

## Report of Strategic Policy Manager

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**Subject: Agreement to undertake public consultation on key preparatory documents for the replacement Local Development Plan 3**

**Decision Required: Yes**

**Recommendation:**

The Authority is recommended to agree:

- Public consultation on the Sustainability Appraisal incorporating the Strategic Environmental Assessment Scoping Report (Appendix A), including appendices on the Review of Relevant Plans, Policies and Programmes and Baseline Information.
- Public consultation on the Draft Issues, Vision and Objectives Paper (Appendix B)
- An amendment to the end date of the Local Development Plan 3 (LDP 3) from the end of 2039 to 31 March 2040. This amendment requires a consequential revision to the Delivery Agreement.

The Authority is to note that officers will also be undertaking a call for the submission of candidate sites, commencing in January.

### 1. Key messages

This report is to seek agreement from Members to undertake 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).

The Delivery Agreement for LDP 3 identified a 15-year plan period from 2025 to the end of 2039. It is proposed to amend the 15-year timescale to 1 April 2025 to 31 March 2040 to align with the annual monitoring period. This amendment will require consequential amendments to the Delivery Agreement and accompanying integrated impact assessment which considers the potential impacts of the Delivery Agreement regarding Equality, Socio-Economic Duty, Welsh Language Standards, Biodiversity Duty and the Well-Being of Future Generations Act.

### 2. Background

The following documents are proposed for public engagement and consultation:

## **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.

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 propose an eight-week public consultation period on the Scoping Report commencing in January 2026.

## **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.

## **Amendment to LDP 3 timeframe**

It is proposed that the 15-year timeframe for LDP 3 is amended to align with the annual monitoring period. This amendment will result in consequential updates to the Delivery Agreement and the website. The proposed change is minor and, at this stage in the process, will not affect any interested parties. Therefore, consultation is not required. Officers will notify all individuals registered on the LDP 3 Contact List of the revised plan period and the corresponding amendment to the Delivery

Agreement prior to the commencement of consultation on the SA/SEA Scoping Report and the Draft Issues, Vision and Objectives Paper.

### **Call for Candidate Sites**

Officers will undertake a call for candidate sites over a three-month period, commencing in January. The process will invite landowners, developers and agents to submit land for consideration in LDP 3. All sites received will be recorded on a Candidate Sites Register and assessed against planning policy, environmental constraints, infrastructure capacity and deliverability, which is set out in a methodology paper.

### **3. Consultation**

A public consultation is proposed for an eight-week period commencing in January 2026 on the SA/SEA Scoping Report and Draft Issues, Vision and Objectives Paper. An email or letter will be circulated to:

- NPA Members
- Town, City and Community Councils
- Councillors covering the National Park
- Members of the public, businesses and organisations who are registered on the LDP 3 Contact List
- Specific Consultation Bodies, General Consultation Bodies and other consultees (listed in Appendix 4 of the Delivery Agreement)
- Developers, landowners, agents registered on the LDP 3 Contact list

The documents will be available to download from the Authority's website and will be available to view online at local libraries. An online workshop will be held for local Councillors and City, Town and Community Councils and meetings will be held with key stakeholders, as required.

The Call for Candidate Sites will be advertised by a press release and the use of social media. Officers will also obtain quotes for placing an advert in the local press and distribute posters to Town and Community Councils to display in their local area. A workshop will be held online for any interested parties, particularly aimed at landowners, agents, Registered Social Landlords and Town, City and Community Councils.

### **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.

The SA/SEA Scoping Report and Draft Issues, Vision and Objectives Paper has been informed by a review of relevant plans, policies and programmes and baseline information which form the appendices to the SA/SEA Scoping Report. The issues are aligned under the four themes identified in the Corporate Plan and Partnership Plan.

## **5. Financial Considerations**

The documents have been prepared by the Strategic Policy team and engagement and consultation will be 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. One test is: Does the plan fit? and is it clear that the LDP is 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 Draft Issues, Vision and Objectives Paper.

