

Pembrokeshire Coast National Park

Replacement Local Development Plan
(2015-2031)

Sustainability Appraisal (incorporating
Strategic Environmental Assessment)

Scoping Report

June 2016

PEMBROKESHIRE COAST
NATIONAL PARK AUTHORITY

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Preface

This scoping report forms part of Pembrokeshire Coast National Park Authority's statutory duty to carry out Sustainability Appraisal incorporating the requirements of Strategic Environmental Assessment of its Local Development Plan.

Pembrokeshire Coast National Park Authority is now beginning its first Local Development Plan Review with the view to producing a replacement Local Development Plan. This involves a comprehensive review of the strategy, policies and proposals of the adopted Local Development Plan to reflect the changes to the National Park's situation (social, environmental and economic), the findings of the Local Development Plan Annual Monitoring over the last five years and any changes to the landscape of the national policy approach.

As a replacement plan is being prepared all stages of Sustainability Appraisal will be observed. The Sustainability Appraisal work carried out for the Adopted Local Development Plan will be a material consideration when carrying out further appraisal for consistency, and to capture changes between the Adopted and Replacement Plans.

Section 1.0: Introduction

Sustainability Appraisal and Strategic Environmental Assessment

1.1 Sustainability Appraisal is a statutory requirement for Local Development Plans under Section 62(6) of the Planning and Compulsory Purchase Act 2004. The purpose of Sustainability Appraisal is to assess the social and economic effects of the component policies, proposals and strategy elements of the Local Development Plan to ensure that decisions accord with the principles of sustainable development.

1.2 The Welsh Government define 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).

1.3 Guidance¹ provided by the Welsh Government on the Preparation of Local Development Plans indicates that a Sustainability Appraisal must integrate the requirements of the Strategic Environmental Assessment Regulations. 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; this includes Local Development Plans.

1.4 Sustainability Appraisal is an iterative process; this means that assessment will be carried out at the earliest opportunity on emerging strategy and policy to ensure that the development of the replacement Local Development Plan is informed by the process throughout. The Local Development Plan Manual (Second Edition, 2015) states that *“Sustainability appraisal and Strategic Environmental Assessment will play an important part in demonstrating that the LDP is sound by ensuring that it reflects sustainable development objectives. It will contribute to the reasoned justification of policies”*².

Process

1.5 Components of the Sustainability Appraisal:

The stages to Sustainability Appraisal of Local Development Plans are as follows:

- Scoping - setting the context and objectives, establishing the baseline and deciding on the scope;
- Assess Local Development Plan strategic options against the Sustainability Objectives and produce Sustainability Appraisal Report ;

¹Para 3.2.1, page 19, Local Development Plan Manual Edition 2 (Welsh Government, 2015)

² Para 3.1.1, page 19, Local Development Plan Manual Edition 2 (Welsh Government, 2015)

- Assess Local Development Plan policies against the Sustainability Objectives and produce Sustainability Appraisal Report;
 - Produce a Sustainability Statement stating how the findings of the Sustainability Appraisal has 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 Local Development Plan; baseline information describing the current conditions in the National Park; it identifies sustainability issues facing the Park and its people and establishes a Sustainability Assessment Framework - a set of objectives against which the sustainability of the Local Development Plan proposals and policies can be judged.
- 1.7 The consultees and consultation process for the Sustainability Appraisal are set out in the Delivery Agreement.
- 1.8 A full timetable for the Local Development Plan Review process can be found in the Delivery Agreement.

Habitats Regulations Assessment

- 1.9 Habitats Regulations Assessment is a requirement of the Habitats Directive (92/43/EEC) as set out by the Conservation of Habitats and Species Regulations 2010. The purpose of the Habitats Regulations Assessment in this context is to determine if there are any significant effects arising from the proposed policies on any of the 18 Natura 2000 sites within the National Park.
- 1.10 The Habitats Regulations Assessment for the Local Development Plan Review will be presented in a separate document.

