

Report of the Strategic Policy Manager

Subject: Local Development Plan 2: Supplementary Planning Guidance (SPG) Consultations

Purpose of this Report

1. This report asks Members to consider responses received on consultations undertaken on draft Supplementary Planning Guidance. Members are asked to adopt new and updated Supplementary Planning Guidance (SPG) documents subject to amendments proposed in response to the consultation responses received.

Background

2. The guidance documents consulted upon are listed below. One is prepared jointly with the County Council.

Seascapes	Joint
Trees and Woodland	
Loss of Hotels & Guest Houses	

3. The joint guidance document covers the whole of Pembrokeshire. The rest just cover the Pembrokeshire Coast National Park. In October 2022 this Authority agreed to publish the Seascapes and Trees and Woodland draft Supplementary Planning Guidance documents for public consultation. Pembrokeshire County Council agreed the Seascapes Supplementary Planning Guidance for consultation in December 2022. Officers at the County Council intend to report back to Pembrokeshire County Council's Cabinet meeting on the 2nd October 2023.
4. The Loss of Hotels and Guest Houses guidance was approved for consultation in September 2021. There was a delay in reporting back to Members as further investigation was needed into the issues raised.

Officer Appraisal

5. A public consultation on the guidance started in February 2023 and ended on the 26th May 2023.¹ A formal notice was published in the Western Telegraph and Pembrokeshire Herald advertising the consultation and a press release advertising the consultation was also sent to local papers and radio outlets.

¹ The consultation exercise on the Loss of Hotels and Guesthouses guidance is set in my report to Members on the 26th October 2022 and is not repeated in this report.

[31_22-Report-of-Cons-SPG.pdf \(pembrokeshirecoast.wales\)](#)

Copies were made available on our websites. A reminder of the impending closing date for comments was placed in a press release in before the closing date.

6. A report summarising the results of the public consultation and identifying recommended changes to the Supplementary Planning Guidance is attached at Appendix A. A total of 14 responded, making 61 representations on the documents. Officers have accepted a late representation as there was sufficient time to deal with the issues raised prior to reporting to the National Park Authority meeting today. Appendix B provides the proposed edited pages of the consultation documents, using 'underlining' for inserts and 'strike throughs' for deletions. The original Seascapes and Trees and Woodlands guidance that were approved for consultation can be found in the link in the footnote²: The complete Loss of Hotels and Guest Houses Guidance with the edits is provided.
7. The main issues and changes identified to the Supplementary Planning Guidance following the public and internal consultations are:
 - a. The need to clarify the roles of Seascapes and Trees and Woodlands Guidance.
 - b. The clarification of terms used in the Loss of Hotels and Guest Houses Guidance.

Financial considerations

8. The Authority had a budget available to carry out this consultation. It is a requirement to complete a consultation for such documents so that they can be given weight in the Authority's planning decision making.

Risk considerations

9. The guidance when adopted will provide an updated position regarding planning requirements in line with the recently adopted Local Development Plan 2 and national planning policy.

Equality considerations

10. The Public Equality Duty requires the Authority to have due regard to the need to eliminate discrimination, promote equality of opportunity and foster good relation between different communities. This means that, in the formative stages of our policies, procedure, practice or guidelines, the Authority needs to take into account what impact its decisions will have on people who are protected under the Equality Act 2010 (people who share a protected characteristic of age, sex, race, disability, sexual orientation, gender reassignment, pregnancy and maternity, and religion or belief). Local Development Plan 2's policies have been subject to an Equalities Impact Assessment. The supplementary planning guidance is written to support these policies.

² <https://www.pembrokeshirecoast.wales/supplementary-guidance-for-consultation/>

Welsh Language considerations

11. The publication and consultation exercises are carried out in accordance with the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards Regulations (No.1) 2015.
12. Assessing impacts on the Welsh language is also an integral part of the Sustainability Appraisal process for Local Development Plan preparation.
13. The relevant policies that this guidance supports have been subject to appraisal.

RECOMMENDATION

That Members:

- 1. Agree the Officers' responses to the consultation responses received in Appendix A.**
- 2. Adopt Supplementary Planning Guidance on:**
 - a) Seascapes³ subject to the edits in Appendix B (prepared jointly with Pembrokeshire County Council)**
 - b) Trees and Woodlands⁴ subject to the edits in Appendix B**
 - c) Loss of Hotels and Guest Houses as set out in Appendix B.**
- 3. Provide delegated authority to the Strategic Policy Manager to make further minor edits to include taking account of Pembrokeshire County Council's consideration of the representations on the Joint Supplementary Planning Guidance on Seascapes. Any proposed changes by Pembrokeshire County Council which are substantive nature will be reported back to the National Park Authority for further consideration.**

Background papers:

[Local Development Plan 2 - Pembrokeshire Coast National Park development-plans-manual-edition-3-march-2020.pdf \(gov.wales\)](#)
[Planning Policy Wales, edition 11](#)

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

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³ <https://www.pembrokeshirecoast.wales/supplementary-guidance-for-consultation/>

⁴ <https://www.pembrokeshirecoast.wales/supplementary-guidance-for-consultation/>

Report of Consultations
APPENDIX A
Supplementary Planning Guidance

Rep No.	Reference	Representation	Officer Response and Recommendation
Loss of Hotels			
1.	3511/ Tenby Civic Society	<p>We have considered the proposed note and are supportive of its adoption.</p> <p>We would also comment that in the wake of the visitor economy of the last two main seasons and from economic forecasts of summers immediately ahead, the demand for hotels in Pembrokeshire, and Tenby in particular, is such that it would prove very difficult to justify any future loss of hotel accommodation. We are confident Visit Wales statistics will support our conclusions when their research findings are released.</p>	Support noted.
2.	4701/ Mr. G Angell Jones (Welsh Government Appointed Member of National Park Authority)	<p>Page 4: I wonder if the use of the terms 'marketing' and of 'sales' is confusing (One definition of marketing is the term of selling a mass produced and repeatable product. However, the disposing of a single hotel (or any single product) to a potential purchaser is 'selling').</p> <p>3.2a) suggest remove 'marketing' x2 and insert 'sales'.</p> <p>We should be mindful that a poorly performing hotel or one that is no longer trading, is only worth the building or the site on which it stands. There may be no value in the business itself.</p> <p>3.2b) line 1 – amend to 'selling agent'.</p> <p>3.2c) there seems to be a lack of guidance to explain what would constitute 'positive and appropriate action' or who would evaluate this.</p> <p>3.3 Might this require two reports since valuation of a business or a building and judging adequate marketing are two different areas of professional expertise?</p> <p>3.4 I really doubt if Visit Wales statistics can be used to establish an average peak occupancy of an establishment in our national Park. The statistics struggle to provide valid data on a regional (south west) basis because of the small sample size. Other factors such as the location and target market of each business is extremely relevant.</p> <p>Page 5: 3.6 Should we consider as valid when a Hotel or Guest House seeks to continue to offer accommodation as apartments, apart hotels or HMO while retaining its façade and character in the landscape or setting?</p>	<p>Agree that distinguishing the terms, as suggested would clarify their meanings.</p> <p>Propose that paragraph 3.2 a) is amended by changing the words 'marketing' to 'sales'.</p> <p>The comment regarding the valuation of a poorly performing or closed business is noted. Any valuation would need to be based on its worth in the market place and not on an individual business and therefore it is proposed to delete the words "as a going concern" from sentence 1 of paragraph 3.2 a) and that the second sentence of paragraph 3.2 a) is amended to read: <i>"The valuation should be based on the use of the property as a hotel or guesthouse operated by a competent, experienced and able operator,"</i></p> <p>It is proposed that paragraph 3.2b) is amended by changing the word 'marketing agent' to 'selling agent' and 'marketing period' to 'sales period'.</p> <p>It is proposed that an additional bullet point is added to paragraph 3.2 b) to read: <i>"Applications can also be supported by evidence to show what action has been taken to ensure the viability of the business."</i></p>

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			<p>3.2c) The criterion is asking applicants to demonstrate that they have undertaken promotion of their business. There are many ways to undertake such action. It is asking for historic actions taken and it will be for the applicant to provide details of how they market and promote their business. It is not asking for future action and therefore it would not be appropriate for the Authority to make suggestions as to how this is achieved. The criterion states that it will be assessed by the Authority. This will be in the context of considering any relevant planning application.</p> <p>3.3 It is proposed that paragraph 3.3 is amended to read: <i>“As a safeguard, the Authority may commission an independent valuation and/or sales report at our own cost to affirm that the property has been marketed on realistic terms.”</i></p> <p>3.4 It is acknowledged that the sample size of the Visit Wales data is small. Protracted effort has been made to find alternative sources of data which are regularly updated but none has been found. This may be a matter to revisit when the Local Development Plan is next reviewed. In the meantime, the Visit Wales data will need to be used to establish a general idea of supply and demand in the area, in conjunction with the other requirements of Policy 39 Loss of Hotels and Guest Houses of LDP2.</p> <p>The intention of the policies in LDP2 (policies 38 Visitor Economy and 39 Loss of Hotels and Guest Houses) is to protect against unnecessary loss of serviced accommodation which would not be fulfilled by apartments and houses of multiple occupation which are different use classes to hotels and guest houses. It is not about protecting just the bricks and mortar of a building but also the character, range and vitality of accommodation in the National Park. Apart-hotels may be considered through the context of the policy and applications for these will need to be judged on their individual merits.</p>
3.	3628/ Cllr Myles Pepper	Whilst not in the National Park does the lack of hotel beds and service	When considering applications proposing the loss of hotels and

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		accommodation in Fishguard and Goodwick need to be taken into consideration in the creation of the LDP 2 document? Indeed, in respect of PCC's LDP2, have we identified land suitable for a medium large such development in Fishguard and/or Goodwick?	guesthouses in the National Park, the availability of other premises nearby, whether in or outside of the National Park boundary would be taken into consideration in determining availability of bed spaces to meet peak demand. Any applications to develop new hotels within the National Park near to Fishguard/Goodwick would need to be considered on their merits and considered against the relevant policies of the National Park Authority Local Development Plan 2.
4.	4702/ Chris Osbourne	I am happy with the proposed guidance although you should change 'has' to 'have' in para 3.8.	Support noted. Although the word 'premises' is a plural noun it usually refers to one place. The term in paragraph 3.8 is referring to consideration of individual premises and therefore 'has' is the correct form of the verb in this instance.
5.	4597/ Dr. Rosetta Plummer (Welsh Government Appointed Member of National Park Authority)	Concerns about using Visit Wales data to establish peak occupancy due to the small sample size. Other sources should be sought. There is a need to distinguish between the two types of 'marketing' in the document.	It is acknowledged that the sample size of the Visit Wales data is small. Protracted effort has been made to find alternative sources of data which are regularly updated but none has been found. This may be a matter to revisit when the Local Development Plan is next revised. In the meantime the Visit Wales data will need to be used to establish a general overview of supply and demand in the area, in conjunction with the other requirements of Policy 39 Loss of Hotels and Guest Houses of LDP2. It is proposed that paragraph 3.2 b) is amended by changing the word 'marketing agent' to 'selling agent' and 'marketing period' to 'sales period'.
6.	4217/ G Fry	Introduction and Background I have been in tourism for over 60 years dating back to the 1960s. I have owned and run guest houses, chain of hotels, restaurants, pubs, entertainment centres, night clubs, fast food outlets and visitor attractions and more over the year. Assumption Everything and everybody must have an economic foundation and business acumen. Context Tourist in SouthWest Wales has been planned very badly, It has been interfered	The consultation relates to Supplementary Planning Guidance. The Supplementary Planning Guidance on Hotels and Guesthouses is intended to provide additional guidance to planning applicants on the type of information required to be submitted with their planning application. The representor appears to be seeking wholesale changes to tourism strategies for West Wales which is outside the scope of the Supplementary Planning Guidance. No further meaningful comment can be made.

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		<p>with by national Park, Pembrokeshire County Council, Wales Tourist Bord, Welsh Development Agency and many other organisations who wish to be involved. All of which have no working knowledge of the industry or economics or management skills. All this interference without a flexible blueprint is a recipe for disaster. HAVE WE ARRIVED THERE???????</p> <p>The National Park policies dating back to 1954 are now outdated together with no economic policy has resulted in the loss of hotels and guest houses and businesses.</p> <p>They just do not pay their way not enough income and costs are too high. There is also the problem with maintenance. It is not affordable.</p> <p>The answer lies in strategy creating an identity which can be marked which is recognised by the general public</p> <p>Identity For sustainable business Marketing</p> <p>Giving guests a product that they want. Developing an attraction which is holiday-based bringing guests to our geographical area to stay two or three nights or longer on a rolling basis (we do not want just weekends).</p> <p>This attraction should be based on the largest tourism community which is Tenby. The only issues are parking. We must introduce a traffic management scheme in each community to avoid driving customers away or precluding them coming to the area to visit. Advertise parking for everyone guaranteed.</p> <p>We need to take SouthWest Wales into the 2021 centre by crating an overall strategy to attract visitors all year round. Summer Winer Autumn and Spring.</p> <p>At present the regulation policing policy of the authority has driven markets downward in so doing loss of hotels and guest houses business.</p>	
Seascapes			
7.	4074/ P Niedziedzki	I am writing on behalf of Llanrhian Community Council with an observation on one of the Seascapes Supplementary Planning Guidance drafts.	Integrated Coastal Zone Management has been superseded

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		<p>The draft in question is Seascape Character Assessment 13: Penbwdy to Penllechwen. At page 13-4 this states that "the proposed ICZM may limit the recreational use of Abercastle Harbour". We are not aware that an "Integrated Coastal Zone Management" plan exists or is proposed for Abercastle Harbour. We suspect that this is an outdated reference, from a time when an ICZM might once have been considered. However, for the avoidance of doubt and reassurance of users of Abercastle Harbour, we believe that this reference should be deleted.</p> <p>Although SCA 13 is relevant to the Llanrhian CC area, Abercastle Harbour falls outside our boundary. It is possible that Mathry Community Council (in whose area it falls) may also wish to comment on the Abercastle reference if they have not already done so.</p>	<p>by the Welsh National Marine Plan, referenced in paragraph 1.8.</p> <p>The Welsh National Marine Plan has been developed in accordance with, and gives effect to, the principles of Integrated Coastal Zone Management (ICZM).</p> <p>It is proposed to delete the statement 'the proposed ICZM may limit the recreational use of Abercastle Harbour.' in SCA13. ✓</p>
8.	1638/ V Walker	<p>Mathry Community Council has discussed Seascape Character Assessment 13: Penbwdy to Penllechwen (page 13-4) which states that "the proposed ICZM may limit the recreational use of Abercastle Harbour", however it is not clear whether this "Integrated Coastal Zone Management" plan actually exists, or is proposed, for Abercastle.</p> <p>Could you please confirm the current situation with regard to the future recreational use of Abercastle Harbour.</p>	<p>Integrated Coastal Zone Management has been superseded by the Welsh National Marine Plan, referenced in paragraph 1.8.</p> <p>The Welsh National Marine Plan has been developed in accordance with, and gives effect to, the principles of Integrated Coastal Zone Management (ICZM).</p> <p>It is proposed to delete the statement 'the proposed ICZM may limit the recreational use of Abercastle Harbour'. in SCA13. ✓</p>
9.	3617/ Coal Authority	<p>The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, The Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.</p> <p>Our records indicate that within the Pembrokeshire area there are recorded coal mining features present at surface and shallow depth including; mine entries, shallow coal workings and reported surface hazards. These features may pose a potential risk to surface stability and public safety.</p> <p>The Coal Authority's records indicate that surface coal resource is present the area, although this should not be taken to imply that mineral extraction would be economically viable, technically feasible or</p>	<p>Comments noted.</p>

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		<p>environmentally acceptable. As you will be aware those authorities with responsibility for minerals planning and safeguarding will have identified where they consider minerals of national importance are present in your area and related policy considerations. As part of the planning process consideration should be given to such advice in respect of the indicated surface coal resource.</p> <p>It is noted that this current consultation relates to Guidance on Seascapes and I can confirm that the Planning team at the Coal Authority have no specific comments to make on this document.</p>	
10.	4716/ Bourne Leisure	<p>Objection Draft main SPG Document: para 1.1 Draft SCA Description Document: Aesthetic, perceptual, and experiential documents</p> <p>Response (Neutral Language) It is vital that the emerging SPG takes a neutral position so that it provides a robust evidence base for decision-making. The draft SPG currently includes language with negative connotations regarding development within the SCAs, and regarding tourism development in particular. For example, the draft SPG main document refers to pressures created by “inappropriate land use” at draft paragraph 1.1 without defining what this land use might entail.</p>	<p>Paragraph 1.1 of the draft Supplementary Planning Guidance refers to paragraph 6.5.4 of Planning Policy Wales (Edition 11, February 2021). The words ‘inappropriate development’ is a replication from paragraph 6.5.4 of PPW. It isn’t defined further in PPW as this is predominantly a matter for Local Development Plans along with the Marine Plan and Future Wales.</p> <p>The National Park Authority’s and Pembrokeshire County Council’s Local Development Plans set out in what type of development is appropriate and inappropriate. This is supported by supplementary planning guidance.</p> <p>No change is proposed.</p>
11.	4716/ Bourne Leisure	<p>Under the heading “Aesthetic, perceptual and experiential qualities”, the draft SCA38 Seascape Character Area Description document describes the existing caravan park at Lydstep as a “significant intrusion in this coast” (our emphasis) and states that the existing water sports at Lydstep Bay “reduce tranquillity”. This language suggests a comparison to a suppositional context where there is no development or activity in the area. Lydstep Beach has been established for over 40 years, and development at the park is subject to planning controls. It cannot be said that the water sports activity reduces tranquillity, as the major holiday park will itself have associated urbanised activities and therefore, would ordinarily not be</p>	<p>A re-wording is suggested.</p> <p><i>‘This is the only significant intrusion development in this coast appearing as an organised block and sweep of white static caravans climbing from the beach to the cliff tops albeit framed by surrounding woodland. Significant activity emanates from this resort development in season with the use of the bay of noisy power boats and jet skis which reduce tranquillity on water and land.’ ✓</i></p>

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		<p>classified as being tranquil at this coastal location.</p> <p>Development proposals should be assessed with reference to the existing seascape context, and established holiday parks should be recognised as part of Pembrokeshire’s existing seascape character. Furthermore, holiday parks play a key role in local communities by attracting investment, providing jobs and supporting spending in the local area. Pembrokeshire’s economy relies heavily on the tourism industry. The SPG must not create value judgments and it must also support the delivery of the Local Development Plan policies. Based on this analysis, the use of negative language to describe development should be deleted throughout the emerging SPG. For example, the reference to caravan parks representing “intrusion” in the coast should be changed to “presence” within the coast. Similarly, the water sports activities at Lydstep Bay should be described in neutral language, with no reference to these uses “reducing tranquillity”.</p>	
12.	4716/ Bourne Leisure	<p>Objection Draft main SPG document: Table 1 Draft SCA Description Document: Cultural Benefits and Services</p> <p>Response (Role of tourism under cultural benefits and services) Draft Table 1 in the main draft SPG document sets out a list of ecosystem cultural services provided by the Pembrokeshire seascape, with subheadings including “Leisure/recreation”. However, this list does not include any reference to tourism, holidays or spending time with friends and family, which are key leisure and recreation activities at the Pembrokeshire coast.</p> <p>Furthermore, under the heading “Cultural benefits and services”, each draft Seascape Character Area Description document sets out details of the contribution of each SCA towards leisure, recreational, cultural and spiritual services. There is no reference to tourism within either the draft SCA38 or SCA39 Seascape Character Area Description document, despite the importance of this broad activity within each of these areas. Holidays in the Pembrokeshire countryside, with its access to the coast, bring significant</p>	<p>The lists set out in Table 1 relate to those leisure and recreational activities and experiences that can be explicitly linked to the seascape. Generic references such as ‘tourism, holidays and spending time with friends and family’ may or may not include a seascape connection. It is the nature of activity where direct linkages with the seascape can be identified that are listed.</p> <p>This is the same for SCA 38 and SCA 39 where the specifics of activity in relation to connectedness</p>

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		<p>physical and mental health and wellbeing benefits for visitors and so should be recognised as key cultural benefits in the emerging SPG. The Welsh Government's Welcome to Wales: Priorities for the Visitor Economy 2020-2025 report highlights that the health benefits of tourism include providing new opportunities to enjoy outdoor leisure and promoting active lifestyles. The tourism industry also creates benefits for local communities by providing jobs, attracting investment and generating expenditure for local businesses.</p> <p>Tourist accommodation, facilities and attractions should therefore be recognised within draft Table 1 of the main draft SPG document and under "Cultural benefits and services" within the draft SCA38 or SCA39 Seascape Character Area Description documents, with specific reference to existing caravan development at Lydstep Beach Holiday Park and Kiln Park Holiday Park.</p>	<p>with marine recreation, beach recreation, natural heritage, nature conservation etc. are highlighted.</p> <p>No change proposed.</p>
13.	4716/ Bourne Leisure	<p>Objection Draft main SPG Document: para 1.30, 1.39</p> <p>Response (Accurate Terminology) The language of the draft SPG is imprecise and inaccurate in places. At draft paragraph 1.30, the draft main SPG document describes the character and landscape of the undeveloped coastline as a "designation", which indicates a formal classification and is not accurate. The references to "protect" and/or "enhance" seascape character throughout the document should also be reviewed in order to align with, and not go further than, national and local planning policy.</p> <p>As another example, whilst Bourne Leisure endorses the proposed proportionate approach to the level of assessment required based on the scale and likely effect of a proposed development, as set out at draft paragraph 1.39 of the main draft SPG document, the terminology used should be clarified. Currently, draft paragraph 1.39 refers to a "screening and scoping process", whereas these are specific terms under the Environmental Impact Assessment and Habitat Regulations Assessment processes and so may create confusion when applied in other contexts.</p>	<p>It is proposed to replace the wording of paragraph 1.30 with the direct quote from Planning Policy Wales (Edition 11, February 2021) paragraph 6.5.9: <i>Development should not normally be proposed in coastal locations unless it needs to be on the coast. In particular, undeveloped coastal areas will rarely be the most appropriate location for development. Where new development requires a coastal location, developed coastal areas will normally provided the best option, provided that issues associated with coastal change have been taken into account.</i> ✓</p> <p>It is proposed to delete the words 'screening and scoping' from paragraph 1.39. ✓</p>

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		Based on this analysis, the terminology of the draft SPG should be revised for clarity and accuracy.	
14.	4716/ Bourne Leisure	<p>Objection Draft SCA Description Document: Aesthetic, perceptual, and experiential qualities</p> <p>Response (Forces for change) The draft SCA38 Seascape Character Area Description document lists a number of “Forces for change”, albeit it is unclear whether these are forces resulting in changes that have already occurred and/or changes that are expected in the future. One of the forces for change under the heading “Summary” is: “Caravan development with associated facilities at Lydstep Haven have increased over recent years.” However, we note that there has been limited development at Lydstep Beach Holiday Park in recent years, comprising a development of new static caravan bases at the western section of the park in 2006-2007 to create the Bowlands area but otherwise only relatively modest extension, alterations and works to various onsite facilities have been undertaken. It is therefore difficult to conclude that the caravan development has increased over recent years.</p>	<p>The identified forces for change list elements within the seascape character areas which have potential to change the character in the future. It is acknowledged that there has been little change to the number of caravans at Lydstep Beach Holiday Park in recent years and other developments in close proximity are likely to have been regarded as part of that site. The matter can be rectified by a rewording of the point as: Caravan and camping developments. ✓</p> <p>When reviewing physical characteristics of prevailing existing development or land management patterns in the study area if current trends continue then the change scenarios need to reflect more of the same. Past examples can illustrate how they typically alter a landscape.</p>
15.	4716/ Bourne Leisure	<p>The draft SPG documents do not recognise that there are positive opportunities for change, such as increased screening of existing development through landscape planting and the demand for higher quality holiday accommodation in scenic settings, which can provide opportunities for redevelopment of existing sites that will improve current impacts on seascape character.</p> <p>It is therefore considered that the reference to caravan development having increased at Lydstep Beach Holiday Park should be deleted from the “Forces for change” section of the draft Seascape Character Area Description document and that positive forces for change should also be recognised throughout the draft SPG documents.</p>	<p>The nature of the Assessment is to provide an analysis of forces for change that focuses on potential ‘threats’ – see Appendix D Table D2 ‘Forces for Change’.</p> <p>A fuller Landscape Sensitivity Assessment¹ would be required for all forms of development proposed.</p> <p>With reference to Caravan and Camping the Authority has published supplementary planning guidance² which details opportunities for environmental enhancement of sites.</p> <p>The specific reference referred is proposed for deletion but a reference to Caravan and Camping development more generally is proposed for insertion. ✓</p>

¹ <https://naturalresources.wales/landscape-sensitivity?lang=en>

² <https://www.pembrokeshirecoast.wales/planning/planning-policy/local-development-plan-2/supplementary-planning-guidance-ldp2/caravan-camping-and-chalet-supplementary-planning-guidance-interim/>

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16.	4716/ Bourne Leisure	<p>Objection Draft SCA Description Document: Factors contributing to potentially lower susceptibility and value</p> <p>Response (Factors contributing to potential sensitivity to change) The draft SCA38 Seascape Character Area Description document sets out a number of factors contributing to potentially lower sensitivity to change, including the presence of “Lydstep Haven with associated large organised caravan park and facilities” and the current water sports activities in the area. The name of Bourne Leisure’s holiday park at Lydstep, operating under its Haven brand, is “Lydstep Beach Holiday Park”. Bourne Leisure therefore requests that the name of the park is corrected within throughout the emerging SPG.</p> <p>Bourne Leisure endorses the recognition of the existing holiday park at Lydstep, together with the current water sports activities, as factors that contribute to potentially lower sensitivity to change. However, as noted in our representation above under the heading “Need for neutral language”, the reference to the current water sports activities “reducing tranquillity” should be deleted, as these activities are part of the existing baseline for the assessment of any potential impacts on seascape character from development proposals.</p> <p>The draft SCA39 Seascape Character Area Description document should set out an equivalent recognition of the presence of Kiln Park Holiday Park as a factor contributing to potentially lower sensitivity to change.</p> <p>Impacts on seascape character should be assessed in the context of existing development and activity, so it is important that these features are taken into account in the assessment of proposals within this area.</p>	<p>Agreed. The name ‘Lydstep Haven’ will be amended to ‘Lydstep Beach Holiday Park’. ✓</p> <p>A re-wording is suggested.</p> <p><i>‘This is the only significant intrusion development in this coast appearing as an organised block and sweep of white static caravans climbing from the beach to the cliff tops albeit framed by surrounding woodland. Significant activity emanates from this resort development in season with the use of the bay of noisy power boats and jet skis which reduce tranquillity on water and land.’</i> ✓</p> <p>Whilst Kiln Park is located within SCA39, it does not form part of the prominent views from the sea / coast, with Tenby Golf Course and mature vegetation providing a visual buffer from the beach. As such, it is not considered necessary to set out a recognition of Kiln Park Holiday Park in the same way that Lydstep has been considered in SCA38.</p>
17.	4716/ Bourne Leisure	<p>Supported Draft main SPG Document: Para 1.42, 2.14</p> <p>Response Bourne Leisure endorses the proposed provision at draft paragraph 1.42 of the draft main SPG document for subdividing SCAs into smaller areas when assessing effects on seascape character, as these</p>	<p>Support noted. As advised in paragraph 1.42 the approach taken will depend on the scale of development proposed but within the</p>

