

Report of: Strategic Policy Manager

Subject: Report of Consultation on Local Development Plan 3 documents: Sustainability Appraisal incorporating the Strategic Environmental Assessment Scoping Report and Draft Issues, Vision and Objectives Paper.

Decision Required: No

Recommendation:

The Authority is recommended to:

- A. Note the Report of Consultation relating to Local Development Plan 3 Documents Sustainability Appraisal incorporating the Strategic Environmental Assessment Scoping Report and Draft Issues, Vision and Objectives Paper (Appendix A)
- B. Note the changes to the Sustainability Appraisal incorporating the Strategic Environmental Assessment Scoping Report (Appendix B), including appendices on the Review of Relevant Plans, Policies and Programmes and Baseline Information.
- C. Note the changes to the Issues, Vision and Objectives Paper (Appendix C)

1. Key messages

Officers undertook consultation on the Sustainability Appraisal incorporating the Strategic Environmental Assessment Scoping Report and the Draft Issues, Vision and Objectives Paper for the replacement Local Development Plan 3 (LDP 3) for an eight week period from 26 January to 23 March 2026. 11 responses were received and are provided in the Report of Consultation, together with an officer response (see Appendix A). Officers have made amendments to the documents to take into account comments received, where appropriate. Members are asked to note the Report of Consultation (Appendix A) and amendments made to the documents (see appendices B and C).

2. Background

Officers have started work on preparing Local Development Plan 3, and following agreement from Members in December 2025 ([NPA report 51/25](#)), officers undertook public engagement and consultation on the following documents:

Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) Scoping Report

The Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) are both statutory requirements. The initial stage of the SA process is to gain a thorough understanding of the current social, economic, environmental and cultural

well-being context of the National Park and gather baseline data to identify and focus on the significant issues in the National Park. The Scoping Report identifies sustainability issues facing the National Park and establishes a Sustainability Assessment Framework - a set of objectives against which the sustainability of the LDP 3 vision, objectives, strategy, allocations and policies will be judged. Accompanying the Scoping Report is an appendix containing a review of plans, policies and programmes relevant to the Local Development Plan; and a further appendix containing baseline information describing the current conditions in the National Park.

Draft Issues, Vision and Objectives Report

The draft report identifies the main issues and challenges facing the National Park aligned under the following four themes which are identified in the National Park's Corporate Plan and Partnership Plan:

- Conservation
- Connection and cultural heritage
- Communities and
- Climate and natural resources.

The identification of issues has been informed by the review of relevant plans, policies and programmes and baseline information which form the appendices to the SA/SEA Scoping Report. The identification of key issues guided the development of a vision for the plan, presenting the overarching aim of LDP 3 through a focused and positive statement, supported by 16 draft objectives that will deliver the vision.

3. Consultation

It is a statutory requirement to undertake a five-week consultation with Natural Resources Wales and Cadw on the Scoping Report. Guidance by the Welsh Government in The Development Plans Manual (2020) considers it best practice to engage with other key stakeholders and the community on the Scoping Report. Officers undertook public consultation on the draft SA/SEA Scoping Report and draft Issues, Vision and Objectives Paper for an eight week period from 26 January to 23 March 2026.

An email or letter was circulated to contacts on the Local Development Plan Contact List (approximately 1,300 contacts) which included:

- Members of the public, businesses and organisations who are registered
- NPA Members
- Town, City and Community Councils
- Councillors
- Specific Consultation Bodies and General Consultation Bodies as defined in the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended in 2015) and listed in the Delivery Agreement (appendix 4). General Consultation Bodies includes voluntary bodies whose activities benefit the National Park, those which represent the interests of different racial, religious, ethnic, national or disabled groups in the National Park, as well as those which represent the interests of persons

carrying on business and those which represent the interests of Welsh culture.

- Other consultees and key stakeholders who have been identified and have an interest in the National Park as listed in the Delivery Agreement (appendix 4).

The documents were available to download from the Authority's website and could be viewed online at local libraries.

Eleven responses were received to the consultation. A Report of Consultation (Appendix A) summarises the responses and sets out officers' comments on the representations received. No fundamental issues were raised during the consultation. The revised documents are attached at Appendices B and C, with tracked changes showing the amendments made in response to consultation feedback. Key changes made following consultation include:

- Amendments to the Scoping Report to provide greater clarity on the Sustainability Appraisal (SA) process and the explanation of identified issues. A new Issue 25, *Retaining Young People and Supporting an Ageing Population*, has been added, together with additional decision-aiding questions under the SA objectives.
- Updates to Appendix A: Review of Relevant Plans, Policies and Programmes, with the addition of a small number of documents
- Updates to Appendix B: *Baseline Information*, including additional information on the Welsh Index of Multiple Deprivation, transport and coastal bus routes, water quality, and the Shoreline Management Plan (Epoch 2).
- Minor amendments to the Key Issues, Vision and Objectives Paper to provide greater clarity on the identified key issues. No new issues were identified, no significant changes were made to the issues previously identified, and no amendments were made to the vision or objectives.

Engagement

All consultees were invited to attend an online engagement event, providing an opportunity to learn more about the documents and ask questions. Three participants attended the event and a note of the meeting is provided in the Report of Consultation (Appendix A).

An online presentation was also delivered to the Pembrokeshire Coast National Park's Partnership Forum in March. Members of the Forum were invited to complete a short questionnaire to support early engagement in the preparation of LDP 3. The questionnaire sought views on the key issues, pressures and long-term challenges affecting the National Park, helping to inform the evidence base for the emerging Plan. A note of the meeting is included in the Report of Consultation (Appendix A).

4. Strategic Policy Context

Each Local Planning Authority is required by the Planning and Compulsory Purchase Act 2004, to prepare a Local Development Plan (LDP) for their area to set out the strategy and policy framework for the development and use of land. The Pembrokeshire Coast National Park Authority is in the early stages of preparing the replacement LDP 3 to guide land use and development in the National Park over a

15-year period. Alongside Future Wales: The National Plan 2040, upon adoption, LDP 3 will form the development plan under the provisions of Section 38(6) of the Planning and Compulsory Purchase Act 2004 which requires planning decisions to be made in accordance with the development plan, unless material considerations indicate otherwise.

The SA/SEA Scoping Report and Draft Issues, Vision and Objectives Paper have been informed by a review of relevant plans, policies and programmes and baseline information set out in the appendices to the SA/SEA Scoping Report. The identified issues are grouped under the same four themes of the Corporate and Partnership Plans.

The LDP will be subject to independent examination against three tests of soundness. Soundness test 1: Does the plan fit? requires the LDP to be consistent with relevant national, regional and local strategies and plans, including the National Park Partnership Plan and Pembrokeshire's Well-being plan. Soundness test 2 considers whether the plan is appropriate in light of the evidence and the third test assess whether the plan will deliver.

5. Financial Considerations

The documents have been prepared by the Strategic Policy team and engagement and consultation was undertaken within existing budget allocations for the LDP 3 process.

6. Risk and Compliance Considerations

In accordance with section 62(1) of the Planning and Compulsory Purchase Act (2004), the Authority is required to prepare an LDP. LDP 3 will be prepared in accordance with The Town and Country Planning (Local Development Plan) (Wales) Regulations 2015 (as amended) and guidance contained in the Development Plans Manual 2020 (edition 3).

The Sustainability Appraisal is required under the Planning and Compulsory Purchase Act 2004 (section 62(6)) and the Town and Country Planning (LDP) (Wales) Regulations 2005 (as amended in 2015), with associated guidance in the Development Plans Manual (Edition 3, 2020). The SEA is required under the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004, which transposes the European SEA Directive (2001/42/EC) into UK law. Regulation 12 requires the Authority to consult specified consultation bodies, namely Cadw and NRW on the scoping report for a period of five weeks. The Development Plans Manual considers it best practice to engage wider stakeholders and the community on the consultation.

The independent examination will assess the LDP against the three tests of soundness. Soundness Test 1: Does the plan fit? Requires the LDP to be consistent with other plans. The LDP is required to be in general conformity with higher level plans, including Future Wales: The National Plan 2040 and any emerging Strategic Development Plan (Planning and Compulsory Purchase Act 2004, Section 62 3(A), inserted by the Planning (Wales) Act 2015). The LDP should also be consistent with local strategies, including the National Park Corporate Plan 2023/24-26/27,

Partnership Plan 2025-2029, the Pembrokeshire Well-being Plan 2023-2028 and the South West Wales Area Statement (prepared by Natural Resources Wales) which is demonstrated in the Issues, Vision and Objectives Paper.

7. Impact on our Public Sector Duties

7.1 Integrated Impact Assessment Completed: No. The preparation of LDP 3 will be assessed against the SA and SEA framework which has been developed in the SA/SEA Scoping Report. Other statutory impact assessments will also be undertaken to assess LDP 3 at the Preferred Strategy stage and will include an Equalities Impact Assessment, Welsh Language Impact Assessment and a Health Impact Assessment, together with consideration of alignment and compliance with the Wellbeing of Future Generations (Wales) Act 2015 and Socio-Economic Duty.

7.2. Equality, Socio- Economic Duty, Human Rights

The Public Equality Duty requires the Authority to have due regard to the need to eliminate discrimination, promote equality of opportunity and foster good relations 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).

In relation to the SA/SEA Scoping Report, the baseline information includes data on the nine protected characteristic groups. The preparation of LDP 3 will be subject to a separate Equalities Impact Assessment, which is not required at this stage in the process and will be prepared alongside preparation of the Preferred Strategy.

The undertaking of a public consultation on the SA/SEA Scoping Report and the Draft Issues, Vision and Objectives paper has exceeded the legislative requirements as consultation is not a statutory requirement but is considered best practice.

7.3 Welsh language considerations

It is a requirement for the SA to include an assessment of the likely effects of the plan on the use of the Welsh language in the area of the authority (Section 62 (6) Planning and Compulsory Purchase Act 2004 as amended by the Planning (Wales) Act 2015). The SA/SEA Scoping Report identifies Welsh language and cultural distinctiveness as an issue, with data from the 2021 Census recording a decrease in the percentage of usual residents that could speak Welsh from 21.5% in 2011 to 19.4% in 2021, a decrease of 2.1%. There are, however, communities in the National Park where the proportion of Welsh speakers is substantially higher. The SA/SEA Assessment Framework contains a specific objective relating to Welsh language, and reads:

- Sustainability Objective 5: Promote opportunities for the use of the Welsh language, and conserve and enhance local dialects.

The LDP 3 vision, objectives, strategy, policies and proposals will be assessed against the SA Framework which will include an assessment of their impact on the use of the Welsh language.

The consultation exercise was carried out in accordance with the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards Regulations (No.1) 2015 with documents made available bilingually. A questionnaire invited comments on the impact of the proposals on the Welsh language. Two responses were received via the questionnaire. None of the responses submitted via the questionnaire addressed the questions relating to the impact on the Welsh language (Questions 6, 7, 14 and 15).

A Welsh Language Impact Assessment for LDP 3 Preferred Strategy will be undertaken in accordance with the Welsh Language (Wales) Measure 2011 and The Welsh Language Standards Regulations (No.1) 2015. The WLIA will examine how to increase positive effects and decrease adverse effects on the Welsh language and opportunities for people to use the Welsh language. A statement will be included in the Deposit Plan on how the Welsh language has been considered and addressed within LDP 3.

7.4 Biodiversity Duty and Decarbonisation

The Environment (Wales) Act 2016 introduced the biodiversity and resilience of ecosystems duty (the Section 6 Duty), requiring public authorities exercising functions in relation to Wales to seek to maintain and enhance biodiversity and, in doing so, promote the resilience of ecosystems. The Environment (Principles, Governance and Biodiversity Targets) (Wales) Act 2026 builds on this framework by establishing environmental governance arrangements and a statutory biodiversity target-setting framework aimed at halting and reversing biodiversity decline and restoring biodiversity to resilient levels. Planning authorities must seek to maintain and enhance biodiversity through the exercise of their functions, contributing to both the Section 6 Duty and Wales' biodiversity targets. As recognised in Planning Policy Wales, the delivery of multifunctional green infrastructure is an important mechanism through which local planning authorities can fulfil these duties and objectives.

The SA/SEA is required to assess the likely significant effects of the plan on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.

The SA/SEA Scoping Report identifies a number of issues relating to biodiversity and decarbonisation, which has informed the following SA objectives, against which the plan's vision, objectives, strategy, policies and proposals will be assessed. Objectives 1, 2, 14, 15, 16 and 17 relate to the environment and decarbonisation.

The Issues, Vision and Objectives Paper identifies four key themes. Biodiversity is embedded in the 'Conservation' theme and decarbonisation is embedded through 'Climate and Natural Resources'. The paper identifies key issues under the themes which has informed the plan's vision and objectives.

The Authority is also required to undertake a Habitats Regulation Assessment for LDP 3 to identify the likely significant effects of the plan on the National Site Network which includes Special Areas of Conservation (SAC) and Special Protection Areas (SPAs).

In 2019 the Welsh Government declared a climate emergency. The methods of engagement undertaken included an online engagement sessions which minimised the need to travel.

7.5 Well-being of Future Generations (Wales) Act

The SA/SEA Scoping Report (paragraphs 5.7 to 5.12), the Issues, Vision and Objectives Paper (appendix 2 and 3) demonstrate alignment with the Well-being Goals for Wales and the five Ways of working under the Well-being of Future Generations (Wales) Act 2015.

8. Conclusion

Members are recommended to note the Report of Consultation (Appendix A) and amendments to the SA/SEA Scoping Report (appendix B) and Issues, Vision and Objectives Paper (appendix C).

9. Background Documentation

- Report of Consultation (Appendix A)
- Sustainability Appraisal incorporating the Strategic Environmental Assessment Scoping Report (Appendix B) including appendices on the Review of Relevant Plans, Policies and Programmes and Baseline Information.
- Issues, Vision and Objectives paper updated following consultation (Appendix C)
- [Sustainability Appraisal \(incorporating Strategic Environmental Assessment\) Scoping Report: Appendix A – Review of Relevant Plans, Policies and Programmes](#)
- [LDP 3 Sustainability Appraisal \(incorporating Strategic Environmental Assessment: Scoping Report Appendix B – Baseline Information\)](#)

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Pembrokeshire Coast National Park Authority

Report of Consultation – June 2026

Local Development Plan 3:

Integrated Sustainability Appraisal (SA) and Strategic
Environmental Assessment (SEA) Scoping Report, and

Draft Issues, Vision and Objectives Report

Consultation period: 26 January to Monday 23 March 2026

1.



Parc Cenedlaethol
Arfordir Penfro
Pembrokeshire Coast
National Park

1. Introduction

The Pembrokeshire Coast National Park Authority (PCNPA) undertook public consultation on the following planning documents to inform the preparation of Local Development Plan 3 (LDP 3):

- Sustainability Appraisal (SA) incorporating the Strategic Environmental Assessment (SEA) Scoping Report, including appendices covering the Review of Relevant Plans, Policies and Programmes (Appendix A) and Baseline Information (Appendix B) and;
- Draft Issues, Vision and Objectives Paper.

The purpose of the consultation was to invite comments from stakeholders, statutory consultees and the wider public on the scope, evidence base and emerging direction of LDP 3.

Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) Scoping Report

The Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) are both statutory requirements. The initial stage of the SA process is to gain a thorough understanding of the current social, economic, environmental and cultural well-being context of the National Park and gather baseline data to identify and focus on the significant issues in the National Park. The Scoping Report identifies sustainability issues facing the National Park and its people and establishes a Sustainability Assessment Framework - a set of objectives against which the sustainability of the LDP 3 vision, objectives, strategy, allocations and policies will be judged. Accompanying the Scoping Report is an appendix containing a review of plans, policies and programmes relevant to the Local Development Plan; and a further appendix containing baseline information describing the current conditions in the National Park.

Draft Issues, Vision and Objectives Report

The draft report identifies the main issues and challenges facing the National Park aligned under the following four themes which are identified in the National Park's Corporate Plan and Partnership Plan:

- Conservation
- Connection and cultural heritage
- Communities and
- Climate and natural resources

The identification of issues has been informed by the review of relevant plans, policies and programmes and baseline information which form the appendices to the SA/SEA Scoping Report. The identification of key issues has guided the development of a vision for the plan, presenting the overarching aim of LDP 3 through a focused and positive statement, supported by 16 draft objectives that will deliver the vision.

2. Consultation Process

It is a statutory requirement to undertake a five-week consultation with Natural Resources Wales and Cadw on the Scoping Report. Guidance by the Welsh Government in The Development Plans Manual (2020) considers it best practice to engage with other key stakeholders and the community on the Scoping Report.

The Authority undertook public consultation on the SA/SEA Scoping Report and Draft Key Issues, Vision and Objectives Paper for an eight week period from 26 January until 5.00pm on Monday 23 March 2026. An email or letter was circulated to approximately 1300 contacts on the Local Development Plan Contact List which includes statutory consultees, key stakeholders, targeted groups and members of the public to inform them on the consultation, including City, Town and Community Councils, National Park Authority Members and Councillors.

All consultation documents were made available to view and download on the Pembrokeshire Coast National Park Authority website. Paper copies were available on request, subject to a charge.

The consultation webpage was accessible via the following link:

- LDP 3 SA and SEA Scoping Report (including appendices) and LDP 3 Draft Issues, Vision and Objectives Paper:
<https://www.pembrokeshirecoast.wales/planning/planning-policy/ldp-3-consultations/>

Respondents were encouraged to submit comments via the online questionnaire available on the LDP 3 consultation webpage. Comments were also accepted in

writing by post or via email to the Strategic Policy Team. All responses received within the consultation period have been considered and are summarised within this report.

QUESTIONNAIRE

To support the consultation process, a structured questionnaire was developed to gather feedback on the consultation documents. The questions included were as follows:

Scoping Report questions:

1. Do you agree with the issues identified in the Scoping Report?
2. Does the Sustainability Appraisal / Strategic Environmental Assessment Framework adequately cover the issues identified?
3. Are the appropriate documents identified in the Review of Relevant Plans, Policies and Programmes (Appendix A)? If you answered No, please list which document(s) should be included and where they can be accessed:
4. Does the Baseline Information (Appendix B) include the main sources of data? If you answered No, please describe what additional baseline information should be included and where it can be obtained:
5. Are there any other comments you would like to make about the SA/SEA Scoping Report or its appendices?
6. In your opinion, what are the likely positive or adverse effects of the document on the Welsh language? We are particularly interested in impacts on: Opportunities to use the Welsh language | Whether the Welsh language is treated less favourably than English. Please provide comments below:
7. In your opinion, could the document be changed to: Have positive or more positive effects on the use of the Welsh language and ensure it is not treated less favourably than English? Mitigate any negative effects on the use of the Welsh language or on equality between Welsh and English? Please provide comments:

Draft Issues, Vision and Objectives questions:

8. Are the issues identified clearly communicated?
9. Do you agree with the issues identified?
10. Do you wish to add or remove any issues? If you answered Yes, please expand on your answer below:
11. Does the draft vision appropriately respond to the issues identified?
12. Do you wish to make any further comments about the draft vision?
13. Do you support the draft objectives?

14. Are there any changes you would like to propose to the draft objectives? If you answered Yes, please provide details:
15. In your opinion, what are the likely positive or adverse effects of the document on the Welsh language? We are particularly interested in impacts on: Opportunities to use the Welsh language | Whether the Welsh language is treated less favourably than English. Please provide comments below:
16. In your opinion, could the document be changed to: Have positive or more positive effects on the use of the Welsh language and ensure it is not treated less favourably than English? Mitigate any negative effects on the use of the Welsh language or on equality between Welsh and English? Please provide comments:

3. Consultation responses

A total of 11 responses were received, of which two were submitted via the questionnaire and the remaining by email. None of the responses submitted via the questionnaire addressed the questions relating to the impact on the Welsh language (Questions 6, 7, 14 and 15). The responses received are provided in Appendix A, together with the officer's response.

4. Engagement

An online engagement event was held via Microsoft Teams on Monday 9 February at 7pm, providing an opportunity for participants to engage, learn more about the documents and ask questions. Attendees were able to request Welsh language participation, with translation services provided where required. Three people attended the online engagement. A note of the meeting is provided in Appendix B. Officers recorded the presentation which was uploaded to the Authority's website for any member of the public to view.

An online presentation was held for the Pembrokeshire Coast National Park's Partnership Forum via Microsoft Teams on Thursday 19 March. Approximately 14 stakeholders in the Partnership Forum were invited to engage through a short questionnaire and discussion to support early engagement in the preparation of LDP 3. The questionnaire sought partner views on key issues, pressures and long-term challenges affecting the National Park, helping to inform the evidence base for the emerging LDP 3. A note of the meeting is provided in Appendix C.

Appendix A: Consultation Responses

Responses relating to Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) Scoping Report

Response from Natural Resources Wales (NRW)

NRW's comments:	Officer Response:
<p>SA/SEA Process NRW notes that the SA/SEA process described in bullet points 1.5 includes: scoping, assessment of strategic options, assessment of policies and production of a sustainability statement. The description of the process (page 12) of the Delivery Agreement differs to that proposed by the scoping report. NRW considers the approach in the Delivery Agreement to be more comprehensive, as it allows for the production of Initial and Final SA Reports, reflects statutory consultation feedback, and includes a post adoption statement. This approach is welcomed.</p>	<p>Bullet points in 1.5 have been updated to provide greater detail on the SA/SEA process for consistency with information in the Delivery Agreement.</p>
<p>NRW advises that monitoring arrangements are not clearly described in either document and require clarification.</p>	<p>Indicators for monitoring the LDP and SA/SEA are being considered and proposals for monitoring will be included in future consultations.</p>
<p>Issue 1 – Climate Change NRW welcomes the identification of climate change as a key issue but advises that it should be more fundamentally integrated across the plan rather than treated as a standalone issue.</p>	<p>One of the key purposes of the SA/SEA Scoping report is to identify the sustainability issues. The issues identified have then been used to create a framework of Sustainability Appraisal Objectives. The Authority is proposing two SA Objectives on climate change, in assessing the proposals of LDP 3 against these objectives the process will help to better embed the issue of climate change within the plan.</p>
<p>While the report refers to more frequent and intense rainfall and hotter, drier summers, NRW identifies additional impacts that are not sufficiently addressed, including impacts on water resources, river flows, public water</p>	<p>Agreed and the suggested text has been added to issue 1: Climate Change</p>

<p>supply resilience, storm overflow operation, wildfire risk and health impacts on vulnerable groups.</p>	
<p>NRW highlights that abstraction from surface and groundwater is regulated and that water availability in the Cleddau catchments is limited, with most water already committed, particularly to public supply. Sufficient flows are required to protect ecology, especially in low summer conditions. NRW advises that efficient water use should be promoted across all sectors, including agriculture, noting both potential positive and negative impacts of climate change on farming.</p>	<p>Agreed. The Authority has included SA Objective 14 on the water environment, which will be used to inform LDP 3 policy development and aim for the best outcomes for the water environment.</p>
<p>NRW notes that Dŵr Cymru/Welsh Water models climate change scenarios through its Water Resource Management Plans to ensure resilience of public supply.</p>	<p>Noted.</p>
<p>Issue 5 – Protection of the Physical Environment NRW advises that some of the text under this issue is unclear and contains repetition.</p>	<p>Agreed, text has been amended.</p>
<p>NRW notes that Water Framework Directive classifications presented are not up to date and should be updated to Cycle 3 (Interim 2024). NRW clarifies that:</p> <ul style="list-style-type: none"> • the Cleddau rivers are classified as “At Risk” for both salmon and sea trout, the worst classification category, due to consistent downward trends in fish numbers; • the River Nevern is classified as “Probably at Risk”. 	<p>Text has been updated.</p>
<p>NRW identifies key pressures on ecological status, including diffuse and point source pollution, physical modifications to river channels and banks, floodplain disconnection, barriers</p>	<p>Text has been updated.</p>

<p>to fish passage, habitat disruption and alien species.</p>	
<p>NRW advises that water quality is also assessed as part of SAC condition monitoring under the Habitats Regulations, with phosphate being a key attribute. NRW notes condition assessments of Marine SACs is included in Appendix B but not referred to in the issue, water quality of the riverine SACs is in the scoping report but not in Appendix B suggesting inconsistencies. The challenge of requiring nutrient neutrality is a significant issue and could be better referenced under issue 9 (Marine Environment).</p>	<p>Noted for HRA inclusion.</p> <p>Reference to Marine SACs to be added to Issue 9.</p>
<p>Issue 6 – Reconciling Energy Development with Landscape Considerations NRW suggests that this issue could also reference the wider impacts of energy development, including benefits to the local economy, skills, employment opportunities and retention of young people within the county.</p>	<p>Disagree, this issue specifically concerns the landscape. Matters of the economy and demography are covered under other issues.</p>
<p>Issue 9 – Marine Environment Suggest greater clarity regarding land-use practices that impact the marine environment, specifically:</p> <ul style="list-style-type: none"> • Differentiating between agricultural practices and built environment development. • Referencing condition assessments that show Marine SAC features are in "unfavourable" condition due to Dissolved Inorganic Nitrogen (DIN) and biological failures. 	<p>Agree in part, amendments will include references to other issues that cover these aspects in more detail.</p>
<p>Technical Corrections and Updates NRW identifies a number of specific updates required, including:</p> <ul style="list-style-type: none"> • deletion of reference to “Control of Agricultural Pollution (Wales) 2021” under Issue 7; • updating Bathing Water data to 2025 results; 	<p>Agreed, amended.</p>

<ul style="list-style-type: none"> • updating Shoreline Management Plan mapping, as current Epoch 1 will expire before LDP3 takes effect; • updating all WFD data and references to Cycle 3 (Interim 2024); • updating references to State of Natural Resources Report 2025 (SoNaRR 2025). 	
<p>Sustainability Objectives (SO's)</p> <p>Conservation (SO 1 & 2): These objectives should include decision-making questions on meeting binding biodiversity targets (such as Wales' 30 by 30 commitment) and fulfilling Section 6 duties on biodiversity and ecosystem resilience.</p>	<p>Agree in principle. However, this would be more appropriate in the monitoring framework. Targets and duties may change over the lifetime of the plan, and this would allow for flexibility in what we use to monitor the plan's impact on biodiversity.</p>
<p>Community and Economy (SO 8):</p> <p>SO 8 should test whether proposals support skills development, innovation and entrepreneurship that use the Park's natural resources responsibly, including sustainable design that responds to both nature and climate crises.</p>	<p>The LDP will include a policy on Sustainable Design, as plans are required to do so by PPW. However, it is unlikely that enough detail would be available for a site for economic uses at this strategic plan level to make any informed judgments on whether it would support skills development, innovation etc.</p>
<p>Offsetting and Betterment: A key crosscutting question should be whether development enables or encourages innovative offsetting or environmental betterment, driving restoration and preventing environmental deterioration.</p>	<p>See above.</p>
<p>Cross-linking Sustainability Objectives: Although addressed under Climate and Natural Resources, sustainable design should clearly link across objectives. SO 8 should also connect to Climate and Natural Resources issues 19, 20 and 21 in the summary table.</p>	<p>The SEA legislation identifies a number of key topics that must be covered. Whilst there are clear links between the criteria in the assessment framework they also need to be clear and specific. No change made.</p>
<p>Climate and Natural Resources (SO 14) This objective should as: Does it enable mechanisms to offset or mitigate the</p>	<p>Flooding and coastal erosion are addressed under SA Objective 12.</p>

<p>impact of development and/or to avoid deterioration and to restore habitats for nature's recovery? NRW strongly suggest SO 14 addresses coastal erosion as well as flooding.</p>	<p>Habitats are covered under SA Objective 2.</p>
<p>Consideration should be given to combining SO 3 and 6.</p>	<p>SO3 is to enable residents and visitors to access the National Park for physical recreation and volunteering opportunities, whereas SO6 is a broader objective relating to supporting mental and physical health and wellbeing. Health is influenced by a broader range of factors than physical recreation, but access to housing, community services and facilities, transport, active travel etc</p>
<p>Section 4: Identification of Sustainability Issues</p> <p>Climate change The country is expected to experience more frequent and intense rainfall, hotter drier summers which impacts on agriculture and land management</p> <p>The impacts are much wider than on agriculture and land management. High rainfall leading to saturated land, particularly extending over long periods, poses a significant threat to landscape trees and hedgerows causing high levels of root damage. These trees are then weakened and become vulnerable to storm damage and loss and climate change is also increasing the frequency and intensity of these. Storm damage in recent years has already led to loss of trees important for landscape character and the natural beauty of the National Park. Furthermore changes in weather patterns are also increasing the prevalence and spread of plant pathogens and pests that are further impacting survival and prevalence of landscape trees.</p>	<p>*</p> <p>See above for earlier comment on Issue 1. The majority of issues raised regarding the impacts of climate change are covered under issue 1 and reference to the threat to landscape character has been added.</p>