Welsh Language

- 1.11 The Welsh Language (Wales) Measure 2011 established a legal framework to impose a duty on some organisations to comply with one or more standards of conduct on their delivery of services through the Welsh language, including, areas such as policy making, the operational activities of the organisation and promoting the Welsh language. Section 26 of the Measure allowed the Welsh Ministers to specify such standards, and these have been set out under The Welsh Language Standards Regulations (No.1) 2015. These Regulations only apply to National Park Authorities, County and County Borough Councils and the Welsh Ministers. Once published, the Welsh Language Commissioner, under Section 44 of the Measure, issued a Compliance Notice on the 30th September 2015 to all relevant organisations, which set out the standards with which they should comply.
- 1.12 In terms of policy making the 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.

The policy decision should also ensure that it does not treat the Welsh language less favourably than the English language.

- 1.13 Planning Policy Wales (paragraph 4.13.2, Edition 8, January 16th 2016) also states that “*Local planning authorities must consider the likely effects of their development plans on the use of the Welsh language in the Sustainability Appraisal of their plans...*” and that “*All local planning authorities should include in the reasoned justifications to their development plans a statement on how they have taken the needs and interests of the Welsh language into account in plan preparation, and how any policies relating to the Welsh language interact with other plan policies*”.
- 1.14 Technical Advice Note (TAN) 20: Planning and the Welsh Language (2013) – Local Development Plans provides the framework for the development of Local Development Plan policies to protect Welsh speaking communities and specifies that Sustainability Appraisal is the mechanism by which to assess impacts to Welsh language, where Welsh language is identified as a priority by the local Single Integrated Plan.
- 1.15 Draft amendments to Technical Advice Note 20 are currently out for consultation by the Welsh Government, these changes are as a result of provisions brought forward by the Planning (Wales) Act 2015.

The main proposed changes are related to:

- The link between planning for the Welsh language through land-use planning and community planning;
- Providing clarification that decision makers may take the language into account where it is material to the application; and
- Allow language impact assessments in certain specified circumstances

In terms of Sustainability Appraisal, the requirement to assess impacts to Welsh language is no longer triggered by the Single Integrated Plan and is a mandatory requirement for the process. The draft Technical Advice Note also highlights the need for robust evidence for Welsh language to inform the Sustainability Appraisal of the Local Development Plan.

- 1.16 The Sustainability Appraisal framework contains a specific objective/assessment criterion for the Welsh Language. The Sustainability Appraisal process also requires that the cumulative effects of the policies and strategy of the Local Development Plan be examined.

Other assessment processes

- 1.17 The Local Development Plan Manual Edition 2 indicates that “The proposed methodology for the remainder of the integrated appraisal including signposting where some issues and objectives may need deeper assessments such as race, equalities, Welsh language or health impact assessments”³. The Strategic Environmental Assessment of the Local Development Plan Review will specifically consider public health issues as part of its requirements. However, if it is found that certain issues arising require more in depth assessment a Health Impact Assessment may be carried out as a separate process.

³ Para 5.5.2.1, page 56, Local Development Plan Manual Edition 2 (Welsh Government, 2015)

- 1.18 The replacement Local Development Plan will be subject to an Equalities Impact Assessment as required by the Equalities Act 2010 to ensure that individuals with protected characteristics do not suffer negative discrimination as a result of the plan strategy, policies or proposals.
- 1.19 The Equalities Impact Assessment 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 replacement Local Development 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.

