

**REPORT OF THE HEAD OF PARK DIRECTION**

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**SUBJECT: 2018 ANNUAL MONITORING REPORT ON THE PEMBROKESHIRE  
COAST NATIONAL PARK LOCAL DEVELOPMENT PLAN**

**Purpose of Report**

1. The Annual Monitoring Report is a document which is produced by the Authority each October, looking back at the previous financial year, from 1 April to the 31 March.
2. The Report should assess the extent to which the Local Development Plan strategy and policies are being achieved.
3. The Report measures various indicators to assess the performance of the individual planning policies set out in the adopted Local Development Plan and to provide a general portrait of the social, economic and environmental conditions in the Park.
4. 'Key Findings' can be found at the beginning of the document which sets out where issues have arisen and what further action is required. These issues will continue to be addressed as part of the Local Development Plan revision.
5. The 2017 report was made available for comment. The public notice appeared in the Western Telegraph on 24 January 2018 and the consultation closed on 1 June, 2018.
6. The 2018 Monitoring Report is attached.

**Risk considerations**

7. This is a statutory requirement. The annual monitoring report is completed in accordance with Welsh Government regulations and guidance.

**Financial considerations**

8. Local Development Plan monitoring is budgeted for by the Authority.

**Equality considerations**

9. The Public Equality Duty requires the Authority to have due regard to the need to eliminate discrimination, promote equality of opportunity and foster good relations 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 is a monitoring report and does not contain policy, procedure, practice or guidelines.

10. The process for Local Development Plan preparation and its rigorous assessment procedures will however support this approach.

### **Welsh Language considerations**

11. The publication and consultation exercises were carried out in accordance with the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards Regulations (No.1) 2015.

### **Human Rights considerations**

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

13. The process for Local Development Plan preparation and its rigorous assessment procedures will support this approach. This, however, is a monitoring report and does not contain policy, procedure, practice or guidelines.

### **Recommendation**

**That the attached Annual Monitoring Report for the Local Development Plan be approved for submission to the Welsh Government by the 31<sup>st</sup> October 2018.**

#### *Background Documents*

[\*Pembrokeshire Coast National Park Local Development Plan Adopted September 2010\*](#)

[\*Local Development Plan Manual by Welsh Government\*](#)

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

[\*Welsh Statutory Instrument 2015 No.1598 The Town & Country Planning \(Local Development Plan\) \(Wales\) \(Amendment\) Regulations 2015\*](#)

[\*Local Development Plan Monitoring Report 2011, 2012, 2013, 2014, 2015, 2016, 2017\*](#)

[\*Local Development Plan Review Report\*](#)

[\*Local Development Plan Preferred Strategy – Replacement Plan\*](#)

[\*Pembrokeshire Coast National Park - Local Development Plan 2\*](#)

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

Pembrokeshire Coast National Park Authority

Annual Monitoring Report

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




3<sup>rd</sup> October 2018

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## 1. Key Findings

- 1.1. This Annual Monitoring Report assesses the effects of the Local Development Plan against those which were anticipated. This report is for the financial year April 2016 to end of March 2017.
- 1.2. The findings of the Annual Monitoring Reports of 2011, 2012, 2013, 2014, 2015, 2016 and 2017 have been considered by the National Park Authority. The Reports have also considered the Plan's achievement of its sustainability objectives. These reports have fed into the preparation of the National Park Authority's Review Report for the Local Development Plan and the draft replacement Preferred Strategy and Deposit Replacement Plan .<sup>1</sup> The Authority anticipates taking the replacement Plan to Examination in Spring 2019.
- 1.3. No additional changes to policy are required as a result of this monitoring report.
- 1.4. The tables below provide a visual aid of the effectiveness of policies during this Annual Monitoring Report period 2017-2018 using the 36 indicators analysed in the Monitoring Report. Commentary and action points both in the interim and for review stage are provided for those that are underperforming.

Target	Number of Indicators	
Targets / objectives are being achieved.	27	
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.	7	


### Indicator 12b Renewable Heat Target

Policy Area	Indicator 12b	Target	Performance
Renewable Energy Policy 33		(Target - Planning permissions to contribute to an overall Renewable Heat Target for the National Park of 26 GWh.)	
The replacement Local Development Plan identifies the change that is needed to			


<sup>1</sup> See [Local Development Plan 2](#) webpage.

Policy Area		Indicator 12b	Target	Performance
address this issue.				


### Indicator 13 Development in a Floodplain

Policy Area		Indicator 13	Target	Performance
Flooding Policy 34	W	Amount of development (by TAN 15 paragraph 5.1 development category) permitted in C1 and C2 floodplain areas not meeting all TAN 15 tests (paragraph 6.2 i-v)	Development is not permitted where the long term scenario (in the next 60 years) would fail the tests set out in Indicator 13.	
<p><b>Conclusion:</b> The need to reduce risk and not maintain the existing risk nor increase it is an important issue to tackle, particularly in coastal areas where there is likely to be greater and more rapid change and increase in flood risk over time. The Authority is addressing this issue through the Replacement Local Development Plan process and additional policies are included in the Deposit Plan to address applications in flood risk areas.</p>				


### Indicator 17 Visitor Accommodation

Policy Area		Indicator 17	Target	Performance
Visitor Accommodation Policy 35		Counts of hotel spaces, self-catering, caravan and camping spaces (Hotels, self-catering, caravan databases etc.).	Maintain current levels of provision except where loss of hotel proven.	
The replacement Local Development Plan identifies the change that is needed to address this issue.				




## Indicator 20 Effectively Available Housing Land Supply

Policy Area		Indicator 20	Target	Performance
Housing	W <sup>2</sup>	The housing land supply taken from the current Housing Land Availability Study (TAN1)	Minimum 5 years supply.	
The replacement Local Development Plan identifies the change that is needed to address this issue.				


## Indicator 21 Affordable housing and housing delivery

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

## Indicator 22 Development of Site Allocations

Policy Area		Indicator 22	Target	Performance
Site Allocations	W	Amount of development, including housing, permitted on allocated sites in the development plan as a % of development plan allocations and as % of total development	Allocations – 100% permitted by the end of the Plan period on allocated sites.	Housing (22a)  style="text-align: center;"> 
				Employment/Mixed use (22b)  style="text-align: center;"> 
				Community Facilities (22c)  style="text-align: center;"> 

<sup>2</sup> Welsh Government Core Indicator

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



## Sustainability Appraisal

- 1.5. An analysis of how the Plan is contributing to the sustainability appraisal objectives can be found in Chapter 3.
- 1.6. An analysis of how the Local Development Plan is contributing to the sustainability appraisal objectives has identified no substantial issues for this monitoring period. Within the scope of the Local Development Plan, and its associated supplementary planning guidance documents, it is generally contributing positively to the sustainability appraisal objectives.

## Consultation and Further Information

- 1.7. The Monitoring Report is made available to relevant statutory bodies, stakeholders and individuals and is published on the Authority's web site. Comments on the 2018 document are invited and will inform the production of the next report in 2019 and the Local Development Plan revision. Any comments and queries relating to this Monitoring Report should be addressed to:

Park Direction Service  
Pembrokeshire Coast National Park Authority  
Llanion Park  
Pembroke Dock  
Pembrokeshire  
SA72 6DY  
Tel 01646 624800  
email [devplans@pembrokeshirecoast.org.uk](mailto:devplans@pembrokeshirecoast.org.uk)

## Consultation on the 2017 Monitoring Report




- 1.8. The 2017 Monitoring Report was made available for comment to relevant statutory bodies, stakeholders and individuals and was published on the Authority's web site. No adverse comment was received. Support for continued joint working with Pembrokeshire County Council on cross boundaries issues at Fishguard and Goodwick was highlighted.

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

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

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

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

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

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

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

# National Park Purposes and Duty and the Spatial Strategy

## Key Outcomes

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

## Context

2.4 Future Landscapes: Delivering for Wales May 2017: The most recent statement from the Welsh Government was when the Minister for Environment made an oral statement in the Senedd on Designated Landscapes on the 12<sup>th</sup> March 2018.. Pertinent extracts are: *'During both that debate and preceding reviews, the future protection of these areas under this Government has been called into question. Today, I confirm unequivocally that all the existing designated landscapes will be retained and their purpose of conserving and enhancing natural beauty will not be weakened.'* ....*'Whilst I do not discount the symbolism of a new economic purpose, I have seen insufficient evidence that the existing purposes are a barrier to practical delivery. For that reason, and given the uncertain context, I am not prepared to pursue a change of this nature now without broader support. Therefore, I intend to retain the existing purposes of national parks, along with the Sandford principle and retain the existing purpose of AONB. This doesn't mean there is not a need for park authorities or AONB partnerships to pursue activity that supports the social and economic resilience of communities in their areas. They should, and there is no barrier to them doing so within their existing purpose. That said, there is a need to improve the connection between the existing purposes, including biodiversity conservation and the framework within the environment Act. To achieve this, I am minded to introduce legislation at a future opportunity to require the park authorities and AONBs to apply the principles of the sustainable management of natural resources, in particular when preparing their statutory management plans.'* *'I also wish to strengthen the status and scrutiny of the management plans, requiring the plans to identify the special qualities. I believe this approach will align the parks and AONBs with our legislation here in Wales, and the international obligations from which it is drawn, in a way that brings them fully on board with the contemporary understanding of ecosystems and landscapes whilst recognising the enduring value of their original purpose. It will strengthen the importance of the special qualities in decision making across all activities in both national parks and AONBs.'* .. , *'I intend to publish a policy statement which will bring the review process to a close.'*


2.5 Officers will need to monitor progress made with the preparation of the policy statement by Welsh Government and will rely on the current policy statement<sup>3</sup> in the interim. The Authority is taking into account the new Environment Act 2016 in the preparation of the replacement Local Development Plan. The adopted and replacement Local Development Plan sets out the National Park's special qualities as taken from the current Management Plan.