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		<p>smaller areas may have slightly different characteristics than the SCA as a whole. This proposed approach reflects the fact that the SCAs are broad, including built-up areas such as Tenby and Lydstep village, as well as rural, woodland and agricultural hinterland. It is not practical for the emerging SPG to provide a finegrained assessment that includes every feature of each SCA.</p> <p>We also note the recognition of survey limitations at draft paragraph 2.14, including gaps in information being filled by “the team’s local knowledge through living and working in the area”. Flexibility should therefore be provided for applicants to demonstrate up-to date and accurate information as part of the planning process.</p>	<p>parameters of the current seascape character assessment method.</p> <p>The commentary in paragraph 2.14 concerns the timing of the visit (the wintertime) and how local knowledge of the team was used alongside the Welsh Activity Mapping to ensure a comprehensive approach was taken to research undertaken.</p> <p>Applicants are free to submit relevant information that supports their applications for development.</p>
18.	4705/ NRW (SW Planning)	<p>Comments on Chapter 1: Introduction</p> <p>Information in the introductory chapter is broad in scope. Additional subheadings would improve readability and navigation in this chapter.</p>	<p>Agree to this amendment. Underlined headings are now included in this Chapter. See paragraph 1.1, 1.4,1.5,1.6,1.7, 1.9,1.14,1.17✓</p>
19.	4705/ NRW (SW Planning)	<p>Paragraph 1.8. We recommend re-wording as follows to improve clarity: ‘Policy SOC_06: Designated landscapes, requires proposals to demonstrate how potential impacts on the purposes and special qualities of National Parks have been taken into consideration’.</p>	<p>Agree to this amendment. ✓</p>
20.	4705/ NRW (SW Planning)	<p>Paragraph 1.8. For completeness, we recommend adding that ‘regarding Designated Landscapes and Seascapes, both Policies SOC_06 and SOC_07 require proposals to a) avoid adverse impacts, b) where they cannot be avoided, minimised and c) where they cannot be minimised, mitigated’.</p>	<p>Agree to this amendment. ✓</p>
21.	4705/ NRW (SW Planning)	<p>We note paragraphs 1.7 and 1.8 focus on national level policy considerations, but focus only on the Wales National Marine Plan, which covers up to MHWS. As this assessment also includes terrestrial areas, we recommend referring here to Planning Policy Wales, particularly in relation to how this SPG meets the requirement for the Authorities to:</p> <ul style="list-style-type: none"> • clearly establish what the coast means for them, reflecting the characteristics of their coastlines, and, • providing evidence on the natural beauty and special qualities of the PCNP, which they will have regard to in exercising their functions. 	<p>Agree to these amendments. ✓</p>

Rep No.	Reference	Representation	Officer Response and Recommendation
		With development plan status, Future Wales: The National Plan 2040 is also relevant. Policy 32 – Haven Waterway and Energy highlights potential seascape impacts of energy proposals in the waterway and could be referenced in the SPG.	
22.	4705/ NRW (SW Planning)	Paragraph 1.25 third bullet. we recommend the addition of 'or above sea level' to reflect the nature of offshore development.	Agree to this amendment. ✓
23.	4705/ NRW (SW Planning)	Paragraph 1.26 includes a definition of 'seascape'. It would be helpful to also include this definition at, or relocate it to, the start of the document to provide an immediate definition of seascape/landscape for non-technical users.	Agree to this amendment. ✓
24.	4705/ NRW (SW Planning)	Paragraph 1.28. This is a repeat of the open list in PPW11, but we consider it would be helpful to also include a statement to explain that although offshore wind generation is not listed specifically, it is expected to be an increasingly strong seaward development pressure around the National Park.	Agree to this amendment subject to the text saying 'the Pembrokeshire coast' rather than 'the National Park'. ✓
25.	4705/ NRW (SW Planning)	Paragraph 1.38. We advise this paragraph should be updated to reference Planning and Environment Decisions Wales (PEDW) as the DNS authority.	Agree to this amendment. ✓
26.	4705/ NRW (SW Planning)	Paragraph 1.41. We suggest re-wording this paragraph to capture the wider policy context, as follows: 'As part of their assessment of effects on seascape character, developers and their consultants should describe how the proposals have responded to the key characteristics and qualities of the SCAs. In doing so, they should have particular regard for the conservation and enhancement of those aspects which contribute to the PCNP's Special Qualities'.	Agree to this amendment. ✓
27.	4705/ NRW (SW Planning)	Paragraph 1.42. Seascape Character Assessments should be replaced with seascape character areas or SCAs.	Agree to this amendment. ✓
28.	4705/ NRW (SW Planning)	Paragraph 1.45. We recommend the addition of the following text to provide additional relevant information based on best practice: 'If key characteristics change, or are lost, there would be	Agree to this amendment. ✓

Rep No.	Reference	Representation	Officer Response and Recommendation
		significant consequences for the current character of the landscape/seascape’.	
29.	4705/ NRW (SW Planning)	<p>Comments on Chapter 2: Methods</p> <p>We are satisfied with the methodology adopted for describing seascape character.</p> <p>Paragraph 2.4. We advise that this list should be updated to include the latest NRW evidence reports on seascape and visual sensitivity to offshore wind farms, which is structured between the following three reports:</p> <ul style="list-style-type: none"> • Stage 1 - The relationship between distance of offshore turbine away from a sensitive receptor and magnitude of visual effects • Stage 2 - Offshore wind farm siting and design guidelines in relation to seascapes • Stage 3 – Visual sensitivity of the marine settings of Wales’s Designated Landscapes to offshore wind farms <p>Paragraph 2.7. should also include NRW GN 017 Landscape Sensitivity Assessment Guidance for Wales, 2022.</p>	<p>Support noted.</p> <p>Agree to this amendment. ✓</p> <p>Agree to this amendment. ✓</p>
30.	4705/ NRW (SW Planning)	<p>Comments on Chapter 3: Overview of the Pembrokeshire Seascape</p> <p>We recommend the inclusion of the PCNP Special Qualities within this chapter</p>	Agree to this amendment. ✓
31.	4705/ NRW (SW Planning)	<p>Comments on Chapter 4: Cultural Benefits and Services</p> <p>No Comments</p>	Noted.
32.	4705/ NRW (SW Planning)	<p>Comments on Chapter 5: Forces for Change</p> <p>Paragraph 5.1. In referring to forces for change, this paragraph refers exclusively to the Special Qualities of the National Park. As this is not only a National Park assessment, NRW advise that the study might also reflect on how forces for change may affect the key characteristics and qualities of all seascapes within the study area.</p>	<p>Agree. The following amendment to paragraph 5.1 is proposed: <i>‘Forces for change have been considered in respect of how they affect the special qualities of the National Park. They can be divided into natural processes and climate change, marine/water-based activity, coastal development and marine related activity and land management. A particular focus has been provided in terms of how forces for change affect the special qualities of the National Park.’ ✓</i></p>
33.	4705/ NRW (SW Planning)	<p>Comments on Chapter 5: Forces for Change</p> <p>Paragraph 5.4. Offshore wind energy development, both individually and in combination, is a potentially significant force for change. This type of development is expected to put pressure</p>	The inclusion of additional paragraphs after paragraph 5.4 is agreed subject to edits.

Rep No.	Reference	Representation	Officer Response and Recommendation
		<p>on seascape character within Pembrokeshire. Given the significance of this pressure, we recommend that a separate paragraph is included which references the recent consenting of Erebus FLOW and other developments for offshore wind in planning, including Llyr and Valorous. The potential for offshore wind development to harm Special Qualities of the PCNP and wider characteristics and qualities of the seascape areas might be noted. Particularly with regards to the potential impacts on perceptual and sensory qualities. In relation to this, we recommend including an advisory that NRW evidence reports on seascape and visual sensitivity to offshore wind farms are considered as part of the development planning process. These reports specifically highlight the high sensitivity of the Pembrokeshire seascape to offshore wind.</p> <p>In relation to offshore wind, it should be noted that this technology will also require other works which have the potential to impact on seascape character, including the construction of cable routes, landfall and transmission works, and the construction of substations, including onshore and offshore. A recent example of the latter includes current proposals for a multi-connection offshore substation within the Pembrokeshire Demonstration Zone.</p>	<p><i>'In terms of offshore renewable energy there are several potential projects (August 2023) to consider. The potential impacts on the Special Qualities of the Pembrokeshire Coast National Park and wider characteristics and qualities of the seascape areas requires careful assessment, particularly with regards to the potential impacts on perceptual and sensory qualities. Natural Resources Wales evidence reports on seascape and visual sensitivity to offshore wind farms will need to be considered as part of the relevant consenting regime. The Natural Resources Wales reports specifically highlight the high sensitivity of the Pembrokeshire seascape to offshore wind.</i></p> <p><i>The Seascape and Visual Sensitivity to Offshore Wind farms in Wales (Parts 1 to 3)^{*3}: This strategic assessment and guidance document sets out a desk-based assessment of the sensitivity of the Welsh Seascape for different heights of turbines up to 350m taking into account existing mapped areas such as National Parks and Areas of Outstanding Natural Beauty (AONBs) and seascape character areas. The aim is to avoid significant adverse effects on high sensitivity seascape receptors. The overall study focusses primarily on potential recommended buffers for National Parks and AONBs. (page 12, Part 3) The general conclusions are that the seascape of Wales is highly sensitive in many areas. Detail is provided on sensitivity to offshore wind farm development in different zones (starting page 14, Part 3) with specific reference to issues for Pembrokeshire also commented upon. Detail is also provided in the documentation</i></p>

3

*insert a weblink to the docs:

Stage 1 <https://cdn.naturalresources.wales/media/689503/eng-evidence-report-315-seascape-and-visual-sensitivity-to-offshore-wind-farms-in-wales.pdf> Report Number 315

Stage 2 <https://cdn.naturalresources.wales/media/689506/eng-evidence-report-330-seascape-and-visual-sensitivity-to-offshore-wind-farms-in-wales-copy.pdf> Report Number 330

Stage 3 <https://cdn.cyfoethnaturiol.cymru/media/689508/eng-evidence-report-331-seascape-and-visual-sensitivity-to-offshore-wind-farms-in-wales.pdf> Report Number 331

Rep No.	Reference	Representation	Officer Response and Recommendation
			<p><i>regarding how the findings are caveated and how they should be treated when considering the visual impact of individual proposals.</i></p> <p><i>In relation to offshore wind, it should be noted that this technology will also require other works which have the potential to impact on seascape character, including the construction of cable routes, landfall and transmission works, and the construction of substations, including onshore and offshore. ✓</i></p> <p>Finally, a formatting error needs to be rectified. The six words at the end of paragraph 5.3 needs to be moved to the beginning of paragraph 5.4. ✓</p>
34.	4705/ NRW (SW Planning)	<p>We advise that the above forces for change should be referenced throughout the relevant SCA descriptions. For example, Erebus will impact on SCAs such as SCA25 and additional schemes may exacerbate those impacts.</p> <p>We note that a summary table addressing forces for change is included in each SCA description. In some instances, the reasoning behind the information presented in the table is not clear. For example, SCA21 has blue shading for 'Offshore energy or minerals' against several Special Qualities.</p> <p>The legend states that the shading represents 'change occurring in the area affecting the special quality'. The accompanying summary of the forces for change does not describe any such change occurring in the area. It only references the potential for future oil and gas licenses to change the character of the area. We recommend this issue is checked and updated where necessary to clarify whether the forces for change are occurring and/or if they have a reasonable likelihood of occurring.</p>	<p>See proposed amendment above.</p> <p>As offshore minerals exploration is considered unlikely at this point it is proposed to remove reference to it as a force for change in this iteration of the guidance.</p> <p><u>This edit will need to be done before the final guidance is published.</u></p>
35.	4705/ NRW (SW Planning)	<p>Comments on Chapter 6: Sensitivity of seascape</p> <p>To avoid any possible confusion, we consider that it would be helpful to make it clear that the SPG does not contain a sensitivity assessment.</p>	<p>Agree to this amendment. The sentence 'Please note that this guidance does not contain a Sensitivity Assessment.' has been added to the end of paragraph 5.1.</p>

Rep No.	Reference	Representation	Officer Response and Recommendation
		<p>Further, whilst we welcome highlighting key aspects of sensitivity, it is not clear how the list in Chapter 6 was derived or how it relates to factors in Appendix E, the individual SCA descriptions, or existing information on landscape character and special qualities within other SPG. No specific type of development is considered in relation to the information presented on sensitivity, and therefore these lists are generalised. This should be made clear along with the relationship between the above information.</p>	<p>Agree to this clarification. Paragraph 6.2 of Chapter 6 has been edited to advise <i>‘Characteristics and features are set out for each Seascape Character Area...’</i> This will distinguish the list as being highlights of key characteristics and features for the coast of Pembrokeshire generally. More detailed analysis at the Seascape Character Area level provides advice on sensitivities in relation to forces for change for that specific character area.</p>
36.	4705/ NRW (SW Planning)	<p>Comments on Chapter 7: Figures</p> <p>Information on the figures is difficult to read and, in some cases, illegible due to the presentation of the entire study area within a small map extent on an A4 page. Given the importance of the graphical information in supporting the text, we recommend consideration is given to either separating the information onto different figures covering different parts of the study area or increasing the proportion of the page used for the mapping by reducing the size of the legend and increasing the page size to A3.</p> <p>Other figures are difficult to read due to presentational issues. For example, linework is hidden by other linework on Figure 6 which makes it difficult to follow the extent of spatial areas defined and the basemap is often obscured.</p>	<p>Where data is available a more interactive version of the Figures is being developed by Officers.⁴ This should provide greater clarity.</p> <p>It will be important to note where the more up to date information than the Supplementary Figures rely on is being made available in the interactive mapping.</p>
37.	4705/ NRW (SW Planning)	<p>Chapter 8: List of Seascape Character Areas</p> <p>Comments on this chapter relate to the Seascape Character Area descriptions.</p> <p>At the end of each Seascape Character Area description is a list of ‘Key factors to be taken into account when assessing sensitivity to change’. We advise that combining indicators (or ‘factors’) of susceptibility and value in relation to different sensitivity criteria is not recommended as each require separate judgements based on different albeit often closely related indicators. It is possible this approach may cause confusion with some users.</p>	<p><i>While the approach in this Supplementary Planning Guidance draws on the advice referenced, as well as guidance published by Natural Resources Wales, the Authority has found in the past that there is overlap between ‘susceptibility’ and ‘value’ indicators and therefore a set of sensitivity criteria is used that takes into account aspects of both. It is considered that this is</i></p>

⁴<https://pcnpa.maps.arcgis.com/apps/instant/portfolio/index.html?appid=b999a064583942a9b79acfa3db49f36c> Draft

Rep No.	Reference	Representation	Officer Response and Recommendation
		<p>Further, the list of 'factors' contributing to value should already be reflected in the key characteristics, and if they are not, we recommend that they are. For consistency, it might be beneficial to replicate the approach used in the PCNP LCA SPG, which treats key characteristics as a more detailed summary of the Park's special qualities i.e., factors contributing to high value.</p>	<p><i>an appropriate approach for this Guidance, which has a strategic purpose, in contrast to more site-specific assessments, such as Landscape and Visual Impact Assessments.</i></p> <p>It is proposed to insert the above explanation in paragraph 5.1 of Appendix E which provides a context for the approach in the individual Seascape Character Areas.</p> <p>The factors contributing to value are already reflected in the Key Characteristics. There is as accepted by the commentator an overlap between susceptibility to change in characteristics and factors contributing to value.</p> <p>An additional edit is also needed regarding column headings in each of the Seascape Character Areas to delete the column headings 'Factors contributing to potentially higher susceptibility and value' and 'Factors contributing to potentially lower susceptibility and value' The columns below will be merged. Officers will carry out this edit for each of Seascape Character Areas. A sample edit for Seascape Character No.1 Teifi Estuary is provided in Appendix B. This edit will need to be done with all the SCAs before the guidance is published.</p>
38.	4705/ NRW (SW Planning)	<p>Comments on the Appendices</p> <p>Appendix A Data and Sources: We note multiple references to CCW which should be updated to NRW.</p> <p>The list in Appendix A omits reference to studies which we understand were taken into consideration in the preparation of the SPG, notably: National Seascape Assessment for Wales LUC NRW Evidence Report No: 80 November 2015.</p> <p>For clarity it is recommended that the full title of the study referenced is given e.g., Pembrokeshire Coast National Park Landscape Character Supplementary Planning Guidance, 2011 (Updated 2015).</p> <p>It is not clear whether the latest data on Dark Skies and Light Pollution in Wales or the accompanying information on tranquillity and place NRW Report No:</p>	<p>Reference can be made to the change in name.</p> <p>Include reference.✓</p> <p>Include up to date reference.✓</p> <p>Appendix A does list the LUC Dark Skies information which is linked to this report online. (mapping is in km2</p>

Rep No.	Reference	Representation	Officer Response and Recommendation																								
		<p>514, were considered.⁵ If not, we recommend this information is considered.</p> <p>Several Dark Sky Discover sites are found within the PCNP close to the shore. We recommend that this information is reflected in the SPG, including in the SCA descriptions. For example, Newgale Beach and National Park Car Park is a Dark Sky Discover site and could be referenced in the description of SCA21.</p>	<p>and not fine grained enough to use for specific referencing in the SCAs) Light pollution/dark skies are noted where relevant in the SCA characterisations and sensitivities.</p> <p>It should also be noted that there is an area of bright sky adjacent to the The Havens area shown in Report No.514 highlighting where oil tankers and LNG ships shelter.</p> <p>Agree to also include reference to Dark Sky Discovery Sites. The relevant DSD sites and their SCAs are tabled below. (One DSD site – Sychpant – does not lie within an SCA. The closest SCA to it is SCA 4 Newport Bay.)</p> <p>The DSD points would need to also be included on the relevant maps. The maps are shown in Appendix B</p> <table border="1"> <thead> <tr> <th>site name</th> <th>sca_id</th> <th>name</th> </tr> </thead> <tbody> <tr> <td>Poppit Sands</td> <td>SCA1</td> <td>Teifi Estuary</td> </tr> <tr> <td>Skrinkle Haven car park</td> <td>SCA38</td> <td>Lydstep Haven coastal waters</td> </tr> <tr> <td>Martins Haven National Trust car park</td> <td>SCA25</td> <td>Skomer Island and Marloes Peninsula</td> </tr> <tr> <td>Garn Fawr National Trust car park</td> <td>SCA11</td> <td>Strumble Head to Penbwchdy</td> </tr> <tr> <td>BroadHaven South Car Park</td> <td>SCA36</td> <td>Stackpole coastal waters</td> </tr> <tr> <td>Kete National Trust car park</td> <td>SCA26</td> <td>Skokholm and Gateholm coastal waters</td> </tr> <tr> <td>Newgale Beach and National Park Car Park</td> <td>SCA21</td> <td>St Brides Bay coastal waters east</td> </tr> </tbody> </table>	site name	sca_id	name	Poppit Sands	SCA1	Teifi Estuary	Skrinkle Haven car park	SCA38	Lydstep Haven coastal waters	Martins Haven National Trust car park	SCA25	Skomer Island and Marloes Peninsula	Garn Fawr National Trust car park	SCA11	Strumble Head to Penbwchdy	BroadHaven South Car Park	SCA36	Stackpole coastal waters	Kete National Trust car park	SCA26	Skokholm and Gateholm coastal waters	Newgale Beach and National Park Car Park	SCA21	St Brides Bay coastal waters east
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39.	4705/ NRW (SW Planning)	Appendices B and C: No comments.	Noted.																								
40.	4705/ NRW (SW Planning)	<p>Appendix D:</p> <p>Paragraph 4.2. we note reference to the NP Management Plan, but we do not recognise some of the quoted text. For example, no reference is made in the Management Plan to 'the ways of 'particular significance' in which the appearance and integrity of the landscape may be under threat'. The source of this information is not clear.</p>	<p>Agree. The references are from a previous Management Plan. Delete para 4.2.</p>																								

⁵ <https://luc.maps.arcgis.com/sharing/rest/content/items/a76b00da19dc4d3d8ef19224db7a3184/data>

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		Similarly, paragraph 4.3 is intended to be a repeat of information from the Management Plan on factors likely to affect remoteness and tranquillity in the National Park, however we have been unable to find the original source of this information.	Agree. The references are from a previous Management Plan. Delete para 4.3.
41.	4705/ NRW (SW Planning)	<p>Appendix E:</p> <p>Paragraph 5.1. This paragraph states the study brief included the need to explore the sensitivity of SCAs to different types of development. However, we note this has not been included in the study and clarification of its exclusion could be added.</p>	<p>Agree to inserting additional text in paragraph 5.2 Appendix E.</p> <p><i>'New paragraph: Please note that given the wide range of development types/or potential change in seascape locations this guidance does not contain a fuller sensitivity assessment which would have provided an assessment on levels of sensitivity for different forms of development for each character area. Instead, the study focuses on highlighting factors or indicators likely to affect sensitivity when considering proposals.'</i></p>
42.	4705/ NRW (SW Planning)	<p>Appendix E:</p> <p>Paragraph 5.2. Acknowledges that the concept of inherent sensitivity is no longer supported by best practice guidance, however we note there is no guidance within the SPG on what indicators might or might not be relevant to different types of change or development. Information on sensitivity is therefore generalised and a note might be added that it be treated with a level of caution reflecting its generic nature.</p>	<p>A new paragraph has been added before paragraph 5.2 to explain the role of the Guidance. ✓</p> <p><i>'New paragraph: 'Please note that given the wide range of development types/or potential change in seascape locations this guidance does not contain a fuller sensitivity assessment which would have provided an assessment on levels of sensitivity for different forms of development for each character area. Instead, the study focuses on highlighting factors or indicators likely to affect sensitivity when considering proposals.'</i></p>
43.	4705/ NRW (SW Planning)	<p>Appendix E:</p> <p>Table E1. We recommend adding a reference to LANDMAP in relation to Table E1. LANDMAP evaluations and their associated individual evaluation criteria form a good starting point for indicators of different forms of landscape value, regardless of designations.</p> <p>We note that paragraph 5.1 refers to An Approach to Seascape Sensitivity Assessment (MMO1204), 2019. However,</p>	<p>LANDMAP has been used and referenced extensively through the drafting of the guidance, as has other evidence. The content of Table E1 synthesises all evidence including LANDMAP to define factors affecting. No change is proposed.</p> <p><i>'While the approach in this Supplementary Planning Guidance draws on the advice referenced, as</i></p>

Rep No.	Reference	Representation	Officer Response and Recommendation
		<p>in departure from that guidance, Table E1 groups susceptibility and value criteria.</p> <p>We advise these criteria are typically treated separately as they are two different considerations with different influences. MMO1204 includes separate long lists for susceptibility criteria and value criteria (Annex B), and the latest NRW guidance on landscape sensitivity also separates out considerations of susceptibility and value. We consider it would be helpful to acknowledge this in the study and include an explanation for the different approach taken in this SPG.</p>	<p><i>well as guidance published by Natural Resources Wales, the Authority has found in the past that there is overlap between ‘susceptibility’ and ‘value’ indicators and therefore a set of sensitivity criteria is used that takes into account aspects of both. It is considered that this is an appropriate approach for this Guidance, which has a strategic purpose, in contrast to more site-specific assessments, such as Landscape and Visual Impact Assessments.</i></p> <p>It is proposed to insert the above explanation in paragraph 5.1. ✓</p>
44.	4705/ NRW (SW Planning)	Appendices F-H: No comments.	Noted.
45.	4718/ Libby Taylor (National Park Authority Officer)	<p>Would it be possible to include seaweed and shellfish farms as an issue affecting SCA 17 (Ramsey Sound) and 20 (St Brides Bay north)?</p> <p>They are a new use of the sea here and are at least if not more visually intrusive than the moorings and trip boats around St Justinians so I think need to be included.</p>	Agree amendment.
Trees and Woodland			
46.	3873/ V Moller	<p>While the rugged tops of mountains suit being unplanted, high land with thin acid soils can be enriched by tree planting. Naked hills appeal visually but are impoverished habitats supporting very little soil or fertility or abundance. Mixed woodland can increase depth and richness of habitats, larger fauna with more complex behaviour and more developed complex ecosystems. They also capture carbon and allow for forestry products if harvested sustainably.</p> <p>Woodland should be planted with respect for competing uses, allowing space for all needs, eg recreation, sports like mountain biking, paths, wind turbines, food production. Lower land and land closer to habitations should be protected for food production to enable food sufficiency on the doorstep. Trees should not displace productive food growing land but should complement it eg with shelter belts, shelter for livestock, forage for grazing animals, access to wood for heating for residents, harvested to maintain the woodland health and its wildlife habitats.</p>	<p>The purpose of this Guidance is to enable land managers / agents to site woodlands appropriately within the landscape.</p> <p>Upland areas in the National Park include a variety of landscapes including valued semi-natural habitats such as heathland, grassland, existing woodland, and peat, with large areas designated as Special Areas of Conservation, Sites of Special Scientific Interest. Many of these landscapes are also registered Historic Landscapes.</p> <p>Para 2.12 of the draft Guidance states that “Establishing woodlands on areas of species-rich grassland, heathlands or peatlands, can reduce biodiversity or even release more carbon than will be stored by the planted trees. Trees can also damage buried archaeology, historic sites and their settings.” The guidance promotes the environmental benefits of a mosaic of</p>

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		<p>It is vital that planning avoids undermining human agency and sufficiency - Everyone should have the right (permitted development) to produce the energy, food and wood that they need to sustain themselves on their own land, and the same right should apply to communities, provided of course that they do not damage the ability of others to do the same.</p>	<p>open habitats, farmland and woodlands within upland areas.</p> <p>Specific guidance for upland areas of the National Park is included; of particular relevance here are:</p> <ul style="list-style-type: none"> • LCA 22 Mynydd Carningli (low landscape sensitivity up to 5ha broadleaved planting) • LCA 26 Cwm Gwaun – Afon Nyfer (low landscape sensitivity up to 15ha broadleaved planting) • LCA 27 Preseli Hills (low landscape sensitivity up to 5ha broadleaved planting). <p>No change is proposed.</p>
47.	4715/ G Lewis	<p>With reference to PCNC draft consultation above, and in particular the area marked LCA 18, St Davids Headlands, but relevant to inland areas as well.</p> <p>The Peninsula landscape character has been damaged significantly by agricultural management over the last 20 to 30 years in a number of ways perceptible to locals and visitors alike.</p> <p>In a few cases hedge banks have been removed to enlarge fields or gateways (the photograph of [redacted] ironically is one of those ... it used to be divided as two fields until late 90s). But more obvious has been the decrease in height and volume of hedge growth and the mangling of hedge bank trees (hawthorns) into flailed boxes or merely stumps.</p> <p>The result, visually, is uniformity and loss of "landscape character" which had been in the response of trees, gorse and blackthorn scrub to coastal weather. Wind-shaped scrubby trees are now rare, lumpy gorse clumps on banks have mostly disappeared. Uniform, straight, level hedge flailing annually has removed the distinctive Peninsula character as well as significant wildlife habitats.</p> <p>Hence, I suggest that the advice given in future STRONGLY argues for REDUCTION of hedge flailing, and RESTORATION of hedge bank trees and scrub, as well as subdivision of overlage coastal fields with new banks and hedges.</p> <p>Woodland regrowth in this LCA18 area is naturally ongoing as small fields are abandoned (Caerbwdi Valley and Llanunwas Valley are examples of this), with or without conscious tree planting. However new woodland or scrub</p>	<p>The primary focus of the Tree and Woodland Guidance is to provide advice on the types of landscapes where sensitivities may allow new trees or woodland planting, ensuring that considerations of 'right tree, right place' are taken into account. As stated in para 3.3 of draft Guidance "A significant proportion of the woodland in the National Park comprises trees growing along linear features, including hedgerows, and streams" and the importance of hedgerows and their management is recognised within the guidance.</p> <p>Para 2.13 of the draft Guidance recognises the importance of "the existing landscape framework (such as strengthening hedgerow networks and links to existing woodland, as well as new planting)"</p> <p>Paras 2.2-2.4 of the draft Guidance reproduce text from Planning Policy Wales (Feb 2021) regarding hedgerows.</p> <p>The guidance for LCA 18, St Davids Headland, cites the 'pattern of irregular small-medium scale fields enclosed by hedgerows' as a key landscape sensitivity and restoration of hedgerows is noted as a key opportunity for future tree and woodland coverage within the LCA.</p> <p>Guidelines for the LCA include 'allowing hedgerows to grow out through reduced coppicing/flailing cycles to enhance biodiversity'.</p> <p>The extensive network of semi-natural habitats, including scrub is also noted as a key sensitivity, and</p>

