



Habitats Regulations Assessment (HRA) of  
the Pembrokeshire Coast National Park  
Management Plan (A Partnership Plan for the  
National Park 2025-2029).

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Footprint Contract Reference: 796

Date: 30<sup>th</sup> May 2024

Version:

Recommended Citation: Liley, D. Rush, E. & Chapman, C. (2024). Habitats Regulations Assessment (HRA) of the Pembrokeshire Coast National Park Management Plan (A Partnership Plan for the National Park 2025-2029). Report by Footprint Ecology for the Pembrokeshire Coast National Park Authority.

## Summary

The Conservation of Habitats and Species Regulations 2017 (as amended) require the assessment of plans or projects in relation to internationally important sites for biodiversity in. These sites include Special Protection Areas, Special Areas of Conservation and Ramsar sites and are known as European sites. The assessment is achieved by means of a Habitats Regulations Assessment (HRA). This report is the HRA of the Pembrokeshire Coast National Park Management Plan 2025 – 2029.

An HRA asks very specific questions. Firstly, it ‘screens’ the project to identify if there is a risk that certain aspects may have a ‘likely significant effect’ on a European site, alone or (if necessary) in-combination with other plans and projects. If the risk of likely significant effects can be ruled out, then the plan may be approved but if it cannot, it must be subjected to the greater scrutiny of an ‘appropriate assessment’ and an ‘integrity test’. At this stage, the plan can normally only be approved if an ‘adverse effect on the integrity’ of European sites can be ruled out. Where possible, a plan should be amended to avoid or mitigate any conflicts to achieve this outcome.

The Pembrokeshire Coast National Park is exceptionally rich in biodiversity and there are a total of 21 European sites within a 20km radius of the National Park. These include sites such as the Preseli, the offshore islands (Skomer, Skokholm, Ramsey), the River Teifi, the St. David’s Commons and Carmarthen Bay and Estuaries. The various qualifying features include a range of coastal, marine, heathland and woodland habitats as well as species such as Chough, seabirds, a range of fish, Harbour Porpoise, Bats and a range of invertebrates.

The Plan is very broad and strategic in nature. It does not include specific locations or detailed actions and the policies are wide ranging, falling under the themes of Conservation, Connection, Climate and Natural Capital and Communities. Many of the policies are positive for the environment and seek outcomes that enhance biodiversity,

Nonetheless, screening identified 8 policies where likely significant effects could not be ruled out and these were taken forward to appropriate assessment. The risks associated with these various policies fall into two broad themes:

- Ground works with potential risks relating to direct damage and disturbance (Policy L1/D which is intended to reduce the visual impact of existing infrastructure, e.g. telecommunications and power distribution networks);
- Increased recreation use (Policies W1/A, W1/B, W1/D, W1/H, W2/A, W2/B and SE1/D all of which include some intention to promote, extend or support recreation provision).

These policies are considered in more detail within the appropriate assessment section and we conclude that adverse effects on integrity can be ruled out for all relevant European sites alone or in-combination with other policies, or other plans or projects. This conclusion is dependent on Policy E1/K, which provides comprehensive wording relating to the need for

HRA for any further (more detailed) proposals and ensures necessary checks are in place. E1/K is catch-all policy wording that eliminates harm to European sites.

## Contents

Summary.....	ii
Contents.....	iv
1. Introduction.....	1
Overview.....	1
The Plan.....	1
HRAs and legislative context .....	1
European sites.....	2
Process .....	3
Definitions, references to case law and guidance.....	6
Previous versions of the Plan and relevant HRA work.....	9
2. European sites .....	10
Overview of potentially relevant European sites .....	10
3. Screening for likely significant effects.....	15
What constitutes a likely significant effect?.....	15
The screening.....	16
4. Appropriate Assessment and Integrity Test .....	31
Impacts from ground works.....	32
Increased recreation .....	33
References .....	35
Appendix 1: European sites .....	37

### Acknowledgements

This report has been commissioned by the Pembrokeshire Coast National Park Authority. Our thanks to Michel Regelous for overseeing the commission.

# 1. Introduction

## Overview

- 1.1 This report is a Habitats Regulations Assessment (HRA) for the Pembrokeshire National Park Management Plan, *A Partnership Plan for the National Park 2025-2029*, 'the Plan'.
- 1.2 HRA is the step-by-step process of ensuring that a plan or project being undertaken by, or permitted by, a public body will not adversely affect the ecological integrity of any European wildlife sites. This HRA will form part of the evidence base for the Plan and has been commissioned by the Pembrokeshire Coast National Park Authority (PCNPA).

## The Plan

- 1.3 The Plan seeks to secure the National Park purposes over a five-year period through partnership action, with policies that fall within 4 complimentary themes of Conservation, Connection, Climate and Natural Capital, and Communities.

## HRAs and legislative context

- 1.4 The designation, protection and restoration of key wildlife sites is embedded in the Conservation of Habitats and Species Regulations 2017, as amended, which are commonly referred to as the 'Habitats Regulations'. These are domestic law and remain in place post Brexit. The most recent amendments (the Conservation of Habitats and Species (amendment) (EU Exit) Regulations 2019<sup>1</sup>) take account of the UK's departure from the EU.

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<sup>1</sup> The amending regulations generally seek to retain the requirements of the 2017 Regulations but with adjustments for the UK's exit from the European Union. See Regulation 4, which also confirms that the interpretation of these Regulations as they had effect, or any guidance as it applied, before exit day, shall continue to do so.

- 1.5 Regulation 105 *et seq* addresses the assessment of local plans and determines the scope of this HRA alongside recent Government Guidance on the interpretation and application of the Regulations<sup>2</sup>.
- 1.6 Competent authorities must carry out an assessment under the Habitats Regulations (an HRA), to test if a plan or project proposal could significantly harm the designated features of a European site.
- 1.7 Competent authorities include any public body that decides to give a licence, permit, consent or other permission for work to happen, adopt a plan or carry out work for itself, such as a local planning authority.

### **European sites**

- 1.8 'European sites' are those over which the provisions of the Habitats Regulations exert an influence, through statute or policy. They are the top tier of protected sites in the UK and are of international importance for nature conservation.
- 1.9 Sites that are afforded statutory protection and included within regulation 8 of the Habitats Regulations are part of a 'national network' and referred to as Habitats sites. Statutory sites comprise the following:
- Special Areas of Conservation (SACs) designated under the 1992 Habitats Directive;
  - Sites of Community Importance (SCI) included on the list of such sites compiled by the European Commission and submitted before the UK left the EU;
  - Candidate SACs (cSACs), submitted by the UK government to the European Commission before Exit day as eligible for selection as an SCI;
  - Special Protection Areas (SPAs) classified under the 1979 Birds Directive;
- 1.10 As a matter of policy, the following sites are also European sites:

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<sup>2</sup> Habitats regulations assessments: protecting a European site. Defra and Natural England. 24 February 2021. <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>.

- 'Wetlands of International Importance' (Ramsar sites, listed under the Convention) or proposed Ramsar sites;
- Potential SPAs (pSPAs),
- Possible / proposed SACs
- Areas providing formal compensation for damage to a European site.

1.11 The overarching objectives of the national network are to maintain, or where appropriate, restore habitats and species listed in Annexes I and II of the Habitats Directive to a Favourable Conservation Status, and contribute to ensuring, in their area of distribution, the survival and reproduction of wild birds and securing compliance with the overarching aims of the Wild Birds Directive.

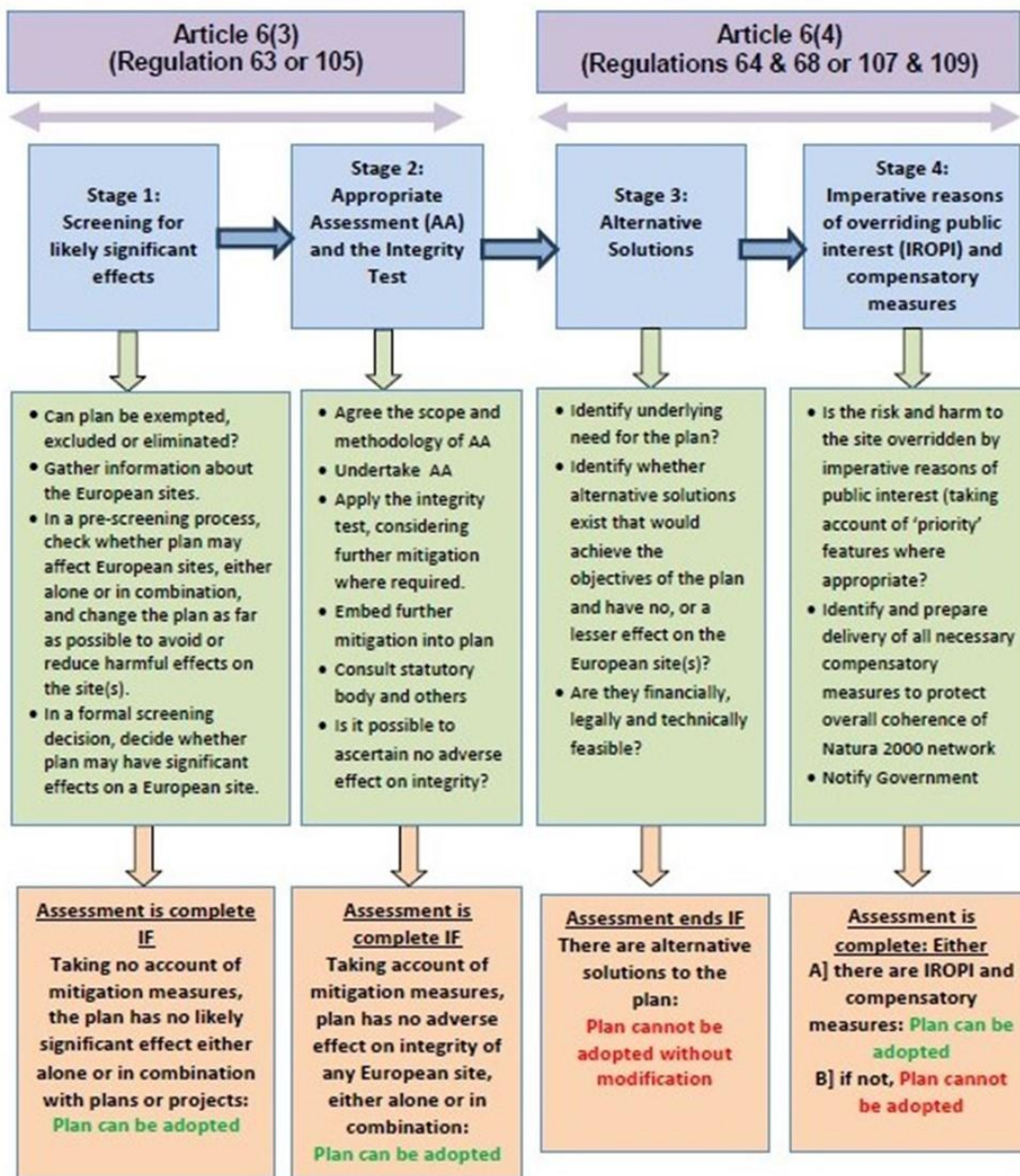
1.12 The appropriate authorities must have regard to the importance of protected sites, coherence of the national site network and threats of degradation or destruction (including deterioration and disturbance of protected features) on SPAs and SACs.