<p>Impact of recreation and tourism development</p> <p>We note car parking matters are highlighted under issue 4 – however carparking needs relating to tourism and leisure as opposed to community and residential needs are separate matters. Both need to be considered.</p> <p>A link to the hotspots identified in this section is required. How do these relate to your landscape sensitivity assessment Microsoft Word - PCNP caravan and camping study final report 131115 text.doc and supplementary planning guidance? Caravan and Caravan and Camping Supplementary Planning Guidance completed</p>	<p>This is now included under Issue 2 (Impact of recreation and tourism, and associated development).</p> <p>Hyperlink added. These hotspots are recreation related, there is no direct link to the Landscape Character Assessment or Caravan and Camping SPG, they were identified through a separate process under the National Park Management Plan/Partnership Plan.</p>
<p>Landscape sensitivity to development</p> <p>NRW welcome reference to the Landscape sensitivity and visibility mapping update. You may wish to reference all/any sensitivity studies /assessments that you have commissioned yourselves (as above) and which relate specifically to PCNP including Seascape PCNP, and your Landscape Character Areas Assessment data sheets LCA overview (1).pdf LCAIntroFinal2011E.pdf</p>	<p>Added.</p>
<p>Reconciling energy development with landscape considerations</p> <p>We advise some reference to offshore wind sensitivity assessment Offshore Wind Sensitivity Guidance Stage 2 Report - Guidance on Siting Offshore Windfarms, Report No 330 Microsoft Word - Seascape and visual sensitivity to offshore windfarms Stage 2 report final sw 090519 and Stage 3 Report - Seascape and Visual Sensitivity Assessment for Offshore Wind Farms, Report No 331 Microsoft Word - Stage 3 final sw 310519 (NRW/ White Associates) which sets out the sensitivity assessment approach required for offshore wind.</p>	<p>These documents will be added to the review of plans and programmes but not to this issue.</p>

<p>Role of agriculture (and other land based businesses) This section should also include the potential of agricultural buildings and infrastructure to also impact on landscape, tranquillity and dark skies (for example large sheds with lighting throughout the night).</p> <p>Effects of modern farm vehicles and requirement for access through traditional narrow lanes also has potential to impact on the sustainability of landscape character particularly where traditional hedge banks and stone gateways are damaged or removed to accommodate modern scale machinery. Removal of hedgerows and trees within agricultural settings should be included.</p>	<p>Disagree, the issue contains sufficient detail to identify the role of agriculture as it pertains to the scope of the Local Development Plan</p>
<p>The future of the built environment We would expect this section to signpost towards green and blue infrastructure and also to point to the role of landscape-led design and advances in sustainable drainage systems to protect the built environment in a more sustainable way.</p>	<p>This section is about identifying issues and not identifying solutions.</p>
<p>The use and condition of the marine environment We welcome the inclusion of the scenic value of the marine environment and recommend landscape sensitivity assessments of seascapes with reference to Seascape Character areas should be in scope.</p>	<p>Noted.</p>
<p>Domestic and commercial resource use Landscape restoration should be included here.</p>	<p>The issue identified is landscape degradation.</p>
<p>Important landscape resources The statutory purpose of the National Park is not only to conserve and protect the designated landscape but is also to enhance natural beauty. This means going beyond protecting the current</p>	<p>Noted.</p>

<p>state to include positive management actions and policies that e.g.:</p> <ul style="list-style-type: none"> • actively improve landscapes, • restore damaged landscapes, • enhance features that define the landscape and • to support and encourage measures to improve scenic quality. This role is identified in Section 5.5 but should also be reflected within this section and should link to the PCNPA Management Plan and policies. 	
<p>Quality of employment opportunities Rural enterprise and traditional land based skills which impact on the conservation and enhancement of the National Park are relevant here.</p>	Noted.
<p>Accessibility of the National Park as a recreational resource for all sectors of society and the opportunity of the National Park to improve health and well-being Access to Public Rights of Way, Open Access Land and named trails and routes including cycleways should be in scope.</p>	* This issue is considered under SO 3.
<p>Welsh language and cultural distinctiveness Where landscapes of high value contribute to Welsh culture and distinctiveness this should be referenced e.g. links to the Welsh Poet Waldo Williams etc.</p>	Noted.
<p>Demand for minerals The approach to landscape restoration of mineral sites and post industrial sites more widely should be included in scope.</p>	Post industrial sites have not been identified as an issue as are very few brownfield sites.
<p>The national role of the National Park in establishing awareness, appreciation and understanding of its special qualities NatureScot has produced guidance on assessing the effects of Special Landscape Qualities for consideration in National Parks Special Landscape</p>	Noted.

<p>Qualities - Guidance on assessing effects NatureScot. We welcome your background paper on Special Qualities here Background Paper on Special Qualities Background Paper on Special Qualities and its links to LANDMAP and evaluation of visual and sensory landscapes.</p>	
<p>Section 5.0 Sustainability Objectives Objective 1: Dark Skies and Tranquillity Does it conserve and/or enhance dark skies? This should include tranquillity.</p>	<p>Agreed, amended</p>
<p>Objective 7: Rural Enterprise and Land Management</p> <p>This may require a question does the LDP support and enable appropriate rural enterprise? Bearing in mind that conservation and enhancement of the existing mosaic of small farms and enterprises is essential to protect the integrity of small scale landscapes with smaller field units and open common land and moors on upland, policies that help resist the conglomeration of smaller holdings or increase scale of fields/removal of boundary hedges etc would protect the landscape qualities of PCNP. One Planet and Rural Enterprise dwellings fit with this approach.</p>	<p>Added a decision aiding question under SO 7: Does it support and enable appropriate rural enterprise?</p>
<p>Objective 11: Renewable Energy Does it promote the use of renewable energy? This should include a caveat that supports promotion of renewable energy without harming landscape character or special qualities.</p>	<p>The landscape character and special qualities is covered by SA Objective 1, each SA Objective will be considered during the assessment, no amendment necessary.</p>
<p>Objectives 12 and 14: Water Quality, Flooding and Resilience Would it avoid development in areas at risk of flooding or coastal erosion? It is unclear whether these objectives adequately address shoreline management, nature-based solutions and visual impacts, or the protection of communities and landscapes at risk from flooding and coastal erosion,</p>	<p>The SA Objectives will all be used to assess the LDP. The policies of the LDP would be used as the framework for decision making for planning applications.</p>

including existing settlements as well as new developments?	
The table at 5.10 indicating Inter-compatibility of the Sustainability Appraisal Objectives flags some areas of incompatible objectives (page 35). We advise that in addition to these, promotion of low carbon energy infrastructure (included in Objective 11) may not always be compatible with Objective 1 due to the potential of visual harm to landscape.	Agreed and amended.
5.13 seems to scope very narrowly how the SEA Directive relate to the Sustainability Objectives. Further clarification as to how or why this is scoped as described is required as the relationship between many/most of the SEA Directives cut across the Sustainability Objectives as described above.	Disagree. The factors listed in paragraph 5.13 are those factors which are listed and required in Annex I (f) to the SEA Directive to be assessed in an SEA. The SEA topics are covered adequately, clarification on the significant effects and interactions between topics will be providing during the assessment process.

Response from Pembrokeshire County Council

Pembrokeshire County Council's comments	Officer response
Dependence on private cars (Page 15, Issue 4) : Describing Pembrokeshire simply as "rural" overlooks its many urban areas, including some within the National Park. While rurality is significant, there are real opportunities for walking, cycling and public transport, supported by adapted services such as Fflecsi and Coastal buses.	Added "predominantly" to the first sentence in this issue. Also added reference that active travel and public transport can have a range of benefits.
Agricultural land and importance of farming (Page 17, Issue 7) : Additional text could note the high proportion of Best and Most Versatile (BMV) land within the PCNPA, which helps explain the prominence of agriculture in Pembrokeshire, as BMV land is far rarer elsewhere in Wales.	Detail on these topics is provided under issues 5 and 9.

<p>Nitrogen pollution terminology and practices (Page 17, Issue 7, paragraph 2):</p> <p>Rather than referring separately to ammonia and nitrates, it would be clearer to use DIN, which includes nitrates, nitrites and ammonia. The method of nitrogen application is also relevant, as foliar spraying can reduce runoff to rivers compared with pellet application to soils.</p>	
<p>Agriculture and water pollution (Page 18, Issue 9, paragraph 2):</p> <p>Agriculture should be explicitly included as a major contributor of nitrogen-related pollutants entering the Haven Waterway.</p>	<p>Agreed. Added the following wording: Agriculture is likely to be the largest contributor to these nutrient issues but other lands uses, such as housing developments could also contribute to this. Further data on source apportionment is required to fully understand the problem.</p>
<p>Quarries in the National Park (Page 23, Issue 23):</p> <p>While some working quarries are nearing the end of their operational lives, the situation is mixed. End dates for mineral extraction range broadly from 2026 to 2042, and some sites will require interim ROMP reviews.</p>	<p>Comment noted, no change required.</p>

Response from a private individual

Comments	Officer response
<p>Gaps in identified sustainability issues (Section 4):</p> <p>Several key issues are missing, including an ageing population, the loss of young people, lack of age friendly community environments, limited uptake of placemaking within National Park communities, insufficient local food self-sufficiency, infrastructure inadequacies, and the wider impacts of the Middle East war.</p>	<p>Limited data exists for the issues being described. Additionally, An additional issue 25 has been added on retaining young people and supporting an ageing population. The National Park Authority is awaiting the release of demographic data from Welsh Government. Issues of local food self-sufficiency and wider global issues is not within the scope of the Local Development Plan. Reference is made under issue 9 (the use and condition of the marine environment) and issue 10 (domestic and commercial resource use) regarding wastewater disposal.</p>

<p>Missing sustainability objectives (Section 5): Placemaking and the creation of Age Friendly Communities are not included as Sustainability Objectives within the Sustainability Assessment Framework.</p> <p>Scope of Sustainability Objective 8 (Section 5): Objective 8 currently focuses on landscape sensitivity, affordable housing, employment quality, and second/holiday homes. It is suggested that issues around access to services (Issue 17) and Welsh language and cultural distinctiveness (Issue 22) should also be included.</p>	<p>A decision aiding question has been added under Sustainability Objective 8: Maximise opportunities for development to sustain local communities to read: Does it support the needs of an ageing population?</p> <p>Access to services is within Sustainability Objective 9: Community facilities continue to meet the needs of the National Park population. Issues on Welsh language and cultural distinctiveness are addressed with specific SA Objectives (4 and 5).</p>
<p>Proposed additions to Sustainability Objective 8: Objective 8 should be expanded to explicitly encourage placemaking, cooperation with suppliers to deliver necessary infrastructure, the creation of Age Friendly Communities, and greater self-sufficiency in food production.</p>	<p>A decision aiding question has been added under Sustainability Objective 8: Maximise opportunities for development to sustain local communities to read: Does it support the needs of an ageing population?</p> <p>Placemaking is covered by multiple SA Objectives.</p>
<p>Potential conflicts between objectives: Objectives relating to sustaining communities and providing facilities (Objectives 8 and 9) may conflict with conservation objectives (Objectives 14 and 15), as development requires land and resources. This tension has been a long-standing issue for Newport, raising questions about how sustainable growth can be achieved while meeting conservation goals.</p>	<p>The inter-compatibility of the Sustainability Appraisal Objectives is assessed in paragraph 5.10.</p>

Responses relating to Scoping report, Appendix A: Review of relevant plans, policies and programmes

Response from Natural Resources Wales (NRW)

NRW's comments	Officer response
<p>Policy selection and prioritisation: While the Scoping Report notes that the list of policies may evolve, it is unclear why certain policies are prioritised over others listed in Appendix A. Given the National Park's statutory purposes, policies relating to functional and aesthetic landscape matters should be clearly in scope and given priority.</p>	<p>No priority is given in Appendix A. It includes those plans, policies and programme which are considered relevant to the LDP.</p>
<p>Welcomed inclusions: The inclusion of the European Landscape Convention (2000) and good practice guidance on Dark Skies is supported.</p>	<p>Noted.</p>
<p>Seascapes: The NRW National Seascape Assessment for Wales should be added to Appendix A and/or reflected in the Baseline (Appendix B), and used to inform LDP policies affecting Pembrokeshire Coast National Park seascapes.</p>	<p>Added.</p>
<p>TAN 14: Coastal Planning (2021) should be included, as it provides important guidance on marine and coastal development, including visual impacts from land and sea, physical processes, ground conditions, and conservation sensitivities.</p>	<p>TAN 14 has been revoked and is now dealt with under the revised TAN 15: Development, Flooding and Coastal Erosion.</p>
<p>Landscape and visual impact advice: Updated NRW guidance on minimising landscape and visual impacts from development should be referenced, particularly where it relates to development within the visible setting of the National Park. Relevant NRW guidance on telecommunications infrastructure and electricity grid infrastructure should also be included.</p>	<p>NRW guidance documents added to PPP.</p>

Green infrastructure: Reference should be made to the Wales Green Infrastructure Forum and related NRW guidance.	Agreed. Added reference to the Forum.
Supplementary Planning Guidance (SPG): Existing SPGs are missing from Appendix A. These are important to the local policy context and should be included in the review of plans, policies and programmes.	Agreed, added.
Additional local guidance: Further relevant documents that should be reflected in Appendix A and/or Appendix B include the Trees and Woodland Siting and Design Guidance and the Starry Skies Report.	Added to Appendix A

Response from Cadw

Cadw's comments	Officer response
Need to add: <ul style="list-style-type: none"> • Historic Environment (Wales) Act 2023 • TAN24 The Historic Environment 2017 • Historic Environment and Climate Change in Wales Sector Adaptation Plan 2019 	These are included in the Scoping Report: Appendix A – Review of Relevant Plans, Policies and Programmes

Response from a private individual

Comments	Officer response
Ongoing engagement: Clarification is sought on how stakeholders will continue to be involved and able to comment as the Sustainability Appraisal progresses through assessment and monitoring stages.	Further consultation on the SA/SEA will be carried out at the preferred strategy and deposit plan stages of the LDP. Further clarification has been added to the Scoping Report, paragraph 1.5.

<p>Additional transport and infrastructure policies to include: The policy framework should be expanded to include WelTAG Stage 3 appraisals and the South West Draft Regional Transport Plan 2025–2030, which will guide regional transport investment and sustainable travel.</p>	<p>The South West Wales Regional Transport Plan is included in the Scoping Report Appendix A: Review of relevant plans, policies and programmes. The Welsh Transport Appraisal Guidance (WelTAG) has been added to appendix A.</p>
<p>Water management plans: Welsh Water’s Drainage and Wastewater Management Plan (DWMP24) and Water Resources Management Plan (WRMP24) should be included. LDP policies should support sustainable water use and align with abstraction and resilience measures.</p>	<p>Added Welsh Water’s Drainage and Wastewater Management Plan (DWMP24) and Water Resources Management Plan (WRMP24) to Appendix A.</p>
<p>Food security and self-sufficiency: Senedd Cymru’s 2026 call for a stronger, more self-reliant Welsh food sector should be reflected, including targets to increase domestic vegetable production and the infrastructure investment needed to achieve this.</p>	<p>A self-reliant Welsh food sector is outside of the remit of the LDP. The Plan will have a policy basis to consider proposals for new green infrastructure which would include allotments and community growing schemes.</p>
<p>Health and community planning: The refreshed Hywel Dda Strategy “A Healthier Mid and West Wales – Healthier lives, well lived” should be included, as its focus on community based support and prevention has direct implications for spatial and community planning.</p>	<p>Added.</p>
<p>Age Friendly Wales Strategy (2024): While the strategy is welcomed, concern is raised about an overemphasise on directing growth to new “sustainable locations”. Greater focus is needed on adapting and improving infrastructure, housing and environments within existing communities to enable ageing in place, access to services, and independent living. This aligns with the National Park’s duty to support community wellbeing.</p>	<p>Comment noted. The LDP is a development plan which provides the policy framework for assessing new development. No change necessary.</p>

<p>Placemaking and policy alignment: The LDP's interpretation of the Wales Placemaking Charter is difficult to reconcile with the Charter's people-centred principles, such as community involvement, walkability, mixed uses, accessible public spaces, and local identity. Placemaking should be more clearly linked to health, wellbeing, and age-friendly environments, consistent with PPW 12's emphasis on active and inclusive places.</p>	<p>The Wales Placemaking Charter is included in the Scoping Report, Appendix A and reference has been added to the positive health and wellbeing impacts of good placemaking.</p>
<p>Housing evidence: The Pembrokeshire Local Housing Market Assessment (2023) should be considered, with specific comments referenced under Draft Objective 9.</p>	<p>The LHMA is included in the Scoping Report, Appendix A. In the Decision Aiding Question for Sustainability Objective 10: Create inclusive opportunities for all to live in, work in and enjoy the National Park, the following has been added: Does it provide affordable housing to meet identified local need?</p>

Responses relating to Scoping Report: Appendix B Baseline Information

Response from Natural Resources Wales

NRW's comments	Officer response
<p>NRW requests correction of Appendix B (p72) wording regarding phosphate failures and advises that the most recent 2024 compliance assessment should be reported, rather than 2021 outcomes. "out of a total of 19 waterbodies 13 water bodies in total failed the targets; all ten water bodies on the Western Cleddau plus three on the Eastern Cleddau."</p>	<p>The following wording has been added under section 9.7 NRW's 2024 assessment of SAC river water quality indicates that phosphorus target failures remain a significant issue within the Afonydd Cleddau SAC, with only 28% of assessed water bodies achieving compliance. The assessment also identifies improvements within the Afon Teifi SAC compared with the previous assessment cycle. Consequently, the latest NRW compliance assessment should be used in preference to the 2021 phosphorus compliance results when describing the current baseline.</p>
<p>Water Framework Directive (WFD) Status Appendix B should be updated to reflect the Water Framework Directive Cycle 3 Interim Classification (2024), which represents the most up-to-date compliance assessment. Since 2021, the Alun, Gwaun and Narbeth Brook have improved to good status, while the Wern has improved from poor to moderate. In contrast, the Syfynwy has declined from good to moderate status.</p>	<p>Updated.</p>
<p>Freshwater SAC Water Quality Appendix B does not currently include freshwater SAC water quality compliance information, including phosphate and other relevant attributes, despite this information being referenced elsewhere in the Scoping Report, resulting in an inconsistency between documents. Condition assessments for the Afonydd Cleddau SAC are undertaken in accordance with JNCC Common Standards Monitoring guidance, which includes water quality targets to assess whether conservation objectives are being met. The latest</p>	<p>Added.</p>

<p>SAC Rivers Water Quality Compliance Assessments were published by Natural Resources Wales in 2024 alongside the WFD Cycle 3 classifications.</p>	
<p>Nutrient Neutrality Requirements Phosphorus nutrient neutrality is required in several river catchments to support the protection and restoration of river SACs. This includes parts of the Afonydd Cleddau / Cleddau Rivers SAC, specifically the western catchment and two water bodies on the Eastern Cleddau, affecting Carmarthenshire and Pembrokeshire County Councils and the Pembrokeshire Coast National Park Authority. Nutrient neutrality also applies across the entire River Teifi / Afon Teifi SAC catchment, affecting Ceredigion, Carmarthenshire, Pembrokeshire and Powys.</p>	<p>Map added to the baseline.</p>
<p>Pembrokeshire Marine SAC The Pembrokeshire Marine SAC condition assessment identifies the Milford Haven Inner Waterbody as being in unfavourable condition due to both chemical failure, specifically elevated dissolved inorganic nitrogen, and biological failure, including phytoplankton and opportunistic macroalgae. As a result, no additional nitrogen should be generated from new development either directly into the marine waterbody or indirectly via the associated freshwater catchment. A GIS layer identifies the catchments subject to nitrogen nutrient neutrality, with the Milford Haven Inner catchment being the largest, covering most of Pembrokeshire, including a substantial area of the National Park.</p>	<p>Map and text added.</p>
<p>Landscape character and seascape character assessments and guidance including your Landscape Character SPG are particularly important in defining the landscape baseline for PCNP. These should be included in the baseline. Natural Resources Wales / National Landscape Character Areas</p>	<p>Agreed. Added.</p>

(NLCA), Landscape Character Supplementary Planning Guidance – Pembrokeshire Coast National Park	
Section 13 of the Baseline relates to Tranquillity and dark skies. The locations of the 8 PCNP Dark Skies Discovery sites should be included in the baseline Starry Skies Pembrokeshire - Pembrokeshire Coast National Park .	Agreed. Added.
Pembrokeshire Coast Path Business Survey Report 2024 should be included in the baseline information at 5.4 Microsoft PowerPoint – NRW9422 Natural Resources Wales Business Survey Report Pembrokeshire Coast Path FINAL	Agreed. Added to PPP.

Response from Cadw

Cadw's comments	Officer response
Historic Environment 7.11 The statutory Historic Environment Record is curated on behalf of the Welsh Ministers by Heneb: The Trust for Welsh Archaeology.	Updated
7.22 The National Monuments Record (NMR) holds data on shipwrecks, ship losses and findspots of wreck material within its maritime dataset .	As access to this dataset is restricted, and the LDP is concerned with land-based development, reference to this information is not considered necessary.
Information on submerged prehistoric sites can be found at the NMR and more detailed information on the southern coast of Pembrokeshire has been produced in the West Coast Palaeolandscapes Survey at The Lost lands of our Ancestors - Heneb	Noted. The LDP is concerned with land based development, reference to this information is not considered necessary.

Response from a private individual

Comments	Officer response
<p>General & Population “Total population and trends”</p> <p>2021 census - 20,933, a population decline of 7.6% on the 2011 Census - 22,644 decline in residents in all age categories aged 60 to 64 and below and an increase in all age categories aged over 65.</p> <p>The Census 2021 data indicates that over a third of the population (33.1%) of the National Park is aged 65 or older, compared to a Welsh average of 21.3%. With the National Park, 1.4% are aged 90 and over. The median age of residents was 54 years, the highest of the National Parks in Wales.</p> <p>Despite this fact, there is no mention/analysis of general housing need for older people See “Housing for Older Persons” below i.e. No mention of the need for Lifetime Housing, even though the LHMA 2023 includes this.</p>	<p>Housing for older people is discussed in section 2.3 of Appendix B: baseline information.</p>
<p>Second and Holiday Homes <i>PCNPA LDP2 Tier1 and 2 settlements - Tenby 28%; Saundersfoot 28%; St Davids 18%; Crymych 0%; Newport 30% (Pembrokeshire County Council 2025)</i></p> <p>You note that “<i>This data would suggest that, in many cases, the percentage of second homes and holiday lets is significantly higher than the census average would suggest.</i>” How do you /PCC know this when you have already said that don’t have data from 2021 Census?</p> <p>You note that 2nd and holiday homes are an issue with some communities e.g Little Haven and Amroth having rates exceeding 45%. Would you not agree</p>	<p>The following sentence has been deleted from Appendix B: Baseline “<i>This data would suggest that, in many cases, the percentage of second homes and holiday lets is significantly higher than the census average would suggest.</i>”</p> <p>Information from the Census 2011 is the most recent figure as there is no comparable data in the Census 2021. Officers are preparing a separate background paper on Second Homes and Short Term Holiday lets where the impacts are assessed in more depth. The SA Baseline has identified those settlements with the highest percentages.</p>

<p>that although rates are less, the significance/impact on strategic centres is greater?</p> <p>Should you not include house prices in the Baseline Information?</p>	<p>House prices can be found on page B18.</p>
<p>Employment and Tourism Employment data does not include travel-to-work patterns or distances travelled, limiting understanding of settlement sustainability and local employment self-containment. The tourism baseline focuses on economic benefits but does not consider potential negative impacts on communities, services or the environment.</p>	<p>Separate work is being carried out with the help of Transport for Wales to understand connectivity of settlements. This will be included in future versions of the baseline, and background papers as appropriate.</p>
<p>Access to Services <i>“Most County Council Wards in the National Park are classified amongst the 10% most deprived in Wales in the Access to Services domain of the Welsh Index of Multiple Deprivation (WIMD) 2019. The exceptions were St David's, Newport and the area around Tenby and Saundersfoot. The Access to Services domain of the WIMD considers access to: a food shop; GP surgery; primary school; post office; public library; leisure centre; NHS dentist; and secondary school.”</i> NB Data from 2019?</p> <p>The domain does not assess access to hospital services. You should include information on downgrading of Withybush and the difficulty of accessing other hospital services from the National Park.</p>	<p>The WIMD 2025 data was released just after papers were finalise for NPA. WIMD 2025 data will be included for future versions.</p> <p>It is noted there are difficulties in access hospital care.</p>
<p>Transport The bus use info seems inadequate - doesn't include Poppit Rocket transition to Fflecsi and no mention of community transport – e.g. volunteer-run car schemes (<u>Country Cars</u>, <u>Cars for</u></p>	<p>Added reference to the Fflecsi service replacing Poppit Rocket and volunteer run services and train services in Pembrokeshire.</p>

<p>Carers), dial-a-ride services (Town Rider), and accessible minibus hire (Pembrokeshire Voluntary Transport, Green Dragon) for those unable to use conventional public transport</p>	
<p>Environmental and Coastal Issues Not up to date for 2025 e.g. Newport North has dropped from Excellent to Good. Noted that the SMP identifies Newport and Cwm-yr-Eglwys as Coastal Erosion Risk with <u>no active intervention</u>.</p> <p>What are the implications for Newport in LDP3?</p>	<p>Data on Bathing Water Quality for 2025 has been added. It is noted that bathing water quality for Newport dropped from Excellent to Good. National planning policy requires planning authorities to take SMPs into account in plan making.</p>
<p>Historic Environment “There is also likely to be a significant offshore historic resource (wrecks and submerged prehistoric sites) and more information on this is desirable.”</p> <p>AI says</p> <p>Information on Pembrokeshire's offshore historic resources, including shipwrecks and submerged prehistoric sites, is primarily found through the Royal Commission on Ancient and Historical Monuments in Wales (RCAHMW), which manages the National Monument Record.</p> <p>Also “Information is often available through the Pembrokeshire Coast National Park Authority”.</p>	<p>Deleted reference to more information on wrecks and submerged prehistoric sites is desirable. The LDP is a land-based development plan and this information is not considered necessary.</p>
<p>Tourism There is no measure of negative impacts.</p>	<p>There are no reliable datasets on the negative impacts of tourism.</p>
<p>Industries and Employment There is no information on <u>travel to work</u> and distances travelled e.g. What proportion of people living in main settlements work in them?</p>	<p>Information has been added to section 4. Income and Employment on Mode of Travel to Work, taken from the SWW Regional Transport Plan.</p>

Health

There is no indication as to whether of the 54.3% not in very good health, a high proportion is older.

There is no further information, but based on the demographic age profile in Pembrokeshire, it may be reasonable to assume that it is proportional.

