

Pembrokeshire Coast National Park

National Park Management Plan “*A Partnership Plan for the National Park*” (2025-2029)

Draft Initial Sustainability Appraisal Report

PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY

19th June 2024

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1.0 Summary and key assessment outcomes

Regulatory & legislative context

- 1.1 European Directives and United Kingdom legislation requires the formal assessment of certain plans and programmes that are likely to have significant effects on the environment; this definition includes National Park Management Plans. 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. The sustainability of the Pembrokeshire Coast National Park Management Plan has been assessed through a process of Sustainability Appraisal incorporating a Strategic Environmental Assessment (working draft *Designated Landscape Management Plan Guidance Volume 2, Appendix C, para C.2, 2024*).

Sustainability Objectives

- 1.2 For the purposes of the Sustainability Appraisal of the Pembrokeshire Coast National Park Management Plan, in accordance with guidance from the Welsh Government and United Kingdom Governments, sustainability is defined in terms of a sustainability framework made up of Sustainability Objectives. These were subject to consultation with Natural Resources Wales (NRW) and Cadw as part of the consultation on the Scoping Report and have been amended to take account of their comments. The sustainability objectives below are not ordered in terms of importance:
 - i. Economically viable agriculture and forestry sectors play a key role in managing, conserving and enhancing natural resources, landscape, biodiversity, including habitats, ecological resilience, nature based solutions that reduce flood risk and contribute to community well-being.
 - ii. Minimise the demand for travel, especially by private car, reduce the impacts of road transport, and enhance opportunities and encourage use of alternatives.
 - iii. 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.
 - iv. Sustainably increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities, balancing against environmental limits.
 - v. Increase the number of visitors using the National Park outside the peak visitor season.
 - vi. Manage the effects of and adapt to climate change with particular reference to the risk of flooding, coastal erosion and coastal squeeze which could negatively impact on existing habitats and biodiversity, infrastructure including the National trail and community, social, economic and well-being including public health.

- vii. Mitigate and reduce factors contributing to climate change by reducing greenhouse gas emissions from transport and energy use.
- viii. Maximise the contribution of the limited opportunities for development to sustaining local communities.
- ix. Encourage and facilitate access for all to the National Park, reflecting the social mix of society.
- x. Maintain the cultural distinctiveness of communities.
- xi. 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.
- xii. Reduce the negative impacts of waste.
- xiii. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population.
- xiv. Maintain and enhance biodiversity, ecological resilience, habitats and habitat connectivity both within and outside designated sites.
- xv. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.

1.3 More information regarding the development of the Sustainability Objectives can be found in Section 4.0.

What would happen in the absence of the National Park Management Plan?

1.4 Guidance on Sustainability Appraisal and the Strategic Environmental Assessment Directive require that the likely evolution of the Plan area in the absence of the Management Plan is considered. Many of the Sustainability Objectives for the National Park are subject in large part to policy and activity beyond the remit of the Management Plan. The working draft *Designated Landscape Management Plan Guidance Part 1 (2024)* advises at para 2.19 (page 17) that "Designated Landscape management plans should present an integrated approach to the planning and management of the Designated Landscape at a strategic level. It is a plan for the geographic area of the designation and not for any one authority. They are important policy document for each Designated Landscape and no major decisions should be taken affecting the future of a Designated Landscape without reference to its management plan."

1.5 It is not enough to co-ordinate existing action, but also to determine whether that action is sufficient to affect (improve) the state of the Park in a timely way. Thus, the process of preparing a Management Plan should also identify where new action, or new

scales of action, are required to achieve National Park purposes. This has been the case. In the absence of the Management Plan, these additions would have had to have been incorporated – if possible – within other plans. However, it is not clear whether the actions would have been identified in the absence of the Management Plan process. Furthermore, iterative Sustainability Appraisal of the Management Plan has identified additions to a number of policy impacts. In the absence of the Management Plan (and the process which gives rise to it), there is no way of determining the sufficiency of action in relation to Park purposes (also see Section 4 paragraphs 4.10 and 4.11).

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Appraisal of the National Park Management Policies

- 1.6 This Initial Sustainability Appraisal has been carried out on the draft National Park Management Plan 2025-2029. The policies of the Management Plan include specific actions and often specific areas of the National Park that will be targeted for these actions.
- 1.7 The Management Plan process is orientated to achieving progress on National Park purposes and the duty in pursuit of them. Thus, it is entirely congruent with the Sustainability Appraisal, and the two processes might be expected to converge on very similar conclusions. In practice, this has been the case. However, since the Management Plan process and Sustainability Appraisal have been led by different officers, the Sustainability Appraisal has resulted in the addition and refinement of policy impacts and has also provided an additional, independent means of querying the sufficiency of the scale of Management Plan proposals. The change log for Management Plan policies identifies the alterations that have arisen from Sustainability Appraisal.
- 1.8 The policies of the National Park Management Plan were assessed to predict their impacts with regard to the Sustainability Objectives. Where the appraisal raised questions regarding the sustainability of a policy, or where the appraisal identified opportunities to further increase the sustainability benefits of a policy, a recommendation for change was made.

What will be the cumulative impacts of the Plan's proposals?

- 1.9 It is a requirement of Sustainability Appraisal and Strategic Environmental Assessment that policy options are not only considered singly, but that their cumulative effects are also assessed. The net impact of all policies was determined against each Sustainability Objective. From this exercise it was found that there are no undesirable cumulative effects on any of the Sustainability Objectives.

How will other Plans impact?