### **Process**

1.13 Plans and projects which are directly connected with or necessary to the management of a European site may be exempt from the HRA process. For all other plans or projects, assessment proceeds through a step-by-step process, summarised in Figure 1.



Outline of the four-stage approach to the assessment of plans under the Habitats Regulations



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Figure 1: Outline of the assessment of plans under the Habitat Regulations. Though dated prior to the latest amendments to the Regulations, the same tests still apply and it remains valid.

1.14 Throughout all stages, there is a continual consideration of the options available to avoid and mitigate any identified potential

impacts. A competent authority may consider that there is a need to undertake further levels of evidence gathering and evaluation at the appropriate assessment stage in order to provide the necessary certainty. At this point the competent authority may identify the need to add to or modify the plan in order to adequately protect the European site, and these mitigation measures may be added through the imposition of particular restrictions and conditions.

- 1.15 For plans, the stages of HRA are often quite fluid, with the plan normally being prepared by the competent authority itself. This gives the competent authority the opportunity to repeatedly explore options to prevent impacts, refine the plan and rescreen it to demonstrate that all potential risks to Habitat sites have been successfully dealt with.
- 1.16 When preparing a plan, a competent authority may therefore go through a continued assessment as the plan develops, enabling the assessment to inform the development of the plan. For example, a competent authority may choose to pursue an amended or different option where impacts can be avoided, rather than continue to assess an option that has the potential to significantly affect Habitat site interest features.
- 1.17 After completing an assessment, a competent authority should only adopt a plan where it can be ascertained that there will not be an adverse effect on the integrity of the Habitat site(s) in question. In order to reach this conclusion, the competent authority may have made changes to the plan, or modified the project with restrictions or conditions, in light of their Appropriate Assessment findings.
- 1.18 Where adverse effects cannot be ruled out, further exceptional tests are set out in Regulation 107. In exceptional cases, this allows a plan to be taken forward where there are no 'alternative solutions', where 'imperative reasons of overriding public interest' apply and where compensation can be delivered. It should be noted that meeting these tests is a rare last resort and ordinarily, competent authorities seek to ensure that a plan or project is fully mitigated for, or it does not proceed.

1.19 In such circumstances where a competent authority considers that a plan should proceed under Regulations 107, they must notify the relevant Secretary of State. Normally, planning decisions and competent authority duties are then transferred, becoming the responsibility of the Secretary of State, unless on considering the information, the planning authority is directed by the Secretary of State to make their own decision on the plan or project at the local level. The decision maker, whether the Secretary of State or the planning authority, should give full consideration to any proposed ‘overriding reasons’ for which a plan or project should proceed despite being unable to rule out adverse effects on Habitat site interest features, and ensure that those reasons are in the public interest and are such that they override the potential harm. The decision maker will also need to secure any necessary compensatory measures, to ensure the continued overall coherence of the Habitat site network if such a plan or project is allowed to proceed. However, it is understood that Pembrokeshire Coast National Park Authority would not wish to pursue these derogations.

### **Definitions, references to case law and guidance**

- 1.20 This HRA follows principles of case law, both UK and EU. It also refers as appropriate to the Habitats Regulations Assessment Handbook (Tyldesley and Chapman, 2021), to which Footprint Ecology subscribes. We also follow relevant government guidance.
- 1.21 Drawing on the Handbook, other relevant guidance and case law, we clarify the following terms used in the flow chart (Figure 1).
- 1.22 In Stage 1, A **‘likely significant effect’** following Waddenzee<sup>3</sup>, is a *‘possible significant effect; one whose occurrence cannot be excluded on the basis of objective information’*. It is a low threshold and simply means that there is a risk or doubt regarding such an effect. The screening stage is a preliminary examination, sometimes described as

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<sup>3</sup> Waddenzee: European Courts C-127/02 Waddenzee 7<sup>th</sup> September 2004, reference for a preliminary ruling from the Raad van State.

a coarse filter, or following *Sweetman*<sup>4</sup>, as ‘a trigger for the obligation to carry out an appropriate assessment’. There should however be credible evidence to show that there is a real rather than a hypothetical risk of effects that could undermine a site’s conservation objectives. This was amplified in the *Bagmoor Wind*<sup>5</sup> case where ‘if the absence of risk... can only be demonstrated after a detailed investigation, or expert opinion, [then] the authority must move from preliminary examination to appropriate assessment’.

- 1.23 Following the *People Over Wind* judgement<sup>6</sup>, when making screening decisions for the purposes of deciding whether an appropriate assessment is required, competent authorities cannot take into account any measures intended to avoid or reduce harmful effects upon a European site.
- 1.24 Stage 2 involves the **appropriate assessment and integrity test**. Here a plan can only be adopted if the competent authority can demonstrate that it will not adversely affect the integrity of the Habitat site. This is precautionary approach and means it is necessary to show the absence of harm.
- 1.25 Following *Champion*<sup>7</sup> ‘**appropriate**’ is not a technical term but simply indicates that the assessment needs to be appropriate to the task in hand.
- 1.26 The **integrity** of a Habitat site has been described as the ‘coherence of its ecological structure and function, across its whole area, that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was classified<sup>8</sup>. An alternative

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<sup>4</sup> Sweetman: European Court C – 258/11 Sweetman 11<sup>th</sup> April 2013, reference for a preliminary ruling from the Supreme Court of Ireland.

<sup>5</sup> Bagmoor Wind: UK courts Bagmoor Wind v The Scottish Ministers, Court of Session [2012] CSIH 93.

<sup>6</sup> *People Over Wind and Sweetman v Coillte Teoranta* (323-17) [2018] PTSR 1668

<sup>7</sup> *R (on the application of Champion v North Norfolk District Council* [2015] 1 WLR 3170 at para 41

<sup>8</sup> Para 20 of the ODPM Circ. 06/2005

definition, after *Sweetman*<sup>9</sup>, is ‘the lasting preservation of the constitutive characteristics of the site’.

- 1.27 In terms of the burden of proof, the HRA of development plans was first made a requirement in the UK following a ruling by the European Court of Justice in *EC v UK*<sup>10</sup>. However, the judgement<sup>11</sup> recognised that any assessment had to reflect the actual stage in the strategic planning process and the level of evidence that might or might not be available. This was given expression in the High Court (*Feeney*)<sup>12</sup> which stated: “*Each ... assessment ... cannot do more than the level of detail of the strategy at that stage permits*”.
- 1.28 The need to consider possible **in-combination** effects arises at stage 1 – the screening and also at stage 2 – the appropriate assessment and integrity test. The effects of the plan in-combination with other plans or projects are the cumulative effects which will or might arise from the addition of the effects of other relevant plans or projects alongside the plan under consideration. If during the stage 1 screening it is found the subject plan would have no likely effect alone, but might have such an effect in-combination then the appropriate assessment at stage 2 will proceed to consider cumulative effects. Where a plan is screened as having a likely significant effect alone, the appropriate assessment should initially concentrate on its effects alone. Role of the competent authority
- 1.29 This report is a shadow HRA that has been prepared to help Pembrokeshire Coast National Park discharge its duties under the Habitats Regulations, Pembrokeshire Coast National Park Authority is the competent authority, and it must decide whether to accept this report and adopt the conclusions or otherwise.

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<sup>9</sup> *Sweetman v An Bord Pleanála* (C-258-11) [2014] PTSR 1092 at paragraph 39

<sup>10</sup> *Commission v UK* (C-6/04) [2005] ECR I-9017

<sup>11</sup> *Commission of the European Communities v UK* Opinion of Advocate General Kokott

<sup>12</sup> *Feeney v Oxford City Council* [2011] EWHC 2699 Admin at paragraph 92

## Previous versions of the Plan and relevant HRA work

- 1.30 The Plan is the latest management plan in a series, with previous versions covering 2009-2013, 2015-2019 and 2020-2024. Previous versions have been accompanied by HRA work (see Chapman, 2019 for the previous HRA). Where appropriate we adopt the assessment, reasoning or conclusions from this previous HRA work, in line with approach followed by Chapman in 2019 and in line with the HRA Handbook (Part C12) and relevant government guidance<sup>13</sup> relating to competent authority co-ordination.
- 1.31 Also relevant to this HRA is the Local Development Plan. The Local Development Plan (LDP) provides the legal framework for the development and use of land within the National Park and was adopted in 2020. The Local Development Plan was subject to an HRA (Chapman, 2018) and this concluded that the plan would have no adverse effect on the integrity of any European sites. As appropriate therefore, this assessment can also adopt the reasoning, assessment and conclusion of that earlier HRA in respect of any references made to it within the National Park Management Plan on the basis that:
- No material information has emerged which would render the reasoning 'out of date', and
  - The analysis underpinning the reasoning is sufficiently rigorous and robust.