Proponent	Title	Year
UN Department of Economic and Social Affairs	Agenda 21	1992
UNEP	Rio Declaration on Environment and Development	1992
United Nations	Report of the World Summit on Sustainable Development	2002
United Nations	United Nations Framework Convention on Climate Change	1994
United Nations	The Kyoto Protocol	1997
UNEP	Convention on Migratory Species	1979
UNEP	Convention on Biological Diversity	1992
UNESCO	The Ramsar Convention on Wetlands	1971
United Nations Economic Commission for Europe	Aarhus Convention	1998
The Council of the European Communities	EU Directive 79/409/EEC (the Wild Birds Directive)	1979
The Council of the European Communities	EU Directive 85/337/EEC (the EIA Directive)	1985
The Council of the European Communities	EU Directive 91/676/EEC (the Nitrates Directive)	1991
The Council of the European Communities	EU Directive 92/43/CEE (the Habitats Directive)	1992
The Council of the European Communities	EU Directive 96/62/EC (the Air Quality Framework Directive)	1996
The Council of the European Communities	EU Directive 1999/31/EC (the Landfill Directive)	1999
The Council of the European Communities	EU Directive 2000/60/EC (the Water Framework Directive)	2000
The European Parliament and the Council of the European Union	EU Directive 2002/49/EC (Directive on Environmental Noise)	2002
The European Parliament and the Council of the European Union	EU Directive 2003/35/EC (Directive providing for Public Participation)	2003
The European Parliament and the Council of the European Union	EU Directive 2004/35/CE (the Environmental Liability Directive)	2004
The European	EU Directive 2006/12/EC (the Waste Directive)	2006

Proponent	Title	Year
Parliament and the Council of the European Union		
European Commission	Common Agricultural Policy	1958
European Commission	Common Agricultural Policy Reform	2003
European Commission	EU Rural Development Policy 2007-2013	2006
Council of Europe	European Landscape Convention	2000
Council of Europe	Convention on the Conservation of European Wildlife and Natural Habitats	1979
European Commission	MANAGING NATURA 2000 SITES The provisions of Article 6 of the 'Habitats' Directive 92/43/CEE	2000
European Commission	European Climate Change Programme	2000
UK Parliament	Countryside and Rights of Way Act	2000
UK Parliament	Environment Act 1995	1995
UK Parliament	Natural Environment and Rural Communities Act 2006	2006
UK Parliament	Ancient Monuments & Archaeological Areas Act 1979	1979
UK Parliament	Wildlife and Countryside Act 1981 (as amended)	1981
UK Parliament	The Conservation of Habitats and Species Regulations (England and Wales) 2010	2010
UK Biodiversity Partnership and the UK Government	The UK Post-2010 Biodiversity Framework	2012
UK Government	Securing the Future - UK Government sustainable development strategy	2005
DEFRA	The Air Quality Strategy for England, Scotland, Wales and Northern Ireland	2000
EA; RTPI; WLGA; LGA	The Water Framework Directive and Planning – Initial Advice to Planning Authorities in England and Wales	2006
Natural Resources Wales (Environment Agency)	Water for People and the Environment: water resources strategy for England and Wales Environment Agency 2009	2009
DEFRA	The UK Climate Change Programme	2006
DTI	Our energy future - creating a low carbon economy	2003
HM Treasury	Stern Review on the economics of climate change	2006
UK Parliament	Water and Flood Management Act 2010	2010
Welsh Government	Well-being of Future Generations (Wales) Act 2015	2015
Welsh Government	Planning (Wales) Act 2015	2015
Welsh Government	Environment (Wales) Act 2015	2015
Welsh Government	Historic Environment (Wales) Bill 2016	2016
Welsh Government	Planning Policy Wales	2015
Welsh Government	Technical Advice Note 2: Planning and Affordable Housing	2006
Welsh Government	Technical Advice Note 4: Retailing and Town Centres	1996
Welsh Government	Technical Advice Note 5: Nature Conservation and Planning	2009
Welsh Government	Technical Advice Note 6: Agricultural and Rural Development	2010

