginspectorate.gov.wales/?skip=1&lang=en> in a document entitled 'Local Development Plan Examinations: Procedure Guidance (August 2015)'.

Appendix 2 'Population Profile' – to be added prior to consultation

Appendix 3 Risks for the timetable

Issue¹⁹	Risk Level	Potential Impact	Mitigation
Staff shortages	Medium	Programme Slippage	Seek assistance from other planning authorities. Prioritise staff advertising. Service Level Agreement in place with National Park Authorities.
Evolving National Legislation/ Policy/Governance issues	High	Programme Slippage	Monitor and address where feasible.
Lack of financial resources due to austerity measures	Low	Programme Slippage	Bid for resources as part of budget round and programme accordingly. Reserve in place for Revision.
Unanticipated levels of objection	Low	Programme Slippage	Provide flexibility in the timetable.
Planning Inspectorate or statutory consultees unable to meet timetable	Low	Programme Slippage	Liaise with the Planning Inspectorate at key stages of Plan preparation and during the preparation of the Service Level Agreement
Plan fails the test of soundness	Medium/ High	Part of the Plan is excluded or changed Additional material needs to be included in the Plan before adoption All the Plan withdrawn	Liaise with Welsh Government and Authority Members and ensure plan procedure and content are sound as it progresses to submission for examination.
Delays in printing or	Low	Programme slippage.	Ensure

Issue ¹⁹	Risk Level	Potential Impact	Mitigation
translation			approach to formatting and presentation is not dependent on significant graphics input. Ensure translators are available for the translation of substantive documents.
Legal Challenge	Low	Adopted Plan quashed Additional workload	Ensure the statutory requirements are complied with. Liaise with the Welsh Government regarding mitigation measures.

Appendix 4 Consultation Groups – to be added prior to consultation

Appendix 5 'Glossary of Terms'

Annual Monitoring Report (AMR)	This will assess the extent to which policies in the local development plan are being successfully implemented (Regulation 37 of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005.
Baseline	A description of the present state of an area against which to measure change.
Biodiversity Action Plan	A plan that sets objectives and actions for the conservation of biodiversity, with measurable targets, whose aim is to conserve and enhance nature across communities by bringing together all interests by involving sectors such as agriculture and business as well as the communities themselves. Action is developed and taken forward in partnership and in doing so reflects local priorities as well as biodiversity needs.
Candidate Site	Candidate Sites are those nominated by anyone for consideration by the LPA as allocations in an emerging LDP.
Candidate Sites Register	Register of candidate sites prepared following a call for candidate sites by the LPA.
Citizens Panel	A randomly selected, representational number of residents who are consulted on a regular basis on a range of local issues and services.
Community	People living in a defined geographical area, or who share other interests and therefore form communities of interest.
Community Infrastructure Levy (CIL)	The Community Infrastructure Levy is a planning charge, introduced by the Planning Act 2008 as a tool for local planning authorities to help deliver infrastructure to support the development of their area. It came into force on 6 April 2010 through the Community Infrastructure Levy Regulations 2010.
Community Involvement Scheme (CIS)	Sets out the project plan and policies of the LPA for involving local communities, including businesses, in the preparation of local development plans. The CIS is submitted to the Welsh Government as part of the Delivery Agreement for agreement.
Community Strategy	Required by the Local Government (Wales) Measure 2009 (Part 2: Sections 37-46) with the aim of improving the social, environmental and economic well being of their areas. See "Single Integrated Plan".
Consensus building	A process of early dialogue with targeted interest groups to understand relevant viewpoints and agree a course of action.
Consultation	A formal process in which comments are invited on a particular topic or set of topics, or a draft document.
Consultation Body	An authority with environmental responsibilities concerned by the effects of implementing plans and programmes and which must be consulted under the SEA Regulations; i.e. Natural Resources Wales (NRW) and Cadw.
Consultation exercise	A single consultation project focused on a defined objective and usually part of an overall consultation programme.
Contextual Indicator	An indicator used to monitor changes in the context within which the plan is being implemented.
Delivery Agreement (DA)	A document comprising the LPA's timetable for the preparation of the LDP together with its Community Involvement Scheme, submitted to the Welsh Government for agreement.
Deposit Documents	See "LDP documents".
Development management policies	A suite of criteria-based policies which will ensure that all development within the area meets the aims and objectives set out in the Strategy.
Dialogue methods	Different techniques of interaction that build a continuous dialogue between and among affected groups.