## **7. Impact on our Public Sector Duties**

**7.1 Integrated Impact Assessment Completed:** Yes, but only in relation to the update to the Delivery Agreement. 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**

An Integrated Impact Assessment was completed for the draft Delivery Agreement and updated for the final Delivery Agreement and has been revised to take into account the proposed change regarding the timeframe. The Public Equality Duty requires the Authority to have due regard to the need to eliminate discrimination, promote equality of opportunity and foster good relation between different communities. This means that, in the formative stages of our policies, procedure, practice or guidelines, the Authority needs to take into account what impact its decisions will have on people who are protected under the Equality Act 2010 (people who share a protected characteristic of age, sex, race, disability, sexual orientation, gender reassignment, pregnancy and maternity, and religion or belief). The proposed change to the timeframe is minor in nature and extends the end date of LDP 3 by three months from 31 December 2039 to 31 March 2040. The IIA identified through the equality assessment that there would be no adverse impact on the protected groups.

In relation to the draft 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 will exceed 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.

A Welsh Language Impact Assessment will be undertaken in accordance with the Welsh Language (Wales) Measure 2011 and The Welsh Language Standards Regulations (No.1) 2015 to assess LDP 3, to increase positive effects and decrease adverse effects on the Welsh language and opportunities for persons 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.

All consultation documents will be made available bilingually.

#### **7.4 Biodiversity Duty and Decarbonisation**

The Environment (Wales) Act 2016 introduced an enhanced biodiversity and resilience of ecosystems duty (Section 6 Duty). This duty applies to public authorities in the exercise of their functions and will help maximise contributions to achieving the well-being goals. Planning authorities must seek to maintain and enhance biodiversity in the exercise of their functions. As identified by Planning Policy Wales, the development of green infrastructure is an important way for local authorities to deliver their Section 6 duty.

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 Draft 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).

#### **7.5 Well-being of Future Generations (Wales) Act**

The SA/SEA Scoping Report (paragraphs 5.7 to 5.12), the Draft Issues, Vision and Objectives Paper (appendix 2 and 3) and the Delivery Agreement (paragraphs 1.2.5 and 1.2.6) 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

The Authority is recommended to agree to public consultation on the SA/SEA Scoping Report and the Draft Issues, Vision and Objectives Paper, as well as to amend the end date of LDP 3 to 31 March 2040, with a corresponding update to the Delivery Agreement. The Authority is also asked to note that officers will launch a call for Candidate Site submissions starting in January.

## 9. Background Documentation

- Sustainability Appraisal incorporating the Strategic Environmental Assessment Scoping Report ([Appendix A](#)) including appendices on the Review of Relevant Plans, Policies and Programmes and Baseline Information.
- Draft Issues, Vision and Objectives paper ([Appendix B](#))
- [Delivery Agreement \(Version 2\)](#) and [Integrated Impact Assessment](#)

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Pembrokeshire Coast National Park Authority

## **LOCAL DEVELOPMENT PLAN 3**

(1 April 2025 –31 March 2040)

Sustainability Appraisal (incorporating Strategic  
Environmental Assessment)

Scoping Report

Consultation Draft: January 2026



Parc Cenedlaethol  
Arfordir Penfro  
Pembrokeshire Coast  
National Park

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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 Guidance<sup>1</sup> 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”<sup>2</sup>.

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

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

## Process

### 1.5 Components of the Sustainability Appraisal:

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

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

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

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

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

## Habitats Regulations Assessment

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

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

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

## Welsh Language

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

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

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

## Equality, Socio Economic, Health and Human Rights Impact Assessment

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

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

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

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

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

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

## Section 2.0 Relevant Plans, Policies and Programmes

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

### International

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

### EU Directives (key ones):

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

### United Kingdom

- [Environment Act 1995](#) – Defines National Park purposes and socio-economic duty.



- [Wildlife and Countryside Act 1981 \(as amended\)](#) – Core wildlife protection legislation.
- [Conservation of Habitats and Species Regulations 2017](#) – Habitats Regulation Assessment requirement.
- [Flood and Water Management Act 2010](#) – Flood risk and sustainable drainage.
- [Evidence for UK Climate Change Risk Assessment \(CCRA3\) Summary for Wales \(2022\)](#) – Climate risk priorities.
- – Strengthening protected area management. [JNCC Joint Statement on Protected Areas \(2024\)](#)

