

Pembrokeshire Coast National Park

National Park Management Plan (2025-2029)

Sustainability Appraisal (incorporating
Strategic Environmental Assessment)

Draft Scoping Report

April 2024

PEMBROKESHIRE COAST
NATIONAL PARK AUTHORITY

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Section 1.0: Introduction

Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)

- 1.1 The requirements of EU Directive 2001/42/EC (also known as the SEA Directive) have been transposed into Welsh Law through The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004. Strategic Environmental Assessment requires the formal assessment of certain plans and programmes that are likely to have significant effects on the environment. The Pembrokeshire Coast National Park Management Plan is such a plan and is therefore subject to SEA.
- 1.2 The duty of National Park Authorities to foster the economic and social well-being of National Park communities in pursuit of their purposes, suggests that it is appropriate to consider wider sustainability objectives in an assessment of the National Park Management Plan. Guidance on National Park Management Plan preparation published by Natural Resources Wales (NRW) advises that the requirements of SEA and SA can be met in a single appraisal.
- 1.3 Sustainability Appraisal is a process that is integral to and informs the Plan making process. The Sustainability Appraisal of the National Park Management Plan, of which this Scoping Report is a part, incorporates a Strategic Environmental Assessment.
- 1.4 Welsh Government defines sustainable development in Wales through the Well-being of Future Generations (Wales) Act 2015 as:
“the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals” (a more comprehensive description of the Act and its goals can be found in Section 5).

Process

- 1.5 The stages to Sustainability Appraisal of plans are as follows:
 - Scoping - setting the context and objectives, establishing the baseline and deciding on the scope;
 - Assessing plan policies against the Sustainability Objectives and producing a Sustainability Appraisal Report ;
 - Producing a Sustainability Statement stating how the findings of the Sustainability Appraisal have been taken into account in the final Plan.
- 1.6 This Scoping Report is concerned with the first stage. It contains: a review of Policies, Plans and Programmes relevant to the Management Plan; baseline

information describing the current conditions in the National Park; it identifies sustainability issues facing the National Park and its residents and establishes a Sustainability Assessment Framework - a set of objectives against which the sustainability of Management Plan policies can be judged.

- 1.7 Public consultation will be undertaken on the draft Environmental Report alongside the consultation on the draft Management Plan. The draft Environmental Report will highlight any likely significant environmental social and economic effects of implementing the Management plan by assessing the policies and actions.

Habitats Regulations Assessment

- 1.8 PCNPA is a competent authority under the Conservation of Habitats and Species Regulations 2017, commonly referred to as the Habitats Regulations. In accordance with Regulation 63 of those regulations, PCNPA must make an assessment of their Management Plan as a matter of law before it is put into effect. This assessment is generally referred to as a 'Habitats Regulations Assessment' or 'HRA' and the regulations set out a clearly defined step-wise process which must be followed.

- 1.9 The Habitats Regulations Assessment for the Management Plan will be presented in a separate document.

Welsh Language

- 1.10 The Authority's Welsh Language Compliance notice requires the Authority to consider how a new policy could be formulated (or how an existing policy could be changed) so that the policy decision would either;
- have a positive effect, or an increased positive effect, or
 - would not have an adverse effect, or would have a decreased adverse effect, on the Welsh language and opportunities for persons to use the Welsh Language.
- 1.11 The policy decision should also ensure that it does not treat the Welsh language less favourably than the English language. The Authority must make a conscientious effort to consider the impacts of policy on Welsh Language.
- 1.12 Authority must make a conscientious effort to consider the impacts of policy on Welsh Language.
- 1.13 A full Welsh Language Impact Assessment (WLIA) for the Management Plan will be presented in a separate.

Equality, Socio Economic, Health and Human Rights Impact Assessment

- 1.13 Under the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011. The Authority must assess how any new or proposed policies and practices may affect protected groups. When assessing the impact on protected groups, the Authority must consider how this will affect its performance of the general duty of the Public Sector Equality Duty.
- 1.14 The Welsh Government has enacted the Socio Economic Duty under the Equality Act 2010. This means the Authority when making decisions of a strategic nature about how to exercise its functions, it must have due regard to the desirability of exercising them in a way that is designed to reduce the inequalities of outcome which result from socio-economic disadvantage.
- 1.15 The Draft Health Impact Assessment (HIA) Regulations (Wales) propose statutory requirement for specific public bodies, including National Park Authorities, in Wales to carry out an HIA when developing or revising strategies that significantly impact health. The primary purpose of HIA is to embed health considerations, including mental health, into decision making processes.
- 1.16 It is unlawful for public bodies in Wales to act incompatibly with the European Convention of Human Rights and must meet their obligations under the Human Rights Act 1998. Public bodies also have obligations to consider, observe and give effect to international human rights treaties signed and ratified by the UK.
- 1.17 The Authority must be able to demonstrate that it has paid due regard to the above areas.
- 1.18 The combined assessment detailed above, for the Management Plan, will be presented in a separate document.

