

# **Pembrokeshire Coast National Park**

## **National Park Management Plan 2020-2024**

### **Sustainability Appraisal Report – Post Adoption Statement**

Pembrokeshire Coast National Park Authority

11<sup>th</sup> December 2019

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## **1.0 How environmental/sustainability considerations have been integrated into the Pembrokeshire Coast National Park – National Park Management Plan 2020 - 2024**

- 1.1 Sustainability Appraisal (incorporating Strategic Environmental Assessment) of the National Park Management Plan was undertaken for all stages of the development of the plan.
- 1.2 Assessment of the National Park Management Plan was undertaken iteratively, with assessments of the Plan's social, environmental and economic impacts being carried out at the earliest opportunity. During the preparation of the draft National Park Management Plan policies, each policy was drafted assessed and re-assessed over multiple iterations each informed by the Sustainability Appraisal before the policies were finalised. The Sustainability Appraisal report provides an audit trail of this process; the outcomes of this process are also included in information boxes underneath each of the policies in the plan itself.
- 1.3 The social, environmental and economic effects of the National Park Management Plan were assessed through the use of a framework of Sustainability Appraisal Objectives. The framework consists of 15 objectives that were used to judge if the plan would meet those objectives and what the likely effects on those objectives would be.
- 1.4 The Sustainability Appraisal Objectives for the National Park Management Plan were derived by the Authority for previous iterations of the Management Plan and updated for the Local Development Plan Review. There is necessarily a need to ensure a compatibility of approach between the two documents. These Objectives were originally presented in the Sustainability Appraisal Scoping Report of the Local Development Plan in June 2016, and then again for the National Park Management Plan January 2019. The Sustainability Appraisal Objectives are provided in Table 1 below. An additional column has been included to clearly show how the schedule 2 Strategic Environmental Assessment regulations topic areas are covered by the framework.
- 1.5 A shadow Habitats Regulations Assessment of the Consultation draft Management Plan was commissioned and its recommendations were taken into account in drafting the consultation draft Management Plan.

**Table 1. Sustainability Framework for Pembrokeshire Coast National Park Management Plan**

<b>Sustainability Appraisal Objective:</b>	<b>Strategic Environmental Assessment Directive issue</b>
Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well-being.	Biodiversity, Fauna, Flora, Soil, Water, Cultural heritage, Landscape.
Minimise the demand for travel, especially by private car, reduce the impacts of road transport, and enhance opportunities and encourage use of alternatives.	Population, Human health, Air, Climatic factors.
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	Material assets, Cultural heritage, Landscape.
Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	Human health
Increase the number of visitors using the National Park outside the peak visitor season.	
Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	Biodiversity, Population, Human health, Fauna, Flora, Climatic factors, Material assets.
Reduce factors contributing to climate change.	Air, Climatic factors.
Maximise the contribution of opportunities for	Population,

development to sustaining local communities.	Cultural heritage.
Encourage and facilitate access for all to the National Park, reflecting the social mix of society.	Human health.
Maintain the cultural distinctiveness of communities.	Population, Cultural heritage.
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.	Biodiversity, Fauna, Flora, Landscape.
Reduce the negative impacts of waste.	Human health, Water, Landscape.
Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population.	Population, Human health, Material assets.
Maintain and enhance biodiversity both within and outside designated sites.	Biodiversity, Fauna, Flora, Landscape.
Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	Population, Human health, Water, Material assets, Landscape.

## **2.0 How opinions of consultation bodies and the public have been taken into account**

- 2.1 Sustainability Appraisal reports have been issued at each stage of the National Park Management Plan development. These were published for consultation with the public and for consultation with the statutory consultation bodies referred to in the Strategic Environmental Assessment regulations. In Wales these are Natural Resources Wales and Cadw.
- 2.2 All of the responses received during these consultation periods are summarised below.

### **Sustainability Appraisal Scoping Report (January 2019 – April 2019)**

- 2.3 The Sustainability Appraisal Scoping Report was published for consultation with the public and the statutory consultation bodies between January and April of 2019.
- 2.4 Comments were sought on the appropriateness of the Sustainability Appraisal Objectives, the coverage of the issues, and the completeness of the review of relevant plans, policies and programmes and baseline information.
- 2.5 No substantive comments were received from the statutory consultees, and no other comments were received from the public or other organisations. However, some comments were made by the National Park Authority over the wording of one of the Sustainability Appraisal Objectives, to which an amendment was made.

### **Draft National Park Management Plan (August – October 2019)**

- 2.6 The Sustainability Appraisal Report underwent public consultation alongside the draft National Park Management Plan from the beginning of August 2019 until the end of October 2019. Comments were sought on the suitability of the Sustainability Appraisal Framework, the assessment methodology and the assessments made of the emerging National Park Management Plan policies.
- 2.7 No comments were received in relation to the Sustainability Appraisal, and no comments on any of the documents were deemed to have any implications for the Sustainability Appraisal.

## **Final National Park Management Plan (December 2019)**

2.8 The final National Park Management Plan 2020-2024 and accompanying assessments was considered by the National Park Authority on 11<sup>th</sup> December 2019.

### **3.0 Why the adopted National Park Management Plan was chosen**

- 3.1 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. National Park Management Plans Guidance (2007) advises at para 1.27 (page 4) that the Management Plan “is a plan for the geographic area of the Park and not for any one authority. As a strategic over-arching document it co-ordinates and integrates other plans, strategies and actions in the National Park, where these affect the park purposes and duty.”
- 3.2 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 of the Sustainability Appraisal report).
- 3.3 The process of Plan review, as agreed by the Authority, is set out in a final report of engagement and consultation (National Park Authority 11<sup>th</sup> December 2019).