## Wales

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

## Regional

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

## Local

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

## Section 3.0: Baseline Information

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

### Data limitations

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

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

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

## Section 4.0: Identification of Sustainability Issues

4.1 The following resources were used to identify Sustainability Issues:

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

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

### Issue 1: Effects of Climate Change

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

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

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

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

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

## Issue 3: Landscape sensitivity to development

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

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

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

## Issue 4: Dependence on private cars

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

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

## Issue 5: Protection of the physical environment

Natural resources, such as air quality, water supply and quality and soil quality need to be protected. Air quality in the National Park is generally high though there are pollution hotspots related to road traffic. River quality is generally moderate, though a number of the National Park's rivers and its coastal waters are classed as at risk or probably at risk (from diffuse and/or point source pollution; physical alteration; and/or alien species) by Natural Resources Wales under the Water Framework Directive. Additionally, in some areas of Pembrokeshire national modelling (APIS) shows that atmospheric ammonia concentration exceeds the critical level (1ug/m<sup>3</sup> annual average concentration) for lichens and bryophytes and is therefore highly likely to be causing damage to the special features of protected sites and ancient woodlands in those areas.

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

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

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

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

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

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

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

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

## Issue 6: Reconciling energy development with landscape considerations



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

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

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

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

An agricultural ammonia emissions attribution map (for National Network Sites receptors) – shows medium and high emission densities from the cattle sector in Pembrokeshire<sup>3</sup>.

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<sup>3</sup> 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

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

## Issue 8: The future of the built environment

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

## Issue 9: The use and condition of the marine environment

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

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

## Issue 10: Domestic and commercial resource use

This issue covers energy and water use, and the generation of waste, in domestic and commercial activities. It also covers resource exploitation activity such as quarrying. Use of resources is inevitable for economic and social

development and the general well-being of the population. However, unsustainable and inefficient resource use impacts on the physical environment in terms of pollution, strain on ecosystems and landscape degradation.

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

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

### **Issue 12: Maintain and enhance important biological resources**

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

### **Issue 13: Important geological resources**

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

### **Issue 14: Important landscape resources**

Designation as a National Park is primarily due to the importance of the landscape. National Parks in the UK are classified by the International Union for

the Conservation of Nature as Category 5: Protected Landscapes. These are defined as an 'area of land, with coast and sea as appropriate, where the interaction of people and nature over time has produced an area of distinct character with significant aesthetic, ecological and/or cultural value, and often with high biological diversity. Safeguarding the integrity of this traditional interaction is vital to the protection, maintenance and evolution of such an area.'<sup>4</sup>

## 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

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<sup>4</sup> 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%<sup>5</sup>) 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 Amroth<sup>6</sup>.

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

## Issue 19: Military use of the National Park

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

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

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

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

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<sup>5</sup> Based on Census 2011 "Households with no usual resident"

<sup>6</sup> 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.

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



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

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

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

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

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

## Compatibility of objectives and National Park purposes

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

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

In pursuing these purposes National Park authorities shall:

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

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

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

✓ 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 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 goals<sup>7</sup> 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.

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<sup>7</sup> 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	✓

5.9 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.

## 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	x	x	✓	x	✓	-	✓	

development 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)	✓	✓	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; x 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



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 engagement 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.

## 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

 <b>CONSERVATION:</b> 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><b>Conservation of Landscape and Seascape and National Park Special Qualities:</b></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"> <li>• <a href="#">PCNPA Partnership Plan</a></li> <li>• <a href="#">Celtic Freeport</a></li> <li>• <a href="#">South West Wales Regional Energy Strategy (SWW CJC) 2022</a></li> <li>• <a href="#">Pembrokeshire's Local Area Energy Plan (LAEP) 2022</a></li> <li>• <a href="#">Welsh National Marine Plan (WNMP) 2019</a></li> </ul>	<ul style="list-style-type: none"> <li>• Strategic policy to conserve and enhance the special qualities of the National Park (Sandford Principle).</li> <li>• Specific landscape and seascape policies.</li> <li>• Direct development to the most sustainable locations within the National Park, in line with the Settlement Hierarchy.</li> <li>• 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.</li> </ul>