Responses relating to the Draft Issues, Vision and Objectives Paper

Response from Natural Resources Wales (NRW)

NRW's comments	Officer response
<p>Inclusion of commitment to nature recovery, climate resilience and sustainable place making in the draft vision is noted and welcomed. We are also encouraged by recognition of the requirement to embed sustainable management of natural resources (SMNR) within Local Development Plan 3 (LDP3) and the importance of SMNR for the resilience of vital ecosystem systems.</p>	<p>Comments noted, no change required.</p>
<p>NRW appreciate the structure around four key themes consistent with the Partnership Plan and Corporate Plan. NRW would encourage reference to climate change impacts, together with objectives that enable LDP 3 to build resilience to climate change and tackle the nature emergency to be included across all issues and objectives to embed them as key considerations across the whole plan.</p>	<p>Comments noted. Climate is identified as a separate issue due to its significance, however, it is also recognised as a cross-cutting issue with references to climate under the column 'How can LDP3 have an influence on this issue?' for issues 2, 3, 6, 14, 21 and 24. Table 2, draft objectives identifies how each objective is cross cutting across the four themes.</p>
<p>1.4 Relevant Plans, Strategies and Evidence Base Some plans, policies and programmes have been identified for inclusion under SA/SEA Scoping Report.</p>	<p>Comments noted, no change required.</p>
<p>NRW agree with the scope at 1.5</p>	<p>Comment noted, no change required.</p>
<p>Key issues NRW generally agree with the inclusion and scope of strategic policies and issues in section 2 insofar as they relate to landscape. Generally support scope and potential influence of draft issues in Table 1.</p>	<p>Comments noted, no change required.</p>

<p>Issues: NRW welcome the potential identified for the LDP to effect change under Issue 1, 3 and 4: relating to landscapes, dark skies and tranquillity and the inclusion of open spaces and green and blue infrastructure in issue 5.</p>	<p>Comments noted, no change required.</p>
<p>Issue 6: should include scope to utilise and improve PROW, cycle routes and named trails. Rail and rural transport schemes e.g. including the demand responsive fflecsi bus also relates to access to landscape and are particularly valuable to people using the Pembrokeshire Coast Path. Policies in the LDP that increase opportunities and facility of these would also be welcome.</p>	<p>Comments noted. Amend bullet point 2 to include references to PROW, cycle routes, trails and read: Promote the sustainable transport hierarchy (see Planning Policy Wales) to give priority to meeting demand for travel by active travel by walking and cycling throughout towns and villages, including PROW, cycle routes and named trails; increase access to public transport (including rail, bus and rural demand-responsive services such as fflecsi) and support charging infrastructure for ultra-low-emission vehicles in appropriate locations. These measures will also support physical and mental health, reduce inequalities and contribute to net zero by decarbonising travel, while improving access to services, facilities and the countryside, coast and Pembrokeshire Coast Path.</p>
<p>Issue 7: opens potential for crossover between the Pembrokeshire landscape and Welsh language particularly in relation to poetry</p>	<p>Comment noted. Amend bullet point 3 to read: Identify locations / communities / landscapes where opportunities to promote the Welsh language, culture and local dialects can be safeguarded and enhanced.</p>
<p>Issue 9 and 10: We welcome the inclusion of landscape as a key consideration. How new housing integrates with and enables enhancement of landscape character and how impacts of proposals are assessed in landscapes evaluated as high and outstanding in LANDMAP is particularly significant. We would expect the LDP to promote landscape-led approaches to both site selection and design.</p>	<p>Comments noted. For issue 9 and 10 add a new bullet point under 'How can LDP 3 have an influence on this issue'</p> <ul style="list-style-type: none"> • Ensure new housing development is suitably located, taking account of environmental and physical constraints, including landscape and visual impact.

<p>Issue 14: Place making and sustainable design - NRW welcome the recognition that LDP3 will work in combination with other identified issues such as the nature and climate emergencies, community cohesion, health and wellbeing, accessibility, and transport. Also to address energy efficient and climate responsive design and promote nature-based solutions, such as SuDS, green infrastructure, and carbon-sequestering practices that also enhance place quality.</p> <p>NRW would expect to link with TAN 10 as well as PPW12 in relation to protection and consideration of trees for landscape and draw your attention to Building Better Places: The Planning System delivering Resilient and Brighter Futures - placemaking and the Covid-19 recovery (particularly page 22 which discusses green infrastructure) in addition to other guidance and documents on tranquillity and design for dark skies which is included elsewhere in the baseline information for the SA/SEA</p>	<p>It is agreed that the provision of green infrastructure will contribute to placemaking and this is included in column 3 under How can LDP 3 have an influence on this issue. Comment noted regarding guidance in TAN 10 and other guidance.</p>
<p>Issue 15: Employment Opportunities. Scoping should include links to TAN 6 Rural Enterprise Dwellings and One Planet Development in that it supports planning for enterprise development in rural areas that potentially support conservation and enhancement of existing landscapes which are sustainable.</p>	<p>Disagree. One Planet Developments and Rural Enterprise Dwellings are covered by National Policy.</p>
<p>Issue 18: NRW acknowledge that nutrient pollution and the impact that diffuse and point sources of nutrient pollution from both agricultural and sewage related sources has on water quality has been identified as issue. This includes reference to failing water quality targets impacting on Habitat Regulation assessments and the significant challenge this places on development planning. The inclusion of</p>	<p>Comments noted, bullet point 1 for Issue 18 has been amended to read:</p> <p>Require new development in failing SAC catchments to demonstrate no deterioration of the SAC habitat, with improvement sought for any proposals affecting SAC integrity. Development can be supported by nutrient statements or budget calculations, and, where possible, contribute to habitat</p>

<p>how LDP3 will address this challenge is also noted. Greater emphasis on the necessity for the avoidance of deterioration and the restoration of habitats to meet Habitat Regulation requirements into the future in addition to mitigation of increased nutrient load from proposed new development for nutrient neutrality is recommended for clarity.</p> <p>NRW suggest reference to the potential impact on Bathing water quality</p> <p>There is no recognition of how water quality may be adversely impacted by seasonal population increases associated with tourism, which often coincides with low river flows.</p>	<p>restoration in line with the Habitats Regulations, alongside measures to achieve nutrient neutrality.</p> <p>The comments related to Bathing water quality is noted, however this is already monitored and reported on in the Authority's AMR – No change required.</p>
<p>Issue 19: NRW suggest the inclusion of reference to directing development away from areas that would exacerbate or potentially gives rise to future coastal squeeze (loss of coastline habitats which cannot respond to sea level rise because of development on the coast).</p>	<p>Comments noted, a new bullet point for Issue 19 has been added to read:</p> <p>Direct development away from coastal areas where it would exacerbate or give rise to coastal squeeze, ensuring the protection of coastal habitats and allowing for their natural adaptation to sea level rise.</p>
<p>Issues number 20, 21 and 24: NRW recommend greater integration and cross referencing of climate change impacts, mitigation and adaptation throughout other identified issues, so that addressing the climate crisis is intrinsic within all issues and policies. Not only tabulated as has been done in Table 2 but throughout general presentation of the issues e.g. how climate change will impact each issue as applicable.</p>	<p>Comments noted. Climate is identified as a separate issue due to its significance, however, it is also recognised as a cross-cutting issue with references to climate under the column 'How can LDP3 have an influence on this issue?' for issues 2, 3, 6, 14, 21 and 24. Table 2, draft objectives identifies how each objective is cross cutting across the four themes.</p>
<p>Issue 21: NRW recommend the addition of reference to Marine Area Statement. As mentioned above themes are of relevance and include: Nature based solutions and adaptation at the coast, Making the most of Marine Planning and Building Resilience of Marine ecosystems.</p>	<p>Comments noted. Marine Area Statement will be added under the context/sources section for Issue 21</p> <p>In terms of improving water efficiency, it is agreed that the emerging Plan could place further emphasis on resource efficiency in combination with SuDS for</p>

<p>Improving water efficiency should be incorporated into how can LDP3 have an influence on this issue, to help reduce water demand.</p>	<p>new developments. A further bullet point has been added to Issue 21 to read:</p> <p>Policies to protect and improve water resources through increased efficiency and demand management of water, particularly in those areas where additional water resources may not be available. For new development this may be achieved through measures such as water saving devices, rainwater harvesting, and grey water recycling.</p>
<p>Issue 22: You may wish to include source links to Wales Agriculture Act 2023, the objectives of which introduce the Sustainable Land Management Framework for Wales. Key objectives of which are: Mitigating and adapting to climate change, Sustainable Production of Food and other Goods, Maintain and enhance the resilience of ecosystems and the benefits they provide, Conserve and enhance the countryside and cultural resources and promote public access.</p>	<p>Comments noted. Wales Agriculture Act 2023 will be added under the context/sources section for Issue 22</p>
<p>Issue 23: Minerals, Assessment of operational effects and residual visual and sensory effects on landscape character, views and special qualities of the National Park including after restoration proposals are established should be in scope</p>	<p>Potential impacts are considered at application stage, including those relating to restoration. No change required.</p>

<p>Area statement. NRW support reference to SW Area Statement and would welcome consideration of the Marine Area Statement and its themes: Building the resilience of marine ecosystems Nature-based solutions and coastal adaptation Making the most of Marine Planning</p>	<p>Comment noted. Planning jurisdiction applies up to Mean High Water Mark and does not extend into the marine environment. Nature based solutions and coastal adaptation would be considered through criteria based LDP policies. No change required.</p>
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<p>LDP 3 draft objectives are well aligned with the themes in the South West Wales Area Statement and would welcome inclusion of Marine Area Statement themes in Appendix 6.</p>	<p>See response above. No change required.</p>
<p>The latest SoNaRR 2025 evidence, published in January 2026 should be taken into account:</p> <ul style="list-style-type: none"> • Aim 1 'Stocks of natural resources are safeguarded and enhanced' and • Aim 2 'Ecosystems are resilient to expected and unforeseen change', as well as the • Bridges to the future chapter and subsequent relevant annexes. <p>The Five Bridges to the Future offer a glimpse of what might be possible in the future by thinking beyond quick fixes. Taking a systems approach across food, energy, transport and the built environment to tackle our big, interconnected challenges at the right scale. Ideally LDP3 would more clearly articulate the need for this systems approach when planning for the future, how vital the role of development planning is to effect the required change, and how the LDP3 is supporting this.</p>	<p>Reference to SoNaRR Report under Issue 2 will be updated to reflect latest 2025 evidence.</p>
<p>Draft Vision (Page 30) NRW raise concern that none of the three bullet points on this page (describing the key outcomes/goals towards the overarching vision) make reference to landscape or natural beauty. This is a concern in light of the statutory purpose derived from The 1995 Environment Act to: <i>conserve and enhance the natural beauty, wildlife, and cultural heritage of the area, while promoting opportunities for public understanding and enjoyment of its special qualities</i></p>	<p>Comment noted. The Draft Vision is required to be a positive, aspirational statement that expresses the direction of LDP3 in land use planning terms. The conservation and enhancement of the National Park's landscapes, seascapes and special qualities is clearly expressed in the statement with bullet point 2 clearly relating to public understanding of the National Park by being able to access nature, culture and heritage. No change required.</p>

NRW would support inclusion of measurable outcomes/goals that will demonstrate progress towards conservation and enhancement of landscape/natural beauty.	Measurable outcomes are beyond the scope of this paper and will be considered as part of the monitoring requirements of LDP 3 policies. No change required.
NRW welcome the recognition on page 32 that Objective 1 <i>To conserve and enhance the landscape and seascape character and special qualities of the National Park</i> links to all issues	Comment noted.

Response from Pembrokeshire County Council

Pembrokeshire County Council's comments	Officer response
Page 13, item 4, LH (Left Hand) column - not all future industrial activity will be linked to the Celtic Freeport - some major projects may come forward independently from this.	Comment noted. Amendment to issue 4 to read: Soundscapes and Tranquillity are identified as one of the National Park's special qualities and relate to the sounds associated with particular landscapes. Increasing industrial activity, including that associated with the Celtic freeport, renewable energy installations and communications infrastructure along with existing military activity and increased car ownership increasing traffic noise have the potential for adverse impacts on this special quality.
Page 14, item 6, LH column - the National Park also has some significant urban locations e.g. Tenby, Saundersfoot and St. Davids - resident populations are significantly boosted by visitors during the extended holiday / major events season.	Comment noted. Amend issue 6 to read: The National Park is a predominantly rural area with a dispersed and ageing population, many of whom are reliant on the private car. However, it also contains key service centres, including Tenby, Saundersfoot, St Davids and Newport, which provide a range of services and facilities for residents, visitors and surrounding rural communities. There is significant seasonal visitor traffic in-the-summer which places a strain on the designated landscape. There are limited and unreliable public transport options for residents and visitors (infrequent buses

	and slow rail) which presents a barrier for some in accessing the Park and local services.
Page 15, item 7, RH (Right Hand) column - bullet point 1 - housing, community infrastructure and employment proposals could in some circumstances have positive impacts on the Welsh language.	Comment noted. Amend issue 7, bullet point 1 to read: Policy framework to eliminate, reduce or mitigate against development proposals, for example, housing, community infrastructure or employment opportunities that could have negative impacts on the Welsh language, and to support proposals that have a positive impact on the Welsh language.
Page 17, item 10, LH column - should say LHMA 2023 (2025 was the WG approval and publication date).	Noted. Change made to refer to LHMA 2023. The Local Housing Market Assessment 2023 identifies a high level of unmet affordable housing need with over 5,000 households on the housing register in 2023, with a net need for 82 affordable homes per annum in the National Park. There is a predominate need for one-bedroomed social rented properties.
Page 17, item 10, RH column, bullet point 1 - in some locations, the need for mitigation to address nutrient neutrality for nitrogen might reduce the ability to deliver affordable housing through Planning Obligations secured by Section 106 Agreements.	Comment noted. The majority of settlements within the National Park drain to areas outside of the affected Milford Haven Inner waterbody and this could be an issue in a limited number of cases. No change required.
Pages 18 and 19, item 12, LH column - to note that PCC's LDP 2 is not yet adopted. The emerging plan does make provisions to meet the need identified by the Gypsy Traveller Accommodation Assessment (GTAA) 2019, but there might nonetheless be a modest role for PCNPA to play in providing private gypsy and traveller sites in National Park locations. PCC accepts that PCNPA will not allocate sites for gypsy and traveller	Comments noted, no change required.

<p>accommodation and will thus rely on a criteria-based policy approach for determining planning applications for such accommodation in its area.</p>	
<p>Page 19, item 14, RH column, bullet point 2 - this seems to commit PCNPA to ensuring all new dwellings meet Lifetime Homes Standards. However, an earlier reference in the document suggests otherwise.</p>	<p>The Authority will consider the viability implications of requiring new dwellings, or a certain number of new dwellings to be built to Lifetime Homes Standards. Amend wording to read: Set policies to ensure development achieves high standards in terms of sustainable design with all new dwellings meeting the standards set out in national planning policy including a potential policy requirement for Lifetime Homes Standards.</p>
<p>Page 20, item 14, RH column, bullet point 2 - is PCNPA advocating replacement dwellings because existing properties are over-reliant on carbon-based technologies? If so, consideration of how much carbon is used in the demolition and re-build needs to be considered.</p>	<p>The current LDP 2 does not have a policy on replacement dwellings. LDP 3 will consider a suitable policy for replacement dwellings and whether policy consideration should be given to the carbon implications of demolition and rebuilding. No change required.</p>
<p>Page 20, item 14, RH column, bullet point 5 - insulation would be a matter for consideration under Building Regulations.</p>	<p>Comment noted. Remove 'insulation' from paragraph. Paragraph to read: Encourage the sensitive retrofitting of existing buildings (e.g. renewables, heat pumps etc.)</p>
<p>Page 20, item 15, RH column, bullet point 2 - strongly supported. Presumably 'within and adjacent to'?</p>	<p>Regional Growth Areas are all within PCC's planning jurisdiction, therefore 'land adjacent to' refers to land adjacent to Regional Growth Areas that are within the National Park. No change required.</p>
<p>Page 21, item 16, LH column - the 2020/21 tourism upturn was a consequence of restrictions on foreign travel during the Covid-19 pandemic. It would be helpful to know whether this</p>	<p>Comment noted. Reference to travel restrictions during Covid-19 pandemic to be added. Paragraph to read: Tourism plays a significant role in the National Park's economic impact between 2020 and 2021 increasing by 95% and total visitors also increasing by</p>

<p>has been sustained (possibly not) in subsequent years.</p>	<p>102% in this period (partially attributable to travel restrictions associated with the Covid-19 pandemic).</p>
<p>Page 23, item 18, title - nitrates are an element of DIN (which comprises nitrates, nitrites and ammonia). Probably best not to list nitrates separately, but to add some detail to explain the different elements of DIN.</p>	<p>Agreed. Amend Title to: Water Quality (riverine, marine, phosphates and Dissolved Inorganic Nitrogen (Nitrate, Nitrite and Ammonium))</p>
<p>Page 23, item 18, RH column, bullet point 2 - this should require mitigation where the circumstances demand it. 'Promote' does not seem to be the right term to use in this context.</p>	<p>Agreed. Amend paragraph to read: Require mitigation where nutrient loads increase...</p>
<p>Page 23, item 18, RH column, bullet point 2 - improved agricultural practices are desirable, but some aspects of what is needed are outside the scope of terrestrial land use planning.</p>	<p>Comment noted, no change required.</p>
<p>Page 23, item 18, RH column, bullet point 3 - WwTW / sewerage upgrades will have a significant role to play in addressing phosphate issues. They will have a lesser role to play in addressing problems relating to DIN.</p>	<p>Comment noted.</p>
<p>Page 24, item 20, RH column, bullet point 2 - some domestic-scale micro-generation is permitted development - is the PCNPA contemplating an Article 4 Direction to require applications, linked to a LDP 3 policy intervention?</p>	<p>Agreed that some micro generation is permitted development. No Article 4 is currently being considered. Bullet point to be amended to: Consider specific policies for domestic micro generation, recognising that some will fall under permitted development rights.</p>
<p>Page 26, item 22, LH column - it might be worth PCNPA adding information about the Welsh average for BMV agricultural land (from recollection about 7%).</p>	<p>This figure is included in the SA/SEA baseline. No change required.</p>

<p>Page 26, item 22, RH column, bullet point 1 - with 45.6% BMV, this policy suggestion will significantly restrict the ability of the NPA to identify suitable sites for planned future growth.</p>	<p>Comment noted, no change required.</p>
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Response from Cwmpas

Cwmpas' comments	Officer response
<p>Cwmpas sees a clear synergy between the key issues, challenges and vision statements within the PCNPA LDP 3 Key Issues, Vision and Objectives consultation document and community led housing programmes. Community-led housing is housing development where the community plays an integral role in identifying local needs and bringing a proposal forward with a view to delivering social and economic benefits to a local area. Such projects meet long term housing needs and provide affordable housing as defined within Welsh planning policy. Furthermore, there is support for community led housing within the Welsh Government 'Programme for Government 2021 – 2026'.</p>	<p>Comment noted.</p>
<p>Cwmpas welcomes the recognition of the high level of affordable housing need in the PCNPA area as captured in the section entitled 'Communities: Foster the socio-economic well-being of National Park communities' Issue No.10 as evidenced by the LHMA 2025 and the additional drivers around second homes and holiday lets captured by Issue No.11.</p>	<p>Comment noted. The Authority has amended reference to LHMA 2025 to read LHMA 2023. The LHMA was undertaken in 2023 and approved by the Welsh Government and published in 2025.</p>
<p>Furthermore, it is similarly positive that overriding affordable housing need is a determinant to the threshold definition associated with the acceptable loss of Best and Most Versatile agricultural land (Issue No.22 'Climate and Natural Resources: Reduce and adapt to the</p>	<p>Comment noted.</p>

<p>impacts of climate change and manage natural resources sustainably’).</p>	
<p>However, it is considered that the draft Issues, Vision and Objectives paper would be enhanced by direct and explicit reference to community led affordable housing in Issue Nos.10 and 11 and onward into Objectives 8, 9 and 10. Indeed, such is the cross cutting nature of such forms of affordable housing delivery, there would be a clearer and more positive integration to the Vision statement within the consultation document.</p>	<p>For issue 10, High level of need for affordable housing, under column entitled How can LDP3 have an influence on this issue? amend bullet point 2 as follows: The level of affordable housing need will be higher than the planning system can deliver. Set a target for affordable housing delivery and identify suitable and deliverable sites for housing, including affordable housing led schemes by Registered Social Landlords (RSLs) or community-led affordable housing, including schemes delivered using social housing grant.</p> <p>For issue 9, Depopulation, ageing population and outmigration of young people, under column entitled How can LDP3 have an influence on this issue? amend bullet point 2 as follows: Identify a suitable housing and affordable housing target and identify suitable and deliverable sites for housing, including affordable housing led sites, taking account of the designated landscape of the National Park.</p> <p>The vision statement is a short, concise statement, where reference is made to the delivery of high quality housing, including affordable housing. it is not considered appropriate to broaden the vision to refer to methods of delivery of affordable housing.</p>
<p>To support these comments and observations to make such explicit reference to community led housing, reference is made to the changes made in February 2024 and introduced into PPW (Edition 12) include Paragraph 4.2.14 PPW, Paragraph 4.2.15 PPW and Paragraph 4.2.27 of PPW.</p>	<p>Comments noted. The Authority does recognise the role that community-led housing can play in delivering affordable housing. Community involvement is sought throughout the LDP process, please see the Delivery Agreement which sets out the Community Involvement Scheme, setting out how and when communities can engage in the LDP process.</p>

<p>It is now clearly the case that PPW supports community-led housing as a form of affordable housing and that, in the view of Cwmpas, this is material to the considerations of LDP 3 preparation and by implication the Key Issues, Vision and Objectives paper. For a scheme to be 'community led', the community must be integrally involved throughout the process of the development in terms of identifying the need and maintaining a strong involvement in delivering housing to meet that need even though in some cases the community does not necessarily have to initiate and manage the development process itself or build the homes themselves.</p>	
<p>Finally, it is important to recognise that community led housing is not a case of 'one size fits all' as it can come about for a number of reasons and take a number of different forms. For example, co-housing is a design methodology used by intentional communities to create spaces that promote connectivity and togetherness; housing co-operatives are housing organisations controlled, managed and owned by its members; and Community Land Trusts (CLTs) are legal entities set up by communities to provide and protect assets of community value such as genuinely affordable housing. As such, no two projects are the same. Community led housing can be adapted and moulded to create bespoke solutions that address particular issues and factors, whether socially or spatially, that have led to a group forming.</p>	<p>Comments noted. Details on the forms of community led housing has been included within the recently revised supplementary planning guidance on Affordable Housing, but this level of detail is not considered appropriate to include in the Issues, vision and objectives paper.</p>
<p>More specifically, community led housing directly addresses the issues and challenges within PCNPA area as identified in the KIVO document in terms of:</p> <ul style="list-style-type: none"> • Rebalancing demography through the creation of affordable community led 	<p>Comments noted, no changes required.</p>

<p>housing that will create opportunities to retain and attract young people and thereby foster social and economic sustainability of the communities of PCNPA area;</p> <ul style="list-style-type: none"> • Addressing inequality by increasing the amount, quality and choice of affordable housing options within the County; • Addressing the climate emergency with net zero housing developments that are inherently sustainable in terms of build standards and technology, founded upon placemaking principles, reduce dependence of private modes of transport in favour of active travel and which provide green spaces and local food production opportunities; • Addressing the nature emergency where preservation and enhancement of the biodiversity qualities of a site is a key component. 	
<p>It is considered a positive feature that the consultation document is underpinned throughout by the principles of placemaking, good quality design and the role of local community distinctiveness and character and within that the essence of the Well Being of Future Generations Act and post-pandemic recovery as if anything the pandemic has seen the role of ‘home’ and ‘place’ become more important than ever.</p>	<p>Comments noted, no change required.</p>
<p>Community led housing will be fundamental both to the qualitative nature of new affordable housing in the County and to the quantitative targets of delivering upon the new affordable homes targets for the emerging RDLP. Moreover, as well as further indirect impacts and outcomes on all seven of the WCFG Act goals, there is a direct correlation of community led housing with those goals concerned with Healthier Wales, More Equal Wales, Wales of Cohesive Communities, and Globally Responsive Wales.</p>	<p>Comments noted.</p>

<p>In making these positive comments on the explicit reference to community led housing in the KIVO, as a signatory to the to the Design Commission for Wales Placemaking Charter under its previous name as the Wales Co-operative Centre, and with reference to the Placemaking Guide 2020, Cwmpas believes that there is direct integration and correlation with the essence of community led housing and national planning policy as contained within PPW Sustainable Placemaking Outcomes in terms of social, environmental, economic and cultural well-being thus:</p> <ul style="list-style-type: none"> • Creating and Sustaining Communities – community led housing promotes health and well-being and globally responsible Wales principles in the WBFGA legislation and makes a very direct and clear link between housing development in a community and meeting the housing needs of that community whilst allowing that community genuine input into the development process. Furthermore, the functionality of community led housing for example in terms of the sense of community, shared spaces and facilities, and social interactions is demonstrative of the essence of creating cohesive communities; • Facilitating Accessible and Healthy Environments – for example, a key design principle of community led housing is to reduce dependence on private modes of transport and to encourage active modes of travel within the sustainable transport hierarchy. Furthermore, community led housing is a community facility or asset as it is the delivery of affordable housing by the community and for the community; • Maximising Environmental Protection and Limiting Environmental Impact – 	<p>The Authority notes the positive contribution that community led housing can provide.</p>
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community led housing addresses sustainability in its broadest sense of social, environmental, economic and cultural sustainability by creating viable and sustainable places through for example shared facilities and spaces such as growing areas, communal laundry or co-working hubs

- Making Best Use of Resources – community led housing will often look to develop on brownfield sites or through repurposing existing buildings or on underused land where perhaps it is not viable for a private developer or RSL to develop new affordable housing. A good case study example here is Bunker Housing in Brighton (<https://bhclt.org.uk/bunker-housing-co-op-starts-building/>) and in this context Cwmpas would welcome opportunities to engage with community groups on sites that might be considered too small, go unnoticed or present technical challenges to bring such sites forward for community led affordable housing;
- Growing Our Economy – community led housing contributes and responds positively to new patterns of work in developing places and environments for communal working or more sustainable spaces that balance work and living.

