

Pembrokeshire Coast National Park Authority

LOCAL DEVELOPMENT PLAN 3 (2025 - 2040)

Sustainability Appraisal (incorporating
Strategic Environmental Assessment)

Scoping Report

Consultation Draft: January 2026



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Section 1.0: Introduction

Sustainability Appraisal and Strategic Environmental Assessment

- 1.1 Sustainability Appraisal is a statutory requirement for Local Development Plans under Section 62(6) of the Planning and Compulsory Purchase Act 2004. The purpose of Sustainability Appraisal is to assess the social, economic, environmental and cultural wellbeing effects of the component policies, proposals and strategy elements of the Local Development Plan to ensure that decisions accord with the principles of sustainable development.
- 1.2 The Welsh Government define sustainable development in Wales through the Well-being of Future Generations (Wales) Act 2015 as:

“the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals” (a more comprehensive description of the Act and its goals can be found in Section 5).
- 1.3 Guidance¹ provided by the Welsh Government on the Preparation of Local Development Plans indicates that a Sustainability Appraisal must integrate the requirements of the Strategic Environmental Assessment Regulations. The requirements of EU Directive 2001/42/EC (also known as the SEA Directive) have been transposed into Welsh Law through The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004. Strategic Environmental Assessment requires the formal assessment of certain plans and programmes that are likely to have significant effects on the environment; this includes Local Development Plans.
- 1.4 Sustainability Appraisal is an iterative process; this means that assessment will be carried out at the earliest opportunity on emerging strategy and policy to ensure that the development of the Local Development Plan is informed by the process throughout. The Development Plans Manual (Third Edition, 2020) states that “Sustainability appraisal and Strategic Environmental Assessment will play an important part in demonstrating that the LDP is sound by ensuring that it reflects sustainable development objectives. It will contribute to the reasoned justification of policies”².

¹Para 4.3, page 63, Development Plans Manual Edition 3 (Welsh Government, 2020)

² Para 4.4, page 63, Development Plans Manual Edition 3 (Welsh Government, 2020)

Process

1.5 Components of the Sustainability Appraisal:

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

- Scoping - setting the context and objectives, establishing the baseline and deciding on the scope;
- Assess Local Development Plan strategic options against the Sustainability Objectives and produce Sustainability Appraisal Report ;
- Assess Local Development Plan policies against the Sustainability Objectives and produce Sustainability Appraisal Report;
- Produce a Sustainability Statement stating how the findings of the Sustainability Appraisal has been taken into account in the final Plan

1.6 This scoping report is concerned with the first stage. It contains a review of Policies, Plans and Programmes relevant to the Local Development Plan; baseline information describing the current conditions in the National Park; it identifies sustainability issues facing the Park and its people and establishes a Sustainability Assessment Framework - a set of objectives against which the sustainability of the Local Development Plan proposals and policies can be judged.

1.7 The consultees and consultation process for the Sustainability Appraisal are set out in the Delivery Agreement.

1.8 A full timetable for the Local Development Plan 3 can be found in the Delivery Agreement.

Habitats Regulations Assessment

1.9 Pembrokeshire Coast National Park Authority is a competent authority under the Conservation of Habitats and Species Regulations 2017, commonly referred to as the Habitats Regulations. In accordance with Regulation 63 of those regulations, must make an assessment of their Local Development Plan as a matter of law before it is put into effect. This assessment is generally referred to as a 'Habitats Regulations Assessment' or 'HRA' and the

regulations set out a clearly defined step-wise process which must be followed.

- 1.10 The Habitats Regulations Assessment for Local Development Plan 3 will be presented in a separate document.