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		<p>areas can be encouraged to create corridors of wilder habitat to benefit wildlife excluded from and damaged by intensive agriculture here. Insecticides, fungicides, slurry spreading, and late spring silage mowing are damaging plant, insect and bird populations throughout the National Park, within fields and in a halo around them. The only protection, other than transforming the way agriculture is practised, is to create wider woodland, scrub and hedge buffer zones throughout.</p> <p>I hope that PCNP's work will play its part in halting the damage and making progress in restoring places for nature.</p>	<p>regeneration/creation of woodland (up to small-medium scale) and scrub noted as an opportunity.</p> <p>The representation is noted, but in the light of the above comment no change is proposed.</p>
48.	3617/ Coal Authority	It is noted that this current consultation relates to guidance on trees and woodland and I can confirm that the Planning team at the Coal Authority have no specific comments to make on this document	Noted.
49.	4705/ NRW (SW Planning)	<p>Comments on Chapter 1: Introduction</p> <p>To avoid potential confusion and/or omission by relevant users, we advise that the purpose of the SPG could be expressed more clearly through its title and the introductory chapter. The current title is generic and does not reflect the specific content and purpose of the study, which is an assessment of the sensitivity of existing landscape character areas to woodland creation.</p> <p>We suggest that the SPG title conveys the fact that it is primarily a 'landscape sensitivity assessment to new woodland' and that the introductory paragraphs expand on the study purpose and content. Currently, paragraph 1.1 sets the context for the study and begins with 'Tree and woodland planting play a key role in mitigating biodiversity loss and the effect of a changing climate'. Whilst this is relevant context, neither of these roles of woodlands are addressed in this study, and therefore it may aide clarity if this type of contextual information follows after an explanation of the landscape assessment context and purpose of the study.</p>	<p>Agree. It is envisaged that further specific advice may become available regarding biodiversity and heritage sensitivities in the National Park.</p> <p>It is proposed to add a sub-heading to the existing document title, "A landscape sensitivity assessment to woodland creation."✓</p> <p>Para 1.1 exists to provide context for the reasons for tree-planting, including contemporary drivers (such as carbon sequestration), and why it is therefore considered that the guidance is needed – since landscape enhancement is not usually of itself a driver for tree-planting.</p> <p>The placing of the contextual information in the document was discussed; on balance it was concluded that the policy context for the guidance should precede a description of its specific purpose, which follows at paras 1.5-1.9. Officers have further reviewed this and no change is proposed.</p>

Rep No.	Reference	Representation	Officer Response and Recommendation
		<p>The study is prefaced on the principle of ‘the right tree in the right place’. This principle could be used in the introduction to clarify what the SPG does and does not do. For example, this study does not provide guidance on ‘the right tree’, instead it defers to other existing guidance for that information e.g., at Para 2.28.</p> <p>In relation to ‘the right place’, this guidance is concerned with the ‘right place’ in terms of landscape character, but crucially it is not concerned – in any detailed sense - with considerations such as ecology which, as recognised later in the main body of the study, requires further detailed work.</p>	<p>The phrase “the right tree in the right place” is being used here to reflect an aspiration to which this (landscape) guidance will contribute. The phrase is also used in the South West Area Statement.</p> <p>It is noted that the guidance for each LCA contains the standard text “The focus of this Guide is on the sensitivity and opportunities for woodland creation in relation to landscape character. It can only play an advisory role in the weighing of potential benefits of woodland creation against likely impacts on non-woodland habitats and cultural heritage assets, which should be considered in more detail at site level. Please refer to the main report for more detail.”</p> <p>It is proposed to amend the concluding sentence in para 1.4, and add to it, to read “This Guide aims to direct woodland to the most appropriate locations in terms of landscape sensitivity, while supporting opportunities for the positive management of non-woodland habitats. It is envisaged that further specific advice may become available regarding biodiversity and heritage sensitivities in the National Park.” ✓</p>
50.	4705/ NRW (SW Planning)	<p>Comments on Chapter 2: Methodology and Scope</p> <p>We note that the study does not appear to have been informed by LANDMAP nor does it refer to it for additional information. As advised in paragraph 6.3.12 of Planning Policy Wales (PPW), ‘LANDMAP and any associated landscape character assessments ... should be used to inform local landscape policies and SPG’.</p> <p>Further reference to LANDMAP is provided in paragraphs 6.3.20 and 6.3.21 of PPW, which state ‘LANDMAP is an important information resource, methodology, and monitoring baseline for the landscapes of Wales, which can help inform planning for the sustainable management of natural resources in an area.</p> <p>LANDMAP describes and evaluates the physical, ecological, visual, cultural and historic aspects of the landscapes of</p>	<p>LANDMAP Aspect Area boundaries were included in the GIS information used in the assessments.</p> <p>It is proposed to include the following reference to LANDMAP at para 3.18: “LANDMAP is a source of further relevant information, particularly as it includes information on existing woodlands, including evaluation and guidance for management as part of the Landscape Habitats Aspect.”✓</p>

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		<p>Wales, and provides the basis of a consistent, quality assured national approach to landscape assessment. LANDMAP assessments can help to inform green infrastructure assessments, SPG on landscape, development management decisions, landscape character assessment, special landscape areas (SLAs), local distinctiveness, design, and landscape sensitivity studies. Planning authorities should draw upon LANDMAP in the preparation of landscape plans and assessments needed to inform development plans, SPGs and the development management process.</p> <p>In relation to the above, we advise that LANDMAP should be referenced in the SPG as a source of further relevant information, particularly as it includes information on existing woodlands, including evaluation and guidance for management as part of the Landscape Habitats Aspect.</p>	
51.	4705/ NRW (SW Planning)	<p>We acknowledge the inclusion of national policy context but advise that it should also include reference to Future Wales: The National Plan 2040, which has development plan status. Policy 9 – Resilient Ecological Networks and Green Infrastructure is considered relevant to the wider study context regarding the importance of trees and woodland. It sets out the recognised need to maximise the use of green infrastructure and nature-based solutions as part of shaping urban growth, supporting rural communities and responding to the twin challenges of addressing the climate emergency and reversing biodiversity decline. Woodlands of northern Pembrokeshire are specifically referenced at Point 7 on Page 79.</p> <p>Natural Resources Policy and the Area Statement for The Southwest prepared in response to this Policy are also relevant. The Area Statement includes taking a ‘right tree, right place’ approach to woodland management as a key theme and provides relevant guidance, such as ‘our river valleys provide a valuable opportunity for increasing native woodland that is close to coastal fringes and we would like the focus to be on individual woodlands’. One of the ‘next steps’ is to ‘increase native woodland networks’.</p>	<p>It is proposed to insert the following reference to Future Wales as a new sub-heading and paragraph to follow the current para 2.6: <i>“Future Wales: The National Plan 2040 (Welsh Government, 2021) Policy 9 – Resilient Ecological Networks and Green Infrastructure aims to ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure.”</i>✓</p> <p>It is proposed to include the following references to Natural Resources Policy and the Area Statement for the South West as a new sub-heading following the new <i>Future Wales</i> sub-heading proposed above: <i>“Natural Resources Policy (Welsh Government, 2017) and South West Wales Area Statement (Natural Resources Wales) Natural Resources Policy states that “trees and woodlands are vital in delivering...our national priorities. Wales needs both large and small scale, diverse woodlands that include both conifer and broad-leaved species”, that there should be “greater integration between</i></p>

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			woodland and other land uses....” and that “New woodland will need to be created and trees established to provide greater connectivity between, and increase the size of woodland habitat patches...”✓ The South West Wales Area Statement also adopts a “right tree, right place’ approach to woodland management.”
52.	4705/ NRW (SW Planning)	Paragraph 2.10. We advise that the hyperlink to our website does not work. We understand that the link should be to the following page: Natural Resources Wales / Grants for planting trees and creating woodlands	It is proposed to update the link at para 2.10 to Natural Resources Wales / Grants for planting trees and creating woodlands ✓
53.	4705/ NRW (SW Planning)	Paragraph 2.22. We query whether the third sentence needs amending to reflect the fact not all LCAs have guidance on enhancement through tree planting and management.	It is proposed to amend the third sentence in para 2.22 to read “Where relevant, management guidance is provided on how landscape character can be enhancement through tree planting and management.”✓
54.	4705/ NRW (SW Planning)	Paragraph 2.39. We advise that final guidance on landscape sensitivity assessment, not specifically in relation to wind and solar development, but spatial planning and land use change, has been published and should be referred to in this SPG. The document is called Landscape Sensitivity Assessment Guidance for Wales, Guidance Note 017, August 2022 and is available here: landscape-sensitivity-assessment-guidance-for-wales.pdf (cyfoethnaturiol.cymru)	It is proposed to amend para 2.39 by adding the following sentence to the end of the current paragraph: “Guidance on landscape sensitivity assessment, in relation to spatial planning and land use change, has been published by Natural Resources Wales: Landscape Sensitivity Assessment Guidance for Wales, Guidance Note 017, August 2022. ✓
55.	4705/ NRW (SW Planning)	Paragraph 2.41. We advise that best practice regarding the assessment of landscape sensitivity is to consider susceptibility and value indicators separately. Susceptibility is specific to the type of change considered whereas landscape value is inherent. This study appears to consider ‘sensitivity’ generally with criteria that overlap between those that would typically inform judgements on susceptibility and those which would typically inform judgements on value. We advise that this approach may cause confusion and that further explanation in Chapter 2 should be provided to explain this approach. In relation to this, we advise that it may be helpful to consider and reflect in the assessment that the national park designation indicates a high level of value. Information on the Special Qualities of each LCA is already provided in the existing Pembrokeshire Coast National Park Landscape Character SPG. This information should be cross-referenced	It is proposed that further explanation of the approach taken – using the text below - is inserted following paragraph 2.40, with a footnote to a list of the special qualities of the National Park as listed in the National Park Management Plan 2020-2024: “The method used to evaluate landscape sensitivity to woodland planting has been adapted from the approach used by Land Use Consultants (LUC) for many landscape sensitivity assessments. While LUC’s approach draws on advice contained in the Natural England guidance ‘An Approach to Landscape Sensitivity Assessment’ (2019), as well as guidance published by Natural Resources Wales, LUC has found in the past that there is overlap between ‘susceptibility’ and ‘value’ indicators and therefore a set of sensitivity

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		<p>and reflected in the list of 'key sensitivities' for each LCA. For the purposes of the study, it would be a reasonable and appropriate assumption to assume each LCA has high landscape value, and it is recommended that a statement to this effect is included in the study.</p> <p>Further to the above, we advise that it would be appropriate for the SPG to include the list of Special Qualities summarised in the Pembrokeshire Coast National Park Management Plan 2020-2024, repeated below:</p> <ul style="list-style-type: none"> • accessibility • coastal splendour • cultural heritage • distinctive settlement character • diverse geology • diversity of landscape • islands • remoteness, tranquillity and wildness • rich historic environment • richness of habitats and species • space to breathe • the diversity of experiences and combination of individual qualities 	<p>criteria is used that takes into account aspects of both. It is considered that this is an appropriate approach for this Guidance, which has a strategic purpose, in contrast to more site-specific assessments, such as Landscape and Visual Impact Assessments.</p> <p>LUC's indicators are tailored to the landscape change or development being considered (in this case trees and woodland) and the landscape being considered (in this case a nationally designated landscape). The study area is restricted to the landscape of the National Park, a landscape that is effectively all high value. This makes a division of criteria into 'susceptibility' and 'value' indicators more challenging, as the suggestion that parts of the National Park landscape are of 'higher value' than other, would effectively be double counting. Instead, the sensitivity criteria used in this study, include 'value' indicators, reflecting those special qualities of the National Park that could be impacted by tree and woodland planting. For example, the criteria for the 'Perceptual and scenic qualities', indicator covers many of the special qualities listed in the National Park Management Plan 2020-2024 that make the landscape of the National Park unique, such as 'coastal splendour', 'diversity of landscape', 'remoteness, tranquillity and wildness'.*</p> <p>The indicator for 'Historic Landscape Character' includes a consideration of the rich historic environment, and the indicator 'Field and landcover pattern' includes a consideration of the 'richness of habitats and species' as they relate to landscape character."</p> <p>*Footnote: The special qualities of Pembrokeshire Coast National Park are listed in the National Park Management Plan 2020-2024. They are: accessibility; coastal splendour; • cultural heritage; distinctive settlement character; diverse geology; diversity of landscape; islands; remoteness, tranquillity and wildness; rich historic environment; richness of habitats and species; space to breathe; the diversity of</p>

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		<p>Paragraph 2.42 refers to ‘overall landscape sensitivity’. NRW advise that this term is used in many landscape sensitivity assessments to report by whole landscape character areas. That is often sufficient for the strategic purpose in broad-scale spatial planning exercises. However, the following caveats should be reflected within the SPG:</p> <ul style="list-style-type: none"> • The landscape sensitivity of one part of an assessment unit may differ to that of another part. Such detail is not picked up without a finer scale of assessment. • Sensitivity levels are relative to other areas in the assessment. Levels may be calibrated differently in other assessments, meaning that direct comparison may not be correct. • Specific development proposals on specific sites may need their own, more detailed assessment, normally a landscape and visual impact assessment. <p>In relation to the above, we acknowledge the note provided in the green box after paragraph 4.1.</p> <p>Table 2.2. We note that the definition for each level of ‘overall sensitivity rating’ begins with a reference to ‘key characteristics and qualities of the landscape’, however nowhere in the assessment are these defined. Further, these definitions are akin to definitions of susceptibility, which, as advised above, may be a more appropriate term for the assessment being carried out.</p> <p>Paragraph 2.45 states that information on the sensitivity of each LCA is translated into overall scores of ‘landscape sensitivity’. Paragraph 2.47 states that ‘Professional judgement is made on overall landscape sensitivity, taking all criteria into account in the context of their importance to the landscape character and quality of the individual LCA’. We advise further narrative explanation on how scores were reached would be helpful.</p>	<p>experiences and combination of individual qualities. ✓</p> <p>It is proposed to add the following as a new paragraph inserted after current paragraph 2.43: “The following caveats should be noted:</p> <ul style="list-style-type: none"> • The landscape sensitivity of one part of an assessment unit may differ to that of another part. Such detail is not picked up without a finer scale of assessment. • Sensitivity levels are relative to other areas in the assessment. Levels may be calibrated differently in other assessments, meaning that direct comparison may not be correct. • Specific development proposals on specific sites may need their own, more detailed assessment, normally a landscape and visual impact assessment.”✓ <p>The phrase “key characteristics and qualities of the landscape” is used here as a non-specific reference to the sensitivities of each Landscape Character Area.</p> <p>Para 2.43 advises that the initial stage of the assessment involved a thorough desk-based study, drawing on sources of spatial and descriptive information regarding the landscape (these are listed at Appendix B of the draft Guidance).</p> <p>This initial work was supplemented by field survey work undertaken by a team of landscape professionals to verify the findings.</p> <p>Detailed sensitivity criteria descriptions are included in Table 2.3. Professional judgement was used to synthesise these criteria for each LCA; the overall sensitivity</p>

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			<p>ratings applied are described in Table 2.2.</p> <p>Taking the information in Table 2.3 and Table 2.2 together, it is not clear what further narrative explanation could be provided.</p> <p>Officers have considered placing Table 2.3 before Table 2.2, but concluded that this would more likely detract from than add to clarity.</p> <p>No change is proposed.</p>
56.	4705/ NRW (SW Planning)	<p>Comments on Chapter 3: Existing woodland character and guidance for woodland creation</p> <p>Paragraph 3.18 and Table 3.1. We query whether the factors listed in Table 3.1 should also be used to structure the 'Strategic guidance for new woodland / tree planting' within each LCA profile. The headings appear similar but differ slightly with the exclusion of some factors e.g., 'shape'. These factors also overlap with the 'sensitivity criteria descriptions' and it might aid comprehension if there were greater consistency between these headings/considerations.</p>	<p>The UK Forestry Standard sets out the standard for the planning, design and sustainable management of UK forests and woodland.</p> <p>The factors in Table 3.1 align with the guidance contained in the UK Forestry Standard (shape, landform, enclosure patterns, scale, diversity, unity, visual character, historic character, perceptual and scenic qualities). These are used in regard to forest / woodland design in the abstract.</p> <p>The strategic guidance headings in each LCA profile are comparable but align more closely to the sensitivity criteria set out in Table 2.3 (landform and scale, landcover (including semi-natural habitats), field pattern, existing tree and woodland character, historic character, visual character, perceptual and scenic qualities). However the purpose within the LCA profile is to contextualise strategic planting advice and align it with the specific LCA sensitivities.</p> <p>While they could be aligned further, or even wholly, it is considered that the factors in Table 3.1 and the headings in strategic guidance headings in each LCA profile are performing different tasks, and that the subtle differences between them have utility.</p> <p>No change is proposed.</p>
57.	4705/ NRW (SW Planning)	<p>Comments on Chapter 4: Overall Results</p> <p>No comments.</p>	Noted.
58.	4705/ NRW (SW Planning)	<p>Comments on Chapter 5: Opportunities for Woodland Creation.</p>	

Rep No.	Reference	Representation	Officer Response and Recommendation
		<p>We suggest including reference to delivering woodland planting in accordance with this guidance as part of landscape enhancement works associated with development proposals. Specific reference might be included to examples where landscape enhancement is being delivered in accordance with Policies SOC_06 and 07 in The Wales National Marine Plan, which state in relation to development proposals that ‘Opportunities to enhance designated landscapes are encouraged’.</p> <p>We advise it would be helpful if Figures 5.1-5.5 were linked to the LCAs. This might be achieved by including a list of applicable LCAs on the figures to which the opportunities relate, or by including reference to several key LCA examples.</p>	<p>It is proposed to include the following text, for prominence, in a paragraph inserted between the current paras 1.7 and 1.8 in Chapter 1: “This Guide may also be used to plan landscape enhancement works associated with development proposals. This includes landscape enhancement which is being delivered in accordance with policies SOC_06 and SOC_07 in the Welsh National Marine Plan 2019, which refer to enhancement of designated landscapes and of seascares.”✓</p> <p>Table 5.1 groups the LCAs into ‘typical landscapes’ which are illustrated in Figures 5.1 – 5.5. Table 5.1. already includes lists of the LCAs relevant to each typical landscape (barring ‘Islands’ and ‘Urban areas’, which are not illustrated). It is considered that the current layout provides good clarity. Duplication would arise if, as suggested, a list of applicable LCAs were included in Figures 5.1 – 5.5, since the LCA lists would also still need to appear in the Table 5.1. Additionally, Table 5.1 includes ‘Islands’ and ‘Urban areas’, meaning that the LCA list is complete in Table 5.1 (whereas 6 LCAs would be omitted from Figures 5.1-5.5). No change is proposed.</p>
59.	4705/ NRW (SW Planning)	<p>Comments on Appendices</p> <p>Appendix A Assessment Profiles: For each LCA profile there is a table called ‘Designated features and valued attributes within the LCA’. These tables appear to list only designations and recorded sites relating to natural heritage and cultural heritage aspects. As the LCAs have many other relevant ‘valued attributes’ a more appropriate name for the table might be ‘natural heritage and cultural heritage designations and records’.</p> <p>Currently, the landscape sensitivity of each LCA is summarised in a table with an overall sensitivity judgement for the different sizes and, where applicable, types of woodland assessed.</p> <p>It is not clear how these judgements were reached from the ‘overview’ text alone.</p>	<p>It is proposed to rename each of the LCA tables “Designated features and valued attributes within the LCA” to “Natural and cultural heritage designations and records”.✓</p> <p>Table 2.3 sets out in detail the criteria descriptions and examples of low – high sensitivity. The evaluation section sets out the key sensitivities for each LCA to new woodland and overview section sets out the reason for the judgements made.</p>

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		We advise that it would be helpful to include further detail of the assessment of each woodland type against the criteria in Table 2.3 . This would enable readers to understand the particular aspects of the landscape which are sensitive to new woodland. This could be included as an appendix.	<p>Unlike landscape sensitivity studies that are judging sensitivity to large scale development (e.g. renewables / urban extensions), where the impacts on the landscape are generally perceived to be negative, the emphasis of this study is on the opportunities for woodland/tree planting to add value and guidance on 'right tree, right place' – or in this case 'right woodland type in the right place'.</p> <p>It is not considered that addition of further detail is necessary, and no changes are proposed.</p>
60.	4705/ NRW (SW Planning)	<p>Appendix B Data/information sources</p> <p>No further comments</p>	Noted.
61.	4705/ NRW (SW Planning)	<p>Appendix C Glossary of terms and abbreviations</p> <p>No comments</p>	Noted.
62.	From the National Park Authority meeting minutes, 26th October 2022.	“It was therefore suggested that a paragraph summarising what the guidance meant in practice could be included at the beginning of each document and that this be included in the final version prior to its adoption.”	<p>It is proposed to insert the following subheading and text after paragraph 1.4 in the draft Guidance: “Relevance to local communities This Guidance provides advice on the types of landscapes where sensitivities may allow new trees or woodland planting, helping to guide the right tree to the right place.</p> <p>Advice is given for specific Landscape Character Areas within the National Park, and for grouped landscape types.</p> <p>The Guidance will be of relevance to communities who are planning to plant or restore trees or woodland, or who wish to comment on or otherwise influence the landscape implications of planting proposals.”✓</p>

Pembrokeshire Coast National Park Authority

Loss of Hotels and Guest Houses

Supplementary Planning Guidance

Consultation Date: 15th September 2021

Adoption Date:

**This item is also available in Welsh / Mae'r eitem hon ar gael
yn Gymraeg hefyd**

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Introduction

- 1.1 This Supplementary Planning Guidance (SPG) explains how the National Park Authority (NPA) will consider planning applications seeking to change hotels and guest houses in the National Park to other uses. It is aimed at helping prospective planning applicants to make an application and sets out the information we will need to assess proposals.
- 1.2 It is important that we consider all applications in a clear and consistent manner. The information that we are seeking from applicants will help us to do this, and will also help to deter speculative and ill-justified proposals.

Background and Context

- 2.1 The loss of one hotel or guest house may not appear significant, but the cumulative effect is a cause for concern. Since the late 1980s a considerable number of establishments have been lost in the National Park. Holiday markets do however change over time, and we obviously don't want to try to hold on to outdated accommodation which no longer has the potential to attract visitors. Hotels and guest houses are, however, an important part of the tourism product we offer in Pembrokeshire. They also often make a significant contribution to the character of the settlements in the National Park. There is a need to therefore to ensure that only genuinely unviable stock is changed to other uses.
- 2.2 The context for this Supplementary Planning Guidance is set out in Technical Advice Note 13 (Tourism), 1997. This states that:
"The conversion of hotel stock to alternative uses can weaken a seaside town's ability to retain its resort status and this issue should be addressed in Development Plans for the area." However it goes on to advise *"care should be taken not to use the planning system to perpetuate outdated accommodation for which there is no longer a market demand"*.
- 2.3 Policy 39 'Loss of Hotels and Guest Houses' of the National Park Authority's Local Development Plan 2 (LDP2) allows only for the conversion of hotels and guest houses where continued use can be shown to be unviable or surplus to requirements.

Information required in support of a proposal for the loss of hotel or guest house

- 3.1 There are 3 criteria in Policy 39 Loss of Hotels and Guest Houses. The first of these relates to the potential continued use of the facility. The applicant must prove the potential for continued use of the facility has been shown to be unviable. To do this, applicants will need to show that a genuine marketing exercise has been undertaken prior to the submission of the application. At the end of any unsuccessful marketing period applicants will need to show that they have failed to dispose of the property despite having offered it to the market at the recommended price and having followed the recommended marketing strategy.
- 3.2 Planning applicants will need to provide the following information when making an application:
- a) Applicants shall submit an initial valuation of the business and premises, accompanied by a marketing_sales strategy to sell the business ~~as a going concern~~. The valuation should be based on the ~~present~~ use of the premises property as a hotel or guesthouse operated by a competent, experienced and able operator, and should not take into account any potential additional value that might be gained by converting the premises to an alternative use. The valuation would be prepared by a suitably qualified Chartered Surveyor prior to implementation of the marketing plan.
 - b) A written report prepared by the marketing-selling agent, who must be a Chartered Surveyor, will need to be submitted with the planning application. The report will need to include:
 - the actions taken during the marketing_sales period;
 - the level of any interest and or offers generated; and
 - confirmation that any changes in the property's market value during the marketing period were reflected by corresponding changes to the asking price in order to ensure that it remained realistically priced throughout.
 - Applications can also be supported by evidence to show what action has been taken to ensure the viability of the business.
 - c) Sound advertisement of the premises for customers is also important in today's competitive trading environment, and the Authority will need to see evidence that the applicant has taken positive and appropriate action to promote all aspects of the business.
- 3.3 As a safeguard, we the Authority may commission an independent valuation and or marketing_sales report at our own cost to affirm that the property has been marketed on realistic terms.
- 3.4 The second criterion of the policy requires that the overall demand for this type of accommodation during peak periods will continue to be met within the town/village/area. This will be done as follows:
- Establishments of similar grading within a given area will be identified;
 - The number of bedspaces provided by the application establishment will be calculated as a percentage of the total of those identified above;
 - Visit Wales statistics will be used to establish an average peak occupancy rate for that particular type of establishment;

- The percentage of bed spaces in the application premises will be compared with the occupancy rate to establish if need can continue to be met by the remaining providers.

3.5 The National Park Authority will consider any additional sound evidence provided by the applicant to meet this requirement.

3.6 The third criterion requires that there is no adverse effect on the appearance and intrinsic character of the resort, area or frontage. For this the National Park Authority will need to consider the effect that the loss of a hotel or guest house would have on the character of the locality. Both the individual and cumulative effects of proposals will be considered.

3.7 In considering if there will be an adverse effect, the National Park Authority will take into account changes, such as, alterations to the building itself, the prominence of the building in the locality and the contribution of the building on the vibrancy and atmosphere of the area.

3.8 If the premises has a role in meeting the needs of the community, for example a local public house or meeting place, the impact of the loss of these facilities will also be considered.

3.8 The proposal will of course also be considered against any other relevant policies in our Development Plan.

Useful Contacts

Officers welcome early discussion with prospective applicants for planning permission and will be pleased to offer further assistance and discuss any issues arising from this guidance.