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<http://www.pembrokeshirecoast.wales/Files/files/Dev%20Plans/LDP2/background%20papers/Policy%20statement%20%20final%20cover%20and%20statement%20english.pdf>


## Policy Performance

Policy Area		Indicator 1	Target	Performance
All		Decisions contrary to recommendation.	0 decisions contrary to recommendation	
<p><b>Trigger:</b> 3% of planning applications<sup>4</sup> decided contrary to recommendation in any one year.</p> <p><b>Reason:</b> To identify patterns over the Annual Monitoring Report period.</p> <p><b>Analysis:</b> During the period April 2017 to March 2018 556 planning applications were determined by the Authority. 0.5% of applications (3) were decided contrary to recommendation.</p> <p><b>Conclusion:</b> The Authority's application of policy positively supports the strategy of the Plan and achievement of its key outcomes.</p>				

Policy Area		Indicator 2	Target	Performance
National Park Purposes & Duty		Developments which engage the Sandford Principle – where conflict between the two national park purposes becomes acute, the first one must prevail. Carrying out the socio-economic duty in National Parks must be in pursuance of the purposes to Policy 1 ( <b>overarching indicator</b> ).	Target - 0 approvals within or impacting on the National Park which breach the Sandford principle or which result in conflicts between the duty and purposes. ( <b>overarching target</b> )	
<p><b>Trigger:</b> 0 applications approved contrary to the Sandford Principle in any one year.</p> <p><b>Reason:</b> The Sandford Principle is a central component of the National Park purposes and 1995 Environment Act.</p> <p><b>Analysis:</b> No planning applications with a decision date between 1 April 2017 and 31 March 2018 have engaged or breached the Sandford principle.</p> <p><b>Conclusion:</b> The National Park Authority's application of policy positively supports the strategy of the Plan and achieving its key outcomes.</p>				


<sup>4</sup> Full, outline or reserved matters applications.

Policy Area	Indicator 3a	Target	Performance
Policy 35c) (Strategy Policy)	Policy 35c) Prioritising affordable housing over self-catering	Target - 0 approvals contrary to policies that prioritise certain uses seen to sustain communities in the Plan.	
<p><b>Trigger:</b> Approval of 2 applications contrary to policy 35 c) in any one year.  <b>Reason:</b> This policy provides a windfall opportunity for affordable housing and with limited land available for development early scrutiny of the policy is appropriate.</p> <p><b>Analysis:</b> There were no applications approved contrary to policy 35c) during this monitoring period.  <b>Conclusion:</b> The Authority's application of policy positively supports the strategy of the Plan and achievement of its key outcomes.</p>			

Policy Area	Indicator 3b	Target	Performance
Policy 42d) & Policy 44 third last paragraph	Policy 42d) & Policy 44 third last paragraph - Prioritise community uses or affordable housing when re-using employment sites.	0 approvals contrary to policies seen to protect and provide for community facilities and infrastructure	
<p><b>Trigger:</b> Approval of 2 planning applications contrary to the policy 42d) or Policy 44 third last paragraph in any one year.  <b>Reason:</b> The National Park does not contain many large scale employment uses and any loss to other uses must continue to support the local community. They are valuable to individual communities and a stringent threshold is appropriate.</p> <p><b>Analysis:</b> No approvals contrary to this policy were recorded during 2017 to 2018 monitoring period.  <b>Conclusion:</b> The Authority's application of policy positively supports the strategy of the Plan and achievement its key outcomes.</p>			

Policy Area	Indicator 3c	Target	Performance
Policy 45 & Policy 42	Housing & Employment	Use targets for the delivery of affordable housing and employment.	
Please see analysis under Indicators 21 and 22.			

Policy Area		Indicator 3d	Target	Performance
Policy 48		Community Facilities & Infrastructure Requirements.	0 approvals contrary to policies seen to protect and provide for community facilities and infrastructure	
Please see analysis under Indicator 25.				

Policy Area		Indicator 4	Target	Performance
Policy 2 to 7		Effectiveness of Policies (Policy 2 to 7) & Supplementary Planning Guidance (Accessibility Assessment) when dealing with Applications at Appeals.	Inspector does not raise issues regarding the effectiveness of the policies or supporting supplementary planning guidance.	
<p><b>Analysis:</b> In the period April 2017 to March 2018 three appeal decisions cited Local Development Plan Policy 7 Countryside, none cite Supplementary Planning Guidance within this group. Of the three decisions, two were allowed and one was dismissed. Both of the allowed decisions were due to a difference in judgement rather than raising issues with Policy 7.</p> <p>One considered whether a housing plot represented a rounding off opportunity, which the Inspector considered that it did and caused no landscape harm. The other referred to the change from a static caravan to a timber lodge, where the Inspector did not agree with the Authority's consideration that the timber lodge fell outside of the definition of a caravan and that an unacceptable landscape impact had been caused.</p> <p><b>Conclusion:</b> No appeal decisions dispute the appropriateness of the policies for consideration in these decisions, nor their effectiveness. There is no evidence to suggest the policies and guidance in this grouping are not performing at appeals.</p>				

## 2A Special Qualities


### Key outcome


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

### Context

2.6 Future Landscapes: Delivering for Wales May 2017 Please see commentary under National Park Purposes and Spatial Strategy.

### Policy Performance

Policy Area	Indicator 5	Target	Performance
Policy 8 (Strategy Policy)	Approvals contrary to Strategy Policy 8 Special Qualities. Approvals contrary to Recommendation.	0 approvals	
<p><b>Trigger:</b> 2 developments permitted contrary to any criterion in any one year.  <b>Reason:</b> The Special Qualities are central to National Park Purposes set out in the Environment Act 1995.</p>			
<p><b>Analysis:</b> In the period 1<sup>st</sup> April 2017 to 31<sup>st</sup> March 2018, no approvals were given contrary to recommendation which referred to Policy 8.</p>			
<p><b>Conclusion:</b> No approval has been given contrary to Strategy Policy 8 Special Qualities. The target for this monitoring period has been met.</p>			

Policy Area	Indicator 6	Target	Performance
Policy 8 to 18	Effectiveness of Policies (Policy 1 and Policies 8 to 18) & Supplementary Planning Guidance (Landscape Character, Conservation Area Proposals, Regionally Important Geodiversity Sites and Historic Environment) when dealing with Applications at Appeals.	Inspector does not raise issues regarding the effectiveness of the policies or supporting supplementary planning guidance.	

**Analysis:** In the period April 2017 to March 2018, five appeal decisions cited Local Development Plan policies (one of which for an Enforcement Notice), one also cited the Landscape Character Assessment Supplementary Planning Guidance. Two appeals were dismissed, two were allowed and the appeal against an Enforcement Notice on a car park constructed without planning permission, was partly allowed for an extension of time to comply with the notice, but was upheld on other grounds. Of the other two allowed appeals, one considered whether a housing plot represented a rounding off opportunity, which the Inspector considered in this case that it did and caused no landscape harm. The other referred to the change from a static caravan to a timber lodge, where the Inspector did not agree with the Authority's consideration that the timber lodge fell outside of the definition of a caravan and that an unacceptable landscape impact had been caused.

**Conclusion:** No appeal decisions dispute the appropriateness of the policies for consideration in these decisions, nor their effectiveness. There is no evidence to suggest the policies and guidance in this grouping are not performing at appeals.



## 2B Major development, the potential for growth

### Key outcomes

- (1) No new major development in the National Park unless there are exceptional circumstances.<sup>5</sup>
- (2) The provision of waste facilities to cater for National Park generated needs or to work with the County Council to provide waste facilities serving both areas outside the National Park.

### Context

**2.7 Minerals:** Major infrastructure projects that may put additional pressure on existing reserves include the Swansea Tidal Lagoon, Cardiff area proposals such as the Metro link and Airport link, the M4 relief road, Wylfa Newydd Nuclear Power Station, City Region projects and Hinckley Point power station. Progress on these projects is varied and uncertain in some cases. The annual monitoring of reserves and the review of the Regional Technical Statement for the North and South Regional Aggregate Working Parties (expected between August and December 2019) will continue to inform planning decisions on a regional and national basis.

2.8A letter was sent out to mineral operators in Pembrokeshire with the 2016 Annual Survey forms for aggregate sales, inviting expressions of interest in taking forward new terrestrial sand and gravel operations in South West Wales. However, this produced no responses. This letter will be re-sent to all operators in South West Wales with the next Annual Survey forms. Advertising for Candidate Sites for the neighbouring authority's replacement Local Development Plans will also provide a further opportunity for expressions of interest to be logged.

**2.9 Waste:** The South West Wales Region Waste Planning Monitoring Report (2018) was submitted to Welsh Government in March 2018, but is yet to be published. The previous report (April 2016), based on data from 2015/16, highlights the following key findings:

- Overall, the region is meeting targets in respect of reducing local authority collected waste, increasing recycling and composting and reducing landfilled biodegradable municipal waste, reusing, recovering and recycling industrial and commercial waste and construction and demolition waste and reducing the amounts of hazardous waste landfilled.
- There is insufficient capacity in 'other recovery' facilities in the region. The economic case for creating further capacity within the region is weakened by existing contracts and the subsequent lack of sufficient waste available.


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<sup>5</sup> See [Planning Policy Wales, Edition 9, November 2016](#), paragraphs 5.5.6 and 14.3.2; Minerals Technical Advice Note 1: Aggregates 2004, paragraph 52; Mineral Technical Advice Note (MTAN) Wales 2: Coal, paragraphs 74 to 79, page 159, Circular 125/77 Roads and Traffic – National Parks.

- There is a similar case for food waste in the region following recent developments such as Agrivert's Stormy Down facility which takes waste from several authority areas.
- The predicted remaining landfill capacity for the region is 15 years, which is safely above the threshold for considering new sites. However, this figure is dependant on several assumptions and as such continuous monitoring is required.

2.10 **Marine planning:** Welsh Government published a consultation draft Wales National Marine Plan in December 2017. The National Park Authority will await the final version of the Welsh National Marine Plan to consider any matters that require review in the Local Development Plan. On 1st April 2018, Welsh Ministers became the marine licensing authority in the Welsh offshore region under the Wales Act 2017. The administration of marine licence applications, including protected species licensing, is now transferred from the Marine Management Organisation to Natural Resources Wales, who will act on behalf of the Welsh Ministers.