Welsh Language

- 1.11 The Authority must make a conscientious effort to consider the impacts of policy on Welsh Language.
- 1.12 Planning Policy Wales (paragraph 3.26, Edition 12, July 2024) also states that “Planning authorities must consider the likely effects of their development plans on the use of the Welsh language as part of the Sustainability Appraisal. ...” and that “Development plans should include a statement on how planning authorities have taken the needs and interests of the Welsh language into account in plan preparation and how any policies relating to the Welsh language interact with other plan policies.” (paragraph 3.27)
- 1.13 Technical Advice Note (TAN) 20: Planning and the Welsh Language (2017) – Local Development Plans provides the framework for the development of Local Development Plan policies to protect Welsh speaking communities and specifies that Sustainability Appraisal is the mechanism by which to assess impacts to Welsh language, where Welsh language is identified as a priority by the local Single Integrated Plan.
- 1.14 The Sustainability Appraisal framework contains a specific objective against which to assess the impact of objectives, policies and sites on Welsh Language and local dialects. The Sustainability Appraisal process also requires that the cumulative effects of the policies and strategy of the Local Development Plan be examined.
- 1.15 A full Welsh Language Impact Assessment will also be carried out and presented in a separate document.
- 1.16 The Authority’s Welsh Language Compliance notice requires the Authority to consider how a new policy could be formulated (or how an existing policy could be changed) so that the policy decision would either;
- have a positive effect, or an increased positive effect, or

- would not have an adverse effect, or would have a decreased adverse effect, on the Welsh language and opportunities for persons to use the Welsh Language

1.17 The policy decision should also ensure that it does not treat the Welsh language less favourably than the English language. The Authority must make a conscientious effort to consider the impacts of policy on Welsh Language.

Equality, Socio Economic, Health and Human Rights Impact Assessment

1.18 Under the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011 the Authority must assess how any new or proposed policies and practices may affect protected groups. When assessing the impact on protected groups, the Authority must consider how this will affect its performance of the general duty of the Public Sector Equality Duty.

1.19 The Welsh Government has enacted the Socio Economic Duty under the Equality Act 2010. This means the Authority when making decisions of a strategic nature about how to exercise its functions, it must have due regard to the desirability of exercising them in a way that is designed to reduce the inequalities of outcome which result from socio-economic disadvantage.

1.20 The Health Impact Assessment (HIA) Regulations (Wales) 2025 introduce a statutory requirement for certain public bodies, including National Park Authorities, to undertake an HIA when developing or revising strategies, plans, or policies that are likely to have a significant effect on health. The aim of the regulations is to embed health considerations, including mental and social well-being considerations, into decision making processes.

1.21 It is unlawful for public bodies in Wales to act incompatibly with the European Convention of Human Rights and must meet their obligations under the Human Rights Act 1998. Public bodies also have obligations to consider, observe and give effect to international human rights treaties signed and ratified by the UK.

1.22 The Authority must be able to demonstrate that it has paid due regard to the above areas.

- 1.23 The combined assessment detailed above, for Local Development Plan 3, will be presented in a separate document.

Section 2.0 Relevant Plans, Policies and Programmes

- 2.1 The following Acts, Directives, policies, plans, programmes, reports and reviews have been identified as those that will guide and inform the production of the Local Development Plan 3 for the Pembrokeshire Coast National Park. It should be noted that this list may evolve as the Plan develops. For a more detailed description of the documents and their relevance to the Plan refer to Appendix A.

International

- [The 2030 Agenda for Sustainable Development](#) - Global framework for sustainable development goals.
- [The Paris Agreement \(2015\)](#) – Climate mitigation and adaptation commitments.
- [Kunming-Montreal Global Biodiversity Framework \(COP15, 2022\)](#) – Targets for biodiversity protection and restoration.
- [Sendai Framework for Disaster Risk Reduction \(2015–2030\)](#) – Disaster resilience principles.

EU Directives (key ones):

- [Habitats Directive \(92/43/EEC\)](#)
- [Birds Directive \(2009/147/EC\)](#)
- [Water Framework Directive \(2000/60/EC\)](#)
- [Environmental Impact Assessment Directive \(85/337/EEC\)](#)
- [European Landscape Convention \(2000\)](#) – Landscape protection and management.
- [The European Green Deal](#) – Climate neutrality and sustainability goals.

United Kingdom

- [Environment Act 1995](#) – Defines National Park purposes and socio-economic duty.
- [Wildlife and Countryside Act 1981 \(as amended\)](#) – Core wildlife protection legislation.