- 1.10 As an over-arching plan for the achievement of National Park purposes within the National Park, the Management Plan is reliant on other plans for delivery. These include:
 - Action Plan for Pollinators Wales (Review 2013-18 and Future Actions), Welsh Government
 - Cardigan Bay Special Area of Conservation Management Scheme, 2008
 - Carmarthen Bay and Estuaries European Marine Site Management Scheme, 2013
 - Invasive Non-Native Species action plan, Pembrokeshire Nature Partnership
 - *Marine Area Statement*, Natural Resources Wales
 - Nature Recovery Action Plan for Pembrokeshire, 2018, Pembrokeshire Nature Partnership
 - Pembrokeshire Marine Special Area of Conservation Management Scheme, 2008
 - Rights of Way Improvement Plan for Pembrokeshire 2018-2028, Pembrokeshire County Council and Pembrokeshire Coast National Park Authority
 - *South-West Wales Area Statement*, Natural Resources Wales
 - *Wales National Marine Plan*, Welsh Government
 - Well-being Plan for Pembrokeshire 2023, Public Services Board

- Pembrokeshire Climate Adaptation Strategy 2022, Public Services Board
- Pembrokeshire Coast National Park Authority's adopted Local Development Plan 2
- Western Wales River Basin Management Plan 2021-2027, Natural Resources Wales
- **Natural Resources Wales Flood Risk Management Plan: South West Wales Place, Natural Resources Wales (2023 – 2029)**

How were the Policies chosen for the Management Plan?

1.11 The draft management Plan 2025-2029 includes a section on The State of the Park. This presents evidence and narrative on opportunities and challenges to achieving National Park purpose and the National Park Authority's duty in pursuit of them. The State of the Park information was developed from the baseline information collated as part of the initial evidence gathering process for the SA Scoping Report. The policies are expressed as desired outcomes for 2030 across four themes: conservation, connection, climate and natural resources and communities.

Conservation

- conserve and enhance landscape and seascape quality.
- preserve distant, uninterrupted views and open horizons.
- promote ecosystem recovery at scale and improve the state of wildlife on land and in the marine environment (as a milestone to clear recovery by 2050).
- achieve favourable conservation status on high nature value sites.
- maintain and enhance species for which Pembrokeshire is uniquely important.
- increase the connectivity of the landscape for wildlife.
- reduce the impact of light pollution on wildlife.
- conserve earth heritage.
- conserve and improve soil health and enhance natural carbon stores.
- address the impacts of invasive species and plant pathogens.
- reduce pollution from phosphates, nitrates and ammonia.
- reduce plastics and microplastics in the environment.

Connection

- conserve and enhance landscapes of particular historic interest, including, Conservation Areas, scheduled monuments, listed buildings and their settings.
- enable appropriate public access to heritage assets.
- promote the Welsh language and local dialects, and celebrate culture and creativity related to the landscape.
- provide outdoor learning opportunities, in particular for children.
- provide sustainable outdoor recreational opportunities for a full cross-section of society, and increase the frequency of people's participation.
- manage potential / actual recreational pressures such as those arising from unauthorised camping and congestion.
- improve water quality at designated bathing beaches.

Climate and natural resources

- halve carbon emissions within the National Park area (a milestone to achieving carbon-neutrality in the National Park area by 2050)
- proactively respond to climate change impacts on e.g. coastal communities, road and infrastructure, rights of way
- conserve and improve soil health and enhance natural carbon stores (including stores in marine and coastal environments)
- reduce pollution from phosphates, nitrates and ammonia
- improve water quality at designated bathing beaches
- eliminate environmental harm from storm overflow sewage discharges

Communities

- provide an appropriate range of homes to support local communities
- support an appropriate range of employment opportunities
- adapt to the needs of an aging population
- protect and promote the Welsh language
- become a model of regenerative tourism
- support land managers to deliver regenerative agriculture
- maintain and extend sustainable transport and active travel options
- support viability and accessibility of local community services

These have given rise to the draft policy and action areas outlined in the draft Management Plan.

2.0 Appraisal Methodology

- 2.1 Accordance with the sustainable development principle is defined in the Well-being of Future Generations Act (Wales) 2015:

“In this Act, any reference to a public body doing something “in accordance with the sustainable development principle” means that the body must act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs” (Section 5: Sustainable Development Principle (1)).

- 2.2 The 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, its goals and how the Sustainability Objectives contribute to them can be found in Section 5 of the Sustainability Appraisal Scoping Report (April 2024).

- 2.3 Guidance on National Park Management Plan preparation (working draft, 2024) published by Natural Resources Wales (NRW) advises that the requirements of SEA and SA can be met in a single appraisal.

- 2.4 Sustainability Appraisal is an iterative process; this means that assessment will be carried out at the earliest opportunity on emerging policy to ensure that the development of the National Park Management Plan is informed by the process throughout.

Components of the Sustainability Appraisal

- 2.5 The stages to the Sustainability Appraisal of the National Park Management Plan are as follows:
- i. Scoping - setting the context and objectives, establishing the baseline and deciding on the scope;
 - ii. Assess the National Park Management Plan policies against the Sustainability Objectives and produce a draft Sustainability Appraisal Report;
 - iii. Produce Final Sustainability Appraisal Environmental Report;
 - iv. Produce a Sustainability Statement stating how the findings of the Sustainability Appraisal have been taken into account in the final Plan

2.6 The scoping stage was completed in June 2024, with consultation with the statutory consultees (Cadw and Natural Resources Wales). Responses received from Cadw and NRW have been considered and changes made to the Scoping Report and have informed the Sustainability Appraisal. A Report of Consultation on The Draft Scoping Report has been prepared and is available to view on the National Park’s website. The completed scoping report will be available from the offices of the Pembrokeshire Coast National Park Authority, or from its website, www.pembrokeshirecoast.wales. The key findings of the scoping process, the sustainability issues and the Sustainability Objectives against which the Management Plan were appraised, are included in this report.