Engagement	A process which encourages substantive deliberation in a community. Proactive attempt to involve any given group of people/section of the community.	
Environmental Report	Document required by the SEA Regulations which identifies, describes and appraises the likely significant effects on the environment of implementing the plan, see Sustainability Appraisal Report.	
Evidence Base	Interpretation of Baseline or other information/data to provide the basis for plan policy.	
Focussed Change (FC)	Changes proposed to the deposit LDP prior to submission that are extremely limited in number, that reflect key pieces of evidence, but do not go to the heart of the plan.	
Habitats Regulations Assessment (HRA)	The screening and appropriate assessment of options required under Part 6 Chapter 8 of the Conservation of Habitats and Species Regulations 2010 (as amended) (the Habitats Regulations) - a recognised iterative process which helps determine the likely significant effect on a plan or programme and (where appropriate) assess adverse impacts on the integrity of a European site. The assessment is required to be undertaken by a competent authority in respect of plans or projects which are likely to have a significant effect (alone and in combination with other plans and projects) on a "European site" (see paragraph 5.1.2 of TAN 5), or as a matter of policy a proposed "European site" or Ramsar site, under the provisions of Article 6(3) of the EC Directive 92/43/ECC (the Habitats Directive), regulations 61 and 102 of the Conservation of Habitats and Species Regulations (as amended) 2010, and, regulation 25 of the Offshore Marine Conservation (Natural Habitats &c) Regulations 2007.	
Indicator	A measure of variables over time, often used to a measure achievement of objectives.	
Initial SA Report	A term used in LDP Wales to refer to the SA Report, produced at the Preferred Strategy stage. This assesses the LDP options against the SA framework. The report is then expanded at the Deposit LDP stage and finalised alongside the Adoption Statement.	
Involvement	Generic term to include both participation and consultation techniques.	
LANDMAP	LANDMAP is the formally adopted methodology for landscape assessment in Wales; therefore all landscape work and assessments of the effects arising from a proposals impact on the landscape in Wales should include LANDMAP	
LDP (or Deposit) Documents	These include the deposit LDP, the Sustainability Appraisal report, the initial consultation report, the candidate sites register, the Review Report (if appropriate), any relevant supporting documents.	
Libraries	Cardigan Crymych Fishguard Goodwick Hakin Haverfordwest Milford Haven Narberth	Newport Neyland Pembroke Pembroke Dock St Clears St Davids Saundersfoot Tenby
Local Development Plan (LDP)	The required statutory development plan for each local planning authority area in Wales under Part 6 of the Planning and Compulsory Purchase Act 2004. - A land use plan that is subject to independent examination, which will form the statutory development plan for a local planning authority area for the purposes of the Act. It should include a vision, strategy, area-wide policies for development types, land allocations, and where necessary policies and proposals for key areas of change and protection. Policies and	

	allocations must be shown geographically on the Proposals Map forming part of the plan.
Local Planning Authority (LPA)	A planning authority responsible for the preparation of an LDP; i.e. County or Borough Council, or National Park Authority.
Local strategy partnership	Partnerships of stakeholders who bring together service providers, private, community and voluntary sectors to identify and meet local needs more effectively and in a joined up way; usually engaged in producing and to produce the Single Integrated Plan.
Local Well-being Plan	Under The Well-being of Future Generations (Wales) Act 2015 Public Service Boards will be established for each local authority area; it is intended that each will prepare a Well-being Plan to replace the SIP by April 2018 (s.39).
Marine Plan	The Welsh National Marine Plan prepared under the Marine and Coastal Access Act 2009.
Matters Arising Change (MAC)	Change after submission of an LDP, where the appointed Inspector concludes the change is necessary for soundness having considered all the evidence submitted to the examination.
Mitigation	Measures to avoid, reduce or offset significant adverse effects.
National Park Management Plan (NPMP)	In national park areas the National Park Management Plan is the strategic over-arching policy document, co-ordinating and integrating other plans, strategies and actions where these affect the Park purposes and duties; it should inform the LDP. It is important that the Single Integrated Plan(s) dovetail(s) with the NPMP.
Objective	A statement of what is intended, specifying the desired direction of change in trends.
Output Indicator	An indicator that measures the direct output of the plan. These indicators measure progress in achieving the plan's objectives, targets and policies.
Participation	A process whereby stakeholders and the community can interface with plan makers.
Partners	Other local/NP authority departments and statutory bodies where the LDP will help to deliver some of the objectives of their strategies. Partners may be expected to contribute to formulating relevant parts of the LDP.
Pre-deposit proposals documents	These include the vision, strategic options, preferred strategy, key policies, the Sustainability Appraisal report, the candidate sites register, Review Report (if appropriate).
Pre-deposit stage	The participation and consultation stages prior to deposit; the Manual refers to the Strategic Options and Preferred Strategy stage which relate to the full plan procedure; reduced requirements relate to the short form plan revision procedure.
Press Releases	Sent to all Welsh media, including newspapers, radio and television news stations. Media may choose not to print or broadcast the news item.
Public Notice	Official notices that comply with all requirements in the Local Development Plan and Strategic Environmental Appraisal Regulations etc. for notification or publicity. There is no set statutory format for notices. Notices should be drafted with a view to accessibility in terms of simpler explanation and the use of plain language. The National Park Authority will place public notices in the public notice section in the Pembrokeshire Herald.