### Policy Performance

Policy Area	Indicator 7	Target	Performance
Major development	Approvals of proposals that engage Major Development Test	0 approval of major development unless exceptional circumstances are proven.	
<p><b>Trigger:</b> Approval of 1 major development where no exceptional circumstances are shown in any one year.</p> <p><b>Reason:</b> To ensure a consistent approach with first purpose and Planning Policy Wales Major Development test.</p> <p><b>Analysis:</b> Between April 1<sup>st</sup> 2017 and March 31<sup>st</sup> 2018 no application for a major development, as defined in Planning Policy Wales was approved.</p> <p><b>Conclusion:</b> There are no issues arising regarding the policy framework of the Plan.</p>			

Policy Area	Indicator 8	Target	Performance
Minerals	Applications for minerals development	0 approval for new minerals development unless exceptional circumstances are proven.	
<p><b>Trigger:</b> 1 new or extended mineral site permitted when exceptional circumstances are not shown in any one year.</p> <p><b>Reason:</b> This would have a major impact on the minerals strategy. The trigger would not include borrow pits.</p>			

**Analysis:** There have been no approvals from April 2017 to March 2018 for a new or extended mineral site.

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

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

**Analysis:** In the period April 2017 to March 2018 no appeal decisions cited policies or guidance within this group.

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

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

### Key outcomes

- a) Development achieving high standards in terms of sustainable design. With all new dwellings meeting the standards set out in national planning policy.<sup>6</sup>
- b) The National Park contributing to renewable energy generation.<sup>7</sup>
- c) No vulnerable development<sup>8</sup> in areas which would be at risk of flooding both now and in the long term and with no negative impacts elsewhere.

### Context

2.11 **Targets for Renewable Energy:** The targets within Indicators 12a and 12b were derived from a study entitled 'Development of a Renewable Energy Assessment and Target Information for the Pembrokeshire Coast Local Development Plan' (2008). This study has been updated. The updated study concludes that, for technologies that would require planning permission, the generation potential of renewable electricity within the National Park has significantly increased and the potential for renewable heat energy has significantly decreased from the 2008 estimates. This has been reflected in the revised Indicators 12 and 13 within the Deposit Local Development Plan 2.<sup>9</sup>

### Policy Performance

Policy Area	Indicator 10	Target	Performance
Sustainable Design Policy 29	Incorporation of renewable energy technology within scheme	Relevant schemes incorporating renewable energy technologies.	N/A
<p>Given the emphasis in Technical Advice Note 12, July 2014 on developers needing to look to achieve the minimum carbon standard through passive design and energy efficiency first, before considering how further emission savings can be achieved through the use of low and zero carbon energy technologies this indicator is no longer considered appropriate (paragraph 5.4.4 of Technical Advice Note). A revised indicator for the Deposit Local Development Plan 2 Policy 30 Sustainable Design has been included, to enable a meaningful monitoring of the policy in contributing towards sustainable design in all development.<sup>10</sup></p>			

<sup>6</sup> The Welsh Government expects the required standards to be made progressively higher over time, in pursuit of its aspiration for all new buildings to be "carbon neutral" by 2011.


<sup>7</sup> Please see the Monitoring Section of the Plan. Likely contributions are taken from the Renewable Energy Assessment web link: <http://www.pcnpa.org.uk/website/default.asp?SID=1317&SkinID=5>


<sup>8</sup> 'Vulnerable developments' are defined in the Technical Advice Note 15: Development and Flood Risk on flooding, please see Figure 2 page 7: web link [http://new.wales.gov.uk/docrepos/40382/epc/planning/403821/40382/403821/\(560\)\\_july04-tan15-e.pdf?lang=en](http://new.wales.gov.uk/docrepos/40382/epc/planning/403821/40382/403821/(560)_july04-tan15-e.pdf?lang=en)

<sup>9</sup> See [Local Development Plan 2](#) webpage.

<sup>10</sup> See [Local Development Plan 2](#) webpage.

Policy Area		Indicator 11	Target	Performance
Sustainable Design Policy 29		Compliance with code for sustainable homes <sup>11</sup>	Target - 100% meeting national policy requirements	N/A
<p><b>Trigger:</b> Failure to achieve across 100% of residential developments.</p> <p><b>Reason:</b> Requirement of Planning Policy Wales Technical Advice Note 22: Planning for Sustainable Buildings.</p> <p><b>Analysis/Conclusion:</b> This indicator is no longer relevant for this monitoring period, due to the changes to national planning policy. A revised indicator for the replacement Local Development Plan Policy 29 Sustainable Design is being drafted, to enable a meaningful monitoring of the policy in contributing towards sustainable design in all development.<sup>12</sup></p>				

Policy Area		Indicator 12a	Target	Performance
Renewable Energy Policy 33		Capacity of renewable energy schemes permitted and completed.	Planning permissions to contribute to an overall Renewable Electricity Target for the National Park of 4.91GWh.	

Policy Area		Indicator 12b	Target	Performance
Renewable Energy Policy 33		As above for Indicator 12a	(Target - Planning permissions to contribute to an overall Renewable Heat Target for the National Park of 26 GWh <sup>13</sup> .)	

<sup>11</sup> This includes better management of surface water run-off to cope with the impacts of climate change.

<sup>12</sup> See [Local Development Plan 2](#) webpage.

<sup>13</sup> This target taken from Appendix 4 of the Local Development Plan has been amended in this Annual Monitoring Report from 'between 35.2 and 40.7 GWh' to 26 GWh to reflect that many types of proposals that could previously be monitored through the planning system now have permitted development rights. Annual Monitoring Report 2013 explains in further detail. The Local Development Plan monitoring framework will require amendment to reflect this change in the replacement Local Development Plan. Please also see commentary in the context section above.

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

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

**Analysis:** Electricity Generation Gwh (estimate) equals an estimated 7.85 Gwh/year if all the permissions granted since 2006 are implemented. This is an increase of 0.057 Gwh from the previous monitoring period. The proposals in this monitoring period are primarily for small scale solar photovoltaics that have been incorporated into general building design. There was also one stand alone 4Kw domestic array approved.


Heat Generation per annum Gwh (estimate) equals an estimated 4.239 Gwh/year, this is an increase of 0.0035 Gwh from the previous monitoring period from two domestic solar thermal systems. The anticipated applications for example for larger biomass boilers to schools have not been forthcoming. However, a positive policy framework remains in place.


The approach to Plan policy preparation was to ensure that the Authority was encouraging and supportive of renewables unless there is overriding environmental or amenity issues. An analysis of approvals versus refusals shows that since 2006 there have been an estimated 32 refusals of permission and 182 approvals for various types of renewable energy. This is an increase of 7 approvals and no refusals from the previous monitoring period. However Local Development Plan Policy 33 was only quoted in a total of 6 decisions in this monitoring period, 1 decision quoted the Renewable Energy SPG but not the LDP Policy 33, all but one of the approved applications were for schemes which incorporated renewable energy technology as part of a wider proposal.

**Conclusion:** The Plan has exceeded the electricity generation target (if all those with permission are assumed to have been constructed) but remains significantly behind on heat generation. The sum of estimated contributions from solar thermal, biomass and heat pumps have formulated the above heat generation target. The updated study referred to in the Context section of this Chapter has informed updates to Indicators in the Deposit Local Development Plan.<sup>14</sup> Development interest for solar panels, biomass and anaerobic digestion still exists although demand for wind turbines has significantly decreased in the last four to five years. The estimated generation per annum of renewable technologies has been derived by using the Capacity Factors outlined in Appendix 1 of the updated Renewable Energy Assessment (January 2016).



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<sup>14</sup> See [Local Development Plan 2](#) webpage.

Policy Area		Indicator 12c	Target	Performance
Renewable Energy Policy 33		Renewable Energy Supplementary Planning Guidance and Cumulative Impact of Wind Turbines on Landscape and Visual Amenity Supplementary Planning Guidance	All decision making is consistent with the Authority's Renewable Energy Supplementary Planning Guidance and Cumulative Impact of Wind Turbines on Landscape and Visual Amenity Supplementary Planning Guidance	
<p><b>Trigger:</b> 3 or more decisions contrary to Policy 33 as supported by the Renewable Energy supplementary planning guidance.</p> <p><b>Reason:</b> Although the contribution provided by renewables is important it is difficult to monitor (see above). A more meaningful measure is how effective the Renewable Energy Supplementary Planning Guidance will be (adopted October 2011) in providing a supportive context for renewables provision while protecting the special qualities of the National Park. Deciding applications contrary to Policy 33 as supported by this Supplementary Planning Guidance should trigger a review.</p> <p><b>Analysis:</b> A review of permissions granted and refused for renewable energy schemes during the monitoring period (April 2017 to March 2018) shows that the Renewable Energy Supplementary Planning Guidance was cited in three decisions, all of which were approved. These were for domestic scale schemes, one stand alone solar array and two which incorporated solar technology within wider proposals. No decisions conflict with the Supplementary Planning Guidance.</p> <p>There were no significant applications for wind turbines received within this period and as such, the 'Cumulative Impact of Wind Turbines on Landscape and Visual Amenity' Supplementary Planning Guidance has not been cited.</p> <p><b>Conclusion:</b> The policy context and supplementary planning guidance continues to provide a positive framework for renewable energy generation. Development interest for solar panels, biomass and anaerobic digestion still exists although demand for wind turbines has significantly decreased in the last three to four years.</p>				


Policy Area		Indicator 13	Target	Performance
Flooding Policy 34	W	Amount of development (by TAN 15 paragraph 5.1 development category) permitted in C1 and C2 floodplain areas not meeting all TAN 15 tests (paragraph 6.2 i-v)	Development is not permitted where the long term scenario (in the next 60 years) would fail the tests set out in Indicator 13.	