2	<p><b>Conservation and enhancement of biodiversity and habitat connectivity:</b></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"> <li>• <a href="#">Planning Policy Wales (PPW) Edition 12</a></li> <li>• <a href="#">Biodiversity Deep Dive</a></li> <li>• <a href="#">South West Wales Area Statement - NRW</a></li> <li>• <a href="#">Nature Network Maps – NRW</a></li> <li>• <a href="#">State of Natural Resources Report (SoNaRR) for Wales 2020</a></li> <li>• <a href="#">Pembrokeshire Nature Partnership</a></li> <li>• <a href="#">Pembrokeshire wellbeing Plan</a></li> <li>• <a href="#">Nature Recovery Action Plan for Pembrokeshire (2018)</a></li> <li>• <a href="#">Local Biodiversity Action Plan for Pembrokeshire</a></li> </ul>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Ensure new development delivers net benefit for biodiversity including space for green corridors, SuDS, tree planting, or habitat buffers.</li> <li>• 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.</li> <li>• 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).</li> <li>• Policy to conserve and enhance locally designated sites.</li> </ul>
3	<p><b>Conservation and enhancement of dark skies:</b></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"> <li>• <a href="#">Planning for the Conservation and Enhancement of Dark Skies in Wales Good Practice Guidance</a></li> <li>• <a href="#">Planning Policy Wales (PPW) Edition 12</a></li> <li>• <a href="#">NRW/LUC Dark Skies and Light Pollution Mapping</a></li> <li>• <a href="#">PCNPA Partnership Plan 2025-2029</a></li> </ul>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Identification of areas where improvements of poor lighting can be addressed by retrofitting.</li> <li>• Specific policies to address the impacts of lighting on wildlife species and habitats, cross cutting with GI delivery.</li> <li>• Cross-cutting with climate change and adaptation.</li> </ul>

	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><b>Conservation and enhancement of soundscapes and tranquillity:</b></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 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"> <li>• <a href="#">PCNPA Partnership Plan 2025-2029</a></li> <li>• <a href="#">NRW Tranquillity mapping.</a></li> <li>• <a href="#">Welsh Government Noise and Soundscape Plan for Wales 2023-2028</a></li> </ul>	<ul style="list-style-type: none"> <li>• Ensure new development is directed to the most sustainable locations to minimise the impact on soundscapes and tranquillity.</li> <li>• 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.</li> </ul>



**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?
<b>Well-being</b>			
5	<p><b>Promotion of physical and mental health and well-being:</b></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"><li>• <a href="#">Well-Being Plan for Pembrokeshire</a></li><li>• <a href="#">A Healthier Wales: our Plan for Health and Social Care (2021)</a></li><li>• <a href="#">Healthy Weight Healthy Wales</a></li></ul>	<ul style="list-style-type: none"><li>• Ensure housing, employment, services and facilities are provided in locations accessible by active travel methods and public transport.</li><li>• Ensure quality, well designed places, that includes housing which is affordable, accessible, and appropriate for the local needs.</li><li>• Provide opportunities to access play, recreation and open spaces.</li><li>• Support the provision of green and blue infrastructure.</li></ul>
6	<p><b>Provision of sustainable transport and access to services:</b></p> <p>The National Park is a predominately rural area with a dispersed, ageing population who are reliant on the private car. There is significant visitor traffic in the summer which places a strain on the designated landscape. There are limited and unreliable public transport options for residents and</p>	<ul style="list-style-type: none"><li>• <a href="#">Future Wales: The National Plan 2040</a></li><li>• <a href="#">Planning Policy Wales (PPW) Edition 12</a></li><li>• <a href="#">Llwybr Newydd: the Wales Transport Strategy (2021)</a></li></ul>	<ul style="list-style-type: none"><li>• Direct development to most sustainable locations with access to services and facilities by sustainable modes of travel</li><li>• 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</li></ul>

	visitors (infrequent buses and slow rail) which presents a barrier for some in accessing the Park and local services.	<ul style="list-style-type: none"> <li>• <a href="#">National Transport Delivery Plan 2022 to 2027</a></li> <li>• <a href="#">Active Travel Guidance (2021)</a></li> <li>• <a href="#">South West Wales Regional Transport Plan 2025-2030</a></li> <li>• <a href="#">Clean Air Plan for Wales: Healthy Air, Healthy Wales (2020)</a></li> <li>• <a href="#">South West Wales Energy Strategy (2022)</a></li> </ul>	<p>emissions vehicles in appropriate locations. These measures will also support physical and mental health, reduce inequalities and contribute to net zero by decarbonising travel.</p> <ul style="list-style-type: none"> <li>• Protect community facilities to ensure equitable access.</li> </ul>
<b>Welsh Language, Culture and Heritage</b>			
7	<p><b>Protection and promotion of Welsh language, local dialects and culture:</b></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"> <li>• <a href="#">Commission for Welsh-speaking Communities   GOV.WALES</a></li> <li>• <a href="#">Welsh Language (Wales) Measure 2011</a></li> <li>• <a href="#">Cymraeg 2050: A Million Welsh Speakers</a></li> </ul>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Identify Welsh Language Sensitive Areas where the language is sensitive or significant.</li> <li>• Identify locations / communities where opportunities to promote the Welsh language, culture and local dialects can be safeguarded and enhanced.</li> <li>• Cross-cutting links with the provision of housing, including affordable homes, second homes and holiday lets and employment opportunities.</li> <li>• Policy to require the assessment of large windfall developments within identified Welsh Language-Sensitive Areas.</li> </ul>