For further information regarding this guidance please contact the Park Direction Team at

Pembrokeshire Coast National Park Authority,
Llanion Park,
Pembroke Dock.
SA72 6DY.
Tel 0845 345 7275
Fax: 01646 689076
devplans@pembrokeshirecoast.org.uk

For advice on making a planning application please contact

The Development Management Team
Pembrokeshire Coast National Park Authority,
Llanion Park,
Pembroke Dock.
SA72 6DY.

Tel. 0845 345 7275
Fax 01646 689076
dc@pembrokeshirecoast.org.uk



Seascape Character

Draft Supplementary Planning Guidance

PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY

Consultation: 26 October 2022

Adoption:

PEMBROKESHIRE COUNTY COUNCIL

Consultation: 5 December 2022

Adoption:

1. Introduction

New Paragraph: **What is Seascape:** In line with the European Landscape Convention, seascapes and marine environments should be considered as being included in the definition of landscape. The UK Marine Policy Statement (2011) (from which the Welsh Marine Plan derives) indicates that:

'Seascape

2.6.5.1 The effects of activities and developments in the marine and coastal area on the landscape, including seascape, will vary on a case-by-case basis according to the type of activity, its location and its setting. There is no legal definition for seascape in the UK but the European Landscape Convention (ELC) defines landscape as "an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors". In the context of this document, references to seascape should be taken as meaning landscapes with views of the coast or seas, and coasts and the adjacent marine environment with cultural, historical and archaeological links with each other.'

- 1.1. **Local Development Plan Context:** This document forms the basis for updated supplementary planning guidance and provides more detailed guidance on the way in which the Local Development Plan policies (in particular, Policy 8 Special Qualities and Policy 14 Conservation of the Pembrokeshire Coast National Park) are applied and Policies GN.1 (General Development Policy), GN.2 (Sustainable Design, GN.34 (Protection and Creation of Outdoor Recreation Areas), GN.35 (Protection of Outdoor Spaces with Amenity Value), GN.36 (Green Wedges) and GN.38 (Protection and Enhancement of the Historic Environment) of the Pembrokeshire County Council Local Development Plan. Pembrokeshire County Council also notes the complementarity between these policies and GN.37 on Protection and Enhancement of Biodiversity. Paragraph 6.5.4, of Planning Policy Wales advises that local planning authorities need to consider both landward and seaward pressures and the impacts of these pressures. The impacts associated with such activities can be widespread and overlap between sea and coastline. They may relate to inappropriate land use, pressure for services and facilities, and impact on existing businesses and employment as well as the natural and historic character of the coastline and seascape where there is extensive inter-visibility between land and sea along the coastline.
- 1.2 The original version of this document (Seascape Character Assessment 1) covered the whole of the Pembrokeshire Coast but was only adopted by the Pembrokeshire Coast National Park Authority as Supplementary Planning Guidance.
- 1.3. Whilst only the policies in the development plan have special status in deciding planning applications, (i.e. for the purpose of any determination under the Planning Acts, the determination must be made in accordance with the Plan unless material considerations indicate otherwise), Supplementary Planning Guidance may be taken into account as a material planning consideration. In making decisions on matters that come before it, the Welsh Government and the Planning Inspectorate will give substantial weight to approved supplementary planning guidance which derives out of and has been prepared consistent with the approach set out in national policy on the preparation of Local Development Plans. Put simply, the requirements of the legislation mean that the following needs to be taken into account when considering a proposal:
 - Whether the proposal meets the requirements of policies within the Development Plan; and

- Weighing up all the other planning considerations to see whether they outweigh the conclusion of the Development Plan.

Relevance to local communities – This guidance describes in detail the various aspects of coastal character (physical, natural, historical, cultural) and the coastal experience. It also describes how each character area can be sensitive to change. Community / town / City councils may wish to draw on the guidance to highlight material considerations in any response they may make regarding planning applications, in terms of conservation and enhancement of local seascape character and the benefits to communities which derive from it. Councils may also find it helpful to refer to the guidance in any projects they may be involved with.

- 1.4. **Area covered:** The seascape character assessment of Pembrokeshire includes inshore territorial waters up to 12 nautical miles from the coast and extends from Cardigan Island in the north to the Taf estuary in Carmarthen Bay in the south. The study area reaches inland to include the areas of the Milford Haven Waterway outside the Park, and up to the tidal limits of the Daugleddau (designated an Area of Special Conservation).
- 1.5. **National and Regional Seascape Studies:** The study is at a local level and was originally set within the framework of the regional Welsh Seascapes study completed by Countryside Council for Wales (whose functions have since been assumed by Natural Resources Wales) in 2009. The Welsh Seascapes study was superseded by the National Seascape Assessment for Wales in 2015.¹ The method for this study builds on current guidance and tailored to apply to Pembrokeshire and the study's location in Wales. It was the first local seascape study of its kind in Wales. There is an emphasis on an assessment of the coastal landscape's seascape character in its marine setting, although wholly marine areas away from the coast are covered. As it was one of the pilot studies for all-Wales work there has been some further refinement, such as to boundaries, in order to marry up with the adjacent seascape character assessment for Carmarthen Bay, Gower and Swansea Bay²
- 1.6. **National Park Management Plan:** The supplementary planning guidance should also be read in conjunction with the National Park Management Plan and with other guidance and baseline information including the National Park Authority's Landscape Character Assessment (2011), rolled over for Local Development Plan 2. It should also be read in conjunction with the Policies of Pembrokeshire County Council's adopted Local Development Plan (LDP 1), as referred to in paragraph 1.1.
- 1.7. **National Policy:** At a national level, the Marine and Coastal Access Act 2009 requires the Welsh Government to develop a spatial planning approach to the management of its marine areas and the study may help to inform this. The Wales National Marine Plan (2019) aims to support the shared UK vision of clean, healthy, safe, productive and biologically diverse oceans and seas and must be considered by relevant public authorities when making decisions which have the potential to affect the plan area (from mean high water spring tide mark out to 200 nautical miles).
- 1.8. The Wales National Marine Plan contains policies to inform decisions taken by public authorities. The plan indicates that landscapes within coastal and marine

¹ National Seascape Assessment for Wales, NRW Evidence Report No 80, November 2015.

² Carmarthen Bay, Gower and Swansea Bay Local Seascape Character Assessment, City of Swansea at al, November 2017.

areas are known as seascapes and include 'landscapes with views of the coast or seas, and coasts and the adjacent marine environment with cultural, historical and archaeological links with each other'. Policy SOC_07: Seascapes sets out how proposals should demonstrate how potential impacts on seascapes have been taken into consideration. Opportunities to enhance seascapes are encouraged. The relative value of seascapes should be considered as part of decision-making and national Marine Character Areas covering the Inshore area are illustrated. Designated landscapes are recognised, including Pembrokeshire as the U.K.'s only fully coastal National Park. These are recognised as dramatic, scenic areas and particularly valued by society. ~~Policy SOC_06: Designated landscapes, sets out how proposals should demonstrate potential impacts on the purposes and special qualities of National Parks.~~ Policy SOC 06: Designated landscapes, requires proposals to demonstrate how potential impacts on the purposes and special qualities of National Parks have been taken into consideration. Regarding Designated Landscapes and Seascapes, both Policies SOC 06 and SOC 07 require proposals to a) avoid adverse impacts, b) where they cannot be avoided, minimised and c) where they cannot be minimised, mitigated.

New Paragraph: This SPG meets the requirement for the Authorities to: • clearly establish what the coast means for them, reflecting the characteristics of their coastlines (paragraph 6.5.6 of Planning Policy Wales Edition 11), and, • providing evidence on the natural beauty and special qualities of the PCNP, which they will have regard to in exercising their functions (paragraph 6.3.5 of Planning Policy Wales Edition 11).

New Paragraph: Future Wales: The National Plan 2040 is also relevant. Policy 32 – Haven Waterway and Energy highlights potential seascape impacts of energy proposals in the waterway.

- 1.9. **Approach Taken:** This supplementary planning guidance explains the method, gives an overview of the seascape, sets out the cultural benefits and services, the forces for change and the key sensitivities. Each seascape character area is described in turn.
- 1.10. The inland boundary of the study area is defined by identifying those areas of coast which have the highest intervisibility with the sea or water body in the case of the Milford Haven Waterway and the Daugleddau.
- 1.11. A large number of datasets have been analysed to inform the study. The process followed is to define seascape character types as 'building blocks' and then define and describe seascape character areas based on these types. Site visits have helped to verify desk-based work and describe perceptual and experiential qualities.
- 1.12. The seascape types are defined as marine, intertidal and terrestrial. Twenty-one marine types are defined based on physical characteristics of bathymetry, sea bed sediments and bedrock, and wave climate. Five intertidal types are based on rock, sand/shingle, mud, saltmarsh and biogenic reefs habitats. Twenty-one terrestrial types are defined based on coastal habitats such as sand dunes, 'inland' habitats close to the coast, such as mixed woodland and scrub and land uses such as different types of built up areas.
- 1.13. Forty-four seascape character areas are defined by bringing together related marine, intertidal and terrestrial types on the coast, and broadly similar marine types offshore. Each area is described in terms of its key characteristics, physical influences, cultural influences and aesthetic, perceptual and experiential qualities. Its cultural benefits and services and key sensitivities are defined and the main forces for change affecting the area discussed.
- 1.14. **Study Area:** The study area is on Great Britain's remote western seaboard facing and including parts of the Atlantic Ocean/Celtic Sea, St George's Channel, Cardigan

Bay and the Bristol Channel. The sea and coast are exposed to, and often governed by, the prevailing south westerlies. The maritime weather conditions combined with the depth of the sea and nature of the sea bed essentially define the character of the marine areas. The remote and exposed islands and islets with associated reefs and isolated lighthouses are key features of the Pembrokeshire seascape. The coast's distinctive and varied rock formations interact with the force of the sea and weather to create a wide range of dramatic coastal seascapes. Inland, the Milford Haven Waterway and Daugleddau provide contrasting sheltered seascapes, penetrating deep into Pembrokeshire's countryside.

- 1.15. Seascape character is enhanced by diverse marine and coastal habitats and wildlife of international and national importance including cetaceans e.g. dolphins and coastal birds e.g. puffins and choughs. Prehistoric promontory forts, more recent military installations, religious buildings, harbours and other historic features and wrecks indicate the area's strong connection to ancient seaways and reinforce its strong sense of place.
- 1.16. The area's qualities attract tourism and leisure pursuits, which make an important contribution to the local economy and character, but can also lead to pressures on the coast and sea. The energy and related industry, both carbon based e.g. liquid natural gas, and developing renewables, are further forces for change with potentially strong influences on character. Traditional uses such as fishing, particularly potting, still contribute to the local economy and character.
- 1.17. **Structure of the Guidance:** The report is structured to first to explain the method used (2.0), to go on to give an overview of the seascape of Pembrokeshire (3.0), to set out the cultural benefits and services of the seascape (4.0), the forces for change (5.0) and the sensitivities (6.0). Then, each seascape character area is described in turn (8.0). The appendices deal with the information and approach underpinning the study- the data available and used, seascape character typology, and background information relating to cultural benefits and services, forces for change and factors influencing the sensitivity of seascape, aesthetic and perceptual factors and a glossary.
- 1.18. The study area is indicated on **Figure 1**. The method for deriving the landward boundary is explained in the method.



St Justinians from Ramsey Sound

How to use the Guidance

- 1.19. This seascape character assessment is a tool for the management of change in the coastal and marine environment and it is equivalent to, and overlaps the landscape character assessment for the National Park.
- 1.20. Whilst there is a spatial overlap at the coast, the information it provides complements the land-based assessments as it focuses on marine and coastal character, rather than the landscape, and importantly, the document explores the relationship between land and sea.
- 1.21. The document should be referred, in particular alongside Policy 1, Policy 8 and Policy 14 of the Pembrokeshire Coast National Park Local Development Plan and Policies GN.1 (in particular criterion 3), GN.2 (in particular criterion 2), GN.34, GN.35, GN.36 and GN. 38 of Pembrokeshire County Council's Adopted Local Development Plan (LDP 1), also noting the synergies between these policies and GN.37 on Protection and Enhancement of Biodiversity.
- 1.22. The relevant Seascape Character Area assessments should be read in full and considered within the context of the main report. The assessment integrates natural and cultural considerations and includes an understanding of how places are experienced and perceived by people. The study identifies the key elements, features and characteristics that come together to create the intrinsic sense of place and character of a given Seascape Character Area.
- 1.23. The study area includes both undeveloped and developed coast. The study is therefore highly relevant to both of the National Park coastal Centre's planning policy (Policies 2 to 6) as well as landscape/seascape conservation and to various policies in Pembrokeshire County Council's adopted Local Development Plan (LDP 1), referenced above.
- 1.24. The assessment provides baseline spatial evidence at a local scale. It complements the strategic level National Seascape Assessment for Wales which identified 29 Marine Character Areas (MCAs) to inform the Wales Marine Plan. Ten of the Marine Character Areas relate to this study area, so compared to the forty four identified in the study, there is a significant difference in grain of spatial definition. The Marine Character Areas also only cover the marine area up to the high water mark. Therefore, this local seascape assessment makes a stronger link with the coast and hinterland at a finer grain, and is therefore useful for a wider range of applications.
- 1.25. Areas where seascape character should be taken into account are:
- Within a Seascape Character Area
 - Areas adjoining a Seascape Character Area where there may be indirect linkage
 - Areas where an existing or proposed structure would be intervisible with a Seascape Character Area due to height above ground or above sea level.
- 1.26. In line with the European Landscape Convention, seascapes and marine environments should be considered as being included in the definition of landscape. The UK Marine Policy Statement (2011) (from which the Welsh Marine Plan derives) indicates that:

'Seascape

2.6.5.1 The effects of activities and developments in the marine and coastal area on the landscape, including seascape, will vary on a case-by-case basis according to the type of activity, its location and its setting. There is no legal definition for seascape in the UK but the European Landscape Convention (ELC) defines landscape as “an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors”. In the context of this document, references to seascape should be taken as meaning landscapes with views of the coast or seas, and coasts and the adjacent marine environment with cultural, historical and archaeological links with each other.’

- 1.27. Local Development Plans only apply to the land within a local planning authority (LPA) boundaries down to the mean low water mark. There is one exception to this in Pembrokeshire³. However, Planning Policy Wales states that local plans and policies needs to consider landward and seaward pressures and related impacts on the coast.⁴
- 1.28. Seaward pressures may include waste disposal, sea fishing, increased leisure sailing, dredging of navigable channels, watersports and bathing, marine aggregate extraction, or tidal and wave power generation. Although offshore wind generation is not listed specifically in Planning Policy Wales, it is expected to be an increasingly strong seaward development pressure around the Pembrokeshire Coast.
- 1.29. Landward pressures may include major development on the coast, harbour works, leisure and recreational facilities, wind power generation and coastal defences.
- 1.30. Planning Policy Wales (Edition 11, February 2021) paragraph 6.5.9 advises ‘Development should not normally be proposed in coastal locations unless it needs to be on the coast. In particular, undeveloped coastal areas will rarely be the most appropriate location for development. Where new development requires a coastal location, developed coastal areas will normally provided the best option, provided that issues associated with coastal change have been taken into account.’ ~~Policies should aim to protect or enhance the character and landscape of the undeveloped coastline. Although this designation does not affect the status of the area in planning terms, the features which contribute to its designation are important in formulating policies.~~ The seascape character assessment can assist in better describing the qualities of the coastal areas. Coastal locations considered suitable or unsuitable for development, or subject to significant constraints are shown on the Proposals Map. The seascape character assessment provides part of the evidence base to inform these spatial policies.
- 1.31. Coastal Seascape Character Areas (SCAs) include the coastal strip within the National Park itself as well as the adjacent sea. These are clearly relevant to the National Park and its planning policies. In addition, the areas that are intervisible with the sea close to the coast as defined on the Seascape Character Area maps are also relevant in terms of coastal policies.
- 1.32. The Seascape Character Areas further offshore which are not directly connected to the coast are still relevant to consideration by policy as they contribute to the character of the open sea view from coastal areas.
- 1.33. The seascape character assessment considers forces for change in each Seascape Character Area. These pressures can be helpful in guiding planning policies, such as where the effects of development pressure are noticeable.

³ Local Planning Authority control extends to the mid-channel marker around Pembroke Dock.

⁴ Planning Policy Wales Edition 11, February 2021, 6.5 Coastal Areas

- 1.38. For marine developments themselves, Local Planning Authorities are not the decision-making authorities but are statutory consultees. The Planning Inspectorate Planning and Environment Decisions Wales (PEDW) deals with Developments of National Significance (DNS) on behalf of Welsh Government and Nationally Significant Infrastructure Projects on behalf of the UK government. Local Planning Authorities and Natural Resources Wales can suggest what information should be taken into account and this should include the local seascape character assessment as the most detailed marine spatial seascape assessment. LPAs can prepare Local Impact Reports (LIRs) setting out how they see the development affecting their area and Natural Resources Wales will also provide advice. The Seascape Character Assessment should inform such reports.
- 1.39. Overall, the seascape character assessment provides baseline evidence which can inform where and what type of development would be likely to be acceptable in terms of seascape, landscape and visual impact. The information is applicable to a wide range of scales of development - from individual dwellings on rural coastlines and structures such as lifeboat stations through to offshore developments. The level of detail required will depend on the scale and likely effect of any given development, and will be defined by the Local Planning Authority ~~as part of the screening and scoping process~~. The required output will range from a statement of likely effects on seascape character through to a full seascape, landscape and visual impact assessment (SLVIA or SVIA) as part of an environmental statement.
- 1.40. Seascape character needs to be considered where a proposed development lies within a Seascape Character Area or there is intervisibility between the development and Seascape Character Area/s. This may be defined by the use of computer-generated Zones of Theoretical Visibility (ZTVs) or by other means which provides robust and justifiable evidence.
- ~~1.41. Developers and their consultants then need to consider the effects on seascape character and how the design should respond to conserve or enhance the qualities of SCAs or at least to minimise the effects. As part of their assessment of effects on seascape character, developers and their consultants should describe how the proposals have responded to the key characteristics and qualities of the Seascape Character Areas. In doing so, they should have particular regard for the conservation and enhancement of those aspects which contribute to the Pembrokeshire Coast National Park's Special Qualities~~
- 1.42. The method for assessing the effects on seascape character are similar as assessing the effects on landscape character which are set out in the Guidelines for Landscape and Visual Impact Assessment (GLVIA) published by the Landscape Institute (see page 76 in the current Third Edition, 2013). It is suggested that the effects on individual seascape character areas are assessed in the same way as the effects on landscape character areas or LANDMAP aspect areas. Depending on the scale of development, there may be a case to subdivide Seascape Character ~~Assessments~~ Areas into smaller areas which may have slightly different characteristics (and potentially different level of effects). This would need to be done in line with the current seascape character assessment method.
- 1.43. It is important to emphasise that due to the openness and generally unspoilt character of the sea that the effects of marine development within it could have a substantial impact on surrounding areas intervisible with it. Similarly, development on areas of

coast or hinterland exposed to view from the sea has the potential for significant effects on the character and users of the sea, even if outside a Seascape Character Area. The effects not only include visual impact but also the effects on coastal processes which could more fundamentally change the character of an area. For example, a marine development may interrupt and change current sedimentation processes so that some parts of the coast are starved of sand while others may accumulate sand in greater quantities.

- 1.44. The seascape character assessment provides a list of factors that contribute or detract from sensitivity. These should be taken into consideration when defining a level of sensitivity for a given seascape character area in relation to a specific type of development.
- 1.45. The assessment lists key characteristics informed by detailed descriptions. It should be assessed if those key characteristics are removed or changed by the proposed development, or if the development itself would become a key characteristic. The greater the effect, the more likely it is to be significant. In considering the character of a Seascape Character Area and how development may affect it, the detailed descriptions should be fully taken into account as well as the key characteristics. If key characteristics change, or are lost, there would be significant consequences for the current character of the landscape/seascape.
- 1.46. Development should be assessed to see if it is in line or in conflict with policies relating to landscape/seascape character. The effect on National Park qualities and how they are conserved or enhanced should also be explored.
- 1.47. The developer should employ suitably qualified chartered landscape architects who are experienced in seascape assessment to carry out SLVIAs/SVIAs. Similarly, for larger scale developments, the local planning authorities may also be advised by suitably qualified specialists to ensure that the assessments are carried out in line with good practice and arrive at reasonable conclusions which can be relied on for decision-making.

- Seascape Characterisation around the English Coast (Marine Plan Areas 3 and 4 and Part of Area 6 Pilot Study) (NECR106), Natural England, 2012.
- An approach to seascape sensitivity assessment (MMO 1204), White Consultants, December 2019.

NRW evidence reports on seascape and visual sensitivity to offshore wind farms, which is structured between the following three reports:

- Stage 1 - The relationship between distance of offshore turbine away from a sensitive receptor and magnitude of visual effects
- Stage 2 - Offshore wind farm siting and design guidelines in relation to seascapes
- Stage 3 – Visual sensitivity of the marine settings of Wales’s Designated Landscapes to offshore wind farms

2.5. In terms of status, the Natural England 2012 approach is advisory but generally accepted for use in Wales.

2.6. The scale of the assessment is at local authority level. In Wales, there is the national seascape assessment above. In England, there are four levels with the most detailed/lowest level also named ‘local scale’. However, this addresses individual bays, coves or rocky coastlines. This is considered to be at a greater level of detail than required for this study and equates more with detailed Shoreline Management Plan areas on the coast.

2.7. Other guidance prepared primarily for landscape and visual assessment is also relevant to this study. It is important to ensure that terms and approaches to seascape are the same as for landscape insofar as the substantially different qualities of the two environments allow. Relevant publications to the updated guidance include:

- Skye and Lochalsh landscape assessment, Stanton, C. Scottish Natural Heritage Review No.71, 1996.
- Guidelines for Landscape and Visual Impact Assessment, third edition, Landscape Institute and Institute of Environmental Assessment, 2013.
- An Approach to Landscape Character Assessment, , Christine Tudor, Natural England, October 2014.
- An approach to landscape sensitivity assessment, Christine Tudor, Natural England, June 2019.
- The LANDMAP Information System, Countryside Council for Wales, March 2012.
- Assessing landscape value outside national designations, TGN 02-21, Landscape Institute, 2021.
- GN 017 Landscape Sensitivity Assessment Guidance for Wales, 2022.

2.8. The documents are referred to in the text and appendices as appropriate below.

Approach to collection of data and mapping

2.9. Data for the study was provided by the Countryside Council for Wales for the original study, Natural Resources Wales (for the current study), the National Park Authority (via Welsh Government) and Pembrokeshire Coastal Forum as defined in **Appendix A**. The data provided and suggested from other sources covers a very large range of information. Some of the data has been found to be essential for defining Seascape Character Types whilst other data has been useful in

3. Overview of the Pembrokeshire Seascape

- 3.1. Local Development Plan 2 provides a suitable introduction to the Pembrokeshire Coast National Park seascape stating that it:

'is widely recognised as Britain's only predominantly coastal National Park. The splendour of its coastline, the influence of the seascape, its spectacular scenery, and rugged, unspoilt beauty, provide a scenic quality which was recognised in its designation as a National Park along with the spectacle of the islands off the Pembrokeshire coast.' (4.56)

New Paragraph: The special qualities of the National Park are those characteristics and features of the National Park which individually or in combination contribute to making this National Park unique. (4.52 of the Pembrokeshire Coast National Park Local Development Plan 2)

Table 4 Special Qualities (Pembrokeshire Coast National Park Local Development Plan 2)

<u>Coastal splendour</u>	<u>Richness of habitats and biodiversity</u>
<u>Diverse geology</u>	<u>Islands</u>
<u>Diversity of landscape</u>	<u>Accessibility</u>
<u>Distinctive settlement character</u>	<u>Space to breathe</u>
<u>Rich historic environment</u>	<u>Remoteness, tranquillity and wildness</u>
<u>Cultural heritage</u>	<u>The diversity of experiences and combination of individual qualities</u>

Although there is no direct equivalent in Pembrokeshire County Council's adopted Local Development Plan (LDP 1), policy GN.1, criterion 3 refers to landscape character, quality and diversity, including the special qualities of the Pembrokeshire Coast National Park and neighbouring authorities. Policy GN.2 of the same Plan, criterion 2, refers to local character and landscape / townscape context.

- 3.2. The study area coastal boundary runs from Cardigan Island in Cardigan Bay to the north, to the Taf estuary area in Carmarthen Bay to the south. It is on Great Britain's remote western seaboard facing the Atlantic Ocean/Celtic Sea due west, St George's Channel to the north east, Cardigan Bay to the north, and Bristol Channel to the south east and east. The sea and coast are exposed to, and often governed by, the prevailing south westerlies. The area's resulting distinctive maritime climate means the weather is almost always different from that occurring further east in the UK. The area's distinctive and varied rock formations interact with the force of the sea and weather to create a wide range of dramatic seascapes.

Physical influences

GEOLOGY AND COASTAL FORM

5. Forces for change

- 5.1. Forces for change ~~have been considered in respect of how they affect the special qualities of the National Park.~~ They can be divided into natural processes and climate change, marine/water-based activity, coastal development and marine related activity and land management. A particular focus has been provided in terms of how forces for change affect the special qualities of the National Park.
- 5.2. Natural processes include erosion of coasts, sedimentation and flooding. Though climate change is likely to have significant effects in the long term in relation to sea level rise and changing weather patterns the study focuses mainly on the existing evident and or likely effects over the next ten years. Sea defences can radically change the character of the coast from natural to one dominated by manmade structures. Shoreline Management Plans are in place for the coastline and describe how a stretch of shoreline is likely to be managed to address flooding and / or erosion. Stretches of coast are divided into 'management units' where one of four different management policies are agreed;
- No active intervention: no planned investment in defending against flooding or erosion, whether or not an artificial defence has existed previously.
 - Hold the (existing defence) line: an aspiration to build or maintain artificial defences so that the position of the shoreline remains. Sometimes, the type or method of defence may change to achieve this result.
 - Managed realignment: allowing the shoreline to move naturally, but managing the process to direct it in certain areas. This is usually done in low-lying areas, but may occasionally apply to cliffs.
 - Advance the line: new defences are built on the seaward side.
- 5.3. The port of Milford is the UK's largest energy port and used by large tankers and other craft including ferries operating out of Pembroke Dock and Fishguard Harbour. The area is very popular for tourism and water-based activity is increasing with sailing and motor leisure boating with marinas and moorings also increasing capacity. There is also an increase in wildlife and boat trips, canoes and other craft. The emergence of potentially higher protection around proposed marine conservation areas such as Skomer may have implications as to recreational use and access. ~~One of the major tensions in~~
- 5.4. One of the major tensions in Pembrokeshire is the need to protect wildlife which flourish in the remote coastal waters, islands, cliffs and beaches whilst managing a variety of visitors who increasingly wish to enjoy and access these fragile areas potentially causing damage and disturbance. Offshore there is currently a lease for a demonstration wave energy scheme, early consideration of commercial floating wind energy in the Celtic Sea), landing of marine aggregates from the Bristol Channel at Pembroke Dockyard Wharf, and use for firing ranges and military training. Ramsey Sound has been explored for tidal energy. These activities can have physical effects such as pollution or disturbance of sensitive areas but can also disturb tranquillity and a sense of remoteness.
- New Paragraph: In terms of offshore renewable energy there are several potential projects (August 2023) to consider. The potential impacts on the Special Qualities of the Pembrokeshire Coast National Park and wider characteristics and qualities of the seascape areas requires careful assessment, particularly with regards to the potential impacts on perceptual and sensory qualities. Natural Resources Wales evidence reports on seascape and visual sensitivity to offshore wind farms will need to be considered as part of the relevant consenting regime. The Natural

Resources Wales reports specifically highlight the high sensitivity of the Pembrokeshire seascape to offshore wind.