Furthermore, it is considered that the direct reference to community led housing in the KIVO document will address and remove some of the potential barriers and challenges faced in the delivery of such forms of housing in terms of the availability of sites, enhancing evidence bases of housing need through genuine community level assessment and survey to supplement wider LHMA's and, standards within community led housing schemes around design, density, energy and sustainable transport most closely reflect placemaking principles. Furthermore, a direct reference will

Comment noted. **Reference to community led affordable housing has been added under issue 10.**

<p>establish the context for subsequent planning policy development in the emerging LDP 3 around affordable housing in terms of: site specific community led housing allocations or provision of such housing as a proportion (say 5 -10%) of the dwellings on larger strategic site; rural exceptions policies; and in the repurposing or more efficient and effective re-use of community building and land.</p>	
<p>Finally, community led housing proposals can have a positive impact on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English in local communities. For example, a recent paper by Dr Simon Brooks (Chair of the Commission for Welsh-Speaking Communities clearly outlines the extent of the impact of second homes in Welsh language communities. Cwmpas believes that this issue is a symptom of the imbalance of the housing market, and the lack of control people living in places across Wales have over the future of their communities. This necessitates policy intervention, and Cwmpas would welcome the opportunity to contribute our perspectives following our experience of working with community-led housing projects, social enterprises and co-operatives in Wales. Cwmpas considers that community-led and co-operative models of housing can play a crucial role in rebalancing the housing market so power rests with communities and community cohesion, resilience and well-being is prioritised at least to the same extent as profit and economic value. Community-led models support the housing needs of a local community, ensuring that there is sufficient affordable housing available, which in-turn protects the survival of the Welsh language.</p>	<p>Comments noted.</p>

Response from Dwr Cymru Welsh Water

Dwr Cymru Welsh Water comments:	Officer Response:
<p>We note that the issues raised include specific reference to the challenges faced by PCNPA in protecting the Special Areas of Conservations (SACs) and Special Protection Areas (SPAs), including Marine, from the impact of new development (Key Issues 2 & 18), bearing in mind the 'unfavourable condition' from nutrient pollution on some of these sites. Specific reference is made in key issue 18 to ensuring that development accounts for sewer and treatment work capacity, requiring upgrades or infrastructure contributions where limits are exceeded, and we would welcome the inclusion of a policy to this effect in the LDP.</p>	<p>Comments noted</p>
<p>We acknowledge the challenge nutrient neutrality presents to the Authority, with delay in housing and infrastructure development, and are acutely aware of our role in sharing information on the current performance of our sewerage assets. Achieving water quality targets will require the combined effort of several organisations, and Dwr Cymru Welsh Water are committed to playing our part as we continue our engagement with regulators, planning authorities and other stakeholders, including the Nutrient Management Boards.</p>	<p>Comments noted. The Authority remains committed to working with Dwr Cymru to ensure housing and infrastructure development can be delivered.</p>
<p>We are pleased that the importance of Sustainable Drainage Systems (SuDS) is referenced in several key issues (2, 14, 19 & 24) and proposes policies to align with the SAB procedure.</p>	<p>Comments noted</p>
<p>The tackling of surface water at source is a vital component of sustainable</p>	<p>Comments noted. Further emphasis to surface water has been added to Issue 19 bullet point 4:</p>

<p>development and will mitigate against overloaded sewers which can ultimately lead to flooding. Disposing of surface water in a sustainable manner by ensuring that it does not communicate with the public sewerage network, including rainwater harvesting systems, protects the environment and assists in ensuring that there is sufficient capacity in the public sewerage network for foul-only flows from development sites.</p>	<p>Policies to align development identified in a flood zone to the SuDS Approval Body (SAB) procedure, supporting the implementation of sustainable drainage systems on new developments and prevent surface water discharge to the public sewerage network, to reduce pressure on sewer capacity and minimise flood risk.</p>
<p>Issue 21 identifies the importance of resource efficiency, and we would welcome the inclusion of a policy to this effect in the LDP. Incorporating water efficiency measures into new developments, and retrofitting for existing buildings, will help minimise adverse impacts on localised and wider water supply which contributes towards achieving wider sustainability aims in the face of a changing climate.</p>	<p>It is agreed that the emerging Plan could place further emphasis on resource efficiency in combination with SuDS for new developments. A further bullet point has been added to Issue 21 to read:</p> <p>Policies to protect and improve water resources through increased efficiency and demand management of water, particularly in those areas where additional water resources may not be available. For new development this may be achieved through measures such as water saving devices, rainwater harvesting, and grey water recycling.</p>

Response from a private individual

Comments	Officer response
<p>Lack of self-sufficiency in food production</p>	<p>Self-sufficiency of food production is not considered to be a key planning issue for LDP 3 to address. Policies on green infrastructure can support the provision of allotments and community growing areas in appropriate locations.</p>
<p><u>Issue 9 De-population, ageing population and outmigration of young people</u></p> <p>Have the outcomes of the growth option selected for LDP2 been analysed to</p>	<p>Officers are preparing a paper on Second Homes and Holiday Lets and have undertaken analysis of the occupation of new homes built since 2015, the base date of LDP 2. It should be noted that competition for housing</p>

<p>know the effect on the proportion of new housing taken up as 2nd homes and the effect on outmigration of young people?</p>	<p>comes from second homes and holiday lets, but also people relocating into the area.</p> <p>The Authority has commissioned Edge Analytics to undertake analysis of the 2022 based Household Projections which have been published for local authorities.</p>
<p><u>Issue 10 High level of need for affordable housing</u></p> <p>You state under “How can LDP3 have an influence on this issue?” - “Develop policies to ensure housing is appropriate in size, tenure and location to meet the identified need”</p> <p>And you say under Draft Objective 8, “To maximise the delivery of appropriate housing, including affordable housing, to meet the identified need in sustainable, well-connected places that do not compromise National Park purposes.”</p> <p>How can policies be formulated for Newport to ensure that Newport’s housing needs can be met during the Plan Period, unless the National Park is able to affect necessary improvements to Newport’s infrastructure?</p>	<p>The Authority is aware of current infrastructure capacity issues affecting development in Newport. LDP 3 covers a 15-year time period 2025 to 2040 and during the timeframe of the plan capacity may become available to support development in Newport.</p>
<p><u>Issue 11 High numbers of second homes and holiday lets</u></p> <p>You say “Whilst the National Park is a champion for high design standards with respect the landscape character and capacity there is a need to consistently uphold this standard. New development may undermine local distinctiveness and the qualities that give each settlement its unique identity, potentially”. Do you mean “New development may <u>must not</u> be allowed to undermine local distinctiveness...”?</p>	<p>This comment relates to the wording of Issue 14 Placemaking and sustainable design. The wording is to identify the issue and is considered appropriate. No change required.</p>

<p>The Draft Vision</p> <p>How are “thriving communities” enabled through the “conservation and enhancement of landscapes seascapes and unique special qualities”?</p> <p>Alternative -</p> <p>“By 2040, Pembrokeshire Coast National Park will be internationally recognised for its thriving nature, enabled through the conservation and enhancement of its landscapes, seascapes and programmes of nature recovery, for its commitment to conserving its unique qualities, and to sustainable placemaking”</p>	<p>The draft vision statement is an overarching positive and aspirational statement which is explained and exemplified by the 3 bullet points. No change required.</p>
<p>Draft Objectives</p> <p>8 “To maximise the delivery of appropriate housing, including affordable housing, to meet the identified need in sustainable, well-connected places that do not compromise National Park purposes.”</p> <p>What do you mean by “places”? Do you mean “communities”? Do you consider Newport a sustainable place?</p> <p>Does this objective protect Newport from housing development that does not meet Newport’s own identified need?</p>	<p>The term ‘places’ is used to align with Planning Policy Wales and its focus on National Sustainable Placemaking Outcomes. The Authority has undertaken a review of available services and facilities in settlements across the National Park in order to inform a sustainable settlement hierarchy. The results will be published in a background paper.</p> <p>Objective 11 reads: To promote and enhance opportunities for regenerative tourism which supports the economic well-being and sustainability of National Park communities, including balancing the demand for holiday lets, whilst seeking opportunities to actively restore the National Park’s landscape, biodiversity and cultural heritage.</p>
<p>9 “To increase opportunities for the younger population to live and work in the National Park, including consideration of the impact of second homes, and to provide opportunities for the delivery of homes suitable and accessible for an ageing population</p>	<p>The ageing population is a key issue.</p> <p>The LHMA 2023 was prepared in accordance with the Welsh Government’s toolkit and was agreed by the Welsh Government in 2025. In assessing the housing needs of older people, the LHMA considered the specific requirements for both adapted</p>

resulting in more balanced and sustainable communities.”

Quoting from the Pembrokeshire Local Housing Market Assessment,

in relation to “the delivery of homes suitable and accessible for an ageing population”, under Accessible and adaptable housing provision it is stated -

“Initially, the extent of people with disabilities will be discussed as this is the population likely to require this specialist housing” - but afterwards the LHMA does not consider the needs of the older population!

The LHMA concludes “In total 11,518 adaptable homes are required in 2036 in Pembrokeshire, of which 7,014 should be in the market sector and 4,504 in affordable accommodation”

The LHMA adds

“Whilst the future requirement for Lifetime Homes has been identified, there is limited information on the number of dwellings that fulfill this criterion in Pembrokeshire and therefore there is not a detailed profile of the current stock from which to derive a net requirement. However, the Regional Housing Market Assessment for South West and Mid Wales report estimates that there are currently around 7,000 such homes that fulfill this criterion”. (My emphases)

There is in fact no aggregated figure for the total number of existing homes that meet “Lifetime Home Standards” in South-West and Mid Wales

Pembrokeshire County Council does not have a figure for this County, let alone the National Park

housing (Lifetime Homes Standard) and extra care housing.

The section on specialist housing requirements considers the need for homes built to Lifetime Homes Standard, using data on people, including older people with a disability who are in immediate need for such homes. The results show a requirement for 11,518 dwellings built to Lifetime Homes Standard by 2036, representing 18.3% of the total housing stock in Pembrokeshire. At present, there is no evidence on what proportion of the existing housing stock meets the Lifetime Homes Standard, so it is not possible to quantify the net shortfall.

New affordable homes in Wales are required to be built to The Welsh Development Quality Requirements (WDQR) 2021 ‘Creating Beautiful Homes and Places’, which requires homes to be of a sufficient size, have a convenient layout and adequate circulation space (Appendix A). The accessibility requirements requires dwellings to meet Lifetime Homes Standards.

The Authority will consider the viability implications of requiring a proportion of new market housing to be built to Lifetime Homes standard.

The LHMA adds “*therefore there is not a detailed profile of the current stock from which to derive a net requirement*”, seeming to imply that the future requirement is an over-estimate. It is highly unlikely to be.

The updated wording (in red and with original wording deleted) now adopted for the PCNPA LDP2 Affordable Housing SPG in which it is said - “4.1 Local Housing Market Assessment - 4.1 *The latest Local Housing Market Assessment (LHMA) for Pembrokeshire provides evidence of need for affordable housing, the spatial need, numbers of bedrooms and affordable tenure required. This evidence ~~must inform future development.~~ is the primary source of evidence for identifying affordable housing need in Pembrokeshire*” and “4.54 6 *Evidence of local housing need may be submitted by local communities or site promoters. Such evidence will be given weight in decision making where it has been prepared using a robust and transparent methodology and has been subject to appropriate scrutiny. The weight to be afforded to this evidence will be determined on a case by case basis.*” – is welcome – in that it is accepting that the LHMA is not the only valid source of evidence

However, it is difficult for communities in Wales to find the resources to do this. We are not in England where communities can access up to £10,000 for “Neighbourhood Planning”. Community Place Planning in Wales does not attract such funding. The inadequacies of the Pembrokeshire LHLMA should be accepted, and - for their respective emerging LDPs - Pembrokeshire County Council and the 2 Planning Authorities should themselves determine the proportion of existing houses that does not meet

<p>Lifetime Home Standards in any community, and the proportion of new housing that is needed to be provided to do so.</p>	
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Response from Buglife

Buglife's comments	Officer response
<p>Important Invertebrate Areas and LDP Site Selection</p> <p>Buglife highlights the need for the LDP to recognise Important Invertebrate Areas (IIAs) when identifying and assessing sites for development, specifically drawing attention to the South Pembrokeshire Coast IIA.</p> <p>Importance of IIAs</p> <p>IIAs form part of a national network supporting invertebrate populations of national and international importance. These areas contain key habitats and features that are critical to sustaining invertebrate assemblages, many of which are in decline. Buglife emphasises the importance of protecting and fully considering these areas in land-use planning, habitat creation and management decisions to prevent further losses and extinctions.</p>	<p>Issue 2 refers to national and locally important sites which have a rich diversity of species and habitats. It is considered that this would include those sites that are Important Invertebrate Areas. Reference to IIAs will be included in the Context / Sources column.</p>
<p>Evidence and Mapping</p> <p>The South Pembrokeshire Coast IIA has been fine-scale mapped, and PCNPA can access the mapping files via the GIS Data Hub. Buglife recommends that the IIA is included within the National Park constraints mapping. While areas outside the mapped IIA may also be important for</p>	<p>Consideration will be given to including IIAs into constraints mapping for development management decision-making.</p>

<p>invertebrates, the IIA represents the best current evidence base.</p>	
<p>Planning and Decision-Making</p> <p>Buglife refers to its guidance document Important Invertebrate Areas in Planning, which sets out how IIAs can inform both site-specific planning decisions and strategic, landscape-scale conservation priorities. The use of IIAs is promoted as a tool to support the restoration of sustainable invertebrate populations through the planning system.</p>	<p>Comment noted. Please see above responses.</p>

Response from The Coal Authority

The Coal Authority's comments	Officer response
<p>Land Instability and Coal Mining Legacy</p> <p>Records indicate the presence of historic coal mining features within the Pembrokeshire Coast National Park, including mine entries, shallow coal workings and reported surface hazards. These features may present risks to ground stability and public safety.</p>	<p>Noted. The identified features would be considered as part of candidate Site Assessments and in individual planning applications determined under LDP3. Landowners / applicants would be alerted to the need for Coal Mining Risk Assessments to be carried out where appropriate.</p>
<p>Implications for the Local Development Plan</p> <p>While no detailed comments are made at this stage, the consultee requests that the new Local Development Plan includes an appropriate policy or policy criteria to ensure that land instability and mining-related risks are properly identified and addressed in the</p>	<p>Noted. See above answer.</p>

assessment of new development proposals.	
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Response from Tenby Civic Society

Tenby Civic Society's comments	Officer response
<p>3 Dark Skies -(a) there is a lot of light spillage from old style floodlighting of ancient and listed buildings adding to Tenby's light dome. There is a clear need for shielding/better direction to this lighting. Examples are - Castle Hill (Albert memorial and tower LED), St Marys Church (still pre LED) St Johns church.</p> <p>(b) New lights are appearing on elevations with no downlighting provision. E.G. Croft Court rear elevation lighting on upper walkways light rund 180 vertical degrees.</p>	<p>Comments appear to be related to existing development and therefore not specifically related to LDP 3. No change required.</p>
<p>5 Improve public transport. We agree that rail and bus services are inadequate and both need improving. Assembly support helps sustain the level of service, but not to improve it much. Tenby has the busiest Pembrokeshire station, but it has no toilet or manning or even a regular one hour service.</p>	<p>Comments noted. No change required.</p>
<p>7 Conserve historic heritage. The New LDP is a chance to have a policy to give 'local listing' to buildings and features of special character adding to the sense of place. There is a gap in CADW listing (two new listings in Tenby were turned down by CADW) and LDP2 for features of local importance.</p>	<p>Comment noted. Consideration will be given to including a 'local list' to the Conservation Area Supplementary Planning Guidance Documents as a starting point. LDP 3 policy relating to historic buildings of local importance. Bullet point to be added to read: Consider adding lists of buildings and features of local importance to the Conservation Area SPGs to identify, conserve and enhance locally important buildings, features and settings.</p>

<p>8 Affordable homes. High house prices mean even if prices drop with a loss of holiday lets, prices will still be too high for locals to afford. The best measures for them are Local authority or housing association new builds, or for them to buy existing stock and rent them to those on housing list.</p>	<p>Comments noted. The high level of need for affordable housing is an identified key issue. The purchase of existing housing stock is a matter for the Local Housing Authority (Pembrokeshire County Council). No changes required.</p>
<p>12 Sustain retail centres Care is needed in Tenby to restrain Tenby's evident progress from a retail centre to holiday centre. On line and out of town retail could decimate retail centre functions.</p>	<p>The Civic Society's concerns are noted. The Authority will manage out of centre and online retail pressures through a town-centre-first, sequential and impact-assessment policies that protect the vitality of the National Parks identified retail centres consistent with National Planning Policy. For Tenby, the Authority will continue to support a balanced mix of uses that maintains strong day-to-day retail and services for residents alongside tourism and leisure uses that generate year-round footfall.</p>
<p>14 Flooding Despite roads being a County Council function the Park should consider measures/policy to prevent the increasingly frequent road blockages by floods on the Ritec flood plain - making the B4318 and A4139 impassable and similarly affecting access to the Clicketts.</p>	<p>Comments noted - Pembrokeshire County Council, as the Lead Local Flood Authority, is responsible for the maintenance and delivery of flood defence infrastructure, whilst the National Park Authority acts primarily as the permitting authority. Current and future planning policy will continue to align with the guidance set out in Technical Advice Note 15 and Natural Resources Wales' Flood Map for Planning. The Authority will also continue to work closely with the Council on any potential flood management strategies specific to Tenby that may be brought forward by the Community or the Council.</p>

Response from GJ Planning

GJ Planning comments	Officer response
<p>In summary, the Draft Issues, Vision and Objectives are generally supported, and it is considered that new growth and development should be directed to St Davids given its historic track record in delivering housing. St Davids can play a fundamental role in helping to address the identified issues over the Plan period, whilst fulfilling the objectives set out in the Paper.</p>	<p>Comments noted. The Authority is undertaking a review of the settlement hierarchy and considering spatial growth options for LDP 3.</p>

Response from a Community Campaigner

The following response was received which is a generic response sent out and is not specific to the Draft Issues, Vision and Objectives Paper or the Sustainability Appraisal / Strategic Environmental Assessment Scoping Report. The comments have been noted and no changes are required.

Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950.

Support is expressed for increasing the long-term retention and reuse of carbon-rich historic buildings, recognising their role in tackling the climate crisis, delivering economic benefits and enhancing conservation, while potentially attracting wider funding opportunities.

Retrofit and ventilation are identified as priorities, with support for adapting older buildings through sensitive reconstruction, higher ceilings and modern energy systems, while maintaining harmonious and distinctive conservation area streetscapes.

Embodied energy and embodied carbon should remain central considerations, influencing new development to adopt traditional, low-carbon principles and prioritising the retention of existing buildings over demolition.

A comprehensive building by building carbon study is suggested, potentially involving national and international academic institutions, to strengthen the evidence base for retaining historic buildings locally and nationally.

The use of sustainable materials should be supported through an approved contractor and materials directory, or alternatively through clear council led guidance on traditional construction and specialist restoration techniques to reduce costs and discourage demolition-led proposals.

Biodiversity enhancement should be maximised, particularly through dense tree planting and hedgerows along arterial roads and commuter routes, supported where possible by financial incentives for private landowners.

Flood risk management should include clear identification of existing and emerging hotspot areas and access to emergency grant funding, enabling coordinated action by local authorities to prevent repeated damage and costly repairs.

Appendix B: Meeting note: Online Presentation on Sustainability Appraisal incorporating Strategic Environmental Assessment Scoping Report and Draft Issues, Vision and Objectives Paper

9 February 2026, 7pm

Attendees:

3 individuals attended.

PCNPA: Phil Barlow (Research and Sustainability Appraisal Officer), Gayle Lister (Principal Planning Officer), Steffan Davies (Planning Officer), Kate Attrill (Development Management Manager), Emma Gladstone (Strategic Policy Manager)

Structure and outline of the presentation:

- Outline of LDP process – what is an LDP, why is it important, key stages and timetable for preparing LDP 3
- Overview of the Sustainability Appraisal and Strategic Environmental Assessment process, why it's required, overview of the scoping stage and Scoping Report and appendices (review of plans, programmes and policies and Baseline data)
- Overview of key issues identified under the following themes: Conservation, Connection and Cultural Heritage, Communities (social and economic), Climate Change and Natural Resources
- Draft vision, its purpose and links between issues and objectives and policy framework for LDP 3
- Draft objectives – link to vision and key issues
- Overview of documents, how to comment and key deadlines
- Opportunity for questions

Questions received:

How does the plan ensure it will achieve sustainable placemaking?

Summary of Officer response: Officers are undertaking a settlement assessment to identify which settlements in the National Park have access to key services and facilities. This will be circulated to Town and Community Councils for quality check. The results will inform a settlement hierarchy.

Officers will assess different spatial growth options: alignment with the settlement hierarchy, conformity with Future Wales, sustainable communities option and

dispersed growth. These will be assessed against the sustainability assessment framework.

Should the Call for Candidate Sites be undertaken at a later stage following the consideration of spatial options and the identification of a preferred strategy?

Summary of Officer response: The call for candidate sites is one of the first stages in the LDP process and is done early in the process. The existing LDP 2 settlement boundaries and settlement hierarchy should inform where is considered sustainable. Sites which are well related to existing settlement boundaries would be welcomed, but sites in an isolated countryside location would be unsustainable. The methodology paper outlines how candidate sites will be assessed.

How can Newport sustainably develop and would it be required to be viewed in a sustainable community with Dinas Cross?

Summary of Officer response: Officers are aware of current infrastructure capacity issues in Newport, relating to the pumping station. Dwr Cymru Welsh Water are undertaking ongoing investigations in Newport. At this point in time, officers are aware there may be potential constraints to development, however the situation may change during the lifetime of LDP 3 which runs to the end of March 2040. The current Asset Management Programme for Newport runs until 2030 and there will be future AMP programmes during the timeframe of LDP 3. There is a level of uncertainty regarding infrastructure capacity beyond 2030.

How are sites identified for future AMP programmes?

Summary of Officer response: Officers are not aware of the exact process, but would continue to liaise with DCWW throughout plan preparation. In the current AMP, schemes are identified to address phosphate issues. Future AMP programmes should address capacity issues, but this is a matter for DCWW.

One attendee commented that the number of attendees was disappointing and asked how was the event advertised.

Summary of Officer response: An email or letter regarding the consultation on the SA Scoping Report and Draft Issues Paper was circulated to all those on the LDP 3 Contact List which totals over 1,300 individuals. This includes key stakeholders, NPA Members, Councillors in the National Park, Town and Community Councillors and any members of the public who have requested to be on the list.

For the Call for Candidate sites we circulated an email or letter to those on the database, held an online presentation on 4 February, circulated posters and leaflets to all Town and Community Councils and placed an advert in the Western Telegraph.

In person drop-in sessions will be held across the National Park for the statutory Preferred Strategy and Deposit consultations.

Copy of PowerPoint Presentation



Parc Cenedlaethol Arfordir Penfro
Pembrokeshire Coast National Park

Local Development Plan 3

Issues, Vision and Objectives Report

Sustainability Appraisal and Strategic
Environmental Assessment Scoping Report

Online Engagement Event
09/02/2026

Cynllun Datblygu Lleol 3

Papur Materion, Gweledigaeth ac Amcanion

Arfarniad Cynaliadwyedd ac Adroddiad
Cwmpasu ac atodiadau Aseiad
Amgylcheddol Strategol

Digwyddiad Ymgysylltu
09/02/2026

Structure of workshop / Trosolwg o'r Gweithdy

- Local Development Plan 3 Process
- Sustainability Appraisal incorporating Strategic Environmental Assessment
- Draft Issues
- Vision
- Objectives
- Questions

- Cynllun Datblygu Lleol 3 Proses
- Arfarniad o Gynaliadwyedd yn ymgorffori Aseiad Amgylcheddol Strategol
- Materion Drafft
- Gweledigaeth
- Amcanion
- Cwestiynau



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Arfordir Penfro
Pembrokeshire Coast
National Park

Local
Development
Plan 3 Process
/ Cynllun
Datblygu Lleol
3 Proses

Stage	Cam
Definitive Stages:	Camau diffiniol:
Review Report March 2025	Adroddiad yr Adolygiad Mawrth 2025
Delivery Agreement April to October 2025	Cytundeb Cyflawni Ebrill i Hydref 2025
Pre-Deposit participation November 2025 to October 2026 Call for candidate sites: January 2026 to March/ April 2026 Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) Scoping Report January 2026 to February 2026	Cyfranogiad Cyn-adneuo Tachwedd 2025 i Hydref 2026 Galwad am safleoedd ymgeisiol: Ionawr 2026 – Mawrth/Ebrill 2026 Aseiad Cynaliadwyedd (SA) sy'n cynnwys Adroddiad Cwmpasu Aseiad Amgylcheddol Strategol (SEA) Ionawr 2026 i Chwefror 2026
Preferred Strategy November 2026 to June 2027 Consultation period: January to March 2027	Strategaeth a Ffefrir Tachwedd 2026 i Fehefin 2027 Cyfnod ymgynghori: Ionawr i Fawrth 2027
Deposit July 2027 to September 2028 Consultation period: March to May 2028	Adneuo Mehafin 2027 i Fedi 2028 Cyfnod ymgynghori: Mawrth i Fai 2028
Indicative Stages	Camau dangosol
Submission to Welsh Government October 2028	Cyflwyno i Lywodraeth Cymru Hydref 2028
Examination October 2028 to September 2029. Hearing Sessions anticipated February/ March 2029	Archwillad Hydref 2028 i Fedi 2029. Rhagwelir Sesiynau Gwrandawriad Chwefror / Mawrth 2029
Adoption November 2029	Mabwysiadu Tachwedd 2029

Sustainability Appraisal incorporating Strategic Environmental Assessment / Arfarniad o Gynaliadwyedd yn ymgorffori Asesiad Amgylcheddol Strategol

What is it?

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

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.

Beth yw e?

Mae Arfarniad Cynaliadwyedd yn ofyniad statudol ar gyfer Cynlluniau Datblygu Lleol o dan Adran 62(6) o Ddeddf Cynllunio a Phrynu Gorfodol 2004. Pwrpas Arfarniad Cynaliadwyedd yw asesu effeithiau llesiant cymdeithasol, economaidd, amgylcheddol

Reoliadau Asesiadau Amgylcheddol o Gynlluniau a Rhaglenni (Cymru) 2004. Mae Asesiad Amgylcheddol Strategol yn gofyn am asesiad ffurfiol o gynlluniau a rhaglenni penodol sy'n debygol o gael effeithiau sylweddol ar yr amgylchedd; mae hyn yn cynnwys Cynlluniau Datblygu Lleol



Sustainability Appraisal incorporating Strategic Environmental Assessment / Arfarniad o Gynaliadwyedd yn ymgorffori Asesiad Amgylcheddol Strategol

Where are we now – Scoping Stage

The scoping stage sets the “scope” for the appraisal by checking that we have the right focus before the detailed assessment begins.

At this stage we ask:

- Have we identified the right sustainability issues?
- Does the Sustainability Appraisal / Strategic Environmental Assessment Framework adequately cover the issues identified?
- Are the appropriate documents identified in the Review of Relevant Plans, Policies and Programmes?
- Does the Baseline Information include the main sources of data?

Ble ydym ni nawr – Cyfnod Craffu

Mae'r cyfnod craffu'n gosod y gwaith “craffu” ar gyfer y gwerthusiad drwy wirio ein bod yn canolbwyntio yn y ffordd gywir cyn i'r asesiad manwl gychwyn

Ar y cyfnod hwn gofynnwn:

- Ydych chi'n cytuno â'r materion a nodwyd yn yr Adroddiad Cwmpasu?
- A yw'r Arfarniad Cynaliadwyedd / Fframwaith Asesu Amgylcheddol Strategol yn trafod y materion a nodwyd yn ddigonol?
- A yw'r dogfennau priodol wedi'u nodi yn yr Adolygiad o Gynlluniau, Polisiau a Rhaglenni Perthnasol ?
- A yw'r Wybodaeth Sylfaenol (Atodiad B) yn cynnwys y prif ffynonellau data?



Sustainability Appraisal incorporating Strategic Environmental Assessment / Arfarniad o Gynaliadwyedd yn ymgorffori Asesiad Amgylcheddol Strategol

What is in the scoping report?

- A list of the key sustainability issues identified from the review of plans and programmes and baseline data
- Sustainability Objectives
- A review of relevant plans, policies and programmes (Appendix A)
- Baseline information

Beth yw'r Adroddiad Cwmpasu?

- Rhestr o'r materion allweddol ar gynaliadwyedd a adnabuwyd o'r adolygiad o'r cynlluniau a'r rhaglenni a'r data sylfaenol
- Amcanion Cynaliadwyedd
- Adolygiad o Gynlluniau, Polisiâu a Rhaglenni Perthnasol (Atodiad A)
- Llinell Sylfaenol



Draft Key Issues / Materion Allweddol Drafft

- Identify the key issues, challenges and drivers facing the National Park.
- Economic, environmental, social and cultural aspects.
- Requirements of national, regional and local strategies.
- Evaluation of key issues for the adopted plan – still relevant and to what degree?
- New issues?

- Nodi'r materion, yr heriau a'r sbardunau allweddol y mae'r Parc Cenedlaethol yn eu hwynebu.
- Agweddau economaidd, amgylcheddol, cymdeithasol a diwylliannol.
- Gofynion strategaethau cenedlaethol, rhanbarthol a lleol.
- Gwerhusiad o faterion allweddol ar gyfer y cynllun mabwysedig – dal I fod yn berthnasol ac I ba rhaddau?
- Materion newydd?



Draft Key Issues / Materion Allweddol Drafft

Issues based on a robust and detailed evidence base and appropriate plans, policies and programmes including:

- **Future Wales – The National Plan 2040**
- **Planning Policy Wales (Edition 12)**
- **Pembrokeshire Well-being Plan**
- **South West Wales Area Statements (NRW)**
- **PCNP Partnership Plan 2025-2029**

Mae'r materion yn seiliedig ar sylfaen dystiolaeth gadarn a manwl a cynlluniau, y polisiau a'r rhaglenni priodol yn cynnwys:

- **Cymru'r Dyfodol – Y Cynllun Cenedlaethol 2040**
- **Polisi Cynllunio Cymru (Argraffiad 12)**
- **Cynllun Llesiant Sir Benfro**
- **Datganiadau Ardal De-orllewin Cymru (CNC)**
- **Cynllun Partneriaeth PCAP 2025-2029**







Draft Key Issues / Materion Allweddol Drafft

Grouped under the National Park Corporate Priorities (The 4 Cs):

- **Conservation** 
- **Connection and Cultural Heritage** 
- **Communities** 
- **Climate and Natural Resources** 

Wedi'u grwpio o dan bedair Blaenoriaeth Gorfforaethol y Parc Cenedlaethol:

- **Cadwraeth** 
- **Cysylltiad a Threftadaeth Ddiwylliannol** 
- **Cymunedau** 
- **Hinsawdd ac Adnoddau Naturiol** 



Conservation /

Cadwraeth



1. Conservation of Landscape and Seascape and National Park Special Qualities
2. Conservation and enhancement of biodiversity and habitat connectivity
3. Conservation and enhancement of dark skies
4. Conservation and enhancement of soundscapes and tranquillity

1. Gwarchod Tirweddau a Morluniau a Rinweddau Arbennig y Parc Cenedlaethol
2. Gwarchod a gwella bioamrywiaeth a chysylltedd cynefinoedd
3. Gwarchod a gwella awyr dywyll
4. Gwarchod a gwella seinweddau a llonyddwch



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Connection (Well -being) /

Cysylltiad (Llesiant)



5. Promotion of physical and mental health and well-being
6. Provision of sustainable transport and access to services

5. Hyrwyddo iechyd a lles corfforol a meddyliol
6. Darparu trafndiaeth gynaliadwy a mynediad at wasanaethau



Parc Cenedlaethol
Arfordir Penfro
Pembrokeshire Coast
National Park



7. Protection and promotion of Welsh Language, local dialects and culture
8. Conservation and enhancement of landscapes of historic interest, Conservation Areas, historic buildings and their settings

7. Gwarchod a hyrwyddo'r Gymraeg, tafodieithoedd lleol a diwylliant
8. Gwarchod a gwella tirweddau o ddiddordeb hanesyddol, Ardaloedd Cadwraeth, adeiladau hanesyddol a'u lleoliadau



9. De-population, ageing population and outmigration of young people
10. High level of need for affordable housing
11. High numbers of second homes and holiday lets
12. Meeting the need of the Gypsy, Travellers and Showpeople population
13. Poverty and inequality (especially childhood poverty)
14. Placemaking and sustainable design

9. Diboblogi, poblogaeth sy'n heneiddio a phobl ifanc yn allfudo
10. Lefel uchel o angen am dai fforddiadwy
11. Niferoedd uchel o ail gartrefi a llety gwyliau
12. Diwallu anghenion y boblogaeth Sipsiwn, Teithwyr a Phobl Sioe
13. Tlodi ac anghydraddoldeb (yn enwedig tlodi plentyndod)
14. Creu lleoedd a dylunio cynaliadwy





15. Employment opportunities – fair work, seasonal, low paid etc.
16. Balancing the competing demands of tourism against the protection of the National Park's special qualities and its communities
17. Retail and changing town centres

15. Cyfleoedd cyflogaeth – gwaith teg, tymhorol, cyflog isel ac ati
16. Cydbwysu gofynion cystadleuol twristiaeth ag amddiffyn rhinweddau arbennig y Parc Cenedlaethol a'i gymunedau
17. Manwerthu a newidiadau i ganol trefi



18. Water Quality (riverine, marine, phosphates, nitrates, DIN)
19. Flooding and Coastal Change
20. Renewable and low carbon energy
21. Climate change and adaptation
22. Best and Most Versatile Agricultural Land
23. Minerals
24. Reduce carbon emissions / transition to net zero energy.