Review Report	The required statutory report under S69 of the 2004 Act and/or Reg41; to conclude on the LDP revision procedure to be followed based on a clear assessment of what has been considered and what needs to change and why, based on evidence.
Scoping SA	The process of deciding the scope and level of detail of an SA, including the sustainability effects and options which need to be considered, the assessment methods to be used, and the structure and contents of the SA Report.
Service Level Agreement (SLA)	An agreement with a statutory agency which sets the standards which it will aim to meet, and the costs arising. The Planning Inspectorate agrees one with the LPA in respect of an LDP examination, setting out the likely timescales and cost of the examination and providing the LPA with clear guidance on the nature of their own responsibilities.
Short form revision procedure	May be appropriate for circumstances where the issues involved are not of sufficient significance to justify undertaking the full plan revision procedure.
Significant effect	Effects which are significant in the context of the plan (Schedule 1 of the SEA Regulations gives criteria for determining the likely significance of effects on the environment).
Significant Effects Indicator	An indicator that measures the significant effects of the plan.
Single Integrated Plan (SIP)	Discharges statutory duties identified by Welsh Government ("Shared Purpose – Shared Delivery", WG 2012), including Community Strategies; prepared by a Local Service Board. See "Local Well-being Plans" which are to replace SIPs".
Site specific allocations	Allocations of sites (proposals) for specific or mixed uses or development contained in a local development plan. Policies will identify any specific requirements for individual proposals. Allocations will be shown on the LDP's proposals map.
Soundness	In order to be adopted, an LDP must be determined 'sound' by the examination Inspector (S64 of the 2004 Act). Tests of soundness tests and checks are identified in PPW (ch2) and the Manual (ch8).
Stakeholders	Interests directly affected by the LDP (and/or SEA) - involvement generally through representative bodies.
Statement of Common Ground (SocG)	The purpose of a SOCG is to establish the main areas of agreement between two or more parties on a particular issue.
Strategic Environmental Assessment (SEA)	Generic term used internationally to describe environmental assessment as applied to plans and programmes. SEA process is derived from European legislation and defined at European level – Directive 2001/42/EC. The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 (SEA Regulations) require a formal "environmental assessment of certain plans and programmes, including those in the field of planning and land use".
Supplementary Planning Guidance (SPG)	Supplementary information in respect of the policies in an LDP. SPG does not form part of the development plan and is not subject to independent examination but must be consistent with it and with national planning policy.
Sustainability Appraisal (SA)	Tool for appraising policies to ensure they reflect sustainable development objectives (i.e. social, environmental and economic factors). Each LPA is required by S62(6) of the 2004 Act to undertake SA of the LDP. This form of SA fully incorporates the requirements of the SEA Regulations. The term is used in this Manual to include Strategic Environmental Assessment, unless otherwise made clear.
Sustainability Appraisal Framework	This comprises the identified SA objectives against which LDP options are then assessed.
Sustainability Appraisal Report (SA Report)	A document required to be produced as part of the SA process to describe and appraise the likely significant effects on sustainability of

	<p>implementing the LDP, which also meets the requirement for the Environmental Report under the SEA Regulations. S62(6) of the 2004 Act requires each LPA to prepare a report of the findings of the SA of the LDP.</p> <ul style="list-style-type: none"> - The SA Report is first produced at the Preferred Strategy stage (the Interim SA Report), expanded at the Deposit LDP stage and finalised alongside the Adoption Statement.
The 2004 Act	The Planning and Compulsory Purchase Act 2004.
Wales Spatial Plan (WSP)	A plan prepared and approved by the National Assembly for Wales under S60 of the 2004 Act, which sets out a strategic framework to guide future development and policy interventions, whether or not these relate to formal land use planning control. Under S62(5)(b) of the 2004 Act a local planning authority must have regard to the WSP in preparing an LDP.
Workshop	Where a group have the opportunity to engage in group debates and practical exercises with a written or drawn 'output'.