Policy Area		Indicator 13	Target	Performance
<p><b>Trigger:</b> 1 development permitted contrary to Policy 34.  <b>Reason:</b> Can be severe consequences of inappropriate development. This is a Welsh Government indicator.</p>				
<p><b>Analysis:</b> One application seeking the intensification of an existing residential use at a property in Amroth was considered by the National Park Authority in January 2018. The Development Management Committee was minded to grant planning permission contrary to Officer recommendation – this was confirmed at the March 2018 Development Management Committee meeting. The site is wholly within a C2 flood zone and based on the information contained in the South Wales Shoreline Management Plan is also at risk from inundation from the sea – a risk which is predicted to increase in the future due to climate change and sea-level rise. Members’ reasons for granting permission were that the accommodation would house the same number of people and they felt that the alterations to the property would be more likely to reduce risk rather than increase it. Greater weight was placed on the well-being of the existing business, considering the financial risk was with the applicant.</p> <p><b>Conclusion:</b> The need to reduce risk and not maintain the existing risk nor increase it is an important issue to tackle, particularly in coastal areas where there is likely to be greater and more rapid change and increase in flood risk over time. The Authority is addressing this issue through the Replacement Local Development Plan process and additional policies are included in the <a href="#">Deposit Plan</a> to address applications in flood risk areas.</p>				

Policy Area		Indicator 14	Target	Performance
Location of Growth	W	Percent of new development permitted on previously developed land.	33% of the housing land supply on previously developed land. 45% of the employment land on previously developed land.	Housing  Employment 
<p><b>Trigger:</b> Failure to achieve the targets of 33% and 45% by the formal plan review period.  <b>Reason:</b> A limited supply of development land means an assessment would be appropriate.</p>				
<p><b>Analysis:</b></p> <p><b>Housing:</b> 17.2% of residential units completed were on greenfield sites and 82.8% on brownfield sites when this target was considered at Plan Review. The Plan is well ahead of the target for residential development permitted. In the 2015/16 monitoring period 82.2% of housing completions were on brownfield sites and in 2016/17 85% were on brownfield sites, indicating a continuing positive trend. The 2017/18 figures</p>				



Policy Area	Indicator 14	Target	Performance
			show that 79% of housing completions were brownfield sites and 21% greenfield sites.  <b>Employment related uses:</b> During 2016/17 the proportion of applications approved on greenfield sites was 23% and 77% on brown field. The target has been met. During the 2017/18 monitoring period the proportion of applications approved on greenfield sites was 39% and 61% on brownfield sites. The target therefore continues to be met.  <b>Conclusion:</b> No change is required in approach to achieve brownfield targets for housing or for employment related uses.

Policy Area	Indicator 15	Target	Performance
Policy 29 to 34	Effectiveness of Policies (Policy 29 to 34) & Supplementary Planning Guidance (Sustainable Design Guidance, Renewable Energy, Cumulative Impact of Wind Turbines on Landscape and Visual Amenity) at Appeals and when dealing with Applications	Inspector does not raise issues regarding the effectiveness of the policies or supporting supplementary planning guidance.	
<p><b>Analysis:</b> In the period April 2017 to March 2018, five appeal decisions cited Local Development Plan policies within this group. Two appeals were dismissed, two were allowed and one appeal against an Enforcement Notice on a car park constructed without planning permission, was partly allowed for an extension of time to comply with the notice, but was upheld on other grounds.</p> <p>Of the other two allowed appeals, one considered whether a housing plot represented a rounding off opportunity, which the Inspector considered in this case that it did and caused no landscape harm. The other considered the impact of a change of use from A1 to A3 use within the designated Town Centre of Tenby, where the Inspector differed from the authority in her judgement on the impact upon existing amenity levels and the suitability of parking arrangements.</p> <p><b>Conclusion:</b> No appeal decisions dispute the appropriateness of the policies for consideration in these decisions, nor their effectiveness. There is no evidence to suggest the policies and guidance in this grouping are not performing at appeals.</p>			

## 2D Visitor economy, employment and rural diversification

### Key outcomes

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

### Context

2.12 **Economy** – The Local Development Plan Review Report identifies that the target set out in the Local Development Plan to have 33% of the employment/mixed use allocations with planning permission by the end of the 2014/15 financial year has not been achieved. Reasons for sites not being developed include landowner decisions, non-viability and lack of public funding to develop sites. In updating the evidence base for the replacement Local Development Plan, it appears that the need is for ready-built premises for small and micro-businesses in the National Park, rather than for land allocations. This issue is being fully considered through the revision to the Plan which is also taking into account updates to National Planning Policy (Planning Policy Wales 9).<sup>15</sup>

2.13 **Chalet, Caravan and Camping Sites:** Against a backdrop of the National Park Authority's policy of restraint on new caravan, camping and chalet sites in the National Park there has been a significant increase in the number of unauthorised sites being reported. There continues to be a number of successful applications for certificates of lawful use for tent and caravan sites in the last few years which has increased the number of pitches available in this sector considerably. There is also a trend towards glamping and camping pods, although more traditional accommodation types appear to remain popular. The National Park Authority commissioned a study in 2015/16 to examine the capacity of the National Park landscape to accommodate more camping and caravanning sites. The study has concluded that there is very limited capacity within the landscape for further camping sites or extensions to existing sites. The outcome of the study and the changing demands of camping and caravanning and any changes required to the current policy is being fully considered through the revision of the Local Development Plan<sup>16</sup>.

2.14 **Employment Land Review:** Pembrokeshire County Council included the National Park area in its annual Employment Land Review in 2017. The study concluded that just over 93% of available employment land in the National Park was in use, with a vacancy rate of slightly less than 5%. National Planning Policy recognises that market forces do not respect local authorities boundaries and the planning system should steer development to the most efficient and sustainable locations. Across Pembrokeshire the 2017 survey found there to be 199.53ha of vacant land, a decrease of 8.4% since 2016, mainly attributable to the takeup of small sites outside the main towns outside the National Park. The majority of sites are located within the Milford Haven Waterway area (Pembroke, Pembroke Dock and Milford Haven) and most of the rest, as would be expected and consistent with national planning policy, focussed in and around the larger settlements in Pembrokeshire County



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<sup>15</sup> See [Local Development Plan 2](#) webpage.

<sup>16</sup> See [Local Development Plan 2](#) webpage.

Council's planning area such as Haverfordwest, Fishguard and Neyland. The majority of the land identified for the study was in B2 use (general industrial) which was dominated by the very large South Hook Liquefied Natural Gas site. Further details are available in the Study Report<sup>17</sup>.


## Policy Performance


Policy Area	Indicator 16	Target	Performance
Policy 43	Loss of employment sites	0 approvals of loss of employment sites except where justified within the terms of the policy.	
<p><b>Trigger:</b> Loss of two or more employment sites or 500 sq. metres contrary to recommendation</p> <p><b>Reason:</b> Small employment sites can make an important contribution to sustainable communities.</p> <p><b>Analysis:</b> There have been no permissions granted resulting in the loss of employment sites which are contrary to Policy 43 of the Plan during this monitoring period.</p> <p><b>Conclusion:</b> Decisions made have been consistent with the policy.</p>			
Policy Area	Indicator 17	Target	Performance
Visitor Accommodation Policy 35	Counts of hotel spaces, self-catering, caravan and camping spaces (Hotels, self-catering, caravan databases etc.).	Maintain current levels of provision except where loss of hotel proven.	
<p><b>Trigger:</b> 1 or more developments contrary to recommendation in any one financial year.</p> <p><b>Reason:</b> The impact of such development changes on National Park purposes. There is a need to maintain current provision.</p> <p><b>Analysis:</b></p> <p>There have been 2 Certificate of Lawful Development applications granted for camping and caravanning sites in the current monitoring period adding 1 permanent and up to 30 seasonal pitches to the supply. The policy position would not allow such sites to be established. The Authority is working with Pembrokeshire County Council and other Camping and Caravanning and tourism bodies to address the issue. A National Park Officer has also been visiting all caravanning and camping sites to advise owners of the relevant regulations and checking for breaches of</p>			

<sup>17</sup> Pembrokeshire Employment Survey Report 2017 – <https://www.pembrokeshire.gov.uk/adopted-local-development-plan/implementation-and-monitoring>

planning permission. The policy position is being fully considered through the revision of Local Development Plan. The [Deposit Local Development Plan 2](#) includes revised policies supported by a 2015 study which assessed the landscape capacity of the National Park to accommodate more camping and caravanning sites.

**Conclusion:** The Authority needs to continue to address this issue comprehensively through liaison with Pembrokeshire County Council and other organisations and by continuing to monitor and carry out enforcement actions on unauthorised sites and pitches. The policy position is also being revisited through the replacement Local Development Plan.<sup>18</sup>

Policy Area	Indicator 18	Target	Performance
Special Qualities Policy 8	Proposals for recreational activity contrary to Policy 8.	0 approvals	
<p><b>Trigger:</b> 2 or more recreational activity developments contrary to the Recreational Activities Supplementary Planning Guidance</p> <p><b>Reason:</b> The special qualities (Environment Act 1995) could be significantly affected by such development.</p> <p><b>Analysis:</b> The target has been met during the monitoring period with 0 approvals contrary to Policy 8 and the Recreation and Leisure Activities Supplementary Planning Guidance (2013-2014).</p> <p><b>Conclusion:</b> Decisions made have been consistent with policy.</p>			

Policy Area	Indicator 19	Target	Performance
Policy 35 to 43	Effectiveness of Policies (Policy 35 to 43) & Supplementary Planning Guidance (Recreational Activities, Loss of Hotels) when dealing with Applications and at Appeals	Inspector does not raise issues regarding the effectiveness of the policies or supporting supplementary planning guidance.	
<p><b>Analysis:</b> In the period April 2017 to March 2018 two appeal decisions cited policies within this group. One appeal against an Enforcement Notice on a car park constructed without planning permission, was partly allowed for an extension of time to comply with the notice, but was upheld on other grounds including its conflict with</p>			

<sup>18</sup> See [Local Development Plan 2](#) webpage.

Policy 35 Visitor Economy. The other appeal decision considered a retrospective application for a yurt, platform, washroom and interpretation panel. The decision referenced Policy 35 Visitor Economy and 38 Camping, Touring Caravans, Statics and Chalet Sites, the appeal was dismissed due to its conflict with these policies and landscape impact.

**Conclusion:** No appeal decisions dispute the appropriateness of the policies for consideration in these decisions, nor their effectiveness. There is no evidence to suggest the policies and guidance in this grouping are not performing at appeals.

## 2E Affordable housing and housing growth

### Key outcomes


- a) An estimated 1,600 new dwellings are provided of which a minimum of 530 new affordable homes are provided.<sup>19</sup>
- b) If by the end of the financial year 2014/15 the number of affordable homes built or under construction is below 80% of the proportion of the overall target for the Plan period which should be available by that date, the Authority will immediately commence a review of the Affordable Housing Strategy Policy.
- c) A higher density of development is achieved – a minimum of 30 dwellings to the hectare in the Local Development Plan's Centres<sup>20</sup>.