18. Ansawdd Dŵr (afonol, morol, ffosffadau, nitradau, NAT)
19. Llifogydd a Newid Arfordirol
20. Ynni adnewyddadwy a charbon isel
21. Newid hinsawdd ac addasu i'r hinsawdd
22. Tir Amaethyddol Gorau a Mwyaf Amlbwrpas
23. Mwynau
24. Lleihau allyriadau carbon / pontio i ynni sero net



Draft Vision / Gweledigaeth Drafft

- Overarching.
- How the National Park is planned to develop, change or be protected.
- Consistent with other Plans.
- Concise, focused, positive and aspirational.
- Clear understanding of the economic, environmental, social and cultural issues.
- Provides the drive for the policy framework and proposals for LDP3.

- Gweledigaeth gyffredinol
- Sut y bwriedir datblygu, newid neu warchod y Parc Cenedlaethol.
- Cysondeb â Chynlluniau eraill.
- Cryno, cadarnhaol gyda ffocws ac uchelgeisiol.
- Dealltwriaeth glir o'r materion lles economaidd, cymdeithasol, amgylcheddol a diwylliannol.
- Darparu'r fframwaith ar gyfer strategaeth y Cynllun a pholisïau.



Draft Vision / Gweledigaeth Drafft

By 2040, the Pembrokeshire Coast National Park will be internationally recognised for its thriving nature and communities, enabled through the conservation and enhancement of its landscapes, seascapes and unique special qualities. This will be exemplified by our commitment to nature recovery, climate resilience and sustainable placemaking, which are the foundational principles of all development.

- The National Park will be achieving measurable benefits for biodiversity and will be leading efforts to obtain net-zero carbon status by 2050.
- Residents and visitors will be able to access nature, culture and heritage through active travel and sustainable transport, using and celebrating the Welsh language, and will have improved physical and mental health and well-being.
- The National Park will be enabling age balanced coastal and rural communities through the provision of diverse, sustainable and resilient economic opportunities, high quality housing, including affordable housing and facilities that meet local needs.

Erbyn 2040, bydd Parc Cenedlaethol Arfordir Penfro yn cael ei gydnabod yn rhyngwladol am ei natur a'i gymunedau ffyniannus, a alluogir trwy warchod a gwella ei dirweddau, ei forluniau a'i rinweddau arbennig unigryw. Arddangosir hyn gan ein hymrwymiad i adferiad natur, gwydnwch hinsawdd a chreu lleoedd cynaliadwy, sef egwyddorion sylfaenol pob datblygiad.

- Bydd y Parc Cenedlaethol yn cyflawni manteision mesuradwy ar gyfer bioamrywiaeth a bydd yn arwain ymdrechion i gyflawni statws carbon sero net erbyn 2050.
- Gall trigolion ac ymwelwyr gael mynediad at natur, diwylliant a threftadaeth drwy deithio llesol a thrafnidiaeth gynaliadwy, gan ddefnyddio a dathlu'r Gymraeg, a byddant yn mwynhau iechyd a lles corfforol a meddyliol gwell.
- Bydd y Parc Cenedlaethol yn galluogi cymunedau arfordirol a gwledig sy'n gytbwys o ran oedran trwy ddarparu cyfleoedd economaidd amrywiol, cynaliadwy a gwydn a thai o ansawdd uchel, gan gynnwys tai forddiadwy a chyfleusterau sy'n diwallu anghenion lleol.

Draft Objectives / Amcanion Drafft

- 16 draft objectives.
- In conformity with Future Wales: The National Plan 2040, take account of national planning policy and the National Park Partnership Plan.
- Identify key outcomes relating to land use planning matters.
- Demonstrate delivery of the National Sustainable Placemaking Outcomes and align with the well-being goals of the Well-being of Future Generations (Wales) Act 2015.
- Set within the context of needing to achieve the National Park purposes.

- 16 o amcanion drafft.
- Yn cydymffurfio â Cymru'r Dyfodol: Y Cynllun Cenedlaethol 2040, yn ystried polisi cynllunio cenedlaethol a Chynllun Partneriaeth Parc Cenedlaethol.
- Nodi beth ddylai'r canlyniadau allweddol fod, mewn perthynas â materion cynllunio defnydd tir.
- Dangos bod y Canlyniadau Cenedlaethol Creu Lleoedd Cynaliadwy yn cael eu cyflawni, ac alinio â nodau llesiant Deddf Llesiant Cenedlaethau'r Dyfodol (Cymru) 2015.
- Wedi'u gosod yng nghyd-destun yr angen i gyflawni dibenion y Parc Cenedlaethol.



Questions? /

Email:
devplans@pembrokeshirecoast.org.uk

Phone: 01646 624800.

Cwestiynau?

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Appendix C: Note of Pembrokeshire Coast National Park Partnership Forum

Date: 19 March 2026

Time: 10.30am

Location: Online

Attendance

Representatives attended from the following organisations:

Pembrokeshire Coast National Park Authority, including Members and Officers

- National Farmers' Union Cymru
- Pembrokeshire County Council
- Pembrokeshire Nature Partnership
- Pembrokeshire College
- Mid and West Wales Fire and Rescue Service
- The Royal Society for the Protection of Birds
- The Cleddau Project
- The National Trust Cymru
- Friends of Pembrokeshire Coast National Park
- Defence Infrastructure Organisation
- Natural Resources Wales
- Heneb
- Pembrokeshire Association of Voluntary Services

Presentation and Discussion: Local Development Plan 3 (LDP3)

Officers gave a presentation and workshop lasting approximately one hour to the Partnership Forum.

LDP3 Vision 2040 Exercise

A presentation on the key issues, vision and objectives for Local Development Plan 3 (LDP 3) was presented by the Strategic Policy team. The PowerPoint presentation is provided in Annex A.

The presentation outlined the proposed timetable for the preparation of LDP 3, which will set development policy for the National Park area up to 2040. The scope and context of the Plan were described, alongside an overview of the planned engagement stages. The importance of the Partnership Forum's role in plan-making and collaborative delivery was emphasised.

Members were signposted to the National Park Authority's open consultations on LDP 3 and were encouraged to submit comments if they had not already done so. It was noted that the consultation deadline had been extended to 31 March 2026.

The session included a series of rapid online polls delivered via Microsoft Forms to gather initial views on key LDP3 issues. Feedback was discussed following each poll. The full results are provided in Annex B.

Discussion during this session covered a wide range of topics. In relation to dark skies, reference was made to the Environment (Principles, Governance and Biodiversity Targets) (Wales) Bill and the associated target framework. It was noted that, while planning has an important role to play in managing lighting impacts, other non-planning measures, such as adjustments to existing lighting, timing or retrofitting, could also help reduce adverse effects.

Members noted a slight decrease in the number of Welsh speakers in the National Park between the 2011 and 2021 censuses. The importance of the National Park as a resource for health and wellbeing, as well as access to services and facilities, was also highlighted.

Flooding and wildfires were identified as ongoing challenges, with reference to an observed increase in wildfire incidents across Pembrokeshire and the coast. Mitigation measures discussed included vegetation management, grazing, firebreaks and management of the urban-rural interface. It was noted that MAWWFIRE was in discussion with the National Park Authority's Farm Conservation Officer regarding proactive land management, and that alignment between subsidy schemes and policy would be critical in reducing wildfire risk.

Clarification was provided on the distinction between LDP 3 Issue 11 (Renewable and Low Carbon Energy) and Issue 15 (Reducing Carbon Emissions and Transitioning to Net Zero). It was explained that Issue 11 focuses primarily on land use and energy generation, while Issue 15 relates to reducing emissions from buildings and transport.

The need for an Equality Impact Assessment of LDP 3 was noted, and members were encouraged to consider the plan-making process through the lens of the Welsh Government's Just Transition framework.

Affordable housing was discussed, including clarification that this includes social housing provision, but also wider affordability challenges affecting people who are not eligible for social housing. Population change was also noted, with an estimated decrease of approximately 7% in the National Park population between 2011 and 2021, likely linked to the out-migration of younger people.

The Chair emphasised that, while planning could not address all of the challenges discussed, the LDP3 process would seek to identify measures within its scope to help reduce poverty, including child poverty. The role of LDP3 as an enabling mechanism was underlined, including discussion on the potential to encourage development on brownfield sites through a sequential planning approach.

Members were reminded that the call for candidate sites for LDP 3 remains open until 27 April 2026.

Discussion of the emerging vision for LDP3 was limited due to time constraints, and members were encouraged to submit further comments via the National Park Authority website or through the meeting chat.

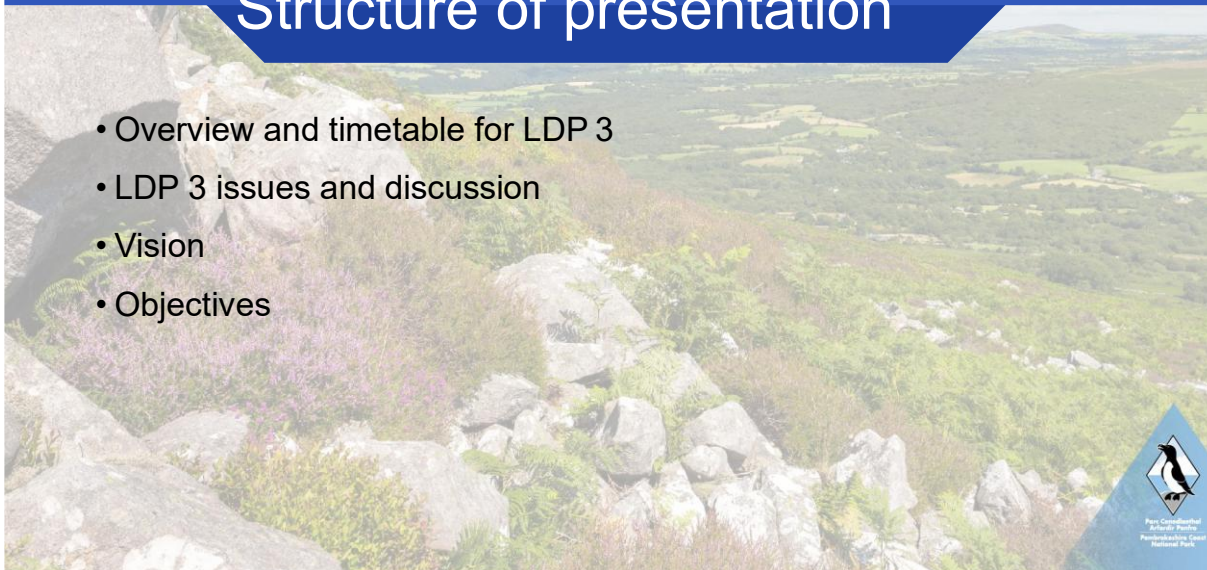
Local Development Plan 3 Draft Issues, Vision and Objectives Report

Presentation for Partnership Forum
19th March 2026



Structure of presentation

- Overview and timetable for LDP 3
- LDP 3 issues and discussion
- Vision
- Objectives



Structure of presentation

- Overview and timetable for LDP 3
- LDP 3 issues and discussion
- Vision
- Objectives



Overview

- The Local Development Plan is a statutory plan
- LDP 2: Adopted September 2020
- Review of LDP 2 concluded a full revision should be undertaken (see Review Report, March 2025)
 - Conformity with Future Wales strategy
 - Respond to climate and nature emergencies
 - Address significant changes in PPW, particularly relating to Green Infrastructure and second homes
 - Ensure continuity beyond plan end date to provide affordable housing and growth opportunities



LDP3 Timetable

Definitive stages:		
Stage	Timescale	Consultation period
Review Report	March 2025	10 January to 21 February 2025
Delivery Agreement	April to October 2025	19 May to 14 July 2025
Pre-Deposit participation	November 2025 to October 2026	Call for candidate sites: January 2026 to March/ April 2026 Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) Scoping Report January 2026 to February 2026
Preferred Strategy	November 2026 to June 2027	January to March 2027
Deposit	July 2027 to September 2028	March to May 2028
Indicative stages:		
Submission to Welsh Government	October 2028	Not applicable
Examination	October 2028 to September 2029. Hearing Sessions anticipated February/ March 2029	
Adoption	November 2029	Not applicable



Draft Key Issues

- Identify the key issues, challenges and drivers facing the National Park.
- Economic, environmental, social and cultural aspects.
- Requirements of national, regional and local strategies.
- Evaluation of key issues for the adopted plan – still relevant and to what degree?
- New issues?



Draft Key Issues



Draft Key Issues cont

Grouped under the Corporate and Partnership Plan priorities (The 4 Cs):

Conservation:

Conserve and enhance landscapes, seascapes, natural beauty and wildlife

Connection and Cultural Heritage:

Conserve and enhance cultural heritage, Welsh language and enhance equitable access to the National Park

Climate and Natural Resources:

Reduce and adapt to the impacts of climate change and manage natural resources sustainably

Communities:

Foster the socio-economic well-being of National Park Communities



**Engagement
exercise 1:
Identification of key
issues**

Conservation:

Conserve and enhance landscapes, seascapes, natural beauty and wildlife

Connection and Cultural Heritage:

Conserve and enhance cultural heritage, Welsh language and enhance equitable access to the National Park

Climate and Natural Resources:

Reduce and adapt to the impacts of climate change and manage natural resources sustainably



Conservation



1. Landscape and Seascape pressures (National Park Special Qualities)
2. Threats to biodiversity and habitat connectivity
3. Conservation and enhancement of dark skies
4. Conservation and enhancement of soundscapes and tranquillity



Connection and Culture



5. Promotion of physical and mental health and well-being
6. Provision of sustainable transport and access to services
7. Protection and promotion of Welsh language and culture
8. Conservation and enhancement of landscapes of historic interest, Conservation Areas, historic buildings and their settings



Parks, Gardens and
Landscapes
Heritage
National Park

Climate

9. Water Quality (riverine, marine, phosphates, nitrates, DIN)
10. Flooding and Coastal Change
11. Renewable and low carbon energy
12. Climate change and adaptation
13. Best and Most Versatile Agricultural Land
14. Minerals
15. Reduce carbon emissions / transition to net zero energy.



Parks, Gardens and
Landscapes
Heritage
National Park

Engagement
exercise 2:
Identification of key
issues

Communities:

Foster the socio-economic well-being of National Park
Communities



Partnership between
the National Park
Communities and
the National Park

Communities (Social)



16. De-population, ageing population and outmigration of young people
17. High level of need for affordable housing
18. High numbers of second homes and holiday lets
19. Meeting the need of the Gypsy, Travellers and Showpeople population
20. Poverty and inequality (especially childhood poverty)
21. Placemaking and sustainable design



Partnership between
the National Park
Communities and
the National Park

Communities (Economic)



22. Employment opportunities – fair work, seasonal, low paid etc.
23. Balancing the competing demands of tourism against the protection of the National Park's special qualities and its communities
24. Retail and changing town centres



Engagement exercise 3:

Summary of key issues



The Vision by 2040

- Overarching.
- How the National Park is planned to develop, change or be protected.
- Consistent with other Plans.
- Concise, focused, positive and aspirational.
- Clear understanding of the economic, environmental, social and cultural issues.
- Provides the drive for the policy framework and proposals for LDP3.



Consistency with other Plans

Pembrokeshire Well-being Plan 2023-2028:

"to unlock the power and potential of Pembrokeshire's people and communities so that they are happy, healthy and live well, our communities are kind, safe, resourceful and vibrant, our economy is green and thriving and our environment is protected and enhanced."

PCNPA Corporate Plan 2023/24-26/27:

"A National Park where nature, culture and communities thrive."

PCNPA Partnership Plan 2025-2029:

"To ensure a vibrant, sustainable future for the environment and for those who live, work and visit the National Park."



Penn Cymru
Cymru
Pembrokeshire
National Park



Engagement exercise 4:
Vision



Our Vision

Nature-Recovery
 Affordable-Housing Access
 Climate-Resilience
 Balanced Facilities Culture
Landscapes
 Community
 Placemaking Well-Being
 Economy
 Special_Qualities
 Welsh-Language Biodiversity
Seascapes Health
 Sustainability Net-Zero Tourism











The Vision by 2040

By 2040, the Pembrokeshire Coast National Park will be internationally recognised for its thriving nature and communities, enabled through the conservation and enhancement of its landscapes, seascapes and unique special qualities. This will be exemplified by our commitment to nature recovery, climate resilience and sustainable placemaking, which are the foundational principles of all development.










- The National Park will be achieving measurable benefits for biodiversity and will be leading efforts to obtain net-zero carbon status by 2050.
- Residents and visitors will be able to access nature, culture and heritage through active travel and sustainable transport, using and celebrating the Welsh language, and will have improved physical and mental health and well-being.
- The National Park will be enabling age balanced coastal and rural communities through the provision of diverse, sustainable and resilient economic opportunities, high quality housing, including affordable housing and facilities that meet local needs.











Objectives

 CONSERVATION: Conserve and enhance landscapes, seascapes, natural beauty and wildlife			
LDP 3 Objective Number	Objective	Link to identified issues	Link to 4Cs
1	To conserve and enhance the landscape and seascape character and special qualities of the National Park.	All	  
2	To conserve, enhance and manage the National Park's outstanding natural environment, rich species and habitat diversity and their connectivity to ensure their resilience to climate change whilst providing wider social, economic and health and well-being benefits.	1, 2, 3, 4, 5, 8, 14, 18, 19, 21, 23, 24	  
3	To conserve, enhance and promote the National Park's special qualities of dark skies, soundscapes and tranquillity, maximising socio-economic benefits, contributing to well-being and adapting to climate change.	1, 2, 4, 5, 6, 8, 14, 20, 21, 24	  









Objectives

 CONNECTION AND CULTURAL HERITAGE: Conserve and enhance cultural heritage, Welsh language and enhance equitable access to the National Park			
LDP 3 Objective Number	Objective	Link to identified issues	Link to 4Cs
4	To create inclusive, accessible and sustainable places that enable people to access services, facilities, open space, nature, community and cultural facilities and high-quality housing to reduce inequality.	5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 24	 
5	To promote sustainable access that seeks to reduce car dependency and the need to travel, providing opportunities for improved active travel and public transport options for residents and visitors.	1, 4, 5, 6, 9, 13, 14, 15, 16, 21, 24	 
6	To identify opportunities to promote the use of the Welsh language and to safeguard and enhance local cultures, Pembrokeshire dialects and Welsh language-sensitive areas	1, 3, 4, 7, 8, 10, 11, 14, 15, 16	 
7	To conserve, enhance and promote the historic, cultural, heritage and built environment of the National Park, maximising the wider benefits to health and well-being and the economy.	1, 3, 4, 5, 7, 8, 14, 16	 

Objectives

 COMMUNITIES: Foster the socio-economic well-being of National Park communities			
LDP 3 Objective Number	Objective	Link to identified issues	Link to 4Cs
8	To maximise the delivery of appropriate housing, including affordable housing, to meet the identified need in sustainable, well-connected places that do not compromise National Park purposes.	1, 2, 3, 4, 5, 6, 7, 9, 10, 11, 12, 13, 14, 24	
9	To increase opportunities for the younger population to live and work in the National Park, including consideration of the impact of second homes, and to provide opportunities for the delivery of homes suitable and accessible for an ageing population resulting in more balanced and sustainable communities.	1, 2, 5, 7, 9, 10, 11, 13, 14, 15, 24	
10	To ensure the design of all development in the National Park reflects its special landscape and townscape qualities and local distinctiveness, meets the highest standards for resource use including minimising waste, and takes account of the impact of a changing climate	1, 2, 3, 4, 5, 8, 10, 11, 14, 16, 18, 21, 24	 
11	To promote and enhance opportunities for regenerative tourism which supports the economic well-being and sustainability of National Park communities, including balancing the demand for holiday lets, whilst seeking opportunities to actively restore the National Park's landscape, biodiversity and cultural heritage.	1, 2, 3, 4, 5, 7, 8, 11, 14, 16, 18, 21, 24	 
12	To sustain and enhance the National Park retail centres as vibrant, viable and diverse shopping centres	1, 4, 6, 14, 15, 17	

Objectives

 CLIMATE AND NATURAL RESOURCES: Reduce and adapt to the impacts of climate change and manage natural resources sustainably.			
LDP 3 Objective Number	Objective	Link to identified issues	Link to 4Cs
13	To safeguard and enhance the natural resources, air, water and soil quality (including BMV land) in the National Park and to minimise the creation of new sources of pollution and contamination, recognising there are limited opportunities for brownfield development.	1, 2, 3, 4, 10, 15, 16, 18, 20, 21, 22, 24	 
14	To ensure new, highly vulnerable development does not take place in locations that are at risk of flooding or that may increase the risk of flooding in another location, and to ensure that development is sustainably designed to provide drainage and flood management where appropriate.	1, 2, 5, 10, 14, 15, 16, 18, 19, 21	 
15	To promote opportunities for energy conservation and efficiency, the use of renewable and low carbon energy to reduce carbon emissions, meet national targets and decarbonising travel to adapt to climate change and support the transition to net zero.	1, 3, 4, 5, 6, 10, 14, 18, 20, 21, 24	 
16	To ensure the safeguarding of the National Park's mineral resource whilst ensuring no new mineral workings or extensions to existing mineral workings other than in exceptional circumstances.	1, 2, 4, 5, 14, 21, 23, 24	

What Happens Next?

- Submit views on the Draft Issues, Vision and Objectives Paper by 23 March [LDP 3 Consultations - Pembrokeshire Coast National Park](#)
- Submit Candidate Sites by 27 April [Call for Candidate Sites LDP 3 - Pembrokeshire Coast National Park](#)
- Further engagement on strategy options – growth levels and spatial options in summer
- Preferred Strategy consultation: January 2027

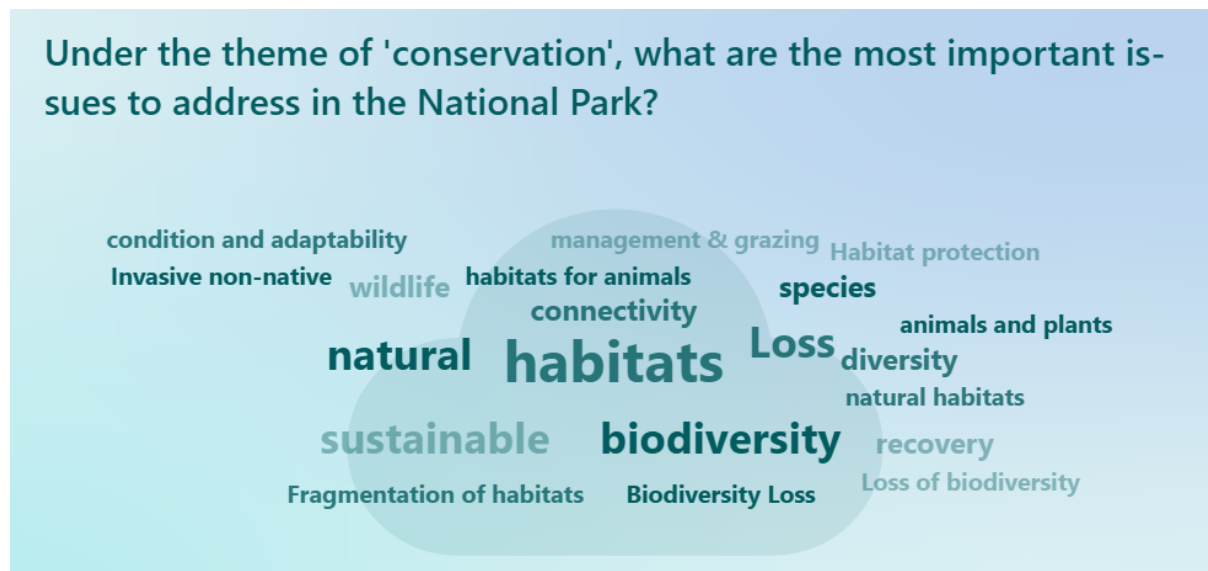


Summary of Questionnaire Feedback from Partnership Forum

As part of the Partnership Forum meeting held in March 2026, attendees were invited to participate in a short questionnaire designed to support early engagement in the preparation of Local Development Plan 3 (LDP3) for the Pembrokeshire Coast National Park. The purpose of the questionnaire was to gather partner perspectives on the key issues and pressures affecting the National Park under the shared themes of conservation, connection and cultural heritage, climate and natural resources, and communities. Participants were also asked to reflect on the longer-term challenges facing the National Park and the role that organisations may be able to play in helping to address these issues. The responses received provide valuable insight into stakeholder priorities and concerns and form an important part of the evidence base to inform the emerging LDP3.

Question 1: Conservation – Key Issues in the National Park

Under the theme of 'conservation', what are the most important issues to address in the National Park?



Respondent number	Response
1	Loss of biodiversity - we need to link hot spots
2	wildlife corridors, natural and diverse habitats

3	Ensuring that the natural landscapes that make the Park what it is are maintained and protected, enabling all life (plant, animal and human) to be sustainable and protected
4	Ecosystem resilience, particularly with reference to the DECCA framework (diversity, extent, connectivity, condition and adaptability. Fragmentation of habitats and generally poor condition are key challenges.
5	Working with WG to implement the new Seabird Conservation Strategy (where possible)
6	Over tourism
7	nature recovery and enhancing biodiversity
8	diverse species
9	Water quality. Biodiversity Loss.
10	Habitat protection and recovery, Disturbance to wildlife, Declining biodiversity and species loss, Sustainable land management & grazing, Invasive non-native species, Climate change impacts, Maintaining ecological connectivity, Recreation and visitor pressure
11	Marine / river eutrophication
12	Sustainable management of protected sites
13	To ensure and enhance natural habitats for animals and plants, but also ensuring traditional activities and practices within Pembrokeshire are maintained for future generations

Responses to the conservation question showed a strong consensus that biodiversity loss and ecosystem degradation represent the most pressing challenges facing the National Park. Participants frequently highlighted the fragmentation of habitats and the need to strengthen ecological connectivity, including through wildlife corridors and the linking of biodiversity “hotspots”. Nature recovery and the protection and enhancement of diverse habitats, across terrestrial, freshwater and marine environments, were repeatedly emphasised.

Water quality was raised as a significant concern, particularly in relation to nutrient enrichment and wider land-use impacts, alongside the management of invasive non-native species and disturbance to wildlife. Respondents also identified the pressures arising from high visitor numbers and recreational use, particularly in sensitive locations, and the need to balance these pressures with conservation objectives. While the protection of natural landscapes was central, several responses also recognised the importance of sustaining traditional land management practices and cultural activities that have historically shaped the Park’s landscapes.