- [Conservation of Habitats and Species Regulations 2017](#) – Habitats Regulation Assessment requirement.
- [Flood and Water Management Act 2010](#) – Flood risk and sustainable drainage.
- [Evidence for UK Climate Change Risk Assessment \(CCRA3\) Summary for Wales \(2022\)](#) – Climate risk priorities.
- – Strengthening protected area management. [JNCC Joint Statement on Protected Areas \(2024\)](#)

Wales

- [Future Wales: The National Plan 2040 \(2021\)](#) – National spatial strategy and policy framework.
- [Planning Policy Wales \(Edition 12, 2024\)](#) – Core national planning policy.
- [Well-being of Future Generations \(Wales\) Act 2015](#) – Sustainable development principle and well-being goals.
- [Environment \(Wales\) Act 2016](#) – Biodiversity duty and climate targets.
- [Climate Change \(Wales\) Regulations 2021](#) – Net zero by 2050 and carbon budgets.
- [Climate Adaptation Strategy for Wales \(2024\)](#) – National adaptation framework.
- [Environment \(Air Quality and Soundscapes\) \(Wales\) Act 2024](#) – Air quality and soundscape management.
- **Technical Advice Notes (TANs)** – Key ones:
 - [TAN 15: Development, Flooding and Coastal Erosion \(2025\)](#)
 - [TAN 2: Planning and Affordable Housing](#)
 - [TAN 5: Nature Conservation and Planning](#)
 - [TAN 18: Transport](#)
 - [TAN 20: Planning and the Welsh Language](#)
- [Net Zero Carbon Budget 2 \(2021–2025\)](#) – Emissions reduction targets.
- [Agriculture \(Wales\) Act 2023 & Sustainable Farming Scheme 2026](#) – Sustainable land management.
- [Welsh National Marine Plan \(2019\)](#) – Marine planning framework.
- [Beyond Recycling Circular Economy Strategy \(2021\)](#) – Resource efficiency and waste reduction.
- [The Good Practice Guidance: Planning for the Conservation and Enhancement of Dark Skies \(2025\)](#) – Light pollution control.

Regional

- [South West Wales Regional Transport Plan \(2025–2030\) – Sustainable transport priorities.](#)
- [South West Wales Regional Energy Strategy \(2022\)](#) – Net zero energy vision.
- [South West Wales Area Statement \(NRW\)](#) – Ecosystem resilience and climate adaptation.
- [South West Wales Strategic Flood Consequence Assessment \(2022\)](#) – Flood risk evidence base.
- [South West Wales Regional Economic Delivery Plan \(2022\)](#) – Economic growth and resilience.

Local

- [Pembrokeshire Climate Adaptation Strategy \(2022\)](#) – Local climate resilience priorities.
- [Pembrokeshire Local Area Energy Plan \(2022\)](#) – Net zero energy transition.
- [Pembrokeshire Destination Management Plan \(2024–2028\)](#) – Regenerative tourism strategy.
- [Local Housing Market Assessment for Pembrokeshire \(2023\)](#) – Affordable housing need.
- [Nature Recovery Action Plan for Pembrokeshire \(2018\)](#) – Biodiversity and habitat connectivity.
- [Partnership Plan 2025–2029 \(PCNPA\)](#) – Strategic framework for National Park management.
- [Well-being Plan for Pembrokeshire \(2023\)](#) – Local well-being objectives.
- [Cleddau & Teifi Nutrient Management Plans \(2025\)](#) – Nutrient neutrality requirements.

Section 3.0: Baseline Information

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

Data limitations

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

derive data for the National Park area, or use data that describes a wider area.

- 3.5 Furthermore, most of the data used in the baseline has been collected by external bodies, and for purposes that may not be related to sustainability or environmental assessments.
- 3.6 The limitations of the data will have implications for the conclusions that can be drawn from the baseline and monitoring the Plan and Appraisal. These conclusions should therefore also refer to qualitative information and expert judgement and experience.

Section 4.0: Identification of Sustainability Issues

4.1 The following resources were used to identify Sustainability Issues:

- The Policies, Plans and Programmes relevant to the Local Development Plan;
- The baseline information gathered;
- The experience of officers in the National Park Authority of issues faced when working on behalf of the Authority;
- The Monitoring of the Local Development Plan 2 and Sustainability Appraisal over the last 4 years.

4.2 The issues identified through the above process are summarised below:

Issue 1: Effects of Climate Change

It is likely that climate change will have significant effects on the National Park, though the nature and scale of those effects is uncertain. The UK Climate Change Projections indicate that, in a moderate scenario, Wales would experience a sea level rise of 0.5m by 2100 with a high scenario of 1m. As a result of this it would be likely that coastal areas of Wales would suffer more frequent and severe flooding, coastal erosion and coastal squeeze. This would negatively impact existing habitats and biodiversity, infrastructure including the National trail and communities. On top of this the country is expected to experience more frequent and intense rainfall, hotter drier summers which impacts on agriculture and land management. It is necessary to mitigate and adapt to the changing climate. Improving ecological resilience protects the landscape and increases resilience to extremes of temperature and flooding thereby improving community, social and economic well-being.