2.7 The second stage was carried out between April 2024 and June 2024 during the process of policy formulation for the National Park Management Plan.

2.8 The full timetable for the National Park Management Plan is in the table below. This was approved by the National Park Authority at its meeting of 20th December 2023.

Ref.	Milestone	When	Resourcing
1	Collate review evidence and align current content with Delivery Plans.	Ongoing	Strategic Policy Team
2	Obtain Authority approval for timeline and approach.	20th Dec 2023	Strategic Policy Team
3	Notify statutory bodies of intent to review (legal requirement).	January 2024	Strategic Policy Team
4	Engage with stakeholders on the National Park’s special qualities.	January – March 2024	<ul style="list-style-type: none"> Strategic Policy Team Delivery Plan leads
5	Convene Focus Group and / or Member Workshops to discuss draft reports and assessments. Possible topics, led by heads of department, include: <ul style="list-style-type: none"> Nature Recovery (including marine) Climate Adaptation (including coastal change) Communities Equalities/Inclusion Decarbonisation 	January – April 2024 <ul style="list-style-type: none"> 17th Jan 2024 and 17th April 2024 	<ul style="list-style-type: none"> Delivery Plan leads Performance and Compliance Co-ordinator External consultants (shadow Habitats Regulations Assessment)

Ref.	Milestone	When	Resourcing
	Engagement can also afford a way of engaging with people on the Authority's Delivery Plans.		
6	<p>Obtain Authority approval of consultation draft content:</p> <ul style="list-style-type: none"> National Park Management Plan Equality Impact Assessment (including consideration of socio-economic duty impacts^[1], and, if required, of health impacts) Habitats Regulations Assessment Sustainability Appraisal / Strategic Environmental Assessment^[2] Welsh Language Assessment <p><i>Note: the Management Plan will also be assessed against the seven well-being goals for Wales and five ways of working under the Well-being of Future Generations (Wales) Act (2015), to ensure that all classes of potential impact have been identified.</i></p>	National Park Authority May 2024 (note: this date was amended to 19 th June 2024)	<ul style="list-style-type: none"> Strategic Policy Team Performance and Compliance Co-ordinator Delivery Plan leads Easy-Read content (external) Translation (external)
7	<p>Undertake public consultation (12 weeks), via, for example:</p> <ul style="list-style-type: none"> engagement website: evidence, policies, impacts, mapping etc online drop-ins/fora questionnaires County Show 	July - September 2024	<ul style="list-style-type: none"> Strategic Policy Team Communications Team Delivery Plan leads
8	<p>Present report of consultations to Authority. Obtain Authority comment on and approval of proposed amendments.</p>	National Park Authority October 2024	<ul style="list-style-type: none"> Delivery Plan leads Strategic Policy Team

Ref.	Milestone	When	Resourcing
9	Revise documents in line with 7.	October / November 2024	<ul style="list-style-type: none"> • Strategic Policy Team • Performance and Compliance Co-ordinator • Translation of amendments (external) • Easy-Read amendments (external) • Shadow Habitats Regulations Assessment - check against amendments (external)
10	Publish approved Management Plan content and assessments (online); report of consultation, feedback to consultees, formal notification / adoption statements.	November / December 2025	Strategic Policy Team

[\[1\]](#) In the context of the Equality Act this duty relates to reducing the inequalities of outcome which result from socio-economic disadvantage. It is appropriate therefore to incorporate it into the Equality Impact Assessment.

[\[2\]](#) To include the Biodiversity and Resilience of Ecosystems Duty (“the Section 6 duty”) set out in the Environment (Wales) Act 2016, and decarbonisation.

2.9 The policies in the Draft National Park Management Plan have been appraised against each of the Sustainability Objectives using the matrices shown in Appendix C.

2.10 The Strategic Environmental Assessment directive requires that authorities 'which, by reason of their specific environmental responsibilities, are likely to be concerned by the environmental effects of implementing plans and programmes' be consulted on the scoping process of the assessment. European Union member states are required to identify such authorities as designated consultation bodies. In Wales the designated consultation bodies are the Natural Resources Wales and CADW.

2.11 The designated consultation bodies and the public were consulted on the scoping report for the Sustainability Appraisal between 26th April 2024 and 31st May 2024.

Changes have been made to incorporate the comments made by Cadw and NRW. The report on this consultation will be made available on the Pembrokeshire Coast National Park Authority web site.

2.12 The Strategic Environmental Assessment directive requires that the designated consultation bodies and the public be consulted on the Environmental Report. This report of the Sustainability Appraisal is that Environmental Report. Consultation on the report of the Sustainability Appraisal of the Pembrokeshire Coast National Park Draft National Park Management Plan will take place at the same time as the consultation on the draft National Park Management Plan 2025-2029. Twelve weeks will be allowed for the consultation.

Difficulties encountered with information or carrying out assessment

2.13 The principal difficulty in carrying out the Sustainability Appraisal has been the lack of information and understanding of many of the issues of interest, combined with large volumes of information and data for others. The problems associated with lack of information are clear, but too much information is also a problem for Sustainability Appraisal as the time and resources are not available to find, process and evaluate the information to ensure that the best information is included in the appraisal.