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<sup>13</sup> Defra guidance on competent authority coordination under the Habitats Regulations. This guidance is now withdrawn and has been replaced by the general guidance on the Habitats Regulations which includes a section on competent authority coordination <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>

## 2. European sites

### Overview of potentially relevant European sites

- 2.1 A total of 21 European sites are wholly or partly within 20km of the Pembrokeshire Coast National Park boundary, and all but three directly border or are contained within the National Park itself. These are all either SACs or SPAs, with large expanses of the marine environment also covered under such protection. There are no Ramsar sites within 20km of the National Park. These sites are shown in Maps 1 and 2 and full details of the qualifying features, links to the conservation objectives and a description of the site are given in Appendix 1.
- 2.2 We have chosen 20km as it provides a reasonable area of search within which policies could reasonably be considered to generate measurable effects. Air quality impacts at plan level are typically considered to relate to a 10km distance (Chapman & Kite, 2021) while generic analysis of Footprint Ecology visitor data to countryside sites in the UK (Weitowitz et al., 2019) indicates that the majority of visitors originate within a 12.6km radius. The choice of 20km is therefore, if anything, precautionary and generates a list that matches that used in the previous HRA.
- 2.3 The sites are listed in Table 1 below.

**Table 1: European sites within 20km of the Pembrokeshire National Park boundary. For scientific names of species see Appendix 1. Green shading reflects SAC sites, paler grey shading SPA sites.**

European site	Distance from NFNP boundary (km)	Summary of qualifying features
Afon Teifi / River Teifi SAC	Just within the boundary (mostly outside)	Aquatic habitats, Floating Water-Plantain, Brook Lamprey, River Lamprey, Atlantic Salmon, Bullhead, Otter, Sea Lamprey
Afonydd Cleddau / Cleddau Rivers SAC	Within the boundary	Aquatic, woodland and wetland habitats,

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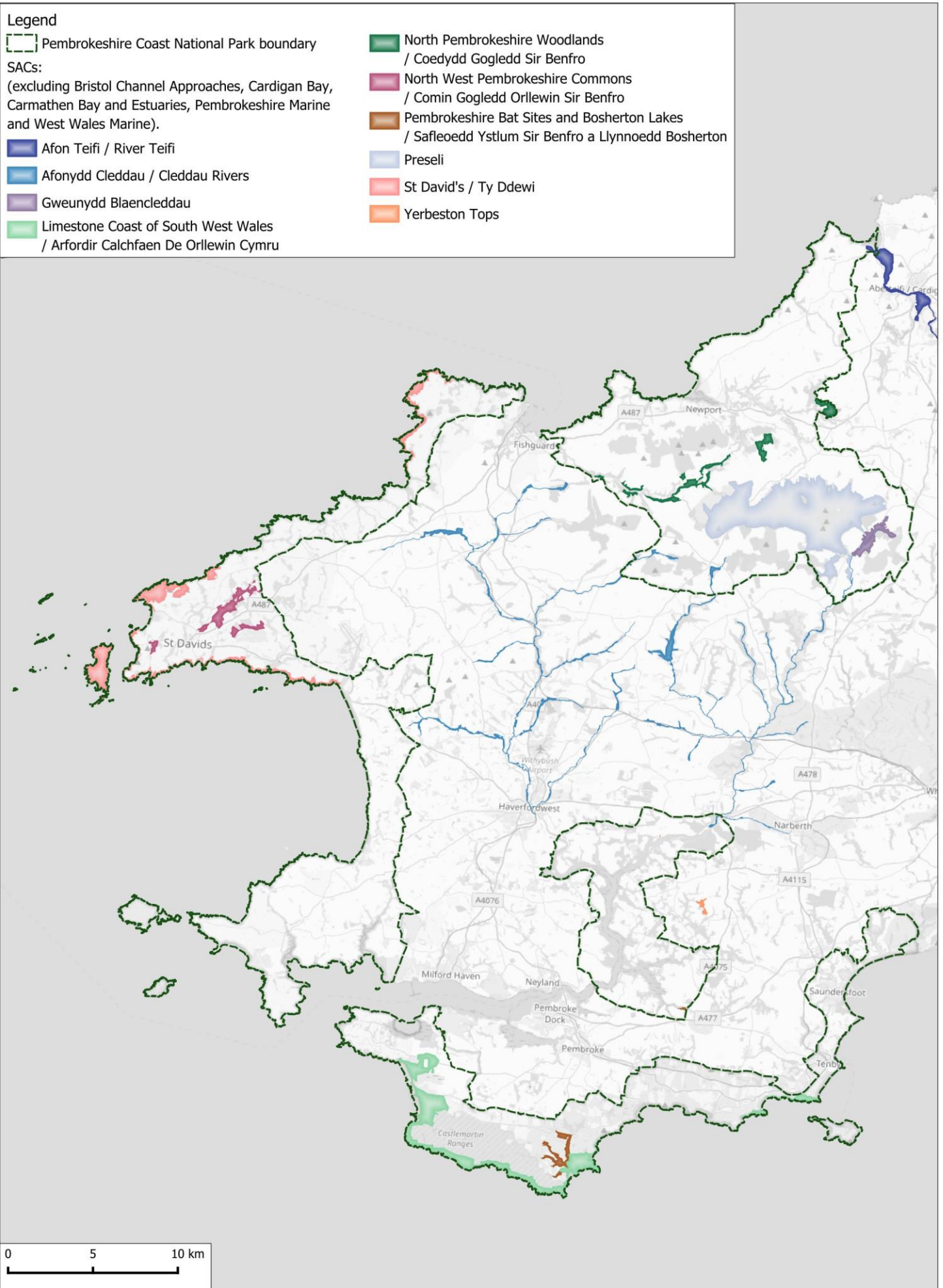
European site	Distance from NFNP boundary (km)	Summary of qualifying features
		Brook Lamprey, River Lamprey, Sea Lamprey, Atlantic Salmon, Bullhead, Otter
Bristol Channel Approaches / Dynesfeydd Môr Hafren SAC	Within the boundary	Harbour Porpoise
Cardigan Bay / Bae Ceredigion SAC	Within the boundary	3 Marine Habitats, River Lamprey, Sea Lamprey, Bottlenose Dolphin, Grey Seal
Carmarthen Bay and Estuaries / Bae Caerfyrddin ac Aberoedd SAC	Within the boundary	5 Marine/Estuarine Habitats, Twaite Shad Sea Lamprey River Lamprey Allis Shad
Carmarthen Bay Dunes / Twyni Bae Caerfyrddin SAC	5.6	Sand Dunes, Narrow-Mouthed Whorl Snail, Petalwort And Fen Orchid
Gweunydd Blaencleddau SAC	-	Range of wetland, damp grassland and heathland habitats, Marsh Fritillary, Southern Damselfly
Limestone Coast of South West Wales / Arfordir Calchfaen De Orllewin Cymru SAC	Within the boundary	Coastal, heathland and grassland habitats, Caves, Greater Horseshoe Bat, Early Gentian Petalwort
North Pembrokeshire Woodlands / Coedydd Gogledd Sir Benfro SAC	Within the boundary	Woodland habitats Barbastelle Bat
North West Pembrokeshire Commons / Comin Gogledd Orllewin Sir Benfro SAC	Within the boundary	Heathland, grassland and wetland habitats. Floating Water-Plantain
Pembrokeshire Bat Sites and Bosherton Lakes / Safleoedd Ystlum Sir Benfro a Llynnoedd Bosherton SAC	Within the boundary	Aquatic Habitat, Greater Horseshoe Bat, Lesser Horseshoe Bat Otter
Pembrokeshire Marine / Sir Benfro Forol SAC	Within the boundary	Coastal and marine habitats, Grey Seal, Shore Dock, Sea Lamprey, River Lamprey, Allis Shad, Twaite Shad,



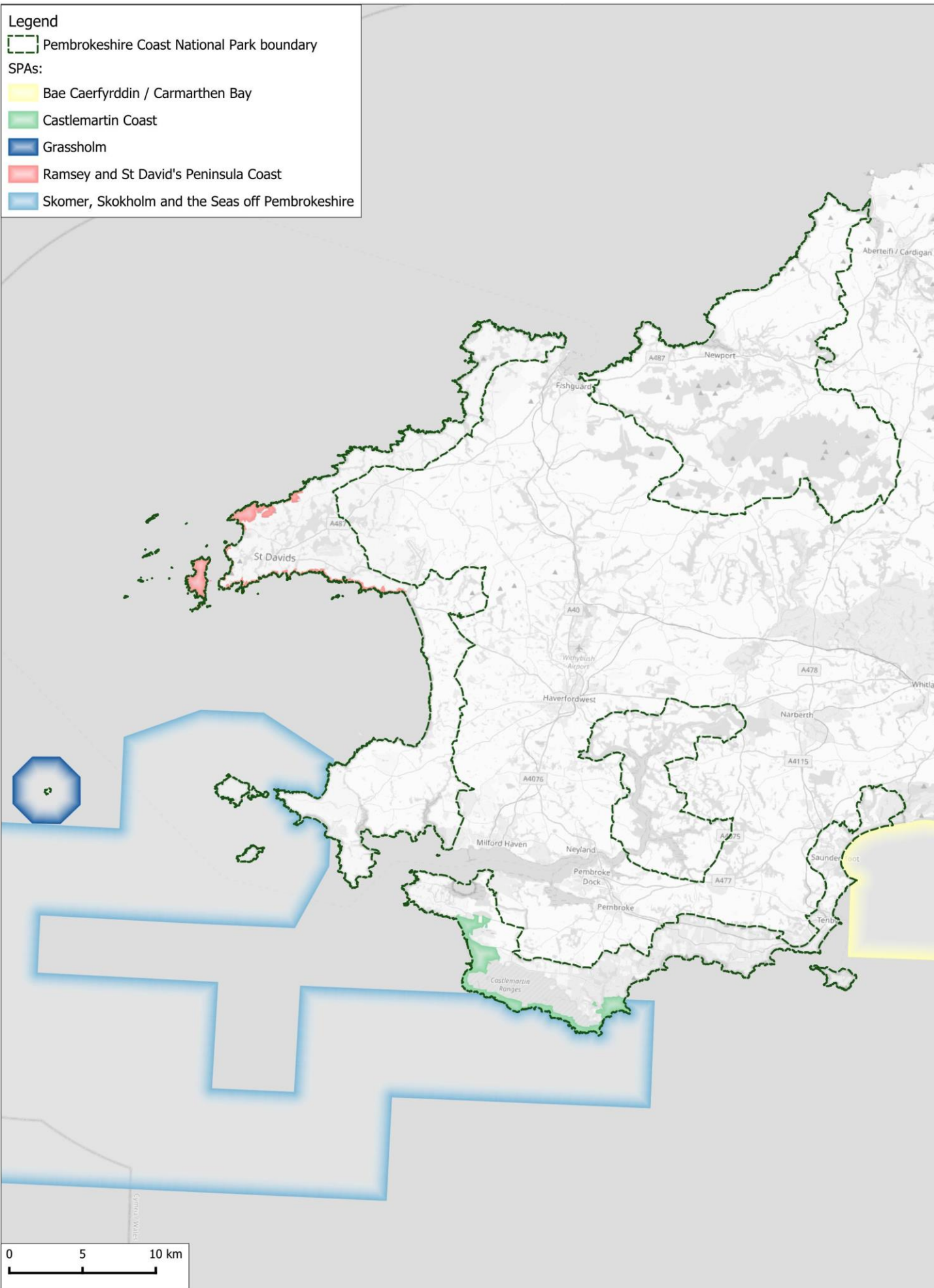
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European site	Distance from NFNP boundary (km)	Summary of qualifying features
		Otter
Preseli SAC	Within the boundary	Heathland and wetland habitats, Southern Damselfly, Marsh Fritillary Butterfly, Slender Green Feather-Moss
St David's / Ty Ddewi SAC	Within the boundary	Coastal and heathland habitats Floating Water-plantain
West Wales Marine / Gorllewin Cymru Forol SAC	Within the boundary	Harbour Porpoise
Yerbeston Tops SAC	2.6	Grassland habitat Marsh Fritillary
Bae Caerfyrddin / Carmarthen Bay SPA	Within the boundary	Common Scoter
Castlemartin Coast SPA	Within the boundary	Chough
Grassholm SPA	Within the boundary	Gannet
Ramsey and St David's Peninsula Coast SPA	Within the boundary	Chough
Skomer, Skokholm and the Seas off Pembrokeshire SPA	Within the boundary	Short-Eared Owl, Puffin, Storm Petrel, Lesser Black-Backed Gull, Manx Shearwater, Chough