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

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

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

For the purposes of developing the Partnership Plan 26 hotspots were identified where there is potential issues related to recreation. Some of the issues identified concern the wider use of a location by the communities that live in them e.g. traffic, and some are conflicts between multiple recreational uses of the same location e.g. diving and angling. The issues were identified through internal consultation with the Authority's education and engagement team and Rights of Way Team.

Issue 3: Landscape sensitivity to development

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

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

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

Issue 4: Dependence on private cars

Pembrokeshire is a rural area that currently has a strong reliance on the private car. 86.2% of households in the National Park own at least one car or van at the last census (2021), compared to Wales as a whole where 80.6% of households had a car or van. The National Atmospheric Emissions Inventory data for oxides of Nitrogen and Carbon Monoxide emissions show a strong correlation between emissions and the location of main roads suggesting that road transport causes pollution both locally and globally. However, the move to electric vehicles may help to address air quality particularly around major roads.

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

Issue 5: Protection of the physical environment

Natural resources, such as air quality, water supply and quality and soil quality need to be protected. Air quality in the National Park is generally high though there are pollution hotspots related to road traffic. River quality is generally moderate, though a number of the National Park's rivers and its coastal waters are classed as at risk or probably at risk (from diffuse and/or point source pollution; physical alteration; and/or alien species) by Natural Resources Wales under the Water Framework Directive. Additionally, in some areas of Pembrokeshire national modelling (APIS) shows that atmospheric ammonia concentration exceeds the critical level (1ug/m³ annual average concentration) for lichens and bryophytes and is therefore highly likely to be causing damage to the special features of protected sites and ancient woodlands in those areas.

In general, river quality is classed as moderate under the Water Framework Directive. Priority issues affecting water quality in the Park include diffuse and/or point source pollution, physical alteration and/or alien species.

Quality is impacted by issues including: diffuse and/or point source pollution, physical alteration and/or alien species.

As the Eastern and Western Cleddau and the Afon Teifi are classified as Special Areas of Conservation (SAC) they have also been assessed for compliance against new targets published in January 2021 to reduce the concentration of phosphorus in SACs across Wales.

They are failing to meet these more stringent phosphorus targets. The Source Apportionment Graphical Information System (SAGIS) undertaken showed the main causes of phosphorous entering the river Cleddau (65% in the Western Cleddau and 84% in the Eastern Cleddau) is agricultural run off from use of fertilizers, manure and soil erosion, and waste water discharges and storm water run off. In the river Teifi 30% of the phosphorous source was from rural land use, compared to 66% from waste water treatment works. High levels of phosphorous can lead to algal blooms and oxygen depletion causing harm to aquatic ecosystems. Further assessment of compliance in January 2024, against a number of other water quality targets, including dissolved oxygen and total and unionised ammonia revealed the Cleddau's and Teifi were amongst those with most target failures. Water quality impacts upon overall ecological resilience, biodiversity, drinking water provision and recreational activities.

Bathing water quality in the National Park is generally classed as good or excellent, however, there is always a risk that pollution, most commonly from sewage or agricultural sources, can have an impact upon quality dependent upon specific circumstances.

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

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

With regard to soil quality, within the National Park there is a high proportion of the Best and Most Versatile Agricultural Land (BMV) which national planning policy specifies should be conserved as a finite resource for the future. Analysis of the Predictive Agricultural Land Classification (ALC) Map 2 indicates that over 45% (44.59) of the land falls under ALC categories 1 to 3a compared to just 16% (16.2) when considering Wales as a whole. Future developments, climate change and farming practices have the potential to impact on soil health. Unhealthy or degraded soil can lead to loss of carbon, soil erosion, soil run off and loss of nutrients.