Section 2.0 Relevant Plans, Policies and Programmes

- 2.1 The following Acts, Directives, policies, plans, programmes, reports and reviews have been identified as those that will guide and inform the production of the Management Plan for the Pembrokeshire Coast National Park. It should be noted that this list may evolve as the Plan develops. For a more detailed description of the documents and their relevance to the Plan, as well as web links, refer to Appendix A.

Agenda 21, UN Department of Economic and Social Affairs (1992)
Rio Declaration on Environment and Development, UNEP (1992)
Report of the World Summit on Sustainable Development, United Nations, (2002)
United Nations Framework Convention on Climate Change, United Nations (1994)
The Kyoto Protocol, United Nations (1997)
Convention on Migratory Species, UNEP (1979)
Convention on Biological Diversity, UNEP (1992)
The Ramsar Convention on Wetlands, UNESCO (1971)
Aarhus Convention, United Nations Economic Commission for Europe (1998)
EU Regulation 79/409/EEC (the Wild Birds Directive), The Council of the European Parliament and the Council of the European Union (1979)
EU Regulation 2014/52/EU (the EIA Directive), The European Parliament and the Council of the European Union
EU Regulation 1137/2008' (the Nitrates Directive), European Parliament and the Council of the European Union (2008)
EU Regulation '2013/17/EU' (the Habitats Directive), The Council of the European Union (2013)
EU Regulation 2015/1480 (the New Air Quality Framework Directive), The European Commission (2015)
EU Regulation 2018/850 (the Landfill Directive), European Parliament and the Council of the European Union(2018)
EU Regulation 2014/101/EU (the Water Framework Directive), The European Commission (2014)
EU Regulation 2021/1226 (Directive on Environmental Noise), The European Commission (2021)
EU Regulation 2016/2284 (Directive providing for Public Participation),Parliament and the Council of the European Union (2016)
EU Regulation 2004/35/CE (the Environmental Liability Directive) as amended by Regulation (EU) 2019/1010 The European Parliament and the Council of the European Union 2004 as amended 2019
EU Directive 2008/98/EC (the Waste Management Directive) as amended by the Regulation (EU) 2023/1542 The European Parliament and the Council of the European Union (2023)
European Landscape Convention, Council of Europe (2000)
Convention on the Conservation of European Wildlife and Natural Habitats, Council of Europe,1979
MANAGING NATURA 2000 SITES The provisions of Article 6 of the 'Habitats' Directive 92/43/CEE,European Commission (2000)
European Climate Change Programme,European Commission (2000)
Countryside and Rights of Way Act (as amended), UK Parliament (2000)
Environment Act 1995 (as amended), UK Parliament (1995)
Natural Environment and Rural Communities Act 2006 (as amended),UK Parliament (2006)

Ancient Monuments & Archaeological Areas Act 1979 (as amended), UK Parliament (1979)

Wildlife and Countryside Act 1981 (as amended), UK Parliament (1981)

The Conservation of Habitats and Species Regulations (England and Wales), UK Parliament (2017)

Kunming-Montreal Global Biodiversity Framework, COP15 (2022)

Securing the Future - UK Government sustainable development strategy, UK Government (2005)

The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (as amended), DEFRA (2007)

The Water Framework Directive and Planning – Initial Advice to Planning Authorities in England and Wales, EA; RTPi; WLGA; LGA (2006)

Water for People and the Environment: water resources strategy for England and Wales Environment Agency 2009, Natural Resources Wales (Environment Agency) (2009)

The UK Climate Change Programme, DEFRA (2006)

Marine and Coastal Access Act 2009, UK Government (2009)

Our energy future - creating a low carbon economy, DTI (2003)

Stern Review on the economics of climate change, HM Treasury (2006)

Water and Flood Management Act 2010, UK Parliament (2010)

National transport delivery plan 2022 to 2027, Welsh Government (2023)

Clean Air Plan for Wales: Healthy Air, Welsh Government (2023)

Environmental principles, governance and biodiversity targets: White Paper – Consultation Draft, Welsh Government (2024)

Valued and Resilient: The Welsh Government’s Priorities for the Areas of Outstanding Natural Beauty and National Parks, Welsh Government (2018)

Well-being of Future Generations (Wales) Act 2015, Welsh Government (2015)

Environment (Wales) Act 2016, Welsh Government (2016)

Historic Environment (Wales) Act (as amended), Welsh Government, 2016 as amended 2023

Natural Recovery Plan for Wales, Welsh Government (2015)

Planning Policy Wales 12th edition, Welsh Government (2024)

Technical Advice Notes, Welsh Government, various years

Wales: Prosperity for All – the National Strategy, Welsh Government (2017)

Future Wales: the national plan 2040 Welsh Government (2021)

Welcome to Wales: priorities for the visitor economy 2020 to 2025 Welsh Government (2020)

Sport and physical activity strategy (Climbing higher) Welsh Government (2015)

Environment Strategy for Wales, Welsh Government (2006)

Water Strategy for Wales, Welsh Government (2015)

Llwybr Newydd: the Wales transport strategy 2021, Welsh Government (2021)