# Map 1: SACs within 20km of Pembrokeshire Coast National Park



**Map 2: SPAs within 20km of Pembrokeshire Coast National Park**



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### 3. Screening for likely significant effects

- 3.1 The Plan is not directly connected with or necessary to the management of a European site (meaning that HRA is required). The screening is the first step in the 4-stage process of HRA.
- 3.2 The screening for likely significant effects of a plan involves checking all aspects of the plan and identifying any areas of potential concern, which are then examined in more detail in the appropriate assessment (stage 2) of the HRA. The check for likely significant effects provides an initial test of the plan. It is undertaken to enable the plan maker as competent authority to do two things. Firstly, it narrows down and highlights those elements of the plan that may pose a risk to European sites. Secondly, where an option poses a risk but is a desired element of the plan, the screening exercise identifies where further assessment is necessary in order to determine the nature and magnitude of potential impacts on European sites and what could be done to avoid, cancel, reduce or eliminate those risks.

#### **What constitutes a likely significant effect?**

- 3.3 Where the screening identifies risks that cannot be avoided with simple clarifications, corrections or instructions for project level HRA, a more detailed assessment is undertaken to gather more information about the likely significant effects and give the necessary scrutiny to potential mitigation measures. This is the appropriate assessment stage of HRA.
- 3.4 A likely significant effect could be concluded on the basis of clear evidence of risk to a European site interest, or there could be a scientific and plausible justification for concluding that a risk is present, even in the absence of direct evidence. The latter is an example of the precautionary approach, which is embedded through the HRA process. The precautionary principle should be applied at all stages in the HRA process and follows the principles established in domestic and EU case law.



3.5 The screening in this report looks at policies prior to any avoidance/reduction measures in line with *People Over Wind*<sup>14</sup>; measures intended to avoid or reduce harmful effects to a European site can only be considered at Appropriate Assessment stage. *People Over Wind* clarified the need to carefully explain actions taken at each HRA stage, particularly at the screening for likely significant effects stage. The Judgment highlights the need for clear distinction between the stages of HRA, and good practice in recognising the function of each. The screening for likely significant effects stage should function as a screening or checking stage (regardless of avoidance/reduction/mitigation measures), to determine whether further assessment is required. Assessing the nature and extent of potential impacts on Habitat site interest features, and the robustness of mitigation options, should be done at the appropriate assessment stage.

## The screening

3.6 Table 2 below provides the screening of the Management Plan. The screening covers the whole plan. Where risks are highlighted and there is a possibility of significant effects on Habitat sites, further and more detailed appropriate assessment will be required. Inevitably there will be precaution in screening elements of the plan, as the purpose of screening for likely significant effects is to identify where there is either no possibility of an effect, or where there are uncertainties.

3.7 In undertaking the screening, we have broadly used the following categories as set out in the Habitats Regulations Handbook (F.6.3) and that were also used in the HRA of the previous version of the Plan.

- Category A: General statements of policy / general aspirations;
- Category B: Policies listing general criteria for testing the acceptability / sustainability of proposals;
- Category C: Proposal referred to but not proposed by the plan;

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<sup>14</sup> People Over Wind: European Court Case C-323/17 People Over Wind & Peter Sweetman v Coillte Teoranta 12 April 2018.

- Category D: General plan-wide environmental protection / site safeguarding/ threshold policies;
- Category E: Policies or proposals that steer change in such a way as to protect European sites from adverse effects;
- Category F: Policies or proposals that cannot lead to development or other change;
- Category G: Policies or proposals that could not have any conceivable adverse effect on a site;
- Category H: Policies or proposals the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects);
- Category I: Policies or proposals which may have a significant effect of a site alone;
- Category J: Policies or proposals unlikely to have a significant effect alone;
- Categories K and L: Policies or proposals unlikely to have a significant effect either alone or in combination (K) or which might be likely to have a significant effect in combination (L) after the in combination test;
- Category M: Bespoke area, site or case specific policies or proposals intended to avoid harmful effects on a European site.

**Table 2: Screening of the Pembrokeshire Coast Management Plan for likely significant effects ('LSE'). Blue shaded rows with bold, italicised text indicates policies that are screened in, alone or in-combination. Grey shading and bold text indicates headings for ease for reference.**

Plan section / policy	Description	LSE screening	Potential risks	Comments
<b>Chapter 1: A living, working landscape</b>				
<b>Chapter 2: Special qualities of the National Park</b>				
<b>Chapter 3: The state of the Park – challenges and opportunities</b>				
<b>Chapter 4: Conservation</b>				
<b>Policy L1: Conserve and enhance National Park landscapes and seascapes</b>				
L1/A	Protect the important visual horizons of the National Park from development, including energy generation and major development.	No LSE. Policy that cannot lead to development or other change; policy sets plan wide-environmental protection.		
L1/B	Ensure development does not have unacceptable adverse landscape and seascape impacts and delivers high quality design.	No LSE. Policy that cannot lead to development or other change.		
L1/C	Manage the impacts of permitted development rights for camping and caravan sites.	No LSE. Policy that cannot lead to development or other change.		Environmentally positive policy which will help to reduce recreation impacts. Not however a specific policy intended to avoid or reduce harmful effects on a European site and therefore no need (under <i>People vs Wind</i> ) to screen in.
<b>L1/D</b>	<b><i>Reduce the visual impact of existing infrastructure, e.g. telecommunications and power distribution networks, for example by undergrounding for cables or sharing towers.</i></b>	<b><i>LSE. Policy which may have a significant effect on a site alone.</i></b>	<b><i>All sites as policy very general. Risks from ground disturbance, direct</i></b>	<b><i>While policy is not specific to a location, work to reduce visual impacts could have impacts in</i></b>

P E M B R O K E S H I R E M A N A G E M E N T P L A N H R A 2 0 2 4

Plan section / policy	Description	LSE screening	Potential risks	Comments
			<i>damage (e.g. installation of underground cables) or noise etc from any works,</i>	<i>terms of disturbance or direct damage.</i>
L1/E	Management of litter, including seaborne litter, and raise awareness of its impacts.	No LSE. Policy that cannot lead to development or other change; policy sets plan wide-environmental protection.		Environmentally positive policy which will help to reduce recreation impacts. Not however a specific policy intended to avoid or reduce harmful effects on a European site and therefore no need (under <i>People vs Wind</i> ) to screen in.
<b>Policy E1: Conserve and enhance biodiversity quality, extent and connectivity at scale.</b>				
E1/A	Practical support for conservation land management projects to deliver biodiversity benefits.	No LSE. Policy that cannot lead to development or other change.		Environmentally positive policy likely to lead to enhanced biodiversity.
E1/B	Support for farmers, especially the dairying sector, to reduce impacts on soil and water through regenerative practices.	No LSE. Policy that cannot lead to development or other change.		
E1/C	Specific projects to conserve species for which Pembrokeshire is uniquely important (e.g. Southern damselfly, a feature of the Preseli Special Area of Conservation) and local places for nature.	No LSE. Policy that cannot lead to development or other change; policy sets plan wide-environmental protection.		
E1/D	Management of invasive non-native and /or harmful species and pathogens.	No LSE. Policy cannot lead to development or other change.		Vague about type of pathogens (e.g. waterborne, airborne) however like to have positive environmental effects.



P E M B R O K E S H I R E M A N A G E M E N T P L A N H R A 2 0 2 4

Plan section / policy	Description	LSE screening	Potential risks	Comments
E1/E	Management and mitigation of wildfire risks through appropriate public engagement, best practice awareness and practical support.	No LSE. Policy that cannot lead to development or other change; policy sets plan wide-environmental protection.		Policy wording general, however likely to counteract impacts from recreation. Not however a specific policy intended to avoid or reduce harmful effects on a European site and therefore no need (under People vs <i>Wind</i> ) to screen in.
E1/F	Planning applications deliver net benefit for biodiversity.	No LSE. Policy cannot lead to development or other change.		Policy doesn't detail where or volume of planning that may be approved.
E1/G	Sites of actual or potential nature value are directly managed, through purchase or lease, where this is a cost-effective conservation management option.	No LSE. Policy that cannot lead to development or other change; policy sets plan wide-environmental protection.		
E1/H	Wildlife crime is reduced and appropriate action taken if it occurs.	No LSE. Policy cannot lead to development or other change.		
E1/I	Damage to conservation features of SSSIs and Special Areas of Conservation is prevented and remediated.	No LSE. General plan-wide environmental protection policy.		This is a general policy and not specifically intended to avoid or reduce harm to a European site.
E1/J	Locally-produced, environmentally sound and socially responsible food is supported.	No LSE. Policy cannot lead to development or other change.		
E1/K	Proposals which have a likely significant adverse effect (either alone or in combination with other plans and projects) on the UK National Site Network sites are resisted, unless it can be established through appropriate assessment that they will have no significant adverse effect on the integrity of the site(s) concerned.	No LSE. General plan-wide environmental protection policy.		This is a general policy and not specifically intended to avoid or reduce harm to a European site.