Proponent	Title	Year
Welsh Government	Technical Advice Note 7: Outdoor Advertisement Control	1996
Welsh Government	Technical Advice Note 8: Renewable Energy	2005
Welsh Government	Technical Advice Note 11: Noise	1997
Welsh Government	Technical Advice Note 12: Design	2014
Welsh Government	Technical Advice Note 13: Tourism	1997
Welsh Government	Technical Advice Note 14: Coastal Planning	1998
Welsh Government	Technical Advice Note 15: Development and Flood Risk	2004
Welsh Government	Technical Advice Note 16: Sport and Recreation	2009
Welsh Government	Technical Advice Note 18: Transport	2007
Welsh Government	Technical Advice Note 19: Telecommunications	2002
Welsh Government	Technical Advice Note 20: The Welsh Language – Local Development Plans	2013
Welsh Government	Draft Technical Advice Note 20: Draft Technical Advice Note 20 : Planning the Welsh Language (January 2016)	2016
Welsh Government	Technical Advice Note 21: Waste	2014
Welsh Government	Technical Advice Note 22: Sustainable Buildings	2011
Welsh Government	Minerals Technical Advice Note (Wales) 1: Aggregates	2004
Welsh Government	Minerals Technical Advice Note 2: Coal	2009
Welsh Government	Wales Spatial Plan	2004
Welsh Government	Wales Spatial Plan	2004
Welsh Government	Wales: A Better Country	2003
Welsh Government	Wales: A Vibrant Economy. The Welsh Assembly Government's Strategic Framework for Economic Development	2005
Welsh Government	Economic renewal: a new direction	2010
Welsh Government	Partnership for Growth: Strategy for Tourism 2013-2020	2013
Welsh Government	Welsh Language (Wales) Measure 2011 and The Welsh Language Standards Regulations (No.1) 2015	
Welsh Government	Welsh Coastal Tourism Strategy	2008
Wales Tourist Board	Sports tourism in Wales: a framework for action	
Welsh Government	Climbing Higher. The Welsh Assembly Government Strategy for Sport & Physical Activity Welsh Government 2005/ Climbing Higher Next Steps, Welsh Assembly Government 2006	2005/2006
Welsh Government	Communities First Guidance	2002
Welsh Government	Making the most of Wales' Coast - the Welsh Integrated Coastal Zone Management Strategy	2007
Welsh Government	Environment Strategy for Wales	2006
Welsh Government	Water Strategy for Wales	2015
Welsh Government	One Wales: Connecting the Nation. The Wales Transport Strategy	2008
Welsh Government	Wales: National Transport Strategy	2010
Welsh Government	Towards Zero Waste – Waste Strategy for Wales	2010
Welsh Government	One Wales: One Planet, a new Sustainable Development Scheme for Wales	2009
Welsh Government	Beyond Boundaries - Review of Local Service Delivery (Beecham Review)	2006
Natural Resources Wales	Glas Tir	2012
Welsh Government /	Register of Landscapes, Parks and Gardens of	

Proponent	Title	Year
Natural Resources Wales / CADW	Special Historic Interest in Wales	
Welsh Government/ Natural Resources Wales	Section 42 list: Habitats and species of principal importance for conservation in Wales	2007
Welsh Government	National Housing Strategy – 'Improving Lives and Communities – Homes in Wales'	2010
Welsh Government	Homes of Wales – A White Paper for Better Lives and Communities	2012
Welsh Government	Rural Development Plan 2014-2020: Next Steps	2012
Ceredigion County Council	Ceredigion Local Development Plan	2011
Carmarthenshire County Council	Carmarthenshire Local Development Plan	2011
Natural Resources Wales	Teifi CAMS inc. 2008 update.	2008
Natural Resources Wales	Tywi, Taff and Gwendraeth CAMS inc. 2010 update	2010
Pembrokeshire County Council	Pembrokeshire County Council Local Development Plan	2011
Pembrokeshire County Council	Pembrokeshire & Carmarthen Bay Shoreline Management Plans	
Pembrokeshire County Council/ Local Service Board	Pembrokeshire Single Integrated Plan 2013 - 2018	2013
Pembrokeshire County Council	Rights of Way Improvement Plan (ROWIP) for Pembrokeshire 2007 - 2017	2007
Milford Haven Port Authority	Milford Haven Waterway Recreation Plan	2011
Pembrokeshire Biodiversity Partnership	A Local Biodiversity Action Plan for Pembrokeshire	
Greenways Partnership	Pembrokeshire Greenways Strategy	
Natural Resources Wales	Pembrokeshire and Ceredigion Rivers Catchment Flood Management Plan	2009
Natural Resources Wales	River Basin Management Plan Western Wales River Basin District	2015
Natural Resources Wales	Cleddau and Pembrokeshire Coastal Rivers Catchment Abstraction Management Strategy (CAMS)	2009

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 and 2011 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.