National transport delivery plan 2022 to 2027, Welsh Government (2023)

Towards Zero Waste – Waste Strategy for Wales, Welsh Government (2010)

One Wales: One Planet, a new Sustainable Development Scheme for Wales, Welsh Government (2009)

Practice Guidance One Planet Development: Technical Advice Note 6 Planning for Sustainable Rural Communities, Welsh Government (2012)

Replaced with the interim scheme Habitat Wales Scheme 2024-2025, Natural Resources Wales (2023)

Register of Landscapes, Parks and Gardens of Special Historic Interest in Wales, Welsh Government / Natural Resources Wales / CADW

Environment (Wales) Act (2016) Section 7 Terrestrial Habitats of Principal Importance Woodlands for Wales, Welsh Government/ Natural Resources Wales (2018)

Housing Wales Act, Welsh Government (2014)

Rural Development Plan 2014-2020: Next Steps, Welsh Government (2012)

Welsh Language (Wales) Measure 2011 and The Welsh Language Standards Regulations (No.1) 2015, Welsh Government (2011 / 2015)

Western Wales River Basin Management Plan 2015-2021, Natural Resources Wales (2015)

Marine Area Statement, Natural Resources Wales (on-going)

Catchment Abstraction Management Strategies, Natural Resources Wales

Revised Draft Water Resources Management Plan 2024, Dŵr Cymru/Welsh Water (2024)

Wales National Marine Plan, Welsh Government (2019)

South West Wales Area Statement, Natural Resources Wales, (on-going)

Ceredigion Local Development Plan (adopted 2013), Ceredigion County Council (2011)

Ceredigion Replacement Local Development Plan Preferred Strategy: LDP 2 2018-2033, Ceredigion County Council

Carmarthenshire Local Development Plan 2006 - 2021 (adopted), Carmarthenshire County Council (2011)

Carmarthenshire Local Development Plan 2 Deposit Plan: Local Development Plan 2018 - 2033, Carmarthenshire County Council

Pembrokeshire & Carmarthen Bay Shoreline Management Plans, Pembrokeshire County Council

Pembrokeshire Coast National Park Local Development Plan 2 (adopted 2020), Pembrokeshire Coast National Park Authority (2020)

Pembrokeshire County Council Local Development Plan (adopted), Pembrokeshire County Council (2013)

Pembrokeshire County Council Local Development Plan Review (LDP 2) Deposit Plan: Local Development Plan 2 2017-2033, Pembrokeshire County Council (2020)

Well-being Plan for Pembrokeshire, Public Service Board (2023)

Rights of Way Improvement Plan for Pembrokeshire 2018-2028, Pembrokeshire County Council (2018)

Milford Haven Waterway 5 Year Recreation Management Plan, Port of Milford Haven (2021)

Pembrokeshire Nature Recovery Plan (position statement), Pembrokeshire Nature Partnership (2018)

Joint Local Transport Plan for South West Wales 2015 – 2020 (2015)

Cleddau and Pembrokeshire Coastal Rivers Management Catchment summary, Natural Resources Wales (2015)

Teifi and North Ceredigion Management Catchment Summary, Natural Resources Wales (2015)

Nature Recovery Action Plan for Pembrokeshire: Our Strategy for Nature Recovery, Pembrokeshire Nature Partnership (2018)

Celtic Freeport (2023)

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Section 3.0: Baseline Information

- 3.1 The baseline information for the Sustainability Appraisal is quantitative and qualitative information and data describing the social, economic and environmental state of the National Park.
- 3.2 Baseline information serves two purposes, it helps to identify the issues on which the Sustainability Appraisal should focus, and provides a benchmark against which the performance of the Plan (and the accuracy of any predictions) can be assessed. As well as showing the current situation the baseline data shows were possible the situation in the past and projections for the future, in order to indicate trends.
- 3.3 An environmental, economic and social baseline characterisation for the National Park is presented in Appendix B. As the Sustainability Appraisal progresses through the assessment of the plan and monitoring, it will be necessary to refine the baseline data and information set. More quantified and precise data and information, relevant to the sustainability objectives will need to be identified and/or acquired.

Data limitations

- 3.4 Collection of baseline data for Sustainability Appraisal is subject to three difficulties:
- The data for an issue of interest may not be available or not have been collected.
 - Timeliness of data - the only data available for an issue may be out of date. Alternatively current data may be available, but there are no historic datasets to identify trends.
 - The geography at which the data is collected or published - the finest geographical resolution for which data on most issues is published is local authority or ward. Few datasets are published for National Park areas. Even the finest resolution data generally available (data for Census Output Areas) does not cover areas that conform to the National Park boundary. Data geographies also change over time (e.g. the finest resolution of data published for the 1991, 2001, 2011 and 2021 Censuses). Therefore it is often necessary to use interpolation or other estimation techniques to derive data for the National Park area, or use data that describes a wider area.
- 3.5 Furthermore, most of the data used in the baseline has been collected by external bodies, and for purposes that may not be related to sustainability or environmental assessments.