**Policy E2: Conserve and enhance marine biodiversity.**

P E M B R O K E S H I R E M A N A G E M E N T P L A N H R A 2 0 2 4

Plan section / policy	Description	LSE screening	Potential risks	Comments
E2/A	Management schemes for marine UK National Site Network are delivered.	No LSE. Policy cannot lead to development or other change.		
E2/B	Bait-digging and species collection in the intertidal zone is managed.	No LSE. Policy cannot lead to change.		Policy wording not to a specific area and levels of management/bait digging not defined. Will not result in any increase or particular change that might have effects
E2/C	The Milford Haven Waterway meets water quality standards and its environmental state is improved.	No LSE. Policy cannot lead to development or other change.		Policy likely to have a positive effect on water quality.
E2/D	Seagrass and saltmarsh habitats are restored.	No LSE. Policy cannot lead to development or other change.		Environmentally positive policy, likely to benefit some European sites with such habitats.
E2/E	Management objectives of the Skomer Marine Conservation Zone are achieved.	No LSE. Policy that cannot lead to development or other change; policy sets plan wide-environmental protection.		Policy likely to have a positive impact on Skomer, Skokholm and the Seas off Pembrokeshire SPA.
E2/F	Lighting impacts on vulnerable species and species groups are reduced.	No LSE. Policy cannot lead to development or other change.		
E2/G	Recreational disturbance to wildlife is managed e.g. through codes of conduct, restrictions and awareness-raising.	No LSE. Policy that cannot lead to development or other change; policy sets plan wide-environmental protection.		Will help counteract impacts from recreation. Not however a specific policy intended to avoid or reduce harmful effects on a European site and therefore no need (under <i>People vs Wind</i> ) to screen in.
E2/H	Marine contingency planning and response procedures are in place.	No LSE. Policy cannot lead to development or other change.		

P E M B R O K E S H I R E M A N A G E M E N T P L A N H R A 2 0 2 4

Plan section / policy	Description	LSE screening	Potential risks	Comments
E2/I	Plastics and microplastics in the environment are reduced.	No LSE. Policy cannot lead to development or other change.		Environmentally positive policy likely to reduce harm.
E2/J	Wales' Marine Protected Area Network and wider coastal and marine environment is managed sustainably.	No LSE. Policy that cannot lead to development or other change; policy sets plan wide-environmental protection.		
<b>Policy L2: Protect and enhance dark night skies.</b>				
L2/A	Light impacts of community and business premises are reduced.	No LSE. Policy that cannot lead to development or other change.		
L2/B	Supplementary planning guidance for Pembrokeshire on lighting is adopted.	No LSE. Policy that cannot lead to development or other change.		
L2/C	Planning approvals involving lighting are monitored.	No LSE. Policy that cannot lead to development or other change.		
<b>Policy L3: Protect and enhance earth heritage.</b>				
L3/A	Geological Conservation Review sites and Regionally Important Geodiversity Sites are conserved and enhanced.	No LSE. Policy that cannot lead to development or other change.		
<b>Policy L4: Protect and enhance natural soundscapes.</b>				
L4/A	The Noise and Soundscape Plan for Wales 2023-2028 is supported.	No LSE. Policy that cannot lead to development or other change.		
L4/B	Noise monitoring data are shared.	No LSE. Policy that cannot lead to development or other change.		
<b>Chapter 5: Connection</b>				

P E M B R O K E S H I R E M A N A G E M E N T P L A N H R A 2 0 2 4

Plan section / policy	Description	LSE screening	Potential risks	Comments
<b>Policy H1: Conserve and enhance landscapes of historic interest, Conservation Areas, monuments, buildings of interest, and their settings.</b>				
H1/A	Public awareness and enjoyment of historic landscapes, buildings and monuments is enhanced.	No LSE. Policy that cannot lead to development or other change.		
H1/B	Listed Buildings are conserved and enhanced e.g. using pre-application service.	No LSE. Policy that cannot lead to development or other change.		
H1/C	Development in Conservation Areas is managed in accordance with Conservation Management Plans, Article 4 requirements and designation of new Areas.	No LSE. Policy that cannot lead to development or other change.		Policy likely to lead to environmental protection, in accordance with the named Conservation Management Plans.
H1/D	Communities and volunteers in heritage monitoring and conservation are engaged and supported.	No LSE. Policy that cannot lead to development or other change.		
H1/E	Monuments in unfavourable condition are stabilised and enhanced; sites at risk of coastal erosion are recorded.	No LSE. Policy that cannot lead to development or other change.		
H1/F	Field boundaries are conserved and restored, with a particular emphasis on areas of registered historic landscapes and relevance to connectivity for biodiversity.	No LSE. Policy that cannot lead to development or other change.		Environmentally positive policy likely to enhance biodiversity.
H1/G	Pembrokeshire Coast National Park Authority's <i>Local Development Plan 2</i> heritage policies and associated guidance are implemented (including review of tree preservation orders).	No LSE. Policy that cannot lead to development or other change.		All references to the LDP can be screened out with reference to earlier HRA findings and conclusions
H1/H	Research and policy affecting the National Park's historic environment are supported.	No LSE. Policy that cannot lead to development or other change.		

P E M B R O K E S H I R E M A N A G E M E N T P L A N H R A 2 0 2 4

Plan section / policy	Description	LSE screening	Potential risks	Comments
H1/I	Heritage crime is reduced and appropriate action taken if it occurs.	No LSE. Policy that cannot lead to development or other change.		
H1/J	Local distinctiveness in the built environment is celebrated and conserved.	No LSE. Policy that cannot lead to development or other change.		
H1/K	Place names, e.g. field names, are celebrated and conserved.	No LSE. Policy that could not have any conceivable adverse effect on a site.		
<b>Policy H2: Promote the Welsh language and local dialects, and celebrate culture and creativity related to the landscape.</b>				
H2/A	Progress is made on the target <sup>15</sup> for the number of people able to enjoy speaking and using Welsh to reach a million by 2050.	No LSE. Policy that could not have any conceivable adverse effect on a site.		
H2/B	Landscape, cultural heritage, natural history and the arts are shared celebrated.	No LSE. Policy that could not have any conceivable adverse effect on a site.		
H2/C	Implement Pembrokeshire Coast National Park Authority's <i>Local Development Plan 2</i> heritage policies	No LSE. Policy that cannot lead to development or other change.		All references to the LDP can be screened out with reference to earlier HRA findings and conclusions
H2/D	Provide guidance on the sympathetic enjoyment of monuments considered sacred and their settings.	No LSE. Policy that could not have any conceivable adverse effect on a site.		
<b>Policy W1: Provide and promote sustainable outdoor recreation opportunities for all.</b>				

<sup>15</sup> Welsh Government - *Cymraeg 2050: Our plan for 2021 to 2026*

Plan section / policy	Description	LSE screening	Potential risks	Comments
W1/A	<i>Barriers to outdoor recreation and wellbeing opportunities are removed, and opportunities promoted to more diverse audiences, e.g. children and young families from deprived areas.</i>	<i>LSE. Policy could have a likely significant effect on sites alone.</i>	<i>All sites as general policy. Risks from recreational disturbance (trampling, disturbance to wildlife etc).</i>	<i>Policy likely to increase recreational use.</i>
W1/B	<i>An Accessible Coast strategy, offering good access for people with specific needs, is delivered. E.g. access for wheelchair users, changing places and toilets at key locations.</i>	<i>LSE. Policy could have a likely significant effect on sites alone.</i>	<i>All sites as general policy. Risks from recreational disturbance (trampling, disturbance to wildlife etc) and potential habitat loss with the addition of accessible facilities (toilet blocks, widening paths etc).</i>	<i>Policy likely to increase recreational use.</i>
W1/C	Recreational pressures and site and community capacity issues are managed e.g. those arising from unauthorised camping or congestion <sup>16</sup> .	No LSE. Policy that cannot lead to development or other change.		Policy may reduce unauthorised access to site.

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<sup>16</sup> Sites include Abereiddi, Abermawr, Barafundle and Stackpole Quay, Cwm yr Eglwys, Freshwater East, Freshwater West, Martin's Haven, Porthgain, Pwllgwaelod, St Justinian, Strumble and Whitesands.