8	<p><b>Conservation and enhancement of landscapes of historic interest, Conservation Areas, historic buildings and their settings:</b></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"> <li>• <a href="#">Historic Environment (Wales) Act 2023</a></li> </ul>	<ul style="list-style-type: none"> <li>• Ensure development conserves and enhances heritage assets including listed buildings, conservation areas, scheduled monuments and historic parks and gardens and their settings.</li> <li>• Policies to conserve, enhance and promote opportunities to enjoy the historic environment, local character and cultural identity of the National Park.</li> </ul>
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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?
<b>Social</b>			
9	<b>De-population, ageing population and outmigration of young people:</b>  The population of the 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.	<ul style="list-style-type: none"><li>• <a href="#">Household projections for National Parks, 2018 based</a></li><li>• <a href="#">Age friendly Wales: our strategy for an ageing society (Welsh Government)</a></li><li>• <a href="#">Pembrokeshire Local Housing Market Assessment 2023</a></li><li>• <a href="#">Pembrokeshire Local Housing Strategy 2024-2029</a></li></ul>	<ul style="list-style-type: none"><li>• Consider and analyse a range of growth options to assess how growth options impact on the age profile of the National Park.</li><li>• Identify a suitable housing target and identify suitable and deliverable sites for housing, taking account of the designated landscape of the National Park.</li><li>• 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.</li><li>• Facilitate the delivery of homes suitable and accessible for an ageing population.</li><li>• 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.</li><li>• Assess the need for specialised housing, including sheltered and extra care housing.</li></ul>
10	<b>High level of need for affordable housing:</b>  The Local Housing Market Assessment 2025 identifies a high level of unmet affordable housing need with over 5,000 households on the	<ul style="list-style-type: none"><li>• <a href="#">Household projections for National Parks, 2018 based</a></li><li>• <a href="#">Pembrokeshire Local Housing Market Assessment 2023</a></li></ul>	<ul style="list-style-type: none"><li>• Examine the viability of development to maximise affordable housing delivery through section 106 agreements.</li><li>• 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,</li></ul>

	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.	<ul style="list-style-type: none"> <li>• <a href="#">Pembrokeshire Local Housing Strategy 2024-2029</a></li> <li>• <a href="#">Welsh Development Quality Requirements WDQR) 2021</a></li> </ul>	<p>including affordable housing led schemes, including schemes delivered using social housing grant.</p> <ul style="list-style-type: none"> <li>• Develop policies to ensure housing is appropriate in size, tenure and location to meet the identified need.</li> <li>• Include a policy to support affordable housing exception sites.</li> <li>• Has cross-cutting links with the protection and promotion of Welsh language and culture.</li> </ul>
11	<p><b>High numbers of second homes and holiday lets:</b></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"> <li>• <a href="#">Planning Policy Wales (PPW) Edition 12</a></li> <li>• <a href="#">The Town and Country Planning (Use Classes) (Amendment) (Wales) Order 2022</a></li> <li>• <a href="#">Pembrokeshire Local Housing Market Assessment 2023</a></li> <li>• <a href="#">Second homes: Developing new policies in Wales (2021)</a></li> </ul>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> </ul>
12	<p><b>Meeting the need of the Gypsy, Travellers and Showpeople population:</b></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</p>	<ul style="list-style-type: none"> <li>• <a href="#">Pembrokeshire Gypsy and Traveller Accommodation Assessment 2019</a></li> <li>• <a href="#">Welsh Government Gypsy and Traveller Caravan Count</a></li> </ul>	<ul style="list-style-type: none"> <li>• Include a criteria based policy to assess planning applications for the development of sites in appropriate locations for Gypsies, Travellers and Showpeople.</li> </ul>