Issue 6: Reconciling energy development with landscape considerations

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

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

Agriculture and related activities (such as forestry) have been instrumental in shaping the National Park landscape and can continue to maintain and enhance that landscape and its associated biological and cultural diversity. Agriculture in Pembrokeshire is generally intensive which is often damaging, particularly to biodiversity, archaeological sites and water quality (Control of Agricultural Pollution (Wales) 2021). The steady decline of businesses in the Agriculture and Forestry sectors suggest that current economic conditions are difficult for farming and forestry, making it harder for these businesses to contribute to enhancing landscape and biodiversity, and have a sustaining role in the culture and communities of the National Park. Changes to the type of agricultural practices and agricultural land management as a consequence of the changing climate and evolving fiscal policy will be a significant factor affecting the national park's landscape, resilience to flooding, ecological resilience and community social and economic well-being.

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

An agricultural ammonia emissions attribution map (for National Network Sites receptors) – shows medium and high emission densities from the cattle sector in Pembrokeshire³.

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

Issue 8: The future of the built environment

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

Issue 9: The use and condition of the marine environment

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

Principal factors affecting the marine environment around Pembrokeshire are land use, shipping activity around Milford Haven, commercial fishing, together with increasing demand for aquaculture, renewable energy (issue 6) and recreation (issue 20), including inappropriate use of powered craft.

³ NERC Centre for Ecology and Hydrology, 2015, [Assessing and Addressing Atmospheric Nitrogen Impacts on Natura 2000 Sites in Wales](#)
DEFRA, 2018, Code of Good Agricultural Practice for Reducing Ammonia Emissions

Issue 10: Domestic and commercial resource use

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

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

The national park has a duty to protect, promote, conserve and enhance the historic environment. The National Park has 285 Scheduled Monuments, and over 10000 sites in the Historic Environment Record. There are over 1200 listed buildings and 13 designated Conservation Areas. Nine Historic Landscape areas are wholly or partly within the National Park, and there are 15 Historic Parks & Gardens in the National Park.

Issue 12: Maintain and enhance important biological resources

There is a requirement to maintain and enhance 13 Special Areas of Conservation and 5 Special Protection Areas all or partly within the National Park, 60 Sites of Special Scientific Interest, 7 National Nature Reserves, one Local Nature Reserve and one Marine Conservation Zone. The step-wise approach and the DECCA framework set out in Planning Policy Wales will be the means to demonstrate the steps have been taken towards securing a net benefit for biodiversity and improve habitat connectivity and ecological resilience.

Issue 13: Important geological resources

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

Issue 14: Important landscape resources

Designation as a National Park is primarily due to the importance of the landscape. National Parks in the UK are classified by the International Union for the Conservation of Nature as Category 5: Protected Landscapes. These are defined as an 'area of land, with coast and sea as appropriate, where the interaction of people and nature over time has produced an area of distinct character with significant aesthetic, ecological and/or cultural value, and often with high biological diversity. Safeguarding the integrity of this traditional interaction is vital to the protection, maintenance and evolution of such an area.'⁴

Issue 15: Affordable Housing need

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

The LHMA (2023) estimates a high need for one bedroomed affordable properties. The LHMA estimates a need for 74% of new social rented properties to be one bedroomed in the NP.

Issue 16: Quality of employment opportunities

Pembrokeshire the jobs available are often low paid (over 20% of full time workers earned less than £25,000 per year in 2024) and seasonal (winter benefit claimant rates are almost double those for summer).

Issue 17: Access to services

Closure of local services and the distance of travel to some services mean that access to essential services can be difficult in some parts of the National Park.

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

⁴ IUCN (1994) Guidelines for Protected Area Management Categories. Cambridge: IUCN

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

Issue 18: Second and holiday homes

At the 2011 Census the National Park had one of the highest rates (27.6%⁵) of second/holiday home use of its general housing stock in England and Wales. Further investigation of this issue using council tax data and Non-domestic rates indicates that for some of the centres in National Park this figure is significantly higher for example in Little Haven the proportion of second homes and holiday lets is ~51%, and 46% in Amroth⁶.

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

Issue 19: Military use of the National Park

There are a number of Ministry of Defence sites in the National Park, and there are problems associated with these in terms of disturbance, development and the restriction of access. Conversely the military presence has protected large areas from intensive agriculture and has therefore had positive effects in terms of biodiversity and the archaeological resource. The military also provide employment opportunities in the National Park.