### Context

2.15 Housing Market: The nature of the housing market over the lifespan of the Local Development Plan is and will be the subject of much conjecture and conflicting forecasts. The link below provides detailed commentary on housing starts and completions in Wales recently.<sup>21</sup>

2.16 Supplementary Planning Guidance Affordable Housing: The guidance sets out the circumstances where it will be necessary to review the guidance through monitoring of key indicators (see section 6). The current revision of Local Development Plan 1 is providing an opportunity to set out new affordable housing provision figures for Local Development Plan 2.

### Policy Performance

Policy Area		Indicator 20	Target	Performance
Housing	W	The housing land supply taken from the current Housing Land Availability Study (TAN1)	Minimum 5 years supply.	
<p><b>Trigger:</b> Less than a 5 year supply in any one year.  <b>Reason:</b> It is important to deliver the affordable housing strategy.  <b>Analysis:</b> The Authority is required to demonstrate a five year effectively available housing land supply.</p> <p>The 2018 Study shows a 1.4 year land supply. The Plan will end part-way through</p>				

<sup>19</sup> In 2014 the National Park Authority adopted new supplementary planning guidance on affordable housing the application of which would reduce the ability of the Local Development Plan to achieve its targets for affordable housing provision.


<sup>20</sup> See Local Development Plan. Glossary of Terms

<sup>21</sup> <http://gov.wales/statistics-and-research/new-house-building/?lang=en>

the Joint Housing Land Availability Study period (2021 Plan end date) and so the method of calculation takes this into account (as set out in Table 4 of Technical Advice Note 1).

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

**Conclusion:** For Local Development Plan revision this has meant revisiting the overall housing land requirements and consequently the Plan’s housing provision and acknowledging uncertainties in the housing market in setting annual targets – see Review Report and draft replacement Local Development Plan and supporting evidence.<sup>22</sup>

Policy Area		Indicator 21	Target	Performance
Housing	W	The number of net additional affordable and general market dwellings built(TAN 2).	530 affordable dwellings over the Plan period.  1000 general market dwellings built. In total an annual completion rate of 90 per annum.	Actions are proposed to improve delivery  
<p><b>Trigger:</b> If by the end of the financial year 2014/15 the number of affordable homes built or under construction is below 80% of the proportion of the overall target for the Plan period which should be available by that date, the Authority will immediately commence a review of the Affordable Housing Strategy Policy.</p> <p><b>Reason:</b> Milestone contained in the Inspector’s report on the Local Development Plan.</p>				
<p>Analysis:</p> <p><b>Overall Completions:</b> Overall completions for housing (market and affordable) since 2007 have totalled 619 (i.e. until April 2018), 62% of the overall target which was 90 per annum over 11 years (1000).</p> <p>There are however issues with site deliverability (allocations in particular) which has been recognised and are being addressed in the emerging Local Development Plan 2.<sup>23</sup></p>				

<sup>22</sup> See [Local Development Plan 2](#) webpage.

<sup>23</sup> See [Local Development Plan 2](#) webpage.





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

The adoption of supplementary planning guidance on affordable housing means that the target is not attainable taking account of the lowered affordable housing numbers achievable as a result of what was considered viable as at 2014.

Completions of affordable dwellings totalled 90 by the end of the financial year 2017 to 2018.

On affordable housing contributions these are held and administered by Pembrokeshire County Council. Current earmarked projects include Tenby, St Davids and Newport. The latest report to the County Council's cabinet sets out the detail.<sup>24</sup>

**Conclusion:** The Authority's Review Report for the Local Development Plan and the draft replacement Deposit Local Development Plan identifies the emerging changes<sup>25</sup>. The monitoring of progress of sites in the current Local Development Plan will continue – see Appendix 2.

Policy Area		Indicator 22	Target	Performance
Allocation Sites Tables	W	Amount of development, including housing, permitted on allocated sites in the Development Plan as a % of Development Plan allocations and as % of total development permitted (ha and units).	Allocations – 100% permitted by the end of the Plan period on allocated sites.	Housing (22a) 
				Employment/Mixed use (22b) 
				Community Facilities (22c) 
				Road & Cycle Schemes (22d) 

<sup>24</sup> <http://mgenglish.pembrokeshire.gov.uk/documents/s46612/02.07.2018%20-%20Use%20of%20Affordable%20Housing%20-%20Section%20106%20Contributions.pdf?LLL=0>  
July 2<sup>nd</sup> Cabinet Meeting Pembrokeshire County Council

<sup>25</sup> See [Local Development Plan 2](#) webpage.




	W	And as a percentage of total development permitted.	No target specified in the Plan.	See commentary below.
<p><b>Trigger:</b> Failure to achieve 33% of the first target by the formal Plan review period.</p> <p><b>Reason:</b> To allow land an opportunity to come forward means an assessment at this stage would be in appropriate.</p>				
<p><b>Analysis:</b> Allocations in the Plan are for:</p> <ul style="list-style-type: none"> <li>- Allocations with Housing (Table 1 Appendix 2 to this report)</li> <li>- Employment/Mixed Uses (includes live/work) (Table 2 of Appendix 2 this report)</li> <li>- Community Facilities (Table 3 of Appendix 2 of this report)</li> <li>- Road &amp; Cycle Schemes (Table 4 of Appendix 2 this report)</li> </ul> <p><b>Allocations with Housing (Table 1 Appendix 2):</b> The target was to have 33% of the land allocations with permission by the end of the financial year 2014/15. The target was not achieved. At the end of the financial year 2016-17 25% of the land allocated by area had been granted planning permission, accounting for 26% of the units allocated. The target has not been achieved. In the 2017/18 monitoring period 34% (11 of 32) of the allocated sites had been granted planning permission and they supplied 27% of the overall number of dwellings allocated in the Plan.</p> <p>The Authority's Review Report for the Local Development Plan identifies the changes needed and these have been included in <a href="#">the replacement Local Development Deposit Plan</a>.</p> <p>There is no target specified for the amount of residential units permitted on allocated sites as a percentage of all residential permitted since Plan adoption.</p> <p>The number of dwellings permitted on non-allocated sites shows that in line with actions identified under Indicator 20 to improve land availability allocated sites provide for 51% of the units permitted and non-allocated sites for 49%.</p>				
<p><b>Employment/Mixed Uses – excludes mixed use listed in Table 1 Appendix 2 (Table 2):</b> The target was to have 33% of the land allocations with permission by the end of the financial year 2014/15. 3 sites are allocated and they are not progressing. Reasons include lack of interest by the landowner, lack of developer interest and issues around the viability of bringing employment sites forward where there is a lack of public funding.</p> <p>773 applications were approved for employment related uses in the Plan period (as at end of April 2017) and these were not on allocated sites.</p> <p>The Authority's Review Report for the Local Development Plan identifies the changes needed and a new approach is set out in the <a href="#">replacement Local Development Deposit Plan</a>. No allocations are made. Criteria based policies are included.</p>				

**Community Facilities (Table 3 Appendix 2):** The target was to have 33% of the land allocations with permission by the review period (end of the financial year 2014/15). Two allocations were made in the Plan for community facility provision. The target of 33% has not been met as none of the allocations have been fully implemented. The future of allocations have been 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. No allocations are made in the Deposit replacement plan. A criteria based policy supportive of provision is retained.

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


**Conclusion:** Please see Indicators 20 and 21 for recommendations regarding housing. A revision of the employment/mixed use allocations shown in Table 1 and 2 Appendix 2 has been undertaken as part of the work replacing the Local Development Plan. No allocations are made. Criteria based policies are included. The allocations for community facilities are being revisited as part of the Local Development Plan revision. No allocations are provided. A criteria based policy is retained.<sup>26</sup> The Authority has discussed the need for revisions required to the list of schemes listed in Table 4 Road & Cycle Schemes Appendix 2 with the County Council as highway authority and none are needed to be safeguarded in the replacement Local Development Plan.

Policy Area		Indicator 23	Target	Performance
Policy 44	W	Average density of housing development permitted on allocated development plan sites.	30 per hectare target in the Plan Centres achieved.	
<b>Trigger:</b> 2 or more housing developments not achieving 30 dwellings to the hectare. <b>Reason:</b> To make the best use of available land.				
<b>Analysis:</b> One application for development of an allocated site was granted during this monitoring period. The application sought to increase the number of units previously permitted on the site from 10 to 18. This brings the density of the site to slightly under 30 per hectare but it is over 200% increase on the number of units for				

<sup>26</sup> See [Local Development Plan 2](#) webpage.

the site than that detailed in the Local Development Plan.

**Conclusion:** The target continues to be met.

Policy Area	Indicator 24	Target	Performance
Policy 44 to 47	Effectiveness of Policies (Policy 44 to 47) & Supplementary Planning Guidance (Affordable Housing, Low Impact Development making a Positive Contribution) when dealing with Applications and at Appeals	Inspector does not raise issues regarding the effectiveness of the policies or supporting supplementary planning guidance.	
<p><b>Analysis:</b> In the period April 2017 to March 2018 two appeal decisions cited Policy 45 Affordable Housing and the Affordable Housing supplementary Planning Guidance.</p> <p>One appeal was allowed, which considered whether a housing plot represented a rounding off opportunity, which the Inspector considered in this case that it did and caused no landscape harm, therefore differing to the Authority's judgement and not directly related to affordable housing provision.</p> <p>The other appeal was dismissed partly on the grounds of failing to comply with Policy 45 and the Affordable Housing Supplementary Planning Guidance, in addition to landscape and accessibility concerns.</p> <p><b>Conclusion:</b> No appeal decisions dispute the appropriateness of the policies for consideration in these decisions, nor their effectiveness. There is no evidence to suggest the policies and guidance in this grouping are not performing at appeals.</p>			

## 2F Community Facilities, Retailing and Transport

### Key outcomes

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


### Context

2.17 **Retailing:** A report from the Local Data Company, based on a study of the top 500 Welsh town and city centres, states that the Welsh shopping centre vacancy rate in 2017 was 13%, which is a reduction of 1.1% since 2013. Out of all the centres, Milford Haven continued to have the highest vacancy rate in the study. The latest study of National Park centres gives an average of 4.9% vacant units, this is a slight increase from 4.3% in 2017. The highest unit vacancy rate is currently in Tenby at 8.5%, an increase of 2.7% since 2017 which is also the largest change among the centres surveyed. Some explanation for this would be the addition of newly constructed larger units, which have yet to be occupied. This recent increase in vacancy rates will however continue to be monitored.