	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.		
13	<b>Poverty and inequality (especially childhood poverty)</b>  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.	<ul style="list-style-type: none"> <li>• <a href="#">Well-being plan for Pembrokeshire</a></li> <li>• <a href="#">Tackling Poverty: Our Strategy 2023 (Pembrokeshire Public Services Board)</a></li> <li>• <a href="#">PCNPA Partnership Plan (2025-2029)</a></li> </ul>	<ul style="list-style-type: none"> <li>• Facilitate the delivery of suitable housing, including affordable housing to meet the identified needs of the population</li> <li>• Provide opportunities to support the delivery of well-paid employment opportunities</li> <li>• Promote active travel opportunities throughout towns and villages, which will also support physical and mental health and reduce inequalities.</li> <li>• Ensure housing, employment, services and facilities are provided in locations accessible by active travel methods and public transport.</li> <li>• 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.</li> </ul>
14	<b>Placemaking and sustainable design</b>  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	<ul style="list-style-type: none"> <li>• <a href="#">Wales Placemaking charter (2020)</a></li> <li>• <a href="#">Welsh Development Quality Requirements (WDQR) 2021</a></li> <li>• <a href="#">Future Wales: The National Plan 2040</a></li> <li>• <a href="#">Planning Policy Wales (PPW) Edition 12</a></li> </ul>	<ul style="list-style-type: none"> <li>• Work in combination with other identified issues such as the nature and climate emergencies, community cohesion, health and wellbeing, accessibility, and transport.</li> <li>• 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 Lifetime Homes Standards</li> </ul>

	threatening the Park's natural, cultural, and built heritage and limiting opportunities for positive placemaking and resilient communities.	<ul style="list-style-type: none"> <li>• <a href="#">TAN 12: Design</a></li> <li>• <a href="#">Net Zero Wales 2021-2025</a></li> <li>• <a href="#">Pembrokeshire Local Housing Strategy 2024-2029</a></li> </ul>	<ul style="list-style-type: none"> <li>• 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</li> <li>• Consider a replacement dwelling policy to enable consideration of embedded carbon in existing dwellings</li> <li>• Encourage the sensitive retrofitting of existing buildings (insulation, renewables, heat pumps) while respecting character, heritage, and landscape qualities.</li> <li>• Promote nature-based solutions, such as SuDS, green infrastructure, and carbon-sequestering practices that also enhance place quality.</li> </ul>
<b>Economic</b>			
15	<p><b>Employment opportunities – fair work, seasonal, low paid etc.</b></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, low numbers of working age individuals and lack of brownfield development sites is limiting opportunities for employment growth.</p>	<ul style="list-style-type: none"> <li>• <a href="#">South West Wales Regional Economic Delivery Plan 2022</a></li> <li>• <a href="#">Celtic Freeport</a></li> <li>• <a href="#">PCNPA Partnership Plan (2025-2029)</a></li> </ul>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Collaboration with Pembrokeshire County Council to encourage future development of land adjacent to regional growth areas to deliver economic growth throughout the region and support high quality jobs (Celtic Freeport).</li> <li>• Facilitate opportunities for green energy jobs</li> <li>• Facilitate the delivery of improved rural broadband and high speed internet connections to address digital exclusion in rural areas</li> <li>• Facilitate employment accessibility and promote active travel reducing the need to travel to work by private car.</li> <li>• Has cross-cutting links with de-population, ageing population and outmigration of young people and</li> </ul>

			the protection and promotion of Welsh language and culture.
16	<p><b>Balancing the competing demands of tourism against the protection of the National Park's special qualities and its communities</b></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. 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"> <li>• <a href="#">Economic Impact of Tourism in Pembrokeshire 2024</a></li> <li>• <a href="#">Pembrokeshire Destination Management Plan</a></li> <li>• <a href="#">Article 4(1) Direction for 28-day sites for camping, caravans and mobile homes</a></li> </ul>	<ul style="list-style-type: none"> <li>• Promote tourism development to become more regenerative that actively restores or enhances the National Parks landscape, biodiversity, and cultural heritage – in combination with landscape &amp; seascapes policy.</li> <li>• Review the National Park's landscape and seascape sensitivity relating to new tourism development, especially new camping and caravanning development.</li> <li>• Facilitate the delivery of development to support year-round, off-peak tourism, to reduce seasonal pressures.</li> </ul>
17	<p><b>Retail and changing town centres</b></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"> <li>• <a href="#">Future Wales: The National Plan 2040</a></li> <li>• <a href="#">PPW12</a></li> <li>• <a href="#">Technical Advice Note (TAN) 4: Retail and Commercial Development</a></li> <li>• <a href="#">Together for Retail: Wales Retail Forum Action Plan (2023)</a></li> <li>• <a href="#">Welsh Government Town Centres First</a></li> </ul>	<ul style="list-style-type: none"> <li>• 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</li> <li>• 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.</li> </ul>