Question 2: Connection and Cultural Heritage – Key Issues

Under the theme of 'connection and cultural heritage,' what are the most important issues to address in the National Park?



ID	Response
1	Reduction in Welsh language
2	transport, accessibility (ability for people to be in the landscape),
3	Ensuring that communities are able to celebrate their culture and heritage, be that linking back to the past or embracing new and evolving communities who share the Park as home
4	Coastal car parking, access to the coast for our visitors
5	Loss of unlisted historic buildings
6	affordable housing
7	Access to Health and Well-being Opportunities
8	Protecting historic and archaeological sites from coastal erosion, safeguarding iconic cultural landmarks and heritage assets, preserving and promoting Welsh language and cultural identity, recording and interpreting newly exposed or hidden heritage, maintaining the cultural landscape shaped by centuries of human activity, and balancing tourism with the protection of cultural sites and local communities.
9	Historic buildings
10	This should include the protection and enhancement of the rich, finite and non renewable heritage resource of the Park. This should include both statutorily protected and non protected assets, standing remains and the buried resource. Also Parks, Gardens and Historic Landscapes.
11	As in 'conservation', the maintaining of activities and practices unique to Pembrokeshire are maintained and enhanced. Also, the ability to connect in a tailored manner to suit the appropriate audience, making message delivery more effective.

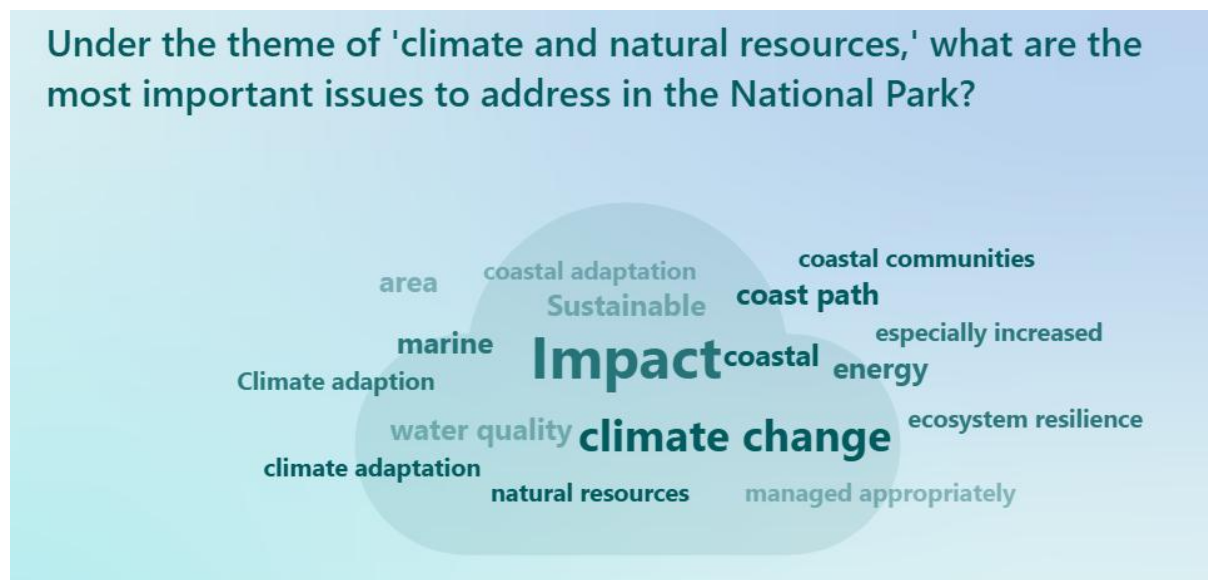
Feedback under this theme focused on strengthening people's connection to place while safeguarding cultural and heritage assets. A number of

respondents expressed concern about the decline in the use of the Welsh language within the National Park and the need to actively protect and promote Welsh cultural identity, local traditions and community heritage. The safeguarding of historic and archaeological assets was also raised as a priority, including both designated and non-designated heritage, historic buildings and cultural landscapes.

Coastal erosion and climate change were identified as growing threats to heritage assets, with a need to protect, record and interpret heritage that may be at risk or newly exposed. Access emerged as a recurring issue, including transport, parking, accessibility to the coast and the wider landscape, and ensuring that both residents and visitors are able to engage with the Park in meaningful and appropriate ways. Access to health and wellbeing opportunities was also seen as integral to strengthening connections between communities and the National Park. Affordable housing was raised within this theme as an issue closely linked to community cohesion, cultural continuity and people’s ability to remain within the Park.

Question 3: Climate and Natural Resources – Key Issues

Under the theme of 'climate and natural resources,' what are the most important issues to address in the National Park?



ID	Responses
1	Impact of climate change on the coast path
2	coastal adaptation

3	Climate adaption planning, alongside enabling stronger reusable energy development plans, but managed appropriately.
4	Sustainable use embedded in economy - not maximising profits but optimising them. Agriculture and fisheries in particular. Tourism too.
5	Encouraging alternative energy in a sustainable way that doesn't impact on key marine species
6	Parking and travel
7	adaptation to climate change
8	water quality
9	Impact on Coast Path.
10	Addressing climate change and sea-level rise, managing natural resources sustainably, protecting vulnerable coastal and marine environments, supporting climate adaptation in coastal communities, improving water quality and land-use impacts, and enhancing ecosystem resilience in the face of increasing environmental pressures
11	Mitigation - especially increased run-off from fields.
12	increase land area of protected sites
13	A multi-agency approach to mitigating and responding to climate related events, increase in Wildfires in Pembs over last 5 years , the same with Flooding incidents, all impacting upon the animals, flora and fauna, as well as the people living, working and visiting the area. Directly linking back to 'conservation', 'connection and cultural heritage'.

Responses demonstrated a strong focus on the impacts of climate change, particularly in coastal locations. Coastal adaptation, sea-level rise and the implications for key infrastructure such as the Coast Path were highlighted as priority concerns. Participants emphasised the importance of embedding climate adaptation planning alongside mitigation measures, recognising the increasing frequency and severity of climate-related events.

The sustainable management of natural resources was repeatedly referenced, with calls for long-term resilience across agriculture, fisheries and tourism, rather than approaches driven by short-term economic gain. Renewable and low-carbon energy development was broadly supported, provided it is appropriately sited and managed to avoid harm to landscape character and biodiversity, particularly in marine environments. Water quality, agricultural runoff and wider land-use impacts were again identified as key issues. Several responses pointed to the need for a coordinated, multi-agency approach to addressing flooding, wildfires and other climate-related risks affecting both communities and ecosystems.

Question 4: Communities – Social and Economic Challenges

What are the biggest challenges facing communities (both socially and economically) in the National Park?



ID	Responses
1	Isolation, cost of living
2	Affordable housing
3	Broad based sustainable economy
4	Economic pressures
5	Sustainable year round employment, especially for young people. High house prices relative to wages. Need to keep our young people here by providing opportunities to thrive.
6	Cost of living / child poverty levels
7	aging population, diversity of age
8	Loss of biodiversity, lack of affordable and available housing, pressure on local services and infrastructure from high visitor numbers, economic vulnerability due to reliance on seasonal industries, the high cost of maintaining community assets, increasing climate-related risks to coastal settlements, pressures on land use, water quality and natural resources, and the need for greater community capacity and skills to support sustainable development
9	unemployment and lack of employment opportunities for young people, growing elderly population
10	Health decline, unemployment, boredom amongst young people
11	seasonality
12	Affordable Housing. Sustaining Third Spaces - community facilities, facilities for young people - skate parks etc. Employment opportunities and transport to employment opportunities.
13	quality and size of social housing eg airey houses

Feedback on community challenges highlighted a range of interrelated social and economic pressures. Affordable housing emerged as one of the most

frequently raised issues, linked closely to high house prices, limited availability of suitable housing and concerns about retaining younger people and families within local communities. Respondents consistently identified the shortage of sustainable, year-round employment opportunities as a major concern, particularly for young people, contributing to population ageing and outward migration.

Cost of living pressures, including child poverty, social isolation and health decline, were also raised, alongside the challenges of maintaining community facilities and “third spaces” that support social wellbeing. Seasonal economies, unemployment outside peak visitor periods and limited transport options were seen as further constraints on community resilience. Several responses noted the pressure placed on local services and infrastructure by high visitor numbers, particularly in popular coastal settlements.

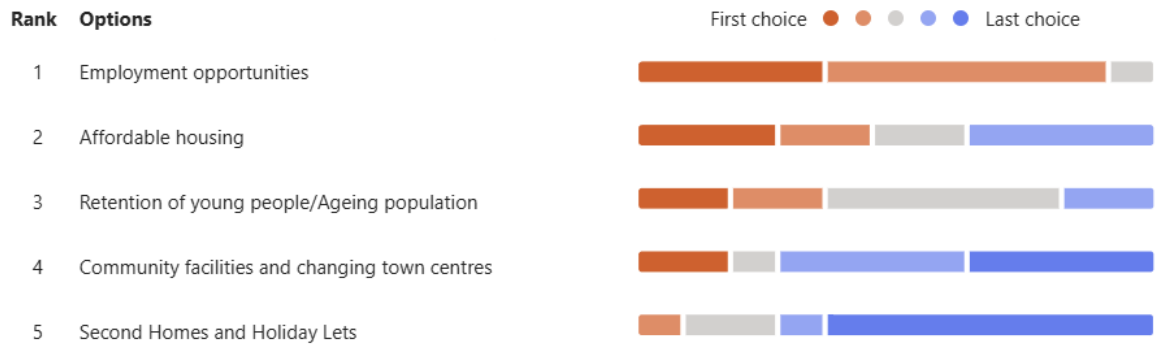
Question 5: Priority issues in the Park

Rank the following issues in priority order:



2. Rank the following issues in priority order:

11 Responses



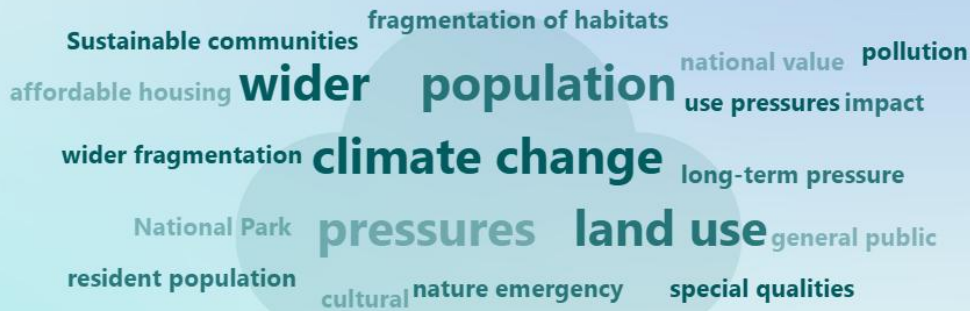
Employment opportunities emerged as the highest priority issue, with the majority of respondents ranking it as their first or second choice. Affordable housing was the second-highest priority, receiving a mix of high and lower rankings but generally viewed as an important concern. The retention of young people / ageing population ranked third overall, with respondents showing moderate concern. Community facilities and changing town centres was a lower priority for most respondents, often ranked fourth or fifth. Second homes and holiday lets was the lowest-priority issue, with most respondents placing it near the bottom of their rankings.

Question 6: Greatest Long-Term Pressures Facing the National Park

Reflecting on the issues discussed today, what's the greatest long-term pressure facing the National Park?

9 responses submitted

Reflecting on the issues discussed today, what's the greatest long-term pressure facing the National Park?



ID	Responses
1	Managing land use pressures, including pressures arising outside the Park but which affect it eg pollution, climate change and wider fragmentation of habitats.
2	Balancing the needs of the resident population with those of the four Cs
3	Population change - aging population
4	Communicating our national value and connecting with the general public
5	inequality
6	Sustainable communities, affordable housing
7	Squeeze on all land use diminishing the quality of special qualities
8	The greatest long-term pressure is the accelerating combined impact of climate change and the nature emergency, which underpins and drives many of the wider social, cultural and economic challenges facing the National Park.
9	Climate

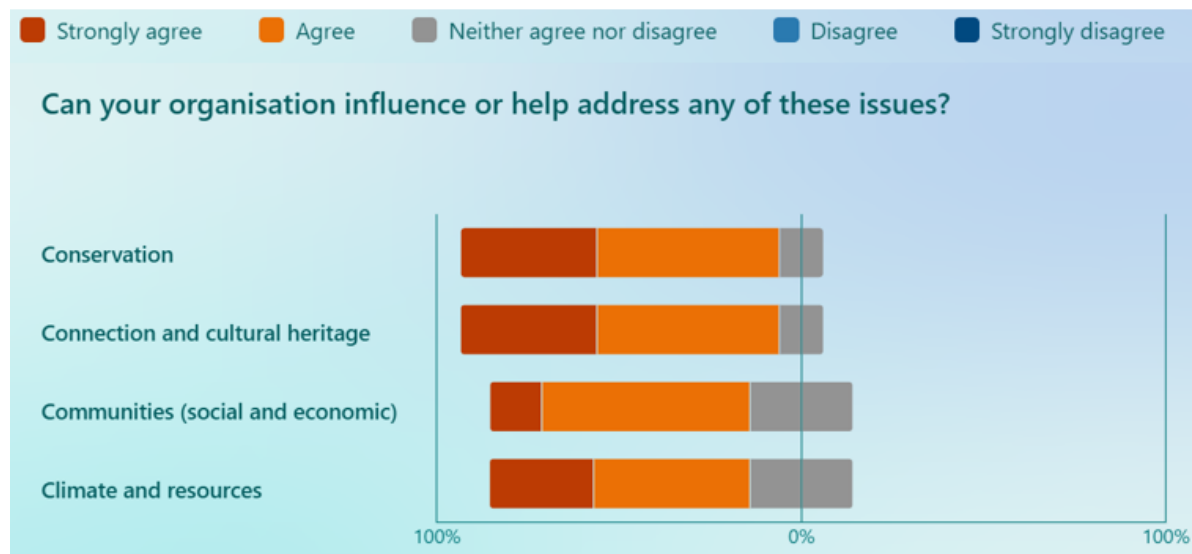
When reflecting on the long-term pressures facing the National Park, respondents identified the combined and accelerating impacts of climate change and the nature emergency as the most significant overarching challenges. These were viewed as fundamental drivers that intensify other environmental, social and economic pressures, including habitat fragmentation, land-use competition and community vulnerability.

Balancing the needs of both resident communities and the wider objectives of conservation, climate action and public enjoyment was highlighted as an ongoing challenge. Demographic change, including population decline and an ageing population, was identified as a further long-term concern, alongside inequality and the ongoing challenge of sustaining affordable housing. Respondents also pointed to the growing squeeze on land use and the

potential erosion of the National Park’s special qualities, as well as the importance of improving communication and public understanding of the National Park’s value and role.

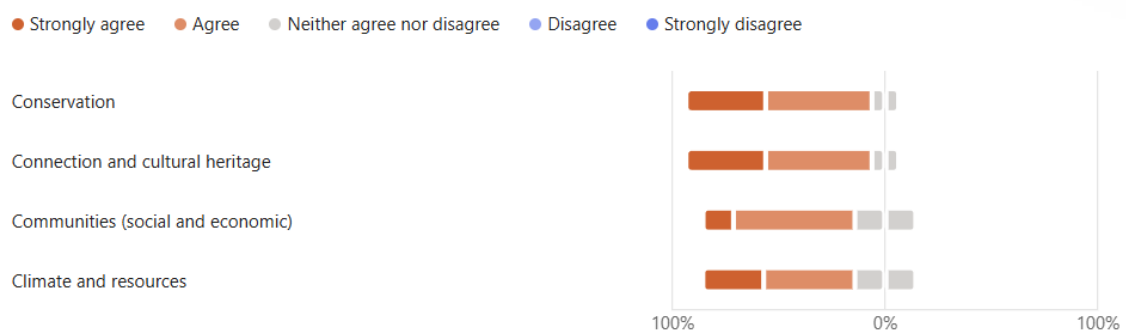
Question 7: Capacity to Help Address Identified Issues

Can your organisation help address any of these issues?



2. Can your organisation influence or help address any of these issues?

[More det](#)



Responses to the final question indicate that a number of organisations represented at the Partnership Forum consider that they are able to contribute to addressing the issues and pressures identified through the questionnaire. While the nature and extent of potential contributions varied, this feedback demonstrates a clear willingness among partners to support the objectives of Local Development Plan 3 through partnership working, shared expertise and collaborative approaches. The responses reinforce the role of the Partnership

Forum as a key mechanism for engaging organisations in both the development and delivery of LDP3, and highlight the opportunity to build on existing strengths and networks to help respond to environmental, social and community challenges within the National Park.

Conclusion

Overall, the questionnaire responses reinforce the importance of taking an integrated and collaborative approach to the preparation of Local Development Plan 3. The feedback highlights a clear recognition among partners that issues relating to conservation, climate change, cultural heritage and community wellbeing are closely interrelated, and that long-term pressures such as climate change, biodiversity loss and housing affordability cut across all themes. While respondents acknowledged that planning alone cannot resolve all of the challenges identified, there was a strong expectation that LDP 3 should provide a strategic and enabling framework to support partnership working, guide appropriate development, and help balance the needs of communities with the protection of the National Park's special qualities. The views expressed through the questionnaire will therefore help inform the ongoing development of LDP 3, including the identification of key priorities, policy direction and opportunities for collaboration in plan delivery.

Pembrokeshire Coast National Park Authority

**LOCAL DEVELOPMENT PLAN 3
(2025 - 2040)**

Sustainability Appraisal (incorporating
Strategic Environmental Assessment)

Scoping Report

Consultation Draft: January 2026
Post consultation update: June 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.

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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 economic, social, environmental and cultural well-being context and objectives, establishing the baseline to identify and focus on the significant issues in the National Park. A review of relevant plans, policies and programmes and strategies is undertaken to indicate their implications for LDP 3. This helps to shape and decideing on the scope of the sustainability objectives that will form the SA/SEA framework to assess the effects of the plan's policies and proposals;
- Assess Local Development Plan strategic options, spatial strategy and policies against the Sustainability Objectives as established in the scoping report. This will be set out in the initial Sustainability Appraisal Report which will also explain how any harmful effects of the LDP can be avoided or offset, and how the beneficial effects can be maximised. A Sustainability Statement stating how the findings of the Sustainability Appraisal has been taken into account in the final Plan The report will be available for consultation alongside the LDP Preferred Strategy consultation and updated for consultation alongside the Deposit Plan, 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~~
- ~~The final Sustainability Appraisal Report will bring together the initial sustainability appraisal report and be updated for the Deposit Plan. It will be further updated to take account of the recommendations made by the Planning Inspector. It will be published following receipt of the Inspector's Report.~~
- A post adoption statement will be published following adoption of LDP 3 explaining how sustainability considerations and the assessments, has been taken into account in the production of LDP 3.

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.

~~1.7~~1.8 [The draft Scoping Report was subject to public consultation for an eight-week period from the 26th January to 23rd March 2026, alongside the draft issues, vision and objectives paper. A report of consultation summarising the responses received, together with an officer response was reported to NPA on the 24th June 2026. ^{*hyperlink*}](#)

~~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, [landscape character](#), 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 [impact on water resources, river flows, public water supply resilience, storm overflow operation, wildfire risk and health impacts on vulnerable groups, 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 and parking, 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 hotspots³ 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.

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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.

³

<https://pcnpa.maps.arcgis.com/apps/instant/portfolio/index.html?appid=a1b357317cad41689f725aa68b5c9d03> ("Communities")

[The Pembrokeshire Coast National Park Landscape Character⁴, and Seascape Character⁵ Assessments build on the work of Natural Resources Wales \(LANDMAP\) to further define the character sensitivity of the landscape and seascape amenity of the National Park.](#)

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Issue 4: Dependence on private cars

Pembrokeshire is a [predominantly](#) 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. [However, opportunities for active travel and public transport can have environmental, economic, social and health and wellbeing benefits.](#)

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.

[Water Framework Directive Cycle 3 \(Interim 2024\) identifies three rivers that pass through the National Park as having issues:](#)

⁴ <https://www.pembrokeshirecoast.wales/planning/planning-policy/local-development-plan-2/supplementary-planning-guidance/landscape-supplementary-planning-guidance-interim/>

⁵ <https://www.pembrokeshirecoast.wales/planning/planning-policy/local-development-plan-2/supplementary-planning-guidance/seascape-character-supplementary-planning-guidance/>

- The Cleddau Rivers (East and West) are classified as “At Risk” for both salmon and sea trout, the worst classification category, due to consistent downward trends in fish numbers; and
- The River Nevern is classified as probably at risk. River quality is generally moderate, though a number of the National Park

's rivers

Natural Resources Wales identifies key pressures on ecological status, including diffuse and point source pollution, physical modifications to river channels and banks, floodplain disconnection, barriers to fish passage, habitat disruption and alien species.

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.

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.

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 Pembrokeshire⁶.

~~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).~~

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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.

⁶ 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 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.

[The most significant issue for Pembrokeshire's marine environment at present is nutrient neutrality. Features of the Pembrokeshire Marine SAC are in "unfavourable" condition due to Dissolved Inorganic Nitrogen \(DIN\). Development that occurs within the freshwater catchments that drain to the SAC is required to demonstrate nitrogen neutrality. In addition the Cleddau Rivers SAC is subject to restrictions and targets for phosphates. Agriculture is likely to be the largest contributor to these nutrient issues but other lands uses, such as housing developments could also contribute to this. Further data on source apportionment is required to fully understand the problem.](#)

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.

[Within the National Park there are particular issues in some locations regarding ~~with the capacity for~~ wastewater disposal due to environmental impacts or infrastructure capacity. in Newport, Broad Haven, Solva and in Tenby. In Tenby conditions are now being placed upon housing developments to prevent occupancy before 2029 to allow time for upgrades to be made.](#)

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.⁷

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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:

- 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

⁷ IUCN (1994) Guidelines for Protected Area Management Categories. Cambridge: IUCN

Issue 18: Second and holiday homes

At the 2011 Census the National Park had one of the highest rates (27.6%⁸) 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 Amroth⁹.

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.

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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.

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

⁸ Based on Census 2011 "Households with no usual resident"

⁹ Pembrokeshire County Council 2025

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.

Issue 254: Retaining young people and supporting and ageing population

Between the 2011 and 2021 Censuses the usual resident population of the National Park declined substantially (7.6%). The 2021 Census also showed that the National Park ~~an increase in its~~ has an ageing population with over a third of people being 65 or over, and a decline in those aged under 65. ~~the majority of the remaining population being 30+.~~ The ageing population is presenting challenge for communities.

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 <u>and tranquillity</u> ? 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?

both within and outside designated sites.		Would there be an impact on 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.	2,4,17,20,21 4,21	Does it promote accessible recreation resources? E.g. foot path links, public transport links or accessibility for those with reduced mobility Does it promote active volunteering opportunities?
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	Does it provide opportunities to increase the use of the Welsh Language and Pembrokeshire Dialects, and promote cultural events? Does it aim to conserve and enhance the historic environment? Does it aim to protect the communities of the National Park from inappropriate development? Does it aim to conserve and enhance community facilities?
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	2,4,17,21,20	Does it promote access to green infrastructure, including green spaces for leisure and recreation?

<p>who live, work and visit the National Park, promoting healthy and sustainable places.</p>		<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>
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Communities

<p>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</p>	<p>1,2,5,7,9,11,12,14,16, 25</p>	<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? (this may cater for the career aspirations of younger people)</p> <p>Would it enhance the vitality and viability of retail centres in line with changing needs?</p>
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		Does it support and enable appropriate rural enterprise?
Sustainability Objective 8: Maximise opportunities for development to sustain local communities.	3,15,16,18, 25	<p>Does it promote the provision of housing, including affordable housing?</p> <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> <p>Does it support the needs of an ageing population?</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, 25	<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, 25	<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> <p><u>Does it provide affordable housing to meet identified local need?</u></p>
Climate and Natural Resources		
<p>Sustainability Objective 11: Mitigate and reduce factors contributing to climate change by reducing greenhouse gas emissions, particularly from transport and energy use to contribute to the target of net zero.</p>	1,2,4, 7, 10	<p>Does it promote the use of renewable energy?</p> <p>Does it promote the efficient use of resources e.g. in development of the built environment?</p> <p>Does it the need to travel or promote walking, cycling and public transport or reduce the need to travel by private car?</p>
<p>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.</p>	5, 7, 11,12,13,14, 17	<p>Does it assist communities in becoming more resilient to the effects of climate change?</p> <p>Is it likely to increase the resilience of habitats?</p> <p>Would it avoid development in areas at risk of flooding or coastal erosion?</p>
<p>Sustainability Objective 13: Improve air quality by promoting low impact development that minimises the need to travel (especially by private car)</p>	2,4,10	<p>Does it promote patterns of development that reduce the need to travel?</p> <p>Does it aim to promote sustainable transport?</p> <p>Does it promote renewable energy?</p>

		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 most versatile agricultural land.	5,7	Does it protect the best and most versatile (BMV) agricultural land? Does it help to reduce loss of soils to non-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 goals¹⁰ 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.

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¹⁰ 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	✓	-	✓

to sustain local communities)																	
9 (Ensure community facilities meet population needs)	x	x	✓	x	✓	✓	-	✓									
10 (Create inclusive opportunities for all)	-	-	✓	-	-	-	-	-	-	-							
11 (Mitigate and reduce factors contributing to climate change)	X	✓	0	0	0	✓	✓	✓	✓	0							
12 (Adapt to the impacts of climate change and build resilience)	✓	✓	0	✓	-	✓	✓	✓	0	0	✓						
13 (Improve air quality by promoting low impact development)	0	✓	0	0	0	✓	✓	✓	✓	0	✓	✓					
14 (Conserve and enhance the quality of river and coastal waters)	✓	✓	-	-	-	-	✓	X	0	-	✓	✓	✓				
15 (Conserve and enhance soil quality)	✓	✓	-	-	-	-	✓	X	X	-	✓	✓	✓	✓			
16 (Reduce adverse effects of minerals exploitation)	✓	✓	-	-	-	✓	-	0	-	-	✓	✓	0	✓	✓		
17 (Reduce the negative impacts of waste and support the circular economy)	✓	✓	-	-	-	-	✓	✓	0	-	✓	✓	✓	✓	✓	✓	✓
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17

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

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**

Pembrokeshire Coast National Park Authority

LOCAL DEVELOPMENT PLAN 3

(1 April 2025 –31 March 2040)

Draft Issues, Visions and Objectives paper

Consultation Draft: January 2026

Post consultation draft: June 2026



Parc Cenedlaethol
Arfordir Penfro
Pembrokeshire Coast
National Park

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1. Introduction

1.1 Overview

1.1.1 The Pembrokeshire Coast National Park Authority has commenced work on the Local Development Plan 3 (LDP3) for the National Park covering the period 1 April 2025 to 31 March 2040. Local Development Plan 3 will replace the current adopted Plan (LDP2, adopted September 2020).

1.1.2 The Local Development Plan plays a key role in setting the long-term vision for the Pembrokeshire Coast National Park, allocating land for sustainable development and providing the policy framework against which future planning applications for the National Park will be determined.

1.1.3 Local Development Plan 3 will be prepared in accordance with the Authority's approved Delivery Agreement. The Delivery Agreement sets out the timetable for the preparation of LDP3 and the approach that the Authority intends to take with regard to stakeholder and community engagement and consultation during the preparation of LDP3.

1.2 Background

1.2.1 A full review of the adopted Local Development Plan 2 (LDP2) for the Pembrokeshire Coast National Park commenced in September 2024, and following consultation, the Review Report was published in March 2025. The report considered the key contextual changes since LDP2 was adopted in September 2020, alongside the latest Annual Monitoring Report findings and undertook a full review of the Plan's vision, objectives, strategy, allocations and policies to assess how well the Plan is performing.

1.2.2 The [Review Report](#) concluded that that Plan is performing and delivering well, however, there have been a number of key contextual changes and changes to national policy and legislation since Plan adoption that require a full revision of the LDP. This paper is the first stage in preparing the replacement LDP.

1.3 Purpose of this paper

1.3.1 The Development Plans Manual (Edition 3, March 2020) states that it is a requirement that the key issues, challenges and drivers (economic, environmental, social and cultural well-being aspects), including the requirements of national, regional and local strategies, are identified. The key issues for the adopted plan must be evaluated to determine if they are still relevant, to what degree, and if new issues have arisen. The plan must set out a vision, unique to local circumstances, with overarching objectives that respond to the key issues.