2.18 To inform Local Development Plan revision, the Authority, in partnership with Pembrokeshire and Ceredigion County Councils commissioned a study titled 'South West Wales Regional Retail Study', which was published in February 2017. The study reports on the existing levels of provision and patterns of convenience, comparison and bulky goods shopping in the region, identifies any likely additional future capacity requirements for each retail centre, and advises on the potential and effectiveness of a regional strategy and hierarchy for the three authority local planning areas. The study forms part of the Local Development Plan review evidence base. The [Deposit Local Development Plan 2](#) refers to the findings of this study and presents a retail strategy and criteria based policy which is considered to be appropriate.

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


### Policy Performance

Policy Area	Indicator 25	Target	Performance
Policy 48	Number of approvals for loss of community facilities	0 unless justified by policy framework	
<p><b>Trigger:</b> 1 or more community facilities lost contrary to recommendation.  <b>Reason:</b> Community facilities are important to community sustainability.</p>			

**Analysis:** No applications determined between 1<sup>st</sup> April 2017 and 31<sup>th</sup> March 2018 linked to Policy 48 resulted in a community facility being lost contrary to recommendation.

Commentary is provided on sites allocated for community facilities in Appendix 2.

**Conclusion:** No need to review.


Policy Area		Indicator 26	Target	Performance
Policy 48		Number of Planning Obligations for community facilities secured from development (or financial contributions).	S106 agreements secured in line with Supplementary Planning Guidance	

**Trigger:** More than 2 applications decided contrary to the recommendation.

**Reason:** To secure improvement in community facility provision.

**Analysis:** There have been no applications decided contrary to recommendation during the monitoring period. (2017 to 2018)

**Conclusion:** There are no issues arising as the trigger has not been met.

Policy Area		Indicator 27	Target	Performance
Policy16	W	Amount of greenfield and open space lost to development (ha) which is not allocated in the Plan.	Greenfield - 0 % except for exceptional land released for affordable housing or community facility provision.  Open Space lost - 0 % except where, with playing fields, facilities can be best retained and enhanced through the redevelopment of a small part of the site or alternative provision can be made of equivalent benefit or there is excess provision in the area.	

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

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

**Analysis:** Twenty-one planning applications were approved which included the

development of greenfield land during the monitoring period. This amounted to the development of 4.45ha of greenfield land.

Of the 21 applications:

- 2 were for camping/caravan development granted Certificates of Lawfulness;
- 1 was for rural enterprise worker's dwelling which met with national policy justification;
- 3 were for agricultural buildings;
- 3 were for stables and associated development;
- 1 was a car park extension for an existing attraction in the countryside;
- 3 were bases for mast structures and ancillary equipment;
- 1 was for a disabled path and viewing area linked to a proposal previously granted planning permission (but not yet developed);
- 1 was for an infill plot for 2 dwellings, meeting the policy definition;
- 2 were the inclusion of land within domestic curtilage; and
- 1 was for a troop shelter at the Ministry of Defence Range.

**Conclusion:** All of the applications for development of greenfield sites met with the policies of the Local Development Plan and/or national planning policy.


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

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

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

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

**Conclusion:** See Indicator 27.


Policy Area		Indicator 29	Target	Performance
Retail Policy 48		Percentage of vacant retail floor space.	No greater than 10%.	

**Trigger:** Greater than 10% vacant A use class floor space within retail centres for 2 consecutive years.

**Reason:** Vacancy in centres naturally fluctuates and allows for new ventures to come forward. Sustained relatively high vacancy for National Park centres should be assessed further.

**Analysis:** Across the centres of Tenby, Saundersfoot, St Davids, Solva and Newport, and for all A use class units, the average vacant floor space is 5.6% at 2018. A breakdown of vacant floor space percentage by centre is as follows, Newport 3.4%, Saundersfoot 1%, St Davids 3.5%, Solva 0% and Tenby 8.5%.

**Conclusion:** No issues arise regarding vacancy rates in the National Park's retail centres. Slight increases in vacant floorspace since 2017 have occurred in Tenby (by 2.7%) and St Davids (by 2%), Saundersfoot has decreased slightly (by 2.2%), so has Newport (by 0.3%) and Solva (by 7.9%). Overall the vacancy percentage has increased from 4.5% to 5.6% since last year. For unit numbers, the average vacancy rate for the National Park is 4.9% (an increase of 0.6% from 2017): this is significantly below the national average for town centres at 13% (see paragraph 2.14 above).


Policy Area	Indicator 30	Target	Performance
Transport Policy 52	Approvals for development without providing appropriate access for vehicles, cyclists and pedestrians.	0	

**Trigger:** 1 or more developments approved contrary to Policy 52 recommendation in any one year.

**Reason:** These are essential for developments to go ahead.

**Analysis:** There have been no developments given planning permission without providing appropriate access for vehicles, cyclists and pedestrians (2017-2018).

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

Policy Area	Indicator 31	Target	Performance
Policy 52	Approvals for development causing significant concerns regarding potential transport impacts.	0	

**Trigger:** 1 or more applications approved causing significant traffic impact concerns.


**Reason:** Significant concerns will impact on communities and will require assessment.

**Analysis:** There were no applications raising significant traffic impact concerns approved

during the 2017/18 monitoring period.

**Conclusion:** There are no issues arising as the target has been met.

Policy Area	Indicator 32	Target	Performance
Waste	Amount of waste management capacity permitted expressed as a percentage of total capacity required, as identified in the Regional Waste Plan.	1.5 hectares or 100% (if not provided for outside the National Park in conjunction with Pembrokeshire County Council's provision.	N/A
<p><b>Trigger:</b> Application/s approved for 50% provision (0.75 hectare) by first formal review – 2014.</p> <p><b>Reason:</b> Significant concerns will impact on communities and will require assessment.</p> <p><b>Analysis:</b> A two hectare Civic Amenity Site has been developed and is now operational outside of the National Park on Devonshire Drive, Crane Cross. This site has replaced the former Salterns Civic Amenity Site in Tenby (see Chapter 2B of the 2015 Annual Monitoring Report).</p> <p><b>Conclusion:</b> Due to the changes in national policy, there is no longer a need to monitor the provision of waste management capacity based on land take (see paragraphs 2.13 – 2.19 of the 2014 Annual Monitoring Report). Updates are required to Local Development Plan Policies 27 'Local Waste Management Facilities' and 28 'Composting' to reflect the new national policy context. A new indicator to monitor the performance of these updated policies has been included in the Deposit Local Development Plan 2 .<sup>27</sup></p>			

Policy Area	Indicator 33	Target	Performance
Policy 48 to 56	Effectiveness of Policies (Policy 48 to 56) & Supplementary Planning Guidance (Planning Obligations) when dealing with Appeals	No issues arise from any appeal decisions regarding the effectiveness of the Plan's policies.	
<p><b>Analysis:</b> In the period April 2017 to March 2018 three appeal decisions cited policies in</p>			

<sup>27</sup> See [Local Development Plan 2](#) webpage.



this group, none cited relevant supplementary planning guidance.

One decision cited Policy 50 Town and District Shopping Centres and Policy 53 Impacts of Traffic. It considered the impact of a change of use from A1 to A3 use within the designated Town Centre of Tenby, where the Inspector differed from the Authority in her judgement on the impact upon existing amenity levels and the suitability of parking arrangements and allowed the appeal.

One appeal was against an Enforcement Notice on a car park constructed without planning permission, this was partly allowed for an extension of time to comply with the notice, but was upheld on other grounds citing Policies 52 Sustainable Transport and Policy 53 Impacts of Traffic.

One decision considered an application for two residential units as infill in a countryside location and was dismissed partly on accessibility grounds, citing Policy 52 Sustainable Transport.

**Conclusion:** No appeal decisions dispute the appropriateness of the policies for consideration in these decisions, nor their effectiveness. There is no evidence to suggest the policies and guidance in this grouping are not performing at appeals.

### 3. Sustainability Appraisal Monitoring

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

Objective Number	Sustainability Objective
1	<p><b>Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well-being.</b></p> <p>Figures from Stats Wales for “Work place employment by Welsh Local Authority areas and broad industry” show a trend of decline in employment rates in agriculture, forestry and fishing in Pembrokeshire between 2010 and 2015. However, between 2015 and 2016 there has been a sharp increase of 1000 persons employed in these sectors.</p> <p>The 2016 State of Wildlife in Pembrokeshire report provides an update on the 2011 report and an assessment on the progress in the 5 years between the reports. The report suggests that biodiversity associated with agriculture such as farmland birds, heathland and arable field margins are in decline. However, the report also highlights that those habitats and species where considerable effort has been made are stable or are improving. It is also noted that oak woodlands are improving, which may be due to improved forestry practices.</p> <p>Within the National Park specifically the condition of biodiversity features on agricultural land may be more favourable due to many long term management agreements with farmers/ landowners as well as the significant land holdings of the National Trust and Ministry of Defence adding value.</p>
2	<p><b>Locate developments so as to minimise the demand for travel, especially by private car.</b></p> <p>Progress towards this objective within the context of the Local Development Plan will be the result of maintaining or improving community facilities, and restricting residential development in remote areas or areas with poor community infrastructure. During this monitoring period no proposals were approved contrary to Policy 7 of the Local Development Plan.</p> <p>Achievement of this sustainability objective will depend largely on activity outside the Local Development Plan. Commentary for sustainability appraisal objective 13 also indicates that generally, within the scope of the Local Development Plan, community facilities are being retained and enhanced.</p> <p>Please also see the commentary for sustainability objective 4 and policy 52 (indicator 31).</p>
3	<p><b>Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology) with reference to the special qualities of the National</b></p>