- 3.6 The limitations of the data will have implications for the conclusions that can be drawn from the baseline and monitoring the Plan and Appraisal. These conclusions should therefore also refer to qualitative information and expert judgement and experience.

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Section 4.0: Identification of Sustainability Issues

- 4.1 The following resources were used to identify Sustainability Issues:
- The Policies, Plans and Programmes relevant to the Management Plan;
 - The baseline information gathered;
 - The experience of officers in the National Park Authority of issues faced when working on behalf of the Authority;
- 4.2 The issues identified through the above process are summarised below.

Issue 1: Effects of Climate Change

It is likely that climate change will have significant effects on the National Park, though the nature and scale of those effects is uncertain. The UK Climate Change Projections indicate that, in a moderate scenario, Wales would experience a sea level rise of 0.5m by 2100 with a high scenario of 1m. As a result of this it would be likely that coastal areas of Wales would suffer more frequent and severe flooding, coastal erosion would increase. The risk to infrastructure and communities would increase significantly as well. On top of this the country is expected to experience more frequent and intense rainfall, hotter drier summers.

Issue 2: Impact of recreation and tourism, and associated development

Great importance should be attached to the role of the National Park for tourism and recreational activities. They are beneficial to the local economy, and to the nation in terms of health and well-being. However, in some instance, there can be negative impacts of these activities including traffic congestion, disturbance from activities such as jet skiing, and increased demands on the public service infrastructure. Tourism is sometimes a driver for inappropriate development proposals in the National Park.

Where there are negative impacts of tourism activity, these impacts can be felt by the environment and the resident population, and can diminish the quality of the tourism experience itself. It is also recognised that the tourism industry can also contribute positively to both the environment and resident population.

For the purposes of developing the National Park Management Plan 26 hotspots were identified where there is potential issues related to recreation. Some of the issues identified concern the wider use of a location by the communities that live in them e.g. traffic, and some are conflicts between multiple recreational uses of the same location e.g. diving and angling. The issues were identified through

internal consultation with the Authority's education and engagement team and Rights of Way Team.

Issue 3: Landscape sensitivity to development

The Landscape sensitivity and visibility mapping update to Welsh Government by John Briggs CMLI (Natural Resources Wales) considers that "capacity" is not a property of landscape and that the resilience of landscapes to change should be considered by:

1. assessing the ability of landscapes to accommodate change whilst maintaining the benefits that provide to society.
2. The susceptibility of a landscape to changing when subjected to a defined pressure
3. What values society attaches to the landscape
4. How much change society is willing to accept

Issue 4: Dependence on private cars

Pembrokeshire is a rural area so it is inevitable that a large proportion of journeys need to be made by road in private transport. The National Atmospheric Emissions Inventory data for oxides of Nitrogen and Carbon Monoxide emissions show a strong correlation between emissions and the location of main roads suggesting that road transport causes pollution both locally and globally.

At the 2021 Census 86.2% of households in the National Park had at least one car or van, compared to Wales as a whole where 80.6% of households had a car or van.

The presence of large numbers of cars, whether in car parks or on roads has a negative impact on air quality, landscape, biodiversity, and also the recreational experience. Offering limited alternatives to travel by private car can contribute to social exclusion of residents and visitors.

Issue 5: The physical environment

Air quality in the National Park is generally high though there are pollution hotspots related to road traffic. River quality is generally moderate, though a number of the National Park's rivers, including the Gwaun and Solva, and its coastal waters are classed as at risk or probably at risk (from diffuse and/or point source pollution; physical alteration; and/or alien species) by Natural Resources Wales under the Water Framework Directive.

In January 2021 Natural Resources Wales (NRW) published new targets to reduce the concentration of phosphorus in Special Areas of Conservation across Wales. At present, over 60% of waterbodies in Wales are failing against the tighter targets. In Pembrokeshire, the Afon Teifi and Afonydd Cleddau are designated as riverine SACs and are failing against NRW's targets.

Fly tipping, and roadside and seaborne litter are the most significant waste issues for the National Park.

With regard to soil quality, within the National Park there is a high proportion of the Best and Most Versatile Agricultural Land (BMV). Analysis of the Predictive Agricultural Land Classification (ALC) Map 2 indicates that over 45% (44.59) of the land falls under ALC categories 1 – 3a compared to just 16% (16.2) when considering Wales as a whole.

Issue 6: Reconciling energy development with landscape considerations

The Milford Haven waterway has an established energy industry, with further developments under construction, with a likely increase in planned green energy development following the establishment of the Celtic Freeport in 2023. Though mostly outside the National Park, this development has significant impact on the landscape of the Park due to its scale and visibility, and that of the associated shipping activity. Pembrokeshire has high potential for renewable energy development, both on shore and offshore using wind, tide and wave energy sources, solar and biomass. However, these developments can have serious landscape impacts either as a result of the generating facility directly or support facilities.