		<a href="#">Position Statement (2023)</a> <ul style="list-style-type: none"> <li>• <a href="#">LDP 2 Annual Monitoring Reports (Indicator 34 on retail vacancy rates)</a></li> </ul>	<ul style="list-style-type: none"> <li>• Consideration of upper-floor uses to maximise space efficiency and the viability and vitality of the National Park's retail centres.</li> </ul>
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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><b>Water Quality (riverine, marine, phosphates, nitrates, DIN)</b></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"><li>• <a href="#">The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017</a></li><li>• NRW Guidance: Nitrates &amp; Phosphates<ul style="list-style-type: none"><li>- <a href="#">Condition assessments for Welsh European marine sites (EMS)</a></li><li>- <a href="#">Conservation advice for European marine sites (Reg 37)</a></li><li>- <a href="#">Compliance Assessment of Welsh River SACs Against Water Quality Targets 2024</a></li></ul></li><li>• <a href="#">All Wales Nutrient Calculator</a></li><li>• <a href="#">Water Resources (Control of Agricultural Pollution) (Wales) 2021 Regulations</a></li><li>• <a href="#">Dŵr Cymru Welsh Water Asset Management Programme 8 2025-30 (AMP 8)</a></li></ul>	<ul style="list-style-type: none"><li>• Require new development in failing SAC catchments to demonstrate nutrient neutrality or improvement, supported by nutrient statements or budget calculations.</li><li>• Promote mitigation where nutrient loads increase, e.g., upgraded treatment works, improved agricultural practices, green infrastructure, constructed wetlands, or nutrient trading/offsetting.</li><li>• 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.</li></ul>

		<ul style="list-style-type: none"> <li>• <a href="#">Technical Advice Note 5: Nature Conservation and Planning</a></li> <li>• <a href="#">Planning Policy Wales (PPW) Edition 12</a></li> <li>• <a href="#">Future Wales 2040</a></li> </ul>	
19	<b>Flooding and Coastal Change</b>  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.	<ul style="list-style-type: none"> <li>• <a href="#">TAN15</a></li> <li>• <a href="#">Flood Maps for Planning NRW</a></li> <li>• <a href="#">Strategic Flood Consequences Assessment</a></li> <li>• <a href="#">South West Wales Area Statement - NRW</a></li> <li>• <a href="#">National Strategy for Flood and Coastal Erosion Risk Management in Wales (2020)</a></li> <li>• <a href="#">Climate Change (Wales) Regulations (2021)</a></li> <li>• <a href="#">Climate Adaptation Strategy for Wales (2024)</a></li> <li>• <a href="#">Welsh National Marine Plan (WNMP)</a></li> <li>• <a href="#">West of Wales Coastal Group</a></li> <li>• <a href="#">Swansea and Carmarthen Bay Coastal Engineering Group</a></li> </ul>	<ul style="list-style-type: none"> <li>• Direct development away from areas at risk from flooding</li> <li>• 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.</li> <li>• Require flood-resilient design, buffers, green infrastructure, escape routes, natural flood storage, raised floor levels for development in identified flood zones.</li> <li>• 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.</li> </ul>
20	<b>Renewable and low carbon energy:</b>  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	<ul style="list-style-type: none"> <li>• <a href="#">Future Wales 2040</a></li> <li>• <a href="#">Future Wales 2040</a></li> <li>• <a href="#">Review of Wales' Renewable Energy Targets: summary of responses</a></li> </ul>	<ul style="list-style-type: none"> <li>• Provision of a positive policy framework for renewable energy balanced against landscape / seascape and visual impacts.</li> <li>• Consider specific policies for domestic micro generation</li> </ul>