Objective Number	Sustainability Objective
	<p><b>Park.</b></p> <p>Tranquillity mapping carried out by the Countryside Council for Wales in 1997 and 2009 suggests that the National Park is becoming a more disturbed place, largely due to increased impact of road traffic. An update to this data is planned for 2018/19.</p> <p>The adoption of the Landscape Character Assessment Study (July 2011) and Conservation Areas (October 2011) Supplementary Planning Guidance has helped to identify suitable enhancements as well as developments that would be out of character with the landscape or townscape of the National Park.</p> <p>In 2013 the Authority adopted new Supplementary Planning Guidance on Seascapes, which provides more detailed guidance on how Policies 8 (Special Qualities) and 15 (Conservation of Pembrokeshire Coast National Park) are applied. This guidance helps to address seaward development impacts by dividing the National Park into 12 character areas and identifying their sensitivities.</p> <p>In December 2013 Supplementary Planning Guidance on the Cumulative Impact of Wind Turbines was adopted, which aims to address the issue of multiple wind turbine proposals and associated landscape impacts. This should help to reduce the landscape impacts of wind turbine developments. However, no applications for wind turbines were received during this monitoring period.</p> <p>Partnership work with Pembrokeshire County Council and Carmarthenshire County Council has continued during this monitoring period to record renewable energy developments. This work has now resulted in comprehensive GIS data sets detailing the scale and location of wind turbine and large scale ground mounted photovoltaic developments. These datasets are available to the public for review and to Officers and applicants to assist in assessing the cumulative landscape impacts.</p> <p>As part of the background work to the first review of the Local Development Plan a Caravan and Chalet Landscape Capacity Study was carried out by White Consultants in 2015. This commission explored the potential for further caravan and camping development within the National Park.</p> <p>The Authority put forward 6 sites throughout the National Park as candidates for “Dark Sky Discovery Sites”, 4 of these were accepted. A further 3 sites were proposed by the National Trust; all of these were also accepted.</p> <p>Long term concerns about changes in landscape quality are part of the rationale of this objective. Application of the Local Development Plan policies and projects outside the planning process suggest positive progress towards this objective.</p>
4	<p><b>Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.</b></p> <p>The role of the Local Development Plan in meeting this objective is</p>

Objective Number	Sustainability Objective
	<p>likely to be restricted to its role in determining applications proposing development to support such activity, and securing planning obligations to develop cycle ways or footpaths. Policy 52 requires new development to include appropriate access for walkers and cyclists.</p> <p>No developments have received planning approval without providing appropriate access for cyclists and pedestrians during this monitoring period indicating that the Local Development Plan is contributing positively to this sustainability appraisal objective.</p>
5	<p><b>Increase the number of visitors using the National Park outside the peak visitor season.</b></p> <p>Progress in this sustainability appraisal objective is largely dependent on activities beyond the influence of the Local Development Plan i.e. an increase in visitor numbers out of season is more likely to come about as a result of the marketing strategies employed by the tourism sector or changes to the school holidays. However, the Local Development Plan may assist by supporting improvements which create accommodation suited to year round use, whilst not adding substantively to the overall provision.</p> <p>Approvals for self-catering accommodation since adoption of the Plan may help meet the aim to improve the suitability of accommodation for year round use, though they also increase the overall provision.</p> <p>Therefore the planning contribution to this sustainability objective can be seen as mixed. During this monitoring period 26 units for self-catering were permitted. This is consistent with the objective of not adding substantively to overall provision.</p> <p>A review of the Authority's approach to camping, caravanning and chalet policies referred to in Chapter 2D forms part of the <a href="#">Local Development Plan revision</a>.</p>
6	<p><b>Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.</b></p> <p>The Local Development Plan will contribute towards this objective primarily by not adding to the amount of infrastructure at risk from fluvial/coastal flooding. One planning permission to intensify residential use in areas predicted to be affected by sea level rise of up to two metres was granted during this monitoring period. See indicator 13 for more information. The permission was granted contrary to officer recommendation. The issue of restricting development and the potential need for relocation of properties from the risk associated with sea-level rise is being considered through <a href="#">the Local Development Plan 1 revision</a> process with a suite of new policies introduced.</p>
7	<p><b>Reduce factors contributing to climate change.</b></p> <p>Emissions of greenhouse gases resulting from activities within the National Park that could be influenced by the Local Development Plan are centred on domestic, commercial and road transport.</p> <p>Local authority estimates by the Department for Energy and Climate Change for Pembrokeshire (2005 – 2015) (released 29/06/2016) indicate that the per capita rates of carbon dioxide from domestic</p>

Objective Number	Sustainability Objective
	<p>sources have remained consistent between 2005 and 2015.</p> <p>Carbon dioxide from industrial and commercial sources has decreased by approximately 20% between 2013 and 2014, having remained fairly consistent between 2005 and 2013. Emissions from this source have decreased a further 7% between 2014 and 2015.</p> <p>At present the Local Development Plan is exceeding its target for electricity generation from renewable sources brought forward by planning proposals, with an increase of 0.57 Gwh over the last monitoring period. This increase can be attributed mainly to small scale solar photovoltaics, along with an approval for a single stand alone 4Kw domestic array (see indicator 12a).</p> <p>The Local Development Plan is still falling short of its target for renewable heat generation. A small increase from 4.235 to Gwh to 4.239 Gwh was recorded during this monitoring period. The reasons that the Plan is falling short of this target are outlined under indicator 12b.</p> <p>Please also see the commentary in Chapter 2C as the overall targets are being revised to take account of an extended Local Development Plan period in <a href="#">the replacement Local Development Plan</a>.</p>
8	<p><b>Maximise the contribution of the limited opportunities for development to sustaining local communities.</b></p> <p>Provision of affordable housing within the National Park has fallen short of the target set out in the Local Development Plan (See the analysis and conclusions under indicator 21 for details).</p> <p>As an interim measure the National Park Authority has commissioned and completed updated Affordable Housing Supplementary Planning Guidance that aims to streamline the planning process for affordable housing. The guidance has also re-examined the expectation of provision geographically and reduced it accordingly to better take into account recent economic conditions. These measures should help to improve affordable housing provision while the policy is being examined in detail when preparing the replacement Local Development Plan.</p> <p>Indicators 20, 21 and 22 provide a detailed commentary on progress with the various allocations in the Local Development Plan and where areas require revision. Permissions granted that are not on allocated sites can in general be regarded as positively contributing to sustaining local communities.</p> <p>In conclusion the Local Development Plan is contributing positively to the local economy throughout the Park by providing a positive policy framework for the approval of schemes. Poor performance on delivery on allocated sites <a href="#">is being addressed through Local Development Plan revision</a>.</p>
9	<p><b>Encourage access for all to the National Park, reflecting the social mix of society.</b></p> <p>Meeting this objective is likely to be the result of efforts outside the application of the Local Development Plan. Policy 39 may lead to the</p>

Objective Number	Sustainability Objective
	<p>conversion of cheaper forms of accommodation to more expensive forms, which would not help in meeting this objective. During the monitoring period 2 applications for upgrades to caravan and camping sites were approved.</p> <p>Policy 45 encourages the delivery of affordable housing. Indicators 20 to 22 provide a commentary on progress made and the Local Development Plan Review Report identifies the changes needed alongside the replacement Local Development Plan Preferred Strategy.</p>
10	<p><b>Maintain the cultural distinctiveness of communities.</b></p> <p><b>This sustainability objective covers the breadth of aspects that contribute to the unique character and cultural distinctiveness of the National Park.</b></p> <p>Within the context of the Local Development Plan, achievements towards this objective will be threefold. Firstly the Local Development Plan will be able to contribute towards the objective by helping to ensure that people who grew up in the National Park are able to have the opportunity to continue living here once they are adults by sustaining local communities and enabling access to employment (see comments under Sustainability Appraisal Objective 8). Secondly, the Local Development Plan will be able to contribute to the objective by helping to maintain and enhance culturally significant built environment and natural environment features. In terms of maintaining listed buildings, less than 10% (5.5%) are identified as being at any degree of risk. There is potential for the uses of listed buildings to change – 2 listed building consents for change of use were granted between April 1st 2017 and March 31st 2018. Thirdly Policy 12 Welsh Language can be engaged when issues that prejudice the interests of the Welsh language arise. No issues have arisen during the monitoring period.</p>
11	<p><b>The adverse effects of minerals exploitation in the National Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.</b></p> <p>No new quarries or extensions to existing quarries have been approved during the monitoring period.</p> <p>A Periodic Review application to review planning conditions for Carew Quarry was made to the Authority in December 2012 and is still on-going. The Authority is currently undertaking a Habitats Regulations Assessment due to the hydrogeological interrelationship between the quarry and Carew mill pond.</p> <p>The making of a Prohibition Order to prevent the resumption of mineral working at Penberry Quarry, with restoration conditions requiring demolition of the existing buildings on site, was approved by the Development Management Committee in January 2014. The Order has been publicised and submitted to the Welsh Government for confirmation.</p> <p>The Authority has conducted a periodic review of Syke Quarry's mineral planning conditions (ROMP), which occurs every 15 years for 'mining sites', to update conditions to modern standards.</p>

Objective Number	Sustainability Objective
12	<p><b>Reduce the negative impacts of waste.</b></p> <p>The percentage of municipal waste collected for reuse, recycling or composting across Pembrokeshire was 65.3% in 2016/17, a small increase on 2015/16 (64.9%), this increase is attributed to the amount of non-household waste recycled.</p> <p>The number of fly-tipping incidences reported has increased in Pembrokeshire between 2015/16 (1,199) and 2016/17 (1,521). Past figures show similar peaks and troughs year on year but with smaller variation. The 2016/17 figure is the highest in the last 10 years of figures.</p>
13	<p><b>Community facilities (including health &amp; social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population.</b></p> <p>The provision and retention of community facilities is affected, largely, by factors beyond the scope of the Local Development Plan. However the Local Development Plan can help to retain community facilities through the application of Policy 48. It can also contribute through granting planning applications for the construction of new facilities or the improvement of existing facilities.</p> <p>During the 2017 – 2018 monitoring period no applications were approved that would result in the loss of a community facility (Policy 48), and five applications were approved for the improvement of existing community facilities.</p>
14	<p><b>Maintain and enhance biodiversity both within and outside designated sites</b></p> <p>The “State of Wildlife in Pembrokeshire” (2016) suggests that biodiversity associated with agriculture is in decline, and has declined further between the 2011 and 2016 reports (see comments under Objective 1).</p> <p>During the 2017-18 monitoring period the Authority carried out conservation land management activities on over 100 sites across the National Park, with one or two sites outside of the National Park where opportunities to improve connectivity arise. Results from this conservation monitoring period indicate that all of the sites under active conservation management are improving or are in excellent condition. Many of these sites help to maintain and enhance the biodiversity of designated sites by providing buffering and improving connectivity. This strategic approach has wide spread benefits for biodiversity both within and outside of the National Park.</p> <p>In addition there are specific projects carried out such as the Stitch in Time project, which is a strategic approach to the control of invasive non-native species in the Gwaun Valley.</p> <p>Within the scope of the Local Development Plan effects to biodiversity occur as the result of the loss of connectivity between habitats e.g. loss of hedgerows, or through the outright loss of habitats due to development pressure. All planning applications are tested for</p>