2.14 The problem of lack of relevant information is further aggravated in National Parks as the geography at which much information and data are published does not match or nest within the National Park. This means that information used in the Sustainability Appraisal often refers to the Local Authority area of which the National Park is a part, even though it may not always be appropriate to assume that the two areas are equivalent with regard to the data or information in question.

2.15 The lack of quality information on all issues for the National Park area carries with it two key risks for the Sustainability Appraisal:

- i. it will not be possible to confidently predict the impacts of the Plans in all cases, and may not be possible to accurately monitor the effects of implementing the Plans;
- ii. what is measured, or easily measurable, will define what is important in the Sustainability Appraisal. In other words, issues for which no good evidence exists become less important, or even fail to feature, in the Sustainability Appraisal, even when the majority of stakeholders would agree they are real and important.

2.16 The Pembrokeshire Coast National Park Authority has attempted to deal with the second risk by consulting external organisations and officers of the Authority in order to identify sustainability issues, as well as identifying issues emerging from the baseline

information gathered. The first risk is more difficult to deal with as it will require changes in the geographies at which data and information are disseminated, which may not always be possible due to risk of disclosure of personal and sensitive information, or because the data may not be statistically valid for small areas; or will require new data gathering systems and projects, which are likely to involve substantial resources.

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3.0 Background

Purpose of Sustainability Appraisal

- 3.1 The purpose of Sustainability Appraisal is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of the Pembrokeshire Coast National Park Management Plan 2020-2024. The process involves testing the Management Plan's proposed new policies against the framework of Sustainability Appraisal Objectives. The Sustainability Appraisal process informs the development of the policies, and tests the policies that have been included in the draft National Park Management Plan.
- 3.2 European Union Directive 2001/42/EC on "the Environmental Assessment of Plans and Programmes" requires that a Strategic Environmental Assessment (SEA) be carried out for land use plans and programmes likely to have a significant effect on the environment. The Pembrokeshire Coast National Park National Park Management Plan is such a plan and is therefore subject to Strategic Environmental Assessment.
- 3.3 This report documents the Sustainability Appraisal and its incorporated Strategic Environmental Assessment.

Compliance with SEA directive/regulations

- 3.4 The Strategic Environmental Assessment Directive has a number of requirements:
 - i. The preparation of an Environmental Report, the requirements of which are included in this report of the Sustainability Appraisal.
 - ii. Consultation with authorities with environmental responsibility, and the wider public. This report is subject to a minimum, six week consultation period with Statutory Consultees for Strategic Environmental Assessment (Natural Resources Wales and Cadw)) and the public. This consultation will occur at the same time as the consultation on National Park Management Plan.
 - iii. That the Environmental Report and the results of consultation are taken into account in decision-making. The impact of the Sustainability Appraisal to date in shaping the National Park Management Plan.
 - iv. Provision of information on the decision. This requirement will be met in the form of the published adopted plans, and in an environmental statement documenting how the Sustainability Appraisal has influenced the Plans to be produced once the plans have been adopted.
 - v. Monitoring. The proposed sustainability monitoring framework is outlined in section 6 of this report.
- 3.5 The Strategic Environmental Assessment Directive requires assessment of the likely significant effects on the environment with regard to the issues in the table below. The

Sustainability Objectives that cover each Strategic Environmental Appraisal issue are shown.

Strategic Environmental Assessment Directive issue	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.**

4.0 Sustainability context, baseline & objectives

Other relevant policies, plans and programmes

4.1 The key plans that will affect the National Park Management Plan are:

- Wales National Marine Plan, Welsh Government (2019)
- **State of Natural Resources Report (SoNaRR) for Wales 2020**
- Marine Area Statement and South West Area Statement, Natural Resources Wales
- National Park Management Plan Guidance and Advice, Countryside Council for Wales 2007 and Natural Resources Wales 2014, updated by working draft Designated Landscape Management Plan Guidance, Natural Resources Wales 2024.
- Future Wales: The National Development Plan 2040.
- Pembrokeshire Coast National Park Authority's adopted Local Development Plan 2.
- *Nature Recovery Plan for Pembrokeshire*, Pembrokeshire Nature Partnership, June 2018
- *Pembrokeshire Well-being Plan*, Public Services Board, May 2023
- Pembrokeshire Climate Adaptation Strategy 2022, Public Services Board
- *Valued and Resilient: The Welsh Government's Priorities for the Areas of Outstanding Natural Beauty and National Parks*, Welsh Government, July 2018
- *Vital nature: Making the connections between biodiversity and the people and places of Wales*, Natural Resources Wales, July 2018
- *Natural Resources Policy*, Welsh Government, 2017
- Western Wales River Basin Management Plan 2021-2027, Natural Resources Wales
- **Natural Resources Wales Flood Risk Management Plan: South West Wales Place, Natural Resources Wales (2023 – 2029)**
- Wales Biodiversity Deep Dive

Social, environmental and economic baseline

4.2 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. It is drawn from a range of sources, including National Park Authority data.

4.3 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 where possible the situation in the past and projections for the future, in order to indicate trends.

4.4 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 may be identified and/or acquired.

Data limitations

4.5 Collection of baseline data for Sustainability Appraisal is subject to three difficulties:

- i. The data for an issue of interest may not be available or not have been collected.
- ii. Timeliness of data - the only data available for an issue may be unacceptably out of date. Alternatively current data may be available, but there are no historic datasets to identify trends.
- iii. 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 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.

4.6 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.