	increase of renewable energy infrastructure will need to be balanced against landscape and seascape character and special qualities considerations.	<ul style="list-style-type: none"> <li>• <a href="#">Renewable-Energy-Assessment-Updated-January-2016.pdf</a></li> <li>• <a href="#">Pembrokeshire's Local Area Energy Plan (LAEP) 2022</a></li> </ul>	<ul style="list-style-type: none"> <li>• Consider a policy for community owned renewable energy generation.</li> <li>• Policy framework and SPG guidance on Floating Offshore Wind generation (FLOW).</li> <li>• 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.</li> <li>• Cross-cutting with Best and Most Versatile Agricultural Land.</li> </ul>
21	<p><b>Climate change and adaptation</b></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"> <li>• <a href="#">Climate Adaptation Strategy for Wales (2024)</a></li> <li>• <a href="#">South West Wales Area Statement (Natural Resources Wales), 2020</a></li> <li>• <a href="#">Pembrokeshire Climate Adaptation Strategy (Public Services Board) 2022</a></li> <li>• <a href="#">PCNPA Partnership Plan (2025-2029)</a></li> </ul>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• Avoid locating development in areas at risk of flooding, coastal erosion, or other climate hazards.</li> </ul>

22	<b>Best and Most Versatile Agricultural Land</b> <p>A significant proportion of the National Park (45.6%) is Best and Most Versatile (BMV) agricultural land (Agricultural Land Classification Grades 1, 2,&amp; 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"> <li>• <a href="#">Predictive Agricultural Land Classification Map (Wales)</a></li> <li>• <a href="#">Future Wales 2040</a></li> <li>• <a href="#">PPW 12</a></li> <li>• <a href="#">PCNPA Partnership Plan (2025-2029)</a></li> </ul>	<ul style="list-style-type: none"> <li>• Include policies resisting development on BMV agricultural land unless overriding need is demonstrated with evidence.</li> <li>• Seek to maximize appropriate development on brownfield land and lower grade agricultural land</li> <li>• Require developers to provide site-specific Agricultural Land Classification surveys where development on potential BMV land is proposed.</li> <li>• Integrate BMV land protection with wider LDP objectives, such as: climate change resilience, nature recovery, and biodiversity net gain.</li> <li>• Consider the establishment of thresholds for when loss of BMV is acceptable - e.g. for overriding community, renewable energy, housing or infrastructure needs.</li> </ul>
23	<b>Minerals:</b> <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"> <li>• <a href="#">Future Wales 2040</a></li> <li>• <a href="#">Regional Technical Statement for North Wales and South Wales Regional Aggregate Working Parties, 2<sup>nd</sup> Review</a></li> <li>• <a href="#">Statement of Sub-regional Collaboration for the South West Wales Sub-Region on the Regional Technical Statement, 2<sup>nd</sup> Review</a></li> </ul>	<ul style="list-style-type: none"> <li>• Policies to ensure the safeguarding of mineral resources</li> <li>• Policy framework to ensure that there are no new mineral workings or extensions (unless exceptional circumstances) in the National Park.</li> <li>• Statement of Sub-regional Collaboration to ensure that the region can meet the requirements of the West Wales region.</li> <li>• 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.</li> </ul>
24	<b>Reduce carbon emissions / transition to net zero energy</b>	<ul style="list-style-type: none"> <li>• <a href="#">Pembrokeshire Local Housing Strategy 2024-2029</a></li> <li>• <a href="#">Welsh Government consultation on changes to</a></li> </ul>	<ul style="list-style-type: none"> <li>• Direct development to most sustainable locations with access to services and facilities by sustainable modes of travel</li> <li>• Promote the sustainable transport hierarchy (see Planning Policy Wales) to give priority to</li> </ul>



	<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>	<p><a href="#">Building Regulations Part L (conservation of fuel and power)</a></p> <ul style="list-style-type: none"> <li>• <a href="#">Net Zero Wales: Carbon Budget 2</a></li> <li>• <a href="#">South West Wales Energy Strategy (2022)</a></li> <li>• <a href="#">Heat Strategy for Wales (2024)</a></li> <li>• <a href="#">Pembrokeshire Climate Adaptation Strategy (Public Services Board) 2022</a></li> <li>• <a href="#">National Parks Net Zero Report, Small World Consulting</a></li> </ul>	<p>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.</p> <ul style="list-style-type: none"> <li>• Ensure new development delivers net benefit for biodiversity including space for green corridors, SuDS, tree planting, or habitat buffers.</li> <li>• Facilitate the provision of renewable energy in appropriate locations.</li> <li>• Consider the viability implications of policies to require net zero dwellings and buildings</li> </ul>
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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

 <b>CONSERVATION:</b> 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	•	•	•	•