Issue 7: Role of agriculture (and other land based businesses)

Agriculture and related activities (such as forestry) have been instrumental in shaping the National Park landscape and can continue to maintain and enhance that landscape and its associated biological and cultural diversity. Agriculture in Pembrokeshire is generally intensive which is often damaging, particularly to biodiversity, archaeological sites and water quality (Control of Agricultural Pollution (Wales) 2021). The steady decline of businesses in the Agriculture and Forestry sectors suggest that current economic conditions are difficult for farming and forestry, making it harder for these businesses to contribute to enhancing landscape and biodiversity, and have a sustaining role in the culture and communities of the National Park.

The Nitrates Directive (91/676/EEC) is designed to protect waters against nitrate pollution from agricultural sources. Member states are required to identify waters which are, or could become, polluted by nitrates and to designate as Nitrate Vulnerable Zones (NVZs) all land that drains to those waters.

Agriculture is a primary source of ammonia emissions and of nitrate pollution. Management of cattle manure accounts for about 40% of ammonia emissions. Nitrogen is also lost from manufactured fertilisers during application. The identification of local emissions sources is the first step in targeting mitigation options such as covering slurry stores.

An agricultural ammonia emissions attribution map (for National Network Sites receptors) – shows medium and high emission densities from the cattle sector in Pembrokeshire¹.

In 2016, Welsh Government consulted on proposals to manage agricultural nitrates, and an all-Wales approach is to be adopted.

Issue 8: The future of the built environment

The distinctiveness of the built environment of the National Park is reflected in the number of listed buildings, ancient monuments and conservation areas. However, the built environment faces a number of pressures: the availability of suitable materials and skills to restore and maintain traditional buildings; inappropriate development affecting the setting of historic buildings and the character of settlements; and adequate protection of the built environment outside conservation areas. It is important that new building and redevelopment are aesthetically appropriate and meet the highest standards for sustainability in design and construction.

Issue 9: The use of the marine environment

Coastal wildlife, coastal scenery and clean seas are key to the National Park's recreational attraction. Its coast is a major conservation asset and corridor for species movements. The boundaries of the Pembrokeshire Marine, Cardigan Bay, and Carmarthen Bay and Estuaries Special Areas of Conservation overlap around 75% of the National Park coastline. The National Park extends to Mean Low Water Mark but this is a maritime Park, and the factors which affect its maritime aspect are material considerations in the pursuit of National Park purposes and duty.

Principal factors affecting the marine environment around Pembrokeshire are shipping activity around Milford Haven, commercial fishing, and recreational uses including inappropriate use of powered craft.

Issue 10: Domestic and commercial resource use

This issue covers energy and water use, and the generation of waste, in domestic and commercial activities. It also covers resource exploitation activity such as quarrying. Use of resources is inevitable for economic and social development and the general well-being of the population. However, unsustainable and inefficient resource use impacts on the physical environment in terms of pollution, strain on ecosystems and landscape degradation.

¹ NERC Centre for Ecology and Hydrology, 2015, Assessing and Addressing Atmospheric Nitrogen Impacts on Natura 2000 Sites in Wales
<https://naturalresources.wales/media/674560/life-n2k-aaanis-report.pdf>
DEFRA, 2018, Code of Good Agricultural Practice for Reducing Ammonia Emissions

Issue 11: Important archaeological & historic resources

The National Park has 285 Scheduled Monuments, and over 10000 sites in the Historic Environment Record. There are over 1200 listed buildings and 13 designated Conservation Areas. Nine Historic Landscape areas are wholly or partly within the National Park, and there are 15 Historic Parks & Gardens in the National Park.

Issue 12: Important biological resources

There are 13 Special Areas of Conservation and 5 Special Protection Areas all or partly within the National Park, 60 Sites of Special Scientific Interest, 7 National Nature Reserves, one Local Nature Reserve and one Marine Conservation Zone.

Issue 13: Important geological resources

There are 52 Geological Conservation Review sites (sites of National or International importance) in the National Park. There is also an ongoing programme to identify Regionally Important Geological Sites (approximately 65 in the National Park).

Issue 14: Important landscape resources

Designation as a National Park is primarily due to the importance of the landscape. National Parks in the UK are classified by the International Union for the Conservation of Nature as Category 5: Protected Landscapes. These are defined as an 'area of land, with coast and sea as appropriate, where the interaction of people and nature over time has produced an area of distinct character with significant aesthetic, ecological and/or cultural value, and often with high biological diversity. Safeguarding the integrity of this traditional interaction is vital to the protection, maintenance and evolution of such an area.'²

Issue 15: Affordable Housing

House prices and rents in the National Park are significantly higher than the rest of Pembrokeshire, median sale price for houses in the National Park in 2023 was over nine times the median wage. This makes access to appropriate housing difficult for new households forming in the National Park, or existing households whose current accommodation is no longer suitable.

The Draft LHMA (March 2024) estimates a high need for one bedroomed affordable properties. The Draft LHMA estimates a need for 74% of new social rented properties to be one bedroomed in the NP.

² IUCN (1994) Guidelines for Protected Area Management Categories. Cambridge: IUCN

Issue 16: Quality of employment opportunities

Though there does not appear to be a shortage of employment opportunities in Pembrokeshire the jobs available are often low paid (over 25% of full time workers earned less than £25,000 per year in 2023) and seasonal (winter benefit claimant rates are almost double those for summer).