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 Local Development Plan;
- The baseline information gathered;
- The experience of officers in the National Park Authority of issues faced when working on behalf of the Authority;
- The Monitoring of the Local Development Plan and Sustainability Appraisal over the last 5 years.

4.2 The issues identified through the above process are summarised in the table below. Many of the issues are the same as those identified during the preparation of the adopted Local Development Plan but have been checked and updated with current data where it has become available. No new issues have been identified through the monitoring process; copies of the Local Development Plan Annual Monitoring Report are available from Pembrokeshire Coast National Park Authority's [website](#)⁴.

Number	Issue	Description
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 report Wales: Changing Climate, Challenging Choices prepared for the National Assembly for Wales, predicts for 2080 average temperature increases for Wales of up to 2.9°C; an increase in annual precipitation of up to 9%; and a rise in sea level of up to 79cm, accompanied by more frequent and violent storms. Climate change is likely to impact on economic activity (e.g. changes to farming, impact on coastal activity), biodiversity (e.g. movement of species & habitats), health (e.g. heat stress, disease) and the historic environment (e.g. flooding and storm damage).
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

⁴ Local Development Plan Annual Monitoring Report:
<http://www.pembrokeshirecoast.org.uk/default.asp?PID=536>

Number	Issue	Description
		<p>recognised that the tourism industry can also contribute positively to both the environment and resident population.</p> <p>While the impact of tourist and recreational users is not as great in the Pembrokeshire Coast National Park as in some other National Parks, there are times and places at which the large amounts of tourism activity are a problem. The South West Wales Coastal Recreation Audit (2004) identifies 24 hotspots (sites where very high numbers of people present; and/or there are negative impacts on nature conservation designations; and/or there is conflict between different groups of users) in the National Park.</p>
3	Limited landscape capacity to accommodate development	Both Mr P.J. MacDonald in his Inspector's Report on the Pembrokeshire Coast National Park Local Plan (paragraph 4.14) and Mr J.R. Collyer in his Inspector's Report on the Joint Unitary Development Plan for Pembrokeshire (paragraph 4.8.1) highlight the limited capacity of the National Park landscape to accommodate new development, the special status of the National Park, and the importance and appropriateness of policies to restrict development in the National Park. This limited capacity for development is likely to constrain the options available to meet other sustainability objectives and objectives for the Local Development Plan.
4	Dependence on private cars	<p>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.</p> <p>Responses to the 2011/12 Pembrokeshire Visitor Survey indicate that around 98% of Pembrokeshire's visitors travel by private car. 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.</p>
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 good, 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 the Environment Agency under the Water Framework Directive. Fly tipping, and roadside and seaborne litter are the most significant waste issues for the National Park.
6	Reconciling energy development with landscape	The Milford Haven waterway has an established energy industry, with further developments under construction or planned. Though mostly outside the

Number	Issue	Description
	considerations	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.
7	Role of agriculture (and other land based businesses)	<p>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 and archaeological sites. 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.</p> <p>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. A review of NVZ designations in Wales is currently underway. It is understood that the inner Milford Haven meets the criteria for designation as an NVZ; if designated, restrictions would be placed on farmers on the amount of slurry/fertiliser that can be used on their land. Early indications suggest that one of the effects of the impending introduction of Nitrate Vulnerable Zones is an increase in the number of nutrient lagoons and anaerobic digesters along with an increase in farming intensification such as the construction of "super dairies". A proposal for an NVZ for the inner Milford Haven would likely exclude areas of the National Park. There is some concern that this may lead to farms exporting their slurry out of the Nitrate Vulnerable Zones and into the National Park.</p>
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
9	The use of the marine	Coastal wildlife, coastal scenery and clean seas are