New paragraph: The Seascape and Visual Sensitivity to Offshore Wind farms in Wales (Parts 1 to 3)⁷: This strategic assessment and guidance document sets out a desk-based assessment of the sensitivity of the Welsh Seascape for different heights of turbines up to 350m taking into account existing mapped areas such as National Parks and Areas of Outstanding Natural Beauty (AONBs) and seascape character areas. The aim is to avoid significant adverse effects on high sensitivity seascape receptors. The overall study focusses primarily on potential recommended buffers for National Parks and AONBs. (page 12, Part 3) The general conclusions are that the seascape of Wales is highly sensitive in many areas. Detail is provided on sensitivity to offshore wind farm development in different zones (starting page 14, Part 3) with specific reference to issues for Pembrokeshire also commented upon. Detail is also provided in the documentation regarding how the findings are caveated and how they should be treated when considering the visual impact of individual proposals.

New paragraph: In relation to offshore wind, it should be noted that this technology will also require other works which have the potential to impact on seascape character, including the construction of cable routes, landfall and transmission works, and the construction of substations, which collectively have both onshore and offshore implications’.

- 5.5. The coast-based infrastructure related to marine commercial activity is likely to continue to change. The Haven has seen the development of refineries, storage facilities, a power station and Liquefied Natural Gas along Milford Haven. Changing requirements for energy will require new facilities to research, assemble, test and service renewable energy schemes such as those being built in Pembroke Dock. Hydrogen technology is also currently being explored in the Haven. The chimneys and structures along the Haven are already widely visible in the Pembrokeshire. Onshore infrastructure for renewable energy installations may affect coastal character.
- 5.6. The Pembrokeshire Coast Path, once a stand-alone attraction, is now part of the Wales Coast Path which itself is very popular. This will potentially increase usage with attendant damage to the path structure through compaction and erosion. Coaststeering and climbing plus beach based activities are putting pressure on the coastal resource with associated infrastructure, disturbance, erosion, compaction and litter. Pressure is also increasing on the access points to the water for recreation.
- 5.7. Whilst the study concentrates on marine-related issues, the view along the coast, and its character, are partly defined by the management of landcover such as farmland. Changes to field boundaries with the removal of hedgebanks / replacement with fences and changes to intensity of management either with abandonment of fields or rough grazing or intensification from unimproved pasture to arable can have significant effects. The attractiveness of the area also leads to pressure for housing and tourist development and associated commercial

⁷ Stage 1 <https://cdn.naturalresources.wales/media/689503/eng-evidence-report-315-seascape-and-visual-sensitivity-to-offshore-wind-farms-in-wales.pdf> Report Number 315

Stage 2 <https://cdn.naturalresources.wales/media/689506/eng-evidence-report-330-seascape-and-visual-sensitivity-to-offshore-wind-farms-in-wales-copy.pdf> Report Number 330

Stage 3 <https://cdn.cyfoethnaturiol.cymru/media/689508/eng-evidence-report-331-seascape-and-visual-sensitivity-to-offshore-wind-farms-in-wales.pdf> Report Number 331

- The connections of the area with St David and Giraldus Cambrensis and other historical figures.
- 6.2. ~~These c~~ Characteristics and features are set out in ~~more detail~~ for each Seascape Character Area informed by the factors influencing susceptibility and value are summarised in **Appendix E**. This also sets out those factors which tend to detract from /susceptibility and value in some areas.

1. Appendix A Data and Sources

Pembrokeshire Seascape Character Assessment DATA SOURCES FOR BASELINE INFORMATION

Key datasets	Data Layers	Source	Projection	Source	Path
	Hydrospatial Chartered Rasters	Seazone	WGS84	NRW CCW	M:\GIS_Data\Live\Hydrographic\seazone_hydrospatial\data\Chartered Raster
	Hydrospatial Chartered Vector Features	Seazone	WGS84	NRW CCW	M:\GIS_Data\Live\Hydrographic\seazone_hydrospatial\data\hydrospatial\
	OS map - 1:250,000	Ordnance Survey	BNG	OS	https://www.ordnancesurvey.co.uk/business-government/tools-support/open-data-support
	OS map - 1:50,000	Ordnance Survey	BNG	NRW CCW	M:\GIS_Data\Live\Ordnance_Survey\OS50K
	OS map - 1:25,000	Ordnance Survey	BNG	NRW CCW	M:\GIS_Data\Live\Ordnance_Survey\OS25K
	Mean High Water	Ordnance Survey	BNG	NRW CCW	M:\GIS_Data\Live\Ordnance_Survey\OS_mastermap\wales_osmm_mhw
		Ordnance Survey	BNG	NRW CCW	M:\GIS_Data\Live\Ordnance_Survey\OS_boundaryline\hwm
	Mean Low Water	Ordnance	BNG	NRW CCW	M:\GIS_Data\Live\Ordnance_Survey\OS_mastermap\wales_osmm_mlw

Key datasets	Data Layers	Source	Projection	Source	Path
		Survey			
		Ordnance Survey	BNG	NRW CCW	M:\GIS_Data\Live\Ordnance_Survey\OS_boundaryline\mlw
	12 Nautical Mile Territorial Sea limit	Seazone	WGS84	NRW CCW	M:\GIS_Data\Live\Hydrographic\seazone_hydrospatial\data\hydrospatial\Welsh_12nm
		UKHO	BNG	NRW CCW	M:\GIS_Data\Live\Hydrographic\UKHO\UKHO_territorial_limits\lines\nm1_12_lines
		UKHO	BNG	NRW CCW	M:\GIS_Data\Live\Hydrographic\UKHO\UKHO_territorial_limits\polygons\nm1_12_polys
		UKHO	BNG	NRW CCW	M:\GIS_Data\Live\Hydrographic\UKHO\UKHO_territorial_limits\polygons\nm12_poly
	UK Continental Shelf Limit	Seazone	Lat/Long	NRW CCW	M:\GIS_Data\Live\Hydrographic\seazone_hydrospatial\data\hydrospatial
Key datasets	Data Layers	Source	Projection	Source	Path
	Renewable Energy Zone	Seazone	Lat/Long	NRW CCW	M:\GIS_Data\Live\Hydrographic\seazone_hydrospatial\data\hydrospatial
	Unitary Authority Boundaries	Ordnance Survey	BNG	NRW CCW	M:\GIS_Data\Live\Ordnance_Survey\OS_boundaryline\Unitary_Authority
	Harbour Limits	Seazone	Lat/Long	NRW CCW	M:\GIS_Data\Live\Hydrographic\seazone_hydrospatial\data\hydrospatial
	Shoreline Management Plan	Councils		Contractor	Web for detailed information. PCNPA for GIS polygons
	Coast Pilot	Yachting Monthly		Contractor	Reeds Almanac and local coast/sea user book obtained

Supplementary Planning Guidance: Seascape Character ~~2021-2023~~

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Key datasets	Data Layers	Source	Projection	Source	Path
	Ports	Seazone	Lat/Long	NRW CCW	M:\GIS_Data\Live\Hydrographic\seazone_hydrospatial\data\hydrospatial
	Character Assessment				
	Landscape Character Map for Wales	NRW CCW	BNG	NRW CCW	M:\GIS_Data\Live\Physical\Landscape_character\Landscape_Character_Areas_July09
	Regional Seascape Units	NRW CCW	BNG	NRW CCW	M:\GIS_Data\Live\Physical\Seascapes\Seascapes Units (FINAL June 2008)
	<u>National Seascape Assessment for Wales Evidence Report No: 80 November 2015.</u>	<u>NRW</u>		<u>NRW</u>	https://naturalresources.wales/evidence-and-data/research-and-reports/marine-reports/marine-and-coastal-evidence-reports/?lang=en
	LANDMAP aspects	NRW CCW	BNG	Download	Download from CCW Web site
	Pembrokeshire Coast National Park Landscape Character <u>Interim Supplementary Planning Guidance Local Development Plan 2</u>	PCNPA	BNG	PCNPA	PCNPA email https://www.pembrokeshirecoast.wales/planning/planning-policy/local-development-plan-2/supplementary-planning-guidance-ldp2/caravan-camping-and-chalet-supplementary-planning-guidance-interim/

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Key datasets	Data Layers	Source	Projection	Source	Path
	<u>September 2020</u>				
	AONB	NRW CCW	BNG	NRW CCW	Download from NRW CCW web site
	Natural Features				
	OS Landform Panorama	Ordnance Survey		Contractor	OS Open Data Contractor to Source
Key datasets	Data Layers	Source	Projection	Source	Path
	Seazone Bathymetry and Elevation	Seazone	Lat/Long	NRW CCW	M:\GIS_Data\Live\Hydrographic\seazone_hydrospatial\data\hydrospatial
		Seazone	Lat/Long	NRW CCW	M:\GIS_Data\Live\Hydrographic\seazone_hydrospatial\data\hydrospatial
	Wave Climate	NRW CCW	WGS83	NRW CCW	M:\GIS_Data\Live\Biological\Habitats\Marine\HABMAP
	LANDMAP Geological Landscapes	NRW CCW	BGN	Download	Download from NRW CCW web site
	LANDMAP Landscape Habitats	NRW CCW	BGN	Download	Download from NRW CCW web site
	DigMapGB-250	NRW CCW		Contractor	sourced separately- essential dataset
	DigBath (Digrock250 & DigSB250)250	NRW CCW		Contractor	sourced separately- essential dataset
	Hydrospatial	Seazone	Lat/Long	NRW CCW	M:\GIS_Data\Live\Hydrographic\seazone_hydrospatial\data\hydrospatial

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Key datasets	Data Layers	Source	Projection	Source	Path
	Climate and Oceanography				
	Intertidal Phase 1 Habitat Survey	NRW CCW	BNG	NRW CCW	M:\GIS_Data\Live\Biological\Habitats\Marine\phase1_intertidal
	Terrestrial Phase1 Habitat Survey	NRW CCW	BNG	NRW CCW	M:\GIS_Data\Live\Biological\Habitats\Terrestrial\phase_1
	UK SeaMap 2006 & 2010	JNCC		Contractor	Contractor to Source
	Tidal Flow	Renewable Energy Atlas		Contractor	Contractor to Source
	OS Base Maps	OS	BNG	NRW CCW	See Above
Key datasets	Data Layers	Source	Projection	Source	Path
	Cultural/Social Factors				
	Wrecks	CADW	BNG	NRW CCW	M:\GIS_Data\Live\Physical\historic_landscapes\CADW\CADW_Designated_Wrecks
	Marine Archaeological Sites	RCAHMMW		Contractor	Contractor sourced on web- Coflein and: https://datamap.gov.wales/layers/inspire-rcahmw:nmrw_martime_heritage_assets_bng_rcahmw
	Wrecks & Obstructions	Oceanwise	Lat/Long	Welsh Government	-

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Key datasets	Data Layers	Source	Projection	Source	Path
	Anchorage, Anchor Berths & bad weather Refuge	Seazone	Lat/Long	NRW CCW	M:\GIS_Data\Live\Hydrographic\seazone_hydrospatial\data\hydrospatial
	Buoys	Seazone	Lat/Long	NRW CCW	M:\GIS_Data\Live\Hydrographic\seazone_hydrospatial\data\hydrospatial
	Ferry Terminals	Seazone	Lat/Long	NRW CCW	M:\GIS_Data\Live\Hydrographic\seazone_hydrospatial\data\hydrospatial
	Fog Signals	Seazone	Lat/Long	NRW CCW	M:\GIS_Data\Live\Hydrographic\seazone_hydrospatial\data\hydrospatial
	Traffic separation Zones	Oceanwise	Lat/Long	Welsh Government	-
	Coastguard Stations	Seazone	Lat/Long	NRW CCW	M:\GIS_Data\Live\Hydrographic\seazone_hydrospatial\data\hydrospatial
	Wales Coast Path/Long Distance Walking Routes	Lle	BNG	Lle	http://lle.gov.wales/catalogue/item/WalesCoastalPath?lang=en
	Sailing Areas	RYA		Contractor	National dataset not sourced due to cost- hard copy used instead
	Cruising routes	RYA		Contractor	National dataset not sourced due to cost- hard copy used instead
Key datasets	Data Layers	Source	Projection	Source	Path
	Sailing Facilities	RYA		Contractor	National dataset not sourced due to cost- hard copy used instead
	Small Craft mooring sites	Seazone	Lat/Long	NRW CCW	M:\GIS_Data\Live\Hydrographic\seazone_hydrospatial\data\hydrospatial

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Key datasets	Data Layers	Source	Projection	Source	Path
	Tourism Sites	Pembrokeshire Coastal Forum		PCNPA	-
	Wales activity mapping (recreation and sport)	Pembrokeshire Coastal Forum		PCNPA	-
	Yacht Harbour & Marine Areas	Seazone	Lat/Long	NRW CCW	M:\GIS_Data\Live\Hydrographic\seazone_hydrospatial\data\hydrospatial
	MOD Areas	MOD	BNG	NRW CCW	M:\GIS_Data\Live\Land_Management\external_agency\ministry_of_defence
	Activity Licenses [MOD, wind, wave, dredging, oil, gas]	Oceanwise	Lat/Long	Welsh Government	-
	Infrastructure	Oceanwise	Lat/Long	Welsh Government	-
	Tidal Energy resource	UK Renewable Atlas		Contractor	Contractor to Source- not used
	Wave power Resource	UK Renewable Atlas		Contractor	Contractor to Source- not used
	Fisheries Atlas	Clare Eno, CCW			
	AONB	NRW CCW	BNG	Download	Download from NRW CCW web site

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Key datasets	Data Layers	Source	Projection	Source	Path
	LANDMAP Historic Landscape Aspect	NRW CCW	BNG	Download	Download from NRW CCW web site
	LANDMAP Cultural landscape Aspect	NRW CCW	BNG	Download	Download from NRW CCW web site
Key datasets	Data Layers	Source	Projection	Source	Path
	LANDMAP Visual and Sensory Aspect	NRW CCW	BNG	Download	Download from NRW CCW web site
	Conservation Areas			Contractor	Local authority
	Historic Parks & Gardens	CADW	BNG	NRW CCW	M:\GIS_Data\Live\Physical\historic_landscapes\CADW\Parks_&_gardens
	Listed Buildings	CADW	BNG	NRW CCW	M:\GIS_Data\Live\Physical\historic_landscapes\CADW>Listed_Buildings
	Protected Wreck Sites	CADW	BNG	NRW CCW	M:\GIS_Data\Live\Physical\historic_landscapes\CADW\CADW_Designated_Wrecks
	Scheduled Monuments	CADW	BNG	NRW CCW	M:\GIS_Data\Live\Physical\historic_landscapes\CADW\Scheduled_Ancient_Monuments
	Historic landscape Areas	CADW	BNG	NRW CCW	M:\GIS_Data\Live\Physical\historic_landscapes\CADW\historic_landscapes
	Special Areas of Conservation SACs	NRW	BNG	Download	https://datamap.gov.wales/layers/inspire-nrw:NRW_SAC
	Special Protection Areas SPAs	NRW	BNG	Download	https://datamap.gov.wales/layers/inspire-nrw:NRW_SPA
	Marine Conservation Zones	NRW	BNG	Download	https://data.gov.uk/dataset/29b7f8da-3e10-4004-ba46-feeb61599bfe/marine-conservation-zones-mcz
	National Nature	NRW	BNG	Download	https://lle.gov.wales/catalogue/item/ProtectedSitesNationalNatureReserves/?lang=en

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Key datasets	Data Layers	Source	Projection	Source	Path
	Reserves NNRs				
	Ramsar Sites	NRW	BNG	Download	https://datamap.gov.wales/layers/inspire-nrw:NRW_RAM SAR
	RSPB Reserves	RSPB	BNG	NRW CCW	M:\GIS_Data\Live\Land_Management\external_agency\rspb_reserves
	Important Bird Areas	RSPB	BNG	NRW CCW	M:\GIS_Data\Live\Biological\Species\all_wales\Terrestrial\RSPB
	Important Bird Areas				Also download from the NBN Gateway
	Dark Skies			Contractor	LUC
	Wave Climate	NRW CCW	WGS83	NRW CCW	LUC
Key datasets	Data Layers	Source	Projection	Source	Path
	Land with Sea Views	NRW CCW	BNG	NRW CCW	M:\GIS_Data\Live\Physical\Seascapes\Land with sea views
	Sea Surface Visibility	NRW CCW	BNG	NRW CCW	M:\GIS_Data\Live\Physical\Seascapes\Seascapes relative visibility of the sea 0-24km from coastline
	Tranquil Areas	NRW CCW	BNG	NRW CCW	M:\GIS_Data\Live\Physical\Tranquil_Areas

Key

Yellow = CCW supplied

Orange = download from ~~CCW~~ /NRW/Lle/DatamapWales website

Orange- ~~NRW (formerly CCW)~~ supplied separately

Blue = contractor sourced if

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Key datasets	Data Layers	Source	Projection	Source	Path
	necessary				
	light green= received from client [PCNPA] and third parties- LUC, CPRE				
	Red- cost prohibitive, pdf mapping obtained. Helpful if NRW obtained GIS dataset				
	Dark green- information obtained at a cost				

Note: Some data (with associated sources) have been updated as part of the 2021 review (highlighted). Other data remain valid and original sources have been retained in the table although these may have changed.

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4. Appendix D Forces for change

4.1. The seascape of Pembrokeshire is undergoing change through a number of natural and man-related forces. These forces for change are explored and defined to ensure consistent use and to avoid repetition in the individual SCA descriptions.

4.2. ~~The National Park Management Plan notes the ways of 'particular significance' in which the appearance and integrity of the landscape may be under threat:~~

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- ~~Climate change and responses to it~~

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- ~~The UK's National Security Strategy (March 2008) cites climate change and competition for energy as key challenges, and also makes reference to security of food and water supplies, the longer term impact of climate change from habitat fragmentation and environmental degradation to energy hungry food production and fuel poverty.~~
- ~~Climate change may, specifically, put pressure on wildlife and marine fish populations as well as coastal scenery.~~
- ~~It may also affect farming, particularly in terms of crop suitability, growing seasons, availability of drinking water and shade, effects on livestock, and losses to soils (and consequent soil run off to water courses) and trees or hedgerows~~
- ~~Some areas may become inaccessible due to flooding or instability, including coastal paths or recreational areas.~~
- ~~Land management practices, which have particular implications for semi natural habitat and its wildlife, and for management of natural stocks and flows, such as soils and water. Traditional farming practices, such as extensive grazing, are critical contributors to the character of the landscape, yet farming continues to suffer an uncertain future with an aging farming population and more part time farmers, with barely viable businesses. Farming is also very vulnerable to fuel price changes and consequent cost of input materials such as fertiliser and feed.~~
- ~~Development the National Park has a very limited landscape capacity for development in general and for housing in particular. Development proposals must be considered against the special qualities listed at para 4.56 of the Pembrokeshire Coast Local Development Plan (to 2021): LDP Strategy Policy 8 and Policy 15 in particular apply.~~

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4.3. ~~The National Park Management Plan notes that factors particularly likely to affect remoteness and tranquillity in the National Park are:~~

- ~~visible development or intensive land use,~~
- ~~traffic noise,~~
- ~~light,~~
- ~~intrusive noise from recreational activity,~~
- ~~firing on the ranges,~~
- ~~waste and litter, and~~
- ~~activity arising from mineral and aggregate workings.~~

4.4. Tourism and recreational use of the National Park, whilst one of its core functions, can also have significant impacts, such as erosion of paths, effects of parking and road access, noise from power craft in particular, and impacts on fauna. The Pembrokeshire Coastal Forum are working to ensure that adventure activities such as coasteering, kayaking and cliff climbing, do not impact on the environments and wildlife of Pembrokeshire

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5. Appendix E Sensitivity of seascape character areas

5.1. We acknowledge that sensitivity should be considered within the framework of ‘An approach to seascape sensitivity assessment’ (MMO 1204), White Consultants, December 2019 and related landscape sensitivity guidance. ~~Though the original brief stated that the inherent sensitivity of an SCA should be addressed, it also mentioned that the study needed to explore sensitivity to different types of development. We therefore examine the different characteristics of SCAs and where they may be more or less sensitive to development- see Table E1. This table acts as the framework for discussion of sensitivity to relevant forces for change for each SCA. While the approach in this Supplementary Planning Guidance draws on the advice referenced, as well as guidance published by Natural Resources Wales, the Authorities have found in the past that there is overlap between ‘susceptibility’ and ‘value’ indicators and therefore a set of sensitivity criteria is used that considers aspects of both. It is considered that this is an appropriate approach for this Guidance, which has a strategic purpose, in contrast to more site-specific assessments, such as Landscape and Visual Impact Assessments.~~

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New paragraph: Please note that given the wide range of development types/or potential change in seascape locations this guidance does not contain a fuller sensitivity assessment which would have provided an assessment on levels of sensitivity for different forms of development for each character area. Instead, the study focuses on highlighting factors or indicators likely to affect sensitivity when considering proposals.

- 5.2. The latest guidance indicates that sensitivity is now a term that is applied to a specific type of development, not inherent sensitivity. The MMO document has the following definitions:
- Seascape character sensitivity is a term applied to marine character and seascape and the associated visual resource, combining judgements of their susceptibility to a specific type of development / development scenario or other change being considered and the value(s) related to that seascape, marine character and visual resource.
 - Seascape character susceptibility is defined as the degree to which a defined seascape character area and its associated visual qualities and attributes might respond to the specified types of development or change without undue negative effects on character and the visual resource.
 - Seascape character value is defined as the relative value or importance attached to a seascape character area, which may express national or local consensus, because of its quality, its special qualities including perceptual aspects such as scenic beauty, tranquillity and wildness, natural or historic attributes or features, cultural associations, or its relationship with designated or valued landscapes and coasts.
- 5.3. Therefore, some key factors which should be taken into account when assessing the susceptibility of a seascape character area to a type of development and those that relate to value have been set out for each area guided by the table below. Landscape, biodiversity and heritage designations assets also contribute to value.

Table E1: Factors affecting the potential sensitivity of seascape character areas to change

Criteria	Factors contributing to potentially higher susceptibility and value	Factors contributing to potentially lower susceptibility and value
Heritage	Presence of wrecks and other submerged historic	Limited number or no

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Agricultural activities such as small scale livestock raising may become unprofitable, which could lead to a loss of pasture and hedgerow management.	Space to Breathe							
	Key			Change occurring in the area affecting the selected special quality				
Key factors to be taken into account when assessing sensitivity to change								
Factors contributing to potentially higher susceptibility and value				Factors contributing to potentially lower susceptibility and value				
<p>Remote, unspoilt rural landscape to the south west.</p> <p>Natural features of sinuous estuary and adjacent natural vegetation and habitats.</p> <p>Wild, dynamic character of estuary mouth.</p> <p>Historic character of settlements.</p> <p>Unspoilt, framed views out to sea.</p> <p>The views from higher ground are spectacular, with long views across the shallow valley and out to sea.</p> <p>Largely rural and undeveloped edge to the north contributing to scenic views across the water from the National Park.</p> <p>Coast Path as a receptor.</p> <p>Biodiversity, historic and landscape designations.</p> <p>Presence of established recreational use at Gwbert.</p> <p>High use of Poppit Sands and Gwbert as visitor hotspots.</p> <p>Housing and caravan park.</p> <p>B roads on both sides of estuary.</p>								

<p>Fishing in the area comprises of set nets, lobster and crab potting and there is potential for light otter trawling. The area has previously been granted a Round 24 Oil and Gas Licence and future applications may be made.</p>
<p>Aesthetic, perceptual and experiential qualities</p>
<p>This is a highly indented and rocky coastline which gives a great variety of vistas for users of the Coast Path who negotiate the exposed and open clifftops as well as the incised and sheltered valley mouths, harbours and coves. The sea is at a vast scale contrasting with the relatively small scale and fine grain of the coastal edge with rough textured jagged rocks.</p> <p>There are open unspoilt views out to sea with no discernible features and long views along the indented coast from the cliff tops as far as Strumble Head and Garn Fawr to the north east and Carn Llidi and St David's Head to the south west.</p> <p>Trefin as the only elevated settlement along the coast is a landmark from the sea. Light pollution is there limited with the light from Strumble Head the main source. The coast has a strong influence on the coastal waters, although the indentations apparent looking along the coast appear flattened at any distance from shore. The sea is exposed to westerlies and winds from the north. Some beaches such as Traeth Llyn at Ynys Barry which faces west are very exposed.</p> <p>The smells of seaweed and fishing pots are apparent at harbours such as Porthgain.</p> <p>The remains of quarrying and other small scale historical industry convey a strong sense of place especially apparent between and including Abereiddy and Porthgain with distinctive features like the harbour markers at the latter.</p> <p>The coast has a high degree of naturalness, a sense of tranquillity and wildness. In the evening the light from Strumble Head is apparent in the distance.</p>
<p>Cultural benefits and services</p>
<p>The area contributes significantly towards leisure and recreational services in the form of remote places to walk and appreciate nature, to natural heritage in the form of the rugged unspoilt coastline, and to cultural and spiritual services in respect of the sense of place related to industrial heritage, a sense of spaciousness and connection to nature.</p>

Forces for change								
Summary	Key forces for change							
<p>Slow erosion of rocky headlands, more in back of bays. Shoreline management plan states mostly 'do nothing' and locally 'hold the line' (e.g. Porthgain) or 'hold the line/retreat' (Abereiddi). There is little net longshore sediment drift.</p> <p>Proposed ICZM may limit the recreational use of Abercastle harbour.</p> <p>Visitor pressure at limited coastal access points such as Porthgain and Abereiddi including parking.</p> <p>Visitor use of Coast Path</p>	Special Qualities	Natural processes/ climate change	Visitor pressure	Marine use- commercial and fishing	Offshore energy or minerals	Development pressure	Land management changes	MOD use
	Coastal Splendour							
	Islands							
	Diversity of Landscape							
	Remoteness, Tranquillity and Wilderness							
	Diverse Geology							
	Richness of Habitats and Biodiversity							

the coast west to Milford Haven and Fishguard, across the Bristol Channel and to points east across Carmarthen Bay. There are also numerous routes across to Ireland. Kayaking continues around this coast. Sea angling from boats and the beach is present at Lydstep. Diving and snorkelling is popular just inside of Lydstep Point.

Other camp sites and caravan parks are present both close to the coast and in the hinterland. Climbing takes place on the limestone cliffs just to the west of Lydstep Point and to the west of Giltar Point which is also a popular spot for watching wildlife and views across the bay to Caldey Island. The Pembrokeshire Coast Path runs along the top of the cliff edge.

Fishing in the area comprises of hand gathered periwinkles, beach seining and beach nets, set nets, lobster and crab potting and there is potential for light otter trawling. The area is part of the Manorbier and Penally military practice areas.