Issue 17: Access to services

Closure of local services and the distance of travel to some services mean that access to essential services can be difficult in some parts of the National Park. This is aggravated by the relatively high number of households (13.7% at the 2021 Census, -2.7% on the 2011 Census) that do not own a car. This is an issue that requires more thorough analysis to ensure that certain sectors of the population are not excluded, and that people are not forced into increased use of private cars to access essential services.

The 2021 Census indicates that over a third (33.2%) of usual residents are 65 and over. Additional pressures placed by this on access to services include:

- Increased demand for health care services and longer wait times
- Adaptation of public transport to accommodate older passenger; or the potential for isolation as a result of lack of provision
- Less people of working age to help provide for these needs

Issue 18: Second and holiday homes

At the 2011 Census the National Park had one of the highest rates (27.7%³) of second/holiday home use of its general housing stock in England and Wales. Further investigation of this issue using council tax data and Non-domestic rates indicates that for some of the centres in National Park this figure is significantly higher for example in Little Haven the proportion of second homes and holiday lets is ~63%, and 47% in Amroth⁴.

This is likely to impact negatively on the affordability of housing, and support for local facilities. Holiday homes are also a significant element of the tourism economy of the National Park.

Issue 19: Military use of the National Park

There are a number of Ministry of Defence sites in the National Park, and there are problems associated with these in terms of disturbance, development and the restriction of access. Conversely the military presence has protected large areas from intensive agriculture and has therefore had

³ Based on Census 2011 “Households with no usual resident”

⁴ Pembrokeshire County Council 2022

positive effects in terms of biodiversity and the archaeological resource. The military also provide employment opportunities in the National Park.

Issue 20: Accessibility of the National Park as a recreational resource for all sectors of society

The 2004 Review of the National Park Authorities in Wales reported that 'it is the view of national consultees that the majority of their visitors come from a narrow social grouping (i.e. white middle class)'. For the National Park to meet its goals for inclusivity, opportunities to use the park for recreation need to be available to all sectors of society. Serviced and self-catering accommodation needs to be available to people on a range of incomes. This inclusivity would be threatened by policies that would shift Pembrokeshire's tourism product towards the high end of the market.

The Draft LHMA (2024) shows that, within the 2021 Census, Pembrokeshire recorded a slightly higher proportion of the population as disabled under the Equality Act in 2021 than Wales (22.0% compared to 21.6%). This amounts to 27,173 people within the County. Some 46.1% of these people disabled under the Equality Act are limited a lot in their day-to-day activities with the remaining 53.9% limited a little in their day-to-day activities. It is likely that the 12,522 people disabled under the Equality Act for whom day-to-day activities are limited a lot, will form the majority of the need for accessible and adaptable provision.

Issue 21: The national role of the National Park in improving health and well-being

National Parks provide the settings in which activities that promote good health and wellbeing can take place. These include 'active' benefits such as walking or cycling and 'passive' benefits such as those gained through 'tranquillity', inspirational scenery and encounters with nature National Parks support the good quality environments that are essential to maintaining clean air, water and land without which physical and mental human health would suffer.

Issue 22: Cultural Distinctiveness

The distinctiveness of the National Park's communities is impacted by outward migration of young people and inward migration from other parts of the UK. An example of how this might manifest itself is a negative impact on the use of the Welsh language in the National Park.

The proportion of Welsh speakers in the Park is declining. At the most recent census in 2021, 19.4% of usual residents responded that they could speak Welsh compared to 21.5% at the 2011 census, a decrease of 2.1%. There are, however, communities in the National Park that this is substantial higher.

With the exception of changes in the use of the Welsh language between Censuses, elements of cultural distinctiveness are difficult to define and measure, which creates a challenge to attempts to identify and nurture the distinctive elements of National Park communities.

Issue 23: Demand for minerals

There is demand for quarried minerals, in part fuelled by poor rates of recycling and reuse of mineral resources, and this National Park is a rich mineral resource. Current working quarries are reaching the end of their lives. Though National Planning Policy would advise against mineral extraction within National Parks except in exceptional circumstances, since 2000 the National Park Authority has received six applications to extend quarrying activity at existing site or carry out exploratory work for new resources. As of April 2024 there are currently 5 active quarry sites in Pembrokeshire Coast National Park (see Page B99 of Appendix B “Baseline information”).

Issue 24: The national role of the National Park in establishing awareness, appreciation and understanding of its special qualities

The second purpose of National Parks to promote understanding the special qualities of the National Parks – and influencing attitudes and behaviour – is essential to effective conservation of the Park. The goal is to impart the values, and develop the skills and understanding to take part in informed decisions about how things can be done more sustainably. These educational outcomes are likely to reveal themselves in subtle changes in behaviour, occurring over significant periods of time. Therefore assessing the impact of the opportunities offered by the National Park in achieving these goals is likely to be difficult.