Number	Issue	Description
	environment	<p>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.</p> <p>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.</p>
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.
11	Important archaeological & historic resources	The National Park has 285 Scheduled Monuments, and over 7500 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 14 Historic Parks & Gardens in the National Park.
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.
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).
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.' ⁵
15	Affordable Housing	House prices and rents in the National Park are

⁵ IUCN (1994) Guidelines for Protected Area Management Categories. Cambridge: IUCN

Number	Issue	Description
		significantly higher than the rest of Pembrokeshire, the lower quartile sale price for houses in the National Park in 2014 was over seven 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.
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 £18,000 per year in 2015, and over 25% of all workers earn less than £12,000 a year) and seasonal (winter benefit claimant rates are almost double those for summer).
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 (16.4% at the 2011 Census, -2.9% on the 2001 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.
18	Second and holiday homes	At the 2011 Census the National Park had one of the highest rates (27.7% ⁶) of second/holiday home use of its general housing stock in England and Wales. This is likely to impact negatively on the affordability of housing, and support for local facilities. Holiday homes also a significant element of the tourism economy of the National Park.
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.
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.
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

⁶ Based on Census 2011 "Households with no usual resident"

Number	Issue	Description
		encounters with nature National Parks support the good quality environments that are essential to maintaining clean air, water and land without which human health would suffer.
22	Cultural Distinctiveness	<p>The distinctiveness of the National Park's communities is threatened 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.</p> <p>The percentage of Welsh speakers in the Park increased between 1991 and 2001, but has since decreased between the 2001 and 2011 censuses. Whilst some communities within (or partially within) the National Park have experienced small increases in the number of Welsh speakers many have experienced decreases between 2001 and 2011. (See Local Development Plan Background Paper on Welsh Language for a full community by community breakdown).</p> <p>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.</p>
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 December 2013 there are currently 5 active quarry sites in Pembrokeshire Coast National Park (see Page C91 of Appendix B "Baseline information").
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 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 Local Development Plan.
- 5.2 The table 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.

Objectives:

Number	Cluster of related issues	Sustainability Objective
1	5. Agriculture and forestry are sources of (particularly water) pollution. 7. The core issue forming this objective (i.e. the role of agriculture and other land based activity) 11. The role of farming in protecting archaeological sites. 12. Conservation of biodiversity within and outside designated areas is dependent on appropriate activity on farmed or forested land, and land controlled by farmers and foresters. 14. Farming and forestry are the dominant land uses in the National Park 16. A successful agricultural and forestry sector can provide and maintain quality business and employment opportunities. 22. Outside settlements the distinctiveness of the people, landscape and built environment is largely the product of an agricultural society.	Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well-being.
2	2. The majority of visitors to the National Park travel by car and therefore car journeys represent a major impact of tourism. 4. Real or perceived dependence on private cars leads to more car journeys than might otherwise occur. 5. Car use is probably the main source of air pollution in the National Park 14. Roads and cars have significant negative landscape impacts. 17. Easy access to services (especially in more rural areas) often requires car use	Locate developments so as to minimise the demand for travel, especially by private car