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

Likely changes in the environmental, social and economic context in the absence of the Plans

4.8 Guidelines for Sustainability Appraisal and the Strategic Environmental Assessment Directive require that the appraisal includes a forecast of the likely sustainability outcomes in the absence of the Plan – the 'business as usual' scenario. Understanding the likely future evolution of the area in the absence of the Plan is important for determining the impact of the Plan. Also, if the Plan outcomes were forecast to be no better, or worse, than the business as usual scenario, this would provide a clear indicator that the Plan needed significant improvement.

4.10 Section 66 (1) of the Environment Act 1995 requires every National Park Authority to “prepare and publish a plan, to be known as a National Park Management Plan, which formulates its policy for the management of the relevant Park and for the carrying out

of its functions in relation to that Park.” The working draft *Designated Landscape Management Plan Guidance Part 1 (2024)* advises at para 2.19 (page 17) that “Designated Landscape management plans should present an integrated approach to the planning and management of the Designated Landscape at a strategic level. It is a plan for the geographic area of the designation and not for any one authority. They are important policy document for each Designated Landscape and no major decisions should be taken affecting the future of a Designated Landscape without reference to its management plan.”

4.11 It is not enough to co-ordinate existing action, but also to determine whether that action is sufficient to affect (improve) the state of the Park in a timely way. Thus, the process of preparing a Management Plan should also identify where new action, or new scales of action, are required to achieve National Park purposes. This has been the case. In the absence of the Management Plan, these additions would have had to have been incorporated – if possible – within other plans. However, it is not clear whether the actions would have been identified in the absence of the Management Plan process. Furthermore, iterative Sustainability Appraisal of the Management Plan has identified additions to a number of policy impacts. In the absence of the Management Plan (and the process which gives rise to it), there is no way of determining the sufficiency of action in relation to Park purposes.

Sustainability Issues

4.9 The following resources were used to identify Sustainability Issues:

- The Policies, Plans and Programmes relevant to the National Park Management Plan;
- Baseline information gathered
- The experience of officers in the National Park Authority of issues faced when working on behalf of the Authority;

4.10 The issues identified through the above process are summarised below and are not ordered in terms of importance.

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 and coastal squeeze. This would negatively impact existing habitats and biodiversity, infrastructure including the National trail and communities. On top of this the country is expected to experience more frequent and intense rainfall, hotter drier summers which impacts on agriculture and land

management. It is necessary to mitigate and adapt to the changing climate to protect the landscape, resilience to flooding, ecological resilience and community, social and economic well-being.

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, potential for wildfires resulting from BBQs 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

Landscape change modelling in response to a changing climate and nature recovery can promote awareness, engagement and support communities.

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. However, the move to electric vehicles may help to address air quality particularly around major roads.

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: Protection of the physical environment

Natural resources, such as air quality, water supply and quality and soil quality need to be protected. 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 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 general, river quality is classed as moderate under the Water Framework Directive. Priority issues affecting water quality in the Park include diffuse and/or point source pollution, physical alteration and/or alien species. 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. The main causes of phosphorous entering rivers is agricultural run off from use of fertilizers, manure and soil erosion, waste water discharges and storm water run off, industrial activities and natural sources. High levels of phosphorous can lead to algal blooms, oxygen depletion causing harm to aquatic ecosystems. In January 2024, NRW published an assessment of the compliance of Welsh River SACs against a number of other water quality targets including Dissolved Oxygen and total and unionised ammonia. Afonydd Cleddau and Teifi were amongst those with most target failures. Bathing water quality in the National Park is generally classed as good or excellent, however, there can be issues with storm

overflows impacting bathing water quality. Water quality impacts upon overall ecological resilience and ecology and biodiversity as well as impacts on quality for drinking water and recreational activities.

The Eastern and Western Cleddau catchments provide most of Pembrokeshire's public water supply. These rivers are designated Special Areas of Conservation (SACs) and are afforded a high level of environmental protection which can result in potential conflict with demand for water.

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) which national planning policy specifies should be conserved as a finite resource for the future. 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. Future developments, climate change and farming practices have the potential to impact on soil erosion, loss of soil, nutrients and carbon stores, soil run-off and degradation of soil. Nature based solutions can alleviate the risk and protect soil.

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 the potential to 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. Changes to the type of agricultural practices and agricultural land management as a consequence of the changing climate and evolving fiscal policy will be a significant factor affecting the national park's landscape, resilience to flooding, ecological resilience and community social and economic well-being.

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 2021 the designated Nitrate Vulnerable Zones were revoked by the introduction of the Water Resources (Control of Agricultural Pollution) (Wales) Regulations. The Welsh Government has declared an all-Wales Nitrate Vulnerable Zone(NVZ).

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

¹ NERC Centre for Ecology and Hydrology, 2015, [Assessing and Addressing Atmospheric Nitrogen Impacts on Natura 2000 Sites in Wales](#)

DEFRA, 2018, Code of Good Agricultural Practice for Reducing Ammonia Emissions

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, together with increasing demand for aquaculture, renewable energy (issue 6) and recreation (issue 20), 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.

Issue 11: Protect, promote, conserve and enhance important archaeological & historic resources

The national park has a duty to protect, promote, conserve and enhance the historic environment. 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: Maintain and enhance important biological resources

There is a requirement to maintain and enhance 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. The step-wise approach and the DECCA framework set out in Planning Policy Wales will be the means to demonstrate the steps have been taken towards securing a net benefit for biodiversity and improve habitat connectivity and ecological resilience.

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 need

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.

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

⁴ Pembrokeshire County Council 2022

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 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 opportunity of the National Park to improve 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.