1.3.2 This paper identifies the key issues and challenges for the Pembrokeshire Coast National Park along with the opportunities to address these issues through LDP3. The issues have been informed by a wide range of evidence which are identified in this paper and changes in national policy and legislation have also been taken into account.

1.3.3 The Vision and Objectives which will guide and direct the Plan follows the identification of the key issues. The Vision sets out the core, overarching purpose of LDP3 and sets out how places within the National Park are expected to develop, change, and be protected over the Plan period. The Vision provides the framework for the Preferred Strategy and for the formulation of the detailed policies and proposals for LDP3.

1.3.4 To ensure that the vision is delivered, a set of 16 draft objectives have been developed and will provide the basis for the formulation of detailed policies and proposals to address the key issues identified and the wider social, economic, environmental and cultural well-being issues facing the National Park and how these are to be achieved through the land use planning function of the Authority.

1.3.5 The issues and objectives have been grouped under the four National Park Corporate Priorities: Conservation; Connection and Cultural Heritage; Communities; and Climate and Natural Resources. These themes, also referred to as the '4 Cs', ensure alignment of LDP3 with the Corporate Plan and the recently adopted National Park Partnership Plan, adopted in March 2025.

1.3.6 The objectives also take into account the seven wellbeing goals for Wales, established in the Well-being of Future Generations Act (Wales) 2015 and objectives in the Pembrokeshire Well-being Plan.

1.3.7 The Sustainability Issues and Objectives have also been identified and are included in the Sustainability Appraisal (incorporating the Strategic Environmental Assessment) Scoping Report for LDP3.

1.3.8 [The purpose of this paper is a starting point for A Draft Issues, Vision and Objectives Paper was subject to public consultation and engagement alongside the Draft Sustainability Appraisal incorporating the Strategic Environmental Assessment](#)

Scoping Report for an eight week period from 26 January to 23 March 2026. This provided an opportunity ~~and to provide opportunities~~ for the public and stakeholders to comment on whether we (the National Park Authority) have identified the most important issues and if the vision and objectives align with those who live and work in, or visit, the National Park. Officers held an online engagement event, providing an opportunity for anyone interested to attend. An online presentation was also delivered to the Pembrokeshire Coast National Park's Partnership Forum in March 2026, with members of the Forum invited to complete a short questionnaire and engage in discussion on the key issues, pressures and long-term challenges affecting the National Park. A Report of Consultation, summarising the responses received, together with an officer response and details of the engagement was presented to the National Park Authority on 24 June 2026.

1.4 Relevant Plans, Strategies and Evidence Base

1.4.1 This Issues, Vision and Objectives paper has been informed by a number of key plans, policies and programmes at the national, regional and local levels, all of which are identified and reviewed in the Sustainability Appraisal Scoping Report: Appendix A – Review of Relevant Plans, Policies and Programmes. This ensures that the draft vision and objectives have been formulated in conformity with these documents. These include, but are not limited to, the Pembrokeshire Well-being Plan, the Pembrokeshire Coast National Park Authority (PCNPA) Partnership Plan 2025-2029, the PCNPA Corporate Plan, the LDP2 Review Report, LDP2 Annual Monitoring Reports (2021-2025) and the LDP3 Integrated Sustainability Appraisal.

1.5 Tests of Soundness

1.5.1 The Development Plans Manual (Edition 3, March 2020) sets out the tests of soundness which must be met for Local Development Plans. For this Issues, Vision and Objectives Background Paper, it is considered that the following elements of the soundness tests must be met:

Test 1: Does the plan fit? (i.e. is it clear that the LDP is consistent with other plans?)

In terms of the Issues, Vision and Objectives, the LDP must be in conformity with Future Wales – The National Plan 2040. There is also a need to have regard to national policy (Planning Policy Wales), regional plans and strategies, including the Pembrokeshire Well-being Plan and the National Park Partnership (Management) Plan.

Test 2: Is the plan appropriate? (i.e. is the plan appropriate for the area in the light of the evidence?)

In terms of the Issues, Vision and Objectives, the plan needs to be locally specific, address the key issues, be supported by robust, proportionate and credible evidence and the vision should be positive and sufficiently aspirational.

Test 3: Will the plan deliver? (i.e. is it likely to be effective?)

The Issues, Vision and Objectives paper will need to identify outcomes, based on the issues and vision, that are effective, implementable and deliverable through the land use planning process. Objectives should be SMART (Specific, Measurable, Attainable, Relevant and Time Bound).

2. What are the key issues, challenges and opportunities for the Pembrokeshire Coast National Park?

2.1 The issues identified in the following section have been grouped under the four National Park Corporate Priorities: Conservation; Connection and Cultural Heritage; Communities; and Climate and Natural Resources. The issues are based on robust and detailed evidence base that has considered the environmental, economic, social and cultural well-being challenges facing the National Park and which LDP3 seeks to address. This detailed evidence and statistics are provided in the Sustainability Appraisal Scoping Report: Appendix B – Baseline. The four Corporate Priorities have embedded the seven national well-being goals as required by the Well-being of Future Generations (Wales) Act 2015 and therefore ensures that the Plan considers these from the outset and is able to demonstrate how it will contribute to achieving the goals (see Appendix 2).

2.2 The evidence base and information sources that have been used to help identify the issues, challenges and opportunities are listed next to each issue in the following tables. The Sustainability Appraisal Scoping Report for LDP3 also reviews the appropriate plans, policies and programmes at the national, regional and local levels and includes the following:

2.2.1 **Future Wales – The National Plan 2040:** In February 2021, the Welsh Government published Future Wales which has development plan status. It replaced the Wales Spatial Plan and sets out a 20-year strategic direction for development in Wales. The plan seeks to address key national priorities through the planning system by developing a vibrant economy, achieving decarbonisation and climate resilience, developing strong ecosystems and improving community health. The plan guides infrastructure and development investments and will be further detailed by regional Strategic Development Plans (SDPs) and Local Development Plans (LDPs) which are required to be in conformity with Future Wales.

2.2.3 Future Wales contains a national spatial strategy and introduces four regions in Wales: The North, Mid Wales, The South West and The South East. The plan specifies ‘where Wales will grow’ (Policy 1) through the identification of national and regional growth areas. For each of the regions the plan highlights key locations for growth, opportunities for development infrastructure and sets a framework for regional and local planning. Future Wales states that: ‘National Park Authorities are unique planning entities with a specific remit to reflect the distinctive characteristics of their areas...and that Future Wales policies respect the functions of National Parks in terms of their statutory purposes...’ (page 104).

2.2.4 The LDP must be in general conformity with Future Wales by ensuring the strategy, proposals and policies conform with the spatial strategy for the South West region and support and not compete with the regional growth areas of the Pembrokeshire Haven Towns. The LDP must align with the policies by supporting climate action and the move to net zero, apply the placemaking principles, support a town centre first approach, protect landscapes and biodiversity and ensure housing and services are integrated with infrastructure investment.

2.2.5 A review of the draft objectives against the Future Wales 2040 Outcomes can be found in Appendix 3.

2.2.6 [Planning Policy Wales \(Edition 12, February 2024\)](#): Planning Policy Wales (PPW) has been updated twice since adoption of LDP 2 in 2020. Edition 11 (2021) aligned PPW with 'Future Wales: The National Plan 2040' and emphasised sustainable, well-integrated places. Edition 12 (2024) introduced requirements for planning authorities to consider localised issues such as the prevalence second homes and short-term lets, detailed green infrastructure needs, mandated net biodiversity benefits and securing these benefits through a stepwise approach. Additionally, it provides a strengthened policy approach to the protection for Sites of Special Scientific Interest (SSSI) and guidance on trees and woodlands, with the promotion of new planting. These updates will need to be reflected in the replacement Local Development Plans.

2.2.7 Planning Policy Wales (PPW) sets out the land use planning of the Welsh Government. The primary objective of PPW is to ensure the planning system contributes to the delivery of sustainable development to improve the economic, social, environmental and cultural well-being. PPW requires the planning system to embrace the concept of placemaking in order to create sustainable places and improve the well-being of communities. PPW sets out the National Sustainable Placemaking outcomes which are a set of key objectives under the following five themes; Creating and Sustaining Communities; Growing Our Economy in a Sustainable Manner; Making Best Use of Resources; Maximising Environmental Protection and Limiting Environmental Impact and Facilitating Accessible and Healthy Environments. PPW is organised around four overarching themes:

- Strategic and Spatial Choices to ensure the sustainable management of natural resources and promote good design and placemaking that protects the Welsh Language.
- Active and Social Places to ensure services are accessible, promote active travel, have vibrant retail centres, protect community facilities and encouraging inclusive design.
- Productive and Enterprising Places to support economic development including tourism and the rural economy and effective land use.

- Distinctive and Natural Places to protect and enhance the landscape, historic and built environment, deliver green infrastructure and deliver net benefit for biodiversity.

2.2.8 The LDP must align with the policies and principles in PPW in the plan's evidence base, spatial strategy, site allocations, policies and monitoring framework.

2.2.9 A review of the draft objectives against the National Sustainable Placemaking Outcomes can be found in Appendix 4.

2.2.10 **Pembrokeshire Well-being Plan:** The Well-being of Future Generations Act requires Public Service Boards to produce a Well-being Plan, which details how it will improve the economic, social, environmental and cultural well-being of their respective areas.

2.2.11 The Pembrokeshire Well-being Plan identifies four objectives to act as the framework through which the Public Service Board prioritises key areas of focus in the plan. The four objectives are:

- Support growth, jobs and prosperity and enable the transition to a more sustainable and greener economy.
- Work with our communities to reduce inequalities and improve well-being.
- Promote and support initiatives to deliver decarbonisation, manage climate adaptation and tackle the nature emergency.
- Enable safe, connected, resourceful and diverse communities.

2.2.12 The LDP should ensure its strategy and policies contribute to the well-being goals and the objectives and actions identified in the Well-being Plan for Pembrokeshire of strengthening bilingual communities to support jobs, tackle inequalities and also tackle the climate and nature emergencies.

2.2.13 A review of the draft objectives against the Pembrokeshire Well-being Plan Objectives can be found in Appendix 5.

2.2.14 **South West Wales Area Statements (Natural Resources Wales):** The statements cover the Local Authority areas of Swansea, Neath Port Talbot, Pembrokeshire and Carmarthenshire. It identifies the key risks, opportunities and priorities for building resilience of ecosystems and supporting the sustainable management of natural resources under four focus areas:

- Reducing health inequalities.
- Ensuring sustainable land management.
- Reversing the decline of, and enhancing biodiversity.
- Mitigating and adapting to climate change.

2.2.15 The LDP is required to embed sustainable management of natural resources throughout plan preparation and contribute to ecosystem resilience, climate mitigation and adaptation, biodiversity and promoting access to green infrastructure

to ensure social and economic well-being including benefits for health and reducing inequalities.

2.2.16 A review of the draft objectives against the NRW South West Wales Area Statements can be found in Appendix 5.


2.2.17 [Pembrokeshire Coast National Park Partnership Plan 2025-2029](#): The Partnership Plan provides a strategic framework to guide the collaborative efforts of key partners and stakeholders in conserving, enhancing and sustainably managing the National Park over the five years covered by the plan. The plan aims to coordinate the work of various stakeholders including public bodies, communities, and individuals, and deliver on the statutory purposes of the National Park: conservation, public enjoyment and understanding.

The plan is structured around four core themes:

- **Conservation**
 - Protect and enhance the Park's landscapes, biodiversity and cultural heritage.
 - Address threats such as habitat loss, pollution and invasive species.
- **Connection**
 - Foster deeper public engagement with nature and heritage.
 - Improve access and inclusivity, ensuring all communities can enjoy and benefit from the Park.
- **Communities**
 - Strengthen local communities through sustainable development.
 - Support well-being, economic opportunities, and cultural identity.
 - Encourage active participation in decision-making and stewardship.
- **Climate and Natural Resources**
 - Support climate resilience and adaptation.
 - Promote sustainable land and marine resource management.
 - Encourage low-carbon practices and nature-based solutions.

2.2.18 It is important to note that the LDP2 Annual Monitoring Reports have assessed the extent to which the strategy and policies are being achieved by measuring various indicators to assess the performance of individual planning policies as set out in the adopted LDP2, providing a general portrait of the social, economic and environmental conditions in the National Park. These, along with the Review Report, conclude that the Plan's policies and proposals are being implemented, and performing, as intended. Many of the issues identified in LDP2 will continue to be pertinent for LDP3 but will need to be considered within contextual changes and changes to national policy and legislation.

Table 1: Draft Issues

 CONSERVATION: Conserve and enhance landscapes, seascapes, natural beauty and wildlife			
No.	Key Issue and Commentary	Context / Sources	How can LDP3 have an influence on this issue?
1	<p>Conservation of Landscape and Seascape and National Park Special Qualities:</p> <p>The Pembrokeshire Coast National Park is a designated landscape with recognised special qualities which are central to National Park purposes as set out in the Environment Act 1995. Development pressures will need to be balanced against conservation and enhancement of special qualities which bring wider benefits to people's health and well-being and in sustaining communities and the economy.</p> <p>Development outside the National Park may have an impact on the special qualities.</p>	<ul style="list-style-type: none"> • PCNPA Partnership Plan • Celtic Freeport • South West Wales Regional Energy Strategy (SWW CJC) 2022 • Pembrokeshire's Local Area Energy Plan (LAEP) 2022 • Welsh National Marine Plan (WNMP) 2019 	<ul style="list-style-type: none"> • Strategic policy to conserve and enhance the special qualities of the National Park (Sandford Principle). • Specific landscape and seascape policies. • Direct development to the most sustainable locations within the National Park, in line with the Settlement Hierarchy. • Specific policies to address the need for housing, renewable energy (including offshore infrastructure) Celtic Freeport development, coastal change, changing agricultural practices and pressures from tourism.

2	<p>Conservation and enhancement of biodiversity and habitat connectivity:</p> <p>The National Park is renowned for its outstanding natural environment and has an extensive network of international, national and locally important sites which have a rich diversity of species and habitats. Some of these sites are in an 'unfavourable condition' and are becoming affected by development, agricultural intensification, recreation and climate change. Habitats need to be restored and connected so at least 30% of the National Park is designated for nature by 2030. This will respond to the Climate and Nature Emergencies as well as providing wider social, economic and health and well-being benefits.</p>	<ul style="list-style-type: none"> • Planning Policy Wales (PPW) Edition 12 • Biodiversity Deep Dive • South West Wales Area Statement - NRW • Nature Network Maps – NRW • State of Natural Resources Report 2025 • Pembrokeshire Nature Partnership • Pembrokeshire wellbeing Plan • Nature Recovery Action Plan for Pembrokeshire (2018) • Local Biodiversity Action Plan for Pembrokeshire • Buglife Important Invertebrate Areas 	<ul style="list-style-type: none"> • Ensure development avoids harm to protected areas including Site of Special Scientific Interest (SSSI), Special Areas of Conservation (SACs), including Marine, Special Protection Areas (SPAs) and Ancient Woodlands. • Ensure new development delivers net benefit for biodiversity including space for green corridors, SuDS, tree planting, or habitat buffers. • Using GI outputs to help safeguard and manage at least 30% of land for nature by 2030, in line with PPW12 and national biodiversity commitments. • Cross cutting GI delivery with climate change adaptation (flood risk, shade, cooling), health and wellbeing (accessible green spaces), and active travel (safe, green walking/cycling routes). • Policy to conserve and enhance locally designated sites.
3	<p>Conservation and enhancement of dark skies:</p> <p>Whilst parts of the Pembrokeshire Coast National Park are still relatively dark with minimal impact on the night sky, light pollution caused by inappropriate and/or unnecessary lighting is an increasing problem for other areas, including the larger settlements and from agriculture. Poor lighting has impacts for people's health and well-being,</p>	<ul style="list-style-type: none"> • Planning for the Conservation and Enhancement of Dark Skies in Wales Good Practice Guidance • Planning Policy Wales (PPW) Edition 12 • NRW/LUC Dark Skies and Light Pollution Mapping • PCNPA Partnership Plan 2025-2029 	<ul style="list-style-type: none"> • Develop a policy framework to conserve and enhance the darkest areas of the National Park by controlling external and to minimise light spill on new development. • Identification of areas where improvements of poor lighting can be addressed by retrofitting. • Specific policies to address the impacts of lighting on wildlife species and habitats, cross cutting with GI delivery. • Cross-cutting with climate change and adaptation.

	wildlife species and habitats, increases carbon emissions and improvements will respond to the Climate and Nature Emergencies as well as providing opportunities for improved health and well-being.		
4	<p>Conservation and enhancement of soundscapes and tranquillity:</p> <p>Soundscapes and Tranquillity are identified as one of the National Park’s special qualities and relate to the sounds associated with particular landscapes. Increasing industrial activity, including that associated with the Celtic freeport, renewable energy installations and communications infrastructure along with existing military activity and increased car ownership increasing traffic noise have the potential for adverse impacts on this special quality.</p>	<ul style="list-style-type: none"> • PCNPA Partnership Plan 2025-2029 • NRW Tranquillity mapping. • Welsh Government Noise and Soundscape Plan for Wales 2023-2028 	<ul style="list-style-type: none"> • Ensure new development is directed to the most sustainable locations to minimise the impact on soundscapes and tranquillity. • Develop a policy framework to conserve and enhance those locations that are recognised as the most tranquil within the National Park, cross cutting with the overarching strategic policy.



CONNECTION AND CULTURAL HERITAGE: Conserve and enhance cultural heritage, Welsh language and enhance equitable access to the National Park

No.	Key Issue and Commentary	Context / Sources	How can LDP3 have an influence on this issue?
Well-being			
5	<p>Promotion of physical and mental health and well-being:</p> <p>Whilst the general health of the population is similar to that for Wales as a whole, the ageing population will present challenges relating to physical and mental health. This is likely to place pressure on health services and facilities as well as presenting challenges in accessing such services. Opportunities for individuals to access the National Park for health and well-being benefits may be restricted by poor access to public transport.</p>	<ul style="list-style-type: none"> • Well-Being Plan for Pembrokeshire • A Healthier Wales: our Plan for Health and Social Care (2021) • Healthy Weight Healthy Wales 	<ul style="list-style-type: none"> • Ensure housing, employment, services and facilities are provided in locations accessible by active travel methods and public transport. • Ensure quality, well designed places, that includes housing which is affordable, accessible, and appropriate for the local needs. • Provide opportunities to access play, recreation and open spaces. • Support the provision of green and blue infrastructure.
6	<p>Provision of sustainable transport and access to services:</p> <p>The National Park is a predominately rural area with a dispersed, ageing population who are reliant on the private car. However, it also contains key service centres, including Tenby, Saundersfoot, St Davids and Newport, which provide a range of services and facilities for residents, visitors and surrounding rural communities. There is significant seasonal visitor traffic in the summer which places a strain on the designated landscape. There are limited and unreliable public transport options for</p>	<ul style="list-style-type: none"> • Future Wales: The National Plan 2040 • Planning Policy Wales (PPW) Edition 12 • Llwybr Newydd: the Wales Transport Strategy (2021) • National Transport Delivery Plan 2022 to 2027 • Active Travel Guidance (2021) 	<ul style="list-style-type: none"> • Direct development to the most sustainable locations with access to services and facilities by sustainable modes of travel • Promote the sustainable transport hierarchy (see Planning Policy Wales) to give priority to meeting demand for travel by: active travel through walking and cycling throughout towns and villages, including Public Rights of Way, cycle routes and named trails; increase access to public transport (including rail, bus and rural demand-responsive services such as Fflecsi) and support charging infrastructure to ultra low emissions vehicles in appropriate locations.

	<p>residents and visitors (infrequent buses and slow rail) which presents a barrier for some in accessing the Park and local services.</p>	<ul style="list-style-type: none"> • South West Wales Regional Transport Plan 2025-2030 • Clean Air Plan for Wales: Healthy Air, Healthy Wales (2020) • South West Wales Energy Strategy (2022) 	<p>These measures will also support physical and mental health, reduce inequalities and contribute to net zero by decarbonising travel, while improving access to services, facilities and the countryside, coast and Pembrokeshire Coast Path.</p> <ul style="list-style-type: none"> • Protect community facilities to ensure equitable access.
Welsh Language, Culture and Heritage			
7	<p>Protection and promotion of Welsh language, local dialects and culture:</p> <p>Welsh Language and Pembrokeshire dialects are identified as one of the National Park’s special qualities, however the number of Welsh Speakers in the National Park has declined slightly since the 2011 census. Whilst the use of the Welsh language depends on a number of factors outside the remit of the planning system, opportunities to use of the Welsh language in the National Park need to be promoted and enhanced.</p>	<ul style="list-style-type: none"> • Commission for Welsh-speaking Communities GOV.WALES • Welsh Language (Wales) Measure 2011 • Cymraeg 2050: A Million Welsh Speakers 	<ul style="list-style-type: none"> • Policy framework to eliminate, reduce or mitigate against development proposals, for example, housing, community infrastructure or employment opportunities that could have negative impacts on the Welsh language, and to support proposals that have a positive impact on the Welsh language. • Identify Welsh Language Sensitive Areas where the language is sensitive or significant. • Identify locations / communities / landscapes where opportunities to promote the Welsh language, culture and local dialects can be safeguarded and enhanced. • Cross-cutting links with the provision of housing, including affordable homes, second homes and holiday lets and employment opportunities. • Policy to require the assessment of large windfall developments within identified Welsh Language-Sensitive Areas.

8	<p>Conservation and enhancement of landscapes of historic interest, Conservation Areas, historic buildings and their settings:</p> <p>The National Park has numerous landscapes of historic interest and built heritage resource in respect of the archaeological resource, Scheduled Monuments, Historic Parks and Gardens, Conservation Areas and Listed Buildings. These, along with their settings, are likely to come under pressure from development, climate and coastal change and will require conservation and enhancement.</p>	<ul style="list-style-type: none"> • Historic Environment (Wales) Act 2023 	<ul style="list-style-type: none"> • Ensure development conserves and enhances heritage assets including listed buildings, conservation areas, scheduled monuments and historic parks and gardens and their settings. • Policies to conserve, enhance and promote opportunities to enjoy the historic environment, local character and cultural identity of the National Park. • Consider adding lists of buildings and features of local importance to the Conservation Area Supplementary Planning Guidance documents to identify, conserve and enhance locally important buildings, features and settings.
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COMMUNITIES: Foster the socio-economic well-being of National Park communities

No.	Key Issue and Commentary	Context / Sources	How can LDP3 have an influence on this issue?
Social			
9	<p>De-population, ageing population and outmigration of young people:</p> <p>The population of the National Park decreased between the 2011 and 2021 Census', from 22,644 to 20,933. This population decline of 7.6% was the largest population decline of all the National Parks in England and Wales. There was a decline in all age categories under age 64 which is in part due to a lack of job opportunities and high house prices. There was an increase in all age categories over age 65 which is presenting an ageing population and a challenge for the provision of services and communities.</p>	<ul style="list-style-type: none">• Household projections for National Parks, 2018 based• Age friendly Wales: our strategy for an ageing society (Welsh Government)• Pembrokeshire Local Housing Market Assessment 2023• Pembrokeshire Local Housing Strategy 2024-2029	<ul style="list-style-type: none">• Consider and analyse a range of growth options to assess how growth options impact on the age profile of the National Park.• Identify a suitable housing and affordable housing target and identify suitable and deliverable sites for housing, including affordable housing led sites, taking account of the designated landscape of the National Park.• Enable the delivery of a mix of housing types and tenures and employment opportunities to retain and attract young people, which may also support the use of the Welsh language.• Facilitate the delivery of homes suitable and accessible for an ageing population.• Promote the delivery of accessible and adaptable homes for an ageing population and assess the policy implications of requiring an appropriate percentage of new market homes to be built to Lifetime Homes Standard.• Assess the need for specialised housing, including sheltered and extra care housing.• Ensure new housing development is suitably located, taking account of environmental and physical constraints, including landscape and visual impact.

10	<p>High level of need for affordable housing:</p> <p>The Local Housing Market Assessment 2025 2023 identifies a high level of unmet affordable housing need with over 5,000 households on the housing register in 2023, with a net need for 82 affordable homes per annum in the National Park. There is a predominate need for one-bedroomed social rented properties.</p>	<ul style="list-style-type: none"> • Household projections for National Parks, 2018 based • Pembrokeshire Local Housing Market Assessment 2023 • Pembrokeshire Local Housing Strategy 2024-2029 • Welsh Development Quality Requirements (WDQR) 2021 	<ul style="list-style-type: none"> • Examine the viability of development to maximise affordable housing delivery through section 106 agreements. • The level of affordable housing need will be higher than the planning system can deliver. Set a target for affordable housing delivery and identify suitable and deliverable sites for housing, including affordable housing led schemes by Registered Social Landlords (RSLs) or community-led affordable housing, including schemes delivered using social housing grant. • Develop policies to ensure housing is appropriate in size, tenure and location to meet the identified need. • Include a policy to support affordable housing exception sites. • Has cross-cutting links with the protection and promotion of Welsh language and culture. • Ensure new housing development is suitably located, taking account of environmental and physical constraints, including landscape and visual impact.
11	<p>High numbers of second homes and holiday lets:</p> <p>Pembrokeshire has the second highest levels of second homes and holiday lets in Wales. Whilst a certain number are essential to support the tourism sector on which Pembrokeshire relies, this can cause difficulties for National Park residents to buy or rent homes. It can also have an impact on the viability of community services and facilities and vitality and use of the Welsh language.</p>	<ul style="list-style-type: none"> • Planning Policy Wales (PPW) Edition 12 • The Town and Country Planning (Use Classes) (Amendment) (Wales) Order 2022 • Pembrokeshire Local Housing Market Assessment 2023 • Second homes: Developing new 	<ul style="list-style-type: none"> • LDP3 will review the number of second homes and holiday lets for tourism purposes on which the National Park relies and their impact on communities. National planning policy in Planning Policy Wales requires Planning Authorities to consider suitable policy measures, which may include a cap or ceiling on the number of second homes or short-term lets. • Has cross-cutting links with de-population, ageing population and outmigration of young people, the high level of need for affordable housing and the protection and promotion of Welsh language and culture.

		policies in Wales (2021)	
12	<p>Meeting the need of the Gypsy, Travellers and Showpeople population:</p> <p>Pembrokeshire has a high population of Gypsies, Travellers and Showpeople. The January 2025 caravan count recorded 178 caravans in Pembrokeshire, which was the third highest in Wales. The Pembrokeshire Gypsy and Traveller Accommodation Assessment 2019 identified a total need for 39 residential pitches over the period 2019 to 2033. No specific need has been identified in the National Park and it is anticipated the need will be met by allocations in Pembrokeshire County Council's LDP 2.</p>	<ul style="list-style-type: none"> • Pembrokeshire Gypsy and Traveller Accommodation Assessment 2019 • Welsh Government Gypsy and Traveller Caravan Count 	<ul style="list-style-type: none"> • Include a criteria based policy to assess planning applications for the development of sites in appropriate locations for Gypsies, Travellers and Showpeople.
13	<p>Poverty and inequality (especially childhood poverty)</p> <p>The Well-being Plan for Pembrokeshire identifies poverty and inequalities as a priority area. Statistics show Pembrokeshire's child poverty rate being amongst the highest in Wales, based on children aged 0-15 living in households with below 60% median income before housing costs. Poverty and poor living conditions can have an impact on educational achievement, qualifications and health and wellbeing.</p>	<ul style="list-style-type: none"> • Well-being plan for Pembrokeshire • Tackling Poverty: Our Strategy 2023 (Pembrokeshire Public Services Board) • PCNPA Partnership Plan (2025-2029) 	<ul style="list-style-type: none"> • Facilitate the delivery of suitable housing, including affordable housing to meet the identified needs of the population • Provide opportunities to support the delivery of well-paid employment opportunities • Promote active travel opportunities throughout towns and villages, which will also support physical and mental health and reduce inequalities. • Ensure housing, employment, services and facilities are provided in locations accessible by active travel methods and public transport. • Facilitate the provision of play, recreation and open spaces to support nature, promote physical and mental health and well-being and reduce poverty and inequalities.