Section 5.0: Sustainability Objectives

- 5.1 The issues identified in Section 4 have been used to formulate sustainability objectives that together form a Sustainability Assessment Framework. This framework will be used to judge the sustainability of the objectives and policies of the Management Plan.
- 5.2 The list below identifies related clusters of the issues identified in section 4. In the entries for the 'Cluster of related issues' column, the number refers to the issue identified in section 4, and the text refines their context to arrive at Sustainability Objectives.
- 5.3 These objectives are intended to indicate directions for change rather than end points. For this reason no targets are set; the goal in the context of Sustainability Appraisal is full realisation of the objective. The objectives are then tested for compatibility with National Park purposes and with each other.

Sustainability Objectives and clusters of related issues:

Sustainability Objective 1: Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well-being.

Cluster of related issues: 5, 7,11,12, 14

Sustainability Objective 2: Locate developments so as to minimise the demand for travel, especially by private car

Cluster of related issues: 2,4,5,14, 17, 21

Sustainability Objective 3: Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology) with reference to the special qualities of the National Park

Cluster of related issues: 1,3,6,8,9,11,12,13,14,19,22, 23, 24

Sustainability Objective 4: Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.

Cluster of related issues: 4,16,21

Sustainability Objective 5: Increase the number of visitors using the National Park outside the peak visitor season.

Cluster of related issues: 2,3,16,21

Sustainability Objective 6: Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.

Cluster of related issues: 11,12,13,14

Sustainability Objective 7: Reduce factors contributing to climate change.

Cluster of related issues: 1,2,4,10

Sustainability Objective 8: Maximise the contribution of opportunities for development to sustain local communities.

Cluster of related issues: 3,15,16,18

Sustainability Objective 9: Encourage access for all to the National Park, reflecting the social mix of society.

Cluster of related issues: 20,21,24

Sustainability Objective 10: Maintain the cultural distinctiveness of communities.

Cluster of related issues: 2,7,8,14,15,17,18,19,22,24

Sustainability Objective 11: 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.

Cluster of related issues: 3,12,13,14,23,

Sustainability Objective 12: Reduce the negative impacts of waste.

Cluster of related issues: 5,10,12,14

Sustainability Objective 13: Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population.

Cluster of related issues: 2,3,17,18,22

Sustainability Objective 14: Maintain and enhance biodiversity both within and outside designated sites.

Cluster of related issues: 2,7,9,12,24

Sustainability Objective 15: Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.

Cluster of related issues: 1,2,5,7,9,10,12,14,20

Compatibility of objectives and National Park purposes

5.4 Under the Environment Act 1995 National Park authorities in England and Wales have two statutory purposes:

- *conserving and enhancing the natural beauty, wildlife and cultural heritage; and*
- *promoting opportunities for the understanding and enjoyment of the special qualities of those areas by the public*

5.5 In pursuing these purposes National Park authorities shall:

- *seek to foster the economic and social well-being of local communities within the National Park*

5.6 The following table outlines the relationship between the purposes and duty and the objectives set out above.

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SA Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Purpose/Duty															
to conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park	✓	✓	✓	✓/ -	-	✓	✓	✓	-	✓	✓	✓	-	✓	✓
to promote opportunities for public enjoyment and understanding of the special qualities of the National Park	-	✓	✓	✓	✓	-	-	0	✓	✓	✓	✓	✓	✓	✓
to foster the economic and social well-being of communities living within the National Park	✓	✓	✓	✓	✓	✓	0	✓	✓	✓	✓	✓	✓	✓	✓

✓ Compatible; x Incompatible; 0 Neutral; - No substantive relationship

5.7 The objectives identified are predominantly compatible with National Park purposes and its duty, and all are relevant to at least one of the three. Some objectives represent possibly mixed outcomes in relation the purposes and duty, but in all but one case the hierarchy of purposes and duty is maintained (in no case is a compatible outcome for the second purpose or duty achieved at the cost of a mixed outcome for the first purpose). The uncertainty regarding the relationship between the purposes and duty, and objective 7 reflects the uncertainty surrounding the precise nature of the effect of climate change in the National Park, and the fact that some effects may be deemed positive and others negative.

Compatibility of objectives with the Well-being of Future Generations Act 2015

- 5.8 The Well-being of Future Generations Act 2015 concerns the embedding of the principle of sustainable development into all of the work carried out by public bodies and places a requirement on all public bodies to set out how they will progress the 7 well-being goals set out in the Act. As overarching sustainable development framework for Wales it is essential that sustainability appraisal of the Management Plan has full regard for the Act and its goals.
- 5.9 The following table examines the compatibility and coverage between the Sustainability Appraisal Objectives and the 7 well-being goals of the Well-being of Future Generations Act 2015.