Sustainability Objectives

- 4.11 The issues identified above have been used to formulate sustainability objectives that together form the Sustainability Assessment Framework. This framework will be used to judge the sustainability of the objectives and policies of the Management Plan.
- 4.12 Listed below are the clusters of related issues identified in section 4. In the entries for the 'Cluster of related issues', the number refers to the issue identified in the list above.
- 4.13 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 play a key role in managing, conserving and enhancing natural resources, landscape, biodiversity, including habitats, ecological resilience, nature based solutions that reduces flood risk and community well-being. **Cluster of related issues:** 1, 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:** 1,2, 3,6,7, 8,9,11,12,13,14,19,22, 23, 24

Sustainability Objective 4: Sustainably increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities, balancing against environmental limits. **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 and adapt to climate change with particular reference to the risk of flooding, coastal erosion and coastal squeeze which could negatively impact on existing habitats and biodiversity, infrastructure including the National trail and community, social, economic and well-being including public health. **Cluster of related issues:** 5, 7, 11,12,13,14, 17

Sustainability Objective 7: Mitigate and reduce factors contributing to climate change by reducing greenhouse gas emissions from transport and energy use. **Cluster of related issues:** 1,2,4, 7, 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, 5, 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, 20, 21, 22

Sustainability Objective 14: Maintain and enhance biodiversity, ecological resilience, habitats and habitat connectivity both within and outside designated sites. **Cluster of related issues:** 2, 5, 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

5.0 Sustainability Appraisal of the Management Plan Policies

How has the Sustainability Appraisal Process influenced the development of the National Park Management Plan Policies?

- 5.1 In keeping with an iterative approach, where the outputs of the previous cycle form the basis of the next review, many of the draft Management Plan policies remain relevant and are little changed, i.e. they go into this review informed by the previous Sustainability Appraisal / Strategic Environmental Assessment, and Habitats Regulations Assessment. (Updated knowledge, procedures or external factors may still of course impact the assessment of even relatively unchanged policies.)
- 5.2 No changes to the policies have been recommended through the SA process in this iteration of the Management Plan. The table below details the changes that were suggested for the previous version of the plan and how they relate to the 2025-2029 version of the plan.

Iteration/policy version:	2020-2024 Policy:	Suggested change:	Result:	2025-2029 Policy
1	L1: Conserve and enhance National Park landscapes and seascapes.	Add creation of hedgerows to c.	Added: "...and create hedgerows" to part c. of the policy.	Now included under H1/F, restoration of traditional boundaries
1	L2: Protect and enhance dark night skies	Look at the scope to include policy measures for engagement.	Included as part of Policy L2: Provide and promote inspiring outdoor learning and personal development opportunities for all.	Unchanged, covered by L2.
1	W2: Provide and promote inspiring outdoor learning and personal development opportunities for all.	Suggest adding further policy measures that expand inclusiveness across a wider social spectrum.	Policy has been changed to be more general regarding opportunities rather than focusing on one age group.	Unchanged.
2	W2: Provide and promote inspiring outdoor learning and personal development opportunities for all. (Second iteration).	Suggest that something could be added to this policy or policy L2 along the lines of wider guidance on enjoying dark skies activities in the National Park.	Added: "...subject to <u>guidance and adequate mitigation...</u> " to part d. of the policy.	Moved to L2.
1	N1: Contribute to a low carbon economy for Wales and adapt to climate change	Suggest referring to agricultural diversification and the management of natural resources in the agriculture and forestry sectors.	Policy now refers to Welsh Government's "Prosperity for All" strategy, which includes the agricultural economy.	Still included under N1, policy now aims to specifically contribute to a carbon-neutral Wales.
1	N4: Reduce air pollution.	Suggest expanding the policy to include other air pollutants (focus was on nitrate).	Refer to other policies where other air pollutants are covered.	Policy N5 renamed to "Protect air quality" and supports air quality in general as

Iteration/policy version:	2020-2024 Policy:	Suggested change:	Result:	2025-2029 Policy
				per suggestion.
2	N4: Reduce air pollution (second iteration).	Suggest adding a statement in the impacts regarding monitoring other pollutant trends.	No change to the policy. The following impact was added: monitor pollutant trends (e.g. oxides of nitrogen, carbon monoxide and particulates) during the Management Plan period.	As above

Summary of the Sustainability Appraisal of the Management Plan Policies

5.3 A summary of the key findings of the Sustainability Appraisal of the National Park Management Plan Policies is provided below. For the detailed appraisal of the policies see appendix C.

General (policies from across the topic areas set out by the National Park Management Plan)

- 5.4 Policies W1, N1, N5 and SE1 all support the SA Objectives all support the SA Objective 2 (air pollution and reducing the need to travel), in this regard policy SE1 was particularly strongly positive (see the section on communities below).
- 5.5 The policies all broadly contribute positively to SA Objective 3 (conservation of landscape, townscape and seascape)
- 5.6 Board support is also noted for Objectives 6 (adapting to climate change), 10 (cultural distinctiveness) and 14 (biodiversity). Objective 14 in particular shows positive effects from 11 out of the 16 policies.
- 5.7 Policies H1, H2, N1, N2, N3, SE1 provide support to Local Development Plan 2 policies.

Conservation

- 5.8 Policies L1 to L3, and E1 and E2 contribute positively to the SA Objectives on landscape/seascape/townscape and biodiversity, the two objectives that encompass many of the special qualities of the National Park and the first purpose of National Parks. Policies E1 and E2 are assessed to be particularly positive for biodiversity (SA Objective 14), directly addressing the SA Objective in regard of terrestrial and marine biodiversity respectively. Whilst Policies L1 and E2 most effectively addressed the aspirations of SA Objective 3 (landscapes, townscapes and seascapes)

5.9 It was concluded Policy E1 directly addresses the aspirations of SA Objective 14 (Maintain and enhance biodiversity within and outside designated sites). There are likely to be benefits to the SA Objectives on landscape, climate change and the water environment. In addition, the policy would also contribute to SA Objective 1 with regard to the rural economy through support of local produce.