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

For the National Park to meet its goals for inclusivity, opportunities to use the park for recreation need to be available to all sectors of society. Serviced and self-catering accommodation needs to be available to people on a range of incomes. This inclusivity would be threatened by policies that would shift Pembrokeshire's tourism product towards the high end of the market.

⁵ Based on Census 2011 "Households with no usual resident"

⁶ Pembrokeshire County Council 2025

The LHMA (2023) shows that, within the 2021 Census, Pembrokeshire recorded a slightly higher proportion of the population as disabled under the Equality Act in 2021 than Wales (22.0% compared to 21.6%). This amounts to 27,173 people within the County. Some 46.1% of these people disabled under the Equality Act are limited a lot in their day-to-day activities with the remaining 53.9% limited a little in their day-to-day activities. It is likely that the 12,522 people disabled under the Equality Act for whom day-to-day activities are limited a lot, will form the majority of the need for accessible and adaptable provision.

Issue 21: The opportunity of the National Park to improve health and well-being

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

Issue 22: Welsh language and cultural distinctiveness

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

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

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

Issue 23: Demand for minerals

There is demand for quarried minerals, in part fuelled by poor rates of recycling and reuse of mineral resources, and this National Park is a rich mineral resource. Current working quarries are reaching the end of their lives. Though National Planning Policy would advise against mineral extraction within National Parks except in exceptional circumstances, since 2000 the National Park Authority has received six applications to extend quarrying activity at existing sites or carry out exploratory work for new resources. In November 2025, there are currently 4 active quarry sites in the Pembrokeshire Coast National Park.

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

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

Section 5.0: Sustainability Objectives

- 5.1 The issues identified in Section 4 have been used to formulate sustainability objectives that together form a Sustainability Assessment Framework. This framework will be used to judge the sustainability of the objectives and policies of Local Development Plan 3.
- 5.2 The table below identifies related clusters of the issues identified in section 4. In the entries for the 'Cluster of related issues' column, the number refers to the issue identified in section 4, and the text refines their context to arrive at Sustainability Objectives.
- 5.3 These objectives are intended to indicate directions for change rather than end points. For this reason no targets are set; the goal in the context of Sustainability Appraisal is full realisation of the objective. The objectives are then tested for compatibility with National Park purposes and with each other.

Objectives:

SA Objective	Cluster of related issues	Decision aiding questions
Conservation		
Sustainability Objective 1: Conserve and enhance landscapes, seascapes, and all their components (including the built and historic environment and archaeology) with reference to the special qualities of the National Park	1,2, 3,6,7, 8,9,11,12,13,14,19,22, 23, 24	Does it aim to protect and enhance landscapes, seascapes and townscapes? Does it conserve and/or enhance dark skies? Does it aim to conserve or enhance the historic environment? Does it promote good design?
Sustainability Objective 2: Conserve and enhance biodiversity, ecological resilience, habitats and habitat connectivity	1, 2, 5, 7,9,12,13,15,24	Does it aim to protect and enhance biodiversity? Would there be an impact on designated sites?

both within and outside designated sites.		
Connection and Cultural Heritage		
Sustainability Objective 3: Enable residents and visitors to access the National Park for physical recreation and volunteering opportunities, balancing against environmental sensitivities.	4,21	<p>Does it promote accessible recreation resources? E.g. foot path links, public transport links or accessibility for those with reduced mobility</p> <p>Does it promote active volunteering opportunities?</p>
Sustainability Objective 4: Conserve and enhance the historic environment and archaeological assets which contribute to the cultural distinctiveness of communities.	2,7,8,14,15,17,18,19,22,24	<p>Does it provide opportunities to increase the use of the Welsh Language and Pembrokeshire Dialects, and promote cultural events?</p> <p>Does it aim to conserve and enhance the historic environment?</p> <p>Does it aim to protect the communities of the National Park from inappropriate development?</p> <p>Does it aim to conserve and enhance community facilities?</p>
Sustainability Objective 5: Promote opportunities for the use of the Welsh language, and conserve and enhance local dialects	18,22	Will there be a positive impact on the use of Welsh language and/or local dialects?
Sustainability Objective 6: Promote and support the mental and physical health and wellbeing of people who live, work and visit	2,4,17,21,20	Does it promote access to green infrastructure, including green spaces for leisure and recreation?