Aesthetic, perceptual and experiential qualities

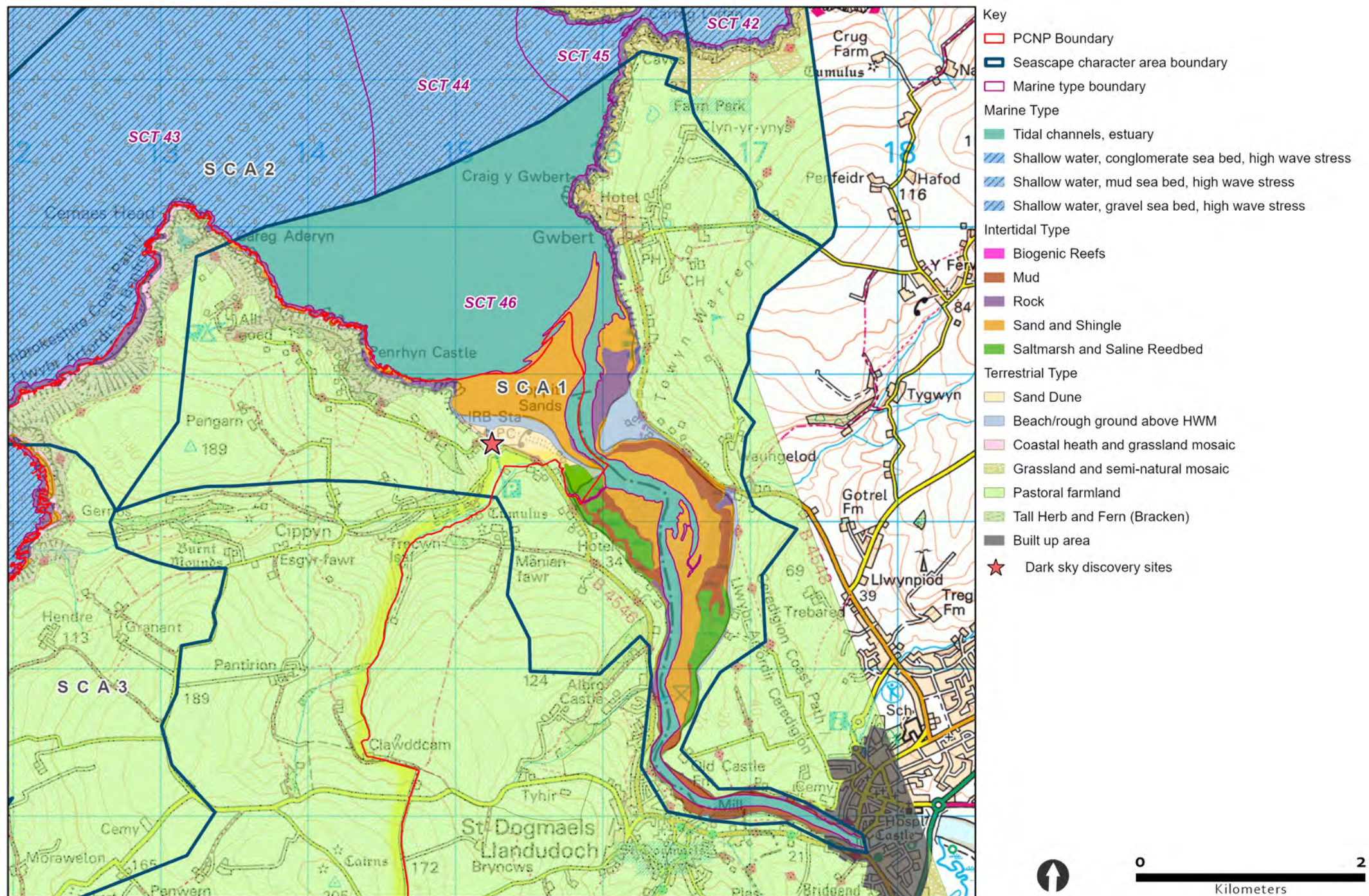
This coast has unity with consistently moderately high grey limestone cliffs at around 30m indented with one major sandy beach and small coves. The coast is a moderate to large scale with the headlands at Lydstep and Giltar Points. The limestone geology east of Skrinkle Haven is highly dramatic with sheer cliffs, arches such as the church door and caves. It feels moderately sheltered especially at Lydstep Haven. There is some diversity in the landcover with grassland, trees and scrub set against the cliffs and some sand dunes to the east. There are wide views from land out to an uninterrupted and unspoilt sea to the south and views to Caldey Island to the east, Lundy Island and the North Devon coast on clear days. Superb views are possible from Lydstep Point south and east **and St Margaret's Island forms a dramatic profile and interest in the seascape in views from the mainland coast.** From the water the most apparent features are Lydstep Point, Giltar Point, St Margarets Island and the caravan park at Lydstep. This is the only significant ~~intrusion development~~ in this coast appearing as an organised block and sweep of white static caravans climbing from the beach to the cliff tops albeit framed by surrounding woodland. Significant activity emanates from this resort development in season with the use of the bay of noisy power boats and jet skis ~~which reduce tranquillity on water and land.~~

The coast to the east is more tranquil due to footpath only access although trains and cars can probably be heard. The west coast of Caldey Island would be highly tranquil and feel remote. The small scale structures at Giltar Point and caravan parks inland are detractors but are not visible from the sea. There is a strong smell of the sea and the semi-natural grassland and rocky cliffs along the coast give a feeling of naturalness.

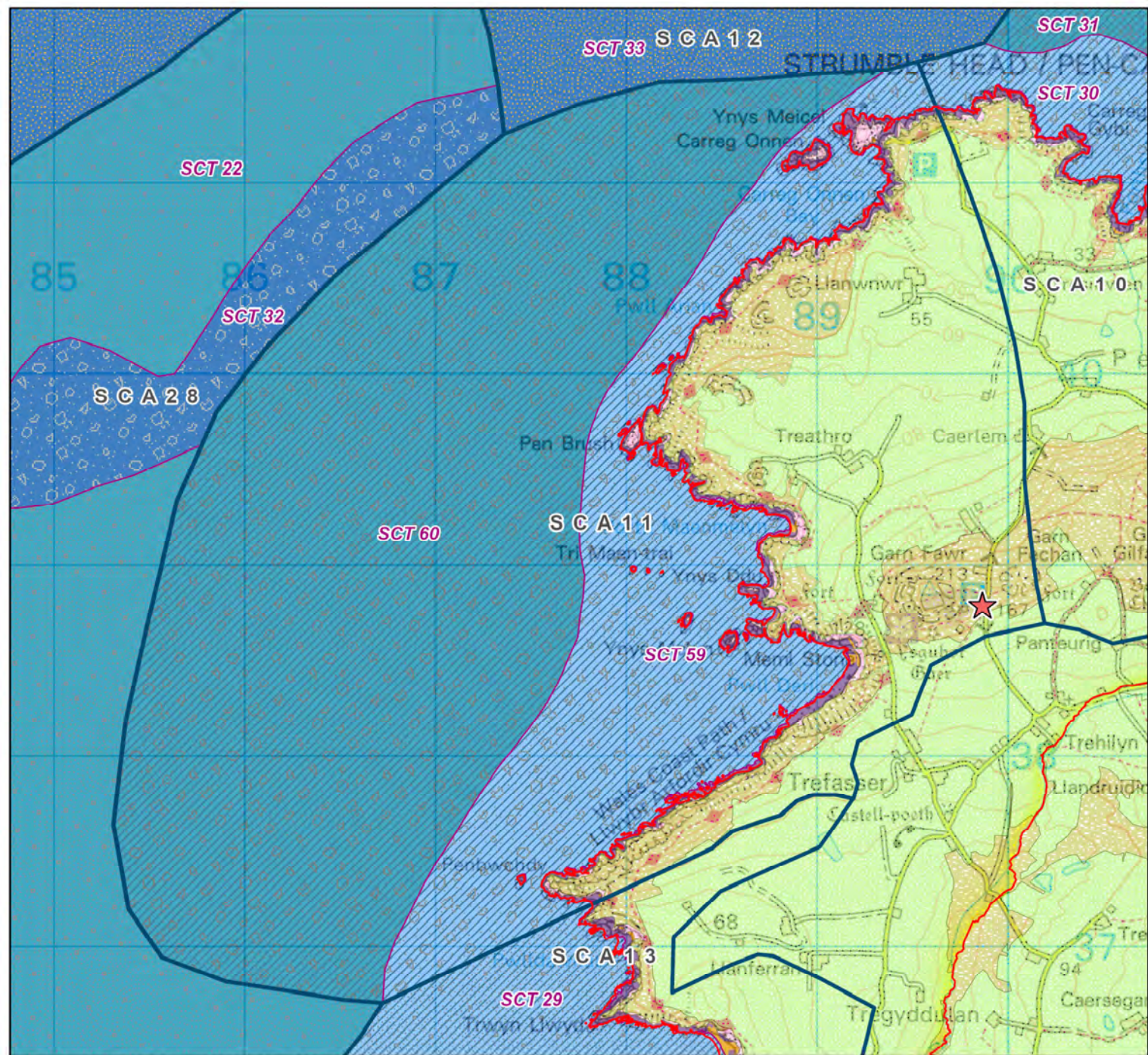
Cultural benefits and services

The area contributes significantly towards leisure and recreational services in the form of marine recreation and beach recreation, to natural heritage in the form of the unspoilt coast in parts and nature conservation interest, and to cultural and spiritual services in respect of historic features and connectedness with nature along this coast which is particularly spectacular around Lydstep Point and Caldey Island.

Forces for change								
Summary	Key forces for change							
<p>Slow coastal erosion of rocky cliffs. Sediment drift limited. The shoreline management plan generally states ‘do nothing’ but to ‘hold the line’ locally at Lydstep Haven.</p> <p><u>Caravan and camping developments.</u></p> <p>Caravan development with associated facilities at Lydstep Haven have increased over recent years.</p> <p>Intensive recreational use at Lydstep Haven including motor based marine recreation.</p> <p>Visitor pressure at Skrinkle Haven and Lydstep Point including wear at car park areas and the nearby accesses to the beach or cliffs and Coast Path.</p> <p>Use of the Coast Path including trampling of cliff top on limestone grassland.</p> <p>Apparent wear on cliffs through climbing (Lydstep Point).</p> <p>Change from pastoral to arable farming is leading to intensification with potential effects on character, pattern and nature conservation.</p> <p>Existing and future licences/leases for floating wave energy and offshore wind respectively in offshore areas could change the character of the area.</p>	Special Qualities	Natural processes/ climate change	Visitor pressure	Marine use- commercial and fishing	Offshore energy or minerals	Development pressure	Land management changes	MOD use
	Coastal Splendour							
	Islands							
	Diversity of Landscape							
	Remoteness, Tranquillity and Wilderness							
	Diverse Geology							
	Richness of Habitats and Biodiversity							
	Rich Archaeology							
	Distinctive Settlement Character							
	Cultural Heritage							
	Accessing the Park							
	Space to Breathe							
	Key		Change occurring in the area affecting the selected special quality					
Key factors to be taken into account when assessing sensitivity to change								
Factors contributing to potentially higher susceptibility and value				Factors contributing to potentially lower susceptibility and value				
Mainly rural south facing natural mainland coast with limestone cliffs with semi-natural grassland and pastoral coastal edge.				Presence of <u>Lydstep Haven Lydstep Beach Holiday Park</u> with associated large organised caravan park and facilities.				
Lydstep Point with dramatic vertically bedded cliffs and limestone grassland.				Presence of jet skis and water skiers reducing tranquillity.				



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 Sources: Ordnance Survey, Seazone, Pembrokeshire Coast National Park Authority, Natural Resources Wales



Key

- PCNP Boundary
- Seascape character area boundary
- Marine type boundary

Marine Type

- Shallow water, conglomerate sea bed, high wave stress
- Shallow water, gravel sea bed, high wave stress
- Medium depth water, gravel sea bed, low wave stress
- Medium depth water, conglomerate sea bed, high wave stress
- Deep water, sand sea bed, low wave stress
- Deep water, conglomerate sea bed, low wave stress

Intertidal Type

- Rock
- Sand and Shingle

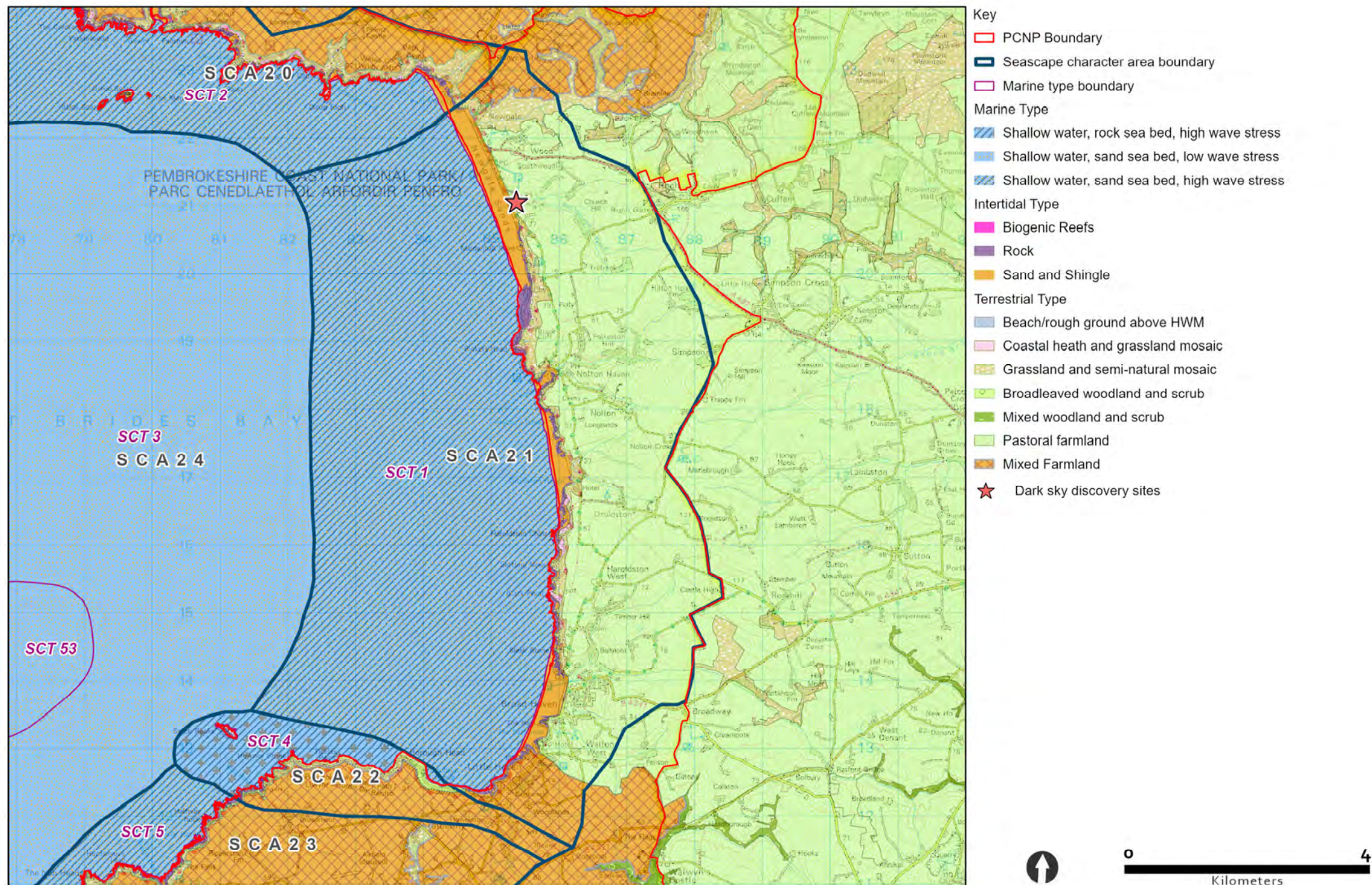
Terrestrial Type

- Coastal heath and grassland mosaic
- Grassland and semi-natural mosaic
- Pastoral farmland

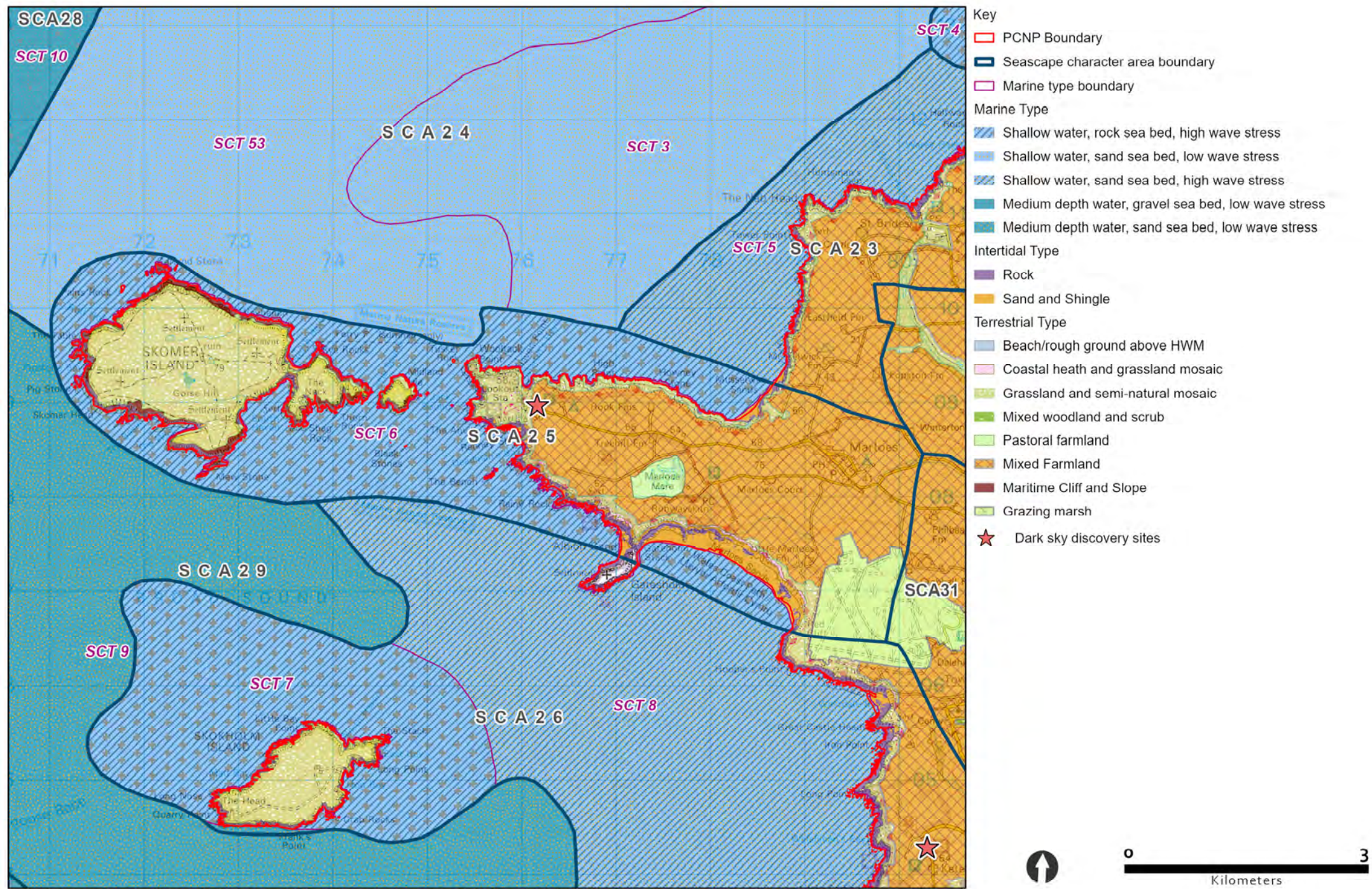
★ Dark sky discovery sites



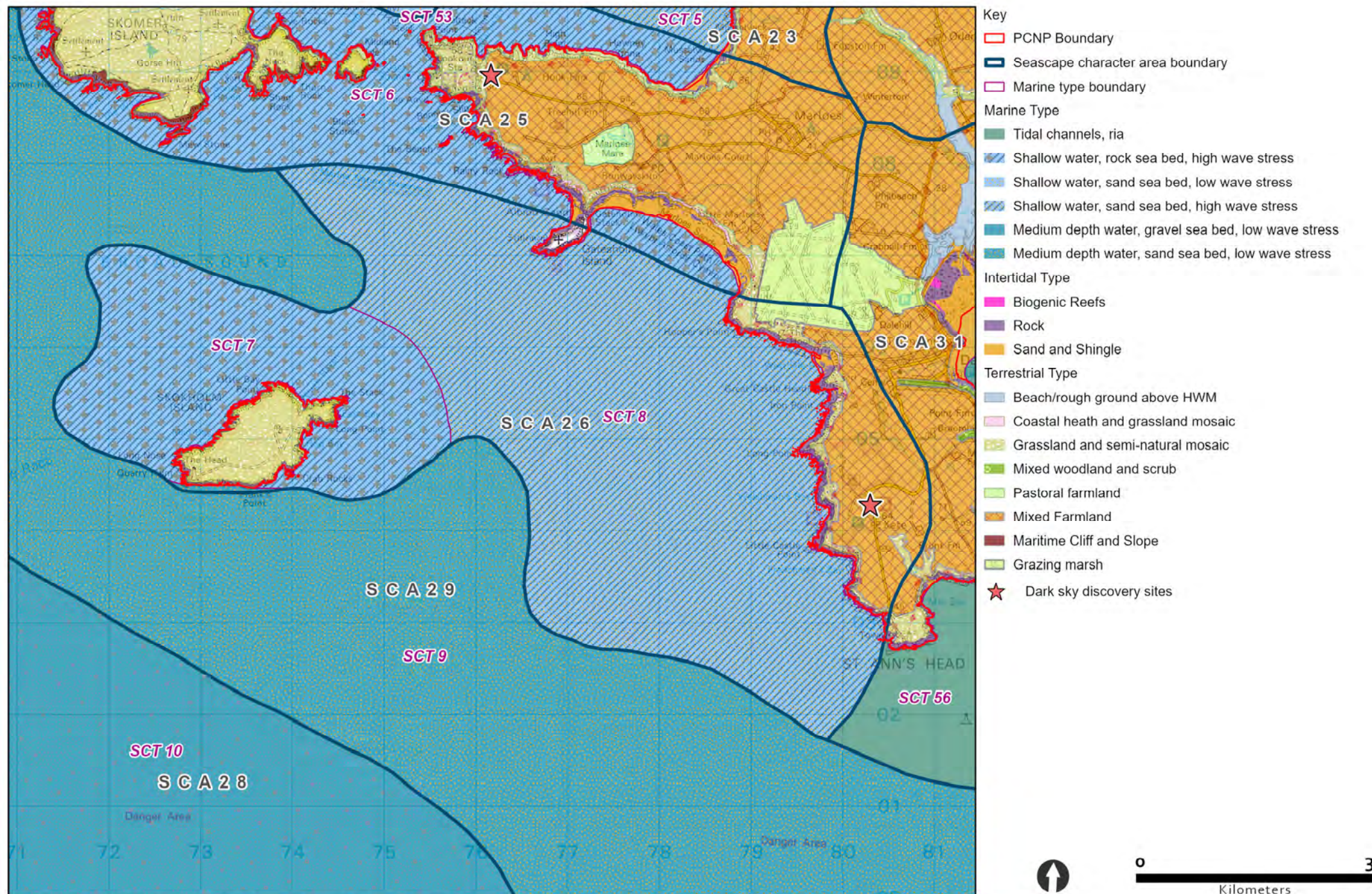
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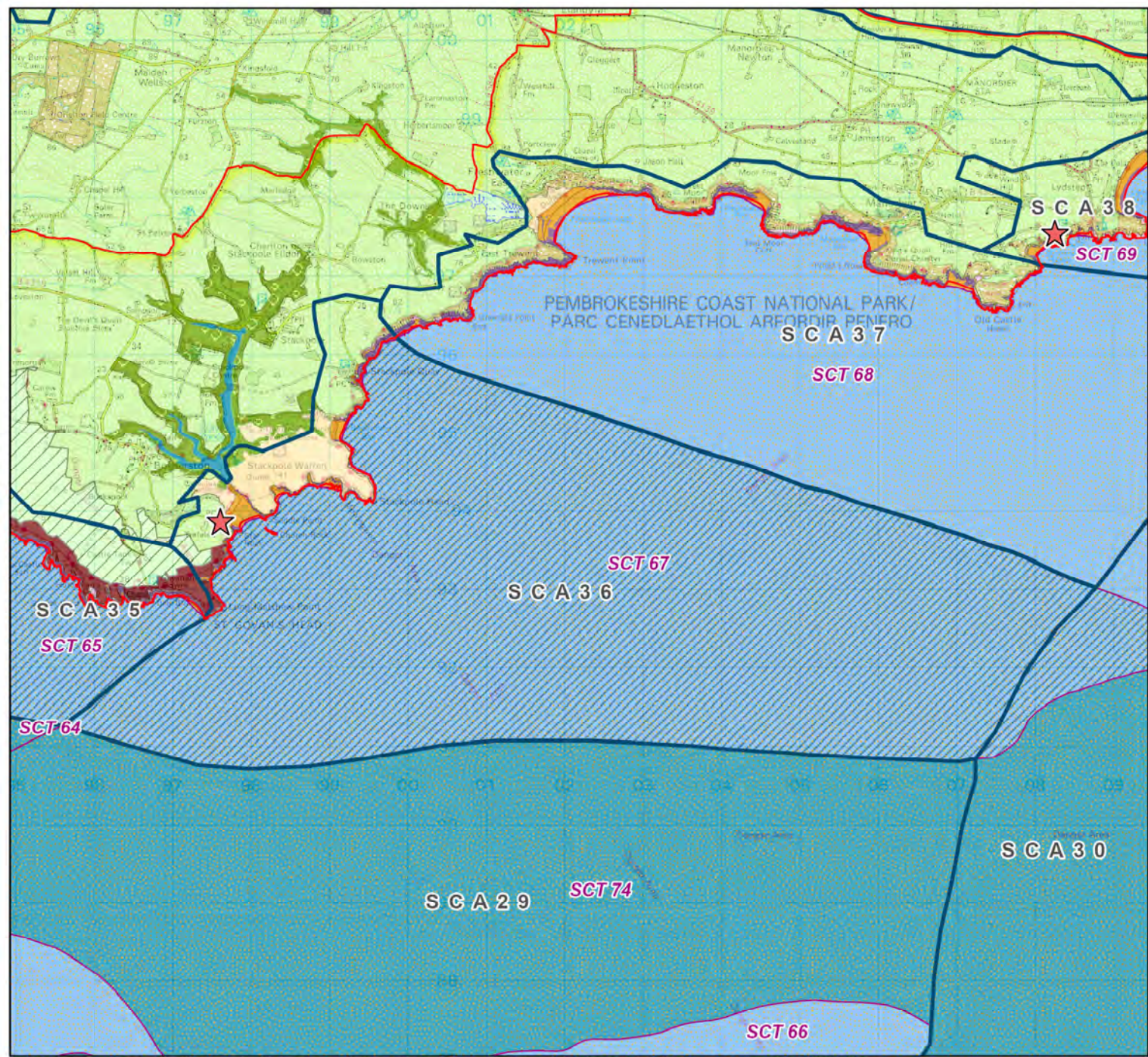