5.10 Significant effects to SA Objective 6 (adapting to climate change) are also noted from policies E1 and E2.

Connection

5.11 Policy H1 performs well in respect of the SA Objective on culture but also in respect of the landscape and biodiversity due to its regard to historic landscape features, which are important features of the National Park that also help to maintain ecological connectivity.

5.12 Policy H2 focuses on the connection between the Welsh language, culture and the landscape.

5.13 Policy H2 contributes positively to the SA Objectives on landscape and cultural diversity but also brings benefits to biodiversity through the connection between cultural diversity and the knowledge of biodiversity.

5.14 Policy W1 contributes very positively against the Sustainability framework by providing a holistic approach to the management of recreational activities in the National Park that both protects the National Parks special qualities and promotes enjoyment for all. The policy performs particularly well against the SA Objectives covering health and well-being and accessibility (Objectives 4 and 9 respectively).

5.15 The Sustainability Appraisal concluded that, on the whole, Policy W2 contributed positively to the relevant SA Objectives with the most positive effects around health and social inclusion.

Climate and Natural capital

5.16 Policies N1 and N2 cover the issues of reducing carbon emissions and adapting to climate change and as a result directly address the aspirations of SA Objectives 6 (adapting to climate change) and 7 (mitigating and reducing the factors contributing to climate change). There is also likely to be some economic benefits from these policies where they support sustainable farming and allow for communities to adapt to climate change.

5.17 Under this group of policies is policy N3: Conserve and enhance soils and natural carbon storage. This policy supports the SA Objectives concerning climate change but also provides wider economic benefit with regard to maintaining viable agricultural and forestry sectors (SA Objective 1).

5.18 Policies N4 and N5 improve water and air quality respectively, with a focus alignment with existing strategies. They perform well against the relevant SA Objectives.

Communities

5.19 Policy SE1: Foster socio-economic wellbeing of National Park communities performed very well across a range of objectives with significant positive effects predicted for SA Objectives 3 (Landscapes, seascapes), 8 (sustaining communities), 10 (cultural distinctiveness) and 13 (community facilities). The Policy encompasses an approach to sustainable communities and economy in the National Park.

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Assessing the cumulative impacts of Management Plan policies

5.20 It is a requirement of Sustainability Appraisal and the Strategic Environmental Assessment Directive that the impacts of Plan policies are assessed in combination with other policies (as opposed to in isolation). These combination effects are of two types:

- cumulative effects - effects that arise due to the addition of the effects of a number of objectives.
- Synergistic effects - those that arise from an interaction of the effects of objectives and can be thought of as effects that are greater than the sum of the parts.

5.21 In some cases an in combination assessment is implicit in the assessment of individual policies, for instance, the policy landscape and seascapes is considered in the context of the policies on biodiversity. Assessing the combined impact of every combination of policies is not a practical option.

5.22 In order to get a better idea of the cumulative impact of Management Plan policies on each of the Sustainability Objectives the summary assessment of each policy against each Sustainability Objective was brought into the table below. From this it is possible to read the impact of the Plan as a whole on each Sustainability Objective. A predominance of negative assessments against a Sustainability Objective would suggest that the plan as a whole will have a negative impact on that objective. This approach is not without its flaws, the main one is the implication that a negative effect from one policy can be offset by a positive effect from another. This may be the case, the positive effect could mitigate against the negative effect, or result in gains that more than make up for the losses due to the negative effect. However, it could also be the case that a serious negative effect of one policy will not be offset by the positive effects of others. For this reason, a commentary follows the table indicating whether or not the positive effects are likely to offset negative effects where these are foreseen.

Sustainability Appraisal key:

++	There is a generally consistent strong positive association between the policy option and the Sustainability Objectives.
+	There is a weak or inconsistent, but generally positive association between the policy option and the Sustainability Objectives.
0	There is not a significant association between the policy option and the Sustainability Objectives, or the association is neutral (the combination +/- is used where it is believed a policy will have both positive and negative effects with regard to a particular Sustainability Objective).
-	There is a weak or inconsistent, but generally negative association between the policy option and the Sustainability Objectives.
--	There is a generally consistent strong negative association between the policy option and the Sustainability Objectives.
?	The association between the policy option and the Sustainability Objectives is uncertain, may be used in association with other symbols to indicate a degree of uncertainty in the conclusion

Sustainability Objective /Policy	L1	E1	E2	L2	L3	L4	H1	H2	W1	W2	N1	N2	N3	N4	N5	SE1
1. Economically viable agriculture and forestry sectors ...	0	++	0	0	+	0	0	0	0	0	+	0	+	0	+?	+
2. Minimise the demand for travel...and... encourage use of alternatives.	0	0	0	0	0	0	0	0	+	0	+	0	0	0	+	++
3. Conserve and enhance landscapes, townscapes and seascapes...	++	++	+	+	+	+	++	+	+	+	0	?	+	0	0	0
4. Sustainably increase the numbers ... taking part in physical forms of recreation...	0/+	0	+	0	0	0	0	0	++	++	+	0	0	+	0	+
5. Increase the number of visitors using the National Park outside the peak visitor season.	0	+	0	+	0	0	+	+	0	0	0	0	0	0	0	0
6. Manage the effects of and adapt to climate change...	+	++	++	0	+	0	+	0	0	0	0	++	+	+	0	0