PEMBROKESHIRE MANAGEMENT PLAN HRA 2024

Plan section / policy	Description	LSE screening	Potential risks	Comments
W1/D	<i>The Pembrokeshire Coast Path National Trail, part of the Wales Coast Path, provides a diversity of experiences, and is promoted to new audiences.</i>	<i>LSE. Policy could have a likely significant effect on sites alone.</i>	<i>All coastal sites, with risks from recreational disturbance.</i>	<i>Policy likely to promote an increased use of sites.</i>
W1/E	The <i>Rights of Way Improvement Plan 2018-2028</i> is delivered.	No LSE. Policy that cannot lead to development or other change.		
W1/F	Water quality at designated bathing waters achieving less than “Excellent” status is improved.	No LSE. Policy that cannot lead to development or other change.		Policy likely to improve water quality in some areas the Park, of which some may include European sites.
W1/G	The Milford Haven Waterway is managed in line with recreation management objectives and relevant byelaws.	No LSE. Policy that cannot lead to change.		Policy does not suggest an increase in recreation pressure to the waterway, just continued management and therefore screened out.
W1/H	<i>Dog owners / walkers and dogs are supported to enjoy the Park without risk to themselves or to other visitors, farm animals or wildlife.</i>	<i>LSE. Policy could have a likely significant effect on a site alone.</i>	<i>All sites. Risks from recreational disturbance.</i>	<i>Policy could increase the number of dogs and people visiting European sites.</i>
<b>Policy W2: Provide and promote inspiring outdoor learning and personal development experiences for all.</b>				
W2/A	<i>Active outdoor, environmental, heritage and arts-based recreation and learning is delivered to young people and families.</i>	<i>LSE. Policy could have a likely significant effect on a site alone.</i>	<i>All sites. Risks from recreational disturbance.</i>	<i>Policy likely to increase recreational use.</i>
W2/B	<i>Nature-based health services are delivered, e.g. walking programmes, mental health initiatives, and supporting people living with dementia.</i>	<i>LSE. Policy could have a likely significant effect on a site alone.</i>	<i>All sites. Risks from recreational disturbance.</i>	<i>Policy likely to increase recreational use.</i>

P E M B R O K E S H I R E M A N A G E M E N T P L A N H R A 2 0 2 4

Plan section / policy	Description	LSE screening	Potential risks	Comments
W2/C	Offer volunteering / citizen science and formal training opportunities.	No LSE. Policy that could not lead to development or other change.		
<b>Chapter 6: Climate and natural capital</b>				
<b>Policy N1: Contribute to a carbon-neutral Wales.</b>				
N1/A	<i>Net Zero Wales</i> is delivered. Targets include a carbon neutral public sector by 2030 and a carbon-neutral National Park by 2048. Collaborate with partners to deliver carbon neutral or low carbon options for energy, development, travel, food, to achieve a just transition to net zero and a circular economy.	No LSE. General aspiration that is not likely to have a significant effect on a site.		
N1/B	Pembrokeshire Coast National Park Authority's <i>Local Development Plan 2</i> policies and guidance are delivered, in accordance with the energy hierarchy, sustainable design drainage and waste.	No LSE. Policy that could not lead to development or other change.		All references to the LDP can be screened out with reference to earlier HRA findings and conclusions
N1/C	Farm businesses are supported to reduce carbon through offsetting and reduction measures.	No LSE. Policy that could not lead to development or other change.		
N1/D	The Sustainable Development Fund continues to support community low carbon projects.	No LSE. Policy that could not have any conceivable adverse effect on a site.		
N1/E	Accessible and affordable public transport, active travel and low-carbon vehicle initiatives are delivered.	No LSE. Policy that could not have any conceivable adverse effect on a site.		
<b>Policy N2: Adapt to climate change.</b>				
N2/A	Pembrokeshire Coast National Park Authority's <i>Local Development Plan 2</i> policies and guidance are delivered, including flooding and coastal inundation, development in coastal change	No LSE. Policy that could not lead to development or other change.		All references to the LDP can be screened out with reference to earlier HRA findings and conclusions



P E M B R O K E S H I R E M A N A G E M E N T P L A N H R A 2 0 2 4

Plan section / policy	Description	LSE screening	Potential risks	Comments
	management areas, relocation of development affected by coastal change.			
N2/B	Manage coastal adaptation within the context of the two Shoreline Management Plans and Local Development Plan 2 which cover the coast of Pembrokeshire.	No LSE. Policy that could not lead to development or other change.		All references to the LDP can be screened out with reference to earlier HRA findings and conclusions
N2/C	The Pembrokeshire Climate Adaptation Strategy 2022 is implemented.	No LSE. Policy that could not lead to development or other change.		
<b>Policy N3: Conserve and enhance soils and natural carbon storage.</b>				
N3/A	Soils are conserved and restored (supporting the National Peatland Action Programme), wetlands protected, and semi-natural habitats and trees in the landscape conserved and enhanced.	No LSE. Policy that cannot lead to development or other change; policy sets plan wide-environmental protection.		Several sites within the Park that have wetland properties, therefore policy is likely to have a positive environmental impact.
N3B	Pembrokeshire Coast National Park Authority's <i>Local Development Plan 2</i> policies and guidance are implemented in relation to soil, water, air and earth heritage.	No LSE. Policy that could not lead to development or other change.		All references to the LDP can be screened out with reference to earlier HRA findings and conclusions
<b>Policy N4: Conserve and enhance water quality and restore natural watercourses.</b>				
N4/A	The quality of water bodies in the National Park classed as poor or moderate are improved, within the context of the <i>Western Wales River Basin Management Plan 2021 – 2027</i> .	No LSE. Policy that could not lead to development or other change.		Policy to enhance water quality which might positively effect some European sites within the Park.
N4/B	Environmental harm from storm overflow sewage discharges is eliminated, including working within the framework of the <i>Drainage and Wastewater Management Plan for Cleddau and Pembrokeshire Rivers</i> .	No LSE. Policy that could not lead to development or other change.		

P E M B R O K E S H I R E M A N A G E M E N T P L A N H R A 2 0 2 4

Plan section / policy	Description	LSE screening	Potential risks	Comments
N4/C	Flood risk is managed, within the context of the <i>Flood Risk Management Plan (South West Wales) 2023-2029</i> .	No LSE. Policy that could not lead to development or other change.		
<b>Policy N5: Protect air quality.</b>				
N5/A	Reactive nitrogen emissions are reduced / intercepted, with a focus on potentially-affected nature conservation sites.	No LSE. Policy that could not lead to development or other change.		Policy likely to have a positive environmental effect on European sites.
N5/B	Welsh national air quality targets proposed in The Environment (Air Quality and Soundscapes) (Wales) Bill are achieved.	No LSE. General aspiration that is not likely to have a significant effect on a site.		
<b>Chapter 7: Communities</b>				
<b>Policy SE1: Foster socio-economic wellbeing of National Park communities (in pursuit of National Park purposes).</b>				
SE1/A	Appropriate homes for local communities are delivered through the planning system and joint working, and local lettings policies applied.	No LSE. General aspiration that is not likely to have a significant effect on a site.		Policy is general and does not identify specific sites – LSE would depend on location.
SE1/B	An evidence base on types and needs of homes is developed (e.g. relationship with Welsh language, sharing data on second / holiday homes, considering options regarding local shared ownership).	No LSE. Policy that could not have any conceivable adverse effect on a site.		
SE1/C	Pembrokeshire Coast National Park Authority's <i>Local Development Plan 2</i> policy is applied when determining planning applications. <i>Local Development Plan 2</i> policy covers for example major development, defence sites, lighting, amenity, employment, housing allocations, housing windfall sites and exceptional land releases for affordable housing.	No LSE. General policy wording that could not lead to a likely significant effect on sites.		All references to the LDP can be screened out with reference to earlier HRA findings and conclusions
<b>SE1/D</b>	<b><i>Appropriate support and controls promote a regenerative tourism offer.</i></b>	<b><i>LSE. Policy could have a likely significant effect on sites.</i></b>	<b><i>All sites, recreational disturbance.</i></b>	<b><i>Policy likely to increase recreational use.</i></b>

P E M B R O K E S H I R E M A N A G E M E N T P L A N H R A 2 0 2 4

Plan section / policy	Description	LSE screening	Potential risks	Comments
SE1/E	Support is in place for sustainable local supply chains.	No LSE. Policy that could not have any conceivable adverse effect on a site.		
SE1/F	Local community services are viable and accessible, e.g. shops, schools, play facilities and community halls, etc.	No LSE. Policy that could not lead to development or other change.		
SE1/G	Accessible and affordable public transport, active travel and low-carbon vehicle initiatives are delivered.	No LSE. Policy that could not lead to development or other change.		Cross-references to Policy N1/E

## 4. Appropriate Assessment and Integrity Test

4.1 The following policies were screened in:

- L1/D: Reduce the visual impact of existing infrastructure, e.g. telecommunications and power distribution networks, for example by undergrounding for cables or sharing towers.
- W1/A: Barriers to outdoor recreation and wellbeing opportunities are removed, and opportunities promoted to more diverse audiences, e.g. children and young families from deprived areas.
- W1/B: An Accessible Coast strategy, offering good access for people with specific needs, is delivered. E.g. access for wheelchair users, changing places and toilets at key locations.
- W1/D: The Pembrokeshire Coast Path National Trail, part of the Wales Coast Path, provides a diversity of experiences, and is promoted to new audiences.
- W1/H: Dog owners / walkers and dogs are supported to enjoy the Park without risk to themselves or to other visitors, farm animals or wildlife.
- W2/A: Active outdoor, environmental, heritage and arts-based recreation and learning is delivered to young people and families.
- W2/B: Nature-based health services are delivered, e.g. walking programmes, mental health initiatives, and supporting people living with dementia.
- SE1/D: Appropriate support and controls promote a regenerative tourism offer.

4.2 These are all relatively broad policies, with impacts that relate to **ground works** (and potential risks from direct damage and disturbance) (Policy L1/D) and impacts from **increased recreation use** (Policies W1/A, W1/B, W1/D, W1/H, W2/A, W2/B and SE1/D).

## Impacts from ground works

- 4.3 Policy L1/D sets a trajectory to address the visual impact of infrastructure such as electricity and telecommunication cables. This is likely to involve works such as burying existing cabling and removing structures such as pylons or towers. Were such works to take place within or close to European sites, there is the risk of harm, for example ground works would result in the destruction of habitat or impacts for species. This in turn could have implications for the species/habitat distribution, extent or abundance.
- 4.4 The policy is very broad and general with no specific locations or works are proposed. As such there could be risks (or at least it is not possible to rule out risks) for all European sites and their qualifying features.
- 4.5 The policy does not include any restrictions, criteria or need for assessment which would allow more detailed consideration. However, Policy E1/K provides comprehensive wording relating to Habitats sites, the need for HRA for any proposals and for the assessment to either rule out likely significant effects or adverse effects on integrity. There are no Ramsar sites that are relevant to the assessment<sup>17</sup> and as such, E1/K is catch-all policy wording that ensures Policy L1/D cannot result in any harm to European sites. The inclusion of E1/K can be relied on to eliminate any risk and this accords with the previous assessment work and relevant guidance<sup>18</sup>. This is due to the lack of any specific locations/details in the various policies where likely significant effects were triggered. Had the policies been more specific it would not be possible to rely on a general protection policy. In addition, policy wording in E1/I ensures damage to sites will be prevented, providing further failsafe.
- 4.6 There is no need for in-combination assessment as Policy E1/K eliminates any risk. Given the very strategic and broad nature of the

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<sup>17</sup> This is relevant as Ramsar sites are not part of the National Site Network and are therefore not covered by policy E1/K.