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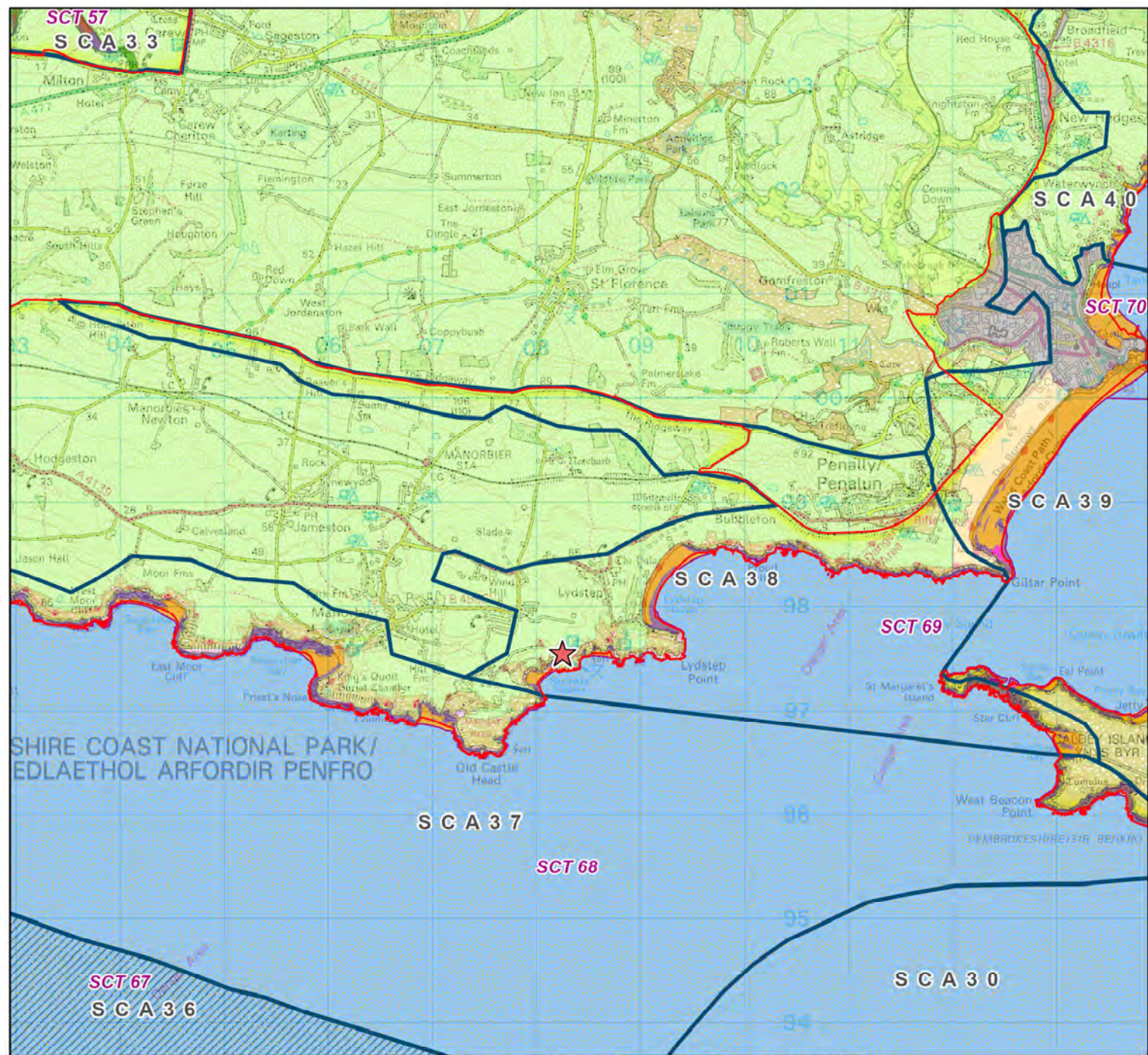
SCA26:Skokholm and Gateholm coastal waters



- Key**
- PCNP Boundary
 - Seascape character area boundary
 - Marine type boundary
- Marine Type**
- Shallow water, sand sea bed, low wave stress
 - Shallow water, sand sea bed, high wave stress
 - Medium depth water, gravel sea bed, low wave stress
 - Medium depth water, sand sea bed, low wave stress
- Intertidal Type**
- Rock
 - Sand and Shingle
 - Saltmarsh and Saline Reedbed
- Terrestrial Type**
- Sand Dune
 - Beach/rough ground above HWM
 - Coastal heath and grassland mosaic
 - Grassland and semi-natural mosaic
 - Mixed woodland and scrub
 - Pastoral farmland
 - Maritime Cliff and Slope
 - Built up area
 - Grassland mosaic- MOD range
 - Mire or swamp
 - Open water
 - ★ Dark sky discovery sites



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- Key**
- PCNP Boundary
 - Seascape character area boundary
 - Marine type boundary
- Marine Type**
- Tidal channels, ria
 - Shallow water, sand sea bed, low wave stress
 - Shallow water, sand sea bed, high wave stress
- Intertidal Type**
- Biogenic Reefs
 - Mud
 - Rock
 - Sand and Shingle
 - Saltmarsh and Saline Reedbed
- Terrestrial Type**
- Sand Dune
 - Beach/rough ground above HWM
 - Coastal heath and grassland mosaic
 - Grassland and semi-natural mosaic
 - Broadleaved woodland and scrub
 - Pastoral farmland
 - Built up (resort)
- ★ Dark sky discovery sites



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Pembrokeshire Coast National Park Authority

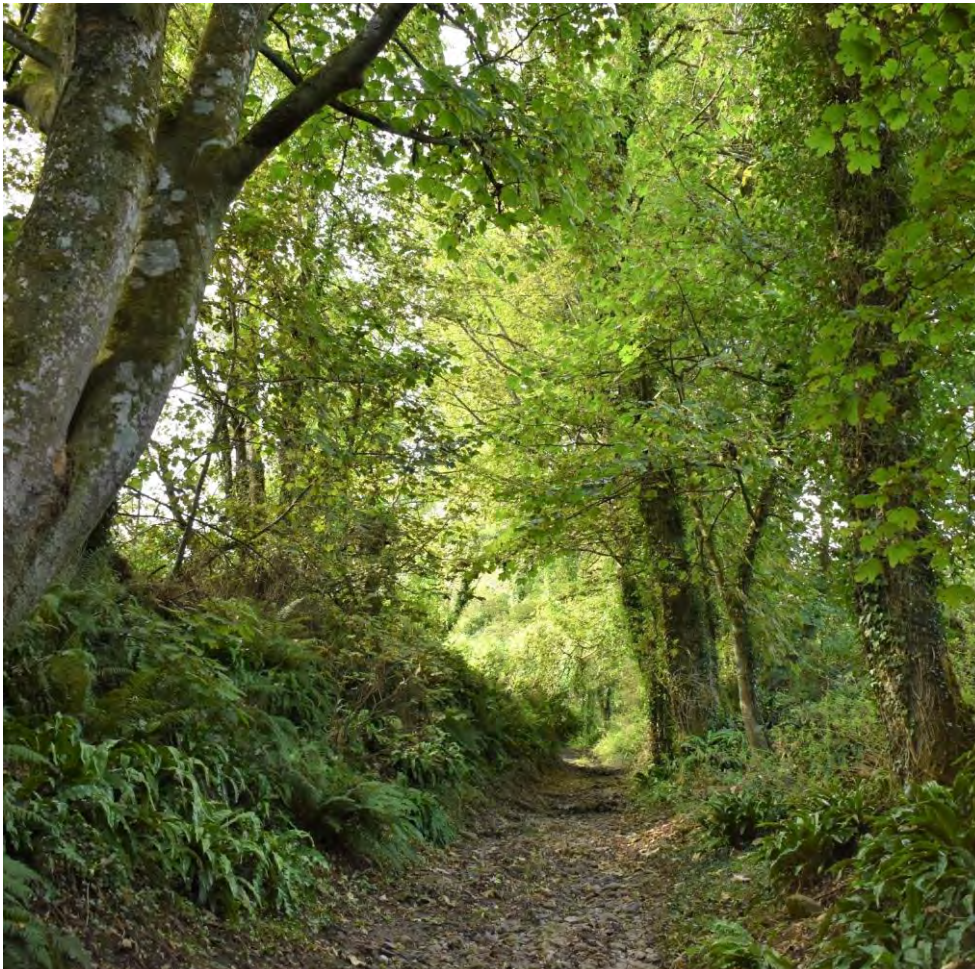
Tree and Woodland Guidance **Pembrokeshire Coast National Park**

A landscape sensitivity assessment to woodland creation

Draft Supplementary Planning Guidance

Consultation: 26 October 2022

Adoption:



Chapter 1 Introduction

and historic environment. New tree and woodland planting should take account of the special qualities and distinctive features of the receiving landscape – with a focus on ‘*the right tree in the right place*’. This is not least in recognition of the fact that other natural habitats that may be characteristic in a landscape are equally as important (or in some cases, more so) for ecosystem service delivery, including climate regulation. The Guide therefore aims to direct woodland to the most appropriate locations in terms of landscape sensitivity, while supporting opportunities for the positive management of non-woodland habitats. It is envisaged that further specific advice may become available regarding biodiversity and heritage sensitivities in the National Park.

New paragraph: Relevance to local communities

This Guidance provides advice on the types of landscapes where sensitivities may allow new trees or woodland planting, helping to guide the right tree to the right place.

Advice is given for specific Landscape Character Areas within the National Park, and for grouped landscape types.

The Guidance will be of relevance to communities who are planning to plant or restore trees or woodland, or who wish to comment on or otherwise influence the landscape implications of planting proposals.

Overview

1.5 The Guide aims to:

- assist those proposing to plant trees or woodland within the PCNP; and
- inform the NPA's response to planting proposals on which it is consulted.

1.6 The Guide provides an evidence base to help respond to the environmental and climate emergency as set out in the National Park Authority's ten-year plan *Responding to the Climate Change Emergency (2020-2030)* by providing advice on the types of landscapes where sensitivities may allow new trees or woodland planting, while ensuring that considerations of 'right tree, right place' are taken into account. Strategic opportunities and guidance for woodland planting are also included.

1.7 The Guide may be viewed as an extension to the existing management guidance in the Pembrokeshire Coast National Park Landscape Character Supplementary Planning Guidance² and Seascape Character Supplementary Planning Guidance³. The Landscape Character Area (LCA)

classification forms the spatial framework for the Guide, as set out in **Figure 1.1**.

New paragraph: This Guide may also be used to plan landscape enhancement works associated with development proposals. This includes landscape enhancement which is being delivered in accordance with policies SOC_06 and SOC_07 in the Welsh National Marine Plan 2019, which refer to enhancement of designated landscapes and of seascapes.

1.8 The method for this project is described in **Chapter 2**. **Chapter 3** describes the existing woodland character of the National Park with general guidance for woodland creation, while **Chapter 4** reports on the results of the landscape sensitivity assessment. **Chapter 5** includes guidance and illustrations of opportunities for future tree and woodland creation for typical landscapes found within the National Park.

1.9 Individual assessment profiles and guidance for each LCA are presented in **Appendix A**.

² [Pembrokeshire Coast National Park Landscape Character Supplementary Planning Guidance](#)

³ [Pembrokeshire Coast National Park Seascape Character Supplementary Planning Guidance](#)

Chapter 2
Methodology and scope

This includes the kind of woodland that is needed to maintain and enhance the resilience of Wales' ecosystems and increased canopy cover.

2.6 Creating both new native and new mixed woodlands that can deliver multiple benefits, and to use planting and natural processes to do so, is a challenge which applies equally to designated landscapes such as the National Park as to the rest of Wales. *Valued and Resilient: The Welsh Government's Priorities for Areas of Outstanding Natural Beauty and National Parks* was issued by the Welsh Government in July 2018 and outlines key priority areas for national park authorities in Wales. These include 'increasing woodland cover while respecting the special qualities of these landscapes'.

[New para: Future Wales: The National Plan 2040 \(Welsh Government, 2021\) Policy 9 – Resilient Ecological Networks and Green Infrastructure aims to ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure.](#)

[New paragraph Natural Resources Policy \(Welsh Government, 2017\) and South West Wales Area Statement \(Natural Resources Wales\)](#)

[Natural Resources Policy states that “trees and woodlands are vital in delivering...our national priorities. Wales needs both large and small scale, diverse woodlands that include both conifer and broad-leaved species”, that there should be “greater integration between woodland and other land uses...” and that “New woodland will need to be created and trees established to provide greater connectivity between, and increase the size of woodland habitat patches...”](#)

Pembrokeshire Coast National Park Local Development Plan 2 (September 2020)

2.7 Policies set out in the National Park Local Development Plan form an important consideration, and the Guide seeks to assure that positive outcomes in relation to these policies are met whilst ensuring landscape character is retained and enhanced. This includes:

- Policy 8 Special Qualities: the special qualities of the Pembrokeshire Coast National Park will be conserved and enhanced.

The priorities will ensure that:

- c) The pattern and diversity of the landscape is protected and wherever possible enhanced

- Policy 14 Conservation and enhancement of the Pembrokeshire Coast National Park.

'Development will not be permitted where this would have an unacceptable adverse effect on the qualities and special landscape and seascape character of the Pembrokeshire Coast National Park including locally distinctive characteristics by:'

- a) causing visual intrusion; and/or
- b) introducing or intensifying a use which is incompatible with its location; and/or
- c) failing to harmonise with, or enhance the landform, landscape and seascape character of the National Park; and/or
- d) losing or failing to incorporate important traditional features.

Pembrokeshire Coast National Park Management Plan 2020-2024

2.8 Policies set out in the National Park Management Plan 2020-2024, also form an important consideration. This includes:

- Policy L1: the conservation and enhancement of the national park's landscape and seascapes.
- Policy E1: protecting and improving biodiversity quality, extent and connectivity at scale (Policy E1).
- Policy H1: Conserve and enhance landscapes of particular historic interest, Conservation Areas, scheduled monuments, listed buildings and their settings.
- Impact during the Plan period:
 - d. Conserve and restore field boundaries with a particular emphasis on areas of registered historic landscapes and relevance to connectivity for biodiversity.
- Policy N1: contributing to a low carbon economy for Wales and adapting to climate change (Policy N1).

2.9 Policies in the Management Plan are underpinned by a series of intended impacts. These include:

- Conserving and restructuring semi-natural woodland, wood pasture, trees in the landscape and field boundaries.
- Creating hedgerows and new woodland strips.

Chapter 2 Methodology and scope

- Reducing the impacts of non-native coniferous woodland on biodiversity.
- Supporting soil conservation, management of peat soils, wetland protection, conservation and expansion of semi-natural habitats and protecting the best and most versatile agricultural land from development.

Woodland Funding and Delivery Mechanisms

2.10 A range of funding and delivery mechanisms for tree and woodland planting and creation are available and are likely to become available over the next few years. Up to date information on support available for new woodland creation can be found through Natural Resources Wales ⁵

Scope of the Guide

2.11 It is well known that tree and woodland planting can bring a range of benefits for both nature and society. Additionally, the appropriate, sustainable management and regeneration of existing woodlands is as important as establishing new woodlands, as well as being a lower-cost way of slowing climate change and enhancing biodiversity.

2.12 However, while most new tree cover is a positive thing, planting new woodland in the 'wrong' locations could result in unintended negative consequences on the special landscape qualities of the National Park and its rich natural and cultural heritage. For example, poorly designed monoculture planting can change the diversity and special qualities of the landscape, including open landscapes and extensive views from the uplands. Establishing woodlands on areas of species-rich grassland, heathlands or peatlands, can reduce biodiversity or even release more carbon than will be stored by the planted trees. Trees can also damage buried archaeology, historic sites and their settings.

2.13 Therefore, taking a holistic and well-planned approach which builds on the existing landscape framework (such as strengthening hedgerow networks and links to existing woodland, as well as new planting) is what the guidance produced by this study aims to achieve

Conserving non-woodland habitats and species

2.14 In addition to its woodland, the National Park also contains a number of important non-woodland habitats that need to be considered in planning for woodland expansion and management. It is important that measures to expand the

area of woodland within the National Park do not result in damage or loss of these important habitats. The design and location of schemes should therefore have regard to such sites to ensure that adverse effects on protected and priority species and habitats are avoided. It is also important to ensure that site-specific assessment of woodland creation proposals give appropriate consideration to significant, but undesignated habitats, such as the transition habitats between areas of wetland, grassland and woodland habitats.

Tackling non-native species

2.15 Invasive non-native species of plants and animals pose a significant and growing threat to biodiversity, and the National Park is no exception. Riparian habitats are particularly susceptible to invasive plants, and seeds and other materials can be quickly and widely spread by the action of the water. As these areas are often relatively undisturbed, populations of invasive species, such as Himalayan balsam, can become well established. Efforts to identify, manage and eradicate invasive non-native species, should form part of any tree creation scheme.

Protecting cultural heritage

2.16 Trees and woodlands are an integral part of the historic environment – contributing to the setting of a range of assets, adding to the character of historic towns and villages, and preserving the patterns of past activity. However, while trees and woodlands are an important component of many of the National Park's historic landscapes, there is potential for new woodland, whether planted or naturally regenerated, to affect sensitive parts of the historic environment. Archaeological sites, both above and below the ground, are often vulnerable to damage from tree roots. Archaeological landscapes and inter-visibility of monuments can be affected by inappropriately located planting.

2.17 However, careful siting and well-planned woodlands can make a significant positive contribution to the setting of sites, reinforcing landscape character and restoring degraded landscape structure. Similarly, positive management of the area's extensive suite of designed landscapes is necessary to secure the contribution these assets make to local character, distinctiveness and a sense of time-depth in the landscape. Many of the trees in these historic landscapes are mature or over-mature and in some cases they are suffering due to a lack of appropriate management. The changing climate could compound these issues as a result of storm damage, stress and disease. It is important to ensure that site specific

⁵ Support available for new woodland creation
<https://naturalresources.wales/guidance-and-advice/environmental->

[topics/woodlands-and-forests/grants-for-planting-trees-and-creating-woodlands/?lang=en](https://naturalresources.wales/guidance-and-advice/environmental-topics/woodlands-and-forests/grants-for-planting-trees-and-creating-woodlands/?lang=en)

woodland creation proposals give appropriate consideration to the cultural heritage of a site.

Important note:

The assessment should not be interpreted as a definitive statement on the suitability of certain locations for planting.

The Guide can only play an advisory role in relation to environmental protection and the weighing of potential benefits against likely impacts. Detailed site-specific assessment of proposals for woodland creation and management will always be required to provide this information and contribute to well-informed decisions. Proposals for woodland creation and management plan should seek opportunities to protect, manage and create non-woodland habitats and networks and protect any known sites of archaeological and historic importance.

The UK Forestry Standard (UKFS) (2017) and the Pembrokeshire Coast Landscape

2.18 The suite of Forestry Commission guidance, in particular the mandatory UK Forestry Standard (UKFS) should ensure best practice in woodland design and management of existing woodland.

2.19 Proposals for all new woodlands in the National Park need to be designed to high standards and should be underpinned by UKFS General Forestry Practice Requirements No. 17: 'New forests and woodlands should be located and designed to maintain or enhance the visual, cultural and ecological value and character of the landscape.'

2.20 All woodland planting schemes greater than 2 hectares in National Parks require screening for Environmental Impact Assessment and a woodland creation plan must be prepared which follows the guidelines set out in line with the UKFS 2017.

2.21 Section 6.4 of the UKFS (pages 96 – 127)⁶ relates to forests and landscape. It identifies four landscape context factors and seven Forest Design Principles which should be used in the siting and design of new planting. Although the production of a Forest Management Plan is only compulsory for larger schemes, the principles are relevant for all schemes, and will help establishing new woodland in the right place.

Spatial framework for the assessment

2.22 The Landscape Character SPGD provides detailed descriptions of the landscapes of the National Park and what makes them unique. It does this by identifying Landscape Character Areas. ~~For each one~~ Where relevant, management guidance is provided on how landscape character can be enhanced through tree planting and management. This Guide sets out further detail on tree and woodland expansion using the National Park's 28 Landscape Character Areas⁷ as a spatial framework as shown in **Figure 1.1** above. It aims to show how tree cover can be increased in a way that recognises the diversity of landscapes found in the National Park, enhancing the character of the landscape while retaining its distinctive identity.

2.23 The main focus of this Guide is on the sensitivity of the landscape of the National Park to woodland creation and management. Although a consideration of natural and cultural heritage is included, individual proposals for woodland creation should undertake more detailed consideration of the potential sensitivities of both. The 'urban' LCAs (LCA 2: Tenby, LCA 17: St Davids and LCA 23: Newport) have been excluded due to the more limited opportunities for woodland planting in these areas, however generic guidance for tree and woodland planting in this document can be used to guide woodland creation in these locations (see **Table 3.2**).

Type and scale of woodland planting considered

Scale of woodland planting

2.24 The Guide judges the suitability of different scales and types of woodland planting, based on bandings that reflect woodlands that are currently characteristic of the local landscape and those most likely to be accommodated in the landscapes of the National Park.

2.25 The scale of woodland considered for this guide consists predominantly of small scale planting (less than 30ha). Larger scale woodland (over 30ha) is also considered; however, this scale of woodland is unusual in the National Park and largely concentrated in the upland areas and along the wider estuaries.

Woodland planting types

Broadleaved woodlands

2.26 The woodland types considered for this guide mostly consist of native broadleaf species (although some non-native

⁶ UK Forestry Standard (UKFS) 2017

⁷ Landscape Character SPG

Table 2.1: Woodland types and descriptions

Woodland types	Area	Description
Small-scale woodlands	≤5ha	Small predominantly native woodlands, less than or equal to 5ha in area, including copses, farm woodlands, shelter belts or riparian woodlands. Traditional orchards and wood pasture are also considered under this woodland type.
		Small scale mixed woodlands, less than or equal to 5ha in area. Woodlands comprising both broadleaf and coniferous species (where the proportion of broadleaves is more than 50%).
Small-medium scale	>5- 15ha	Small-medium scale predominantly native woodlands between 5 and 15ha in area including copses, shelterbelt woods or riparian woodlands.
		Small-medium scale mixed woodlands (predominantly broadleaf), between 5 and 15ha in area. Woodlands comprising both broadleaf and coniferous species (where the proportion of broadleaves is more than 50%).
Medium-scale woodlands	>15-30ha	Medium scale predominantly native woodlands, between 15 and 30ha in area.
		Medium scale mixed woodlands (predominantly broadleaf), between 15 and 30ha in area. Woodlands comprising both broadleaf and coniferous species (where the proportion of broadleaves is more than 50%).
Large-scale woodlands	>30ha	Large sized predominantly native woodlands over 30ha in area.
		Large sized mixed woodlands (predominantly broadleaf) over 30ha in area. Woodlands, comprising both broadleaf and coniferous species (where the proportion of broadleaves is more than 50%).

Evaluating landscape sensitivity

2.38 This study is based on an understanding of landscape sensitivity, using an established methodology consistent with national guidance.

2.39 The method used to evaluate landscape sensitivity to woodland planting has been adapted from the approach used by LUC for similar studies and draws on advice contained in An Approach to Landscape Sensitivity Assessment (Natural England, 2019) as well as the draft guidance published by Natural Resources Wales: 'Landscape Sensitivity and Capacity Statement (2018)⁹. Although specifically applied to onshore wind and solar PV development types, this emerging Welsh guidance may be adapted for other forms of landscape change. Landscape Sensitivity and Capacity Assessment has become an important way of using an understanding of landscape character to inform the management of landscape

change. [Guidance on landscape sensitivity assessment, in relation to spatial planning and land use change, has been published by Natural Resources Wales.¹⁰](#)

2.40 The development of the assessment approach also takes account of guidance in The UK Forestry Standard (2017) – Section 6.4 (Forests and Landscape) and Design Techniques for Forest Management Planning.

New paragraphs: The method used to evaluate landscape sensitivity to woodland planting has been adapted from the approach used by Land Use Consultants (LUC) for many landscape sensitivity assessments.

While LUC's approach draws on advice contained in the Natural England guidance 'An Approach to Landscape Sensitivity Assessment' (2019), as well as guidance published by Natural Resources Wales, LUC has found in the past that there is

⁹ Natural Resources Wales. 2018 Landscape Sensitivity and Capacity in relation to on-shore wind and solar photo-voltaic developments: An assessment approach for Wales

¹⁰ [Landscape Sensitivity Assessment Guidance for Wales, Guidance Note 017, August 2022.](#)

Chapter 2
Methodology and scope

overlap between 'susceptibility' and 'value' indicators and therefore a set of sensitivity criteria is used that takes into account aspects of both. It is considered that this is an appropriate approach for this Guidance, which has a strategic purpose, in contrast to more site-specific assessments, such as Landscape and Visual Impact Assessments.

LUC's indicators are tailored to the landscape change or development being considered (in this case trees and woodland) and the landscape being considered (in this case a nationally designated landscape).

The study area is restricted to the landscape of the National Park, a landscape that is effectively all high value. This makes a division of criteria into 'susceptibility' and 'value' indicators more challenging, as the suggestion that parts of the National Park landscape are of 'higher value' than other, would effectively be double counting. Instead, the sensitivity criteria used in this study, include 'value' indicators, reflecting those special qualities of the National Park that could be impacted by tree and woodland planting. For example, the criteria for the 'Perceptual and scenic qualities', indicator covers many of the special qualities listed in the National Park Management Plan 2020-2024 that make the landscape of the National Park unique, such as 'coastal splendour', 'diversity of landscape', 'remoteness, tranquillity and wildness'.¹¹

The indicator for 'Historic Landscape Character' includes a consideration of the rich historic environment, and the indicator 'Field and landcover pattern' includes a consideration of the 'richness of habitats and species' as they relate to landscape character."

Assessment criteria

2.41 The selection of landscape sensitivity indicators ('criteria') for this study is informed by the attributes of landscape that could be affected by woodland planting. It considers the 'landscape', 'visual' and 'perceptual' aspects of sensitivity, including:

- Landform and scale;
- Field and landcover pattern;
- Existing woodland pattern and diversity;
- Historic landscape character;
- Visual character (including skylines); and
- Perceptual and scenic qualities.

2.42 **Tables 2.3** at the end of this chapter provides guidance and examples of features/attributes of higher and lower sensitivity to woodland planting in the National Park. These criteria were used to determine the key sensitivities to woodland planting for each LCA and inform judgements on overall levels of sensitivity.

2.43 The initial stage of the assessment involved a thorough desk-based study, drawing on sources of spatial and descriptive information regarding the landscape (see **Appendix B**). This was supplemented by field survey work undertaken by a team of landscape professionals to verify the findings.

New paragraph: The following caveats should be noted:

- The landscape sensitivity of one part of an assessment unit may differ to that of another part. Such detail is not picked up without a finer scale of assessment.

-Sensitivity levels are relative to other areas in the assessment. Levels may be calibrated differently in other assessments, meaning that direct comparison may not be correct.

-Specific development proposals on specific sites may need their own, more detailed assessment, normally a landscape and visual impact assessment.

Making overall judgements on landscape sensitivity

2.44 Key attributes or features of the landscape that could be affected by woodland creation were identified and are listed under 'key sensitivities' for each LCA. An overview of the sensitivity of each LCA is provided, and any area or feature, attribute or locations within the LCA judged to be of more or less sensitive (due to local variations in landscape sensitivity), is highlighted.

2.45 This is translated into overall scores of 'landscape sensitivity' (see **Table 2.2**) for the different bandings of tree and woodland planting. The results for each LCA are shown in the individual assessment profiles.

Table 2.2: The five-point scale of 'landscape sensitivity'

Overall Sensitivity rating	Definition
----------------------------	------------

¹¹ The special qualities of Pembrokeshire Coast National Park are listed in the National Park Management Plan 2020-2024. They are: accessibility; coastal splendour; • cultural heritage; distinctive settlement character; diverse geology; diversity of landscape; islands;

remoteness, tranquillity and wildness; rich historic environment; richness of habitats and species; space to breathe; the diversity of experiences and combination of individual qualities

Chapter 3
Existing woodland character and guidance for woodland creation

streets and parks also help to lower noise pollution, combat air pollution, reduce temperatures in urban areas in summer and reduce the pressure on urban drainage systems by absorbing water.