Sustainability Objective /Policy	L1	E1	E2	L2	L3	L4	H1	H2	W1	W2	N1	N2	N3	N4	N5	SE1
7. Mitigate and reduce factors contributing to climate change.	0	++	+	0	+	0	0	0	0	0	++	0	+	0	0	+
8. Maximise the contribution of... development to sustaining local communities.	0	0	+	0	0	0	0	0	0	0	+	+	0	0	0	++
9. Encourage and facilitate access for all to the National Park...	0	0	0	0	0	0	0	0	++	+	+	0	0	0	0	+
10. Maintain the cultural distinctiveness of communities.	+	+	+	0	+	0	++	++	0	0	0	+	0	0	0	++
11. The adverse effects of minerals exploitation in the National Park decline...	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12. Reduce the negative impacts of waste.	+	0	+	0	0	0	0	0	+	0	+	0	0	0	0	0
13. Community facilities ... meet the needs of the National Park	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	++

Sustainability Objective /Policy	L1	E1	E2	L2	L3	L4	H1	H2	W1	W2	N1	N2	N3	N4	N5	SE1
population																
14. Maintain and enhance biodiversity...	+	++	++	+	+	+	+	+	0	0	0	0	++	+	+	0
15. Promote sustainable use of ... inland and coastal waters.	+	+	+	0	0	0	0	0	+	0	+	0	+	++	0	0

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- 5.23 No negative cumulative or synergistic impacts to the SA Objectives are predicted to arise as a result of the policy framework set out by the National Park Management Plan.
- 5.24 SA Objectives 3 (concerning landscape) and 14 (concerning biodiversity) show the highest cumulative positive effects. The National Park Management Plan policies showed the greatest coverage of against these objectives. This is not unexpected since these two SA Objectives broadly concern the special qualities of the National Park.
- 5.25 Also of note are the cumulative effects against SA Objectives 6 (regarding adaptation to climate change) and SA Objective 10 (regarding cultural distinctiveness). These topic areas showed strong coverage in this iteration of the National Park Management plan.

6.0 Monitoring

- 6.1 It is a requirement of the Sustainability Appraisal process and the Strategic Environmental Assessment directive that the significant sustainability effects of implementing the Plan are monitored. This sustainability monitoring in turn forms part of the monitoring framework for the Plans.
- 6.2 The Monitoring of the Sustainability Appraisal will take place alongside the monitoring of the National Park Management Plan.
- 6.3 The monitoring of framework for the Sustainability Appraisal of the National Park Management Plan is based on the Sustainability Appraisal Objectives against which the Plan has been assessed. This approach will help to understand to what extent these objectives are being achieved. The table below provides Sustainability Appraisal Objectives alongside some potential indicators.

Objectives	Potential indicators
Economically viable agriculture and forestry sectors play a key role in managing, conserving and enhancing natural resources, landscape, biodiversity including habitats, ecological resilience, nature based solutions that reduces flood risk and community well-being.	Employment rates in the agriculture; forestry and fishing sector Number of farms in agri-environment schemes (including those in the Authority's management agreements) Conservation status of farmland habitats
Minimise the demand for travel, especially by private car, reduce the impacts of road transport, and enhance opportunities and encourage use of alternatives.	Department for Transport statistics for car use by local authority DECC emission rates for cars by local authority Pembrokeshire County Council public transport figures
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	Mapped landscape quality indicators Condition of listed buildings and Scheduled Ancient Monuments Amount of greenfield and open space lost to development (ha) which is not allocated in

Objectives	Potential indicators
	the plan.
Sustainably increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities, balanced against environmental limits.	The activities undertaken by visitors revealed by tourism surveys. Creation or improvement of new cycling and walking opportunities. PCNPA volunteer numbers.
Increase the number of visitors using the National Park outside the peak visitor season.	Information from businesses PCNPA car park surveys/ ticket data Number of cultural and astro tourism events that occur out of season.
Manage the effects of and adapt to climate change with particular reference to the risk of flooding, coastal erosion and coastal squeeze which could negatively impact on existing habitats and biodiversity, infrastructure including the National trail and community, social, economic and well-being including public health.	Frequency / severity of flood events.
Mitigate and reduce factors contributing to climate change by reducing greenhouse gas emissions from transport and energy use.	Modelled emissions of greenhouse gases Indicators relating to car travel Renewable energy development
Maximise the contribution of the limited opportunities for development to sustaining local communities.	Refer to Local Development Plan 2 (annual monitoring report) Prevalence of new developments becoming second homes and holiday lets in National Park centres
Encourage and facilitate access for all to the National Park, reflecting the social mix of society.	The social mix of visitors revealed by tourism surveys.
Maintain the cultural distinctiveness of communities.	Use of Welsh language Condition of listed buildings Prevalence of second homes and holiday lets in National Park centres
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.	Number of new/ extensions to minerals sites Number of minerals sites closing/ reducing activity Nature of after-use on closed sites
Reduce the negative impacts of waste.	Waste and recycling rates for Pembrokeshire. Incidence of fly tipping
Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	Refer to Local Development Plan 2 (annual monitoring report)
Maintain and enhance biodiversity, ecological resilience, habitats and habitat connectivity both within and outside	Conservation status of protected sites, and key habitats and species (likely to be largely qualitative).

Objectives	Potential indicators
designated sites	
Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	<p>Natural Resources Wales river and coastal water quality measurements.</p> <p>Performance against Water Framework Directive objectives for the surface, ground and coastal waters in or downstream of the National Park.</p>

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