the National Park, promoting healthy and sustainable places.		<p>Does it facilitate access to key services including healthcare?</p> <p>Does it support active travel and improvements to air quality?</p> <p>Does it aim to reduce environmental factors that effect health and well-being?</p> <p>Does it enhance opportunities for volunteering, community engagement, or social interaction?</p>
Communities		
Sustainability Objective 7: Promote a diverse sustainable economy that conserves and enhances the special qualities of the National Park and provides a range of employment opportunities	1,2,5,7,9,11,12,14,16	<p>Does it reflect a regenerative approach towards tourism?</p> <p>Does it have the potential to increase visitor numbers outside of peak season? (reducing the seasonality for many local businesses)</p> <p>Does it promote economic uses that are low impact or promote a green economy?</p> <p>Is there potential for a wider range of sustainable employment opportunities?</p> <p>Would it enhance the vitality and viability of retail centres in line with changing needs?</p>
Sustainability Objective 8: Maximise opportunities for development to	3,15,16,18	<p>Does it promote the provision of housing, including affordable housing?</p>

sustain local communities.		<p>Does it promote the provision or maintenance and enhancement of community facilities?</p> <p>Does it promote economic development that could provide jobs for local people?</p> <p>Does it aim to address the issues of second homes and holiday lets?</p>
Sustainability Objective 9: Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population.	2,3,17,18, 20, 21, 22	<p>Does it aim to conserve and enhance community facilities?</p> <p>Does it facilitate access to key services and facilities?</p>
Sustainability Objective 10: Create inclusive opportunities for all to live in, work in and enjoy the National Park	20,21,24	<p>Does it provide opportunities that will assist in supporting a balanced population?</p> <p>Does it consider specific housing needs? E.g. disabled persons, ageing population, low income households</p> <p>Does it consider protected characteristics?</p> <p>Does it provide opportunities to increase the use of the Welsh language?</p>
Climate and Natural Resources		
Sustainability Objective 11: Mitigate and reduce factors contributing to climate change by	1,2,4, 7, 10	<p>Does it promote the use of renewable energy?</p> <p>Does it promote the efficient use of</p>

reducing greenhouse gas emissions, particularly from transport and energy use to contribute to the target of net zero.		resources e.g. in development of the built environment? Does it the need to travel or promote walking, cycling and public transport or reduce the need to travel by private car?
Sustainability Objective 12: Adapt to the impacts of climate change and build resilience for communities and biodiversity, and to protect public health and well-being.	5, 7, 11,12,13,14, 17	Does it assist communities in becoming more resilient to the effects of climate change? Is it likely to increase the resilience of habitats? Would it avoid development in areas at risk of flooding or coastal erosion?
Sustainability Objective 13: Improve air quality by promoting low impact development that minimises the need to travel (especially by private car)	2,4,10	Does it promote patterns of development that reduce the need to travel? Does it aim to promote sustainable transport? Does it promote renewable energy? Does it encourage low impact economic uses?
Sustainability Objective 14: Conserve and enhance the quality of river and coastal waters, and promote their sustainable use.	1,2,5,7,9,10,12,14,20	Does it aim to protect and enhance the water environment? Does it promote the efficient use of water resources?
Sustainability Objective 15: Conserve and enhance soil quality, including, where possible the protection of best and	5,7	Does it protect the best and most versatile (BMV) agricultural land? Does it help to reduce loss of soils to non-

most versatile agricultural land.		permeable surfaces and reduce erosion?
Sustainability Objective 16: The adverse effects of minerals exploitation in the National Park decline from the present level and the potential biodiversity and landscape gains of existing and former minerals sites are realised and delivered progressively	3, 5, 12,13,14,23	Does it reduce the demand for minerals by promoting the efficient use of or recycling resources? Does it set requirements for remediation of former quarry sites that favour biodiversity and landscape gains?
Sustainability Objective 17: Reduce the negative impacts of waste and support the transition to a circular economy	5,10,12,14	Does it promote the waste hierarchy? Does it promote measures to reduce waste?

Compatibility of objectives and National Park purposes

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

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

In pursuing these purposes National Park authorities shall:

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

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

SA Objective / Purpose/Duty	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
to conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park	✓	✓	✓	✓	✓	0	✓	0	0	✓/-	✓	✓	✓	✓	✓	✓	✓
to promote opportunities for public enjoyment and understanding of the special qualities of the National Park	✓	✓	✓	✓	✓	–	✓	–	✓	✓	✓	✓	–	✓	–	✓	✓
to foster the economic and social well-being of communities living within the National Park	✓	–	✓	✓	✓	✓	✓	✓	–	✓	✓	✓	✓	✓	✓	✓	✓

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

- 5.6 The objectives identified are predominantly compatible with National Park purposes and its duty, and all are relevant to at least one of the three.