<sup>18</sup> See the Habitats Regulations Handbook F.10.1.5

Plan, with no specific detail on locations, detailed actions etc. the reliance on further assessment at a project level will ensure risks are picked up and assessed at the necessary level of detail and precision. As such, adverse effects on integrity are ruled out, alone or in combination.

### Increased recreation

- 4.7 Policies W1/A, W1/B, W1/D, W1/H, W2/A, W2/B and SE1/D were all screened in as they promote recreation or could result in an increase in recreation use.
- 4.8 It is now increasingly recognised that access to the countryside is crucial to the long-term success of nature conservation projects, for example through enforcing pro-environmental behaviours and inculcating a greater respect for the world around us (Richardson *et al.*, 2016). Access also brings wider benefits to society that include benefits to mental/physical health (Pretty *et al.*, 2005; Lee and Maheswaran, 2011; Keniger *et al.*, 2013) and economic benefits (ICRT, 2011; ICF GHK, 2013; Keniger *et al.*, 2013; The Land Trust, 2018).
- 4.9 There are also considerable challenges as the use of sites for recreation can damage the nature conservation interest and hinder potential for nature recovery. There is a strong body of evidence showing how increasing levels of access can have negative impacts on wildlife. Issues are varied and there is an extensive body of literature documenting a wide range of types of impact (for general reviews see Underhill-Day, 2005; Lowen *et al.*, 2008; Liley *et al.*, 2010; Marzano and Dandy, 2012; Gilchrist *et al.*, 2023).
- 4.10 The policies are very broad and general; with no specific locations or specific activities, scale etc proposed. As such there could be risks (or at least it is not possible to rule out risks) for all European sites and their qualifying features. As highlighted by Chapman in the previous Management Plan HRA, policy support for promoting sustainable recreational opportunities is a central part of the National Parks objectives and the requirements of the Habitats Regulations should not prevent such objectives being met. Hypothetically speaking, it

might be argued that the Plan supports and promotes recreational use, irrespective of any conflict that may arise with the achievement of the conservation objectives for European sites.

- 4.11 The difficult balancing act between recreation provision and nature conservation are recognised within the Plan and issues are summarised in the front part of the plan (in the section entitled Where are we now? and under the sub-heading Recreation and discovery section). Policies E1/E (wildlife), E2/G (management of recreational disturbance to wildlife) and W1/C (relating to capacity issues and unauthorised camping) provide strategic context to address issues, and E2/G includes mention of restrictions, codes of conduct and awareness raising.
- 4.12 Policy E1/K again provides comprehensive wording relating to Habitats sites, the need for HRA for any proposals and for the assessment to either rule out likely significant effects or adverse effects on integrity. As such, there is catch-all policy wording that ensures no component policies within the plan can result in any harm to European sites.
- 4.13 The inclusion of E1/K eliminates any risk and allows a conclusion of no adverse effects on integrity, alone or in-combination.

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## Appendix 1: European sites

The table below lists all European sites within a 20km radius of the National Park boundary. The links cross-reference to the relevant page on the JNCC website which provides further detail, background and context for each site.

European site	Qualifying features	Description
<b>SACs</b>		
<a href="#">Afon Teifi / River Teifi</a>	<p><b>3260</b> Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation</p> <p><b>3130</b> Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or of the Isoëto-Nanojuncetea</p> <p><b>1096 Brook Lamprey</b> <i>Lampetra planeri</i></p> <p><b>1099 River Lamprey</b> <i>Lampetra fluviatilis</i></p> <p><b>1106 Atlantic Salmon</b> <i>Salmo salar</i></p> <p><b>1163 Bullhead</b> <i>Cottus gobio</i></p> <p><b>1355 Otter</b> <i>Lutra lutra</i></p> <p><b>1831 Floating Water-Plantain</b> <i>Luronium natans</i></p> <p><b>1095 Sea lamprey</b> <i>Petromyzon marinus</i></p>	<p>The River Teifi is located in West Wales and has a large catchment area across the region. Some parts are fast-flowing with steep gorges, as most of the river flows over hard rock. In stream vegetation is dominated by species such as stream water-crowfoot, water-starworts and aquatic moss. The Teifi also contains a low-lying area of active bog (7110) which is an SAC in its own right.</p> <p>The Teifi is predominantly mesotrophic, although in parts oligotrophic and supports mostly water-crowfoot. These semi-productive waters support a diverse mix of habitat favoured by breeding populations of lamprey species, salmon and otter.</p>
<a href="#">Afonydd Cleddau / Cleddau Rivers</a>	<p><b>3260</b> Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation</p> <p><b>7110</b> Active raised bogs * Priority feature</p> <p><b>91E0</b> Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i>, <i>Alnion incanae</i>, <i>Salicion albae</i>) * Priority feature</p> <p><b>1096 Brook Lamprey</b> <i>Lampetra planeri</i></p> <p><b>1099 River Lamprey</b> <i>Lampetra fluviatilis</i></p> <p><b>1163 Bullhead</b> <i>Cottus gobio</i></p> <p><b>1355 Otter</b> <i>Lutra lutra</i></p> <p><b>1095 Sea Lamprey</b> <i>Petromyzon marinus</i></p>	<p>Cleaddau Rivers is located in West Wales and can broadly be split into its Eastern and Western Regions. The rivers are moderately fast flowing through its low-lying agricultural catchment, and are dominated by vegetative species such as water-crowfoot. The rivers and associated tributaries support breeding populations of lamprey species, bullhead and otter.</p> <p>The SAC is also designated for areas of active raised bog, a rich peatland habitat, and for alluvial forests dominated by alder and willow.</p>

European site	Qualifying features	Description
<a href="#">Bristol Channel Approaches / Dynesfeydd Môr Hafren</a>	<b>1351 Harbour Porpoise</b> <i>Phocoena phocoena</i>	<p>Harbour porpoise is widespread throughout cold and temperate European waters and appear to make seasonal movements towards the coast. This is likely to coincide with breeding (thought to be June-July) for the feeding and support of calves in calmer, shallower, highly productive waters.</p>
<a href="#">Cardigan Bay / Bae Ceredigion</a>	<p><b>1110</b> Sandbanks which are slightly covered by sea water all the time  <b>1170</b> Reefs  <b>8330</b> Submerged or partially submerged sea caves  <b>1349 Bottlenose Dolphin</b> <i>Tursiops truncatus</i>  <b>1095 Sea Lamprey</b> <i>Petromyzon marinus</i>  <b>1099 River Lamprey</b> <i>Lampetra fluviatilis</i>  <b>1364 Grey Seal</b> <i>Halichoerus grypus</i></p>	<p>A population of approximately 125 bottlenose dolphins use the inshore waters of the bay for breeding and juveniles are also observed with other adults or groups. These are the primary reasons for the international designation of this site, however these are supported by a range of marine habitats including rocky reefs, submerged or partially submerged caves and a sandbank system that is common around the coast.</p>
<a href="#">Carmarthen Bay and Estuaries / Bae Caerfyrddin ac Aberoedd</a>	<p><b>1110</b> Sandbanks which are slightly covered by sea water all the time  <b>1130</b> Estuaries  <b>1140</b> Mudflats and sandflats not covered by seawater at low tide  <b>1160</b> Large shallow inlets and bays  <b>1310</b> Salicornia and other annuals colonizing mud and sand  <b>1330</b> Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>)  <b>1103 Twaite Shad</b> <i>Alosa fallax</i>  <b>1095 Sea Lamprey</b> <i>Petromyzon marinus</i>  <b>1099 River Lamprey</b> <i>Lampetra fluviatilis</i>  <b>1102 Allis Shad</b> <i>Alosa alosa</i>  <b>1355 Otter</b> <i>Lutra lutra</i></p>	<p>Carmarthen Bay and Estuaries is primarily designated for its rich variety of marine and estuarine habitats. Large, shallow inlets and bays provide a range of seabed types for a number of species including worms, brittlestars and bivalve molluscs. The bay is also home to Atlantic salt meadows, mudflats and sandflats not covered by the tide and sandbanks.</p> <p>Sandbanks are a highly important habitat, and widespread around the coast. They usually support a range of burrowing fauna which in turn support seabirds such as puffins, razorbills and guillemots. The Helwick Bank in Carmarthen Bay is usual in that there is a high-level wave and wind action so the residing species have a high stress tolerance.</p> <p>Carmarthen Bay is also designated for the Twite shad, a small species of herring, that migrates via these waters to spawning grounds in the River Tywi.</p>

European site	Qualifying features	Description
<a href="#">Carmarthen Bay Dunes / Twyni Bae Caerfyrddin</a>	<p><b>2110</b> Embryonic shifting dunes  <b>2120</b> "Shifting dunes along the shoreline with <i>Ammophila arenaria</i> ("white dunes")"  <b>2130</b> "Fixed coastal dunes with herbaceous vegetation ("grey dunes")" * Priority feature  <b>2170</b> Dunes with <i>Salix repens</i> ssp. <i>argentea</i> (<i>Salicion arenariae</i>)  <b>2190</b> Humid dune slacks  <b>1014</b> <b>Narrow-mouthed Whorl Snail</b> <i>Vertigo angustior</i>  <b>1395</b> <b>Petalwort</b> <i>Petalophyllum ralfsii</i>  <b>1903</b> <b>Fen orchid</b> <i>Liparis loeselii</i></p>	<p>Carmarthen Bay Dunes protect a complex dune system of embryonic shifting dunes, white dunes, grey dunes and 100ha of humid slack dunes which represents the largest area in Wales.</p> <p>The largest known UK population of narrow-mouthed whorl snail resides at areas where the dunes and saltmarsh meet freshwater.</p> <p>Petalwort is also present at the site as well as 10% of the UK population of fen orchids, one of the few remaining sites where they are known to occur.</p>
<a href="#">Gweunydd Blaencleddau</a>	<p><b>4010</b> Northern Atlantic wet heaths with <i>Erica tetralix</i>  <b>6410</b> <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>)  <b>7130</b> Blanket bogs (* if active bog) * Priority feature  <b>7140</b> Transition mires and quaking bogs  <b>7230</b> Alkaline fens  <b>1065</b> <b>Marsh Fritillary Butterfly</b>  <b>1044</b> <b>Southern Damselfly</b></p>	<p>Marsh fritillary is the primary reason for designation at this site. The mixture of wet heath and damp grassland provides extensive habitat and with the nearby population at Preseli this area holds a strong population. The southern damselfly, occurring in localised populations across South-west England and south-Wales, is also supported by this wet heath habitat.</p> <p>Wet heaths, blanket bogs, <i>Molinia</i> meadows, transition mires and quaking bogs provide supporting habitat for the marsh fritillary.</p>
<a href="#">Limestone Coast of South West Wales / Arfordir Calchfaen De Orllewin Cymru</a>	<p><b>1230</b> Vegetated sea cliffs of the Atlantic and Baltic Coasts  <b>2130</b> "Fixed coastal dunes with herbaceous vegetation ("grey dunes")" * Priority feature  <b>4030</b> European dry heaths  <b>6210</b> Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (* important orchid sites)  <b>8310</b> Caves not open to the public  <b>8330</b> Submerged or partially submerged sea caves  <b>1304</b> <b>Greater Horseshoe Bat</b> <i>Rhinolophus ferrumequinum</i>  <b>1654</b> <b>Early Gentian</b> <i>Gentianella anglica</i></p>	<p>The warm, south-facing slopes of calcareous cliffs supports a species rich plant community. These vegetated sea cliffs are host to rare species such as yellow whitlow grass and spring squill. Small restharrow, early gentian and endemic rock lavenders also occur here. Similarly, some rare 'lime-loving' lichen species are supported by the calcicolous grasslands formed within the fixed coastal grey dunes system. The dunes are maintained by a healthy population of rabbits, sheep and cattle giving rise to the base-rich, calcicolous grasslands.</p>

