



Huwel Manley  
Natural Resources Wales  
Plas Gwendraeth, Heol Parc Mawr  
Crosshands Business Park  
Cross Hands  
Llanelli  
SA14 6RE

13 February 2024

Dear Huwel,

### **Aberarth – Carreg Wylan SSSI**

We are writing to express our concern about past and future impacts of coastal recreational activity on the above SSSI on the Pembrokeshire / Ceredigion coast. We have been contacted by local residents, who are concerned that increasing recreational pressure is causing damage to the ecology of this large and important coastal protected site.

### **Ecological concerns**

NRW's Protected Sites Baseline Assessment in 2020 records 18 qualifying, or notified and qualifying, features for this site. All bar three (geological) features are of unknown condition, or unfavourable condition: none of the ecological features are listed as favourable. This means that there is no mechanism to test and monitor the impacts of disturbance on the SSSI.

A number of features of this stretch of coast are known to be vulnerable to disturbance.

Dolphins and Grey Seal *Halichoerus grypus*: the SSSI site management statement says, "the site should continue to contribute at least 5% of the pups born within the West Wales population annually, and [...] any decline in the population on this site should not be significantly more than any decline in the West Wales population." Also, in relation to dolphins and seals, it says "new developments involving powered craft and other recreational activities will require careful consideration on a case-by-case basis to determine whether they will have an adverse effect on dolphins or seals."



Sea Pea *Lathyrus japonicus*; this is not listed as a SSSI feature, however the Moylegrove area of the SSSI represented this species' only extant post-2000 site in Wales, according to the BSBI Plant Atlas. This is now believed to have been lost, after survey visits by the county BSBI recorder, and he cites recreational activity on the beach as a likely contributing factor. This report is available on the BSBI website.

Intertidal habitat: the site management statement recognises that key management issues for this habitat include recreational pressure. It states that "it is not thought that recreational use of the shore is of detriment to the intertidal features at present, but honeycomb worm reefs are known to be sensitive to trampling and this will need to be kept under review."

Chough: breeding Chough are known to be vulnerable to disturbance. Of this species, the site management statement says, "sheltered crevices and recesses on the cliff faces in some areas are used for breeding and roosting and it is important that these specific locations remain undisturbed".

The list of Potentially Damaging Operations available on the NRW website includes: "recreational activities in a manner likely to damage the flora, fauna or features for which the site is of special interest".

### Activity and risk

Coastal recreational activity has been growing in Wales, and adventure holidays are actively promoted by Visit Wales. Activities such as coasteering, particularly, have grown in recent years, and a whole new language of tourism and range of activities and providers have developed. The context has therefore substantially changed since the SSSI was designated in 2002, and the above documents written. We are aware that this wider issue of increasing recreational pressure has been discussed by Pembrokeshire Coastal Forum. The website [coasteering.co.uk](http://coasteering.co.uk) now lists six Coasteering experience providers in Pembrokeshire alone.

The company Adventure Beyond, amongst others, is known to operate within this SSSI. We are aware that this company is promoting a new venture "Caffi Ceibwr" which is looking to develop a more substantial coastal activity offer which, if successful, will further increase recreational pressure on this SSSI around Ceibwr Bay.



## Our concerns and questions

We would like to establish:

- (1) whether adventure tourism companies operating in the SSSI are required to have a consent for any activities that might affect features vulnerable to disturbance?
- (2) if so, whether there is any reporting or monitoring of compliance with the consent issued (and how are any reports of public disturbance recorded and dealt with)?
- (3) whether NRW has any specific plans to address the lack of knowledge of the condition of features vulnerable to disturbance?
- (4) whether NRW has any information that it can share, or cite, if it believes that the increased recreational activity at this SSSI is not having a detrimental impact on it?

If, as seems likely, there will be a planning application forthcoming for the further development of Caffi Ceibwr to offer more coastal recreation opportunities (we note that the initiative has already received UK shared prosperity funding - [Discover Witches Cauldron and Ceibwr Bay \(cafficeibwr.cymru\)](#)), will NRW be commenting on the proposals? This.

If NRW will be responding, what data will it use to offer an opinion, given the lack of monitoring of recreational activity and feature condition, to meet its duty for protected sites?

Yours sincerely,

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