Number	Cluster of related issues	Sustainability Objective
	21. If visitors and residents are not using their cars they may be using alternative forms of transport such as walking and cycling.	
3	<p>1. Climate change is likely to have significant effects on the landscape, some may be viewed as positive and others negative.</p> <p>3. The limited capacity of the National Park landscape to accommodate development means that inappropriate development would be likely to result in a degraded landscape.</p> <p>6. Energy developments on the Milford Haven waterway are a component of many of the landscapes in the National Park.</p> <p>8. Maintaining the historic built environment, and ensuring new building reflects the special qualities of the National Park, contributes to the quality of landscapes and townscapes.</p> <p>9. Activity in the marine environment impacts on the seascape, and coastal landscapes and townscapes</p> <p>11. The National Park's archaeological resources are key components of its landscape and special qualities.</p> <p>12. The National Park's biological resources are key components of its landscape and special qualities.</p> <p>13. The National Park's geological resources are key components of its landscape and special qualities.</p> <p>14. The core issue forming this objective (i.e. important landscape resources)</p> <p>19. Military use of land in the National Park has been instrumental in conserving National Park landscapes and is likely to continue to do so.</p> <p>22. The cultural distinctiveness of National Park communities in part manifests itself in the (mainly agricultural) patterns in the landscape and the built environment.</p> <p>23. Working quarries have significant landscape impact, though disused quarries may become landscape assets.</p> <p>24. Establishing awareness and appreciation of the Park's special qualities dependent on maintaining those qualities.</p>	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
4	<p>4. If residents and visitors become less dependent on cars they may walk or cycle instead.</p> <p>16. There are employment/business opportunities in the provision of recreation activity.</p> <p>21. Outdoor physical recreation leads to improved physical and mental health.</p>	Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.
5	<p>2. Problems associated with tourism activity are largely the result the intensity at peak times of the year.</p> <p>3. A more even spread of visitor numbers will allow the benefits of such tourism development that can be accommodated to be maximised.</p> <p>16. Much employment in the tourism sector appears</p>	Increase the number of visitors using the National Park outside the peak visitor season.

Number	Cluster of related issues	Sustainability Objective
	to be seasonal. 21. A continuous programme of physical recreation (i.e. throughout the year) will provide greater health benefits than such recreation only during the summer months.	
6	11. Archaeological and historic sites may be damaged as a result of climate change. 12. Biological systems are particularly vulnerable to changing climate. 13. Geological resources may be damaged or altered as a result of climate change or attempts to moderate its effects. 14. The landscape will change as a consequence of climate change.	Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.
7	1. As the National Park will be affected by climate change it is in the interests of the Park's communities and the NPA to address the causes. 2. Visitors mainly travel to and around the National Park by car, an important contributor of greenhouse gases. 4. Car use is an important contributor of greenhouse gases. 10. More efficient use of less energy will reduce the production of greenhouse gases from homes and businesses.	Reduce factors contributing to climate change.
8	3. There are limited opportunities for development arising out of the limited capacity of the landscape to accommodate it. 15. The issue of housing affordability is in large part the result of the inability of local people to compete financially for existing and new market housing. 16. Where opportunities exist for employment related development, the jobs created should be those that require and develop a highly skilled work force within the local population. 18. The large proportion of the housing stock in the National Park in use as second and holiday homes creates extra demand, driving up prices.	Maximise the contribution of opportunities for development to sustaining local communities.
9	20. Not all sectors of society are equally represented amongst users of the National Park. 21. Those sectors of society under-represented amongst National Park users are sometimes over represented in terms of health problems. 24. Awareness and appreciation of the special qualities of the National Park is already established amongst the sectors that well represented amongst Park visitors, it needs to be established amongst those groups are not currently well represented amongst Park visitors	Encourage access for all to the National Park, reflecting the social mix of society.
10	2. One impact of recreation and tourism is the number of second and holiday homes in the National Park 7. Farming represents a key component of the distinctiveness of many Park communities. 8. Cultural distinctiveness often manifests itself in	Maintain the cultural distinctiveness of communities.

Number	Cluster of related issues	Sustainability Objective
	<p>the built environment.</p> <p>14. The landscape in the National Park is in large part a product of the culture of the communities that created it.</p> <p>15. Lack of affordable housing in the National Park means that many young people from Park communities cannot continue to live in those communities.</p> <p>17. Should access to services become more difficult (and it is not clear if this is yet the case in the National Park) the sustainability of communities may be eroded.</p> <p>18. The percentage of homes used as second and holiday homes in some Park communities is likely to impact on the nature of those communities.</p> <p>19. Military activity represents a large influence on some parts of the Park. Though it could also be argued that there has been a military presence in the area of the National Park for so long that it has become part of the Park's culture.</p> <p>22. Cultural distinctiveness is part of the Park's special qualities.</p> <p>22. Welsh Language is an important part of the cultural distinctiveness of some communities in the National Park. The assessment of impacts to Welsh Language through policy and strategy making, and the allocation of land for development must be assessed as part of Sustainability Appraisal. Paragraphs 1.13-1.14 of this report outline the requirements for the assessment of impacts on Welsh language.</p> <p>24. It is important to establish awareness and appreciation of culture as well as landscape and wildlife.</p>	
11	<p>3. Like any other development there is a lack of capacity for new or expanded quarry sites.</p> <p>12. Disused quarry sites can become important wildlife sites (e.g. Bosherton quarry).</p> <p>13. Quarrying can reveal features of geological interest, but may also result in their destruction.</p> <p>14. Working quarries have significant landscape impact, though disused quarries may become landscape assets.</p> <p>23. The demand for minerals (largely from outside the National Park) drives demand for quarry development.</p>	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.
12	<p>5. One of the impacts of waste is on the physical environment in terms of effects on water and air quality, and by its physical presence.</p> <p>10. More efficient resource use and recycling can help reduce the amount of waste generated.</p>	Reduce the negative impacts of waste.