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Compatibility with the Well-Being Goals

✓	Compatible
×	Incompatible
0	Neutral
?	Uncertain

Well-Being of Future Generations Act – Goals SA Objectives	A prosperous Wales.	A resilient Wales.	A healthier Wales.	A more equal Wales.	A Wales of cohesive communities.	A Wales of vibrant culture and thriving Welsh language.	A globally responsible Wales.
1	✓	✓	0	✓	✓	✓	✓
2	✓	0	✓	0	✓	✓	✓
3	✓	✓	✓	0	0	✓	✓
4	0	0	✓	0	0	✓	✓
5	✓	0	0	0	✓	✓	0
6	0	✓	✓	0	✓	0	0
7	✓	0	0	0	0	0	✓
8	✓	✓	0	0	✓	✓	✓
9	0	✓	✓	✓	✓	✓	✓
10	0	0	0	0	0	✓	✓
11	✓	✓	0	0	0	0	✓
12	✓	✓	✓	0	0	0	✓
13	0	0	✓	0	✓	✓	0
14	✓	✓	0	0	0	0	✓
15	✓	✓	0	0	0	0	✓

5.10 The Sustainability Appraisal Objectives are largely compatible with the Well-being goals, with the majority of the goals being contributed to by at least 7 of the Sustainability Appraisal Objectives. The exception is “A more equal Wales”, which has very minimal coverage within the Sustainability Appraisal criteria. The Equalities Impact Assessment will ensure that this well-being goal is more effectively considered during the Management Plan review.

Inter-compatibility of the Sustainability Appraisal Objectives:

1 (Economic viability and conservation role of agriculture and forestry)															
2 (Locate developments so as to minimise the demand for travel, especially by private car)	-														
3 (Conservation of landscapes, townscapes, etc.)	✓	✓													
4 (Increase physical forms of recreation)	-	✓	?												
5 (Increase visitors outside the peak visitor season)	-	x	?	-											
6 (Manage the effects of climate change)	✓	-	✓	-	-										
7 (Reduce factors contributing to climate change)	✓	✓	✓	✓	x	✓									
8 (Contribution of development to sustaining local communities)	✓	-	-	-	✓	-	-								
9 (Encourage access for all to the National Park)	-	?	-	-	-	-	?	-							
10 (Maintain the cultural distinctiveness of communities)	✓	✓	✓	-	-	-	-	✓	-						
11 (The adverse effects and potential gains of minerals exploitation)	-	-	✓	-	-	✓	✓	-	-	-					
12 (Reduce the negative impacts of waste)	-	-	✓	-	-	-	✓	-	-	-	✓				
13 (Community facilities continue to meet the needs of the population)	✓	✓	-	✓	?	✓	✓	✓	-	✓	-	-			
14 (Maintain and enhance biodiversity)	✓	✓	✓	?	?	✓	✓	-	-	-	✓	✓			
15 (Sustainable use and quality of inland and coastal waters)	✓	✓	✓	✓	?	✓	✓	✓	-	-	✓	✓	✓	✓	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	

✓ Compatible; x Incompatible; 0 Neutral; - No substantive relationship

Notes for potentially incompatible objectives:

Objectives 2 and 5: visitors outside the peak visitor season are more likely to experience inclement weather, and therefore more likely to use their cars for transport.

Objectives 5 and 7: again visitors outside peak season are more likely to use their cars. Additionally there may be more requirements for heating in tourist accommodation, which many be old or of low energy efficiency.

Relevance of the Sustainability Appraisal Objectives to the Other Assessment Processes to be carried out on the National Park Management Plan

5.11 Habitats Regulations Assessment:

- Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well-being.
- Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology) with reference to the special qualities of the National Park
- Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health
- 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
- Maintain and enhance biodiversity both within and outside designated sites
Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.

5.12 Welsh Language Impact Assessment:

- Maintain the cultural distinctiveness of communities
- Encourage and facilitate access, for all to the National Park, reflecting the social mix of society
- Maximise the contribution of opportunities for development to sustaining local communities
- Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well-being.

5.13 Equality, Socio Economic, Health and Human Rights Impact Assessment:

- Encourage and facilitate access, for all to the National Park, reflecting the social mix of society
- Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population
- Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters
- Maintain the cultural distinctiveness of communities
- Maximise the contribution of opportunities for development to sustaining local communities
- Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health

- Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.
- Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well-being.

5.14 **Well-being of Future Generation Assessment – Well being Goals/ 5 Ways of Working**

- All sustainability objectives in the Sustainability Appraisal

Relationship between Sustainability Objectives and the issues identified in Annex 1 of the SEA Directive (2001/42/EC)

5.11 The SEA Directive requires assessment of the likely significant effects on the environment with regard to the issues in the table below. The objectives that cover each SEA issue are shown.

SEA Directive	Sustainability Objective (s)
Biodiversity	1; 6; 11; 14
Population	2; 6; 8; 10; 13; 15
Human health	2; 4; 6; 9; 12; 13; 15
Fauna	1; 6; 11; 14
Flora	1; 6; 11; 14
Soil	1
Water	1; 12; 15
Air	2; 7
Climatic factors	2; 6; 7
Material assets	3; 6; 13; 15
Cultural heritage (including architectural & archaeological heritage)*	1; 3; 8; 10
Landscape	1; 3; 11; 12; 14; 15

*These terms are not clearly defined in the Directive. 'Population' is taken to mean the demography and quality of life; 'Material assets' is taken to mean resources and infrastructure.