Right tree, right place

3.13 As recognised by the UK Forestry Standard¹⁸ Guidelines on Forests and Landscapes:

'An appreciation of landscape character helps determine the capacity of a landscape to accommodate new forests and their design with respect to the key landscape characteristics of a particular area. Within a **valued landscape**, new forests, woodlands and trees can have a significant impact on its recognised qualities and how people experience it'.

3.14 Pembrokeshire Coast National Park is one of the smallest UK National Parks but has one of the most diverse landscapes and is the only National Park which is primarily designated for its unique coastal landscape.

3.15 Ecologically it is one of the richest and most diverse parts of Wales and is recognised as of international importance for a wide range of high-quality habitats and rare species. The high ecological value of many parts of the National Park is reflected in its coverage of nature conservation designations which include 13 Special Areas of Conservation (three marine SACs overlap about 75% of the Park's coastline and account for about 60% of the inshore area), five Special Protection Areas, one Marine Conservation Zone at Skomer, seven National Nature Reserves and 60 Sites of Special Scientific Interest (SSSI) – with 80% of the National Park coastline designated as SSSI.

3.16 The National Park also has a rich historic environment including 286 Scheduled Monuments, 14 Conservation Areas, and 15 registered historic parks and gardens. Large swathes of the National Park are registered as a special or outstanding historic landscapes. The National Park also has many

undesigned historic features, including archaeological sites and historic buildings.

3.17 Due to the richness of the landscape context, opportunities for woodland creation are correspondingly limited in terms of type and extent. The National Park Authority aims to achieve a holistic and well-planned approach to woodland creation which builds on the existing landscape framework. If woodland planting was permitted across a landscape, many of the elements (and combination of elements) that make this nationally protected landscape distinctive would be blurred or lost. Valued semi-natural habitats could be replaced by uncharacteristic woodland or the restoration potential to alternative habitats lost. Heritage features could be obscured, or the sense of wildness and remoteness along the unique coastline diminished. Woodland creation in the National Park should therefore be designed to take account of this landscape context in order make a positive contribution to the character of the local area.

Guidance for tree and woodland planting

3.18 Guidance on the factors that contribute to the appropriate design of woodland and tree planting in the National Park are set out below in **Table 3.1**. [These align with guidance contained in the UK Forestry Standard. LANDMAP is a source of further relevant information, particularly as it includes information on existing woodlands, including evaluation and guidance for management as part of the Landscape Habitats Aspect.](#)

Further guidance

3.19 The UK Forestry Standard (UKFS)¹⁹ sets out the standard for the planning, design and sustainable management of forests and woodland in the UK and provides valuable guidance for woodland creation.

3.20 Natural Resources Wales can also offer guidance on how to grow the right tree in the right place for the right reasons, and further guidance on tree planting is available from Forestry Commission Wales, including how planting trees can contribute to a farm business²⁰.

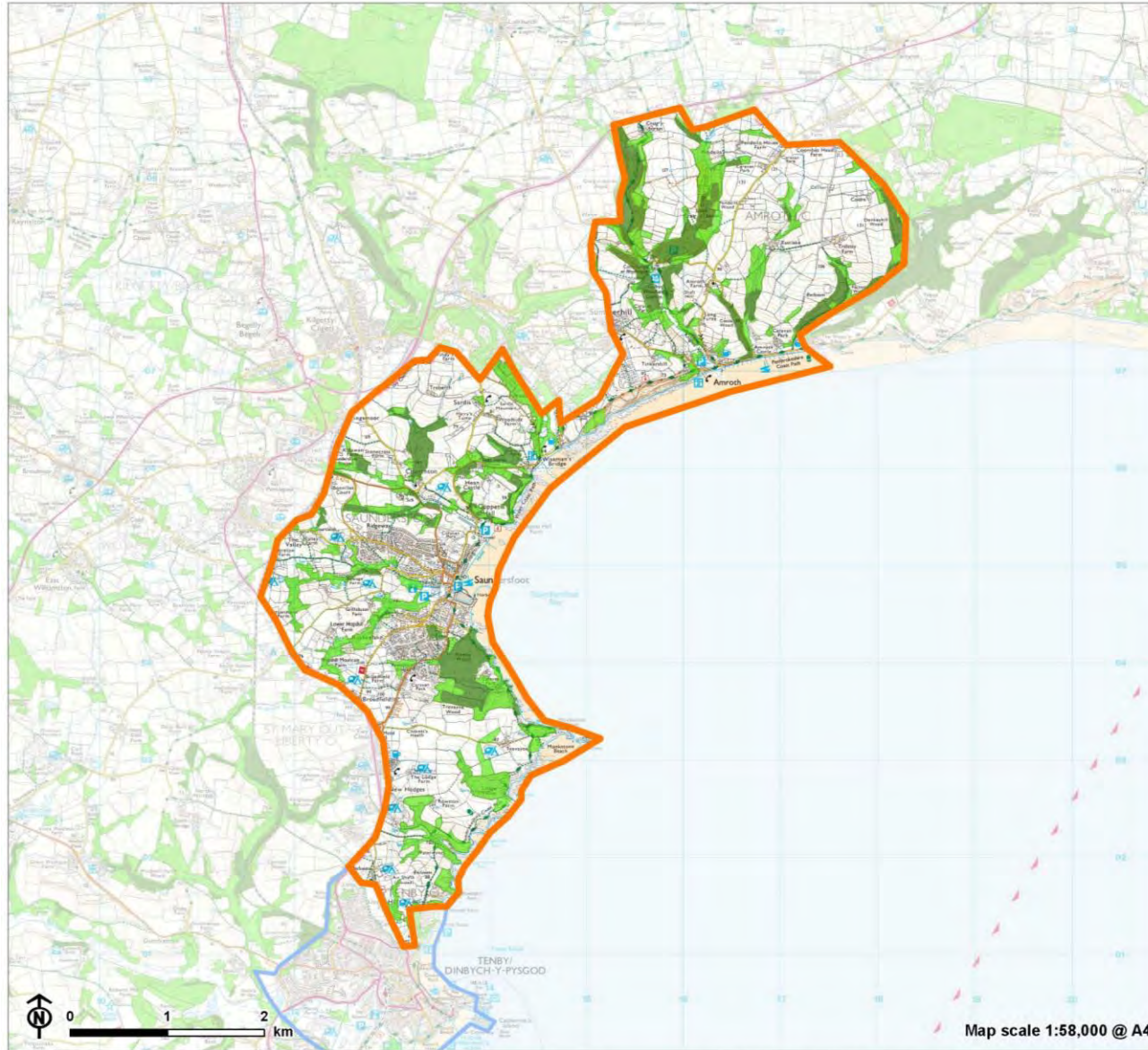
Table 3.1: Guidelines for woodland and tree planting in the National Park

Factor	Guidance
Shape	New woodlands should be located to establish a good fit with existing semi-natural woodland shapes and patterns, including the pattern of species within them. Woodland within the National Park is often small in scale and linear in shape, located along sheltered stream valleys or extending along river and estuaries and this irregular pattern should be reinforced and extended. Existing vegetation patterns and species

¹⁸ Forestry Commission, The UK Forestry Standard (2017)
¹⁹ Forestry Commission [The UK Forestry Standard \(2017\)](#)

²⁰ [New Farm Woodlands](#)

LCA 1: Saundersfoot Settled Coast



Trees and Woodland Siting and Design Guidance
Pembrokeshire Coast National Park Authority



LCA 1 location and existing woodland coverage

LCA 1: Saundersfoot settled coast

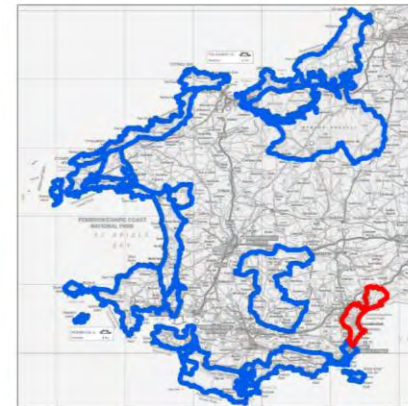
Neighbouring LCA

Existing Woodland

Ancient woodland

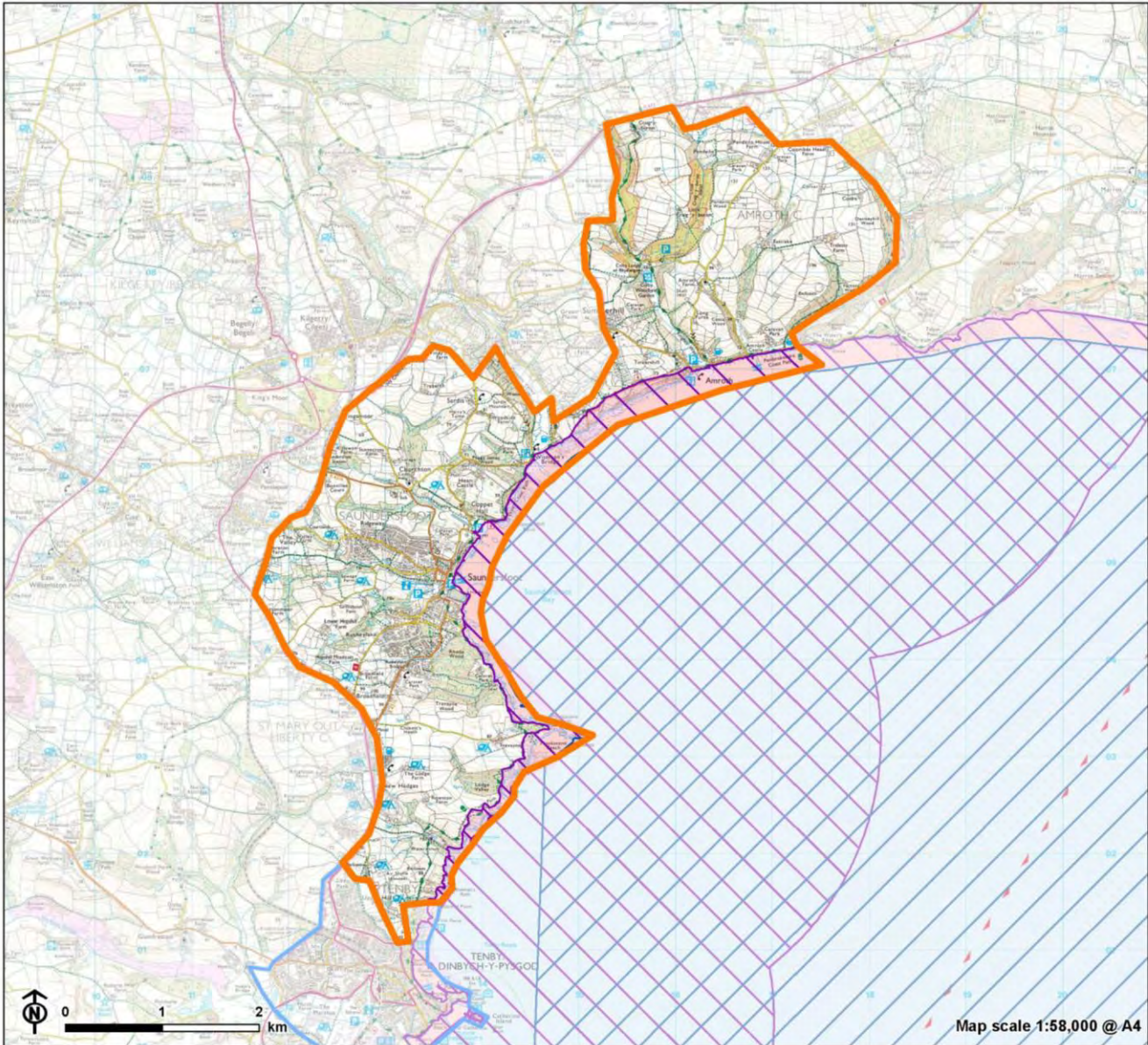
National Forest Inventory woodland*

*The NFI definition of woodland is a minimum area of 0.5 hectares



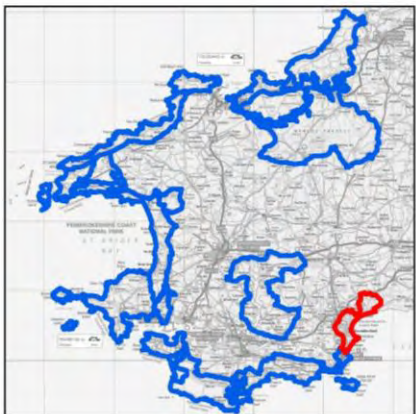
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CB AHB EB: Collins_N LUC FIGX_11664_r0_LocationAndWoodland_A4L_09/11/2021
Source: OS, FC, NRW



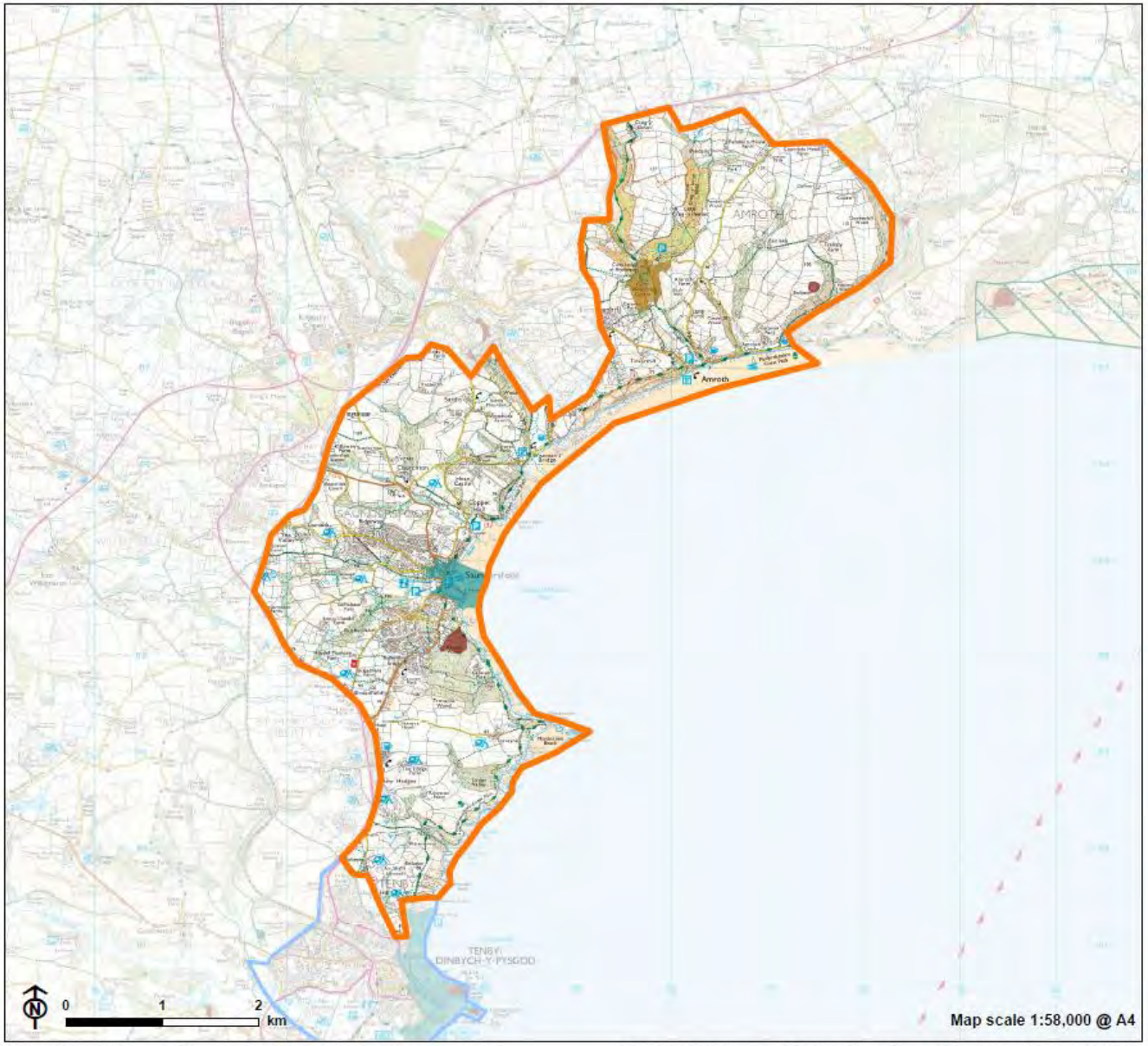
LCA 1 nature conservation designations

-  LCA 1: Saundersfoot settled coast
-  Neighbouring LCA
-  Special Protection Area
-  Special Area of Conservation
-  Site of Special Scientific Interest



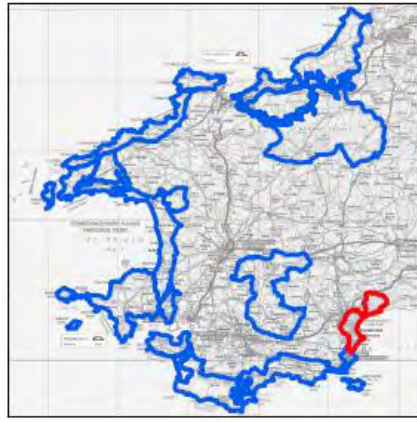
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 Source OS, NRW



LCA 1 Historic Environment Designations

-  LCA 1: Saundersfoot settled coast
-  Neighbouring LCA
-  Outstanding Historic Landscape
-  Gardens and Kitchen Gardens
-  Registered Historic Parks and Gardens
-  Scheduled Monument
-  Conservation Area



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CB:AHB EB:Hardie-Brown_A LUC FIGX_11864_r0_CulturalHeritageDesignations_A4L 30/06/2022
 Source: OS, Cadw

Map scale 1:58,000 @ A4

Existing woodland coverage within the LCA



View north along coastline towards Amroth from the permitted footpath at Trewayne.

This Landscape Character Area (LCA) is characterised by rolling lowland incised by valleys with settlement which surrounds the broad Saundersfoot Bay. Woodland comprises 20.6% of the total land cover, of which 56.6% comprises broadleaved species. Woodland tends to be associated with stream valleys which flow to the coast. Woodland composition varies between the stream valleys, with some comprised of plantation woodland, while others are a mix of coniferous and broadleaved species (often including ancient woodland). Common broadleaved species include oak, ash, birch, beech, hazel, horse chestnut and sycamore. Plantation woodland has been felled in some areas (some in response to ramorum blight, *Phytophthora Ramorum*, in larch plantations) and is recolonising with broadleaved species (e.g. Rhode/Trewayne Wood and Hean Castle Estate). Hean Castle Estate is located to the north-east of Saundersfoot and is surrounded by a mix of broadleaved and coniferous woods, with mature parkland trees forming a distinct feature of the estate. Scrub habitat is located atop some of the sea cliffs, whilst some coastal areas such as near Amroth support stunted broadleaved woodland. The pasture fields located on the undulating land between the stream valleys are enclosed by hedges or hedgebanks (with diverse hedgerows including hawthorn, hazel, ash, sycamore and grey willow) with frequent mature hedgerow trees (predominantly oak and ash, with many of the ash trees showing signs of ash dieback). Coniferous woodland planting is frequently used to visually screen holiday parks, although near Monkstone there are areas of young mixed broadleaved woodland.

Designated features and valued attributes within the LCA Natural and cultural heritage designations and records

The focus of this Guide is on the sensitivity and opportunities for woodland creation in relation to landscape character. It can only play an advisory role in the weighing of potential benefits of woodland creation against likely impacts on non-woodland habitats and cultural heritage assets, which should be considered in more detail at site level. Please refer to the main report for more detail.

Natural heritage	SAC, SPA, SSSI NNR, LNR (including Wildlife	The Carmarthen Bay and Estuaries SAC covers 204.7ha of the LCA (11.4%), there is also 8.6ha of SPA designated land (0.5%). There are four SSSI in the LCA which cover 189.3ha (10.5%). There
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	Trust/ RSPB reserves) Ancient woodland	are no NNR or LNRs in the LCA. There are 2 RIGS, covering 4.3ha (0.2%). Ancient woodland amounts to 151.3ha (8.4%)
Cultural heritage	National Park Register of Historic Landscapes Scheduled Monuments, Conservation Areas, Listed Buildings and HER data	There are 36 listed buildings in the LCA. The three Scheduled Monuments collectively cover 6.3ha (0.3% of the LCA). Saundersfoot is a Conservation Area which covers 20.8ha (1.2%) of the LCA. Colby Lodge is a Registered Park and Garden, which covers 14.7ha (0.8%) of the LCA. LCA 1 Saundersfoot settled coast includes 436 HER records, which cover a range of archaeological and historical features, including scheduled and undesignated monuments, listed and non-listed historical buildings and locations of finds. These features date from prehistory up to recent times.

Landscape sensitivity to new woodland planting	
Key sensitivities	<ul style="list-style-type: none"> ■ The enclosed and intimate wooded valleys which are incised into the rolling lowland. To the north-east of Amroth, the landform rises to form rounded hills. ■ The ecological value of the semi-natural coastal habitats, with large tracts of the coast internationally and nationally designated as SAC/SSSI. ■ Ancient woodland which traces the stream valleys as they flow to the coast. ■ The irregular field pattern with some areas of small-scale enclosures. ■ The intimate character of the pastoral landscape which is enclosed by mature hedgerow trees and tall hedgebanks lining lanes. ■ The rich archaeological heritage, including prehistoric defensive enclosures within fields and industrial remains within the stream valleys. ■ The historic value of the parkland / estate around Hean Castle and Coppet Hall. Colby Lodge is a Grade II Registered Park and Garden, nestled amongst woodland in the stream valley to the east of Summerhill. ■ The character and appearance of the Saundersfoot Conservation Area. ■ Attractive views along the coast, including views towards Tenby with the prominent church spire forming a landmark feature. ■ The enclosed and intimate character of the wooded valleys which contrasts with the open, expansive character experienced on the coast.
Overview	<p>Areas characterised by (non-woodland) semi-natural habitats have high sensitivity to tree planting of any scale, especially areas which are designated for nature conservation. Areas which contribute to the setting of important heritage features including Saundersfoot Conservation Area and Colby Lodge Registered Park and Garden will also be more sensitive to woodland creation.</p> <p>Much of the farmland would be sensitive to large-scale woodland creation which would be out of keeping with the existing scale of small-medium scale woodlands and fields. There are opportunities for creation of up to small-medium broadleaved woodlands within the farmed landscape which would contribute to the pastoral/woodland mosaic and landscape structure.</p> <p>The stream valleys within the LCA are already densely wooded and some are characterised by plantation woodlands. They therefore have lower sensitivity to woodland planting, including the long-term restructuring of existing plantations to woodlands and/or creation of new broadleaved woodlands (up to medium scale). Sensitivity to new mixed woodland would be higher, although carefully sited small or small-medium woodlands may be appropriate in the short term to restructure the visual and species diversity of these forests.</p>

Landscape Sensitivity Scores					
Broadleaved woodland					
Small-scale broadleaved woodlands (≤5ha)	Low				
Small-medium scale broadleaved woodlands (>5- 15ha)	Low				
Medium-scale broadleaved woodlands (>15-30ha)		Low-moderate			
Large-scale broadleaved woodlands (>30ha)					High
Mixed woodland					
Small-scale mixed woodlands (≤5ha)				Moderate-high	
Small-medium scale mixed woodlands (>5- 15ha)				Moderate-high	
Medium-scale mixed woodlands (>15-30ha)					High
Large-scale mixed woodland (>30ha)					High



View across a caravan park to wooded valley slopes near Amroth Castle



View north-east along coast from Wiseman's Bridge, showing mixed woodland and scrub along coastal cliffs.

Opportunities for future tree and woodland coverage within the LCA

- There are opportunities for the restructuring of existing conifer plantations, removing incongruous blocks and working towards a gradual reversion to a woodland with a high broadleaved content (up to and including medium-scale woodlands).
- Small or small-medium scale broadleaved woodland planting could increase woodland coverage in agricultural land but should adjoin existing woodland and/or hedges in order to avoid masking the irregular field patterns of the pastoral landscape.
- Small-scale broadleaved woodland creation could provide opportunities to increase the connectivity of existing broadleaved woodlands and linear riparian woodland belts in the smaller-scale stream valleys and reinforce their enclosed wooded character.
- Consider the potential for natural regeneration of semi-natural woodland and scrub extending along the watercourses to enhance flood management, water quality, biodiversity and to help prevent soil erosion.
- There are opportunities for new woodland creation/restructuring of existing screening woodland to help integrate camping and caravan sites into the landscape including to the east of Twycross and west of Saundersfoot.
- Consider planting other locally distinctive tree species such as oak in hedgerows to replace diseased mature ash trees.
- Consider the opportunities for the regeneration and extension of traditional orchards using heritage varieties.
- Explore opportunities to restore lengths of hedgerow which have been lost to past agricultural intensification (e.g. east of Summerhill).
- There are opportunities for the creation of wood pasture to integrate more trees into the agricultural landscape.
- Any new planting should follow principles of good design as set out in the UK Forestry Standard.
- Choose appropriate native species suited to local conditions (e.g. climate, soil, hydrology, existing vegetation) to achieve a diverse woodland mosaic character.
- Manage invasive species such as rhododendron, particularly around estates where planted specimens have begun colonising surrounding woodlands.

Strategic guidance for new woodland / tree planting

Landform and scale

- Design woodland to align along existing contours and undulations of the landscape, such as the stream valleys extending towards the coast.

Landcover (including semi-natural habitats)

- Avoid adversely affecting existing areas of non-woodland semi-natural habitats, directly or indirectly, and encourage diversity of habitat networks. This includes extensive tracts of valued coastal habitats which are internationally/nationally designated as SAC/SSSI.

Field pattern

- Restore and reinforce the pattern of irregular fields by conserving and regenerating hedgerow boundaries and hedgebanks.
- Consider allowing hedgerows to grow out (where not obscuring public highways/rights of way) through reduced coppicing/flailing cycles, to enhance biodiversity.
- Conserve existing hedgerow trees and plant new ones where absent or to avoid senescence.
- Tree planting should be considered to address the potential loss of diseased mature ash trees in hedgerows, replacing the mature trees with other locally distinctive species such as oak.

Existing tree and woodland character

- Preserve the agricultural and woodland mosaic character, especially that of the estate landscape and parkland around Hean Castle and Coppet Hall.
- Conserve and restore existing semi-natural broadleaved woodlands and trees in the landscape, including field boundaries,

to improve connectivity and strengthen the landscape framework.

- Protect areas of ancient woodland which mostly occur within the valleys of the LCA. Buffer ancient woodland by establishing fringing areas and encourage natural regeneration.
- Encourage a diverse range of native species to build resilience to the impact of pathogens, pests and diseases, e.g. *Phytophthora*, *Chalara* (ash dieback), and *Phytophthora Ramorum* in larch plantations.

Historic character

- Avoid adversely affecting, directly or indirectly, archaeological features within the landscape including prehistoric enclosures within fields and industrial remains within the stream valleys.
- Protect the character and setting of designated heritage assets including Saundersfoot Conservation Area and Colby Lodge Registered Park and Garden (Grade II).

Visual character

- Conserve the extensive coastal views, particularly from the Wales Coast Path.

Perceptual and scenic qualities

- Retain the open character of the agricultural land to the west of Saundersfoot which divides the two sections of the built area and contributes strongly to the local sense of place.
- Enhance the experience for recreational users, ensuring public access is maintained across the network of public rights of way linking the farmland and woodland. Explore new access opportunities as part of woodland creation.



Young planted broadleaved woodland west of Trevayne.



Mixed woodland surrounding the grade II* listed St Issell's Church.