Objective Number	Sustainability Objective
	<p>accordance with Local Development Plan Policy 11 'Protection of Biodiversity'. Between April 1st 2017 and March 31st 2018 no developments have received planning approval contrary to this policy. Additionally, during the monitoring period, 57 planning applications have been approved that included measures to promote biodiversity gain.</p> <p>It is considered that the Local Development Plan is making positive contributions to this sustainability objective.</p>
15	<p><b>Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.</b></p> <p>Dŵr Cymru/Welsh Water (January 2015) has indicated that in general, they should be able to provide water to any new housing coming forward under the Local Development Plan. However, there are known issues for sewerage and waste water treatment capacity in many of the settlements within or partly within the National Park.</p> <p>During this monitoring period 12 beaches in the National Park were awarded blue flags, with a further 14 being awarded green coast awards (covering more remote, rural beaches).</p> <p>The most recent Water Framework Directive data (2015) for overall classification indicates that 50% of the coastal waters in Pembrokeshire are achieving "Good" classification<sup>28</sup>; the remaining 50% are achieving "Moderate". Estuaries are of 60% and 40% "Moderate" and good overall status respectively. These two types of water body are, proportionately, more within the National Park than in the rest of the County.</p> <p>2015 Water Framework Directive data, which includes the assessment, for rivers is available to download from Natural Resources Wales in GIS format (ESRI Geodatabase<sup>29</sup>), this allows for more specific figures to be derived for the National Park. This data indicates that 59% of the river waters in the National Park are achieving "Good" classification, 34% "Moderate" classification and 7% "Poor".</p>

<sup>28</sup> The Water Framework Directive classification is risk-based and focuses where there is likely to be a problem. It uses a principle of 'one out, all out' which means that the poorest individual result drives the overall classification. It reports on over 30 measures, grouped into ecological status and chemical status. The overall classification status for surface waters is assessed by combining the ecological status with the chemical status. If the chemical status of the water body is Good, or the water body does not require chemical assessment, then the overall status is the same as the ecological status. If the chemical status is Failing to Achieve Good then the water body cannot achieve Good or High overall status. The overall status of a water body that has ecological status Good or High but is failing to achieve Good chemical status is Moderate. Otherwise, the overall status is the same as the ecological status (Natural Resources Wales 2016).

<sup>29</sup> Natural Resources Wales Water Framework Directive (WFD) River Waterbodies Cycle 2 Data available from <http://bit.ly/2stLPoZ>





Appendix 1 Supplementary Planning Guidance (as at July 2018)

	Title	Current Status
1.	Accessibility	Adopted June 2013
2.	Affordable Housing (Replacement Guidance)	Adopted November 2014.
3.	Archaeology	Adopted June 2011
4.	Coal Works – Instability	Adopted June 2011- Technical update May 2014
5.	Conservation Area Proposals <sup>30</sup>	October 2011
6.	Landscape	Adopted June 2011
7.	Loss of Hotels	Adopted June 2011
8.	Low Impact Development	Adopted June 2013
9.	Parking	Adopted June 2011
10.	Planning Obligations (Replacement Guidance)	Adopted September 2016
11.	Recreation	Adopted December 2012
12.	Regionally Important Geodiversity Sites	Adopted October 2011 Addendum adopted 28 <sup>th</sup> September 2016
13.	Renewable Energy Addendum to the Renewable Energy on Field Arrays <sup>31</sup>	Adopted October 2011 Adopted June 2012 Technical update April 2014
14.	Safeguarding Mineral Zones	Adopted June 2011 Technical update June 2014
15.	Seascape Character	Adopted December 2013
16.	Shopfront Design	Adopted October 2011
17.	Siting and Design of Farm Buildings	Adopted June 2012
18.	Sustainable Design	Adopted June 2011 (updated December 2013)

<sup>30</sup> Angle, Caerfarchell, Caldey Island, Little Haven, Manorbier, Newport and Newport Parrog, Portclew, Porthgain, Saundersfoot, Solva, St Davids Trefin, Tenby.

<sup>31</sup> Now incorporated in the Renewable Energy Supplementary Planning Guidance

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

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

## Appendix 2 Site Specific Monitoring

### Key to Table 1

Planning permission granted as at April 2018 <sup>32</sup> or site completed	
Landowner or developer actively investigating bringing the site forward for development under the Local Development Plan adopted September 2010.	
Allocation not progressing, e.g.: <ul style="list-style-type: none"> <li>- Lack of interest by the land owner</li> <li>- Awaiting improvements to the housing market</li> <li>- Significant infrastructure constraint</li> </ul>	
Being assessed as a Candidate Site/New or Amended Site for the replacement Local Development Plan (Deposit).	CS (ref) New/Amended Site (ref) HA Deposit Plan 2 Allocation (ref) See website for further details <sup>33</sup>

Table 1 Allocations that include housing

Location Proposals Map ID	Site Name and Location	
Broad Haven HA734	South of Driftwood Close	CS 006 HA8 in LDP2
Broad Haven MA776	Land north east of Marine Road	CS 041 HA9 in LDP2
Crymych HA750	Depot Site	Site completed
Dale HA382	Castle Way	CS 087
Dinas Cross HA387	Opposite Bay View Terrace	CS 137
Herbrandston HA732	East of Herbrandston Hall	CS 149
Jameston HA436	North of Landway Farm	Site completed
Jameston HA730	Opposite Bush Terrace	CS 022 HA10 in LDP2
Jameston HA821	Green Grove	CS 033 in LDP2
Lawrenny HA559	Adj Home Farm	CS 045
Manorbier Station HA848	Field opp Manorbier VC	CS 029

<sup>32</sup> Includes having a resolution to grant planning permission for housing subject to the signing of a S106 agreement.

<sup>33</sup> [Pembrokeshire Coast National Park - Deposit Plan 2](#) (Replacement Plan)

Location Proposals Map ID	Site Name and Location		
	School	HA12 in LDP2	
Manorbier Station MA895	Land part of Buttylands	CS 138	
New Hedges HA813	Rear of Cross Park	CS 145	
Newport HA825	North of Feidr Eglwys	CS 141 HA1 in LDP2	
Saundersfoot MA777	Rear of Cambrian Hotel, Saundersfoot	Part completed	
Solva HA384	Adj Bro Dawel	CS111	
Solva HA792	Bank House, Whitchurch Lane	CS102	
St Davids HA385	North of Twr-y-Felin	Completed	
St Davids HA737	West of Glasfryn Rd	CS 099 HA7 in LDP2	
St Davids HA789	Adj Ysgol Bro Dewi, Nun Street	CS 097	
St Ishmaels MA733	Adj School	CS 055 (part) HA15 in LDP2	CS 034/055
Tenby HA377	Brynhir	CS 112	
Tenby HA723	Former Cottage Hospital Site		
Tenby HA724	Rectory Car Park	CS 146	
Tenby HA727	West of Narberth Road	CS 056	
Tenby HA752	Butts Field Car park, Tenby	CS 113	
Tenby HA760	Reservoir Site, Tenby	CS 147	
Tenby MA706	Upper Park Road, Tenby	completed	
Tenby MA707	White Lion St/Deer Park, Tenby	completed	
Tenby MA710	Sergeants Lane, Tenby	CS 148	
Trefin HA738	North of Heol Crwys	CS 150	

#### Key to Tables 2, 3 and 4

Planning permission granted/site completed	
Landowner or developer actively investigating bringing the site forward for development under the Local Development Plan adopted September 2010.	
Allocation not progressing	
Being assessed as a Candidate Site/New or Amended Site for the replacement Local Development Plan.	CS (ref)  New/Amended Site (ref)

	See website for further details <sup>34</sup>
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Table 2 Allocations of Employment/Mixed Use Sites (not included in Table 1)

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. CS 060/ 082/ 083
EA748	South of St Davids Assemblies	Employment B1, B8, Local Waste Management Facility	Not implemented. Landowner has advised that this site will not be developed. This will be addressed through the replacement Local Development Plan. CS 003
MA746	Between Glasfryn Road and Millard Park, St Davids	Mixed (Live/Work Units)	Not implemented. CS 004

Table 3 Community Facilities

Site Ref	Site Name & Location	Use	Monitoring
CP829	Land at Saundersfoot Railway Station, Pentlepoir	Car Park	The landowner has submitted the land as a Candidate Site for a mixed use proposal – ref CS 025 for Local Development Plan 2.

<sup>34</sup> [Pembrokeshire Coast National Park - Deposit Plan](#)

Site Ref	Site Name & Location	Use	Monitoring
CP828	Manorbier Station	Car Park	<p>Application NP/13/82 granted for 5 parking spaces; 1 disabled space, cycle parking and directional signs. This was incorrectly reported in the 2015 Annual Monitoring Report as having been implemented. Work commenced but higher than expected cost estimates to fulfil Network Rail requirements and insufficient grant funding resulted in Pembrokeshire County Council being unable to progress the works further.</p> <p>This allocation has not been included in Local Development Plan 2.</p>

Table 4 Road & Cycle Schemes

Scheme Number	Road/Cycle Schemes	Monitoring
RI1	New House Bridge Improvement A4075	<p>The shared use path along the A4075 between the Bluestone Resort and Eagle Lodge, Canaston Woods and the nearby car park have been completed. These were funded from Welsh Government's Local Transport Fund. The highway scheme is now proposed as a minor</p>

		realignment. This scheme is not included in the Deposit Local Development Plan 2.
RI2	Shared Use Path south of Carew Castle	Completed.
RI3	St Petrox Bends Improvement	A scaled back and localised version of the original aspiration is now being considered by Pembrokeshire County Council. This scheme is not included in the Deposit Local Development Plan 2.
RI4	Fan Road/B4316 Junction Improvement, Saundersfoot	Not implemented. Pembrokeshire County Council has advised the scheme should be removed from the Plan. It is currently on the Minor Works Request list but there is no commitment to develop the scheme. Scheme not included in Local Development Plan 2.
RI5	Gumfreston to Tenby Phase 3	Completed.
RI6	Glasfryn Lane, St Davids	Completed.
RI7	A40 Canaston Bridge	Completed.