P E M B R O K E S H I R E M A N A G E M E N T P L A N H R A 2 0 2 4

European site	Qualifying features	Description
	<p><b>1395 Petalwort</b> <i>Petalophyllum ralfsii</i></p>	
<p><a href="#">North Pembrokeshire Woodlands / Coedydd Gogledd Sir Benfro</a></p>	<p><b>91A0</b> Old sessile oak woods with Ilex and Blechnum in the British Isles  <b>91E0</b> Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) * Priority feature  <b>1308 Barbastelle Bat</b> <i>Barbastella barbastellus</i></p>	<p>This site is an example of an ancient sessile oak woodland, which ranges from some upland acidic oak woodland so some lowland woodland important for floodplains in the valley bottoms. The woodlands support a population of Barbastelle bats, which is one of the UKs rarest mammals.</p>
<p><a href="#">North West Pembrokeshire Commons / Comin Gogledd Orllewin Sir Benfro</a></p>	<p><b>4030</b> European dry heaths  <b>7140</b> Transition mires and quaking bogs  <b>4010</b> Northern Atlantic wet heaths with Erica tetralix  <b>6410</b> Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae)  <b>1831 Floating Water-Plantain</b> <i>Luronium natans</i></p>	<p>The Pembrokeshire Commons host a range of heathland habitat mostly consisting of humid heathland and examples of transitions into smaller amounts of dry heath. Transition mires and quaking bogs are also present and a qualifying feature of this site, in addition to wet heaths and Molinia meadows. Floating water-plantain occupies heathland pools, isolated from other populations occurring in central and northern Wales and is also a primary reason for the designation of this site.</p>
<p><a href="#">Pembrokeshire Bat Sites and Bosherton Lakes / Safleoedd Ystlum Sir Benfro a Llynnoedd Bosherton</a></p>	<p><b>3140</b> Hard oligo-mesotrophic waters with benthic vegetation of Chara spp.  <b>1304 Greater Horseshoe Bat</b> <i>Rhinolophus ferrumequinum</i>  <b>1303 Lesser Horseshoe Bat</b> <i>Rhinolophus hipposideros</i>  <b>1355 Otter</b> <i>Lutra lutra</i></p>	<p>Bosherton Lakes are a series of calcium rich springs isolated from the sea by a sand-stone ridge. The lake system hosts charophyte species in the western half, whilst the eastern is hosts to various pondweed species. Greater horseshoe bats are also present in the area with maternity, hibernation and transitory roosts and it is thought this site holds 9.5% of the UK population.</p>
<p><a href="#">Pembrokeshire Marine / Sir Benfro Forol</a></p>	<p><b>1130</b> Estuaries  <b>1160</b> Large shallow inlets and bays  <b>1170</b> Reefs  <b>1110</b> Sandbanks which are slightly covered by sea water all the time  <b>1140</b> Mudflats and sandflats not covered by seawater at low tide  <b>1150</b> Coastal lagoons * Priority feature  <b>1330</b> Atlantic salt meadows (<i>Glauco-Puccinellietalia maritimae</i>)</p>	<p>Pembrokeshire Marine supports a wide diversity of communities and species, particularly in its ria estuary. The large shallow inlets and bays host rich sediment communities and the submerged and partially submerged rocky reef system also supports an abundance of biodiversity. One of the largest breeding colonies of grey seals on the south-west coast is supported by this diversity, and is one of the primary reasons for the site international protection alongside shore dock.</p>

P E M B R O K E S H I R E M A N A G E M E N T P L A N H R A 2 0 2 4

European site	Qualifying features	Description
	<p><b>8330</b> Submerged or partially submerged sea caves  <b>1364 Grey Seal</b> <i>Halichoerus grypus</i>  <b>1441 Shore Dock</b> <i>Rumex rupestris</i>  <b>1095 Sea Lamprey</b> <i>Petromyzon marinus</i>  <b>1099 River Lamprey</b> <i>Lampetra fluviatilis</i>  <b>1102 Allis Shad</b> <i>Alosa alosa</i>  <b>1103 Twaite Shad</b> <i>Alosa fallax</i>  <b>1355 Otter</b> <i>Lutra lutra</i></p>	
<p><a href="#">Preseli</a></p>	<p><b>4010</b> Northern Atlantic wet heaths with <i>Erica tetralix</i>  <b>4030</b> European dry heaths  <b>7150</b> Depressions on peat substrates of the Rhynchosporion  <b>7230</b> Alkaline fens  <b>1044 Southern Damselfly</b> <i>Coenagrion mercurial</i>  <b>1065 Marsh Fritillary Butterfly</b>  <b>1393 Slender Green Feather-Moss</b> <i>Drepanocladus (Hamatocaulis) vernicosus</i></p>	<p>Preseli protects a mixture of bogs, marshes, heathland and grassland habitat. The site is primarily protected for the Southern damselfly, Marsh fritillary and Slender green feather-moss. Preseli supports one of the largest populations in the UK of both Southern damselflies and Marsh fritillaries, with support from the adjacent site populations of Gweunydd Blaencleddau.</p>
<p><a href="#">St David's / Ty Ddewi</a></p>	<p><b>1230</b> Vegetated sea cliffs of the Atlantic and Baltic Coasts  <b>4030</b> European dry heaths  <b>1831 Floating Water-Plantain</b> <i>Luronium natans</i></p>	<p>The vegetated sea cliffs and heathland for which the site is primarily designated, hosts small communities of lichen, wild privet and blackthorn leading into maritime grassland with gorse and heather heathland. Ramsey Island, with three rare rain-fed lowland pools, provide habitat for floating plantain for which the site is also internationally important.</p>
<p><a href="#">West Wales Marine / Gorllewin Cymru Forol</a></p>	<p><b>1351 Harbour Porpoise</b> <i>Phocoena phocoena</i></p>	<p>Harbour porpoise is widespread throughout cold and temperate European waters and appear to make seasonal movements towards the coast. This is likely to coincide with breeding (thought to be June-July) for the feeding and support of calves in calmer, shallower, highly productive waters.</p>

P E M B R O K E S H I R E M A N A G E M E N T P L A N H R A 2 0 2 4

European site	Qualifying features	Description
<a href="#">Yerbeston Tops</a>	<p><b>6410</b> Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae)</p> <p><b>1065 Marsh Fritillary Butterfly</b> <i>Euphydryas (Eurodryas, Hypodryas) aurinia</i></p>	<p>Yerbeston Tops is a mosaic of woodland, heathland, marshes and improved grassland located in West Wales. The site supports an isolated population of approximately 1500 adult Marsh fritillaries.</p>
<a href="#">Bae Caerfyrddin / Carmarthen Bay</a>	<p><b>A065 Common Scoter</b> (NB) <i>Melanitta nigra</i></p>	<p>Carmarthen Bay was the first fully marine SPA designated in the UK, and supports the over-wintering population and migratory species of common scoter.</p>
<a href="#">Castlemartin Coast</a>	<p><b>A346 Chough</b> (B) <i>Pyrrhocorax pyrrhocorax</i></p>	<p>The Castlemartin Coast is 20km of maritime habitats including limestone cliffs, heaths, grassland and dunes. The site was designated for its breeding population of chough.</p>
<a href="#">Grassholm</a>	<p><b>A016 Gannet</b> (B) <i>Morus bassanus</i></p>	<p>The island supports approximately 39,000 pairs of gannets during the breeding season, roughly 12.5% of the North Atlantic population and is the largest colony in Wales.</p>
<a href="#">Ramsey and St David's Peninsula Coast</a>	<p><b>A346 Chough</b> (B) <i>Pyrrhocorax pyrrhocorax</i></p>	<p>The site includes Ramsey and smaller islands, as well as the vegetated sea cliffs, maritime heathlands and grasslands that are components of the St David's SAC. This site was designated for its breeding population of chough.</p>
<a href="#">Skomer, Skokholm and the Seas off Pembrokeshire</a>	<p><b>A222 Short-eared Owl</b> (B) <i>Asio flammeus</i></p> <p><b>A204 Puffin</b> (B) <i>Fratercula arctica</i></p> <p><b>A014 Storm Petrel</b> (B) <i>Hydrobates pegagicus</i></p> <p><b>A183 Lesser Black-backed Gull</b> (B) <i>Larus fuscus</i></p> <p><b>A013 Manx Shearwater</b> (B) <i>Puffinus puffinus</i></p> <p><b>A346 Chough</b> (B) <i>Pyrrhocorax pyrrhocorax</i></p>	<p>The islands are designated for breeding populations of seabirds in addition to kittiwakes, razorbill and guillemot.</p>