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

- 5.7 The Well-being of Future Generations Act 2015 embeds of the principle of sustainable development into all of the work carried out by public bodies and places a requirement on all public bodies to set out how they will progress the 7 well-being goals set out in the Act. As the overarching sustainable development framework for Wales, it is essential that the sustainability appraisal of Pembrokeshire Coast National Park Authority's Local Development Plan 3 has full regard for the Act and its goals. The Local Development Plan Manual (Edition 3) also considers that a sound Local Development Plan must have regard for the Well-being goals⁷ of the Act.
- 5.8 The following table examines the compatibility and coverage between the Sustainability Appraisal Objectives and the 7 well-being goals of the Well-being of Future Generations Act 2015.
- 5.9 The Sustainability Appraisal Objectives are largely compatible with the Well-being goals, with the majority of the goals being contributed to by at least 14 of the Sustainability Appraisal Objectives.

⁷ Local Development Plan Manual Edition 3, page 166, Table 27.

Compatibility with the Well-Being Goals

Well-being Goals	A prosperous Wales	A resilient Wales	A healthier Wales	A more equal Wales	A Wales of cohesive communities	A Wales of vibrant culture and thriving Welsh language	A globally responsible Wales
SA Objectives							
1	✓	✓	✓	✓	✓	✓	✓
2	✓	✓	✓	✓	✓	✓	✓
3	✓	✓	✓	✓	✓	✓	✓
4	✓	✓	✓	✓	✓	✓	✓
5	✓	✓	✓	✓	✓	✓	✓
6	✓	✓	✓	✓	✓	✓	✓
7	✓	✓	✓	✓	✓	✓	✓
8	✓	✓	✓	✓	✓	✓	✓
9	✓	✓	✓	✓	✓	✓	✓
10	✓	✓	✓	✓	✓	✓	✓
11	✓	✓	✓	✓	✓	✓	✓
12	✓	✓	✓	✓	✓	✓	✓
13	✓	✓	✓	✓	✓	✓	✓
14	✓	✓	✓	✓	✓	✓	✓
15	✓	✓	✓	0	0	0	✓
16	✓	✓	0	0	0	0	✓
17	✓	✓	✓	0	0	0	✓

5.10 Inter-compatibility of the Sustainability Appraisal Objectives:

1 (Conserve and enhance landscapes, seascapes, and the built/historic environment)								
2 (Conserve and enhance biodiversity, ecological resilience, habitats and connectivity)	✓							
3 (Enable access to the National Park for recreation and volunteering)	-	0						
4 (Conserve and enhance cultural distinctiveness)	✓	✓	-					
5 (Promote Welsh language and conserve local dialects)	✓	-	-	-				
6 (Promote and support the mental and physical health and wellbeing of people who live, work and visit the National Park)	✓	✓	✓	✓	✓			
7 (Promote a diverse sustainable economy)	✓	✓	✓	✓	✓	✓		
8 (Maximise the contribution of development)	x	x	✓	x	✓	-	✓	

[illegible]

Notes for potentially incompatible objectives:

- 5.11 Objectives 8 (Maximise the contribution of development to sustain local communities) and 9 (Ensure community facilities meet population needs) have the potential to conflict with objectives 15 and 14, which concern the conservation, as development would require resources and land.
- 5.12 Objectives 3(Enable access to the National Park for recreation and volunteering) may conflict with objective 2(Conserve and enhance biodiversity, ecological resilience, habitats and connectivity) if there is increased disturbance.

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

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

SEA Directive	Sustainability Objective (s)
Biodiversity	1, 2, 12, 16
Population	3, 5, 6, 7, 8, 9, 10, 12
Human health	3, 6, 9, 12, 13
Fauna	1, 2, 15
Flora	1, 2, 15
Soil	15
Water	14
Air	11, 13, 16,
Climatic factors	11,12,13
Material assets	9,10
Cultural heritage (including architectural & archaeological heritage)*	1,4,5
Landscape	1, 16

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