Number	Cluster of related issues	Sustainability Objective
	<p>12. Waste and litter can cause harm to wildlife.</p> <p>14. Waste as litter, fly-tipped, or properly run waste sites has a negative landscape impact.</p>	
13	<p>2. Tourism and recreation significantly increase the population of the National Park at certain times of the year.</p> <p>3. Providing community facilities, as for any other kind of development, is subject to the lack of landscape capacity for development.</p> <p>17. If services are to meet the needs of National Park communities they need to be accessible to those communities.</p> <p>18. A large percentage of second and holiday homes can reduce the population of communities to a point where the provision of certain services is no longer viable.</p> <p>22. Certain community facilities (e.g. pub, post office, community hall) can be important in maintaining the distinctiveness and cohesion of rural communities.</p>	<p>Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population</p>
14	<p>2. Disturbance to wildlife can be an impact of recreation and tourism.</p> <p>7. The state of biodiversity, within and outside designated sites, is highly dependent on the nature of agriculture.</p> <p>9. Much of the Park's biodiversity is either marine or coastal, or dependent on these environments.</p> <p>12. There are a large number of nationally and internationally important sites within the National Park.</p> <p>24. Biodiversity is an important element in the National Park's special qualities.</p>	<p>Maintain and enhance biodiversity both within and outside designated sites</p>
15	<p>1. Increased winter rainfall and decreased summer rainfall are likely to affect water quality and supply.</p> <p>2. The increased population during the peak tourism season results in increased demand for water and sewerage.</p> <p>5. Though water quality is currently good, inland and coastal waters face threats due to pollution.</p> <p>7. Agricultural practices can pose a threat to water quality.</p> <p>9. Certain uses of the marine environment carry a risk of pollution.</p> <p>10. Water is one resource that could be used more sustainably in domestic and commercial situations.</p> <p>12. Most biological systems and species are susceptible to unfavourable water levels and quality.</p> <p>14. Water features are an important landscape element in the National Park.</p> <p>20. Coastal and water related activities are important for recreation in the National Park.</p>	<p>Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.</p>

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*

In pursuing these purposes National Park authorities shall:

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

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

SA Objective \ Purpose/Duty	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
to conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park	✓	✓	✓	✓	-	✓	0	✓	-	✓	✓	✓	-	✓	✓
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	✓	✓	✓	0	✓	✓	✓	✓

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

5.6 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

- 5.7 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 Pembrokeshire Coast National Park Authority's replacement Local Development Plan has full regard for the Act and its goals. The Local Development Plan Manual Edition 2 also considers that a sound Local Development Plan must have regard for the Well-being goals⁷ of the Act.
- 5.8 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.

⁷ Local Development Plan Manual Edition 2, page 100, paragraph 8.2.1.2.

Compatibility with the Well-Being Goals

Compatibility Matrix:

✓	Compatible
×	Incompatible
0	Neutral
?	Uncertain

Well-Being of Future Generations Act – Goals	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.
SA Objectives							
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	✓

5.9 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 Local Development Plan review.

5.10 *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:

- 5.11 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.
- 5.12 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.

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

- 5.13 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**