14	<p>Placemaking and sustainable design</p> <p>Whilst the National Park is a champion for high design standards with respect the landscape character and capacity there is a need to consistently uphold this standard. New development may undermine local distinctiveness and the qualities that give each settlement its unique identity, potentially threatening the Park’s natural, cultural, and built heritage and limiting opportunities for positive placemaking and resilient communities.</p>	<ul style="list-style-type: none"> • Wales Placemaking charter (2020) • Welsh Development Quality Requirements (WDQR) 2021 • Future Wales: The National Plan 2040 • Planning Policy Wales (PPW) Edition 12 • TAN 12: Design • Net Zero Wales 2021-2025 • Pembrokeshire Local Housing Strategy 2024-2029 	<ul style="list-style-type: none"> • Work in combination with other identified issues such as the nature and climate emergencies, community cohesion, health and wellbeing, accessibility, and transport. • Set policies to ensure development achieves high standards in terms of sustainable design with all new dwellings meeting the standards set out in national planning policy including a potential policy requirement for Lifetime Homes Standards • Address energy efficient and climate responsive design at an early stage in the design process through appropriate densities and patterns of development and the incorporation of sustainable building design • Consider a replacement dwelling policy to enable consideration of embedded carbon in existing dwellings • Encourage the sensitive retrofitting of existing buildings (insulation, e.g. renewables, heat pumps etc.) while respecting character, heritage, and landscape qualities. • Promote nature-based solutions, such as SuDS, green infrastructure, and carbon-sequestering practices that also enhance place quality.
Economic			
15	<p>Employment opportunities – fair work, seasonal, low paid etc.</p> <p>Employment in the National Park is often low-paid and seasonal, with earnings below the Wales average and winter benefit claims nearly double summer levels. High house prices and rents (median 2023 prices are 9.7 times median wages) create particular challenges for young people. The National Park’s ageing population,</p>	<ul style="list-style-type: none"> • South West Wales Regional Economic Delivery Plan 2022 • Celtic Freeport • PCNPA Partnership Plan (2025-2029) 	<ul style="list-style-type: none"> • Promote policies to protect existing employment land and premises and work with landowners to bring forward underused/vacant/ brownfield land in sustainable locations within or adjacent to centres. • Collaboration with Pembrokeshire County Council to encourage future development of land adjacent to Regional Growth areas to deliver

	<p>low numbers of working age individuals and lack of brownfield development sites is limiting opportunities for employment growth.</p>		<p>economic growth throughout the region and support high quality jobs (Celtic Freeport).</p> <ul style="list-style-type: none"> • Facilitate opportunities for green energy jobs • Facilitate the delivery of improved rural broadband and high speed internet connections to address digital exclusion in rural areas • Facilitate employment accessibility and promote active travel reducing the need to travel to work by private car. • Has cross-cutting links with de-population, ageing population and outmigration of young people and the protection and promotion of Welsh language and culture.
16	<p>Balancing the competing demands of tourism against the protection of the National Park’s special qualities and its communities</p> <p>Tourism plays a significant role in the National Park’s economic performance, with the economic Impact between 2020 and 2021 increasing by 95% and total visitors also increasing by 102% in this period (partially attributable to travel restrictions associated with the Covid-19 pandemic). Therefore, balancing these benefits while maintaining long-term sustainability may risk undermining both the environment and character that attract visitors to the National Park. Seasonal peaks at campsites contribute significantly to this pressure, leading to adverse landscape and visual impacts and placing disproportionate demands on local infrastructure during summer months.</p>	<ul style="list-style-type: none"> • Economic Impact of Tourism in Pembrokeshire 2024 • Pembrokeshire Destination Management Plan • Article 4(1) Direction for 28-day sites for camping, caravans and mobile homes 	<ul style="list-style-type: none"> • Promote tourism development to become more regenerative that actively restores or enhances the National Parks landscape, biodiversity, and cultural heritage – in combination with landscape & seascapes policy. • Review the National Park’s landscape and seascape sensitivity relating to new tourism development, especially new camping and caravanning development. • Facilitate the delivery of development to support year-round, off-peak tourism, and to reduce seasonal pressures.

17	<p>Retail and changing town centres</p> <p>The National Park's mean retail vacancy rate remains low at around 4.5%, reflecting strong resilience in its centres. However, ongoing shifts toward online shopping and experience-led visits are likely to drive lasting change. Policies that tightly define retail uses may restrict diversification and reduce adaptability to evolving retail and leisure trends.</p>	<ul style="list-style-type: none"> • Future Wales: The National Plan 2040 • PPW12 • Technical Advice Note (TAN) 4: Retail and Commercial Development • Together for Retail: Wales Retail Forum Action Plan (2023) • Welsh Government Town Centres First Position Statement (2023) • LDP 2 Annual Monitoring Reports (Indicator 34 on retail vacancy rates) 	<ul style="list-style-type: none"> • Review current retail areas in the National Park and consider changes where necessary to primary retail frontages and the consideration of secondary frontages to reflect updated retail survey evidence and new development such as the Saundersfoot Harbour regeneration scheme • Consider and adapt to how changing shopping habits are reshaping the role of retail centres, with visitors seeking not only buying goods but also experiences. • Consideration of upper-floor uses to maximise space efficiency and the viability and vitality of the National Park's retail centres.
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CLIMATE AND NATURAL RESOURCES: Reduce and adapt to the impacts of climate change and manage natural resources sustainably

No.	Key Issue and Commentary	Context / Sources	How can LDP3 have an influence on this issue?
18	<p>Water Quality - riverine, marine, phosphates and Dissolved Inorganic Nitrogen (Nitrate, Nitrite and Ammonium), nitrates, DIN)</p> <p>The National Park's water environment, a key habitat for wildlife in Wales, faces increasing pressures from nutrient pollution, primarily from agriculture, sewage treatment, and diffuse sources. Many water bodies are classified as "Moderate" (WFD Cycle 3, 2021), and increasing nutrient levels are causing some to fail Habitats Regulations Assessments. This presents a significant challenge for the Authority, as it can delay housing and infrastructure development until nutrient neutrality solutions are implemented, potentially constraining sustainable growth and land use planning within the Park.</p>	<ul style="list-style-type: none"> • The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 • NRW Guidance: Nitrates & Phosphates <ul style="list-style-type: none"> - Condition assessments for Welsh European marine sites (EMS) - Conservation advice for European marine sites (Reg 37) - Compliance Assessment of Welsh River SACs Against Water Quality Targets 2024 • All Wales Nutrient Calculator • Water Resources (Control of Agricultural Pollution) (Wales) 2021 Regulations • Dŵr Cymru Welsh Water Asset Management Programme 8 2025-30 (AMP 8) 	<ul style="list-style-type: none"> • Require new development in failing SAC catchments to demonstrate no deterioration of the SAC habitat, with improvement sought for any proposals affecting SAC integrity. Development can be supported by nutrient statements or budget calculations, and, where possible, contribute to habitat restoration in line with the Habitats Regulations, alongside measures to achieve nutrient neutrality. • Require new development in failing SAC catchments to demonstrate nutrient neutrality or improvement, supported by nutrient statements or budget calculations. • Promote Require mitigation where nutrient loads increase, e.g., upgraded treatment works, improved agricultural practices, green infrastructure, constructed wetlands, or nutrient trading/offsetting. • Ensure development accounts for sewer and treatment capacity, requiring upgrades, infrastructure contributions, or off-site solutions where limits are exceeded; set thresholds for connection where necessary.

		<ul style="list-style-type: none"> • Technical Advice Note 5: Nature Conservation and Planning • Planning Policy Wales (PPW) Edition 12 • Future Wales 2040 	
19	<p>Flooding and Coastal Change</p> <p>Southwest Wales Stage 1 SFCA identifies that the National Park is at risk predominantly from tidal flooding. Instances of flooding and extreme weather events accelerating coastal erosion are increasing in frequency, which will result in an increase in damage and disruption. The revised Plan will need to identify the number of properties, services and infrastructure at risk of flooding.</p>	<ul style="list-style-type: none"> • TAN15 • Flood Maps for Planning NRW • Strategic Flood Consequences Assessment • South West Wales Area Statement - NRW • National Strategy for Flood and Coastal Erosion Risk Management in Wales (2020) • Climate Change (Wales) Regulations (2021) • Climate Adaptation Strategy for Wales (2024) • Welsh National Marine Plan (WNMP) • West of Wales Coastal Group • Swansea and Carmarthen Bay Coastal Engineering Group 	<ul style="list-style-type: none"> • Direct development away from areas at risk from flooding. • Direct development away from coastal areas where it would exacerbate or give rise to coastal squeeze, ensuring the protection of coastal habitats and allowing for their natural adaptation to sea level rise. • Use policies within the SMP to recognise areas where managed realignment or no active intervention are the preferred long-term strategy strictly limiting development in areas where erosion is predicted or require compensatory measures. • Require flood-resilient design, buffers, green infrastructure, escape routes, natural flood storage, raised floor levels for development in identified flood zones. • Policies to align development identified in a flood zone to the SuDS Approval Body (SAB) procedure, supporting the implementation of sustainable drainage systems on new developments and prevent surface water discharge to the public sewerage network, to reduce pressure on sewer capacity and minimise flood risk.

20	<p>Renewable and low carbon energy:</p> <p>Renewable energy generation is required to meet national targets, mitigate the factors contributing to climate change and to reduce the dependence on fossil fuels. Provision and increase of renewable energy infrastructure will need to be balanced against landscape and seascape character and special qualities considerations.</p>	<ul style="list-style-type: none"> • Future Wales 2040 • Future Wales 2040 • Review of Wales' Renewable Energy Targets: summary of responses • Renewable-Energy-Assessment-Updated-January-2016.pdf • Pembrokeshire's Local Area Energy Plan (LAEP) 2022 	<ul style="list-style-type: none"> • Provision of a positive policy framework for renewable energy balanced against landscape / seascape and visual impacts. • Consider specific policies for domestic micro generation, recognising that some will fall under permitted development rights. • Consider a policy for community owned renewable energy generation. • Policy framework and SPG guidance on Floating Offshore Wind generation (FLOW). • Support opportunities for heat networks, local renewable and low carbon energy generation schemes, and the co-location of new proposals and land allocations with existing developments, heat suppliers and heat users. • Cross-cutting with Best and Most Versatile Agricultural Land.
21	<p>Climate change and adaptation</p> <p>Climate change is expected to bring warmer temperatures, shifting precipitation patterns, and more extreme weather particularly to coastal areas. In response to the Climate Emergency, the Authority has pledged to cut carbon emissions in the National Park by half by 2030, as part of a transition to net zero by 2050. This issue will be a key driver of the Plan, making it essential that all development is planned and designed with a precautionary, long-term approach, ensuring resilience to the impacts of climate change.</p>	<ul style="list-style-type: none"> • Climate Adaptation Strategy for Wales (2024) • South West Wales Area Statement (Natural Resources Wales), 2020 • Pembrokeshire Climate Adaptation Strategy (Public Services Board) 2022 • PCNPA Partnership Plan (2025-2029) • Natural Resources Wales / Marine Area Statement 	<ul style="list-style-type: none"> • Ensure new development has built in resilience to climate change, e.g. energy efficient design in new buildings, encourage nature-based solutions, and promote circular economy principles such as sustainable construction and resource efficiency. • Direct growth to sustainable locations, reducing the need to travel and promote opportunities to participate in active travel and use sustainable transport to reduce emissions. • Avoid locating development in areas at risk of flooding, coastal erosion, or other climate hazards. • Policies to protect and improve water resources through increased efficiency and demand management of water, particularly in those areas where additional water resources

			may not be available. For new development this may be achieved through measures such as water saving devices, rainwater harvesting and grey water recycling.
22	<p>Best and Most Versatile Agricultural Land</p> <p>A significant proportion of the National Park (45.6%) is Best and Most Versatile (BMV) agricultural land (Agricultural Land Classification Grades 1, 2,& 3a), with Grades 2 and 3a exceeding the Welsh average. There is a need to balance and assess any loss of BMV against the requirement for development to meet community needs.</p>	<ul style="list-style-type: none"> • Predictive Agricultural Land Classification Map (Wales) • Future Wales 2040 • PPW 12 • PCNPA Partnership Plan (2025-2029) • The Agriculture (Wales) Act 2023 Introducing the Sustainable Land Management Framework 	<ul style="list-style-type: none"> • Include policies resisting development on BMV agricultural land unless overriding need is demonstrated with evidence. • Seek to maximize appropriate development on brownfield land and lower grade agricultural land • Require developers to provide site-specific Agricultural Land Classification surveys where development on potential BMV land is proposed. • Integrate BMV land protection with wider LDP objectives, such as climate change resilience, nature recovery, and biodiversity net gain. • Consider the establishment of thresholds for when loss of BMV is acceptable - e.g. for overriding community, renewable energy, housing or infrastructure needs.
23	<p>Minerals:</p> <p>The National Park currently contributes to the West Wales region in terms of minerals reserves and supply. Whilst it is recognised that beyond the current permitted reserves there should be no future allocations within the National Park (except in exceptional circumstances), there will be a need to ensure adequate future supplies for the region.</p>	<ul style="list-style-type: none"> • Future Wales 2040 • Regional Technical Statement for North Wales and South Wales Regional Aggregate Working Parties, 2nd Review • Statement of Sub-regional Collaboration for the South West Wales Sub-Region on the Regional Technical Statement, 2nd Review 	<ul style="list-style-type: none"> • Policies to ensure the safeguarding of mineral resources • Policy framework to ensure that there are no new mineral workings or extensions (unless exceptional circumstances) in the National Park. • Statement of Sub-regional Collaboration to ensure that the region can meet the requirements of the West Wales region. • Ensure existing mineral workings are restored at the end of their permissions which will contribute to nature and biodiversity targets and the green infrastructure network.

24	<p>Reduce carbon emissions / transition to net zero energy</p> <p>The Welsh Government declared a Climate Emergency in 2019 and is committed to achieving net zero carbon by 2050. There is a large reliance on the private car in the National Park and there is a need to support our energy, transport and buildings transition to net zero.</p>	<ul style="list-style-type: none"> • Pembrokeshire Local Housing Strategy 2024-2029 • Welsh Government consultation on changes to Building Regulations Part L (conservation of fuel and power) • Net Zero Wales: Carbon Budget 2 • South West Wales Energy Strategy (2022) • Heat Strategy for Wales (2024) • Pembrokeshire Climate Adaptation Strategy (Public Services Board) 2022 • National Parks Net Zero Report, Small World Consulting 	<ul style="list-style-type: none"> • Direct development to most sustainable locations with access to services and facilities by sustainable modes of travel • Promote the sustainable transport hierarchy (see Planning Policy Wales) to give priority to meeting demand for travel by: active travel through walking and cycling throughout towns and villages; increase access to public transport and support charging infrastructure to ultra low emissions vehicles in appropriate locations. These measures will also support physical and mental health, reduce inequalities and contribute to net zero by decarbonising travel. • Ensure new development delivers net benefit for biodiversity including space for green corridors, SuDS, tree planting, or habitat buffers. • Facilitate the provision of renewable energy in appropriate locations. • Consider the viability implications of policies to require net zero dwellings and buildings
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3. The Draft Vision for the Pembrokeshire Coast National Park 2040

3.1.1 The overarching Vision for the Plan sets out how the National Park is planned to develop, change or be protected throughout the Plan period. It also provides the framework for the Plan's strategy and detailed policies that will guide and manage development.

3.1.2 The existing LDP2 Vision has been reviewed and along with consideration of the key issues and contextual, policy and legislation changes, the Authority has decided to develop a new, updated draft Vision that is a better reflection of the current challenges and opportunities facing the National Park up to 2040, and one that is consistent with the Well-being Plan, the Corporate Plan and the Partnership Plan.

3.1.3 In compliance with the Development Plans Manual (Edition 3), the vision must be a concise, focused and positive statement, include a spatial, land-use emphasis that reflects the varying geographical differences within the broader Planning Authority area and be specific and appropriate, based on a clear understanding of the economic, social, environmental and cultural well-being issues. In addition, the vision must be consistent with the well-being objectives and plan and other local strategies including Area Statements and the National Park Partnership Plan.

3.4 Consistency with other Plans

3.4.1 The [Pembrokeshire Well-being Plan](#) details how it will improve the economic, social, environmental and cultural well-being of Pembrokeshire with its vision as follows:

“to unlock the power and potential of Pembrokeshire's people and communities so that they are happy, healthy and live well, our communities are kind, safe, resourceful and vibrant, our economy is green and thriving, and our environment is protected and enhanced.”

3.4.2 **The Corporate Plan** sets out a high level strategy, identifying the four priority areas of Conservation, Connection, Communities and Climate and sets a vision for the National Park over a shorter time period than the Local Development Plan. The vision is expressed as:

“A National Park where nature, culture and communities thrive.”

3.4.3 **The Partnership Plan** sets out the purposes of the National Park, the action to be taken over the next five years, the partners involved and the measures of success. The Partnership Plan vision is:

“To ensure a vibrant, sustainable future for the environment and for those who live, work and visit the National Park.”

3.4.4 The adopted LDP2 vision acknowledges that in order to respect, and where possible, enhance the special qualities of the National Park, opportunities for development are limited and the Park’s population will not be able to increase significantly. Those opportunities are made available for development that contributes the most to sustaining local communities where they are compatible with the statutory National Park purposes. This vision has been reviewed to ensure that those elements that remain sound are retained and/or refined where necessary for LDP3, ensuring a clear and concise spatial element that identifies what makes the Pembrokeshire Coast National Park unique.

3.5 The Draft Vision

3.5.1 The following Draft Vision for LDP3 having regard to the above Plans and the identified issues as set out in section 2 of this paper is considered to provide a positive, aspirational statement that expresses the direction of LDP3 in land use planning terms.

By 2040, the Pembrokeshire Coast National Park will be internationally recognised for its thriving nature and communities, enabled through the conservation and enhancement of its landscapes, seascapes and unique special qualities. This will be exemplified by our commitment to nature recovery, climate resilience and sustainable placemaking, which are the foundational principles of all development.

- The National Park will be achieving measurable benefits for biodiversity and will be leading efforts to obtain net-zero carbon status by 2050.
- Residents and visitors will be able to access nature, culture and heritage through active travel and sustainable transport, using and celebrating the Welsh language, and will have improved physical and mental health and well-being.
- The National Park will be enabling age balanced coastal and rural communities through the provision of diverse, sustainable and resilient economic opportunities, high quality housing, including affordable housing and facilities that meet local needs.

4. Local Development Plan 3 Draft Objectives











4.1.1 In order to address the issues and deliver the Vision for the National Park, a set of objectives is required. The 16 draft objectives are in conformity with Future Wales: The National Plan 2040, take account of national planning policy and the Pembrokeshire Coast National Park Partnership Plan and identify what should be the key outcomes, relating to land use planning matters, that the Authority anticipates will be achieved during the Plan period.

4.1.2 In compliance with the Development Plans Manual (Edition 3), the plan's objectives should be focussed statements which seek to address the main social, environmental, economic and cultural well-being issues identified in the area, demonstrate delivery of the National Sustainable Placemaking Outcomes and align with the well-being goals of the Well-being of Future Generations (Wales) Act 2015, as well as providing a clear link to the vision.

4.1.3 In line with the key issues, the draft objectives have been grouped under the four groups of: Conservation; Connection and Cultural Heritage; Communities; and Climate and Natural Resources and in alignment with the seven well-being goals as set out in the Well-being of Future Generations (Wales) Act 2015.





4.1.4 The draft objectives are set within the context of needing to achieve the National Park purposes.

Table 2: Draft Objectives

 CONSERVATION: Conserve and enhance landscapes, seascapes, natural beauty and wildlife			
LDP 3 Objective Number	Objective	Link to identified issues	Link to 4Cs
1	To conserve and enhance the landscape and seascape character and special qualities of the National Park.	All	  
2	To conserve, enhance and manage the National Park's outstanding natural environment, rich species and habitat diversity and their connectivity to ensure their resilience to climate change whilst providing wider social, economic and health and well-being benefits.	1, 2, 3, 4, 5, 8, 14, 18, 19, 21, 23, 24	  
3	To conserve, enhance and promote the National Park's special qualities of dark skies, soundscapes and tranquillity, maximising socio-economic benefits, contributing to well-being and adapting to climate change.	1, 2, 4, 5, 6, 8, 14, 20, 21, 24	  








CONNECTION AND CULTURAL HERITAGE: Conserve and enhance cultural heritage, Welsh language and enhance equitable access to the National Park

LDP 3 Objective Number	Objective	Link to identified issues	Link to 4Cs
4	To create inclusive, accessible and sustainable places that enable people to access services, facilities, open space, nature, community and cultural facilities and high-quality housing to reduce inequality.	5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 24	
5	To promote sustainable access that seeks to reduce car dependency and the need to travel, providing opportunities for improved active travel and public transport options for residents and visitors.	1, 4, 5, 6, 9, 13, 14, 15, 16, 21, 24	
6	To identify opportunities to promote the use of the Welsh language and to safeguard and enhance local cultures, Pembrokeshire dialects and Welsh language-sensitive areas.	1, 3, 4, 7, 8, 10, 11, 14, 15, 16	
7	To conserve, enhance and promote the historic, cultural, heritage and built environment of the National Park, maximising the wider benefits to health and well-being and the economy.	1, 3, 4, 5, 7, 8, 14, 16	










COMMUNITIES: Foster the socio-economic well-being of National Park communities

LDP 3 Objective Number	Objective	Link to identified issues	Link to 4Cs
8	To maximise the delivery of appropriate housing, including affordable housing, to meet the identified need in sustainable, well-connected places that do not compromise National Park purposes.	1, 2, 3, 4, 5, 6, 7, 9, 10, 11, 12, 13, 14, 24	
9	To increase opportunities for the younger population to live and work in the National Park, including consideration of the impact of second homes, and to provide opportunities for the delivery of homes suitable and accessible for an ageing population resulting in more balanced and sustainable communities.	1, 2, 5, 7, 9, 10, 11, 13, 14, 15, 24	
10	To ensure the design of all development in the National Park reflects its special landscape and townscape qualities and local distinctiveness, meets the highest standards for resource use including minimising waste, and takes account of the impact of a changing climate.	1, 2, 3, 4, 5, 8, 10, 11, 14, 16, 18, 21, 24	
11	To promote and enhance opportunities for regenerative tourism which supports the economic well-being and sustainability of National Park communities, including balancing the demand for holiday lets, whilst seeking opportunities to actively restore the National Park's landscape, biodiversity and cultural heritage.	1, 2, 3, 4, 5, 7, 8, 11, 14, 16, 18, 21, 24	
12	To sustain and enhance the National Park's retail centres as vibrant, viable and multi functional centres that serve the needs of locals and visitors whilst remaining flexible for future changes.	1, 4, 6, 14, 15, 17	



CLIMATE AND NATURAL RESOURCES: Reduce and adapt to the impacts of climate change and manage natural resources sustainably

LDP 3 Objective Number	Objective	Link to identified issues	Link to 4Cs
13	To safeguard and enhance the natural resources, air, water and soil quality (including Best and Most Versatile agricultural land) in the National Park and to minimise the creation of new sources of pollution and contamination, recognising there are limited opportunities for brownfield development.	1, 2, 3, 4, 10, 15, 16, 18, 20, 21, 22, 24	 
14	To ensure new, highly vulnerable development does not take place in locations that are at risk of flooding or that may increase the risk of flooding in another location, and to ensure that development is sustainably designed to provide drainage and flood management where appropriate.	1, 2, 5, 10, 14, 15, 16, 18, 19, 21	 
15	To promote opportunities for energy conservation and efficiency, the use of renewable and low carbon energy to reduce carbon emissions, meet national targets and decarbonising travel to adapt to climate change and support the transition to net zero.	1, 3, 4, 5, 6, 10, 14, 18, 20, 21, 24	 
16	To safeguard the National Park’s mineral resource whilst ensuring no new mineral workings or extensions to existing mineral workings other than in exceptional circumstances.	1, 2, 4, 5, 14, 21, 23, 24	

Appendices

Appendix 1: Local Development Plan 3 Draft Objectives

Objective number	Local Development Plan 3 Objective
1	Landscapes, seascapes and special qualities
2	Natural environment and connectivity
3	Dark skies, soundscapes and tranquillity
4	Inclusive, accessible and sustainable places
5	Improved public transport and active travel
6	Safeguard and promote Welsh language and cultures
7	Conserve and enhance historic heritage and culture
8	Maximise delivery of affordable homes
9	Balanced age communities
10	Design of development
11	Regenerative tourism opportunities
12	Sustain and enhance retail centres
13	Safeguard and enhance natural resources
14	Flooding
15	Energy conservation and renewable energy
16	Safeguarding the mineral resource

Appendix 2: Review of LDP3 Draft Objectives against the Well-being of Future Generations (Wales) Act 2015 Well-being objectives

	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
Objective							
1	•	•	•				•
2	•	•	•				•
3	•	•	•			•	•
4		•	•	•	•	•	
5		•	•	•	•	•	
6		•	•	•	•	•	
7		•	•	•	•	•	
8	•		•	•	•	•	
9	•		•	•	•	•	
10	•		•	•	•	•	
11	•		•	•	•	•	
12	•		•	•	•	•	
13	•	•					•
14	•	•					•
15	•	•					•
16	•	•					•



Well-being goal	Description of the goal
A prosperous Wales	An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing fair work
A Resilient Wales	A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).
A Healthier Wales	A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.
A More Equal Wales	A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio-economic background and circumstances).
A Wales of Cohesive Communities	Attractive, viable, safe and well-connected communities
A Wales of Vibrant Culture and Thriving Welsh Language	A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.
A Globally Responsible Wales	A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.

Appendix 3: Review of LDP3 draft objectives against the Future Wales 2040 Outcomes

A Wales where people live											
	.. and work in connected, inclusive and healthy places	..in vibrant rural places with access to homes, jobs and services	..in distinctive regions that tackle health and socio-economic inequality through sustainable growth	..in places with a thriving Welsh language	..and work in towns and cities which are a focus and springboard for sustainable growth	..in places where prosperity, innovation and culture are promoted	..in places where travel is sustainable	..in places with world-class digital infrastructure	..in places that sustainably manage their natural resources and reduce pollution	..in places with biodiverse, resilient and connected ecosystems	..in places which are decarbonised and climate-resilient
Objective											
1	•	•	•	•	•	•	•	•	•	•	•
2	•		•						•	•	•
3	•			•	•				•	•	•
4	•	•	•		•		•			•	•
5	•	•	•				•				•
6	•	•	•	•		•					
7	•	•	•	•		•					
8	•	•	•	•	•	•	•	•		•	•
9	•	•	•	•	•	•	•	•			
10	•	•	•		•		•	•	•	•	•
11		•	•	•	•	•	•	•	•	•	•
12	•	•	•		•	•	•	•			
13	•				•				•	•	•
14							•		•	•	•
15	•		•		•		•	•	•	•	•
16			•						•	•	•

Appendix 4: Review of LDP3 draft objectives against the National Sustainable Placemaking Outcomes in Planning Policy Wales

	Creating and Sustaining Communities	Growing Our Economy in a Sustainable Manner	Making Best Use of resources	Maximising Environmental Protection and Limiting Environmental Impact	Facilitating Accessible and Healthy Environments
Objective					
1	•	•	•	•	•
2	•	•	•	•	•
3	•		•	•	•
4	•	•	•	•	•
5	•	•		•	•
6	•			•	
7	•			•	•
8	•	•	•	•	•
9	•	•			•
10	•	•	•	•	•
11	•	•		•	•
12	•	•		•	•
13			•	•	•
14	•		•	•	•
15		•	•	•	•
16		•	•	•	

Appendix 5: Review of LDP3 draft objectives against the Pembrokeshire Well-being Plan Objectives

	Support growth, jobs and prosperity and enable the transition to a more sustainable and greener economy	Work with our communities to reduce inequalities and improve well-being	Promote and support initiatives to deliver decarbonisation, manage climate adaptation and tackle the nature emergency	Enable safe, connected, resourceful and diverse communities
Objective				
1	•	•	•	•
2		•	•	•
3		•	•	•
4	•	•	•	•
5	•	•	•	•
6		•		•
7		•		•
8	•	•	•	•
9	•	•		•
10	•		•	
11	•	•	•	•
12	•			•
13	•		•	
14			•	•
15	•		•	
16	•		•	

Appendix 6: Review of LDP3 draft objectives against the Natural Resources Wales (NRW) South West Wales Area Statements

Objective	Reducing health inequalities	Ensuring sustainable land management	Reversing the decline of, and enhancing, biodiversity	Mitigating and adapting to a changing climate
1	•	•	•	•
2	•	•	•	•
3	•	•	•	•
4	•			•
5	•			
6				
7	•			
8	•	•	•	•
9	•	•		
10	•	•	•	•
11	•			
12				•
13	•	•	•	•
14	•	•	•	•
15	•	•	•	•
16	•	•	•	•